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2024 SEP 19 04:14 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 24-2-08809-1 SEA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING

WELLS FARGO BANK, NATIONAL  
ASSOCIATION, a national banking  
association, in its capacity as Agent,

Petitioner,

vs.

NORTHWEST FISH COMPANY, LLC, a  
Washington corporation; PETER PAN  
SEAFOOD COMPANY, LLC, an Alaska  
limited liability company, ALASKA FISH  
HOLDINGS, LLC, a Delaware limited  
liability company, and RAYMOND  
MACHINE SHOP, LLC, a Washington  
limited liability company,

Respondents.

No. 24-2-08809-1 SEA

NOTICE OF CONCLUSION OF  
AUCTION AND DETERMINATION  
OF PREVAILING BID AND BACK-  
UP BID

Pursuant to the Order (1) Approving Bid and Auction Procedures; (2) Scheduling Hearing to Approve Sale of Assets; and (3) Approving Assumption and Assignment of Executory Contracts (“Bid Procedures Order”), Peter Pan Seafoods, LLC (“Peter Pan”), by and through the Stapleton Group, Inc. (“Receiver”), hereby provides notice that it has concluded the auction contemplated by the Bid Procedures Order and has determined that the

NOTICE OF CONCLUSION OF AUCTION AND  
DETERMINATION OF PREVAILING BID AND  
BACK-UP BID - 1

SCHWABE, WILLIAMSON & WYATT, P.C.  
Attorneys at Law  
1420 5th Avenue, Suite 3400  
Seattle, WA 98101  
Telephone 206-622-1711

1 bid in the amount of \$37,324,000.00 submitted by Rodger May (the “Prevailing Bidder”)  
2 constitutes the Prevailing Bid,<sup>1</sup> and that the bid in the amount of \$37,067,320.00 submitted by  
3 Silver Bay Seafoods, L.L.C. (the “Back-Up Bidder”) constitutes the Back-Up Bid.

4 Attached hereto as Exhibit A is a true copy of the asset purchase agreement conforming  
5 to the Prevailing Bid. Attached hereto as Exhibit B is a true copy of the bid confirmation sheet,  
6 asset purchase agreement, and schedules submitted by Silver Bay Seafoods, L.L.C.

7 Dated this 19th day of September, 2024.

8 SCHWABE, WILLIAMSON & WYATT, P.C.

9  
10 By: s/ Lawrence R. Ream ,  
11 Lawrence R. Ream, WSBA #18159  
12 Email: lream@schwabe.com  
13 Davis Leigh, WSBA #58825  
14 Email: dbleigh@schwabe.com  
15 1420 5th Avenue, Suite 3400  
16 Seattle, WA 98101

17 *Attorneys for General Receiver,*  
18 *Stapleton Group, Inc.*

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25 <sup>1</sup> Capitalized terms not defined herein have the meanings assigned to them in the Bid  
26 Procedures Order.