

1 Bradley G. Sims
2 Email: trustee@trusteesims.com
3 1344 Disc Dr #1138
4 Sparks, NV 89436
5 Phone: (775) 364-5505

6 *Chapter 7 Trustee*

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF NEVADA**

10 In re:
11 **CARTWHEEL ROBOTICS INC.,**
12 Debtor(s).

13 Case No. 26-50278-HLB
14 Chapter 7

15 **EX PARTE APPLICATION FOR ORDER**
16 **SHORTENING TIME ON MOTION FOR**
17 **TURNOVER OF BANKRUPTCY ESTATE**
18 **PROPERTY PURSUANT TO 11 U.S.C. §**
19 **542(e)**

20 Judge: Honorable Hilary L. Barnes¹

21
22 Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-
23 captioned bankruptcy case hereby submits this *Ex Parte Application for Order Shortening Time*
24 *On Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* (the
25 “Application for OST”).

26 This Application for OST is made and based upon FRBP 9006 and Local Rule 9006, the
27 following memorandum of points and authorities, the *Declaration of Bradley G. Sims In Support*
28 *of the Ex Parte Application for Order Shortening Time On Motion for Turnover of Bankruptcy*
Estate Property Pursuant to 11 U.S.C. § 542(e) the “Sims Declaration”, and the Attorney
Information Sheet, all of which are filed separately and concurrently with this Court pursuant to
Local Rule 9014(c)(2).

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

1 WHEREFORE, the Trustee respectfully requests that this Honorable Court grant this
2 Application and issue an order shortening time to hear the *Motion for Turnover of Bankruptcy*
3 *Estate Property Pursuant to 11 U.S.C. § 542(e)* (the “Motion”) and for such other relief as is just
4 and proper.²

5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 **I. STATEMENT OF FACTS**

7 In the interests of brevity, the Trustee expressly incorporates the factual background set
8 forth in the Application and the declarations in support of the same.³

9 **II. LEGAL ARGUMENT**

10 Section 105 allows this Court to issue such orders as are necessary to carry out the
11 provisions of this title. FRBP 9006(c)(1) generally permits a Bankruptcy Court, for cause shown
12 and, in its discretion, to reduce the period during which any notice is given in accordance with the
13 Bankruptcy Rules. FRBP 9006(c)(1) provides as follows:

14 Except as provided in paragraph (2) of this subdivision, when an act
15 is required or allowed to be done at or within a specified time by
16 these rules or by a notice given thereunder or by order of court, the
court for cause shown may in its discretion with or without
Application or notice order the period reduced.

17 FED. R. BANKR. P. 9006(c)(1).

18 Local Rule 9006 provides further authority for shortening the time for a hearing. Under
19 Local Rule 9006(b), every Application for an order shortening time must be accompanied by an
20 affidavit stating the reasons for a shortened deadline.

21 Here, there is cause to allow the Motion to be heard on shortened time because the Trustee
22 has been recently appointed and has not been provided with any meaningful financial information
23 or records of the Debtor. Without access to the Debtor’s books and records, the Trustee cannot
24

25 ² The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-
26 captioned bankruptcy case pursuant Rule of Evidence 201, incorporated by reference by Federal
27 Rule of Bankruptcy Procedure 9017.

28 ³ Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to
them in the Application.

1 identify estate assets, evaluate liabilities, or otherwise carry out his statutory duties under 11
2 U.S.C. § 704.

3 The requested Information is fundamental to the administration of the estate, and delay in
4 obtaining such Information will materially hinder the Trustee's ability to promptly secure and
5 administer estate assets. Accordingly, good cause exists to shorten time for hearing on the
6 Motion.

7 **III. CONCLUSION**

8 For the foregoing reasons, the Trustee respectfully requests that this Court issue an order
9 shortening time to hear the Application and for such other relief as is just and proper.

10 Dated this 17th day of April, 2026.

11
12 By: /s/ Bradley G. Sims
13 Bradley G. Sims, Esq.
14 1344 Disc Dr #1138
15 Sparks, NV 89436
16 Phone: (775) 364-5505

17
18
19
20
21
22
23
24
25
26
27
28
Chapter 7 Trustee