

1 Bradley G. Sims  
Email: trustee@trusteesims.com  
2 1344 Disc Dr #1138  
Sparks, NV 89436  
3 Phone: (775) 364-5505

4 *Chapter 7 Trustee*

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

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

Case No. 26-50278-HLB  
Chapter 7

**MOTION FOR ORDER (I)**  
**DESIGNATING SCOTT LAVALLEY AS**  
**PERSON REQUIRED TO PERFORM**  
**THE DUTIES OF THE DEBTOR**  
**PURSUANT TO FRBP 9001(b)(5), AND**  
**(II) COMPELLING FILING OF**  
**SCHEDULES, STATEMENTS, AND**  
**APPEARANCE AT § 341 MEETING**

Date of Hearing: June 9, 2026  
Time of Hearing: 1:00 p.m.

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

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

19  
20 Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-  
21 captioned bankruptcy case, hereby submits this *Motion for an Order (i) Designating Scott*  
22 *LaValley as Person Required to Perform the Duties of the Debtor Pursuant to FRBP 9001(b)(5),*  
23 *and (ii) Compelling Filing of Schedules, Statements, and Appearance At § 341 Meeting* (the  
24 “Motion”).

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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 is based on the following Memorandum of Points and Authorities and the  
2 *Declaration of Bradley G. Sims in Support of the Motion for an Order (i) Designating Scott*  
3 *LaValley as Person Required to Perform the Duties of the Debtor Pursuant to FRBP 9001(b)(5),*  
4 *and (ii) Compelling Filing of Schedules, Statements, and Appearance at § 341 Meeting (the*  
5 *“Trustee Declaration”)*, which is filed separately and concurrently with this Court pursuant to  
6 Local Rule 9014(c)(2). The Motion is also based on the pleadings and papers on file herein, and  
7 any argument that may be entertained at the hearing on the Motion.<sup>2</sup>

## 8 **MEMORANDUM OF POINTS AND AUTHORITIES**

### 9 **I. INTRODUCTION**

10 This Motion seeks entry of an order pursuant to Federal Rule of Bankruptcy Procedure  
11 9001(b)(5) designating the Debtor’s president, Scott LaValley (the “Respondent”), as the person  
12 required to perform the duties of the Debtor pursuant to Federal Rule of Bankruptcy Procedure  
13 9001(b)(5), and compelling Respondent to (i) file the Debtor’s schedules and statements, (ii)  
14 provide required information to the Trustee, and (iii) appear and testify at the meeting of  
15 creditors. Despite the entry of the Order for Relief, the Debtor, a non-individual, has failed to file  
16 any schedules or statements. As a result, the Trustee is unable to identify assets, provide proper  
17 notice to creditors, or administer the estate. Court intervention is required to designate a  
18 responsible individual and compel compliance with the Bankruptcy Code. As president of the  
19 Debtor, the Respondent is the party best situated to perform these actions on behalf of the Debtor.

### 20 **II. JURISDICTION AND VENUE**

21 The Court has jurisdiction over the bankruptcy case and the subject matter of this Motion  
22 pursuant to 28 U.S.C. §§ 157 and 1334. The Motion is a core proceeding under 28 U.S.C. §  
23 157(b)(2). Pursuant to Local Rule 9014.2, if the Court determines that absent consent of the  
24 parties the Court cannot enter final orders or judgment regarding the Motion consistent with  
25 Article III of the United States Constitution, the Trustee consents to entry of final orders and

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27 <sup>2</sup> The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-  
28 referenced bankruptcy case, including adversary proceedings, pursuant to Federal Rule of  
Evidence 201, incorporated by reference by FRBP 9017.

1 judgment by this Court. Venue before this Court is appropriate under 28 U.S.C. §§ 1408 and  
2 1409. The statutory predicates for the relief requested in the Motion include 11 U.S.C. §§ 343 and  
3 521 and FRBP 9001(b)(5).

4 **III. STATEMENT OF FACTS**

5 1. On March 19, 2026 an involuntary Chapter 7 petition was filed against Cartwheel  
6 Robotics, Inc. (the “Debtor”). [ECF No. 1].

7 2. On April 14, 2026, this Court entered an Order for Relief. [ECF No. 7].

8 3. The Trustee was thereafter appointed as the Chapter 7 Trustee pursuant to 11  
9 U.S.C. § 701.

10 4. The Debtor is not a natural person and can therefore only act through agents.

11 5. The Respondent was the Debtor’s president and person in control as of the petition  
12 date and is the individual most knowledgeable regarding the Debtor’s financial affairs, assets, and  
13 records.

14 6. To date, the Debtor has failed to file schedules, statements, or other required  
15 documents.

16 7. Without the required statements and schedules, and without relevant testimony at a  
17 § 341 Meeting of Creditors, the Trustee will be unable to fully identify assets, evaluate potential  
18 causes of action, provide notice to creditors, or otherwise properly administer the bankruptcy  
19 estate.

20 8. The Trustee therefore seeks designation of Respondent as the person required to  
21 perform the Debtor’s duties and an order compelling compliance.

22 **IV. LEGAL ARGUMENT**

23 Under 11 U.S.C. § 521, a debtor must file schedules of assets and liabilities and a  
24 statement of financial affairs. Additionally, 11 U.S.C. § 343 requires the debtor to appear and  
25 submit to examination under oath at the meeting of creditors. Federal Rules of Bankruptcy  
26 Procedure 9001(b)(5) provides that when the debtor is not a natural person, the term “debtor”  
27 includes, if designated by the Court, any officer, director, or other person in control of the debtor.  
28

1 Here, the Debtor is not a natural person and designation of a responsible person under rule  
2 9001 is appropriate. To date, no statements or schedules have been filed. There is, as of writing,  
3 no proper mailing matrix for the Debtor. Respondent served as the Debtor's president and was the  
4 person in control as of the petition date. He is therefore the individual best positioned to provide  
5 the information necessary to fulfill the Debtor's obligations under the Bankruptcy Code.  
6 Designation of Respondent and entry of an order compelling compliance is therefore necessary  
7 and appropriate.

8 **V. CONCLUSION**

9 For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:  
10 (i) granting the Motion in its entirety; (ii) designating Respondent as the person required to  
11 perform the duties of the Debtor pursuant to FRBP 9001(b)(5); (iii) compelling Respondent to file  
12 complete schedules of assets and liabilities, a statement of financial affairs, and all required  
13 documents within fourteen (14) days of entry of the order; (iv) requiring Respondent to appear  
14 and testify at the meeting of creditors pursuant to 11 U.S.C. § 343 at a date set by the Trustee; and  
15 (v) for such other and further relief as is just and proper.

16 Dated this 28<sup>th</sup> day of April, 2026.

17 By: /s/ Bradley G. Sims

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

22 *Chapter 7 Trustee*  
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