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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

in re:

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.

Case No. 16-11767-CMA

SUPPLEMENTAL DECLARATION OF RODGER OVERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES

- I, Rodger Overson, hereby declare as follows:
- 1. I submit this Declaration in support of the Trustee's Motion for Order Granting Authority to Return Stored Inventory, Other Customer Owned Inventory, and Coining Dies (the "Motion"). I am over eighteen (18) years of age, and I am competent in all ways to testify.
- 2. In the Trustee's declaration filed in support of the Motion, Mr. Calvert states that I am the owner of two gun safes located on the Debtor's property. The Trustee requests authority to return the safes and their contents to me. I provide this declaration to substantiate my ownership of the safes at issue and their contents, and request that the Court grant the Trustee authority to return the safes and their contents to me.
 - 3. Over the course of several years, I purchased large quantities of silver from

SUPPLEMENTAL DECLARATION OF RODGER OVERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 1 ICU2070561100001122732_BTP1/22732P320N

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
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TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

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Northwest Territorial Mint, LLC (the "Debtor" or "NWTM"). Between June 19, 2014, and July 18, 2014, I made five purchases of silver and gold from the Debtor under sales order numbers 34526, 35611, 37753, 38420, and 38508. I have provided copies of my purchase orders to the Trustee. Shortly thereafter, on July 22, 2016, I purchased two Liberty Franklin 50-gun safes to store precious metals that I own. The serial numbers for the gun safes are #L001579791 and #L001610876. I purchased the safes for \$5,599.90, which I paid with my Bank of America credit card. Attached hereto as Exhibit A, is a copy of the invoice I received from NW Safe Company, Inc. for the sale of the two gun safes.

- 4. Around the same time, I discussed with Ross Hansen, my need secure storage space. In particular, I told him that I needed space for the two gun safes that would contain the precious metals I had purchased from NWTM. Mr. Hansen gave me permission to store the two gun safes in the Debtor's "Building B," located at 550 3rd St SW, Auburn, WA 98001. Mr. Hansen did not charge me for rent or storage of my gun safes.
- 5. On or about August 7, 2014, NW Safe Company, Inc. delivered the two safes to the Debtor, One of the Debtor's employees then accompanied a delivery truck to Building B, where I met the delivery truck and the NWTM employee. The two safes were unloaded from the truck and placed in Building B.
- 6. Over the course of the next couple of months, the precious metals I ordered between June 19, 2014, and July 18, 2014, were delivered to Building B in multiple shipments. For each shipment, I met a delivery truck at Building B and loaded precious metals into my two safes. I recall that on more than one occasion, Dave Huffman accompanied the delivery truck and helped me load my precious metals into my safes. On each occasion, once the precious metals I purchased were loaded into the safes, I secured and locked the safes. I am the only person with the ability to access the safes, and I never provided the combination(s) for the safes to any other person.
- The safes contain precious metals that I have purchased from NWTM. To my SUPPLEMENTAL DECLARATION OF RODGER OVERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN K&L GATES LLP STORED INVENTORY, OTHER CUSTOMER 925 FOURTH AVENUE OWNED INVENTORY, AND COINING DIES - 2 SUITE 2900

SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022

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knowledge, the only other item in the safes, aside from perhaps some paperwork, is a dehumidifier I purchased from NW Safe Company that is listed on the attached invoice. Mr. Hansen did not store any of the Debtor's property in the safes, nor could he have done so given that I have all times been the only person with knowledge of the combination(s) that will unlock the safes.

8. I have agreed that, as a condition of the Trustee returning my safes and their contents to me, I will open the safes and let the Trustee view their contents. Before returning the safes and their contents, the Trustee will confirm that the contents of the safes consist solely of precious metals that I have purchased from the Debtor as evidenced by the sales records that I have provided to the Trustee and that are in the Trustee's possession.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this it day of August, 2016, at Federal Way, Washington.

Rodger Overson

SUPPLEMENTAL DECLARATION OF RODGER OVERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 3 K-12070561100001122732_BTP122732P320N

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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a practice assistant in the law firm of K&L Gates LLP, and on August 12, 2016, 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 12th day of August, 2016 at Seattle, Washington.

Denise A. Evans

SUPPLEMENTAL DECLARATION OF RODGER OVERSON IN SUPPORT OF MOTION FOR ORDER GRANTING AUTHORITY TO RETURN STORED INVENTORY, OTHER CUSTOMER OWNED INVENTORY, AND COINING DIES - 4

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EXHBIT A

NW Safe Company, Inc.

830 Cole Street Suite A Enumclaw WA 98022 360-825-5953



Invoice

DATE	INVOICE#		
8/7/2014	140719RO		

BILL TO

Rodger Overson 2750 SW 312th PL Federal Way, WA 98023 SHIP TO

Meet Ross in Safeway Parking lot South Auburn

253-334-6455 Phone

EVENT/PO T		TERMS	PAID BY	REP	EST DEL DATE	SHIP BY	REFERRED BY		FACTORY ORD#	
na PA		PAID	Visa	KH	8/7/2014	NWS	R	loss		
QUA	ITEM CO	DDE		DE	SCRIPTION			PRICE	AMOUNT	
2	LFR 50 GY D SALE INSTALL S D SALE BOLT Con D SALE DH18 D SALE	Lock Disc Prof Disc Bolt Disc Gun Disc Subt	Liberty Franklin 50 Gun Safe, Gray Marble, Black Chrome Hardware, Dial Lock, SN 1579791 & 1610876 Discount for Sale - Instant Professional Gun Safe Installation & Set Up Discount for Sale Bolt down safe to concrete Discount for Sale Gun Saver Dehumidifier (UL Listed) 18" Discount for Sale Subtotal Liberty Mail In Rebate \$75.00 for Each Franklin 50. Will ship directly from factory to customer Available 50 Empty = 1025 #						0.00 -200.00 0.00 800.00 0.00 -400.00 0.00 90.00 0.00 -90.00 0.95 79.90	
Received Date				Subto	Subtotal		\$5,599.90			
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