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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN  
JUDGMENT RENDERED IN THE CASE OF

NORTHWEST BANK f/k/a NORTHWEST  
SAVINGS BANK, a Pennsylvania Financial  
Institution,

Plaintiff,

v.

COVER CROP SOLUTIONS, LLC,

Defendant.

Case No. 15CV20664

REQUEST FOR SALE AND  
INSTRUCTIONS TO SHERIFF ON  
EXECUTION OF PERSONAL  
PROPERTY

TO: SHERIFF OF POLK COUNTY

1. Pursuant to ORS 18.755, Garnishor Northwest Bank ("Garnishor") requests the sale of personal property being held by Garnishee McKee Family Farms, L.L.C., dba McKee River Ranch and Bruce McKee ("Garnishee") as stated in the Garnishee's Amended Response, dated April 6, 2016. That amended response was made to a Writ of Garnishment issued on April 4, 2016, based on the foreign judgment transcribed in the above-mentioned case. You are hereby instructed to levy, secure and sell the personal property described as follows:

1,427,640 pounds of seed, described in the attached Schedule A

2. The physical address where the personal property is being held is a warehouse located at 11640 Elkins Road, Monmouth, Oregon, Polk County, 97361. The property

1 described herein is not residential property and no order is required for the sale of this property  
2 under ORS 18.904. No portion of the property to be levied on is a condominium unit,  
3 manufactured dwelling, or floating home held as inventory for sale or lease in the regular course  
4 of business and no portion of the property to be levied on is intangible personal property.

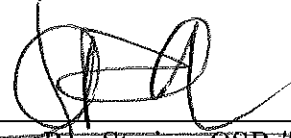
5 3. Notice of sale is to be given to the public by advertisement the manner provided  
6 by law and to the following:

JUDGMENT DEBTOR:	COVER CROP SOLUTIONS, LLC 201 EAST OREGON ROAD LITITZ, PA 17543
JUDGMENT DEBTOR REGISTERED AGENT	COVER CROP SOLUTIONS, LLC C/O REGISTERED AGENT 679 HILLDALE ROAD HOLTWOOD, PA 17532
JUDGMENT DEBTOR'S ATTORNEY	AARON HOLLIS, ESQ. BLAKINGER, BYLER AND THOMAS, P.C. 28 PENN SQUARE LANCASTER, PA 17603
ALLEGED LIEN CLAIMANTS & OTHER INTERESTED PARTIES	SEE SCHEDULE B
JUDGMENT CREDITOR'S ATTORNEY	JAMES RAY STREINZ, ESQ. STREINZ LAW OFFICE 7830 SW 40TH AVENUE, SUITE 1 PORTLAND, OR 97219  JONATHAN M. RADMACHER MCEWEN GISVOLD LLP 1100 SW SIXTH AVENUE, SUITE 1600 PORTLAND, OR 97204

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23 4. Please instruct Garnishee to hold the property pending sale pursuant to ORS  
24 18.755(4)(a). Please post the notice of the sale in 3 public places, and please notice the alleged  
25 lien claimants shown on Schedule B by first-class U.S. Mail.

1           5.       Please provide a statement of fees and costs for the sale pursuant to ORS  
2 18.755(3). You are also instructed and requested to perform any other acts that are required by  
3 law to be performed in respect to the levy and execution of the above property.

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Of Attorneys for Garnishor Northwest Bank

**SCHEDULE A**  
**Seed Inventory**

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<b>CROP</b>	<b>PACK</b>	<b>LOT NUMBER</b>	<b>POUNDS</b>
TILLAGE MAX BRISTOL	SHP.TOTE	13/10/000046	14,000
TILLAGE MAX BRISTOL	50BR	14-10-000119	132,750
TILLAGE MAX BRISTOL	50BR	14-10-000120	4,550
TILLAGE MAX CHARLOTTE	50BR	14-10-000131	1,350
TILLAGE MAX CHARLOTTE	50BR	14-10-000133	25,500
TILLAGE MAX DAYTONA	SHP.TOTE	14-10-000081	24,000
TILLAGE MAX DAYTONA	50BR	14-10-000117	18,350
TILLAGE MAX DAYTONA	SHP.TOTE	CCS-131020	2,000
TILLAGE MAX HOMESTEAD	50BR	14-10-000118	5,900
TILLAGE MAX INDY	SHP.TOTE	14-10-000129	2,000
TILLAGE MAX TALLEDEGA	50BR	14-10-000130	1,850
TILLAGE MAX TALLEDEGA	50BR	14-10-000132	41,500
<b>TOTAL BLENDS:</b>			<b>273,750</b>
<b>ANNUAL RYEGRASS</b>			
ROOT MAX ANNUAL RG	WHSE.TOTE	B49-14-10A1	6,000
ROOT MAX ANNUAL RG	WHSE.TOTE	B49-14-11A2	7,500
ROOT MAX ANNUAL RG	50PP	L175-13-127PP	27,600
ROOT MAX ANNUAL RG	50PP	L175-13-127PP	3,700
ROOT MAX ANNUAL RG	SHP.TOTE	L175-13-131PP	450
ROOT MAX ANNUAL RG	50BR	L175-13-135PP	2,100
ROOT MAX ANNUAL RG	50PP	L192-13-701	13,950
ROOT MAX ANNUAL RG	50BR	L77-14-A8	2,000
ROOT MAX ANNUAL RG	50PP	L77-14-A8	3,500
ROOT MAX ANNUAL RG	50PP	L77-14-A9	12,500
ROOT MAX ANNUAL RG	50BR	P43-13-25	10,500
ROOT MAX ANNUAL RG	50PP	P43-14-137	55,000
ROOT MAX ANNUAL RG	50PP	P43-14-141	46,800
ROOT MAX ANNUAL RG	50PP	U17-13-RH313	7,250
ROOT MAX ANNUAL RG	50PP	U17-13-RH313-1	1,700
ROOT MAX ANNUAL RG	50PP	W8-13-ARG-301	55,000
ROOT MAX ANNUAL RG	50PP	W8-13-ARG-301A	25,350
<b>TOTAL ROOT MAX:</b>			<b>280,900</b>
<b>CRIMSON CLOVER</b>			
VNS CRIMSON CLOVER	WHSE.TOTE	W12-13-CC-51-C	112
VNS CRIMSON CLOVER	WHSE.TOTE	W6-13-CC4-C	25,680
VNS CRIMSON CLOVER	50PP	W8-13-CC336-C	14,750
VNS CRIMSON CLOVER	WHSE.TOTE	W8-13-CC336-C	27,220

1	VNS CRIMSON CLOVER	SHP.TOTE	Y41-13-CC-26-C	22,950
			<b>TOTAL CRIMSON:</b>	<b>90,712</b>
2	<b>PERSIAN CLOVER</b>			
3	VNS PERSIAN CLOVER	SHP.TOTE	S-1617-C	17,350
	VNS PERSIAN CLOVER	50PP	S1617-C2-1422	450
4	VNS PERSIAN CLOVER	SHP.TOTE	S1617-C2-1422	43,000
			<b>TOTAL PERSIAN:</b>	<b>60,800</b>
5				
6	<b>RADISH</b>			
	FOUNDATION SDSTK			
7	RADISH	50PP	M50-12-21648	32,400
	FOUNDATION SDSTK			
8	RADISH	50PP	M50-12-91636	850
	FOUNDATION SDSTK			
9	RADISH	50PP	M50-12-91636	100
	FOUNDATION SDSTK			
10	RADISH	50PP	M50-12-91636-A	2,250
			<b>TOTAL FOUNDATION SDSTK:</b>	<b>35,600</b>
11				
12	TILLAGE RADISH	50BR	U134B	30,800
13	TILLAGE RADISH	50BR	U134H	43,200
14	TILLAGE RADISH	50PP	02-1417	3,645
	TILLAGE RADISH	50PP	M50-13-92109	14,077
15	TILLAGE RADISH	50PP	M50-13-92109-A	56,000
	TILLAGE RADISH	50PP	M50-13-92109B	56,000
16	TILLAGE RADISH	50PP	M50-13-92109C	56,000
	TILLAGE RADISH	50PP	M50-13-92109D	42,600
17	TILLAGE RADISH	50PP	M50-13-92109E	17,000
	TILLAGE RADISH	50PP	M50-13-92109F	4,200
18	TILLAGE RADISH	50PP	P13109	29,150
19	TILLAGE RADISH	50BR	P75-12-RAD151	50
20	TILLAGE RADISH	50BR	P75-13-RAD345	220
	TILLAGE RADISH	LGTOTE	P75-13-RAD378	17,135
21	TILLAGE RADISH	SHP.TOTE	P75-13-RAD379	38,000
	TILLAGE RADISH	SHP.TOTE	P75-13-RAD380	8,000
22	TILLAGE RADISH	50BR	P75-13-RAD393	100
23	TILLAGE RADISH	50BR	U134C	5,500
	TILLAGE RADISH	50BR	WH12-144	7,000
24	TILLAGE RADISH	LGTOTE	Y38-13-RA03	15,000
	TILLAGE RADISH	50BR	Y9-13-RAD550	450
25	TILLAGE RADISH	LGTOTE	Y9-13-RAD551	14,500
26				

1	TILLAGE RADISH	LGTOTE	Y9-13-RAD552	14,500
2	TILLAGE RADISH	LGTOTE	Y9-13-RAD563	17,620
	TILLAGE RADISH	50BR	Y9-13-RAD570	6,250
3	TILLAGE RADISH	LGTOTE	Y9-13-RAD585	57,000
4	TILLAGE RADISH	25KG	Y9-13-RAD586	6,665
	TILLAGE RADISH	LGTOTE	Y9-13-RAD589	57,000
5	TILLAGE RADISH	LGTOTE	Y9-13-RAD598	14,522
	VALUE RADISH	50PP	P75-13-RAD370-V	40
6	VALUE RADISH	50PP	P75-13-RAD384-V	255
			<b>TOTAL RADISH:</b>	<b>632,479</b>
7	<b>SUNN HEMP</b>			
8	TILLAGE SUNN HEMP	50BR	MEI-007	50
			<b>TOTAL SUNN HEMP:</b>	<b>50</b>
9	<b>VETCH</b>			
10	HAIRY VETCH	50PP	HM1422	5,550
	HAIRY VETCH	50PP	HM1423	44,000
11	HAIRY VETCH	50PP	W6-13-HV-1	3,627
	HAIRY VETCH	50PP	W6-13-HV-14	172
12			<b>TOTAL HAIRY:</b>	<b>53,349</b>
13			<b>TOTAL SEED</b>	
			<b>INVENTORY:</b>	<b>1,427,640</b>
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**SCHEDULE B**

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19 Riddell Farms, Inc.  
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|---|---|
| <p>1 T.A. Seeds<br/>3 9 Seeds Lane<br/>2 Jersey Shore, PA 17740<br/>3<br/>4 c/o BC Agent Services, Inc.<br/>5 1200 Main Street<br/>6 3300 One KC Place<br/>7 Kansas City, MO 64105<br/>8<br/>9 Cedar Meadow Farm<br/>10 679 Hilldale Road<br/>11 Holtwood, PA 17532<br/>12<br/>13 Steven L. Groff<br/>14 679 Hillsdale Road<br/>15 Holtwood, PA 17532<br/>16<br/>17 Wells Fargo Bank, NA<br/>18 PO Box 2705 Winston<br/>19 Salem NC 27199<br/>20<br/>21 Ben Vandyke Farms, Inc.<br/>22 C/O Steven D. Olson<br/>23 Tonkon Torp LLP<br/>24 1600 Pioneer Tower<br/>25 888 SW Fifth Avenue<br/>26 Portland, OR 97204-2099<br/>27<br/>28 Larry Burger<br/>29 C/O Steven D. Olson<br/>30 Tonkon Torp LLP<br/>31 1600 Pioneer Tower<br/>32 888 SW Fifth Avenue<br/>33 Portland, OR 97204-2099<br/>34<br/>35 Carlton Seed, L.L.C.<br/>36 C/O Steven D. Olson<br/>37 Tonkon Torp LLP<br/>38 1600 Pioneer Tower<br/>39 888 SW Fifth Avenue<br/>40 Portland, OR 97204-2099<br/>41<br/>42<br/>43<br/>44<br/>45<br/>46</p> | <p>Creekside Valley Farms, LLC<br/>C/O John T. Bridges<br/>Brown, Tarlow, Bridges &amp; Palmer, PC<br/>595 First Street<br/>Newberg, Oregon 97132<br/><br/>Deerhaven Farms, Inc.<br/>David A. Jacobs<br/>Luvaas Cobb<br/>777 High St., Ste. 300<br/>PO Box 10747<br/>Eugene, OR 97440<br/><br/>Dean C. Dodson<br/>C/O Steven D. Olson<br/>Tonkon Torp LLP<br/>1600 Pioneer Tower<br/>888 SW Fifth Avenue<br/>Portland, OR 97204-2099<br/><br/>Clarke Ellingson<br/>C/O Steven D. Olson<br/>Tonkon Torp LLP<br/>1600 Pioneer Tower<br/>888 SW Fifth Avenue<br/>Portland, OR 97204-2099<br/><br/>Gehring Farms<br/>C/O Steven D. Olson<br/>Tonkon Torp LLP<br/>1600 Pioneer Tower<br/>888 SW Fifth Avenue<br/>Portland, OR 97204-2099<br/><br/>Hawman Farms, Inc.<br/>dba Riverview Seed Company<br/>C/O Sanford R. Landress<br/>Greene &amp; Markley PC<br/>1515 SW 5th Ave., Ste 600<br/>Portland, OR 97201</p> |
|---|---|

1 Integrated Seed Growers, L.L.C.  
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24 David L. Weaver  
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14 Prairie Creek Seed  
15 21995 Fillmore Road  
16 Cascade, IA 52033

17 Lacrosse Seed  
18 2541 Commerce Street  
19 La Crosse, WI 54603

20 Big Cob Hybrids  
21 990 Cottonwood Street  
22 Seward, NE 68434

23 Northwest Farm Credit Services  
24 Attn: Mickey F. Hatley  
25 650 Hawthorne Avenue SE, Suite 210  
26 Salem, OR 97301-5895

27 Don Worth  
28 Saddle Butte Ag, Inc.  
29 P.O. Box 50  
30 Shedd, OR 97377

31 Elroy's Friendly Acres  
32 Box 477 Saltcoats  
33 Saskatchewan, Canada SOA 3R0

34 Center Seeds  
35 PO Box 106  
36 Minster, OH 45865

Star Seed  
PO Box 228  
101 Industrial A venue  
Osborne, KS 67473

Sanders  
518 North Sharpe A venue  
Cleveland, MS 38732

Walnut Creek Seeds LLC  
6100 Basil Western Road  
Carroll, OH 43112

Aaron D. Hollis, Esq.  
Blakinger, Byler & Thomas, P.C.  
28 Penn Square  
Lancaster, PA 17603

Metro Bank  
3801 Paxton Street  
Harrisburg PA 17111

Blue Moon Farms, L.L.C.  
Virginia Lehman, Registered Agent  
33754 Tennessee Road  
Lebanon, OR 97355

Don Kelley  
[dkelley@kelleyattorneys.com](mailto:dkelley@kelleyattorneys.com)

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN JUDGMENT	)	
RENDERED IN THE CASE OF	)	<b>WRIT OF GARNISHMENT</b>
	)	
NORTHWEST BANK f/k/a NORTHWEST SAVINGS	)	<b>(MCKEE FAMILY FARMS, L.L.C.</b>
BANK, a Pennsylvania Financial Institution,	)	<b>dba MCKEE RIVER RANCH)</b>
Plaintiffs,	)	
	)	Case No. 15CV20664
v.	)	
	)	
COVER CROP SOLUTIONS, LLC,	)	
	)	
Defendant.	)	

TO: **McKee Family Farms, L.L.C.**  
**dba McKee River Ranch**  
**c/o Bruce McKee**  
**11640 Elkins Road**  
**Monmouth, OR 97361**

**McKee Family Farms, L.L.C.**  
**Attn: Michael G. Cowgill, Registered Agent**  
**130 W First Avenue**  
**Albany, Oregon 97321**

You are now a Garnishee. AS A GARNISHEE, YOU NEED TO KNOW THE FOLLOWING:

**COVER CROP SOLUTIONS, LLC** (who is called the "Debtor") owes money to **NORTHWEST BANK f/k/a NORTHWEST SAVINGS BANK** (who is called the "Creditor"). A judgment was entered against the Debtor in Lancaster County in the Commonwealth of Pennsylvania for the debt, or the debt otherwise became subject to garnishment on April 24, 2015 (the "Underlying Judgment"). The Underlying Judgment was subsequently transcribed to and entered in the Circuit Court of Polk County in the State of Oregon against the Debtor for the debt on August 5, 2015. The Debtor's tax identification number is 27-2252441. The Debtor's Pennsylvania entity number is 3944819.

The amount subject to garnishment is **\$6,624,956.09**

This writ garnishes all of the following:

- Wages that you owe the Debtor at the time this writ is delivered to you, and all wages that the Debtor earns during the 90-day period following the date on which you receive this writ.
- All property of the Debtor (including money) that is in your possession, control or custody at the time this writ is delivered to you
- All debts that you owe the Debtor at the time this writ is delivered to you, whether or not payment is due on the debt at the time you receive this writ.

**YOU MUST ANSWER THIS WRIT BY COMPLETING THE ATTACHED GARNISHEE RESPONSE WITHIN THE TIME ALLOWED BY LAW, WHETHER OR NOT YOU HOLD ANY OF THE DEBTOR'S PROPERTY OR OWE ANYTHING TO THE DEBTOR. IF YOU DO NOT TRUTHFULLY ANSWER THIS WRIT, OR YOU DO NOT DELIVER MONEY OR PROPERTY WHEN YOU ARE REQUIRED TO DO SO, YOU WILL BE LIABLE TO THE CREDITOR.**

If you have questions, you should contact an attorney. Court employees cannot give you legal advice. The Creditor's attorney cannot give you legal advice.

A writ of garnishment may be issued only by the court administrator, by the attorney for the Creditor or by a person who is specifically authorized by law to issue garnishments. This writ is issued by:

  X   The attorney for the Creditor  
Name and title: Kimberly A. Stuart, Attorney at Law  
Statutory authority to issue writ: 18.635(3)

This writ is valid only if it has been delivered to you within 60 days after the date of issuance. If the court administrator is issuing this writ, the date of issuance is the date the court administrator signs the writ (see "COURT SEAL" below). If this writ is issued by any other person, the date of issuance is the date on which the issuer signs the certification (see "CERTIFICATION" below).

**IMPORTANT ADDRESSES**  
(see Step 2 of Instructions to Garnishee form)

Debtor:

Cover Crop Solutions  
201 East Oregon Road  
Lititz, PA 17543

Debtor Attorney:

Aaron D. Hollis  
Blakinger, Byler and Thomas, P.C.  
28 Penn Square  
Lancaster, PA 17603  
Telephone number: 717-299-1100  
Pennsylvania State Bar number: 89297

Debtor's Registered Agent:

Cover Crop Solutions, LLC  
D. Eric Weaver, Manager & Registered Agent  
Road 679 Hilldale Road  
Holtwood, PA 17532

Garnishor/Attorney for Creditor:

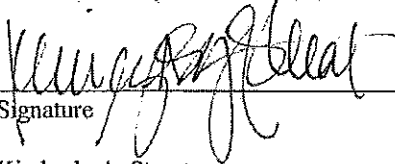
Kimberly A. Stuart  
McEwen Gisvold LLP  
1100 SW 6th Avenue, Suite 1600  
Portland Oregon 97204  
Telephone number: 503-226-7321  
Oregon State Bar number: 054685

James Ray Streinz  
Streinz Law Office  
1100 SW 6th Avenue, Suite 1600  
Portland Oregon 97204  
Telephone number: 503-621-7172  
Oregon State Bar number: 794107

**CERTIFICATION**

(The following certification must be signed by the Creditor if this writ is issued by the court administrator. In all other cases, the following certification must be signed by the person issuing the writ.)

I certify that I have read this writ of garnishment and to the best of my knowledge, information and belief, there is good ground to support issuance of the writ, and the amount indicated as subject to garnishment is lawfully subject to collection by this writ.

 \_\_\_\_\_, 2016  
Signature Date

Kimberly A. Stuart  
Oregon State Bar number: 054685

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2016, I served the foregoing copy of the Writ of Garnishment, as well as all other required documents in connection with such writ on the persons listed below by the methods indicated below.

Table with 2 columns: Recipient Information and Delivery Method. Rows include Cover Crop Solutions, LLC; Aaron D. Hollis, Blakinger, Byler and Thomas, P.C.; Bruce A. McKee; McKee Family Farms, L.L.C.; and Steven D. Olson. Delivery methods are marked with 'X' for U.S. Mail.

McEWEN GISVOLD LLP

By: [Signature] Kim Stuart, OSB No. 054685 Of Attorneys for Creditor / Garnishor



IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN JUDGMENT	)	AMENDED
RENDERED IN THE CASE OF	)	GARNISHEE RESPONSE
	)	
NORTHWEST BANK f/k/a NORTHWEST SAVINGS BANK,	)	(MCKEE FAMILY FARMS, L.L.C.
a Pennsylvania Financial Institution,	)	dba MCKEE RIVER RANCH)
Plaintiffs,	)	
	)	Case No. 15CV20664
v.	)	
	)	
COVER CROP SOLUTIONS, LLC,	)	
	)	
Defendant.	)	

RE: COVER CROP SOLUTIONS, LLC

The writ of garnishment was delivered to me on the 6th day of April, 2016. The following responses are accurate and complete as of that date.

PART I: DEBTOR'S PROPERTY GENERALLY  
(ALL GARNISHEES MUST FILL OUT THIS PORTION OF THE RESPONSE)

Place a check in front of all the following statements that apply. You may need to check more than one statement.

- I have discovered that a voluntary or involuntary bankruptcy petition has been filed by or on behalf of the Debtor after the date shown on the face of the writ as the date on which the judgment was entered against the Debtor or after the debt otherwise became subject to garnishment. (You need not complete any other part of this response, but you must sign the response and deliver it in the manner specified in Step 2 of the Instructions to Garnishee form.)
- I do not employ the Debtor, I do not have in my possession, control or custody any personal property of the Debtor, and I do not owe any debts or other obligations to the Debtor.
- I employ the Debtor. (You must complete Part II of this response.)
- I have in my possession, control or custody garnishable money that belongs to the Debtor (other than wages), or I owe a debt or other obligation to the Debtor (other than wages) that is due as of the time of this response. I am forwarding this money, or enough of it to satisfy the garnishment, to the Garnishor.
- I owe a debt or other obligation to the Debtor (other than wages) that was not due as of the time of this response but will become due within 45 days after the writ was delivered to me. I will forward the money, or enough of it to satisfy the garnishment, to the Garnishor when the debt or other obligation becomes due.
- I owe the following debt or other obligation to the Debtor (other than wages) that will not become due within 45 days after the date that the writ was delivered to me. I will not make any payments on the debt or obligation until I receive instructions from the Sheriff or until 30 days have passed from the date on which I deliver this response. (See Instructions to Garnishee form.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

X I have in my possession, control or custody the following personal property (other than money) that belongs to the Debtor. I will hold all of the property for the Garnishor until I receive instructions from the Sheriff or until 30 days have passed from the date on which I deliver this response. (See Instructions to Garnishee form.)

See attached Exhibit A, Exhibit A-1, Exhibit A-2, and Exhibit B.

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I may owe money to or hold property of the Debtor, but I am not sure what or how much it might be. (You must provide an explanation in the following space and you must deliver an amended response when you find out. You must deliver an amended response even if you find out that you have no property of the Debtor or owe no money to the Debtor.)

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(FINANCIAL INSTITUTIONS ONLY) We hold one or more accounts for the Debtor, of which \$\_\_\_\_\_ is not subject to garnishment under ORS 18.784. We are forwarding all other garnishable amounts, or enough of it to satisfy the garnishment, to the Garnishor.

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The writ of garnishment delivered to me, on its face, does not comply with the Oregon laws governing writs of garnishment, or I cannot determine the identity of the Debtor from the information in the writ. (You must provide an explanation in the following space.)

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I have received an order to withhold income that applies to the income of the Debtor. The order to withhold income has priority over the writ of garnishment, and compliance with the order will reduce or eliminate the money that I would otherwise deliver under the writ. (Provide details, including the name of the agency serving the order to withhold income, the date the order was served on you and the amount to be withheld. If you employ the Debtor, you must still complete Part II of this response.)

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I have received notice of a challenge to the garnishment. I will deliver to the court administrator all money that I would otherwise deliver to the Garnishor. (See Step 3 of Instructions to Garnishee form.)

Other (Explain)

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PART II: DEBTOR'S EMPLOYER  
(GARNISHEES WHO EMPLOY THE DEBTOR MUST FILL OUT THIS PORTION OF THE RESPONSE)

Place a check in front of all the following statements that apply. You may need to check more than one statement.  
NOTE: THE LAW PROHIBITS DISCHARGE OF THE DEBTOR FROM EMPLOYMENT BY REASON OF GARNISHMENT.

I employ the Debtor. The Debtor is paid on a \_\_\_\_\_ basis (insert "weekly," "monthly" or other pay period). Wages will next be payable to the Debtor on the \_\_\_ day of \_\_\_\_\_, 2\_\_\_. I will complete a Wage Exemption Calculation form for each payment of wages that is made during the 90-day period immediately following the date that the writ of garnishment was delivered to me. I will also complete a Wage Exemption Calculation form for the payday immediately following the end of the 90-day period. I will forward to the Garnishor on each of these occasions those wages calculated to be subject to garnishment, or enough of those wages to satisfy the garnishment.

I had already received a writ of garnishment from another Garnishor before this writ was delivered to me. Under Oregon law, the previous writ has priority. The previous writ will terminate on the \_\_\_ day of \_\_\_\_\_, 2016.

I hereby certify that I have fully and accurately completed this garnishee response.

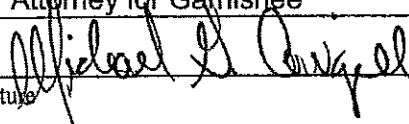
Dated August 2, \_\_\_\_\_, 2016

Name of Garnishee: McKee Family Farms, L.L.C.

By: Michael G. Cowgill, OSB #781682

Its: Attorney for Garnishee

Signature



Telephone number: (541) 926-2255

Fax number (if available): 541-967-6579

Warehouse at 11640 Elkins Road, Monmouth, OR 97361  
Address

## EXHIBIT A TO THE AMENDED GARNISHEE RESPONSE

This Amended Garnishee Response amends the original Garnishee Response dated April 12, 2016.

All 2012, 2013, and 2014 seed presently in the possession of McKee Family Farms, L.L.C. ("McKee Family Farms") in which the Debtor may have some right, title, and interest, is subject to the priority claims of McKee Family Farms, which claims include, but are not limited to, the following:

1. McKee Family Farms claims a first priority possessory chattel lien pursuant to the provisions of ORS 87.152 securing all sums owed by the Debtor to McKee Family Farms, senior and superior to the claims of the Debtor, Plaintiff, and any other third parties arising from or related to the following:
  - (a) All sums owed to McKee Family Farms for the production of the 2014 radish seed crop produced by McKee Family Farms;
  - (b) All sums owed to McKee Family Farms for all seed cleaning, testing, bagging, storage, and other services arising from or related to the 2014 radish seed produced by McKee Family Farms;
  - (c) All sums owed to McKee Family Farms for all seed cleaning, testing, bagging, storage, and other services related to the 2014 radish seed produced by all other growers;
  - (d) All sums owed to McKee Family Farms for all seed cleaning, testing, bagging, storage, and other services related to all other 2012, 2013 and 2014 seed; and
  - (e) All costs and disbursements awarded to McKee Family Farms in the lawsuit filed by the Plaintiff against McKee Family Farms and other Defendants entitled Northwest Bank f/k/a Northwest Savings Bank v. McKee Family Farms, LLC, et al., U.S. District Court Case No. 3:15-CV-01576-MO ("Lawsuit").

2. The Lawsuit was tried before the Honorable Michael Moseman, U.S. District Court judge, on June 6, 2016. Judge Moseman rendered his decision and attached as Exhibit A-1 is a copy of the Minutes that has been entered in the Lawsuit.

3. Subsequent to the completion of the trial, McKee Family Farms and the Plaintiff have agreed that certain 2012 and 2013 seed which has been purchased and paid for, which in the possession of McKee Family Farms, should rightfully be sold by the Polk County Sheriff, in the manner provided by law. Attached as Exhibit A-2 and incorporated herein by this reference, is the inventory of the 2012 and 2013 seed which the Plaintiff and McKee Family Farms have agreed should be sold by the Polk County

Sheriff pursuant to the Writ of Garnishment. Any and all other seed, including the 2014 seed, is not to be sold by the Sheriff and is not subject to the Writ of Garnishment.

4. McKee Family Farms has a first priority possessory chattel lien against the 2012 and 2013 seed that will be sold at the Sheriff's sale, senior and superior to the claim of the Bank, as more fully described in Exhibit B. As of June 30, 2016, McKee Family Farms' possessory chattel lien was in the amount of \$59,397.30. The per diem charges are accruing at the rate of \$103.00 from July 1, 2016 through the completion of the Sheriff's sale, as more fully described in Exhibit B.

n:\atty\mgc\llc\mckee family farms, llc\northwest bank v\garnishment\exhibit a to garnishee response.amended.docx

**From:** [info@ord.uscourts.gov](mailto:info@ord.uscourts.gov)  
**To:** [nobody@ord.uscourts.gov](mailto:nobody@ord.uscourts.gov)  
**Subject:** Activity in Case 3:15-cv-01576-MO Northwest Bank v. McKee Family Farms, LLC et al Court Trial - Completed  
**Date:** Monday, June 06, 2016 5:10:48 PM

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**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

District of Oregon

### Notice of Electronic Filing

The following transaction was entered on 6/6/2016 at 5:09 PM PDT and filed on 6/6/2016

**Case Name:** Northwest Bank v. McKee Family Farms, LLC et al

**Case Number:** 3:15-cv-01576-MO

**Filer:**

**Document Number:** 268(No document attached)

#### Docket Text:

**MINUTES of Proceedings: Court Trial held. Plaintiff's Oral Motion to Dismiss Defendants Doerfler Farms, Dan Fanning, and Scharf Farms GRANTED. The dismissal is with prejudice as to the question of priority. Witnesses sworn and evidence adduced. Plaintiff rests. Defendants Motion for Judgment as a Matter of Law with respect to Carlton's Agricultural Services Lien is GRANTED. Defendants' Motion for Judgment as a Matter of Law as to all other claims is DENIED. Defendants present witnesses and evidence. Closing arguments given. I find for Defendants as stated on the record. Pending motions, including the Request for Judicial Notice[267], are DENIED AS MOOT. Jonathan M. Radmacher and James Ray Streinz present as counsel for plaintiff(s). Paul W. Conable, Alexander M. Tinker, John Bridges and Michael Cowgill present as counsel for defendant(s). Court Reporter: Bonita Shumway. Chief Judge Michael W. Mosman presiding. (dls)**

**3:15-cv-01576-MO Notice has been electronically mailed to:**

Alexander M. Tinker [alex.tinker@tonkon.com](mailto:alex.tinker@tonkon.com), [joan.crichton@tonkon.com](mailto:joan.crichton@tonkon.com)

Brooks F. Cooper [brooks@draneaslaw.com](mailto:brooks@draneaslaw.com), [sara@bcooper-law.com](mailto:sara@bcooper-law.com)

Christopher B. Matheny [cmatheny@fetherstonedmonds.com](mailto:cmatheny@fetherstonedmonds.com)

**EXHIBIT - A-1**  
**Page 1 of 2**

David A. Foraker david.foraker@greenemarkley.com,  
mena.ravassipour@greenemarkley.com

F. James Healy jhealy@healyandmccann.com, jmk@healyandmccann.com

James Ray Streinz ray@streinzlaw.com

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lori.pavey@greenemarkley.com

Scott G. Cowgill scowgill@wtlegal.com, kmcgie@wtlegal.com

Steven D. Olson steven.olson@tonkon.com, judy.champlin@tonkon.com

**3:15-cv-01576-MO Notice will not be electronically mailed to:**

Matt Parker(Terminated)  
35869 Bohlken Drive  
Lebanon, OR 97355

## COVER CROP SOLUTIONS INVENTORY

As of 7/14/2016

DATE	WHSE	CROP	PACK	LOT #	POUNDS
12/31/2015	1F	TILLAGE MAX BRISTOL	SHP.TOTE	13/10/000046	14,000
08/09/2014	1E	TILLAGE MAX BRISTOL	50BR	14-10-000119	132,750
08/09/2014	1E	TILLAGE MAX BRISTOL	50BR	14-10-000120	4,550
09/19/2014	1B	TILLAGE MAX CHARLOTTE	50BR	14-10-000131	1,350
10/29/2014	1E	TILLAGE MAX CHARLOTTE	50BR	14-10-000133	25,500
10/31/2014	1D	TILLAGE MAX DAYTONA	SHP.TOTE	14-10-000081	24,000
12/31/2015	1F	TILLAGE MAX DAYTONA	50BR	14-10-000117	18,350
07/31/2014	1A	TILLAGE MAX DAYTONA	SHP.TOTE	CCS-131020	2,000
08/06/2014	1D	TILLAGE MAX HOMESTEAD	50BR	14-10-000118	5,900
10/31/2014	1D	TILLAGE MAX INDY	SHP.TOTE	14-10-000129	2,000
09/18/2014	1E	TILLAGE MAX TALLEDEGA	50BR	14-10-000130	1,850
10/21/2014	1B	TILLAGE MAX TALLEDEGA	50BR	14-10-000132	41,500
<b>TOTAL BLENDS:</b>					<b>273,750</b>
<b>ANNUAL RYEGRASS</b>					
06/01/2015	1A	ROOT MAX ANNUAL RG	WHSE.TOTE	B49-14-10A1	6,000
06/09/2015	1A	ROOT MAX ANNUAL RG	WHSE.TOTE	B49-14-11A2	7,500
04/30/2015	1B	ROOT MAX ANNUAL RG	50PP	L175-13-127PP	27,600
11/30/2014	AISGC	ROOT MAX ANNUAL RG	50PP	L175-13-127PP	3,700
08/04/2014	1E	ROOT MAX ANNUAL RG	SHP.TOTE	L175-13-131PP	450
08/20/2014	1F	ROOT MAX ANNUAL RG	50BR	L175-13-135PP	2,100
02/27/2014	1C	ROOT MAX ANNUAL RG	50PP	L192-13-701	13,950
12/31/2015	1D	ROOT MAX ANNUAL RG	50BR	L77-14-A8	2,000
08/04/2014	1C	ROOT MAX ANNUAL RG	50PP	L77-14-A8	3,500
12/31/2015	1B	ROOT MAX ANNUAL RG	50PP	L77-14-A9	12,500
05/30/2015	2C	ROOT MAX ANNUAL RG	50BR	P43-13-25	10,500
07/15/2015	2C	ROOT MAX ANNUAL RG	50PP	P43-14-137	55,000
07/15/2015	2C	ROOT MAX ANNUAL RG	50PP	P43-14-141	46,800
05/21/2014	AISGC	ROOT MAX ANNUAL RG	50PP	U17-13-RH313	7,250
05/21/2014	AISGC	ROOT MAX ANNUAL RG	50PP	U17-13-RH313-1	1,700
12/31/2015	1D	ROOT MAX ANNUAL RG	50PP	W8-13-ARG-301	55,000
12/31/2015	1D	ROOT MAX ANNUAL RG	50PP	W8-13-ARG-301A	25,350
<b>TOTAL ROOT MAX:</b>					<b>280,900</b>
<b>CRIMSON CLOVER</b>					
12/31/2015	1A	VNS CRIMSON CLOVER	WHSE.TOTE	W12-13-CC-51-C	112
10/31/2014	1B	VNS CRIMSON CLOVER	WHSE.TOTE	W6-13-CC4-C	25,680
06/08/2015	2B	VNS CRIMSON CLOVER	50PP	W8-13-CC336-C	14,750
07/31/2014	1D	VNS CRIMSON CLOVER	WHSE.TOTE	W8-13-CC336-C	27,220
09/16/2014	1B	VNS CRIMSON CLOVER	SHP.TOTE	Y41-13-CC-26-C	22,950
<b>TOTAL CRIMSON:</b>					<b>90,712</b>
<b>PERSIAN CLOVER</b>					

**EXHIBIT - A-2**

**Page 1 of 3**



08/26/2014 1A	VNS PERSIAN CLOVER	SHP.TOTE	S-1617-C	17,350
07/31/2014 1D	VNS PERSIAN CLOVER	50PP	S1617-C2-1422	450
10/31/2014 2C	VNS PERSIAN CLOVER	SHP.TOTE	S1617-C2-1422	43,000
			<b>TOTAL PERSIAN:</b>	<b>60,800</b>

**RADISH**

07/31/2014 1D	FOUNDATION SDSTK RADISH	50PP	M50-12-21648	32,400
05/21/2014 AISGC	FOUNDATION SDSTK RADISH	50PP	M50-12-91636	850
10/31/2014 O	FOUNDATION SDSTK RADISH	50PP	M50-12-91636	100
05/21/2014 AISGC	FOUNDATION SDSTK RADISH	50PP	M50-12-91636-A	2,250
			<b>TOTAL FOUNDATION SDSTK:</b>	<b>35,600</b>

08/26/2014 1B	TILLAGE RADISH	50BR	U134B	30,800
08/25/2014 1F	TILLAGE RADISH	50BR	U134H	43,200
05/21/2014 AISGC	TILLAGE RADISH	50PP	02-1417	3,645
05/15/2014 AISGC	TILLAGE RADISH	50PP	M50-13-92109	14,077
07/09/2014 3A	TILLAGE RADISH	50PP	M50-13-92109-A	56,000
07/17/2014 3A	TILLAGE RADISH	50PP	M50-13-92109B	56,000
07/16/2014 3A	TILLAGE RADISH	50PP	M50-13-92109C	56,000
07/10/2014 3A	TILLAGE RADISH	50PP	M50-13-92109D	42,600
12/31/2015 2B	TILLAGE RADISH	50PP	M50-13-92109E	17,000
07/16/2014 3A	TILLAGE RADISH	50PP	M50-13-92109F	4,200
04/30/2015 1F	TILLAGE RADISH	50PP	P13109	29,150
08/27/2013 1E	TILLAGE RADISH	50BR	P75-12-RAD151	50
10/31/2014 1C	TILLAGE RADISH	50BR	P75-13-RAD345	220
01/01/2014 4B	TILLAGE RADISH	LGTOTE	P75-13-RAD378	17,135
08/11/2014 1D	TILLAGE RADISH	SHP.TOTE	P75-13-RAD379	38,000
12/31/2015 1D	TILLAGE RADISH	SHP.TOTE	P75-13-RAD380	8,000
04/30/2015 1D	TILLAGE RADISH	50BR	P75-13-RAD393	100
08/26/2014 1B	TILLAGE RADISH	50BR	U134C	5,500
10/31/2013 1D	TILLAGE RADISH	50BR	WH12-144	7,000
06/25/2014 1E	TILLAGE RADISH	LGTOTE	Y38-13-RA03	15,000
06/03/2015 2B	TILLAGE RADISH	50BR	Y9-13-RAD550	450
02/28/2014 1C	TILLAGE RADISH	LGTOTE	Y9-13-RAD551	14,500
12/31/2015 3B	TILLAGE RADISH	LGTOTE	Y9-13-RAD552	14,500
03/31/2014 3B	TILLAGE RADISH	LGTOTE	Y9-13-RAD563	17,620
12/18/2014 2B	TILLAGE RADISH	50BR	Y9-13-RAD570	6,250
08/31/2014 STRAW	TILLAGE RADISH	LGTOTE	Y9-13-RAD585	57,000
07/08/2015 2B	TILLAGE RADISH	25KG	Y9-13-RAD586	6,665
12/31/2014 5	TILLAGE RADISH	LGTOTE	Y9-13-RAD589	57,000
02/28/2015 5	TILLAGE RADISH	LGTOTE	Y9-13-RAD598	14,522
07/07/2015 2B	VALUE RADISH	50PP	P75-13-RAD370-V	40
07/07/2015 2B	VALUE RADISH	50PP	P75-13-RAD384-V	255
			<b>TOTAL RADISH:</b>	<b>632,479</b>

**SUNN HEMP**

07/31/2014 1E	TILLAGE SUNN HEMP	50BR	MEI-007	50
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**VETCH**

10/27/2014 1C	HAIRY VETCH	50PP	HM1422	5,550
10/27/2014 1C	HAIRY VETCH	50PP	HM1423	44,000
10/31/2013 1F	HAIRY VETCH	50PP	W6-13-HV-1	3,627
04/15/2014 1D	HAIRY VETCH	50PP	W6-13-HV-14	172
			<b>TOTAL HAIRY:</b>	<b>53,349</b>

**TOTAL SEED INVENTORY: 1,427,640**

**STATEMENT**

**McKee Family Farms  
dba McKee River Ranch  
23350 SW McKee Road  
Amity, OR 97361**

Date	Invoice
6/25/2016	NWBANK/CCS

Bill to:
NorthWest Bank P.O. Box 786 100 Liberty Street Warren, PA 16365 Attn: TK Creal

Terms:
Due Prior to Sale of Seed

**Charges for CCS Purchased Inventory  
(January 1, 2015 - June 30, 2016)**

**Total Pounds: 1,427,640 lbs.**

**Storage Charges:**

1,427,640 lbs. @ \$.20/cwt/mo. \$2,855.28 per month

18 months Storage (1/1/15 - 6/30/16) \$51,395.04

Interest - 17 mos. @ 9% \$4,368.58

Daily Storage & Interest @ \$103.00 per day

**Handling Charge:**

1,427,640 lbs @ \$.15/cwt \$2,141.46

**Hauling Charges:**

20,822 lbs. @ \$.01/lb. \$208.22

**Testing/Sampling Charges:**

9 Samples to OSU Seed Testing \$25.00 ea. \$225.00

OSU Testing - germs on 9 lots \$38.00 ea. \$342.00

9 Samples to Lyn Seed Testing \$25.00 ea. \$225.00

Lyn Seed Testing - germs on 9 lots \$492.00

**Statement Total Due \$59,397.30**



CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2016, I caused to be served a true copy AMENDED

GARNISHEE RESPONSE, addressed to:

James Ray Streinz  
STREINZ LAW OFFICE  
1100 SW 6<sup>th</sup> Avenue, Suite 1600  
Portland, OR 97204

Cover Crop Solutions, LLC  
Attn: D. Eric Weaver, Manager Reg. Agent  
679 Hildale Road  
Holtwood, PA 17532

Aaron D. Hollis  
BLAKINGER BYLER & THOMAS, PC  
28 Penn Square  
Lancaster, PA 17603

Steven D. Olson  
TONKON TORP, LLP  
888 SW Fifth Avenue, Suite 1600  
Portland, OR 97204-2099

by the following method:

  X   By mailing a true copy in a sealed envelope via first-class mail, postage prepaid to the person(s) listed above, and deposited in the United States Postal Service at Albany, Oregon, on the date set forth below.

  X   By electronic mail function of the eFiling system to the email address registered with the Oregon State Bar, a true copy thereof, certified by me at: ray@streinzlaw.com

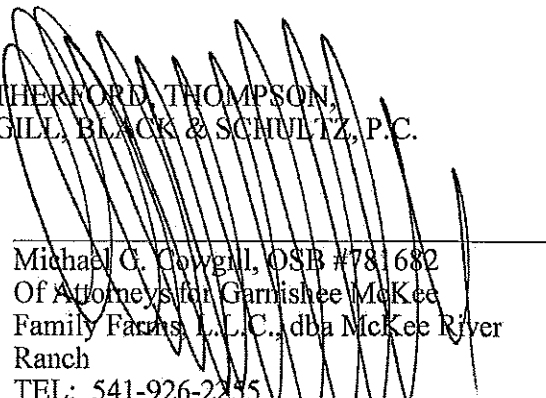
       By faxing a true copy thereof to the parties listed above at the number(s) shown, on the date set forth below.

       By emailing a true copy thereof to the parties listed above, on the date set forth below.

On this 2<sup>nd</sup> day of August, 2016

WEATHERFORD, THOMPSON,  
COWGILL, BLACK & SCHULTZ, P.C.

By:

  
Michael G. Cowgill, OSB #781682  
Of Attorneys for Garnishee McKee  
Family Farms, L.L.C., dba McKee River  
Ranch  
TEL: 541-926-2255  
FAX: 541-967-6579  
Email: mcowgill@wtlegal.com

Commonwealth of Pennsylvania, }  
County of Lancaster, } SS.:

I, Katherine Wood-Jacobs, Prothonotary of the Court of Common Pleas in and for said County, the same being a court of Law and of record, do hereby certify that the foregoing is a full, true and correct copy of the whole record of the case therein stated, wherein NORTHWEST BANK F/K/A NORTHWEST SAVINGS BANK, plaintiff(s) vs. COVER CROP SOLUTIONS, LLC defendant(s), as the same remains of Record before the said Court at No. CI-15-03747 of CONFESSION OF JUDGMENT Term A.D. 2015


**In Testimony Whereof,** I have hereunto set my hand and affixed the seal of said Court this 30<sup>TH</sup> day of JULY A.D. 2015

  
Prothonotary

Certified amount of the judgment is \$7,235,575.73 PLUS INTEREST.

---

I, Dennis E. Reinaker President Judge of Second Judicial District, composed of the County of Lancaster, do certify that Katherine Wood-Jacobs by whom the annexed record, certificate and attestation were made and given, and who in his own proper handwriting thereunto subscribed his name and affixed the seal of the Court of Common Pleas of said County, was at the time of so doing and now is Prothonotary in and for said County of Lancaster, in the Commonwealth of Pennsylvania, duly commissioned and qualified, to all of whose acts as such full faith and credit are and ought to be given as well as in courts of judicature as elsewhere, and that the said record, certificate and attestation are in due form of law, and made by the proper officer.

  
President Judge.

Commonwealth of Pennsylvania, }  
County of Lancaster, } SS.:

I, Katherine Wood-Jacobs Prothonotary of the Court of Common Pleas in and for the said County, do certify that the Honorable Dennis E. Reinaker by whom the forgoing attestation was made, and who has been thereunto subscribed his name, was at the time of making thereof and still is President Judge of the Court of Common Pleas in and for said County, duly commissioned and qualified; to all whose acts as such full faith and credit are and ought to be given, as well as in courts of judicature as elsewhere.

In Testimony Whereof I have hereunto set my hand and affixed the seal of said Court, this 31<sup>st</sup> day of JULY A.D. 2015

  
Prothonotary

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## Exemplified Record

### FROM LANCASTER COUNTY

2015 Term, No.CI-15-03747

NORTHWEST BANK, Plaintiff  
1700 ROOSEVELT AVE  
YORK, PA 17408  
F/K/A NORTHWEST SAVINGS BANK  
1700 ROOSEVELT AVE  
YORK, PA 17408

vs.

COVER CROP SOLUTIONS, LLC, Defendant  
201 E OREGON RD  
LITITZ, PA 17543

Debt, \$7,235,575.73 PLUS INTEREST  
Entered and Filed 04/24/2015  
Katherine Wood-Jacobs, Prothonotary

---

Commonwealth of Pennsylvania }  
County of Lancaster, } SS.:

Among the Records entered in the Court of Common Pleas in and for the County of Lancaster, In the commonwealth of Pennsylvania, to Term, 2015 No. CI-15-03747 is contained the following:

**Docket – Entries:**  
SEE ATTACHED

Certified amount of the judgment is \$7,235,575.73 PLUS INTEREST

---

**Judgment Index Entry**

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DEFENDENT	PLAINTIFF	WHEN ENTERED	REAL DEBT	TERM	NO.
COVER CROP SOLUTIONS LLC	NORTHWEST BANK F/K/A NORTHWEST SAVINGS BANK	04/24/2015	\$7,235,575.73 PLUS INTEREST	CI-15	03747

# PROTHONOTARY OF LANCASTER COUNTY

Katherine Wood-Jacobs  
Prothonotary

George Alspach  
Solicitor



NORTHWEST BANK (et al.)  
vs.  
COVER CROP SOLUTIONS LLC

Case Number  
CI-15-03747

## PROTHONOTARY DOCKET ENTRIES

- 04/24/2015 CONFESSION OF JUDGMENT FILED  
PURSUANT TO THE AUTHORITY CONTAINED IN THE WARRANT OF ATTORNEY, I APPEAR FOR  
DEFENDANT AND CONFESS JUDGMENT AGAINST DEFENDANT IN THE AMOUNT OF \$7,235,575.73  
PLUS INTEREST, WITH PRAECIPE FOR ASSESSMENT OF DAMAGES. PURSUANT TO PA.R.C.P.  
2950 ET SEQ. PLEASE ASSESS DAMAGES AND ENTER JUDGMENT AGAINST DEFENDANT IN THE  
AMOUNT OF \$7,235,575.73 PLUS INTEREST. FILED BY LOUISE MELCHOR, ESQ. JUDGMENT  
ENTERED AS DIRECTED BY KATHERINE WOOD-JACOBS, PROTHONOTARY.
- 04/24/2015 COMPLAINT IN CONF. JUDGMENT  
FILED BY LOUISE MELCHOR, ESQ. CERTIFICATION OF ADDRESSES, AFFIDAVIT OF VICE  
PRESIDENT OF SPECIAL ASSETS AT NORTHWEST BANK, DEAN HUYA, AFFIDAVIT OF NON  
CONSUMER CREDIT AND NON RESIDENTIAL LEASE BY DEAN HUYA. AFFIDAVIT OF NON  
MILITARY SERVICE, AFFIDAVIT OF BUSINESS TRANSACTION AND NOTICE UNDER RULE 2958.1  
OF JUDGMENT AND EXECUTION.
- 236 NOTICE TO DEFENDANT AND COPY OF SAME W/RECEPT BACK TO ATTORNEY ON APRIL 28,  
2015.  
(COPY W/CHECK TO SHERIFF ON APRIL 28, 2015.)
- 04/24/2015 PRAECIPE-ENTER APPEARANCE  
FOR THE PLAINTIFF. FILED BY LOUISE MELCHOR, ESQ.
- 04/24/2015 CAPTION ENTRY IS:  
NORTHWEST BANK F/K/A NORTHWEST SAVINGS BANK VS COVER CROP SOLUTIONS, LLC
- 04/30/2015 04/29/2015 12:00AM SERVICE WITHDRAWN ON 4/29/15 BY FAXED LETTER FROM ATTORNEY  
LOUISE MELCOR AND RETURNED BY THE SHERIFF'S OFFICE. DEFENDANT'S COUNSEL WILL  
ACCEPT SERVICE ON HIS CLIENT'S BEHALF. COPY OF LETTER REQUESTING CANCELLATION  
OF SERVICE ATTACHED. SHERIFF COSTS: \$28.00 SO ANSWERS, MARK S. REESE
- 05/12/2015 RULE 405 RETURN OF SERVICE, FILED, CERTIFICATE OF SERVICE OF THE SAME.

July 30, 2015



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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN  
JUDGMENT RENDERED IN THE CASE OF  
NORTHWEST BANK f/k/a NORTHWEST  
SAVINGS BANK, a Pennsylvania Financial  
Institution,  
Plaintiff,  
v.  
COVER CROP SOLUTIONS, LLC,  
Defendant.

Case No.  
AFFIDAVIT OF JAMES RAY STREINZ  
IN CONNECTION WITH FILING OF  
FOREIGN JUDGMENT

I, James Ray Streinz, being first duly sworn, depose and say:

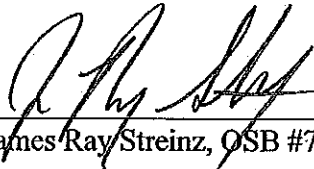
1. I am the lawyer for Northwest Bank f/k/a Northwest Savings Bank ("Northwest"). I am submitting this affidavit pursuant to ORS 24.125, in connection with the filing of a foreign judgment in favor of Northwest.

2. The name of the judgment creditor is Northwest Bank f/k/a Northwest Savings Bank. Its address is 1700 Roosevelt Avenue, York, PA 17408.

3. The name of the judgment debtor is Cover Crop Solutions LLC. Its last-known postal address is 201 East Oregon Road, Lititz, PA 17543.

4. This judgment is not being filed in any other court in Oregon.

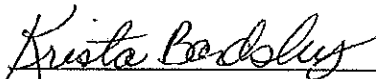
1           5.       Costs in the amount of \$346.00 have been incurred in transcribing the judgment  
2 and should be included with the filing of foreign judgment as amounts due and owing per ORS  
3 24.140.  
4

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James Ray Streinz, OSB #794107

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8           SUBSCRIBED AND SWORN TO before me on August 5, 2015.



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Notary Public for Oregon  
My commission expires: September 23, 2015

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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN  
JUDGMENT RENDERED IN THE CASE OF  
NORTHWEST BANK f/k/a NORTHWEST  
SAVINGS BANK, a Pennsylvania Financial  
Institution,  
Plaintiffs,  
v.  
COVER CROP SOLUTIONS, LLC,  
Defendant.

Case No.  
STATEMENT OF MONEY JUDGMENT  
AND MONEY AWARD  
(ORS 24.125; ORS 18.042)

MONEY AWARD

JUDGMENT CREDITOR: NORTHWEST BANK f/k/a  
NORTHWEST SAVINGS BANK  
1700 Roosevelt Avenue  
York, PA 17408.  
ATTORNEY FOR JUDGMENT CREDITOR: James Ray Streinz, OSB#794107  
McEwen Gisvold, LLP  
1100 SW Sixth Avenue, Suite 1600  
Portland, OR 97204  
(503) 226-7321.  
JUDGMENT DEBTOR: COVER CROP SOLUTIONS, LLC

ADDITIONAL DEBTOR INFORMATION (if known)

C/O D. Eric Weaver, Manager C/O Registered Agent  
201 East Oregon Road 679 Hilldale Road  
Lititz, PA 17543 Holtwood, PA 17532

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DATE OF BIRTH: N/A  
SOCIAL SECURITY NO./TAX ID NO.: 27-2252441  
DRIVER'S LICENSES NO. AND STATE OF ISSUANCE: N/A

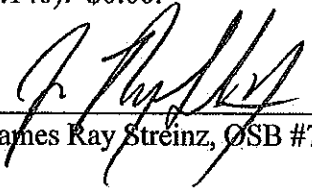
ATTORNEY FOR JUDGMENT DEBTOR: None

NAME OF ANY PERSON OR PUBLIC BODY KNOWN TO JUDGMENT CREDITOR  
OTHER THAN JUDGMENT CREDITOR'S ATTORNEY WHO IS ENTITLED TO ANY  
PORTION OF A PAYMENT MADE ON THE JUDGMENT: None

AMOUNT OF JUDGMENT AWARD: \$7,077,631.54 principal, including pre-judgment  
interest of \$95,534.38 and costs and attorney fees of \$62,409.81.

POST-JUDGMENT INTEREST ACCRUAL INFORMATION: Simple interest on  
\$7,235,575.73 at the rate of 7.25 percent per annum from the date of entry of judgment (April  
23, 2015) until paid.

AMOUNT OF POST-JUDGMENT COSTS (ORS 24.140): \$0.00.

  
James Ray Streinz, OSB #794107

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

850 Main St Dallas Oregon 97338

<http://courts.oregon.gov/polk>

August 05, 2015

JAMES RAY STREINZ  
No Known Address

Re: Northwest Bank vs Cover Crop Solutions LLC  
Case #: 15CV20664 Case Type: Contract

**NOTICE OF ENTRY OF JUDGMENT**

The court entered a Judgment - General Creates Lien on 08/05/2015 in the court register.

This judgment contains a money award that has been noted in the court register.

This judgment creates a judgment lien. A judgment lien attaches a debt for the payment of money to the real property of the judgment debtor, who is identified in the judgment document.

Judgment Creditor: Northwest Bank  
Judgment Debtor: Cover Crop Solutions LLC

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**Why did I get this notice?**

Oregon law (ORS 18.078) requires the court to send this notice when a judgment is entered. If you have questions about the judgment, contact the other party.

**If this Notice says that a judgment lien was created:**

**What is a lien?**

A lien is a claim attached to the real property of the person who owes a debt. Depending on the type of case and the amount of the money award, some judgments automatically attach a lien to real property. A lien may prevent property from being sold, or it may require a buyer to pay off the judgment before the seller gets any money.

**How do I get rid of a lien?**

Judgment liens stay attached to real property until the judgment is paid off, including costs and fees. Once the judgment is paid, the creditor (the person receiving the payment) has to file a Satisfaction of Judgment, which tells the court that the judgment is paid.

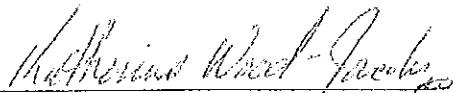
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Commonwealth of Pennsylvania, }  
County of Lancaster, } SS.:

I, Katherine Wood-Jacobs, Prothonotary of the Court of Common Pleas in and for said County, the same being a court of Law and of record, do hereby certify that the foregoing is a full, true and correct copy of the whole record of the case therein stated, wherein NORTHWEST BANK F/K/A NORTHWEST SAVINGS BANK, plaintiff(s) vs. COVER CROP SOLUTIONS, LLC defendant(s), as the same remains of Record before the said Court at No. CI-15-03747 of CONFESSION OF JUDGMENT Term A.D. 2015

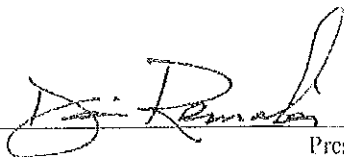
In Testimony Whereof, I have hereunto set my hand and affixed the seal of said Court this 30<sup>th</sup> day of JULY A.D. 2015

  
Prothonotary

Certified amount of the judgment is \$7,235,575.73 PLUS INTEREST.

---

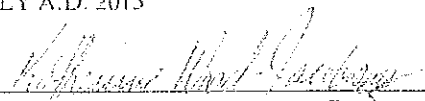
I, Dennis E. Reinaker President Judge of Second Judicial District, composed of the County of Lancaster, do certify that Katherine Wood-Jacobs by whom the annexed record, certificate and attestation were made and given, and who in his own proper handwriting thereunto subscribed his name and affixed the seal of the Court of Common Pleas of said County, was at the time of so doing and now is Prothonotary in and for said County of Lancaster, in the Commonwealth of Pennsylvania, duly commissioned and qualified, to all of whose acts as such full faith and credit are and ought to be given as well as in courts of judicature as elsewhere, and that the said record, certificate and attestation are in due form of law, and made by the proper officer.

  
President Judge.

Commonwealth of Pennsylvania, }  
County of Lancaster, } SS.:

I, Katherine Wood-Jacobs Prothonotary of the Court of Common Pleas in and for the said County, do certify that the Honorable Dennis E. Reinaker by whom the forgoing attestation was made, and who has been thereunto subscribed his name, was at the time of making thereof and still is President Judge of the Court of Common Pleas in and for said County, duly commissioned and qualified; to all whose acts as such full faith and credit are and ought to be given, as well as in courts of judicature as elsewhere.

In Testimony Whereof I have hereunto set my hand and affixed the seal of said Court, this 24<sup>th</sup> day of JULY A.D. 2015

  
\_\_\_\_\_  
Prothonotary

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## Exemplified Record

FROM LANCASTER COUNTY

2015 Term, No. CI-15-03747

NORTHWEST BANK, Plaintiff  
1700 ROOSEVELT AVE  
YORK, PA 17408  
F/K/A NORTHWEST SAVINGS BANK  
1700 ROOSEVELT AVE  
YORK, PA 17408

vs.

COVER CROP SOLUTIONS, LLC, Defendant  
201 E OREGON RD  
LITITZ, PA 17543

Debt, \$7,235,575.73 PLUS INTEREST  
Entered and Filed 04/24/2015  
Katherine Wood-Jacobs, Prothonotary

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# PROTHONOTARY OF LANCASTER COUNTY

Katherine Wood-Jacobs  
Prothonotary

George Alspach  
Solicitor



NORTHWEST BANK (et al.)  
vs.  
COVER CROP SOLUTIONS LLC

Case Number  
CI-15-03747

## PROTHONOTARY DOCKET ENTRIES

- 04/24/2015 CONFESSION OF JUDGMENT FILED  
PURSUANT TO THE AUTHORITY CONTAINED IN THE WARRANT OF ATTORNEY, I APPEAR FOR  
DEFENDANT AND CONFESS JUDGMENT AGAINST DEFENDANT IN THE AMOUNT OF \$7,235,575.73  
PLUS INTEREST, WITH PRAECIPE FOR ASSESSMENT OF DAMAGES. PURSUANT TO PA.R.C.P.  
2950 ET SEQ. PLEASE ASSESS DAMAGES AND ENTER JUDGMENT AGAINST DEFENDANT IN THE  
AMOUNT OF \$7,235,575.73 PLUS INTEREST. FILED BY LOUISE MELCHOR, ESQ. JUDGMENT  
ENTERED AS DIRECTED BY KATHERINE WOOD-JACOBS, PROTHONOTARY.
- 04/24/2015 COMPLAINT IN CONF. JUDGMENT  
FILED BY LOUISE MELCHOR, ESQ. CERTIFICATION OF ADDRESSES, AFFIDAVIT OF VICE  
PRESIDENT OF SPECIAL ASSETS AT NORTHWEST BANK, DEAN HUYA, AFFIDAVIT OF NON  
CONSUMER CREDIT AND NON RESIDENTIAL LEASE BY DEAN HUYA. AFFIDAVIT OF NON  
MILITARY SERVICE, AFFIDAVIT OF BUSINESS TRANSACTION AND NOTICE UNDER RULE 2958.1  
OF JUDGMENT AND EXECUTION.
- 236 NOTICE TO DEFENDANT AND COPY OF SAME W/RECEIPT BACK TO ATTORNEY ON APRIL 28,  
2015.  
(COPY W/CHECK TO SHERIFF ON APRIL 28, 2015.)
- 04/24/2015 PRAECIPE ENTER APPEARANCE  
FOR THE PLAINTIFF. FILED BY LOUISE MELCHOR, ESQ.
- 04/24/2015 CAPTION ENTRY IS:  
NORTHWEST BANK F/K/A NORTHWEST SAVINGS BANK VS COVER CROP SOLUTIONS, LLC
- 04/30/2015 04/29/2015 12:00AM SERVICE WITHDRAWN ON 4/29/15 BY FAXED LETTER FROM ATTORNEY  
LOUISE MELCOR AND RETURNED BY THE SHERIFF'S OFFICE. DEFENDANT'S COUNSEL WILL  
ACCEPT SERVICE ON HIS CLIENT'S BEHALF. COPY OF LETTER REQUESTING CANCELLATION  
OF SERVICE ATTACHED. SHERIFF COSTS: \$28.00 SO ANSWERS, MARK S. REESE
- 05/12/2015 RULE 405 RETURN OF SERVICE, FILED, CERTIFICATE OF SERVICE OF THE SAME.

July 30, 2015

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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN  
JUDGMENT RENDERED IN THE CASE OF

Case No.

NORTHWEST BANK f/k/a NORTHWEST  
SAVINGS BANK, a Pennsylvania Financial  
Institution.

AFFIDAVIT OF JAMES RAY STREINZ  
IN CONNECTION WITH FILING OF  
FOREIGN JUDGMENT

Plaintiff,

v.

COVER CROP SOLUTIONS, LLC,

Defendant.

I, James Ray Streinz, being first duly sworn, depose and say:

1. I am the lawyer for Northwest Bank f/k/a Northwest Savings Bank ("Northwest"). I am submitting this affidavit pursuant to ORS 24.125, in connection with the filing of a foreign judgment in favor of Northwest.

2. The name of the judgment creditor is Northwest Bank f/k/a Northwest Savings Bank. Its address is 1700 Roosevelt Avenue, York, PA 17408.

3. The name of the judgment debtor is Cover Crop Solutions LLC. Its last-known postal address is 201 East Oregon Road, Lititz, PA 17543.

4. This judgment is not being filed in any other court in Oregon.



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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF POLK

IN THE MATTER OF A FOREIGN  
JUDGMENT RENDERED IN THE CASE OF

Case No.

NORTHWEST BANK, f/k/a NORTHWEST  
SAVINGS BANK, a Pennsylvania Financial  
Institution.

STATEMENT OF MONEY JUDGMENT  
AND MONEY AWARD

Plaintiffs,

(ORS 24.125; ORS 18.042)

v.

COVER CROP SOLUTIONS, LLC.

Defendant.

MONEY AWARD

JUDGMENT CREDITOR:

NORTHWEST BANK f/k/a  
NORTHWEST SAVINGS BANK  
1700 Roosevelt Avenue  
York, PA 17408.

ATTORNEY FOR JUDGMENT CREDITOR:

James Ray Streinz, OSB#794107  
McEwen Gisvold, LLP  
1100 SW Sixth Avenue, Suite 1600  
Portland, OR 97204  
(503) 226-7321.

JUDGMENT DEBTOR:

COVER CROP SOLUTIONS, LLC

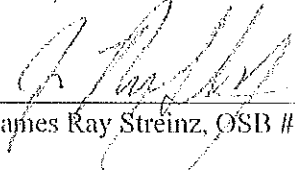
ADDITIONAL DEBTOR INFORMATION (if known)

C/O D. Eric Weaver, Manager  
201 East Oregon Road  
Lititz, PA 17543

C/O Registered Agent  
679 Hilldale Road  
Holtwood, PA 17532

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DATE OF BIRTH: N/A  
SOCIAL SECURITY NO./TAX ID NO.: 27-2252441  
DRIVER'S LICENSES NO. AND STATE OF ISSUANCE: N/A  
ATTORNEY FOR JUDGMENT DEBTOR: None  
NAME OF ANY PERSON OR PUBLIC BODY KNOWN TO JUDGMENT CREDITOR  
OTHER THAN JUDGMENT CREDITOR'S ATTORNEY WHO IS ENTITLED TO ANY  
PORTION OF A PAYMENT MADE ON THE JUDGMENT: None  
AMOUNT OF JUDGMENT AWARD: \$7,077,631.54 principal, including pre-judgment  
interest of \$95,534.38 and costs and attorney fees of \$62,409.81.  
POST-JUDGMENT INTEREST ACCRUAL INFORMATION: Simple interest on  
\$7,235,575.73 at the rate of 7.25 percent per annum from the date of entry of judgment (April  
23, 2015) until paid.  
AMOUNT OF POST-JUDGMENT COSTS (ORS 24.140): \$0.00.

  
James Ray Streinz, OSB #794107