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Proposed Counsel for Bradley G. Sims, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:
CARTWHEEL ROBOTICS, INC.,

Debtor.

Case No. BK-S-26-50278-HLB
Chapter 7

**APPLICATION TO EMPLOY HOUMAND
LAW FIRM, LTD. AS GENERAL
BANKRUPTCY COUNSEL FOR BRADLEY
G. SIMS, CHAPTER 7 TRUSTEE,
PURSUANT TO 11 U.S.C. § 327(a) AND
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2014**

Date of Hearing: June 11, 2026
Time of Hearing: 11:00 a.m.

Place: Telephonic Hearing
Phone Conference Number: (833) 435-1820
Meeting ID: 161 214 7653
Access Code: 313068#

Judge: Honorable Hilary L. Barnes¹

Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, by and through his proposed counsel, Jacob L. Houmand, Esq. of the Houmand Law Firm, Ltd., hereby submits this *Application to Employ Houmand Law Firm, Ltd. As General Bankruptcy Counsel for Bradley G. Sims, Chapter 7 Trustee Pursuant to 11 U.S.C. §*

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”.

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1 327(a) and Federal Rule of Bankruptcy Procedure 2014 (the “Application”).

2 This Application is filed pursuant to 11 U.S.C. §§ 327 and Federal Rule of Bankruptcy
 3 Procedure 2014. The Application is based on the following Memorandum of Points and
 4 Authorities, the *Declaration of Jacob L. Houmand, Esq. In Support of Application to Employ*
 5 *Houmand Law Firm, Ltd. As General Bankruptcy Counsel for Bradley G. Sims, Chapter 7*
 6 *Trustee Pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014* (the
 7 “Houmand Declaration”), and the *Declaration of Bradley G. Sims In Support of the Application to*
 8 *Employ Houmand Law Firm, Ltd. As General Bankruptcy Counsel for Bradley G. Sims, Chapter*
 9 *7 Trustee Pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014* (the
 10 “Trustee Declaration”), both of which are filed separately and concurrently with this Court
 11 pursuant to Local Rule 9014(c)(2). The Application is also based on the pleadings and papers on
 12 file herein, and any argument that may be entertained at a hearing on the Application.²

13 MEMORANDUM OF POINTS AND AUTHORITIES

14 I. STATEMENT OF FACTS

15 1. On March 19, 2026, an involuntary bankruptcy petition was filed against
 16 Cartwheel Robotics, Inc. (the “Debtor”). The petitioning creditors were RSF Robotics I, a series
 17 of RSF Master, LLC, Wong Family Revocable Trust, and Nevada Battle Born Growth Escalator,
 18 Inc. (collectively, the “Petitioning Creditors”).

19 2. On April 14, 2026, the Court entered an *Order for Relief In Involuntary Case* [ECF
 20 No. 7].

21 3. On April 16, 2026, the Trustee was appointed as the Chapter 7 Trustee in the
 22 Debtor’s bankruptcy case.

23 4. On April 27, 2026, the Court entered an *Order Granting Motion for Turnover of*
 24 *Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* [ECF No. 36] and an *Order Granting*
 25 *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(a)* [ECF No. 37]
 26

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

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1 that required Scott LaValley (“Mr. LaValley”) to turnover documents related to the Debtor’s
2 assets and financial affairs.

3 5. The Debtor has failed to timely file its statement of assets and statement of
4 financial affairs.

5 6. The Trustee believes that the Debtor transferred significant assets to third parties
6 prior to the commencement of his bankruptcy case and requires the assistance of counsel to
7 determine if such transfers can be avoided and recovered for the benefit of the Debtor’s creditors.

8 7. Accordingly, the Trustee has determined that he will require assistance in
9 administering the Debtor’s bankruptcy case.

10 8. The Trustee now desires to employ the Houmand Law Firm, Ltd. (the “Firm”) as
11 general bankruptcy counsel in the Debtor’s bankruptcy case to assist him in administering the
12 case for the benefit of creditors.

13 **II. JURISDICTION AND VENUE**

14 9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1134.
15 This is a core proceeding pursuant to 28 U.S.C. § 157(b) (2) (A). The statutory basis for the relief
16 sought is Section 327 and FRBP 2014. Venue of Debtor’s Chapter 7 case in this District is proper
17 pursuant to 28 U.S.C. §§ 1408 and 1409.

18 10. Pursuant to Local Rule 9014.2, if the Court determines that absent consent of the
19 parties the Court cannot enter final orders or judgment regarding the Application consistent with
20 Article III of the United States Constitution, the Trustee consents to entry of final orders and
21 judgment by this Court.

22 **III. THE FIRM**

23 11. The Firm is well suited for the type of representation required by the Trustee. The
24 Firm specializes in insolvency and reorganization matters, particularly the representation of
25 Chapter 7 Trustees in bankruptcy cases. Attorneys associated with the Firm have represented
26 debtors, Chapter 7 Trustees, creditors, and other parties-in-interest, and is qualified to act as
27 attorneys for the Trustee. Accordingly, the Trustee has determined that the Firm has the resources
28 and experience necessary to represent him in this case.

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1 12. The attorneys of the Firm that will render services in relation to the above-
2 captioned bankruptcy case are familiar with the United States Bankruptcy Code, the Federal
3 Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Local Rules and
4 will comply with them, as well as the procedures set forth in the “Guide to Applications for
5 Professional Compensation,” promulgated by the Office of the United States Trustee (the “U.S.
6 Trustee”) with regard to compensation of professionals.

7 13. The attorneys employed by the Firm are duly admitted to practice before this
8 Court.

9 14. The Trustee desires to employ the Firm as his general counsel in this bankruptcy
10 case to render the following professional services:

- 11 (a) To investigate the financial affairs of the Debtor and
12 determine if there are any preferential transfers, fraudulent
13 conveyances, or turnover actions that may be filed on behalf
14 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
15 547, and 548.
- 16 (b) To prosecute any and all preferential transfers, fraudulent
17 conveyances, or turnover actions that may be filed on behalf
18 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
19 547, and 548.
- 20 (c) To advise the Trustee of his rights and obligations and
21 performance of her duties during the administration of this
22 bankruptcy case;
- 23 (d) To represent the Trustee in all proceedings before this Court
24 and any other court which assumes jurisdiction of a matter
25 related to or arising in this bankruptcy case;
- 26 (e) To assist the Trustee in the performance of his duties as set
27 forth in 11 U.S.C. § 704;
- 28 (f) To assist the Trustee in developing legal positions and
strategies with respect to all facets of these proceedings; and
- (g) To provide such other counsel and advice as the Trustee
may require in connection with this bankruptcy case.

 15. The Trustee has selected the Firm because its attorneys have experience in matters
of this character, are familiar with bankruptcy practice and are qualified to represent the Trustee

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1 in this case.

2 16. Following the Trustee’s request that the Firm represent him in this case as general
3 bankruptcy counsel, a conflicts check was undertaken, utilizing the Firm’s client list. Based upon
4 the conflicts check the Firm and its associates are “disinterested persons” as defined by 11 U.S.C.
5 § 101 and do not hold or represent any interest adverse to the bankruptcy estate.

6 17. The conclusion that the Firm is a “disinterested” person within the meaning of 11
7 U.S.C. § 101(14) for purposes of 11 U.S.C. § 327(a) is based upon the fact neither the Firm nor
8 any of its attorneys:

- 9 (a) Are or were a creditor, equity security holder, or insider of
10 the Debtor;
- 11 (b) Are or were, within two (2) years before the date of the
12 filing the bankruptcy petition, a director, officer or
13 employee of Debtor as specified in subparagraph (c) of
14 Section 101(14);
- 15 (c) Hold, or have ever held, an interest materially adverse to the
16 interest of the estate or of any class of creditors, equity
17 holders, or parties in interest, by reason of any direct or
18 indirect relationship to, or interest in, the Debtor or for any
19 other reason except as stated herein;
- 20 (d) Represent, or have ever represented, the Debtor, insiders of
21 the Debtor, creditors of the Debtor, any other party in
22 interest, or their respective attorneys and accountants except
23 as set forth herein; and
- 24 (e) Is a relative or employee of the U.S. Trustee or a
25 Bankruptcy Judge except as stated herein.

26 18. The Firm represents no interest that is adverse to the Trustee, to the Debtor’s
27 estate, any creditor, any party in interest, the U.S. Trustee, or any attorney or accountant
28 employed by the foregoing, in matters upon which it will be engaged as counsel.

19 Except as set forth herein, neither the Firm nor any of its attorneys has any
20 connection with the Debtor, the creditors, any other parties in interest, their respective attorneys
21 and accountants, the Office of the United States Trustee, or any person employed in the Office of

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1 the United States Trustee and that the Firm and each of its attorneys are all disinterested persons
2 pursuant to 11 U.S.C. § 101(14).

3 20. Victoria L. Nelson, Esq., a former Chapter 7 panel trustee, was previously a
4 member of the Firm.

5 21. Bradley G. Sims, Esq., an attorney employed by the Firm, is the Chapter 7 Trustee
6 appointed in the Debtor’s bankruptcy case.

7 22. The Firm also represents Chapter 7 Trustees in unrelated bankruptcy cases pending
8 before the United States Bankruptcy Court for the District of Nevada.

9 23. The Trustee has employed the Firm in other bankruptcy cases unrelated to the
10 above-referenced bankruptcy case in which he is a Trustee.

11 24. The Trustee submits that the Firm is a disinterested person within the meaning of
12 11 U.S.C. § 101(14) for purposes of 11 U.S.C. § 327(a), as it pertains to representing the Trustee
13 as general bankruptcy counsel in the Debtor’s bankruptcy case.

14 **IV. COMPENSATION**

15 25. Subject to Court approval, in accordance with 11 U.S.C. § 330, the Trustee seeks
16 to retain the Firm on an hourly basis at the customary and standard rates that the Firm charges for
17 similar representation, plus reimbursement of actual and necessary expenses incurred by the Firm
18 in performing its duties.

19 26. The Firm proposes the compensation of attorneys be at varying rates currently
20 ranging from \$500 per hour to \$550 per hour for the services of attorneys, subject to change from
21 time to time, and all subject to application to, and approval by, this Court pursuant to Sections
22 330 and 331 of the Bankruptcy Code.

23 27. The Firm proposes the compensation of paraprofessionals be at varying rates
24 currently ranging from \$250 per hour for paraprofessionals, subject to change from time to time,
25 and all subject to application to, and approval by, this Court pursuant to Sections 330 and 331 of
26 the Bankruptcy Code. A true and correct copy of the proposed Retainer Agreement between the
27 Trustee and the Firm is attached to the Houmand Declaration as **Exhibit “1”**.

28 . . .

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28. The Firm contemplates that it may seek interim compensation during this case as permitted by 11 U.S.C. § 331 and Federal Rule of Bankruptcy Procedure 2016. The Firm understands that its compensation is subject to prior Court approval.

29. No promises have been received by the Firm or any attorney of the Firm, as to payment or compensation in connection with the above-referenced bankruptcy case in accordance with the provisions of the Bankruptcy Code, the FRBP, the Local Rules, and orders of the Court. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm, except as permitted under Section 504(b)(1).

V. CONCLUSION

For the foregoing reasons, the Trustee respectfully requests that the Court enter an Order: (a) approving the employment of the Firm as general bankruptcy counsel, effective as of the date of the filing of the Application, to represent the Trustee in this bankruptcy proceeding upon the terms set forth in this Application with payment of all fees and costs by the estate subject to notice and hearing and approval of this Court; and (b) for such other and further relief as is just and proper.

Dated this 30th day of April, 2026.

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