

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

4 *Chapter 7 Trustee*

5
6 **UNITED STATES BANKRUPTCY COURT**
7 **DISTRICT OF NEVADA**

8 In re:
9 **CARTWHEEL ROBOTICS INC.,**
10 Debtor(s).

Case No. 26-50278-HLB
Chapter 7

**MOTION FOR TURNOVER OF
BANKRUPTCY ESTATE PROPERTY
PURSUANT TO 11 U.S.C. § 542(a)**

Date of Hearing: OST Requested
Time of Hearing: OST Requested

Place: Telephonic Hearing
Phone Conference Number: (833) 435-1820
Meeting ID: 160 532 0260
Access Code: 643758#

Judge: Honorable Hilary L. Barnes¹

17 Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-
18 captioned bankruptcy case hereby submits this *Motion for Turnover of Bankruptcy Estate*
19 *Property Pursuant to 11 U.S.C. § 542(a)* (the “Motion”).

20 The Motion is based on the following Memorandum of Points and Authorities and the
21 *Declaration of Bradley G. Sims in Support of the Motion for Turnover of Bankruptcy Estate*
22 *Property Pursuant to 11 U.S.C. § 542(a)* (the “Trustee Declaration”), which is filed separately
23 and concurrently with this Court pursuant to Local Rule 9014(c)(2). The Motion is also based on
24

25 _____
26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
28 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 the pleadings and papers on file herein, and any argument that may be entertained at the hearing
2 on the Motion.²

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I. INTRODUCTION**

5 This Motion seeks entry of an order pursuant to 11 U.S.C. § 542(a) compelling Scott
6 LaValley, (the “Respondent”), as president of the Debtor, to turn over all property of the Debtor
7 in his possession, including but not limited to tangible assets, vehicles, hardware, software,
8 intellectual property, source code, repositories, robotics systems, prototypes, models, YOGI,
9 Speedy, and all associated hardware, firmware, design files, engineering documentation, and
10 component parts related thereto (the “Property”). The Trustee requires possession and control of
11 the Property to perform his duties under 11 U.S.C. § 704, including identifying, securing, and
12 liquidating estate assets, and the Bankruptcy Code requires turnover of such Property to the
13 Trustee.

14 **II. JURISDICTION AND VENUE**

15 The Court has jurisdiction over the bankruptcy case and the subject matter of this Motion
16 pursuant to 28 U.S.C. §§ 157 and 1334. The Motion is a core proceeding under 28 U.S.C. §
17 157(b)(2). Pursuant to Local Rule 9014.2, if the Court determines that absent consent of the
18 parties the Court cannot enter final orders or judgment regarding the Motion consistent with
19 Article III of the United States Constitution, the Trustee consents to entry of final orders and
20 judgment by this Court. Venue before this Court is appropriate under 28 U.S.C. §§ 1408 and
21 1409. The statutory predicate for the relief requested in the Motion is 11 U.S.C. § 542(a).

22 **III. STATEMENT OF FACTS**

23 1. On March 19, 2026 an involuntary Chapter 7 petition was filed against Cartwheel
24 Robotics, Inc. (the “Debtor”). [ECF No. 1].

25 2. On April 14, 2026, this Court entered an Order for Relief. [ECF No. 7].

26
27 ² The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-
28 referenced bankruptcy case, including adversary proceedings, pursuant to Federal Rule of
Evidence 201, incorporated by reference by FRBP 9017.

1 3. The Trustee was thereafter appointed as the Chapter 7 Trustee pursuant to 11
2 U.S.C. § 701.

3 4. Respondent is the Debtor's president and, upon information and belief, has
4 possession, custody, and/or control of the Property, which is property of the bankruptcy estate.

5 5. The Trustee requires possession and control of the Property to perform his duties
6 under 11 U.S.C. § 704, including identifying, securing, and liquidating estate assets.

7 6. Respondent's continued possession and control of estate property is impairing the
8 Trustee's ability to administer the estate.

9 7. The Trustee now seeks turnover of the Property from the Respondent.

10 **IV. LEGAL ARGUMENT**

11 11 U.S.C. § 542(a) states:

12 Except as provided in subsection (c) or (d) of this section, an
13 entity, other than a custodian, in possession, custody, or control,
14 during the case, of property that the trustee may use, sell, or lease
15 under section 363 of this title, or that the debtor may exempt
16 under section 522 of this title, shall deliver to the trustee, and
account for, such property or the value of such property, unless
such property is of inconsequential value or benefit to the estate.

17 Section 542(a) provides that an entity in possession, custody, or control of property of the
18 estate shall deliver such property to the trustee. Upon entry of the Order for Relief, all property of
19 the Debtor became property of the estate pursuant to 11 U.S.C. § 541. As president of the Debtor,
20 Respondent is an insider and agent of the Debtor who holds estate property in a representative
21 capacity. The Property described herein constitutes property of the estate and is subject to
22 turnover under § 542(a). Respondent's continued possession and control of estate property is
23 impairing the Trustee's ability to administer the estate. The Trustee is entitled to immediate
24 possession and control of estate property in order to perform his duties under 11 U.S.C. § 704.
25 This Motion seeks to enforce the Trustee's right to possession and control of estate property held
26 by the Debtor's president in a representative capacity and does not seek to adjudicate any bona
27 fide dispute regarding ownership of such property. To the extent Respondent asserts that any
28 property is not property of the estate or is held in an individual capacity, Respondent should be

1 required to identify such property and the basis for such claim. The Trustee therefore requests an
2 order requiring that within seven (7) days of the entry of such order granting the Motion, the
3 Respondent turn over the Property to the Trustee.

4 **V. CONCLUSION**

5 For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:
6 (i) turn over all Property to the Trustee; (ii) provide all access credentials, passwords, and
7 administrative rights necessary to access and control such Property; (iii) identify any property in
8 his possession that he contends is not property of the estate and the basis for such contention; and
9 (iv) for such other and further relief as is just and proper.

10 Dated this 17th day of April, 2026.

11 By: /s/ Bradley G. Sims

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

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