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6 *Chapter 7 Trustee*

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

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

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

16 **TRUSTEE’S OPPOSITION TO MOTION**
17 **TO CONTINUE HEARING ON**
18 **TRUSTEE’S MOTIONS FOR**
19 **TURNOVER**

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

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

26 Judge: Honorable Hilary L. Barnes¹

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28 Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case hereby submits this *Opposition to Motion to Continue Hearing on Trustee’s Motions for Turnover* (the “Opposition”).

The Opposition is based on the following Memorandum of Points and Authorities, the pleadings and papers on file herein, and any argument that may be entertained at the hearings on the *Motion to Continue Hearing on Trustee’s Motions for Turnover* (the “Motion”).²

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The 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”.

² As of writing, the Motion has not been set for hearing and it is unclear whether the Motion will be heard jointly with the motions requesting turnover.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

By way of the Motion, Scott LaValley (the “Respondent”) “requests that this Court continue the hearings on the *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* [ECF No. 13] and the *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(a)* [ECF No. 18] (collectively, the “Motions for Turnover”).

Respondent seeks a continuance based on an asserted lack of time to prepare. However, Respondent has already filed a substantive response to the Motions for Turnover and has clearly articulated his position. In his *RESPONSE AND LIMITED OPPOSITION OF SCOTT LAVALLEY TO TRUSTEE'S MOTION FOR TURNOVER PURSUANT TO 11 U.S.C. § 542(a) AND (e)* (the “Response”), Respondent does not oppose the Trustee’s entitlement to turnover but instead asserts that he does not have possession, custody, or control of the requested property or information. A continuance will not alter Respondent’s position and will only delay the Trustee’s ability to identify and secure estate assets. The Motion should therefore be denied.

II. LEGAL ARGUMENT

A. Respondent Has Already Presented His Position

Respondent asserts that he requires additional time to review the Motions for Turnover and prepare a response. However, Respondent has already filed a Response addressing the Motions. In that Response, Respondent indicated that he does not oppose turnover of estate property to the extent it exists and is within his control, asserts that he does not have possession, custody, or control of the Debtor’s property or records, and states that such materials may be held by third parties or may have been transferred prior to the petition date. These positions are clear and complete. Additional time will not meaningfully change the Respondent’s stated position.

Moreover, the Trustee has not received possession or control of the Debtor’s assets or meaningful information regarding the same. As a result, the Trustee is presently unable to identify estate assets, secure and preserve such assets, or perform his statutory duties under 11 U.S.C. § 704. Respondent’s Response further suggests that estate property may have been transferred or is

1 held by third parties. Under these circumstances, delay will materially prejudice the estate by
2 impeding the Trustee's ability to locate and recover estate assets.

3 The Motions for Turnover seek to enforce basic obligations under the Bankruptcy Code,
4 including turnover of estate property and provision of information necessary to locate and secure
5 such property. Respondent does not dispute these obligations. Instead, Respondent claims an
6 inability to comply due to lack of possession or access. This is not a basis for continuance. To the
7 contrary, it underscores the need for immediate Court intervention to require Respondent to
8 identify the location of estate property and cooperate in its recovery.

9 **III. CONCLUSION**

10 For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:
11 (i) denying the Motion and the requested continuance; and (ii) for such other and further relief as
12 is just and proper.

13 Dated this 20th day of April, 2026.

14 By: /s/ Bradley G. Sims

15 Bradley G. Sims, Esq.
16 Chapter 7 Trustee
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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)

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Dated this 20th day of April, 2026.

By: /s/ Bradley G. Sims

Bradley G. Sims, Esq.
Chapter 7 Trustee