UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

RECEIVED
AND FILED

MAY 20 2026

US BANKRUPTCY COURT
DANIEL S OWENS, CLERK

In re

CARTWHEEL ROBOTICS, INC ,

Debtor

Case No **26-50278-HLB**

Chapter 7

OPPOSITION OF SCOTT LAVALLEY TO TRUSTEE'S MOTION FOR ORDER (I) DESIGNATING SCOTT LAVALLEY AS PERSON REQUIRED TO PERFORM 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

Judge Honorable Hilary L Barnes

Scott LaValley, representing himself pro se individually and not as counsel for Cartwheel Robotics, Inc (the "Debtor"), submits this opposition to the Chapter 7 Trustee's 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, filed at ECF No 41 (the "Motion")

In support of this Opposition, Mr LaValley states as follows

I. Introduction

1 Mr LaValley intends to appear at the currently scheduled § 341 meeting on May 21, 2026, and answer questions truthfully under oath based on his personal knowledge Mr LaValley does not seek to avoid examination His objection is to being compelled to recreate, prepare, and certify complete corporate bankruptcy schedules and statements from memory, speculation, raw financial information he is not qualified to interpret for bankruptcy reporting purposes, or records he does not possess, control, or have access to

2 Mr LaValley also remains willing to provide reasonable cooperation to the Trustee in identifying, to the extent known, possible sources or custodians of records Nothing in this Opposition should be construed as a representation that Mr LaValley has possession, custody, or control of Debtor records or property

3 The Motion specifically seeks an order compelling Mr LaValley to file complete schedules of assets and liabilities, a statement of financial affairs, and all required documents within fourteen (14) days of entry of the order That relief is overbroad and would impose an impossible, professionally inappropriate, and personally disproportionate burden

4 Any order should be narrowly tailored to require reasonable cooperation and testimony based on personal knowledge, not impossible performance, speculative reconstruction, or uncompensated accounting, bookkeeping, or bankruptcy schedule-preparation work

II. Relevant Background

5 Mr LaValley has already filed a sworn declaration with this Court addressing his lack of possession, custody, or control over Cartwheel Robotics, Inc 's property, records, systems, and administrative accounts Mr LaValley incorporates that declaration by reference

6 As of the date of this filing, Mr LaValley does not have possession, custody, or control over the Debtor's books, records, systems, assets, property, financial systems, accounting systems, or administrative accounts

7 The Debtor is not currently operating as an active business

8 The Motion states that Mr LaValley was the Debtor's president and person in control as of the petition date and asserts that he is the individual most knowledgeable regarding the Debtor's financial affairs, assets, and records Mr LaValley disputes any implication that he currently has possession, custody, control, access, or the professional accounting ability necessary to prepare complete and accurate schedules and statements for the Debtor

9 Mr LaValley is not personally a debtor in bankruptcy The debtor is Cartwheel Robotics, Inc

10 Mr LaValley is not a CPA, accountant, bookkeeper, bankruptcy professional, financial records custodian, or current operator of an ongoing business He is not being compensated by the estate

11 Mr LaValley is currently attempting to maintain full-time employment while responding to demands in this bankruptcy case He is not in a practical, financial, or professional position to absorb the burden the Trustee seeks to impose

III. Mr. LaValley Does Not Object to Appearing and Testifying Based on Personal Knowledge

12 Mr LaValley intends to appear at the currently scheduled § 341 meeting on May 21, 2026, and answer questions truthfully under oath based on his personal knowledge

13 Mr LaValley's willingness to cooperate should not be converted into an order requiring him to perform tasks that he cannot truthfully or reliably perform

14 Mr LaValley can testify to what he personally knows He can explain the limits of his knowledge and access He can identify possible sources of information to the extent known But he is not an accountant, CPA, bookkeeper, or bankruptcy professional, and he cannot personally prepare or truthfully certify complete corporate schedules and statements based on memory, speculation, raw financial information, or records outside his possession, custody, or control Preparing such schedules would require qualified professionals

IV. The Motion Is Overbroad to the Extent It Seeks to Compel Reconstruction of Corporate Schedules and Statements from Memory, Speculation, or Raw Records Mr. LaValley Is Not Qualified to Interpret

15 The Trustee's Motion asks the Court to designate Mr LaValley as the person required to perform duties of the Debtor under FRBP 9001(b)(5) Mr LaValley does not dispute that a corporate debtor can act only through a human representative

16 The issue is not whether someone may be examined or asked to cooperate The issue is whether the Court should compel an individual who is not personally a debtor in bankruptcy to recreate and certify complete corporate bankruptcy schedules and statements within fourteen (14) days where that individual lacks possession, custody, control, access, and the accounting expertise necessary to do so

17 The proposed relief is overbroad because it would effectively require Mr LaValley to reconstruct the Debtor's books and records from memory, speculation, or raw financial data he is not qualified to interpret for bankruptcy reporting purposes

18 Preparing corporate bankruptcy schedules is not a simple clerical task under these circumstances It requires determining assets, liabilities, secured claims, priority claims, executory contracts, transfers, financial history, account balances, creditor information, and other categories of information with accuracy sufficient for filing under penalty of perjury

19 Compelling Mr LaValley to perform that work would not assist the estate It would risk producing schedules that are incomplete, inaccurate, heavily qualified, and potentially misleading It would create a false appearance of precision where none exists

20 If the estate requires schedules to be prepared from corporate records, bank records, accounting data, creditor records, tax records, or third-party source documents, that work should be performed by the Trustee, an estate-retained accountant, a CPA, a bookkeeper, or another qualified professional authorized by the Court

V. The Requested Relief Would Impose an Undue Burden and Improperly Shift Estate Administration Work to Mr. LaValley Personally

21 The burden imposed by the Motion is not theoretical Mr LaValley is currently employed full-time and is under significant personal financial strain

22 The Trustee's requested relief would require Mr LaValley to personally perform substantial, open-ended, uncompensated work for the estate, including accounting, bookkeeping, and bankruptcy schedule-preparation work he is not qualified to perform and cannot accurately complete

23 The time and disruption required to attempt that reconstruction could jeopardize Mr LaValley's employment and cause severe personal financial harm

24 That burden is especially unjustified where any schedules prepared under these circumstances would necessarily be incomplete, heavily qualified, and based on limited memory rather than reliable source documents

25 The Trustee has tools available to investigate the Debtor's affairs, obtain records from third parties, seek turnover where appropriate, and retain professionals when accounting, bookkeeping, or reconstruction work is necessary

26 If corporate schedules must be prepared from bank records, creditor information, accounting data, tax records, or other third-party source documents, that is estate administration work It should be performed through the estate process by the Trustee or qualified estate-retained professionals, not imposed as an uncompensated personal obligation on Mr LaValley

27 Mr LaValley has no comparable mechanism here He is not personally the debtor, is not estate-retained, is not being compensated, and is being asked to personally absorb time, cost, job risk, and professional burdens that belong, if anywhere, in the estate administration process

VI. Any Order Should Be Narrowly Tailored to Require Reasonable Cooperation, Not Impossible Performance

28 If the Court grants any portion of the Motion, Mr LaValley respectfully requests that the order be narrowly tailored

29 A reasonable order could require Mr LaValley to

a appear at the § 341 meeting,

b answer questions truthfully under oath based on his personal knowledge,

c identify, to the extent known, possible sources or custodians of records, and

d cooperate reasonably with the Trustee's efforts to obtain records from third parties, without finding or implying that Mr LaValley currently has possession, custody, control, or access to Debtor records, property, or systems

30 But any order should also make clear that Mr LaValley is not required to

a recreate complete corporate schedules and statements from memory, speculation, or raw financial information he is not qualified to interpret for bankruptcy reporting purposes,

b certify schedules or statements as complete and accurate where he lacks records or professional accounting support necessary to verify them,

c obtain or produce records outside his possession, custody, or control,

d perform open-ended forensic accounting, bookkeeping, or bankruptcy schedule preparation work for the estate without compensation, or

e take action on behalf of the corporate debtor beyond reasonable cooperation in his individual capacity and based on personal knowledge

31 Such a tailored order would preserve the Trustee's ability to examine Mr LaValley and obtain whatever information he can truthfully provide, while avoiding an impossible and disproportionate burden on an individual who is not personally a debtor in bankruptcy

VII. Conclusion

WHEREFORE, Mr LaValley respectfully requests that the Court enter an order

1 Denying the Motion to the extent it seeks to compel Mr LaValley to recreate and certify complete corporate bankruptcy schedules and statements from memory, speculation, raw financial information, or records outside his possession, custody, or control,

2 Alternatively, if the Court grants any portion of the Motion, limiting any order to recognizing Mr LaValley's appearance at the currently scheduled § 341 meeting and requiring only reasonable cooperation based on personal knowledge, including identifying any known custodians or sources of records, without finding or implying that Mr LaValley currently has possession, custody, control, or access to Debtor records, property, or systems,

3 Clarifying that Mr LaValley is not required to perform uncompensated accounting, bookkeeping, forensic reconstruction, or bankruptcy schedule-preparation work for the estate, and

4 Granting such other and further relief as the Court deems just and proper

Dated May 20, 2026

Scott LaValley, Pro Se
Individual and Party in Interest
5586 Rivers Edge Drive
Fallon, NV 89406
lavalley scott@gmail com