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The Honorable Christopher M. Alston
Chapter 13
Location: Seattle, Courtroom 7206
Hearing Date: June 17, 2016, 9:30 AM
Response Deadline: June 10, 2016

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re

NORTHWEST TERRITORIAL MINT,
LLC

Debtor.

Bankruptcy No. 16-11767-CMA

**DECLARATION OF DANIEL J.
BUGBEE IN SUPPORT OF DIANE
ERDMANN'S MOTION TO
DETERMINE APPLICABILITY OF
AUTOMATIC STAY**

I, DANIEL J. BUGBEE, hereby declare as follows:

1. I am an attorney for Diane Erdmann. I am over the age of 18, am competent to testify herein, and unless otherwise noted, I make this declaration from personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of the Affidavit of Derrin Tallman, dated May 13, 2016, which was provided to me by counsel for the Trustee, Mark Calvert, in discovery. In paragraph 3, Mr. Tallman indicates his belief that certain property currently held by the King County Sheriff were previously located at the Debtor's Federal Way facility.

3. Attached hereto as Exhibit B is a true and correct copy of the Writ of Execution of Personal Property entered by the King County Superior Court on March 30, 2016, which was then re-filed in the same court by judgment creditors Bradley Stephen Cohen and Cohen

1 Asset Management, Inc. (“Cohen”) on May 13, 2016 in support of an ex parte motion for an
2 order authorizing the Sheriff to break and enter. Attached hereto as Exhibit C is a true and
3 correct copy of the Order Authorizing Sheriff to Break and Enter that was entered by the King
4 County Superior Court on May 13, 2016.

5 4. Attached hereto as Exhibit D is a true and correct copy of the Subpoena issued
6 by Cohen to Diane Erdmann in King County Superior Court case no. 16-2-05611-3 (the “State
7 Court Proceeding”) on April 26, 2016.

8 5. Attached hereto as Exhibit E is a true and correct copy of Cohen’s Response in
9 Opposition to Motion for Protective Order filed in the State Court Proceeding on May 11,
10 2016.

11 6. Attached hereto as Exhibit F is a true and correct copy of Cohen’s Supplemental
12 Memorandum in Opposition to Motion for Protective Order filed in the State Court Proceeding
13 on May 26, 2016. Attached hereto as Exhibit G is a true and correct copy of the Declaration of
14 Michael Gearin filed in support of the Supplemental Memorandum at Exhibit F.

15 7. Attached hereto as Exhibit H is a true and correct copy of a Sheriff’s Notice of
16 Sale of Personal Property setting a sale of property seized to satisfy the foreign judgment in the
17 State Court Proceeding for June 15, 2016.

18 8. Attached hereto as Exhibit I is a true and correct copy of the inventory and
19 photographs provided to this firm by the King County Sheriff’s Office depicting the property
20 seized and to be sold pursuant to the sale notice at Exhibit H.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify on May 27, 2016, I caused the foregoing document to be electronically
3 filed with the Clerk of the Court using the CM/ECF system which, pursuant to Local Rule 5005-
4 1(c)(1), causes parties who are registered ECF participants to be served by electronic means.

5 Dated this 27th day of May, 2016, at Seattle, Washington.

6
7 DBS | Law

8
9 By /s/ Dominique R. Scalia
10 Dominique R. Scalia