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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

In re

NO. 16-11767-CMA

Chapter 11

NORTHWEST TERRITORIAL MINT,
LLC,

Debtor.

RESPONSE BY CREDITORS
BRADLEY S. COHEN AND COHEN
ASSET MANAGEMENT, INC. TO
MOTION TO WITHDRAW AS
ATTORNEY FOR DEBTOR

Creditors Bradley S. Cohen and Cohen Asset Management, Inc. hereby respond to The Tracy Law Group PLLC’s Motion for Authority to Withdraw as Attorney for Debtor (Doc. No. 76).

Creditors Bradley S. Cohen and Cohen Asset Management, Inc. do not oppose the withdrawal of The Tracy Law Group PLLC as counsel of record for Debtor.

However, Creditors Bradley S. Cohen and Cohen Asset Management, Inc. object to the return of any funds held in trust by The Tracy Law Group PLLC to Diane Erdmann, the live-in girlfriend of Ross B. Hansen, Debtor’s sole owner and officer. The assertion that the funds were somehow Ms. Erdmann’s private funds is highly

RESPONSE BY CREDITORS BRADLEY S.
COHEN AND COHEN ASSET MANAGEMENT
INC. TO MOTION TO WITHDRAW AS
ATTORNEY FOR DEBTOR - 1

TIFFANY & BOSCO, P.A.
CAMELBACK ESPLANADE II, SEVENTH FLOOR
2525 EAST CAMELBACK ROAD
PHOENIX, ARIZONA 85016-4229
(602) 255-6000 TEL
(602) 255-0103 FAX

1 suspect under all circumstances and the funds should be deposited with the Court
2 pending determination of this issue.

3 Creditors Bradley S. Cohen and Cohen Asset Management, Inc. also object to
4 the payment of any post-petition fees to The Tracy Law Group PLLC.

5 DATED this 19th day of April, 2016.

6
7 TIFFANY & BOSCO, P.A.

8
9 /s/ Robert D. Mitchell

10 By: _____
11 Robert D. Mitchell, admitted pro hac vice
12 Sarah K. Deutsch, admitted pro hac vice
13 Attorneys for Bradley S. Cohen and
14 Cohen Asset Management, Inc.

15 DATED this 19th day of April, 2016.

16
17 MONTGOMERY PURDUE BLANKINSHIP
18 & AUSTIN PLLC

19 /s/ Joseph A. Hamell

20 By: _____
21 Michael E. Gossler
22 WA State Bar No. 11044
23 Joseph A. Hamell
24 WA State Bar No. 29423
25 Attorneys for Bradley S. Cohen and
26 Cohen Asset Management, Inc.

RESPONSE BY CREDITORS BRADLEY S.
COHEN AND COHEN ASSET MANAGEMENT
INC. TO MOTION TO WITHDRAW AS
ATTORNEY FOR DEBTOR - 2

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify and declare under penalty of perjury that on April 19, 2016, I
3 electronically filed the foregoing with the Clerk of Court for filing and uploading to the
4 CM/ECF system which will send notification of such filing to all parties of record.

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6 /s/ Robert D. Mitchell
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RESPONSE BY CREDITORS BRADLEY S.
COHEN AND COHEN ASSET MANAGEMENT
INC. TO MOTION TO WITHDRAW AS
ATTORNEY FOR DEBTOR - 3

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