UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re
CARTWHEEL ROBOTICS, INC ,
Debtor

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

MOTION FOR STATUS CONFERENCE AND REQUEST FOR RULING ON PENDING PROCEDURAL IMPASSE, JULY 10 CONTINUED § 341 ISSUES, THIRD-PARTY RECORDS, RULE 2004 MATTERS, CLAIMS-REGISTER POSTURE, AND ESTATE-ADMINISTRATION PATH FORWARD

Scott LaValley, appearing pro se individually, as a secured creditor and party in interest, respectfully submits this Motion for Status Conference and Request for Ruling on Pending Procedural Impasse, July 10 Continued § 341 Issues, Third-Party Records, Rule 2004 Matters, Claims-Register Posture, and Estate-Administration Path Forward

Mr LaValley submits this Motion on his own behalf He does not purport to appear as counsel for the Debtor, does not purport to represent the Debtor, and does not purport to speak for Samantha Conway

This Motion does not ask the Court to decide the merits of any underlying claim, avoidance issue, governance issue, fiduciary-duty issue, malpractice issue, insurance-coverage issue, document-integrity issue, claim-objection issue, equitable-subordination issue, bad-faith issue, or potential civil claim at this time

It asks the Court to address the procedural impasse that now exists and to establish a practical path forward before the July 10, 2026 continued § 341 meeting proceeds

The need for Court guidance is now urgent because the 14-day deadline in ECF No 80 has already passed Mr LaValley timely identified an impasse and inability to comply, including lack of possession, custody, control, access, funding, Debtor's counsel, accounting support, and complete corporate records The Court should therefore address the consequences of the expired deadline, clarify that no sanctions, contempt finding, adverse inference, waiver, or other prejudice should arise while the impasse remains unresolved, and establish a prospective procedure for any further schedule-related obligation

Mr LaValley does not believe it is fair, reliable, or procedurally appropriate for the July 10 continued § 341 meeting to proceed while the Debtor remains unrepresented, while the Court-designated individuals lack access to complete corporate records and professional support, while Ms Conway has filed notice that she cannot meaningfully participate during the July 10 period, and while unresolved Rule 2004, record-custody, document-integrity, claims-register, and estate-administration issues remain pending

Mr LaValley is not willing to provide unsupported corporate testimony, reconstructed schedules, accounting conclusions, legal conclusions, or document certifications under oath in the absence of debtor representation, complete records, professional support, and Court guidance

Mr LaValley and Ms Conway have together filed claims totaling $539,770 Based on Mr LaValley's review of the claims register as of the filing of this Motion, and subject to any later-filed claims, the Petitioning Creditors do not appear to have filed proofs of claim That posture matters because the parties pressing the estate narrative most aggressively do not appear, as of this filing, to have reduced their asserted debts to claims on the register, while filed creditors' recovery depends on fair administration, accurate records, preservation of evidence, and investigation of the estate issues identified in the pending Rule 2004 filings

This Motion does not ask the Court to substitute Mr LaValley's judgment for the Trustee's business judgment It asks only that the Trustee state the estate-administration path, identify what records and professionals are needed, state whether the July 10 meeting should proceed, and state whether he intends to preserve, investigate, narrow, oppose, defer, or otherwise address the issues already raised in the pending Rule 2004 filings

I. RELIEF REQUESTED

1 Mr LaValley respectfully requests that the Court enter an order, or set a prompt status conference, addressing the following issues

a whether the July 10, 2026 continued § 341 meeting should be continued unless and until the unresolved procedural impasse, debtor-representation issue, record-access issues, professional-support issues, Ms Conway's unavailability and direct-notice issues, pending Rule 2004 issues, claims-register posture, and distinction between personal factual testimony and corporate reconstruction are addressed,

b in the alternative, whether the Court should enter ground rules limiting any July 10 examination to matters within Mr LaValley's personal knowledge and preserving objections to questions seeking corporate reconstruction, legal conclusions, accounting determinations, document certifications, or litigation admissions without debtor counsel, records, professional support, and Court guidance,

c whether Mr LaValley should be granted relief from, clarification of, or modification of ECF No 80 to the extent that order required schedules, statements, or related bankruptcy filings to be prepared and filed by a 14-day deadline that has now passed, and whether no sanctions, contempt finding, adverse inference, waiver, or other prejudice should arise from the expired deadline while the impasse remains unresolved,

d whether the Trustee should file a status report identifying what records have been obtained from Bank of America, Albright & Associates, Ltd , and any other third-party custodians, what records remain missing, whether subpoenaed records will be reviewed and made available for any lawful compliance process, and whether professional assistance is needed to review those records,

e whether, in light of the Trustee's duties under 11 U S C § 704(a)(1) and § 704(a)(4), the Trustee intends to coordinate, support, narrow, oppose, defer, or otherwise address the pending Rule 2004 matters,

f whether the Trustee intends to investigate, preserve, narrow, defer, oppose, or otherwise address the document-integrity, governance, financing, disclosure, insurance, claim-treatment, and potential estate-claim issues identified in the pending Rule 2004 filings, g whether the Trustee intends to investigate or preserve evidence concerning the period before Cartwheel's final collapse when financing, strategic, acquisition, customer, and market-validation paths may still have existed, including communications concerning disputed governance rights, investor-control issues, demand communications, financing diligence, strategic alternatives, and potential estate claims,

h how the claims-register posture, including the substantial filed creditor claims of Mr LaValley and Ms Conway and the apparent absence, as of this filing, of filed proofs of claim by Petitioning Creditors, affects the appropriate estate-administration path, Rule 2004 discovery, claim-treatment issues, and July 10 continued § 341 process, and

i what immediate steps are required to avoid continued uncertainty, unnecessary burden, and one-sided development of the record

2 At minimum, Mr LaValley, as a creditor and party in interest, requests that the Court set a prompt status conference and direct the Trustee to file a status report addressing (i) what records have been obtained from Bank of America, Albright & Associates, Ltd , and any other third-party custodians, (ii) what records remain missing, (iii) whether subpoenaed records will be reviewed and made available for any lawful compliance process, (iv) whether professional assistance is needed to review those records, (v) whether the July 10 continued § 341 meeting should proceed, be continued, or proceed only with ground rules, and (vi) whether, in light of the Trustee's duties under 11 U S C § 704(a)(1) and § 704(a)(4), the Trustee intends to coordinate, support, narrow, oppose, defer, or otherwise address the pending Rule 2004 matters

3 Mr LaValley also requests such other and further relief as the Court deems just and proper

II. PROCEDURAL BACKGROUND

4 This is an involuntary Chapter 7 case Cartwheel Robotics, Inc did not voluntarily seek bankruptcy relief

5 On June 11, 2026, the Court entered ECF No 80, designating Mr LaValley and Samantha Conway as persons required to act on behalf of the Debtor under Federal Rule of Bankruptcy Procedure 9001(b)(5)

6 ECF No 80 requires Mr LaValley and Ms Conway to prepare and file bankruptcy schedules, a statement of financial affairs, and a creditor mailing matrix ECF No 80 also addresses appearance and testimony issues relating to continued § 341 meetings and Rule

2004 proceedings Mr LaValley does not waive, and expressly reserves, all rights and objections concerning scope, notice, capacity, representation, access to records, personal versus corporate testimony, document certification, legal conclusions, accounting conclusions, and the unresolved procedural issues raised in ECF Nos 84, 91, and this Motion

7 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

8 ECF No 84 explained that Mr LaValley was not refusing to comply Rather, he sought a lawful, accurate, and procedurally proper mechanism for compliance without engaging in unauthorized corporate representation, without making legal admissions on behalf of the Debtor, and without certifying corporate records that he did not possess, control, or have access to

9 On June 23, 2026, Mr LaValley filed ECF No 91, his 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

10 The impasse remains unresolved

11 Because the 14-day deadline in ECF No 80 has already passed, the issue is no longer merely prospective scheduling

12 Mr LaValley does not seek to ignore the Court's order Before the deadline expired, he identified an impasse and explained why compliance was not possible under the existing conditions

13 Those conditions included lack of possession, custody, or control over complete corporate records, lack of access to many relevant records and systems, lack of Debtor's counsel, lack of accounting or bankruptcy professional support, lack of estate funding, and unresolved questions concerning who is authorized, able, and protected when preparing and certifying corporate bankruptcy filings

14 The Court should address the consequences of the missed deadline, the unresolved impasse, and the conditions under which any further schedule-related obligation may fairly proceed

15 Mr LaValley respectfully requests that the Court clarify that no sanctions, contempt finding, adverse inference, waiver, or other prejudice should arise from the expired deadline while the impasse remains unresolved, and either suspend or modify the schedule-production obligation or establish a prospective procedure for any required schedules, statements, or creditor-matrix filings

16 The record also includes noticed availability limitations affecting the designated individuals

17 Mr LaValley filed ECF No 66, his Notice of Unavailability, stating that he would be unavailable from June 15, 2026 through June 27, 2026, and again from July 20, 2026 through August 1, 2026

18 Ms Conway filed ECF No 92, her Notice Regarding Lack of Direct Notice, Unavailability, and Reservation of Rights, stating that she has longstanding travel commitments from July 5, 2026 through August 10, 2026, that she will be traveling through areas with limited or unreliable internet and cellular service, and that she cannot reasonably be expected to attend hearings, participate in examinations or meetings, prepare filings, respond to case-related requests, or otherwise meaningfully participate in matters relating to this case during that period

19 Mr LaValley does not purport to speak for Ms Conway and does not seek relief on her behalf He raises Ms Conway's notice because ECF No 80 imposes duties on both designated individuals, and the absence or unavailability of one designated individual directly affects any process requiring coordinated corporate record reconstruction, schedule preparation, statement preparation, creditor-matrix preparation, § 341 testimony, or Rule 2004 testimony

20 Three Rule 2004 filings remain pending or unresolved before this Court

a ECF No 63, Mr LaValley's Motion for Rule 2004 document production,

b ECF No 88, Mr LaValley's Supplement to Motion for Rule 2004 Examination, and

c ECF No 90, Ms Conway's Motion for Rule 2004 Examination and Document Production

21 Those filings seek discovery into estate-related issues including prepetition asset value, Engineered Arts, Gene Wong / RSF, Nevada Battle Born Growth Escalator, Inc , the Wong Family Revocable Trust, prior corporate counsel Craig Macy, disputed governance rights, document-integrity issues, potential acquisition or financing paths, creditor coordination, and the circumstances surrounding the involuntary petition

22 ECF No 90 is significant because it was filed independently by Ms Conway, pro se and on her own behalf, as a separate creditor, shareholder, former officer, and party in interest with firsthand knowledge of Cartwheel's operations, governance, financing, and collapse

III. THE TRUSTEE HAS ALREADY SUBPOENAED THIRD-PARTY RECORDS CENTRAL TO THE IMPASSE

23 The Trustee has already exercised estate authority to subpoena third-party records central to any schedule, statement, or financial reconstruction process

24 On May 4, 2026, Trustee's counsel filed ECF No 60, a Notice of Subpoena to Bank of America, N A , seeking account statements, signature cards, account applications, correspondence, wire-transfer materials, checks, deposit slips, and online or interbank transfer information for Cartwheel accounts from January 1, 2024 to the present

25 On June 25, 2026, the Trustee filed ECF No 93, a Notice of Subpoena to the Custodian of Records for Albright & Associates, Ltd , seeking tax returns, financial statements, bank statements, QuickBooks files, accounting backups, general ledgers, working papers, bookkeeping records, engagement letters, correspondence, billing records, and invoices from January 1, 2022 to the present

26 Those subpoenas confirm the core problem raised in ECF Nos 84 and 91 material corporate financial and accounting records are not simply available to Mr LaValley and must be obtained, reviewed, and used through an estate-authorized third-party process

27 Mr LaValley cannot be expected to recreate, certify, or testify as to complete corporate financial information from memory while the Trustee is obtaining the source records from Bank of America, Albright & Associates, and any other third-party custodians

28 This is not a refusal to cooperate It is a practical and accuracy-based limitation

29 The Trustee's subpoenas confirm that a Trustee-led third-party record process is necessary before anyone can fairly expect complete corporate schedules, statements, accounting testimony, or document certifications

30 Mr LaValley can truthfully answer questions based on personal knowledge He can identify known custodians He can explain what he knows and does not know He can cooperate with a Trustee-led process to obtain records from third parties

31 He cannot honestly certify reconstructed corporate schedules as complete and accurate if the necessary records are unavailable, inaccessible, incomplete, outside his control, or if any reconstructed schedules are not prepared, reviewed, or supported by appropriate accounting, bookkeeping, bankruptcy, or other professional assistance

IV. THE JULY 10 CONTINUED § 341 MEETING SHOULD BE CONTINUED OR LIMITED

32 The July 10 continued § 341 meeting should not proceed as though the unresolved impasse does not exist

33 Proceeding with another continued § 341 examination without addressing the impasse risks repeating the same structural problem former personnel are being questioned or pressed for corporate information without debtor representation, without complete records, without professional support, without a defined record-access protocol, and without a Court-directed process for distinguishing personal factual testimony from corporate reconstruction, legal conclusions, accounting determinations, document certifications, or litigation admissions

34 That problem is especially acute now because the Trustee has already subpoenaed the very third-party records needed to evaluate the Debtor's financial condition, schedules, statements, and accounting records

35 It is also acute because ECF No 80 designated both Mr LaValley and Ms Conway, while Ms Conway has filed ECF No 92 stating that she cannot meaningfully participate during the July 10 period

36 Mr LaValley does not seek to avoid truthful testimony However, absent Court guidance, Mr LaValley does not believe the July 10 continued § 341 meeting can fairly proceed as though the unresolved procedural impasse does not exist

37 Mr LaValley therefore requests that the Court continue the July 10, 2026 continued § 341 meeting unless and until the Court addresses the unresolved impasse, or alternatively enters ground rules limiting any examination to matters within Mr LaValley's personal knowledge and preserving objections to questions seeking corporate reconstruction, legal conclusions, accounting determinations, document certifications, or litigation admissions without debtor counsel, records, professional support, or estate-authorized access to third-party records

V. THE CLAIMS-REGISTER POSTURE SUPPORTS A MORE BALANCED PROCESS

38 Mr LaValley and Ms Conway have filed creditor claims totaling $539,770, including unpaid-compensation components and any asserted secured, priority, lien, or other claim-treatment rights stated in their filed proofs of claim

39 Based on Mr LaValley's review of the claims register as of the filing of this Motion, and subject to any later-filed claims, the Petitioning Creditors do not appear to have filed proofs of claim

40 That contrast matters The Petitioning Creditors commenced this involuntary case and have driven much of the adversarial narrative, but do not appear, as of this filing, to have reduced their asserted debts to filed claims on the claims register Meanwhile, Mr LaValley and Ms Conway have filed substantial creditor claims and remain directly affected by whether the estate fairly investigates value loss, estate property, insurance coverage, document-integrity issues, and potential estate claims

41 The Court need not decide claim priority, claim validity, or claim treatment through this Motion But the Court should recognize that the current procedural posture risks allowing non-claim-filing Petitioning Creditors to shape the case narrative while filed creditors' recovery depends on a broader and more balanced estate investigation

42 This is not only a personal issue for Mr LaValley and Ms Conway Other non-petitioning creditors who filed claims also depend on a neutral, complete, and record-based estate process rather than a one-sided narrative shaped by parties who commenced the involuntary case but have not yet filed proofs of claim

43 If Petitioning Creditors, Gene Wong, RSF, BBG, or related parties later file claims, their claim treatment may depend on facts that are not yet developed

44 If they do not file claims, that fact may bear on whether this case is functioning as an ordinary collective-creditor process or as a continuation of a prepetition investor-control dispute

VI. PENDING RULE 2004, TRUSTEE DUTIES, AND ESTATE-PRESERVATION ISSUES SHOULD NOT BE LOST

45 Rule 2004 issues remain important because the estate cannot fairly evaluate value loss, records custody, asset issues, insurance coverage, document-integrity issues, or potential claims without discovery

46 These issues also overlap with the Trustee's statutory duties Under 11 U S C § 704(a)(1), a Chapter 7 trustee is charged with collecting and reducing to money property of the estate and closing the estate as expeditiously as is compatible with the best interests of parties in interest Under 11 U S C § 704(a)(4), the Trustee is charged with investigating the financial affairs of the Debtor The pending Rule 2004 filings raise issues that may affect estate administration, including financial affairs, asset disposition, records custody, document integrity, insurance coverage, claim treatment, and potential estate claims

47 Rule 2004 also permits examination into the debtor's acts, conduct, property, liabilities, financial condition, and any matter that may affect administration of the estate The pending Rule 2004 filings therefore concern matters within the ordinary scope of bankruptcy estate investigation

48 The Trustee need not accept Mr LaValley's conclusions, but the estate-administration path should state whether these docketed issues will be investigated, preserved, deferred, opposed, narrowed, or abandoned

49 To Mr LaValley's knowledge, no party has filed a substantive opposition addressing the Rule 2004 discovery requested in ECF Nos 63, 88, and 90, and no ruling has been entered resolving those Rule 2004 matters

50 The procedural-impasse filings at ECF Nos 84 and 91 also remain unresolved

51 The result is that multiple unrebutted requests for discovery, clarification, record access, professional support, and estate-administration direction remain pending while the July 10 continued § 341 meeting approaches

52 The case should not proceed only on a final-month collapse narrative The pending Rule 2004 filings and related record identify broader estate issues involving live pre-collapse financing and strategic-validation paths, the August 5, 2024 A&R COI filing, the October 14, 2025 COI correction, the November 6, 2025 RSF demand letter, insurance coverage, document integrity, governance, financing, disclosure, claim treatment, and potential estate claims

53 Those issues are especially important because the record already identifies a narrow pre-collapse window in which Cartwheel still had active financing, strategic, customer, and market-validation paths, while disputed governance rights, investor-control issues, and demand communications were simultaneously affecting diligence, investor confidence, and value-preservation options

54 The pending Rule 2004 filings also identify document-integrity, governance, financing, and disclosure issues that may affect estate administration, claim treatment, insurance coverage, and potential estate or non-estate claims This Motion does not ask the Court to decide those issues It asks only that they not be bypassed before the Trustee states whether and how they will be investigated, preserved, narrowed, deferred, opposed, or otherwise addressed

55 Nothing in this Motion concedes that any personal claim held by Mr LaValley, Ms Conway, or any other non-debtor creditor is property of the estate Mr LaValley expressly reserves all rights to assert that any personal claims arising from prepetition conduct, including claims against investors, prior counsel, Petitioning Creditors, or other third parties, belong to him personally and are not estate claims

56 Mr LaValley does not seek through this Motion to adjudicate any personal civil claim, professional-liability claim, securities claim, fiduciary-duty claim, tort claim, document-integrity issue, governance issue, financing issue, or disclosure issue He seeks only to ensure that the Trustee and Court identify a practical estate-administration path before another continued § 341 meeting proceeds on an incomplete record

VII. REQUESTED ORDER

57 Mr LaValley respectfully requests that the Court enter an order providing one or more of the following forms of relief

a setting a prompt status conference,

b directing the Trustee to file a status report or statement of position addressing the procedural impasse, records obtained, records remaining, third-party custodians, professional-assistance needs, July 10 continued § 341 issues, claims-register posture, pending Rule 2004 matters, preservation issues, and proposed estate-administration path, c directing the Trustee to identify what records have been obtained from Bank of America, Albright & Associates, Ltd , and any other third-party custodians, what records remain missing, and whether those records will be reviewed and made available for any lawful compliance process,

d granting relief from, clarification of, or modification of ECF No 80 to the extent that order required schedules, statements, or related bankruptcy filings to be prepared and filed by a 14-day deadline that has now passed,

e determining that Mr LaValley's timely impasse filings preserved the issue and that no sanctions, contempt finding, adverse inference, waiver, or other prejudice should arise from the expired schedule deadline while the impasse remains unresolved,

f suspending or modifying any further schedule-production obligation unless and until the Court determines who is authorized to prepare and sign the filings, what records will be used, how record access will be provided, whether estate funding or professional support will be available, and what protections apply to any designated person asked to verify corporate information,

g clarifying that Mr LaValley is not required to reconstruct, certify, or verify corporate schedules, statements, or creditor-matrix information based on records outside his personal knowledge or outside his possession, custody, or control,

h directing that the July 10, 2026 continued § 341 meeting be continued unless and until the unresolved procedural impasse, debtor-representation issue, record-access issues, professional-support issues, Ms Conway's direct-notice and unavailability issues, pending Rule 2004 issues, claims-register posture, and distinction between personal factual testimony and corporate reconstruction are addressed,

i in the alternative, entering ground rules limiting any examination to matters within Mr LaValley's personal knowledge and preserving objections to questions seeking corporate reconstruction, legal conclusions, accounting determinations, document certifications, or litigation admissions without debtor counsel, records, professional support, and Court guidance,

j directing the Trustee to state whether, in light of his duties under 11 U S C § 704(a)(1) and § 704(a)(4), he intends to coordinate, support, narrow, oppose, defer, or otherwise address the pending Rule 2004 matters,

k directing the Trustee to state whether he intends to investigate or preserve evidence concerning the period before Cartwheel's final collapse when financing, strategic, acquisition, customer, and market-validation paths may still have existed, including communications concerning disputed governance rights, investor-control issues, demand communications, financing diligence, strategic alternatives, and potential estate claims,

l directing the Trustee to state whether he intends to seek authority to retain, or otherwise use, appropriate accounting, bookkeeping, forensic accounting, bankruptcy, or records professionals necessary to review records, prepare or evaluate schedules and statements, analyze claims, evaluate insurance, or evaluate potential estate claims,

m directing the Trustee to state whether he intends to investigate, preserve, narrow, defer, oppose, or otherwise address the document-integrity, governance, financing, disclosure, insurance, claim-treatment, and potential estate-claim issues identified in the pending Rule 2004 filings,

n directing the Trustee to address how the claims-register posture, including the substantial filed creditor claims of Mr LaValley and Ms Conway and the apparent absence, as of this filing, of filed proofs of claim by Petitioning Creditors, affects the appropriate estate-administration path, Rule 2004 discovery, claim-treatment issues, and July 10 continued § 341 process,

o preserving, without deciding and without prejudice to any party's rights, potential claim-objection, disallowance, offset, recoupment, and equitable-subordination issues relating to any claims filed or asserted by Gene Wong, RSF, BBG, Petitioning Creditors, or related parties, and

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

VIII. CONCLUSION

58 This case is at a procedural impasse

59 Mr LaValley cannot prepare accurate corporate bankruptcy schedules and statements, or provide unsupported corporate reconstruction testimony, without possession, custody, control, access, funding, accounting support, bankruptcy-professional assistance, debtor representation, and estate authority to obtain and review records from third-party custodians

60 The Trustee's own subpoenas to Bank of America and Albright & Associates confirm that material corporate financial and accounting records are not simply available to Mr LaValley and must be obtained, reviewed, and used through an estate-authorized process

61 The July 10, 2026 continued § 341 meeting makes these issues urgent The examination should not proceed as though the unresolved impasse, debtor-representation issue,

pending Rule 2004 matters, unavailability issues, direct-notice issues, third-party record issues, claims-register posture, and professional-support issues do not exist

62 The case should not proceed through another continued § 341 meeting as though the only relevant story is the final-month collapse The Court should first establish a practical estate-administration path that addresses records, professional support, Rule 2004 discovery, document integrity, claims-register posture, insurance, and the distinction between personal factual testimony and unsupported corporate reconstruction

63 The requested status conference would not decide the merits of any disputed issue, it would simply establish whether this case will proceed through a Trustee-led record and preservation process, or whether former personnel will continue to be pressed for unsupported corporate reconstruction before the relevant third-party records are obtained and reviewed

64 This is particularly important because the pending Rule 2004 filings concern matters that may affect estate administration and overlap with the Trustee's statutory duties to investigate the Debtor's financial affairs and administer estate property for the benefit of parties in interest

65 Mr LaValley respectfully requests that the Court set a prompt status conference, require the Trustee to state his position and proposed path forward, rule on or schedule the pending Rule 2004 matters, continue the July 10 continued § 341 meeting or enter appropriate ground rules, address the third-party record and professional-assistance issues, account for the claims-register posture, and establish a practical estate-administration path that does not require unsupported lay reconstruction of corporate records

Dated July 6, 2026

Respectfully submitted,

Scott LaValley
Scott LaValley, Pro Se
Individually, as Secured Creditor and Party in Interest
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