

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

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

Case No. 26-50278-HLB
Chapter 7

NOTICE OF HEARING AND ORDER
SHORTENING TIME FOR HEARING ON
MOTION FOR TURNOVER
OF BANKRUPTCY ESTATE PROPERTY
PURSUANT TO 11 U.S.C. § 542(e)

Hearing Date: April 24, 2026
Hearing Time: 10:30 a.m.

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

Judge: Honorable Hilary L. Barnes ¹

19 The Court, having considered the *Ex Parte Application for Order Shortening Time On*
20 *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* (“OST
21 Motion”), filed by Trustee Bradley G. Sims (“Trustee”), seeking an order shortening time
22 for the hearing on his *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C.*
23 *§ 542(e)*; and having found cause is present to hear the Motion on shortened time:

24 **NOTICE IS HEREBY GIVEN** that the *Motion for Turnover of Bankruptcy Estate*
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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 *Property Pursuant to 11 U.S.C. § 542(e)* (the “Motion”) was filed by the Trustee in the above-
2 captioned bankruptcy case.

3 The Motion seeks an order compelling Scott LaValley, (the “Respondent”), as president of
4 the Debtor, to turn over all financial information of the Debtor, including electronically stored
5 information, cloud-based records, and data maintained on third-party platforms, in his possession
6 to the Trustee, including but not limited to, the Debtor’s bank statements, other financial
7 statements, general ledgers, balance sheets, records of accounts receivable, records of accounts
8 payable, accounting records, tax returns and filings, corporate governance documents, cap table
9 and investor records, all contracts, non-disclosure agreements, employment and contractor
10 agreements, intellectual property assignment agreements, payroll records, records of all transfers
11 of funds, including transfers during the period from the petition date through the Order for Relief,
12 documentation of any loans, liens, or encumbrances, records of any transfer of intellectual
13 property, and access credentials and information necessary to obtain such records from third
14 parties (the “Information”).

15 A copy of the Motion, and the *Declaration of Bradley G. Sims in Support of Motion for*
16 *Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* are on file with the
17 Clerk’s Office of the United States Bankruptcy Court, 300 Booth Street, Reno, Nevada 89509.
18 Copies of the Motion and any supporting declarations may also be obtained from counsel for the
19 Trustee or through the Bankruptcy Court’s website at www.nvb.uscourts.gov.

20 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
21 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
22 must file an opposition with the Court, and serve a copy of the person making the Motion ***no later***
23 ***than April 22, 2026***. The opposition must state your position, set forth all relevant facts and legal
24 authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

25 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
26 with the court. You *must* also serve your written response on the person who sent you this
27 notice.

28 If you do not file a written response with the court, or if you do not serve your written

1 response on the person who sent you this notice, then:

- 2 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 3 • The Court may *rule against you* without formally calling the matter at the hearing.

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5 **NOTICE IS FURTHER GIVEN** that absent further order of the Court, a hearing on said
6 Motion shall be heard by a United States Bankruptcy Judge on the 24th day of April, 2026 at
7 10:30 a.m. prevailing Pacific Time. Parties are permitted to appear telephonically by dialing (833)
8 435-1820 and entering Meeting ID (if applicable) 160 532 0260, and entering Participant Code:
9 643758#. Parties wishing to appear in person at the courthouse may do so. If you intend to
10 participate at this hearing please check the Court’s website prior to the hearing for any updated
11 instructions relating to whether the hearing is in person or conducted remotely including the
12 applicable Court participation number and access code. You may view the Court Calendar at:
13 <https://www.nvb.uscourts.gov/calendars/court-calendars/>. Select the hearing judge. Next click on
14 the “calendar date” to view the hearing judge’s dial-in number and meeting access codes.

15 **NOTICE IS FURTHER GIVEN** that this hearing may be continued from time to time
16 without further notice except for the announcement of any adjourned dates and times at the
17 above-noted hearing or any adjournment thereof.

18 Dated this 17th day of April, 2026.

19 By: /s/ Bradley G. Sims
20 Bradley G. Sims, Esq.
21 1344 Disc Dr #1138
22 Sparks, NV 89436
23 Phone: (775) 364-5505

24 *Chapter 7 Trustee*
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