

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

**DECLARATION OF BRADLEY G. SIMS
IN SUPPORT OF 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

18 I, Bradley G. Sims, declare as follows:

19 1. I am over the age of 18 years and I am competent to make this declaration. I have
20 personal knowledge of the facts set forth herein, except for those facts stated on information and
21 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I
22 could and would testify as to the matters set forth below based upon my personal knowledge.

23 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.
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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 3. I make this declaration in support of the *Motion for Turnover of Bankruptcy Estate*
2 *Property Pursuant to 11 U.S.C. § 542(a)* (the “Motion”).²

3 4. On March 19, 2026 an involuntary Chapter 7 petition was filed against Cartwheel
4 Robotics, Inc. (the “Debtor”). [ECF No. 1].³

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

6 6. I was thereafter appointed as the Chapter 7 Trustee pursuant to 11 U.S.C. § 701.

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

9 8. As trustee, I require possession and control of the Property to perform my duties
10 under 11 U.S.C. § 704, including identifying, securing, and liquidating estate assets.

11 9. Respondent’s continued possession and control of estate property is impairing my
12 ability to administer the estate.

13 10. I therefore seek turnover of the Property from the Respondent.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and correct.

16 Dated this 17th day of April, 2026.

17
18 /s/Bradley G. Sims

19 Bradley G. Sims, Chapter 7 Trustee
20
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22
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24 _____
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26 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
27 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
28 Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise expressly stated herein,
all undefined, capitalized terms shall have the meaning ascribed to them in the Motion.

³ All references to “ECF No.” are to the numbers assigned to the documents filed in the case as
they appear on the docket maintained by the clerk of the court.