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6 *Chapter 7 Trustee*

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

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

Case No. 26-50278-HLB  
Chapter 7

**EX PARTE APPLICATION FOR ORDER  
SHORTENING TIME ON MOTION FOR  
TURNOVER OF BANKRUPTCY ESTATE  
PROPERTY PURSUANT TO 11 U.S.C. §  
542(a)**

Judge: Honorable Hilary L. Barnes<sup>1</sup>

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

18 This Application for OST is made and based upon FRBP 9006 and Local Rule 9006, the  
19 following memorandum of points and authorities, the *Declaration of Bradley G. Sims In Support*  
20 *of the Ex Parte Application for Order Shortening Time On Motion for Turnover of Bankruptcy*  
21 *Estate Property Pursuant to 11 U.S.C. § 542(a)* the “Sims Declaration”, and the Attorney  
22 Information Sheet, all of which are filed separately and concurrently with this Court pursuant to  
23 Local Rule 9014(c)(2).  
24  
25

26 <sup>1</sup> 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 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(a)* (the “Motion”) and for such other relief as is just  
4 and proper.<sup>2</sup>

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.<sup>3</sup>

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 Application to be heard on shortened time Here, there is  
22 cause to allow the Application to be heard on shortened time because the Trustee has been  
23 recently appointed and has not been provided with possession or control of the Debtor’s assets or  
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26 <sup>2</sup> The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-  
27 captioned bankruptcy case pursuant Rule of Evidence 201, incorporated by reference by Federal  
Rule of Bankruptcy Procedure 9017.

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

1 any meaningful information regarding the same. Respondent, as president of the Debtor, is  
2 believed to be in possession, custody, or control of estate property, and has not turned over such  
3 property to the Trustee.

4 Without access to the Property, the Trustee cannot identify, secure, or administer estate  
5 assets, evaluate the Debtor's financial condition, or carry out his duties under 11 U.S.C. § 704.  
6 The requested relief is necessary to allow the Trustee to obtain immediate control over estate  
7 property and begin administration of the case. Delay in obtaining such relief will materially  
8 prejudice the estate and its creditors. Accordingly, good cause exists to shorten time for hearing  
9 on the Motion.

10 **III. CONCLUSION**

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

13 Dated this 17<sup>th</sup> day of April, 2026.

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20 *Chapter 7 Trustee*  
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