

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re.

CARTWHEEL ROBOTICS INC ,
Debtor

Case No 26-50278-HLB
Chapter 7

SCOTT LAVALLEY,
Respondent

**RESPONSE AND LIMITED OPPOSITION OF SCOTT LAVALLEY TO TRUSTEE'S
MOTION FOR TURNOVER PURSUANT TO 11 U.S C § 542(a) AND (e)**

Scott LaValley ("Respondent"), appearing pro se, hereby responds to the Trustee's Motion for Turnover of Bankruptcy Estate Property (the "Motion") and states as follows

1 Limited Response

This Response is made on a limited basis to address the Motion Respondent does not oppose the Trustee's lawful efforts to obtain property of the estate or relevant information to the extent such materials exist and are within Respondent's possession, custody, or control

2 Lack of Possession, Custody, or Control

Respondent does not have possession, custody, or control of the property or information described in the Motion

To the best of Respondent's knowledge, the materials referenced in the Motion are not in Respondent's possession and may be maintained by third parties, may no longer be accessible, or may have been transferred prior to the Petition Date Respondent does not currently have access to company systems, accounts, or records

3 No Ability to Comply as Requested

Because Respondent does not possess or control the requested materials, Respondent is unable to comply with the turnover demands as framed in the Motion

4 No Present Ability to Provide Additional Information

Respondent does not currently have access to or possession of additional information responsive to the Motion

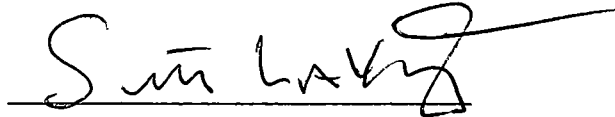
5 Reservation of Rights

Respondent expressly reserves all rights, including the right to supplement this Response if additional information becomes available

WHEREFORE, Respondent respectfully requests that the Court

- 1 Deny the Motion to the extent it seeks turnover of materials not in Respondent's possession, custody, or control, and
- 2 Grant such other and further relief as the Court deems just and proper

DATED this 20th day of April, 2026

A handwritten signature in black ink, appearing to read "Scott LaValley", written over a horizontal line. The signature is stylized and cursive.

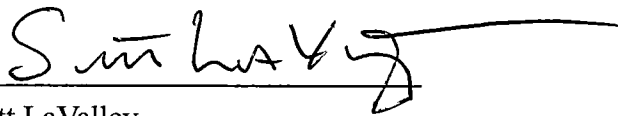
Scott LaValley
Respondent, Pro Se
5586 Rivers Edge Dr
Fallon, NV 89406
lavalley scott@gmail com

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April, 2026, I served a true and correct copy of the foregoing **Response and Limited Opposition** on the following party

Bradley G Sims, Chapter 7 Trustee
1344 Disc Dr #1138
Sparks, NV 89436
Email trustee@trusteesims.com

I declare under penalty of perjury that the foregoing is true and correct



Scott LaValley