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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

**DECLARATION OF BRADLEY G. SIMS IN
SUPPORT OF 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. Barnes

I, Bradley G. Sims, hereby declare as follows:

1. I am over the age of 18 and mentally competent. Except where stated on information and belief, I have personal knowledge of the facts in this matter and if called upon to testify, could and would do so.

2. I make this declaration to support the *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* (the "Application").

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

2 4. On March 19, 2026, an involuntary bankruptcy petition was filed against
3 Cartwheel Robotics, Inc. (the "Debtor"). The petitioning creditors were RSF Robotics I, a series
4 of RSF Master, LLC, Wong Family Revocable Trust, and Nevada Battle Born Growth Escalator,
5 Inc. (collectively, the "Petitioning Creditors").

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

8 6. On April 16, 2026, I was appointed as the Chapter 7 Trustee in the Debtor's
9 bankruptcy case.

10 7. On April 27, 2026, the Court entered an *Order Granting Motion for Turnover of*
11 *Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(e)* [ECF No. 36] and an *Order Granting*
12 *Motion for Turnover of Bankruptcy Estate Property Pursuant to 11 U.S.C. § 542(a)* [ECF No. 37]
13 that required Scott LaValley ("Mr. LaValley") to turnover documents related to the Debtor's
14 assets and financial affairs.

15 8. The Debtor has failed to timely file its statement of assets and statement of
16 financial affairs.

17 9. I believe that the Debtor may have transferred significant assets to third parties
18 prior to the commencement of his bankruptcy case and require the assistance of counsel to
19 determine if such transfers can be avoided and recovered for the benefit of the Debtor's creditors.

20 10. Accordingly, I have determined that I will require assistance in administering the
21 Debtor's bankruptcy case.

22 11. In order to assist me in administering the Debtor's bankruptcy case, recovering
23 other assets which may be available for distribution to creditors and fulfilling my statutory
24 obligations under Section 704 of Title 11, including my responsibility to investigate the financial
25 affairs of the Debtor, I now desire to employ the Houmand Law Firm, Ltd. (the "Firm"), as my
26 general bankruptcy counsel in the Debtor's bankruptcy case.

27 12. The Application seeks employment of the Firm effective as of the date of the filing
28 of the Application.

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1 13. The Firm is well suited for the type of representation required by me. The Firm
2 specializes in insolvency and reorganization matters, particularly the representation of Chapter 7
3 Trustees in bankruptcy cases. Attorneys associated with the Firm have represented debtors,
4 Chapter 7 Trustees, creditors, and other parties-in-interest, and is qualified to act as counsel for
5 me. Accordingly, I have determined that the Firm has the resources and experience necessary to
6 represent me in this case.

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

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

15 16. I desire to employ the Firm as my general counsel in this bankruptcy case to render
16 the following professional services:

- 17 (a) To investigate the financial affairs of the Debtor and
18 determine if there are any preferential transfers, fraudulent
19 conveyances, or turnover actions that may be filed on behalf
20 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
21 547, and 548.
- 22 (b) To prosecute any and all preferential transfers, fraudulent
23 conveyances, or turnover actions that may be filed on behalf
24 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
25 547, and 548.
- 26 (c) To advise me of my rights and obligations and performance
27 of my duties during the administration of this bankruptcy
28 case;
- (d) To represent me in all proceedings before this Court and any
 other court which assumes jurisdiction of a matter related to
 or arising in this bankruptcy case;

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- 1 (e) To assist me in the performance of my duties as set forth in
- 2 11 U.S.C. § 704;
- 3 (f) To assist me in developing legal positions and strategies
- 4 with respect to all facets of these proceedings; and
- 5 (g) To provide such other counsel and advice as I may require
- 6 in connection with this bankruptcy case.

7 17. I have selected the Firm because its attorneys have experience in matters of this
8 character, are familiar with bankruptcy practice and the administration of the Debtor's bankruptcy
9 case and are qualified to represent me in this case.

10 18. I am aware that Victoria L. Nelson, Esq., a former Chapter 7 panel Trustee, was
11 previously a member of the Firm.

12 19. I am an attorney employed by the Firm and a Chapter 7 panel trustee in Reno,
13 Nevada.

14 20. I have employed the Firm in other bankruptcy cases unrelated to the above-
15 referenced bankruptcy case.

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

18 Dated this 30th day of April, 2026.

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

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