UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:
CARTWHEEL ROBOTICS, INC.,
Debtor.

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

NOTICE OF PROCEDURAL IMPASSE AND REQUEST FOR CLARIFICATION, PROFESSIONAL SUPPORT, AND EXTENSION REGARDING ECF NO. 80

Scott LaValley, appearing pro se individually, as a secured creditor and party in interest, and as a Court-designated responsible person under ECF No. 80 for the limited purpose of seeking clarification regarding that designation, respectfully submits this Notice of Procedural Impasse and Request for Clarification, Professional Support, and Extension regarding the Court’s June 11, 2026 Order [ECF No. 80].

This filing is submitted only by Mr. LaValley on his own behalf and in response to obligations imposed on him by ECF No. 80. Mr. LaValley does not purport to appear as counsel for the Debtor, does not purport to represent the Debtor, and does not purport to speak for, represent, or respond on behalf of Samantha Conway.

This filing is not a refusal to comply with ECF No. 80. It is an effort to comply in a lawful, accurate, and procedurally proper manner without engaging in unauthorized corporate representation, without making legal admissions on behalf of the Debtor, and without certifying corporate records that Mr. LaValley does not possess, control, or have access to.

I. INTRODUCTION

1. On June 11, 2026, the Court entered an Order designating Mr. LaValley and Samantha Conway as persons required to act on behalf of the Debtor pursuant to Federal Rule of Bankruptcy Procedure 9001(b)(5) and requiring them to prepare and file the Debtor's schedules, statement of financial affairs, and creditor mailing matrix within fourteen calendar days after entry of the Order.

2. Mr. LaValley does not seek to avoid compliance with the Court's Order.

3. However, ECF No. 80 creates a procedural impasse that Mr. LaValley cannot resolve without clarification from the Court.

4. The Debtor is a corporation.

5. Mr. LaValley is not counsel for the Debtor.

6. The Debtor has no funds available to retain counsel.

7. Mr. LaValley understands that a corporation generally must appear through counsel.

8. Mr. LaValley further understands that the Court has previously declined to treat filings submitted by Mr. LaValley as filings by the Debtor because they were not submitted by corporate counsel.

9. At the same time, ECF No. 80 now directs Mr. LaValley and Ms. Conway to prepare and file corporate bankruptcy documents on behalf of the Debtor.

10. Mr. LaValley therefore does not understand the procedural mechanism by which he is expected to comply with ECF No. 80 if the Debtor cannot appear without counsel, the Debtor has no counsel, the Debtor has no funds to retain counsel, and Mr. LaValley is not permitted to speak or file on behalf of the Debtor as corporate counsel.

11. This is not a refusal to comply.

12. It is a request for clarification of the mechanism by which compliance is possible.

13. Mr. LaValley also respectfully submits that the continued 341 examination and related filings have created practical and personal-risk issues that cannot be ignored. Mr. LaValley is being directed to act for a corporate Debtor while creditor counsel advances adverse theories that may expose Mr. LaValley personally, yet the Debtor remains without corporate counsel or professional support.

14. Mr. LaValley is willing to answer factual questions truthfully based on personal knowledge. He cannot safely or fairly provide corporate legal positions, litigation admissions, reconstructed financial schedules, or record certifications for the Debtor without clarification, records, corporate counsel, and appropriate professional support.

15. Without clarification and protection, Mr. LaValley is being placed in a no-win position: either continue participating in an adversarial process that may generate evidence for anticipated litigation against him personally, or risk being characterized as noncompliant with an order requiring him to act for an unrepresented corporate Debtor.

16. The practical problem is also temporal. Nearly six months have passed since Cartwheel ceased operations, vacated the premises, assigned or surrendered assets to the secured creditor / landlord, and closed the company's operating chapter.

17. After Cartwheel ceased operations and assets were assigned or surrendered to the secured creditor / landlord, Mr. LaValley did not maintain Cartwheel's operating systems, cloud services,

paid software subscriptions, remote repositories, accounting access, payroll access, administrative accounts, or institutional records as a functioning business environment.

18. Mr. LaValley does not know whether any other person or entity maintained any such systems, services, accounts, repositories, or records after the assignment or surrender of assets. To the extent any systems, subscriptions, or services were not assigned, maintained, or paid by another party, Cartwheel had ceased operations and had no funds available to continue paying for or maintaining them.

19. The Court's Order now requires Mr. LaValley and Ms. Conway to prepare corporate bankruptcy schedules and related filings after the company has been closed for nearly six months, after assets and records were assigned or surrendered to the secured creditor / landlord, and after the ordinary business systems needed to prepare those filings may no longer exist, may no longer be accessible, or may no longer be complete.

20. That is the core practical impasse. Mr. LaValley is not being asked to complete schedules from a live business with maintained books and records. He is being asked to reconstruct where a defunct company left off nearly six months ago, without corporate counsel, without professional accounting support, without control of complete company records, and without assurance that the underlying systems or records still exist.

II. SEPARATE NOTICE OF CLARIFICATION

21. Mr. LaValley has separately filed, or intends to file, a Notice of Clarification addressing Petitioning Creditors' characterizations at the June 9, 2026 hearing.

22. That separate notice addresses Petitioning Creditors' hearing arguments regarding alleged control, possession of records, payroll access, family relationships, UCC timing, Engineered Arts communications, and alleged collusion.

23. This filing is narrower.

24. This filing concerns the practical and procedural requirements, support, records, professional assistance, capacity clarification, and deadline extension necessary to comply with ECF No. 80.

III. PROCEDURAL IMPASSE REGARDING CORPORATE REPRESENTATION

25. The central issue requiring clarification is that Mr. LaValley has been ordered to assist with filings for a corporate Debtor, but he is not counsel for the Debtor.

26. Mr. LaValley does not wish to engage in the unauthorized practice of law.

27. Mr. LaValley does not wish to make legal determinations for the Debtor.

28. Mr. LaValley does not wish to file documents in a representative legal capacity beyond what the Court has specifically authorized.

29. Mr. LaValley also does not want a filing submitted in good-faith response to ECF No. 80 to be ignored, rejected, disqualified, or treated as procedurally improper because it was not submitted by corporate counsel.

30. That concern is not hypothetical.

31. Mr. LaValley understands that the Court has previously declined to treat filings submitted by him as filings by the corporate Debtor because they were not submitted by corporate counsel.

32. Mr. LaValley therefore respectfully requests that the Court or Trustee clarify exactly how Mr. LaValley is expected to proceed.

33. Specifically, Mr. LaValley requests clarification whether any schedules, statement of financial affairs, creditor matrix, declarations, notes, explanations, or related filings submitted pursuant to

ECF No. 80 will be accepted as filings made by a Court-designated individual under Rule 9001(b)(5), notwithstanding the fact that Mr. LaValley is not corporate counsel.

34. Mr. LaValley also requests clarification whether he is expected to sign any such filings in his individual capacity as a Court-designated person, rather than as counsel for the Debtor.

35. Without that clarification, Mr. LaValley does not know how to comply without risking either noncompliance with ECF No. 80 or improper unauthorized representation of the corporate Debtor.

IV. NOTICE OF UNAVAILABILITY

36. Mr. LaValley previously filed a Notice of Unavailability advising the Court and parties that he would be unavailable for two separate two-week periods: June 15, 2026 through June 27, 2026, and July 20, 2026 through August 1, 2026.

37. The fourteen-day deadline imposed by ECF No. 80 falls directly within the first noticed period of unavailability.

38. Mr. LaValley respectfully submits that this creates an additional practical impediment to compliance, particularly where the required filings also require access to records, professional assistance, identification of the required forms and format, and clarification of the capacity in which Mr. LaValley is expected to act.

V. RECORDS ARE NECESSARY TO SUPPORT COMPLIANCE, AND NEARLY SIX MONTHS HAVE PASSED SINCE THE COMPANY CLOSED

39. As previously explained in Mr. LaValley's prior filings, he is not a bookkeeper, accountant, CPA, tax professional, bankruptcy attorney, or corporate bankruptcy professional.

40. Mr. LaValley also does not have possession, custody, or control of the Debtor's complete books, records, accounting systems, payroll records, tax records, vendor records, bank records, financial systems, asset records, or corporate records necessary to prepare the Debtor's schedules, statement of financial affairs, and creditor mailing matrix.

41. The schedules, statement of financial affairs, and creditor mailing matrix require information concerning the Debtor's assets, liabilities, creditors, transfers, payments, contracts, leases, payroll, taxes, financial accounts, books and records, and financial history.

42. Those filings cannot be accurately prepared from memory.

43. This problem is compounded because nearly six months have passed since Cartwheel ceased operations, vacated the premises, laid off its team, assigned or surrendered assets and records to the secured creditor / landlord, and stopped operating as a functioning company.

44. After Cartwheel ceased operations and assets were assigned or surrendered to the secured creditor / landlord, Mr. LaValley did not maintain Cartwheel's operating systems, cloud services, paid software subscriptions, remote repositories, accounting access, payroll access, administrative accounts, or institutional records as a functioning business environment.

45. Mr. LaValley does not know whether any other person or entity maintained any such systems, services, accounts, repositories, or records after the assignment or surrender of assets. To the extent any systems, subscriptions, or services were not assigned, maintained, or paid by another party, Cartwheel had ceased operations and had no funds available to continue paying for or maintaining them.

46. Mr. LaValley does not know which records still exist, which records have been preserved, which systems remain accessible, which subscriptions lapsed, which files were retained by third parties, which files were lost, or which information can still be verified.

47. ECF No. 80 therefore requires reconstruction of a closed company from a nearly six-month-old stopping point, not completion of schedules from live, maintained corporate records.

48. That distinction matters.

49. Mr. LaValley cannot truthfully certify complete corporate schedules, accounting information, payroll information, creditor information, transfer information, or asset information without source records, professional assistance, and access to whatever records may still exist.

50. To support compliance with the Court's Order, Mr. LaValley respectfully requests that the Trustee obtain, provide access to, or identify the Debtor's available source records to the extent such records are in the Trustee's possession, custody, control, or obtainable through subpoena or third-party production.

51. Those records may include, without limitation, records from QuickBooks/Intuit, Gusto, the Debtor's banks, Deane Albright as the Debtor's CPA or accounting professional, tax agencies, prior counsel, corporate counsel, payroll providers, former employees, technical custodians, cloud-service providers, and any custodians of the Debtor's assets, systems, or records.

52. Mr. LaValley also requests that the Trustee identify any additional record sources the Trustee believes Mr. LaValley should review or rely upon in preparing the ordered filings.

53. If records no longer exist, are unavailable, have not been maintained, are held by third parties, or cannot be accessed without administrative credentials or paid subscriptions, Mr. LaValley requests clarification that he may identify those limitations rather than attempt to reconstruct or certify unavailable records.

VI. EXACT FORMS, FORMAT, AND LEVEL OF DETAIL SHOULD BE IDENTIFIED

54. Mr. LaValley respectfully requests that the Trustee identify exactly which official bankruptcy forms, schedules, statements, declarations, matrix format, supporting materials, and level of detail the Trustee expects Mr. LaValley to complete and file.

55. Mr. LaValley is not a bankruptcy attorney or bankruptcy professional.

56. Mr. LaValley is not in a position to guess which forms the Trustee expects, how those forms should be completed, what supplemental materials should be attached, how unavailable information should be presented, or how claims should be classified.

57. To support compliance with ECF No. 80, the Trustee should identify the exact forms and format expected, including how the Trustee expects Mr. LaValley to present information that is unknown, unavailable, disputed, incomplete, not professionally verified, or outside Mr. LaValley's knowledge, possession, custody, or control.

VII. PROFESSIONAL SUPPORT AND PROCEDURAL PROTECTIONS ARE REQUIRED

58. Even if records are obtained, Mr. LaValley is not qualified to interpret accounting records, reconcile accounts, classify claims, determine claim priorities, calculate tax obligations, or prepare corporate bankruptcy schedules without appropriate professional assistance.

59. Mr. LaValley therefore requests that appropriate accounting, bookkeeping, tax, bankruptcy, and/or legal professional support be made available to assist with preparation of the Debtor's schedules, statement of financial affairs, and creditor mailing matrix.

60. Professional support is also necessary because the continued 341 examination and related filings have moved beyond routine information gathering.

61. Petitioning Creditors have already indicated that litigation is anticipated or under consideration.

62. Petitioning Creditors' counsel has demanded preservation of Mr. LaValley's personal Gmail account on the stated basis that litigation is anticipated.

63. Petitioning Creditors and their counsel have also advanced theories concerning insider transfers, avoidance claims, alleged collusion, alleged control by the landlord, fiduciary-duty issues, and potential rights and remedies against the Debtor, insiders, family creditors, and related parties.

64. This creates a fundamental unfairness.

65. Mr. LaValley has been ordered to act for a corporate Debtor that has no counsel and no funds to retain counsel.

66. At the same time, creditor counsel is questioning Mr. LaValley in an adversarial setting and developing theories that may later be used against him personally.

67. Mr. LaValley should not be placed in the position of choosing between two unacceptable outcomes: continuing to answer aggressive or litigation-oriented questioning without counsel or procedural protections, thereby risking personal exposure, or declining to proceed and risking an accusation of noncompliance with the Court's Order.

68. That is the procedural impasse.

69. Mr. LaValley is willing to answer factual questions truthfully based on personal knowledge.

70. But he cannot safely or fairly act as the Debtor's unpaid legal representative, accountant, records custodian, forensic reconstruction agent, or source of corporate litigation admissions while creditor counsel advances adverse theories against him, Samantha Conway, family creditors, related parties, and the Debtor.

71. Mr. LaValley should not have to personally fund counsel for the Debtor in order to comply with an order requiring corporate Debtor duties.

72. Nor should Mr. LaValley be required to continue exposing himself personally to adversarial litigation questioning where anything he says may later be used against him, while the corporate Debtor remains unrepresented.

73. If questioning remains limited to factual matters within Mr. LaValley's personal knowledge, possession, custody, or control, Mr. LaValley will continue to cooperate in good faith.

74. If the questioning instead becomes aggressive, accusatory, or directed toward building litigation claims against Mr. LaValley, Samantha Conway, family creditors, related parties, or the Debtor, then Mr. LaValley respectfully submits that the parties are at a complete procedural impasse unless and until the Debtor is provided corporate counsel, appropriate professional support, and adequate procedural protections.

75. Mr. LaValley does not seek to obstruct the Trustee's investigation.

76. He seeks a fair and lawful mechanism for compliance that does not require him to personally fund the Debtor's representation, act as corporate counsel, create corporate legal positions, certify reconstructed records, or expose himself to adversarial litigation questioning without counsel or procedural protections.

77. Mr. LaValley does not seek to shift responsibility away from himself for information actually known to him or reasonably available to him.

78. Rather, Mr. LaValley seeks a workable mechanism to comply with the Court's Order accurately, truthfully, and without speculation, fabrication, unauthorized legal representation, professional determinations he is not qualified to make, or personal litigation exposure created by an unrepresented corporate Debtor process.

VIII. REQUEST FOR EXTENSION

79. Mr. LaValley respectfully requests that the deadline to file the schedules, statement of financial affairs, and creditor mailing matrix be extended until fourteen days after the following have occurred:

a. The Court or Trustee clarifies the procedural mechanism by which Mr. LaValley may submit filings required by ECF No. 80 without acting as corporate counsel or engaging in unauthorized representation of the Debtor;

b. The Court or Trustee clarifies whether filings submitted by Mr. LaValley pursuant to ECF No. 80 will be accepted as filings made by a Court-designated individual under Rule 9001(b)(5), notwithstanding that Mr. LaValley is not corporate counsel;

c. The Trustee obtains, provides access to, or identifies the available Debtor records necessary to prepare those filings, including records from QuickBooks/Intuit, Gusto, bank accounts, Deane Albright as CPA/accounting professional, prior counsel, corporate counsel, payroll providers, cloud-service providers, and other custodians;

d. The Trustee identifies the exact forms, schedules, statements, declarations, creditor matrix format, supporting materials, and manner in which he expects the information to be presented;

e. The filed periods of unavailability are accounted for; and

f. Appropriate professional support is made available.

80. In the alternative, if the Court requires a filing before records are obtained or made available, instructions are provided, exact forms are identified, Mr. LaValley's capacity is clarified, and professional support is available, Mr. LaValley requests clarification that any filing may be expressly preliminary, prepared only from information actually known or reasonably available to him, not a certification of complete corporate books and records, and subject to amendment after source records, professional assistance, or additional third-party productions become available.

81. Mr. LaValley further requests clarification that any such preliminary filing may use "Unknown," "Unavailable," "Disputed," "Subject to Amendment," or similar limitations where the required information is not presently available, cannot be professionally verified, is disputed, is outside Mr. LaValley's personal knowledge, or cannot be properly classified without professional assistance.

IX. CONCLUSION

82. Mr. LaValley does not seek to avoid compliance with ECF No. 80.

83. Mr. LaValley seeks clarification of the procedural mechanism necessary to comply.

84. The central issue is that Mr. LaValley has been ordered to help prepare and file corporate Debtor documents, while also understanding that the corporate Debtor cannot appear without counsel and that Mr. LaValley is not counsel for the Debtor.

85. The nearly six-month passage of time is central to this request. The company did not remain open, staffed, funded, or under Mr. LaValley's control as a functioning business during that period. Cartwheel ceased operations, assets were assigned or surrendered to the secured creditor / landlord, the operating chapter closed, and Mr. LaValley did not maintain the systems, subscriptions, accounts, or records now being requested for reconstruction.

86. Mr. LaValley respectfully submits that he cannot be required to reconstruct nearly six-month-old corporate records from memory, fragments, and unavailable systems, and then certify them as complete corporate filings without clarification, records, professional support, and protection against being forced into the role of unpaid corporate counsel or litigation representative.

87. Mr. LaValley respectfully requests that the Court clarify how he is expected to comply without engaging in unauthorized representation of the Debtor and without having any good-faith filing rejected because it was not submitted by corporate counsel.

88. Mr. LaValley further requests that the deadline to file the Debtor's schedules, statement of financial affairs, and creditor mailing matrix be extended until fourteen days after the Court or Trustee clarifies the procedural mechanism for filing, the Trustee obtains, provides access to, or identifies the necessary records, the Trustee identifies the exact required forms and format, the filed unavailability periods are accounted for, and appropriate professional support is made available.

89. Alternatively, Mr. LaValley requests clarification that any required interim filing may be preliminary, limited to information actually known or reasonably available to him, not a certification of complete corporate books and records, and may use “Unknown,” “Unavailable,” “Disputed,” or “Subject to Amendment” where necessary.

Dated: June 12, 2026

Respectfully submitted,

/s/ Scott LaValley
Scott LaValley, Pro Se
Individually, as Secured Creditor and Party in Interest,
and as Court-Designated Responsible Person under ECF No. 80
for the Limited Purpose of Seeking Clarification

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