

Honorable Christopher M. Alston  
Chapter 11  
Hearing Date: October 20, 2017  
Hearing Time: 9:30 a.m.  
**Response Date:** October 13, 2017

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In Re:	)	Case No. 16-11767
	)	
Northwest Territorial Mint, LLC,	)	<b>UNITED STATES TRUSTEE'S</b>
	)	<b>REPLY TO RESPONSES AND</b>
	)	<b>OBJECTIONS TO MOTION TO</b>
Debtor.	)	<b>RESTRICT FILINGS BY JEFFREY</b>
	)	<b>MARK MCMEEL AND TO SEAL</b>
	)	<b>DOCUMENTS</b>

The United States Trustee hereby replies to the response filed by Jeffrey Mark McMeel (the "McMeel Response" by "McMeel") and responses and objections filed by various other creditors (collectively, the "Other Responses") to the United States Trustee's motion for an order restricting filings by Jeffrey Mark McMeel and sealing certain documents filed by McMeel (the "Motion"). In support of the reply and the Motion, the United States Trustee states as follows:

A. The McMeel Response.

As with other documents and pleadings filed by McMeel, the McMeel Response is gibberish consisting of inflammatory and untrue statements that, together, are incomprehensible and generally without any discernable purpose other than to cast aspersions on the Court and professionals appearing in the case.

B. Other Responses.

Notice of the Motion was sent out to the mailing matrix, which resulted in many responses and objections from unsecured creditors being filed. The United States Trustee

1 received many more responses and objections that were not filed. None of the Other Responses  
2 raise any substantive or procedural reason for not granting the Motion. Instead, the Other  
3 Responses reflect a lack of understanding about the relief sought in the Motion and also a  
4 frustration with having lost money to the Debtor in what many of the creditors perceive to be  
5 prepetition fraudulent solicitation and sale of precious metal.

6 C. Conclusion.

7 McMeel is filing incoherent and, at times, abusive and slanderous pleadings with the  
8 Court that have no discernable purpose other than harassment. Those pleadings are improper  
9 and unnecessary to the prosecution of the chapter 11 case. The pleadings are also in direct  
10 violation of the Court's sanctions order, filed as ECF document no. 328. The United States  
11 Trustee believes that the simplest way to stop McMeel's abusive filings is to instruct the Clerk  
12 not to accept anything for filing from McMeel unless it is signed by an attorney. That will be  
13 easy to enforce, and allow McMeel to seek any relief he wishes under the guidance of counsel.  
14 Additionally, the United States Trustee requests that the Court -- as it previously did in  
15 conjunction with the sanctions order against McMeel -- order that McMeel's pleadings and  
16 documents be sealed. Those documents and pleadings include the ECF nos. set forth in the  
17 Motion, as well as documents and pleadings filed after the Motion, i.e. nos. 1214, 1215, 1227,  
18 1231, and 1232.

19 Dated: October 17, 2017

20 Respectfully submitted,

21  
22 Gail Brehm Geiger  
23 Acting U.S. Trustee for Region 18

24 /s/ Martin L. Smith  
25 Martin L. Smith, WSBA #24861  
26 Attorney for United States Trustee