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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

**NOTICE OF HEARING ON 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<sup>1</sup>

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. §*

<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”.

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

2 The Application seeks to employ the Houmand Law Firm, Ltd. (the “Firm”) as general  
3 bankruptcy counsel pursuant to 11 U.S.C. §§ 327(a) and Federal Rule of Bankruptcy Procedure  
4 2014. Subject to Court approval, in accordance with 11 U.S.C. § 330, the Trustee seeks to retain  
5 the Firm on an hourly basis at the customary and standard rates that the Firm charges for similar  
6 representation, plus reimbursement of actual and necessary expenses incurred by the Firm in  
7 performing its duties. The Firm proposes the compensation of attorneys be at varying rates  
8 currently ranging from \$500 per hour to \$550 per hour for the services of attorneys, subject to  
9 change from time to time, and all subject to application to, and approval by, this Court pursuant to  
10 Sections 330 and 331 of the Bankruptcy Code. The Firm proposes the compensation of  
11 paraprofessionals be at varying rates currently ranging from \$250 per hour for paraprofessionals,  
12 subject to change from time to time, and all subject to application to, and approval by, this Court  
13 pursuant to Sections 330 and 331 of the Bankruptcy Code. The Application requests that the  
14 employment of the Firm effective as of the date of the filing of the Application. Bradley G. Sims,  
15 Esq., an attorney employed by the Firm, is the Chapter 7 Trustee appointed in the Debtor’s  
16 bankruptcy case.

17 A copy of the Application, the *Declaration of Jacob L. Houmand, Esq. In Support of*  
18 *Application to Employ Houmand Law Firm, Ltd. As General Bankruptcy Counsel for Bradley G.*  
19 *Sims, Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy*  
20 *Procedure 2014*, and the *Declaration of Bradley G. Sims In Support of Application to Employ*  
21 *Houmand Law Firm, Ltd. As General Bankruptcy Counsel for Bradley G. Sims, Chapter 7*  
22 *Trustee Pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014*, are on  
23 file with the Clerk’s Office of the United States Bankruptcy Court, C. Clifton Young Federal  
24 Building, 300 Booth Street, Fifth Floor, Courtroom No. 2, Reno, Nevada 89509. Copies of the  
25 Application and any supporting declarations may also be obtained from counsel for the Trustee or  
26 through the Bankruptcy Court’s website at [www.nvb.uscourts.gov](http://www.nvb.uscourts.gov).

27 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief  
28 sought in the Application, or if you want the Court to consider your views on the Application,

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1 then you must file an opposition with the Court, and serve a copy on the person making the  
2 Application *no later than fourteen (14) days preceding the hearing date for the Application.*

3 The opposition must state your position, set forth all relevant facts and legal authority, and  
4 be supported by affidavits or declarations that conform to Local Rule 9014(c).

5 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading  
6 with the court. You *must* also serve your written response on the person who sent you this  
7 notice.

8 If you do not file a written response with the court, or if you do not serve your written  
9 response on the person who sent you this notice, then:

- 10 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 11 • The Court may *rule against you* without formally calling the matter at the hearing.

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13 **NOTICE IS FURTHER GIVEN** that a hearing on said Application will be held before a  
14 United States Bankruptcy Judge, in the C. Clifton Young Federal Building, 300 Booth Street,  
15 Fifth Floor, Courtroom No. 2, Reno, Nevada on June 11, 2026, at 11:00 a.m. The Court will  
16 conduct a telephonic hearing on the Application. The toll-free conference line 1 (833) 435-1820,  
17 Meeting ID: 160 532 0260, and the participant code is 643758#. Please check the Bankruptcy  
18 Court's website prior to the hearing to confirm the call-in information, at:  
19 <https://www.nvb.uscourts.gov/calendars/court-calendars/>. Parties are also permitted to attend the  
20 hearing in person.

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