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Honorable Christopher M. Alston
Chapter 11
Ex Parte

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 In re:
10 NORTHWEST TERRITORIAL MINT, LLC,

Case No. 16-11767-CMA

11 CHAPTER 11 TRUSTEE'S OBJECTION
12 TO APPLICATION FOR ORDER
13 AUTHORIZING LUC MARTINI TO
CONDUCT RULE 2004 EXAMINATIONS

14 Mark Calvert, the Chapter 11 Trustee (the "Trustee") for the Northwest Territorial Mint,
15 LLC ("NWTM"), in the above-captioned proceeding, by and through his attorneys, K&L Gates,
16 LLP, hereby files this objection to Application for Order Authorizing Luc Martini to Conduct Rule
17 2004 Examinations (the "Application"). By the Application, Luc Martini seeks authorization to
18 conduct examinations and compel the production of documents by not only the Trustee, but by
19 current employees of NWTM, one of which resides in the state of Nevada. Trustee's counsel has
20 reached out to Mr. Martini's counsel and offered to provide whatever information Mr. Martini seeks,
21 but has received no response. The Trustee remains willing to cooperate with reasonable requests for
22 information, however he is concerned about the needless distraction that would result from
23 compulsory compliance with open-ended demands, both by himself and key employees. Given the
24 Trustee's willingness to cooperate with reasonable requests for information, compulsory
25 examinations are unnecessary. It also bears noting that the Trustee was not provided notice of the *ex*
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TRUSTEE'S OBJECTION TO APPLICATION FOR
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RULE 2004 EXAMINATIONS - 1
500321292 v2

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1 *parte* application in accordance with Local Rule 9013-1(d)(3)(C). Accordingly, the Application
2 should be denied.
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4 DATED this 17th day of March, 2017.
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6 K&L GATES LLP
7

8 By /s/ David C. Neu
9 Michael J. Gearin, WSBA #20982
10 David C. Neu, WSBA #33143
11 Brian T. Peterson, WSBA #42088
12 Attorneys for Mark Calvert, Chapter 11 Trustee
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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on March 17, 2017, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 17th day of March, 2017 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz