

HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240
Las Vegas, NV 89148
Telephone: 702/720-3370
Facsimile: 702/720-3371
Counsel for Bradley G. Sims, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:
CARTWHEEL ROBOTICS, INC.,
Debtor.

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

RESPONSE TO: (1) MOTION OF SECURED CREDITOR SCOTT LAVALLEY FOR PRODUCTION OF DOCUMENTS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 [ECF NO. 63]; AND (2) MOTION FOR RULE 2004 EXAMINATION AND DOCUMENT PRODUCTION REGARDING GOVERNANCE, INVESTOR CONTROL, COUNSEL CONFLICTS, STRATEGIC TRANSACTIONS, AND POTENTIAL LOSS OF ESTATE VALUE [ECF NO. 90]

Date of Hearing: October 6, 2026
Time of Hearing: 1:30 p.m.

Place: Telephonic Hearing
Phone Conference Number: (833) 435-1820
Meeting ID: 160 532 0260
Access Code: 643758#

Judge: Honorable Hilary L. Barnes

Bradley G. Sims (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, by and through his counsel, Jacob L. Houmand, Esq. of the Houmand Law Firm, Ltd., hereby submits this *Response to: (1) Motion of Secured Creditor Scott LaValley for Production of Documents Pursuant to Federal Rule of Bankruptcy Procedure 2004 [ECF No.*

63]; and (2) Motion for Rule 2004 Examination and Document Production Regarding Governance, Investor Control, Counsel Conflicts, Strategic Transactions, and Potential Loss of Estate Value [ECF No. 90] (the “Response”).¹

The Response is based on the following Memorandum of Points and Authorities, the pleadings and papers on file herein, and any argument that may be entertained at the hearing on the Motion of Secured Creditor Scott LaValley for Production of Documents Pursuant to Federal Rule of Bankruptcy Procedure 2004 [ECF No. 63] (the “LaValley Motion”) or the Motion for Rule 2004 Examination and Document Production Regarding Governance, Investor Control, Counsel Conflicts, Strategic Transactions, and Potential Loss of Estate Value [ECF No. 90] (the “Conway Motion”).²

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

On May 12, 2026, Scott LaValley (“Mr. LaValley”), the former president of Cartwheel Robotics, Inc. (the “Debtor”), filed the LaValley Motion that appears to request the production of documents from various parties, including Gene Wong, Reno Seed Fund/RSF Robotics I, the Wong Family Revocable Trust, Nevada Battle Born Growth Escalator, Inc., Christine Guerci, Karsten Heise, Kyle Ferguson, Nicolas Desmarais, Engineered Arts, and Click Bio. Mr. LaValley did not initially schedule a hearing on the LaValley Motion. The Trustee does not oppose the LaValley Motion because it only seeks discovery from third parties and does not seek any affirmative relief from the Trustee.

...

...

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

² The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-referenced bankruptcy case, including adversary proceedings, pursuant to Federal Rule of Evidence 201, incorporated by reference by FRBP 9017.

On June 22, 2026, Samantha Conway (“Ms. Conway”), the former Chief Operating Officer of the Debtor, filed the Conway Motion that appears to request court approval of an “investigation into four main areas that appear to have materially contributed to the destruction of enterprise value prior to the involuntary petition”. *See* Conway Motion, p. 1. Unlike the LaValley Motion, the Conway Motion does not request authority to conduct an examination of a specific entity or person. Instead, it appears to obtain an order from this Court approving a broad investigation that Ms. Conway intends to conduct concerning the Debtor’s financial affairs. The Conway Motion further seeks to direct the Trustee to investigate certain aspects of the Debtor’s pre-petition affairs.

Section 704(a)(4) states that the Trustee “shall investigate the financial affairs of the debtor”, but this duty does not mean each creditor or party-in-interest gets to dictate the subjects, sequence, or scope of the Trustee’s investigation. The Trustee is actively reviewing the Debtor’s financial affairs and will exercise his business judgment in determining which assets to pursue for the benefit of creditors. While Ms. Conway is entitled to use FRBP 2004 to conduct her own investigation of the Debtor’s financial affairs, she is not entitled to use this rule to compel or direct the Trustee in how he should pursue his statutory obligations.³ Although the Trustee will consider information supplied by creditors and other parties in interest, the Trustee must independently determine the nature and extent of any investigation that is warranted. The Conway Motion improperly blurs that distinction by repeatedly identifying matters that the Trustee purportedly “should investigate” or “should determine,” rather than identifying a particular examination that Ms. Conway herself seeks to conduct.

As a result, the Conway Motion should be denied, without prejudice, because it does not identify a specific entity or person to examine and appears to direct the manner in which the Trustee should administer the Debtor’s bankruptcy case.

...

...

³ The Trustee reserves all rights to review and, if appropriate, object to any proof of claim filed by Ms. Conway in the Debtor’s bankruptcy case.

II. LEGAL ARGUMENT

A. **The Conway Motion Does Not Comply With FRBP 2004**

FRBP 2004 allows a party-in-interest to request an examination of any entity related to the following: (a) the debtor's acts, conduct, or property; (b) the debtor's liabilities and financial condition; (c) any matter that may affect the administration of the debtor's estate; or (d) the debtor's right to a discharge. *See* FED. R. BANKR. P. 2004(a)-(b).

Here, the Conway Motion does not identify a particular entity or person to be examined. Instead, it seeks approval of what Ms. Conway describes as an "investigation into four main areas" and then sets forth numerous factual questions that she contends should be investigated. FRBP 2004 does not authorize a party in interest to obtain a general commission from this Court to investigate the Debtor's affairs, much less an order directing the Trustee to investigate certain issues.

If Ms. Conway believes that a particular person or entity possesses information relevant to the administration of the estate, she may seek a Rule 2004 examination of that person or entity and demonstrate good cause for that specific examination. What she may not do is obtain a blanket order authorizing an undefined series of examinations or requiring the Trustee to pursue the numerous theories identified in her Motion. Ms. Conway remains free to provide information to the Trustee or pursue discovery available to her under FRBP 2004, but the Court should not enter an order that effectively substitutes Ms. Conway's judgment for that of the Trustee. For these reasons, the Conway Motion should be denied, without prejudice.

B. **The Conway Motion Violates Local Rule 9014(e)**

Local Rule 9014(e) limits the length of points and authorities in support of a motion to twenty (20) pages unless this Court orders otherwise:

(1) Unless the court orders otherwise, prehearing and posthearing briefs and points and authorities in support of, or in response to, motions are limited to twenty (20) pages including the motion but excluding exhibits, addendums, tables of contents, tables of authorities, and the case caption. Reply briefs and points and authorities are limited to fifteen (15) pages, excluding exhibits, addendums, tables of contents, tables of authorities, and the case caption. Where the court enters an order permitting a longer brief or

1 points and authorities, the papers must include a table of contents
2 and table of authorities.

3 Here, the Conway Motion is thirty-seven (37) pages, not including the exhibits. Ms.
4 Conway did not seek approval from this Court to file a motion in excess of the page limitation set
5 forth in Local Rule 9014(e). The Conway Motion also does not include a table of contents or
6 table of authorities. This is a clear violation of Local Rule 9014(e) and is an additional basis to
7 deny the Conway Motion.

8 **III. CONCLUSION**

9 For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:
10 (i) denying the Conway Motion without prejudice; and (ii) for such other and further relief as is
11 just and proper.

12 Dated this 22nd day of September, 2026.

13 **HOUMAND LAW FIRM, LTD.**

14 By: /s/ Jacob L. Houmand
15 Jacob L. Houmand, Esq. (NV Bar No. 12781)
16 9205 West Russell Road, Building 3, Suite 240
17 Las Vegas, NV 89148
18 Telephone: 702/720-3370
19 Facsimile: 702/720-3371

20 *Counsel for Bradley G. Sims, Chapter 7 Trustee*
21
22
23
24
25
26
27
28