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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 **DECLARATION OF BRADLEY G. SIMS**  
17 **IN SUPPORT OF MOTION FOR ORDER**  
18 **(I) DESIGNATING SCOTT LAVALLEY**  
19 **AS PERSON REQUIRED TO PERFORM**  
20 **THE DUTIES OF THE DEBTOR**  
21 **PURSUANT TO FRBP 9001(b)(5), AND**  
22 **(II) COMPELLING FILING OF**  
23 **SCHEDULES, STATEMENTS, AND**  
24 **APPEARANCE AT § 341 MEETING**

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

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

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

I, Bradley G. Sims, declare as follows:

1. I am over the age of 18 years and I am competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those facts stated on information and belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I could and would testify as to the matters set forth below based upon my personal knowledge.

2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

<sup>1</sup> 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”.

1           3.       I make this declaration in support of the *Motion for an Order (i) Designating Scott*  
2 *LaValley as Person Required to Perform the Duties of the Debtor Pursuant to FRBP 9001(b)(5),*  
3 *and (ii) Compelling Filing of Schedules, Statements, and Appearance At § 341 Meeting* (the  
4 *“Motion”*).<sup>2</sup>

5           4.       On March 19, 2026, an involuntary Chapter 7 petition was filed against Cartwheel  
6 Robotics, Inc. (the *“Debtor”*). [ECF No. 1].<sup>3</sup>

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

8           6.       I was thereafter appointed as the Chapter 7 Trustee pursuant to 11 U.S.C. § 701.

9           7.       The Debtor is not a natural person and can therefore only act through agents.

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

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

15          10.       Without the required schedules and statements, and without testimony at the § 341  
16 meeting of creditors, I am unable to identify assets, evaluate potential causes of action, provide  
17 notice to creditors, or otherwise administer the estate.

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24 <sup>2</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11  
25 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The  
26 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of  
27 Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise expressly stated herein,  
all undefined, capitalized terms shall have the meaning ascribed to them in the Motion.

28 <sup>3</sup> All references to “ECF No.” are to the numbers assigned to the documents filed in the case as  
they appear on the docket maintained by the clerk of the court.

1 11. I therefore seek designation of Respondent as the person required to perform the  
2 Debtor's duties and an order compelling compliance.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is  
4 true and correct.

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

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*/s/Bradley G. Sims*  
Bradley G. Sims, Chapter 7 Trustee

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