

## **UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA**

In re:

CARTWHEEL ROBOTICS, INC.,

Debtor.

Case No. 26-50278-hlb

### **LIMITED RESPONSE AND OPPOSITION OF SAMANTHA CONWAY TO JOINDER**

I, Samantha Conway, appearing pro se and on my own behalf as a creditor in this bankruptcy case, state as follows:

1. After becoming aware that my name had been included in the filed Joinder and that relief was being requested that could affect me, I submit this Limited Response and Opposition to clarify my current status and my opposition to being designated to perform the duties of the Debtor.
2. I am not currently an officer, director, employee, manager, authorized representative, or agent of the Debtor.
3. During my time with Cartwheel Robotics, Inc., I performed a variety of administrative and operational support functions. As is common in small and underfunded startups, responsibilities often overlapped among personnel and outside professionals.
4. The Petitioning Creditors' request appears to be based primarily upon former titles and relationships. While I previously held officer titles with the Debtor, those titles do not establish that I possess the records, expertise, authority, or comprehensive knowledge necessary to perform the duties contemplated by Rule 9001(b)(5).
5. Cartwheel's information, records, operations, finances, legal matters, technical activities, and business affairs were not maintained by any one individual. Relevant information was distributed among company personnel, outside accountants, legal counsel, technical staff, investors, service providers, third-party platforms, and various electronic systems.

6. Certain categories of information were maintained by specialized personnel, professionals, or systems. Accounting and tax matters were handled with the assistance of outside accounting professionals. Corporate governance matters were prepared with assistance of legal counsel. Capitalization records were maintained through third-party platforms. Technical development records were maintained by engineering and software personnel. I do not possess the expertise or access necessary to independently recreate or verify those records.
7. I am an engineer by education; however, I did not serve in an engineering role at Cartwheel and was not responsible for the company's software, robotics, intellectual property development, source code, technical architecture, or engineering management. I do not possess the specialized technical expertise necessary to reconstruct those aspects of the business.
8. I was not the company's CPA, tax preparer, corporate attorney, bankruptcy professional, valuation expert, technical lead, or custodian of all company records. I do not possess the specialized expertise necessary to independently reconstruct the Debtor's accounting records, tax filings, capitalization history, financing transactions, legal affairs, technical assets, or corporate governance history.
9. To the extent designation would require gathering, reporting, verifying, certifying, or reconstructing information concerning the Debtor, I do not possess the records, expertise, or access necessary to perform those functions.
10. Cartwheel ceased operations about 6 months ago. Since that time, records and information have become dispersed among numerous individuals and third parties, and my recollection of specific transactions and events has naturally diminished. Memory is not a substitute for contemporaneous books and records.
11. To the extent I possess personal knowledge regarding historical events involving Cartwheel, I will respond truthfully regarding matters within my personal knowledge if properly requested to do so. However, I do not possess the records, expertise, authority, or present ability necessary to serve as the individual responsible for reconstructing, certifying, or otherwise administering the affairs of the Debtor.

12. In addition to the foregoing, designation would impose a substantial personal burden. I am currently assisting my husband through significant ongoing medical issues and remain responsible for important family obligations, including care of my minor child. I am also working to recover from significant personal and financial disruptions resulting from the company's failure, including long-delayed obligations that were deferred during my involvement with Cartwheel. In addition, I have longstanding commitments during July and August 2026 that will substantially limit my availability. These obligations materially limit my ability to undertake the extensive effort that would be required to reconstruct years of corporate records, activities, and transactions.
13. For all of these reasons, I respectfully submit that I am not an appropriate candidate for designation as the person responsible for performing the duties of the Debtor.

Dated: 6/3/2026

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'SC', is written over a horizontal line. The signature is fluid and cursive.

Samantha Conway  
Pro Se Creditor