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Attorneys for Petitioning Creditors and the Wong Parties

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re
CARTWHEEL ROBOTICS INC.,
Alleged Debtor.

Case No.: 26-50278-hlb
Involuntary Chapter 7

**OBJECTION TO NOTICE OF SUBPOENA
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 9016,
FEDERAL RULE OF CIVIL PROCEDURE
45, AND LOCAL RULE 9016(b) ON
EUGENE WONG**

Date of Hearing: N/A
Time of Hearing: N/A

Eugene Wong, individually, as manager of RSF Robotics I, a series of RSF Master LLC (“RSF Robotics I”), and as trustee of the Wong Family Revocable Trust (the “Wong Trust”) (collectively, the “Wong Parties”), hereby object (“Objection”) to the *Notice of Subpoena Pursuant to Federal Rule of Bankruptcy Procedure 9016, Federal Rule of Civil Procedure 45, and Local Rule 9016(b) on Eugene Wong* [ECF No. 102] (“Subpoena”) filed by Scott LaValley (“LaValley”) on September 17, 2026, as follows:

The Wong Parties submit this Objection under Fed. R. of Bank. Proc. 9016 (“Bankruptcy Rule 9016”), which incorporates Fed. R. Civ. Proc. 45.

1. The Wong Parties object to the Subpoena on the ground that it was improperly issued. There is no pending action, contested matter, adversary proceeding, Rule 2004 examination order, or other procedural basis authorizing discovery. Discovery under Bankruptcy Rule 9016 generally must be related to a pending matter.

2. The Wong Parties further object to the Subpoena under Fed. R. Civ. Proc. 45(d)(2)(B) because the Subpoena imposes undue burden and expense on the Wong Parties in violation of Fed. R. Civ. Proc. 45(d)(1) (requiring the party issuing a Rule 45 subpoena to “take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena”). The Subpoena comprises nineteen compound categories, most demanding “all Documents and Communications” on multiple subjects, for a period from January 1, 2024, through the date of production, with no time limit at all for documents concerning the formation or origination of any entity, agreement, or right (Instruction M), and concludes with a catch-all demand for all documents and communications “concerning Cartwheel Robotics, Inc.” (Request No. 19).

3. The Wong Parties further object to the Subpoena as irrelevant, overbroad, and disproportionate to the bankruptcy case, as the requests do not seek information to which LaValley is not entitled.

4. The Wong Parties further object to the Subpoena to the extent the requests therein seek information and/or documents containing commercially and competitively sensitive, confidential, proprietary, and/or trade-secret information and/or material impinging on the privacy interests of the Wong Parties and other non-parties.

5. The Wong Parties further object to the Subpoena as the Subpoena seeks to circumvent the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure to obtain information for unknown purposes which are unrelated to the administration of the estate.

6. The Wong Parties further object to the Subpoena as an improper attempt to obtain, without leave of Court, the same discovery that Mr. LaValley and Samantha Conway seek through their pending motions for Rule 2004 examination [ECF Nos. 63, 88, 90, 97, and 99] (the “2004 Motions”). The Petitioning Creditors have opposed the 2004 Motions [ECF No. 103], and the 2004 Motions are set for hearing on October 6, 2026. The dispute over an opposed Rule 2004 request “involves the right to the examination itself.” *Rigby v. Mastro (In re Mastro)*, 585 B.R. 587, 598 n.16 (B.A.P. 9th Cir. 2018). LaValley may not use a subpoena to obtain the very discovery, the propriety of which is pending before the Court.

7. The Wong Parties further object to the Subpoena because it exceeds the permissible

1 scope of discovery in a bankruptcy case. Examination under Fed. R. Bankr. P. 2004 is limited to the
 2 acts, conduct, or property or the liabilities and financial condition of the debtor, and to matters that
 3 may affect the administration of the debtor's estate. Fed. R. Bankr. P. 2004(b). The Subpoena seeks
 4 the internal formation, ownership, management, investment decisions, and investor communications
 5 of the Wong Parties, and non-debtor investment vehicles.

6 8. The Wong Parties further object to the Subpoena because LaValley has no authority
 7 to act on behalf of the Trustee. To the extent the Subpoena seeks information to investigate potential
 8 claims of the bankruptcy estate, that investigation belongs to the Chapter 7 Trustee, not to LaValley.
 9 To the extent the Subpoena seeks information concerning LaValley's personal disputes, including
 10 the alleged signature on an April 2025 bridge financing term sheet, statements allegedly made
 11 concerning a financing transaction, and life insurance on LaValley's life, it seeks discovery in aid
 12 of LaValley's private interests rather than the administration of the estate.

13 9. The Wong Parties further object to the Subpoena to the extent it seeks documents or
 14 communications protected by the attorney-client privilege, the work-product doctrine, the common-
 15 interest doctrine, or any other applicable privilege or protection, including communications between
 16 the Wong Parties or the Petitioning Creditors and their counsel concerning the involuntary petition
 17 and this bankruptcy case. FRCP 45(d)(3)(A)(iii).

18 10. The Wong Parties finally object to the Subpoena because it fails to comply with
 19 Local Rule 9016(b). The Subpoena was not served until September 24, 2026, and therefore, it
 20 requires the Wong Parties to respond within a time period that is less than the 14-day period provided
 21 under Local Rule 9016(b). *See* Local Rule 9016(b) ("[T]he attorney for the party may issue and
 22 serve a subpoena duces tecum using Official Form 2570 **as long as the date set for production is**
 23 **more than 14 days from the date of service of the subpoena**; otherwise, the attorney for the party
 24 must proceed under LR 2004(d) and obtain a court order in advance.").

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1 The Wong Parties reserve all rights, including the right to supplement or amend these
2 objections, to move to quash or modify the Subpoena or for a protective order, and to seek sanctions
3 under FRCP 45(d)(1).

4 DATED this 25th day of September, 2026.

5 McDONALD CARANO LLP

6 By: /s/ Sallie B. Armstrong

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13 *Attorneys for Petitioning Creditors*
14 *and the Wong Parties*

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2026, I served the foregoing document on the following parties through the Court's CM/ECF electronic mail system at the addresses listed below:

BRADLEY G. SIMS - trustee@trusteesims.com, bgs@trustesolutions.net

U.S. TRUSTEE - RN - 7 - USTPRegion17.RE.ECF@usdoj.gov

JACOB L. HOUMAND jhoumand@houmandlaw.com, bsims@houmandlaw.com,
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I further certify that I caused to be served the foregoing document on the following parties by U.S. first-class mail, postage prepaid as indicated below:

6127 RENO HWY LLC
C/O WILLIAM (BILL) LAVALLEY
6127 RENO HWY
FALLON, NV 89406

Cartwheel Robotics Inc.
6127 Reno Hwy
Fallon, NV 89406

AUTONOMOUS OPS, INC.
C/O WILLIAM (BILL) LAVALLEY
6127 RENO HWY
FALLON, NV 89406

Scott LaValley
5586 Rivers Edge Drive
Fallon, NV 89406

Samantha Conway
5512 Rivers Edge Drive
Fallon, NV 89406

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 25th day of September, 2026.

/s/ Misti Hale
Misti Hale