

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

IN RE:)	
)	CASE NO. 05-30432
IAN THOW)	
)	MOTION TO SEAL DOCUMENTS
Debtors,)	AND/OR STAY PRODUCTION OF
_____)	DOCUMENTS

COMES NOW Ian Thow, by and through his attorney, and moves the court and states as follows:

The foreign representative in these proceedings, Wolridge Mahon Ltd, filed a motion in this court ex parte on or about December 21, 2006, to conduct a 2004 examination of the debtor and to require the debtor to produce certain records, documents, and information regarding the debtor's financial affairs after the filing of the petition herein.

In that package of materials submitted to the Court is a Subpoena Duces Tecum, issued to Wells Fargo Bank to require Wells Fargo Bank to produce the debtor's bank account records, cancelled checks, and other financial information for the debtor's financial affairs after the filing of these proceedings.

Immediately after receiving notice of the Ex-parte Order, on or about January 5, 2007, the debtor made a motion to vacate the order. Said matter was duly scheduled for hearing on January 25, 2007, at 9:30 a.m.

Because of a conflict with the court's calendar, the court has continued the matter to February 12, 2007, at 10:30 a.m. Notwithstanding the motion to vacate, on or about January 10, 2007, the foreign representative served a Subpoena Duces Tecum on Wells Fargo Bank to produce the debtor's records and documents, which are subject to the debtor's motion to vacate.

The Bank has answered the subpoena. Pending the hearing on February 12, 2007, (or

1 as may be continued thereafter) it is requested that the court issue an order that said
2 documents now in the hands of the personal representatives and/or its attorneys, be “sealed
3 in-house”, and that said records may not be reviewed, disclosed, copied, disseminated, or
4 otherwise given or provided to any third parties except upon further order of the court.

5 Time is of the essence on this motion. This motion is supported by the Declaration of
6 Ian Thow filed in these proceedings on or about January 5, 2007.

7 DATED this 23rd day of January, 2007.

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9 /s/ Larry B. Feinstein

10 Larry B. Feinstein WSBA # 6074
11 Attorney for Respondent
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