UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CARTWHEEL ROBOTICS, INC ,

Debtor

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

RENEWED NOTICE OF CONTINUING PROCEDURAL IMPASSE AND EMERGENCY REQUEST FOR CLARIFICATION AND EXTENSION OF TIME TO FILE SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS, AND CREDITOR MAILING MATRIX

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 Renewed Notice of Continuing Procedural Impasse and Emergency Request for Clarification and Extension of Time to File Schedules, Statement of Financial Affairs, and Creditor Mailing Matrix

This filing is submitted 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 Renewed Notice does not withdraw, narrow, or supersede ECF No 84 Mr LaValley incorporates ECF No 84 by reference and renews each clarification request, procedural objection, limitation, and request for professional support and extension stated therein This filing is submitted only to advise the Court that the procedural impasse remains unresolved, that the June 25, 2026 deadline is now imminent, and that additional practical obstacles have arisen or become more urgent because no guidance has been provided

I. BACKGROUND

1 On June 11, 2026, the Court entered ECF No 80, 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)

2 ECF No 80 requires Mr LaValley and Ms Conway to prepare and file the Debtor's bankruptcy schedules, statement of financial affairs, and creditor mailing matrix no later than fourteen calendar days after entry of the Order

3 Mr LaValley understands the current deadline to file the schedules, statement of financial affairs, and creditor mailing matrix to be June 25, 2026

4 On June 12, 2026, Mr LaValley filed ECF No 84, his Notice of Procedural Impasse and Request for Clarification, Professional Support, and Extension Regarding ECF No 80

5 ECF No 84 explained that Mr LaValley was not refusing to comply with ECF No 80

6 ECF No 84 explained that Mr LaValley was attempting 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 presently have access to and cannot verify

7 More than one week has passed since ECF No 84 was filed

8 The procedural impasse remains unresolved

9 Mr LaValley has not received guidance sufficient to determine how he is expected to comply with ECF No 80 without acting as corporate counsel, making legal determinations for the Debtor, certifying unavailable or unverified corporate records, or exposing himself to personal litigation risk

10 The deadline is now imminent

11 Mr LaValley therefore respectfully renews his request for clarification and seeks an extension of time pursuant to Fed R Bankr P 1007(c), Fed R Bankr P 9006(b), Fed R Bankr P 9001(b)(5), and applicable local rules

II. ECF NO. 84 REMAINS FULLY PRESERVED

12 Mr LaValley does not seek to abandon any issue, limitation, clarification request, or request for relief raised in ECF No 84

13 The issues identified in ECF No 84 remain unresolved, including without limitation

a Mr LaValley is not counsel for the corporate Debtor,

b Mr LaValley is not an attorney,

c the Debtor is a corporation and generally may appear only through counsel,

d Mr LaValley does not seek to engage in the unauthorized practice of law or act as corporate counsel, e Mr LaValley requires 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), rather than as filings by corporate counsel,

f Mr LaValley cannot truthfully certify corporate schedules, accounting information, payroll information, creditor information, transfer information, asset information, litigation information, tax information, contract information, or financial information without access to the Debtor's available source records sufficient to prepare and verify the required filings,

g Mr LaValley does not presently have access to the Debtor's books and records, accounting systems, payroll systems, bank records, tax records, vendor records, financial systems, asset records, corporate records, legal files, or other materials necessary to prepare the Debtor's schedules, statement of financial affairs, and creditor mailing matrix,

h many relevant records may be held by third-party custodians, including QuickBooks/Intuit, Gusto, banks, Deane Albright as CPA/accounting professional, prior counsel, corporate counsel, payroll providers, former employees, technical custodians, cloud-service providers, asset custodians, tax agencies, and other parties,

i the exact forms, format, supporting materials, and level of detail expected by the Trustee have not been identified,

j appropriate accounting, bookkeeping, tax, bankruptcy, and/or legal professional support has not been made available,

k Mr LaValley cannot be required to perform legal, accounting, bankruptcy, tax, claims-classification, or record-certification functions that ordinarily require counsel, accountants, or other retained professionals,

l any interim filing should be permitted to use "Unknown," "Unavailable," "Disputed," "Subject to Amendment," or similar qualifications where information is unavailable, incomplete, disputed, outside Mr LaValley's personal knowledge, or cannot be professionally verified, and m the deadline should be extended until after the Court or Trustee provides clarification, the Trustee obtains or identifies the available Debtor records, the Trustee identifies the exact forms and format expected, the noticed unavailability period is accounted for, both designated individuals receive direct instruction and a coordination process, and appropriate professional support is made available

14 This Renewed Notice is submitted because those issues remain unresolved and the deadline is now imminent

III. THE PRACTICAL PROBLEM IS NO LONGER THEORETICAL

15 The practical problem is no longer theoretical

16 ECF No 80 requires two individuals, Mr LaValley and Ms Conway, to prepare and file corporate bankruptcy schedules, a statement of financial affairs, and a creditor mailing matrix for a corporate Chapter 7 debtor within fourteen calendar days

17 The Order does not require only Mr LaValley to act

18 It requires both designated persons to act

19 ECF No 80 does not provide forms, instructions, a process for coordination, access to records, professional support, or clarification regarding how non-lawyer individuals are to file corporate schedules without acting as counsel for the Debtor

20 Since entry of ECF No 80, the Trustee has not provided guidance sufficient to resolve the procedural impasse identified in ECF No 84

21 Mr LaValley understands that Trustee's counsel requested Ms Conway's email address from Mr LaValley after entry of ECF No 80

22 However, Mr LaValley is not aware of any direct notice, service, instruction, or communication from the Trustee or Trustee's counsel to Ms Conway advising her how she is expected to participate in the preparation of the Debtor's schedules and statements before the June 25, 2026 deadline

23 This makes the coordination problem more acute, not less

24 If Trustee's counsel needed Ms Conway's contact information in order to communicate with her regarding ECF No 80, then direct communication with Ms Conway was an essential part of making the Order workable

25 Mr LaValley cannot be expected to coordinate compliance with another Court-designated person where he does not control that person, cannot compel that person's participation, and is not aware of any direct process established by the Trustee for that person to receive instructions or participate before the deadline

26 Mr LaValley does not control Ms Conway

27 Mr LaValley cannot compel Ms Conway's participation

28 Mr LaValley cannot direct Ms Conway's actions

29 Mr LaValley cannot obtain information from Ms Conway by command

30 Mr LaValley cannot certify information on Ms Conway's behalf

31 If both designated individuals are expected to work together to prepare corporate bankruptcy schedules and statements, then both designated individuals need direct notice, direct instruction, and a clear process for coordination

32 Mr LaValley further understands that the Court has now twice asked whether the Trustee or Trustee's counsel reached out to Mr LaValley to discuss this case, and the answer was no both times

33 Mr LaValley does not raise this to assign blame

34 He raises it because the absence of direct communication has practical consequences

35 The Court has imposed obligations on Mr LaValley and Ms Conway under ECF No 80

36 Mr LaValley promptly filed ECF No 84 identifying a procedural impasse

37 The Trustee has not provided guidance sufficient to resolve that impasse

38 The Trustee did not respond to Mr LaValley's request for subpoenaed bank records before the continued § 341 meeting

39 As Mr LaValley understands the record, the Trustee and Trustee's counsel have not reached out to Mr LaValley to discuss this case despite the Court asking about that twice

40 This is not a workable path to compliance

41 The current procedural posture is therefore internally inconsistent ECF No 80 requires two non-lawyer individuals to prepare corporate bankruptcy filings for an unrepresented corporate debtor, the Court has twice asked whether the Trustee or Trustee's counsel reached out to Mr LaValley to discuss this case, the answer was no both times, Trustee's counsel requested Ms Conway's email address, Mr LaValley is not aware of any direct instruction or coordination process provided to Ms Conway, the Trustee has not provided guidance sufficient to resolve ECF No 84, the Trustee did not respond to Mr LaValley's request for subpoenaed bank records, and the June 25, 2026 deadline is now imminent

42 No direct coordination process has been established

43 No professional support has been made available

44 No record-access protocol has been provided

45 No clarification has been issued despite the deadline now being imminent

46 That is the impasse

47 Mr LaValley does not seek to avoid compliance

48 He seeks a lawful and accurate means of compliance

49 But Mr LaValley cannot manufacture a functioning corporate records system, reconstruct over-six-month-old corporate schedules from memory, compel another designated person to participate, act as corporate counsel, perform legal functions he is not licensed to perform, or certify unavailable, incomplete, or unverified corporate information under penalty of perjury simply because the fourteen-day deadline is about to expire

IV. CARTWHEEL IS NO LONGER A FUNCTIONING BUSINESS WITH ACTIVE RECORD-ACCESS SYSTEMS OR PROFESSIONAL SUPPORT

50 This problem is compounded because over six months have passed since Cartwheel ceased operations and the company stopped operating as a functioning business

51 Cartwheel is not presently operating as a staffed, funded business with active administrative support, maintained record-access systems, available accounting support, bankruptcy counsel, or ordinary corporate infrastructure

52 The schedules, statement of financial affairs, and creditor mailing matrix cannot be accurately prepared from memory or from an assumption that ordinary corporate systems remain active and accessible

53 The issue is not unwillingness The issue is that ECF No 80 imposes a fourteen-day deadline on two non-lawyer individuals to prepare corporate bankruptcy filings for a non-operating corporate debtor without clarification of filing capacity, access to source records, a coordination process, identified forms and format, or professional support

54 That is the continuing procedural impasse

V. THE DEADLINE IS IMMINENT AND THE REMAINING TIME IS NOT ENOUGH

55 ECF No 80 was entered on June 11, 2026

56 Mr LaValley understands that the fourteen-calendar-day deadline imposed by ECF No 80 expires on June 25, 2026

57 Mr LaValley also has a full-time job and is attempting to respond to these bankruptcy obligations pro se, without corporate counsel, without accounting support, and without access to the Debtor's books and records

58 Even if clarification were provided immediately, the remaining time before the apparent Rule 1007 deadline is not sufficient for a pro se individual to accurately prepare and certify corporate Chapter 7 schedules, a statement of financial affairs, and a creditor mailing matrix for a non-operating corporate debtor under penalty of perjury

59 The Debtor ceased operations over six months ago

60 Since then, access to records, personnel, accounting systems, payroll systems, bank information, tax information, legal files, operational systems, vendor records, and third-party custodians has become fragmented, unavailable, or dependent upon records held or obtainable by the Trustee or third parties

61 The unresolved procedural capacity in which Mr LaValley is being required to act makes an accurate, complete, and unqualified filing impossible by the current deadline

62 The issue is not unwillingness

63 The issue is practical impossibility, lack of access to records, lack of procedural clarity, lack of professional support, lack of coordination with the other designated person, and the risk of certifying corporate information that cannot be verified

VI. CONTINUING IMPASSE REGARDING CORPORATE REPRESENTATION

64 The Debtor is a corporation

65 Mr LaValley is not counsel for the Debtor

66 Mr LaValley is not an attorney

67 Mr LaValley is not a bankruptcy attorney

68 Mr LaValley is not an accountant, bookkeeper, tax professional, claims professional, or bankruptcy professional

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

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

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

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

73 Nor does Mr LaValley want a filing submitted in good faith to be treated as a judicial admission by the corporate Debtor, a waiver of rights belonging to the Debtor, a waiver of rights belonging to the estate, or an unqualified certification of corporate records that he does not have access to and cannot verify

74 Mr LaValley therefore respectfully renews his request that the Court or Trustee clarify exactly how Mr LaValley is expected to comply

75 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 that Mr LaValley is not corporate counsel and is not an attorney

76 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

77 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

VII. PROCEDURAL CLARIFICATION AND PROTECTION ARE NECESSARY

78 The need for clarification and procedural protection arises from the posture created by ECF No 80

79 Mr LaValley has been designated as a person required to act on behalf of a corporate Debtor, but he is not an attorney, is not corporate counsel, is not bankruptcy counsel, is not an accountant, and is not a retained professional for the Debtor

80 Mr LaValley understands ECF No 80 to require cooperation and factual assistance in connection with the Debtor's bankruptcy obligations

81 Mr LaValley does not understand ECF No 80 to authorize him to act as legal counsel for the Debtor, make legal determinations for the Debtor, create corporate legal positions, waive rights of the Debtor or estate, certify unavailable corporate records, or expose himself to personal litigation risk without appropriate procedural protection

82 This distinction is critical because the continued § 341 examination and related filings have moved beyond routine factual information gathering

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

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

85 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

86 Under these circumstances, Mr LaValley respectfully submits that procedural protections are necessary before he is required to continue in a posture where he is simultaneously being ordered to act for an unrepresented corporate Debtor and being questioned by creditor counsel in a manner that may develop claims against him personally

87 Mr LaValley is willing to answer factual questions truthfully based on personal knowledge and presently available information

88 But he should not be required to act as the Debtor's legal representative, accountant, records-certification professional, or source of corporate litigation admissions while the Debtor remains unrepresented, while source records remain unavailable, and while creditor counsel advances theories that may later be used against him personally

VIII. RECORDS ARE NECESSARY TO SUPPORT COMPLIANCE

89 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

90 Those filings cannot be accurately prepared from memory

91 Mr LaValley does not presently have access to the Debtor's books and records, accounting systems, payroll systems, bank records, tax records, vendor records, financial systems, asset records, corporate records, legal files, or other materials necessary to prepare the Debtor's schedules, statement of financial affairs, and creditor mailing matrix

92 This is not a matter of merely supplementing incomplete records

93 Mr LaValley lacks access to the source records necessary to prepare and verify the required filings in the first instance

94 This problem is compounded because over six months have passed since Cartwheel ceased operations and the company stopped operating as a functioning business

95 After Cartwheel ceased operations and assets were assigned or surrendered to the secured creditor/landlord, Cartwheel no longer operated as a staffed, funded, functioning business environment with maintained accounting systems, payroll systems, cloud services, paid software subscriptions, administrative accounts, or institutional record-access processes

96 Mr LaValley cannot presently verify which records remain accessible, which subscriptions or systems remain active, which files are retained by third parties, which records are archived, and which materials are unavailable without vendor support, renewed subscriptions, third-party authorization, subpoena, or Trustee assistance

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

98 That distinction matters

99 Mr LaValley cannot truthfully certify corporate schedules, accounting information, payroll information, creditor information, transfer information, or asset information without source records, professional assistance, and access to the Debtor's available source records sufficient to prepare and verify the required filings

100 By way of example, before the continued § 341 meeting, Mr LaValley requested access to subpoenaed bank records so that he could prepare for questioning concerning the Debtor's financial history, accounts, transfers, payments, and related matters

101 The Trustee did not respond to that request

102 Mr LaValley did not receive the subpoenaed bank records before the continued § 341 meeting

103 Those same bank records are also directly relevant to preparation of the Debtor's schedules, statement of financial affairs, and creditor mailing matrix

104 Bank records are among the core source documents necessary to identify accounts, transfers, payments, creditors, insider transactions, deposits, balances, and other financial information required by the bankruptcy forms

105 Mr LaValley cannot be expected to prepare or certify complete corporate financial information under penalty of perjury while relevant subpoenaed bank records remain unavailable to him

106 The problem is not merely that records may exist somewhere

107 The problem is that records necessary to prepare accurate schedules and statements may be in the possession, custody, control, or reach of the Trustee or third parties, while Mr LaValley is being ordered to certify the Debtor's financial information without access to those records

108 That is not a workable compliance process

109 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 available to the Trustee or obtainable through subpoena or third-party production

110 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, asset custodians, or other third-party custodians

111 This request includes any bank records, subpoenaed bank records, account statements, transaction histories, cancelled checks, wire records, ACH records, deposit records, and related financial documents obtained by, requested by, or available to the Trustee

112 Mr LaValley previously requested access to subpoenaed bank records before the continued § 341 meeting

113 The Trustee did not respond to that request, and Mr LaValley did not receive the records

114 To the extent the Trustee has obtained or subpoenaed bank records relevant to the Debtor's financial history, those records should be made available before Mr LaValley is required to prepare or certify schedules and statements that depend on that information

115 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

116 If records no longer exist, are unavailable, have not been maintained, are held by third parties, are in systems no longer available to the Debtor, or cannot be accessed without vendor support, renewed subscriptions, third-party authorization, or Trustee assistance, Mr LaValley requests clarification that he may identify those limitations rather than attempt to reconstruct or certify unavailable records

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

117 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

118 Mr LaValley is not a bankruptcy attorney or bankruptcy professional

119 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

120 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 or present access

X. REPEATED UNANSWERED REQUESTS HAVE CONTRIBUTED TO THE IMPASSE

121 Repeated unanswered requests have contributed to the continuing impasse

122 Mr LaValley has attempted to raise specific procedural and record-access issues necessary to comply with the Court's orders and prepare for bankruptcy-related questioning

123 Those issues include, without limitation, the unresolved procedural issues identified in ECF No 84, the need for clarification regarding how a non-lawyer may comply with ECF No 80 without acting as corporate counsel, the need for access to subpoenaed bank records before the continued § 341 meeting, and the need for a workable process by which both designated individuals may coordinate preparation of the Debtor's schedules and statements

124 Mr LaValley has not received responses to those requests and issues

125 With respect to the subpoenaed bank records, the Trustee did not respond to Mr LaValley's request and the records were not provided before the continued § 341 meeting

126 With respect to ECF No 84, more than one week has passed and Mr LaValley has not received any response or guidance regarding how he is expected to comply with ECF No 80 before the June 25, 2026 deadline

127 This pattern matters because the unresolved issues are not peripheral

128 They go directly to whether Mr LaValley can lawfully, accurately, and safely comply with the obligations imposed by ECF No 80

129 The absence of responses, records, instructions, and a coordination process should not be converted into evidence of noncompliance by Mr LaValley

XI. PROFESSIONAL SUPPORT AND PROCEDURAL PROTECTIONS ARE REQUIRED

130 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

131 Mr LaValley cannot serve as corporate counsel for the Debtor because he is not an attorney

132 Nor can he be required to perform legal, accounting, bankruptcy, tax, claims-classification, or record-certification functions that ordinarily require counsel, accountants, or other retained professionals

133 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

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

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

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

137 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

138 This creates a fundamental unfairness

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

140 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

141 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, records, professional support, or procedural protections, thereby risking personal exposure, or declining to proceed and risking an accusation of noncompliance with the Court's Order

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

143 But he cannot safely or fairly act as the Debtor's 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

144 Mr LaValley should not be required to personally fund the Debtor's legal, accounting, tax, or bankruptcy professionals as a condition of complying with ECF No 80

145 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

146 If questioning remains limited to factual matters within Mr LaValley's personal knowledge or present access, Mr LaValley will continue to cooperate in good faith

147 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

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

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

XII. THE ABSENCE OF GUIDANCE SHOULD NOT BECOME EVIDENCE OF NONCOMPLIANCE

150 Without clarification and an extension, ECF No 80 places Mr LaValley in an impossible position

151 He must either file incomplete and potentially misleading corporate schedules without records, counsel, professional support, or coordination with the other designated person, or decline to do so and risk being characterized as noncompliant

152 That is not a workable compliance mechanism

153 It is the precise procedural impasse Mr LaValley identified in ECF No 84, now made urgent by the Trustee's silence and the approaching June 25, 2026 deadline

154 The Court should not permit the absence of guidance to become evidence of noncompliance

155 Mr LaValley raised the impasse promptly

156 The deadline is now imminent

157 The Trustee has not provided a workable mechanism for compliance, has not responded to Mr LaValley's request for subpoenaed bank records, and has not responded to ECF No 84 or otherwise provided guidance regarding how Mr LaValley is expected to comply with ECF No 80

158 The Court should not permit unanswered requests for guidance, unanswered requests for records, and the absence of a workable coordination process to become the basis for alleging refusal, obstruction, bad faith, or willful noncompliance

159 Under these circumstances, any failure to file complete, unqualified corporate schedules by June 25, 2026 should not be treated as refusal, obstruction, bad faith, or willful noncompliance

160 Mr LaValley respectfully submits that if the Court intends for him to file schedules based only on personal knowledge and presently available records, the Court should expressly permit a limited, qualified, and preliminary filing using "Unknown," "Unavailable," "Disputed," "Subject to Amendment," or similar limitations where appropriate

161 Mr LaValley also respectfully requests confirmation that any such limited filing will not constitute a certification of complete corporate records, a waiver of rights, a judicial admission by the Debtor, or an admission by Mr LaValley personally

XIII. REQUEST FOR EXTENSION

162 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 all of 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 and is not an attorney,

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, tax agencies, prior counsel, corporate counsel, payroll providers, cloud-service providers, former employees, technical custodians, asset custodians, or other custodians,

d the Trustee provides access to any subpoenaed bank records, account statements, transaction histories, cancelled checks, wire records, ACH records, deposit records, and related financial documents obtained by, requested by, or available to the Trustee,

e 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,

f the filed periods of unavailability are accounted for,

g both designated individuals receive direct notice and clear instructions regarding their respective responsibilities, coordination process, and limitations,

h appropriate professional support is made available, and

i the Court clarifies whether any interim filing may be expressly preliminary, limited, qualified, and subject to amendment

163 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

164 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

XIV. CONCLUSION

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

166 Mr LaValley seeks clarification of the procedural mechanism necessary to comply

167 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, that Mr LaValley is not counsel for the Debtor, and that Mr LaValley is not an attorney

168 The current posture also requires two designated individuals to act, yet Mr LaValley cannot compel the participation of Ms Conway, cannot certify information on her behalf, and is not aware of any direct process established by the Trustee for both designated persons to coordinate compliance before the June 25, 2026 deadline

169 Over six months have passed since Cartwheel ceased operations

170 Cartwheel is not presently operating as a staffed, funded business with active administrative support, maintained record-access systems, available accounting support, bankruptcy counsel, or ordinary corporate infrastructure

171 Mr LaValley does not presently have access to the source records necessary to prepare, verify, and certify complete bankruptcy schedules and statements

172 Mr LaValley respectfully submits that he cannot be required to reconstruct over-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 a role he is not licensed, authorized, funded, or professionally qualified to perform

173 The Court should not permit the approaching deadline to convert an unresolved procedural impasse into an accusation of noncompliance

174 Mr LaValley raised the impasse promptly

175 The impasse remains unresolved

176 The deadline is now imminent

177 The Trustee has not provided a workable mechanism for compliance, has not responded to Mr LaValley's request for subpoenaed bank records, and has not responded to ECF No 84 or otherwise provided guidance regarding how Mr LaValley is expected to comply with ECF No 80

178 Mr LaValley therefore 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

179 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 provides access to subpoenaed bank records, the Trustee identifies the exact required forms and format, the noticed unavailability period is accounted for, both designated individuals receive direct notice and clear instructions, and appropriate professional support is made available

180 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

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

1 clarifying the scope and capacity of Mr LaValley’s obligations under ECF No 80,

2 clarifying that Mr LaValley is not being required to act as corporate counsel, legal representative, accountant, tax professional, bankruptcy professional, claims-classification professional, or records-certification professional for the Debtor,

3 clarifying whether any filings submitted by Mr LaValley pursuant to ECF No 80 will be accepted as filings made by a Court-designated individual under Federal Rule of Bankruptcy Procedure 9001(b)(5),

4 extending the June 25, 2026 deadline to file the Debtor’s schedules, statement of financial affairs, and creditor mailing matrix,

5 permitting any interim filing to be preliminary, qualified, limited to personal knowledge and reasonably available records, and subject to amendment,

6 authorizing use of “Unknown,” “Unavailable,” “Disputed,” “Subject to Amendment,” or similar limitations where information is unavailable, incomplete, disputed, outside Mr LaValley’s personal knowledge, or cannot be professionally verified,

7 directing or authorizing the Trustee to obtain, provide access to, or identify necessary records from third-party custodians,

8 directing the Trustee to provide access to subpoenaed bank records, account statements, transaction histories, cancelled checks, wire records, ACH records, deposit records, and related financial documents obtained by, requested by, or available to the Trustee,

9 requiring that both designated individuals receive direct notice and clear instructions regarding their respective obligations and coordination process,

10 making appropriate professional support available,

11 imposing appropriate procedural protections if questioning or required filings move beyond factual matters within Mr LaValley's personal knowledge and present access, including limitations or conditions necessary to avoid unfair prejudice while the corporate Debtor remains unrepresented, and

12 granting such other and further relief as the Court deems just and proper

Dated June 23, 2026

Respectfully submitted,

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

lavalley scott@gmail com