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6 *Chapter 7 Trustee*

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

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

13 Case No. 26-50278-HLB  
14 Chapter 7

15 **OMNIBUS REPLY IN SUPPORT**  
16 **MOTION FOR TURNOVER OF**  
17 **BANKRUPTCY ESTATE PROPERTY**  
18 **PURSUANT TO 11 U.S.C. § 542(e) AND**  
19 **MOTION FOR TURNOVER OF**  
20 **BANKRUPTCY ESTATE PROPERTY**  
21 **PURSUANT TO 11 U.S.C. § 542(a)**

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

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

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

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

23 The Reply is based on the following Memorandum of Points and Authorities, the  
24 pleadings and papers on file herein, and any argument that may be entertained at the hearings on  
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 the *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* and the  
2 *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(a)* (collectively,  
3 the “Motions”).

## 4 **MEMORANDUM OF POINTS AND AUTHORITIES**

### 5 **I. INTRODUCTION**

6 The Motions request turnover of two discrete categories of items from the Respondent.  
7 First, the financial information of the Debtor in Respondent’s custody and control. Second, the  
8 assets of the Debtor in the Respondent’s possession. One business day after the filing of the  
9 Motions, the Respondent, in *pro per* filed a *RESPONSE AND LIMITED OPPOSITION OF*  
10 *SCOTT LAVALLEY TO TRUSTEE’S MOTION FOR TURNOVER PURSUANT TO 11 U.S.C. §*  
11 *542(a) AND (e)* (the “Response”). The Response appears to be directed at both Motions and the  
12 Trustee believes the Response should be treated as an omnibus response to both of the Motions.  
13 Importantly, the Response does not oppose the Trustee’s entitlement to turnover. Instead, the  
14 Respondent asserts that he does not currently have possession, custody, or control of the Debtor’s  
15 property or records. This admission underscores, not undermines, the need for immediate relief. If  
16 the Debtor’s president does not have possession or access to estate property, then it is imperative  
17 that the Trustee obtain prompt Court intervention to identify, locate, and secure such property for  
18 the benefit of the estate.

### 19 **II. LEGAL ARGUMENT**

#### 20 **A. Respondent’s Admissions Within the Response Support Immediate Relief.**

21 Within the Response, the Respondent asserts:

- 22 • He does not oppose turnover of estate property to the extent it exists and is within  
23 his control;
- 24 • He does not currently have possession, custody, or control of the Debtor’s property  
25 or records;
- 26 • Such property may be held by third parties or may have been transferred prior to  
27 the petition date;
- 28 • He does not have access to the Debtor’s systems, accounts, or records.

1  
2 The statements within the Response are troubling, because they establish that the Property  
3 in question existed, but assert that the Debtor’s president does not have custody or control of such  
4 property. Notably, Respondent does not assert that he lacks knowledge of the location or  
5 disposition of the Property, only that he does not presently have possession or control.

6 Section 542(a) requires an entity in possession, custody, or control of estate property to  
7 “deliver to the trustee, and account for, such property[.]” Even where a respondent claims not to  
8 have current possession of the property, this Court may still order turnover of such property as is  
9 in the Respondent's possession, identification of the location of estate property, disclosure of third  
10 parties who may have custody, possession or control of such property, and an accounting of  
11 transfers of such property. The Respondent’s assertion that he lacks possession is not a defense to  
12 turnover obligations, it instead triggers a duty to provide information sufficient to enable the  
13 Trustee to recover estate assets. Without such information, the Trustee will be unable to identify  
14 or recover estate assets, and administration of the estate will be effectively stalled.

15 **III. CONCLUSION**

16 For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:  
17 (i) requiring the Respondent to turn over all Property in his possession, custody, or control to the  
18 Trustee; (ii) requiring Respondent to provide all access credentials, passwords, and administrative  
19 rights necessary to access and control estate property; (iii) requiring the Respondent to identify all  
20 persons or entities that have possession, custody, or control of estate property; (iv) requiring the  
21 Respondent to identify all transfers of estate property, including the date, nature, consideration  
22 received, and recipient of such transfers; and (v) requiring the Respondent to provide a declaration  
23 under penalty of perjury confirming compliance with the Court’s order.

24 Dated this 20<sup>th</sup> day of April, 2026.

25 By: /s/ Bradley G. Sims

26 Bradley G. Sims, Esq.  
27 Chapter 7 Trustee  
28

**CERTIFICATE OF SERVICE**

I certify that on April 20, 2026, I served the foregoing document on the following parties in the following manner:

(CM/ECF ELECTRONIC SERVICE)

SALLIE B ARMSTRONG on behalf of Petitioning Creditor NEVADA BATTLE BORN GROWTH ESCALATOR, INC.

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SALLIE B ARMSTRONG on behalf of Petitioning Creditor RSF ROBOTICS I, A SERIES OF RSF MASTER LLC

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Dated this 20<sup>th</sup> day of April, 2026.

By: /s/ Bradley G. Sims

Bradley G. Sims, Esq.  
Chapter 7 Trustee