

Cartwheel Robotics Inc. 26-50278-RE-9-28-26 341 MOC Pt 1

[Speaker 1]

All right everyone, this is going to be track number one calling case number 26-50278 in raid Cartwheel Robotics Inc. This is the time and place for the one, two, three, four, fifth continued 341 for Cartwheel Robotics Inc. case number 26-50278 HLB.

What we'll do is we'll start with appearances. Let's go ahead and go around the room. Who do I have appearing for the debtor today?

Myself, Scott LaValle. Scott LaValle, you're here. Ms. Conway, are you here?

[Speaker 3]

I am here.

[Speaker 1]

All right, could you state your full name for the record? Samantha Conway. All right, let's go ahead and let's swear in Mr. LaValle. Mr. LaValle, will you raise your right hand and you solemnly swear affirm to tell the truth, the whole truth, and nothing but the truth? I do. That'll do.

Go ahead and put your hand down. Ms. Conway, will you please raise your right hand? Do you solemnly swear to tell the truth, the whole truth, and nothing but the truth?

I do. That'll do. All right, put your hand down.

All right, Mr. Anderson, where are you at?

[Speaker 4]

I'm here on the screen. Can you see me? I can see you.

How are you doing, Mr. Anderson? Very great. Thank you very much again for your consideration in moving this hearing to allow me time to kind of get on board and be ready to go.

[Speaker 1]

There's a lot to absorb. It's great to finally meet you in person. I think I followed you on a case or two over the years.

[Speaker 4]

We've crossed paths many times.

[Speaker 1]

But I don't think, well, in person. In person on Zoom. As in person as things get in today's day and age, it's wonderful to see you.

So Mr. Anderson, why don't you go ahead and state your appearance?

[Speaker 4]

Sure. Caleb Anderson, counsel for Scott LaValle and Samantha Conway for limited purposes of just this 341A hearing.

[Speaker 1]

All right. So and just to clarify, you're, for lack of a better term, specially appearing? Brief, yes.

Okay. In other words, you've been retained to represent parties specifically for the 341 hearing and the representation at this time does not extend beyond that?

[Speaker 4]

That is correct. All right.

[Speaker 1]

And just so that I'm clear on the record, you are retained to represent Scott LaValle and Samantha Conway in their individual capacities. Is that correct?

[Speaker 4]

Their capacities as representatives of the debtor.

[Speaker 1]

Perfect. Okay. All right.

Now that, oh, we've got one more person who's straggled in. Let's get them in. All right.

Now that I have appearances for the debtor and the debtor's representatives, let's see. Do I have any creditors here? Mr. Dehu, are you here?

[Speaker 7]

Good morning, Trustee Sims. Jimmy Dahu from McDonald's Cronin on behalf of RSF Robotics One, the Wong Family Revocable Trust and Nevada Battle Born Growth Escalator, Inc.

[Speaker 1]

All right. And for the record, your client, one of your clients, Mr. Wong, is on the phone as well. Is that right?

[Speaker 8]

Yes, it appears so.

[Speaker 1]

All right. That's good. Let's turn, let me just go down the list on the side of my screen.

Do I have someone named Nettie Oliverio here?

[Speaker 6]

Yes. Good morning.

[Speaker 1]

All right. Ms. Oliverio, who are you here representing?

[Speaker 6]

Foothill Partners, the Addy District LLC.

[Speaker 1]

All right. And that was a lease that the debtor had. Is that right?

[Speaker 6]

That is correct.

[Speaker 1]

Was that a real property lease or what lease was that?

[Speaker 6]

Yes. Real property.

[Speaker 1]

What, just so that I can store everything in my brain. What real property was that lease for?

[Speaker 6]

It is for the Addy District on Addy Boulevard in Sparks.

[Speaker 1]

Okay. All right. So, Nettie Oliverio, you're here for Foothill.

Let's see. Jimmy, we've got your appearance. Sean is here.

Sean, are you planning on making an appearance in Cartwheel Robotics? Are you here for Pleasants? I was here for Pleasants.

All right. Well, I'm not, I wasn't planning on taking appearances on that one. I'm just going to conclude it on the record.

[Speaker 4]

Okay. Then I'll jump off.

[Speaker 1]

You can jump off. No, you're fine. I appreciate you checking and making sure.

All right. All right. Take care.

And then do I have a Steve Rosenbluth? Yes. Hello.

Mr. Rosenbluth. Hello. How are you today?

I'm all right. All right. And are you representing anyone?

Are you representing yourself? What capacity are you here in?

[Speaker 5]

I'm the president of Concept Overdrive Incorporated and we're creditors. I'm forgetting which way you say this. But yes, we're owed money by Cartwheel.

[Speaker 1]

Owed money by Cartwheel. I think generally the term for that is creditor. All right.

Okay. And which creditor are you here for again?

[Speaker 5]

Concept Overdrive.

[Speaker 1]

Concept Overdrive. And what's your relationship to Concept Overdrive?

[Speaker 5]

I'm the president. Okay.

[Speaker 1]

All right. All right. Let's see.

All right. Do I have any other party whose appearance I haven't noted? Anyone at all?

Don't be shy if you're out there. All right. So let's see.

We've taken appearances. We've sworn the debtors. All right.

Let's just clarify. We've had a lot of testimony in this case prior. So we do finally have schedules.

And so my intention today is to focus questions on the schedules. I'm going to ask the questions that I generally ask in a Business 341 as I can finally do that. So let me just clarify a few things for the record.

Let's direct this to Mr. Lavalley. Mr. Lavalley, just to clarify one more time, what was your position with the debtor? CEO.

All right. And then Ms. Conway, what was your position with the debtor? COO.

All right. So I'm going to start with Mr. Lavalley. Mr. Lavalley, are you familiar with the petition and schedule?

Well, are you familiar with the bankruptcy schedules that have been filed by the debtor? I am. All right.

And how is it that you're familiar with those schedules?

[Speaker 2]

I completed them.

[Speaker 1]

All right. Ms. Conway, are you familiar with the bankruptcy schedules?

[Speaker 3]

Yes, I am.

[Speaker 1]

All right. And how is it that you're familiar with them? I worked with Scott for order to file them.

All right. Okay. And there's a small chance that I've made this work correctly.

I think I've tried to put them up on the screen. Does this look like the bankruptcy schedules? Yep.

And Ms. Conway, is that your testimony as well? Yes. All right.

Yes, it appears to be. Okay. All right.

Who signed these bankruptcy schedules, Mr. Lavalley? Was it you or was it Ms. Conway or me? I believe I did.

Okay. I signed and filed. Okay.

So is that signature your own? Show me. Well, let me see if I can find it.

Let me see if they are signed.

[Speaker 2]

I'm looking at the docs myself trying to figure out.

[Speaker 1]

Usually it's the last page. Okay. I think roundabout page 33 is the financial affairs.

Is there a deck? No, wait, hold on. Let me see.

[Speaker 2]

I see here. It's on 207, right? Should be.

Yep. That's me.

[Speaker 1]

Okay. Initial form 207. That's statement of financial affairs.

Let's see. Do we have a declaration in support of the schedules? Yeah.

It's a separate form, but we do have schedules. Age, co-debtors. Let's see.

There's usually a declaration concerning the schedules. I don't see it on that document.

[Speaker 2]

Is it part 14 of 207?

[Speaker 1]

Let's see. That would be the statement of financial affairs. Official form 206 AB.

I apologize if this is tedious for any of the people watching, but it's important. I don't see a declaration concerning debtor's schedules. I apologize.

I didn't note it in preparation for the hearing, otherwise I would have contacted you. That may just need to be filed. Okay.

All right. But you have had a chance to review these schedules and you're familiar with them? Yes.

All right. Did you read the petition schedule statements and related documents before you signed them?

[Speaker 2]

Did I read the schedules before I signed them?

[Speaker 1]

Yeah.

[Speaker 2]

Well, yeah. I completed them.

[Speaker 1]

Okay. And Ms. Conway, did you read and examine these schedules before they were filed? Yes.

All right. And we've covered this a little bit, but Mr. Lavalley, you're personally familiar with the information contained in these schedules, statements, and related documents? Yes.

All right. Ms. Conway, are you familiar with the information contained in the schedule statements and related documents? Yes.

All right. And Mr. Lavalley, to the best of your knowledge, is the information contained in the schedules and statements and related documents true and correct? Yes.

Ms. Conway, same question. To the best of your knowledge, is the information contained in the schedules and statements and related documents true and correct? Yes.

All right. Mr. Levallee, are all the assets of the debtor identified on the schedules?

[Speaker 2]

I believe so.

[Speaker 1]

Alright. Ms. Conway, are all the assets of the debtor identified on the schedules? Yes.

Alright. Mr. Levallee, are all the creditors of the debtor listed on the schedules. To the best of your knowledge.

[Speaker 2]

Yes, to the best of my knowledge.

[Speaker 1]

Alright. And Ms. Conway, to the best of your knowledge, do the schedules and statements list all of the creditors of this debtor? Yes.

Alright. We've covered, let's see, we've covered in the past, business did cease operations. We covered the nature of the debtor's business, covered the members and shareholders.

All right, okay. So, Mr. LaValle, I have on the line a second creditor for a business premises. Did the debtor operate, well I know the debtor operated out of that 6127 Reno Highway.

Did it have a second location?

[Speaker 2]

Not that I'm aware of.

[Speaker 1]

All right, Ms. Conway, did the debtor have a second location it was operating out of? We had a future lease. Future lease.

All right, so the debtor was planning on moving premises from 6127 and going to another place. Correct, yes. And did the debtor sign a lease or perspective lease for for that premises?

[Speaker 2]

Yep.

[Speaker 1]

All right, and Ms. Conway, I'm gonna, we're recording this so I can see you nodding your head and I know what that means, but I got to have you answer out loud. Yes. Okay, all right, and why was the debtor looking to move locations?

[Speaker 2]

Get closer to Reno. Closer. And expand.

All right.

[Speaker 1]

Okay, let me take a little look at the debtor's schedules and we'll go from there. Let's take a look. Now I'm gonna play with fire and try and share my screen one more time.

What the heck is going on? Let's see. Screen one.

That's what I want right there. All right. All right, are you able to see this document that I'm scrolling through?

Yes. All right, so did the debtor have any cash on hand as of the date of filing? Unknown.

Unknown, all right. Do you know who would know?

[Speaker 2]

I think it's unknown. Sam, do you have?

[Speaker 3]

There is no cash on hand for the business.

[Speaker 1]

All right, let's see. Okay, and then we've got checking accounts. We've got an attachment, so we'll look at that.

Okay, all right, so these are all the assets of the debtor. It looks like they're mostly gone by the filing date. We have AB part 11 continuation, potential causes of action, rights of discovery.

So we'll scroll down here and take a look at those. All right, so part one, checking and savings. We've identified one, two, three, four, about five Bank of America accounts.

Is that right? Yes. All right, and then what's happened to the \$5,144.47 that was in this savings account?

[Speaker 2]

I need to look at the bank statements.

[Speaker 1]

Okay, let's see, and then continuation, interest in insurance policies, potential insurance rights, current value unknown. What interest in insurance policies does the debtor have that you're aware of, Mr. Lavalle?

[Speaker 2]

That's DNO, right? DNO coverage?

[Speaker 1]

Would probably include that, yeah. Does the debtor have DNO coverage? I believe it does.

All right. Ms. Conway, are you aware if the debtor has DNO coverage?

[Speaker 3]

The debtor had DNO coverage, and they believe a tail policy was purchased.

[Speaker 1]

All right, do you know when the tail policy ends? When it ends? In other words, is it coming up to be canceled?

[Speaker 2]

We did receive notice from DNO that there was concerns about payments being made on the full policy prior to the tail policy.

[Speaker 1]

Okay, could you forward that communication to my counsel if you haven't done so? All right, so we've got line 74, cause of action against third parties, governance and fiduciary claims involving Gene Wong RSF. Who did you mean by RSF?

[Speaker 2]

Reno Seed Fund.

[Speaker 1]

All right, so that's clear on the record. What potential causes of action do you believe the debtor

possesses? This is the debtor, not anyone individually, but the debtor.

What potential causes of action do you believe the debtor possesses against either Gene Wong or RSF?

[Speaker 2]

I think it spells it out, but fiduciary duty, breach of.

[Speaker 1]

Okay, what would be the basis of the breach of fiduciary claim, fiduciary duty claim?

[Speaker 2]

I would need to speak to an attorney to understand that better.

[Speaker 1]

Okay, all right. Ms. Conway, do you have any insight into what the basis of a breach of fiduciary claim against either Gene Wong or RSF would be?

[Speaker 3]

I think it's spelled out here with the, there was some breaches early on and throughout.

[Speaker 1]

Okay, are there any facts you're aware of that give rise to that? I mean, roughly, if I'm, if I were to go out and allege a claim against Gene Wong and RSF or RSF, what exactly would I be saying they did wrong?

[Speaker 2]

Investor side pressure, I mean, it says it right here, right? No daughter consent, protective provisions, were they proper or not, suing, threats of suing throughout, you know, the business operations.

[Speaker 1]

All right, do you have any sense of what these, the value of these claims would be? No idea. Okay, all right, and then you've listed financing interference.

What exactly would be the substance of that claim?

[Speaker 2]

Again, threatening to sue if potential acquisition wasn't churned down, threatening to tank the deal if Gene's protective provisions were not reinstated, along those lines.

[Speaker 1]

Okay, and was this, I'm seeing this roughly, I have a little bit of time on my head, is this a rise out of conduct that occurred on or about August 18th?

[Speaker 2]

Yes.

[Speaker 1]

All right, was Gene Wong a member of the debtors board on or about August 18th?

[Speaker 2]

I don't think he ever was properly appointed to the board.

[Speaker 1]

Okay.

[Speaker 2]

Part of the dispute.

[Speaker 1]

All right, he may or may not have been, was he... Maybe de facto. All right, even if it was improper, was he on the board on August 18th, 2025?

[Speaker 2]

De facto, director.

[Speaker 1]

Okay, all right, and then again, was he on the board even if improperly so on November 6th, 2025?

[Speaker 2]

I don't recall at what point the COF was updated, so he may or may not have been a director at that time.

[Speaker 1]

All right, all right, and then you've got engineered arts and other strategic transaction interference, and this is again a claim against Gene Wong. What exactly is that claim?

[Speaker 2]

That's when EA initially wanted to acquire Cartwheel and Gene thought it was too early and threatened to sue if I didn't turn down that acquisition.

[Speaker 1]

All right, and roughly when did that take place?

[Speaker 2]

Oh, geez, very, very early on. Samantha might have a better understanding of the date.

[Speaker 3]

It was around April of 25.

[Speaker 1]

April of 2025, okay. All right, and then I've got amended certificate of incorporation and government's document claims. This is again a claim against Gene Wong and RSF related entities.

What is the substance of this claim that's been listed?

[Speaker 2]

Was it was it ever properly amended? Okay. We had dual representation.

Okay, when you say there was no shareholder approval or board consent to make that change, and there was no proper informed consent to the CEO to make that change.

[Speaker 1]

Okay, what do you mean by there wasn't proper? What do you mean?

[Speaker 2]

Counsel did not run us through word-by-word the language in that ACOI. Okay, and as he did with the notes. Okay, which notes?

The convertible notes.

[Speaker 1]

Okay, all right, so and then you've got prior counsel Craig Macy, professional liability and conflicts claims. What's the substance of that claim?

[Speaker 2]

He represented both RSF, Gene Wong, we believe, and Cartwheel Robotics without a conflict waiver. We don't know who he was really acting for.

[Speaker 1]

Okay, all right, and what, for lack of a better phrase, what exactly do you believe Craig Macy did wrong in representing both of you?

[Speaker 2]

He committed potentially malpractice. How? I think we'd have to dig into that.

I think an attorney would have to dig into that.

[Speaker 1]

All right, then you've listed 74.6, loss of financing, strategic alternatives, and enterprise value, potential claims against directors, officers, and potential creditors. All right, what's the substance of this claim?

[Speaker 2]

74.6, petitioning creditors. I think that Gene impaired strategic alternatives, and we missed out on opportunities to be acquired.

[Speaker 1]

Okay, all right, and then I've got 74.7, petitioning creditors, side-by-side conduct. What's the substance of this claim?

[Speaker 2]

This was a demand letter conduct acceleration. To this day, we still don't know what note holders Gene or his attorney represented at the time that these notes were supposedly accelerated. It's the same thing in the demand letter.

We don't know who, what note holders he was actually speaking for. We don't know what type of vote was taken by the note holders to accelerate.

[Speaker 1]

Okay, all right, and then you've got 74.8, potential cartwheel-owned claims implicated by creditor allegations. What's the substance of this of this claim?

[Speaker 2]

Potential cartwheel-owned claims. I'd have to dig into this one.

[Speaker 3]

All right.

[Speaker 2]

Sam, do you have any color?

[Speaker 3]

No, I think some of these merged together.

[Speaker 2]

Yeah, I think a lot of them overlap.

[Speaker 1]

All right, okay, and then I've got other professional and third-party liability complaint. Potential claims against officers, directors, and investors, petitioning creditors, piracy, etc. What's the substance of this claim?

[Speaker 2]

Professional and third-party liabilities, potential claims against directors, officers, investors. Yeah, it's all overall with respect to governments and financing strategic alternatives. So, it's all overlapping around interference.

[Speaker 1]

Okay, and then I've got 74.10, other potential causes of action, rights of recovery. Do you know what the substance of this claim would be?

[Speaker 2]

Pre-petition events for the restitution. Yeah, I think a lot of this depends on the discovery, protection of documents through Rule 2004.

[Speaker 1]

All right. All right, and so then I've got a line 75 that says counterclaim self-recruitment contribution indemnification right. Is there anybody against, well, is there anybody who has to indemnify Cartwell Robotics or whom Cartwell Robotics might have a claim against for indemnification?

[Speaker 2]

I'm not sure.

[Speaker 1]

Okay. Ms. Conway, do you have any insight? I do not.

All right, Schedule D, a bunch of secured creditors. Well, we've got you, Mr. LaValle, and you, Ms. Conway, and that arises out of UCC, a UCC security interest that was recorded?

[Speaker 2]

Yes, yes.

[Speaker 1]

All right. Okay. All right, I'm sure that will come up a little bit more.

All right, and then we've got a list of creditors. Mr. LaValle, you've listed a claim for deferred wages. Yep.

Is there an agreement that entitles you to deferred wages?

[Speaker 2]

There's no paper agreement. I was not paying myself market rate for a very long time and going without pay.

[Speaker 1]

All right, Ms. Conway, is there a written agreement that entitles you to \$183,645.82 in deferred wages?

[Speaker 3]

There is no written agreement. All right. Our attorney would not allow that at the time.

[Speaker 1]

And who was that attorney? Craig Macy. Craig Macy.

Okay. Let's see, we've got Murphy, Concept, Overdrive, Fenwick & West, California Franchise Tax Board for unpaid taxes, Longboat Trust, Convertible Promissory Note. Let's see.

Okay. So, going back to this lease at the Audie District, when was this signed, this lease?

[Speaker 2]

I don't have the date in front of me.

[Speaker 1]

Do you know roughly?

[Speaker 2]

I don't, Samantha.

[Speaker 3]

It was a conditional letter of intent, then it transferred to a lease. I don't have the exact dates that was signed.

[Speaker 1]

Was it in 2025? It would have been before or after June 1st, 2025?

[Speaker 3]

It would have been after, I believe. I'm not sure, though. We'd have to...

Nettie might be able to give color on that.

[Speaker 1]

All right. Well, I don't have Nettie under oath. She's here voluntarily.

She's not here to represent the debtor. I don't have the ability to compel her to answer under oath. 6127 Reno Highway.

All right. No executory contracts or leases. Co-debtors.

Mr. LaValle, did you cosign or are you personally liable on any debts of the debtor?

[Speaker 2]

Not that I'm aware of. All right.

[Speaker 1]

Ms. Conway, did you cosign or are you personally liable on any debts of the debtor?

[Speaker 3]

No, I am not. And this was all as of date of bankruptcy.

[Speaker 1]

All right. I just wanted to double check and make sure. Let's see.

We've got revenue. All right. We've got contemporaneous reimbursement of ordinary business expenses.

That's in the bank statements. We've got the strict foreclosure. All right.

How did you come up with the value of the property transferred on number five? Which schedule is this? This is on the Statement of Financial Affairs.

It's found at ECF number 96, page 22 of 33.

[Speaker 2]

I believe that's from the appraisal.

[Speaker 1]

The appraisal was about \$200,000 more.

[Speaker 2]

Not after you subtract out the leases. All right. So you netted some leases to come up with this number?

Yeah.

[Speaker 3]

The leased equipment was removed from the transfer.

[Speaker 1]

Okay. But the leased equipment was transferred, right?

[Speaker 2]

Do you have to review the agreement, the foreclosure agreement on what was transferred? All right.

[Speaker 1]

Is it your understanding that the leased equipment was transferred? I think it was abandoned. It was abandoned.

What does that mean?

[Speaker 2]

It means it was left on premise.

[Speaker 1]

Okay. It was left on premise by the debtor?

[Speaker 2]

Yes.

[Speaker 1]

And you don't know what happened to it?

[Speaker 2]

After it was left on premise? Yes. I'm assuming it was probably taken back by the leasing companies.

[Speaker 1]

Did 6127 Reno Highway come into possession of that property?

[Speaker 2]

Did they come into possession of that property? Well, I'd stick with what I said. It was abandoned.

So, yeah.

[Speaker 1]

Payments, set-offs, distribution, or withdrawals. All right. Why are the liens that were perfected in favor of Scott LaValle, Samantha Conway, and 6127 not listed in this section?

Payments, distribution, and withdrawals credited or given to insiders.

[Speaker 3]

I don't think that's a payment, distribution, or withdrawal from my understanding.

[Speaker 1]

All right. It does say provide an insider with value in any form. A lien is value.

[Speaker 3]

The lien existed prior to a year before.

[Speaker 1]

But it wasn't perfected.

[Speaker 3]

I'm not familiar with...

[Speaker 2]

Yeah, we're not bankruptcy attorneys, or CPAs, or bookkeepers, or accountants. So, if it should have been here, then we can refile and add it.

[Speaker 1]

All right. My opinion is that should be done. I'll let you discuss that with your attorney, because it's not my opinion that governs what appears on this.

All right. But I'll leave it to you and your attorney to discuss that. All right.

Let's take a look. Let me stop the sharing. All right.

Okay. Let's see. We've done that.

Do I have a copy of the debtor's latest tax return?

[Speaker 2]

I don't know.

[Speaker 1]

Let's see. I'll have to take a look and see. Ms. Conway, who was the accountant that filed the last

tax return for the debtor?

[Speaker 3]

It was Albright and Associates.

[Speaker 1]

All right. And to the best of your knowledge, did it file a 2024 tax return?

[Speaker 3]

Our fiscal year was off, so I'm not sure. 24 versus 25. But they filed the last one.

The previous CPA filed before that.

[Speaker 1]

Okay. All right. Okay.

Those are my questions for the debtor. I have a number of parties here. I want them to be able to ask the questions that they want to ask.

Why don't we take a 10-minute break? We'll come back on, and we'll start with creditor questions. So I'm going to go ahead.

I'm going to put everybody back in the waiting room. We'll take a 10-minute break, and we'll resume. All right.

All right. And put everyone back in. Here we go.

Off record.

Cartwheel Robotics Inc. 26-50278-RE-9-28-26 341 MOC Pt 2

[Speaker 2]

This is track two. We are back on record in case number 26-50278 in Ray Cartwell Robotics, Inc. All right, I've concluded my questioning of the debtor for the day.

Those are the questions that I have, so at this time we'll go ahead and let any creditors who wish to inquire of the debtor, they can go ahead and ask their questions. Ms. Oliverio, would you like to begin? Do you have any questions that you'd like to ask the debtor's representatives at this time?

I do not, thank you. All right. Mr. Rosenbluth, do you have any questions that you would like to ask the debtor's representatives at this time?

[Speaker 5]

Really, this is my first time, so really just very general. What is the the nature of the dispute? There's this company, RSF.

What is RSF claiming in terms of what might have been done wrong by the debtors?

[Speaker 2]

And is that question directed to Mr. LaValle or Ms. Conway?

[Speaker 5]

That's directed to the debtors, to either Scott or Samantha.

[Speaker 4]

Yeah, Steve, I think most of that's covered on the record to the docket, but they've made numerous claims.

[Speaker 5]

Okay. I mean, my position as a creditor is that I worked with Cartwheel as an engineering consultant, so if there's anything that I can clarify as part of those claims, I would, because I observed the business operations of Cartwheel to some extent. Okay.

[Speaker 2]

All right. Do you have any further questions for the debtors at this time?

[Speaker 5]

No. All right.

[Speaker 2]

Mr. DeHue, are you out there?

[Speaker 1]

Yes, sir. Thank you, Trustee Simms. Yes.

Hi, Scott. Nice to meet you, Samantha. So in your schedules, you've identified various forms of liability against various parties, including directors and officers.

Does that mean you also believe that both Scott and Samantha also have potential liability?

[Speaker 4]

I think we do through the claims that you're making.

[Speaker 1]

Samantha, do you agree?

[Speaker 3]

Through the claims that you're making.

[Speaker 1]

Okay. So independently, you don't believe that there are claims against you on behalf of the debtor? I object to your claims.

Okay. That's fine. You issued a subpoena against Gene Wong.

What's the purpose of that subpoena, Mr. LaValle? To support the 2004 motion. Support the trustee in the pursuit of his investigation?

[Speaker 4]

To support the claims that have been introduced on the schedules and the questions that I have outstanding through my 2004.

[Speaker 1]

Okay. Can I ask you what efforts you've made to obtain documents of Cartwheel Robotics other than issuing a subpoena to Gene Wong? I've requested information from the trustee.

Okay. Samantha, have you made any efforts to obtain documents about Cartwheel Robotics independently?

[Speaker 3]

No.

[Speaker 1]

No? Okay. Mr. LaValle, have you attempted to obtain documents from Bill LaValle?

[Speaker 4]

I believe the trustee has subpoenaed Bill LaValle and I've obtained those documents through the docket.

[Speaker 1]

The docket, but you've not independently asked your father, Bill LaValle, about documents you voluntarily turned over to him. Is that correct? He's been subpoenaed by the trustee.

Okay. Do you believe the documents he's produced constitute the universe of documents that Cartwheel Robotics had in its records that voluntarily turned over to him under the so-called UCC-1?

[Speaker 4]

He was not an officer or employee of the company, so I'm sure he has not produced everything that the company possessed.

[Speaker 1]

Have you attempted to obtain documents from 6127 Reno Highway LLC? Not made that request. You've made that request?

I said I did not make that request. Have you attempted to obtain documents from Autonomous Ops? Nope.

Have you attempted to obtain documents from Ms. Conway, your sister? I have spoken with her. Okay.

Other than that, any attempts to look at what she may have in her possession to go through it together?

[Speaker 4]

We used what we had to create the 2004 documents that we've put on docket.

[Speaker 1]

Do you know what the landlord has done with Cartwheel Robotics' assets?

[Speaker 4]

No idea.

[Speaker 1]

No idea? To your knowledge, I believe you mentioned before that you believe he turned over the Yogi and the Speedy to the landlord as well? Everything was abandoned and assigned.

Okay. So no idea what the landlord did with it, right? No idea.

And the landlord is owned and controlled by your father, correct?

[Speaker 4]

It's owned and controlled by, I believe, multiple people. Is your father one of those people?

[Speaker 1]

I believe he is. Is your mother one of those people? She may be.

Is your sister one of those people? She may be. Are there any other people that are not your family that are associated with the landlord?

[Speaker 4]

No idea. Never seen the cap table.

[Speaker 1]

Okay. That's fun. So Ms. Conway, you are associated with 6127 Reno Highway, is that correct?

[Speaker 3]

I am not associated with 6127 Reno Highway.

[Speaker 1]

Were you associated with them when you were working with Cartwheel Robotics?

[Speaker 3]

Early on, yes. And what was your role? Sorry.

[Speaker 1]

I'm sorry. I didn't mean to cut you off. Please continue.

[Speaker 3]

I was an admin support.

[Speaker 1]

You were an admin support? You were not a secretary as noted on the Nevada Secretary of State's website?

[Speaker 3]

That was for admin secretary support.

[Speaker 1]

Okay. So not like a corporate secretary. You mean like an administrative secretary?

[Speaker 3]

I mean that I was able to file certain things in that role.

[Speaker 1]

File what things? Like state filings. Okay.

Were you associated with their business operations at all?

[Speaker 3]

No.

[Speaker 1]

Were you associated with the lease negotiation between the debtor and the landlord? There was no negotiation. How did the lease come about then?

[Speaker 3]

The Cartwheel attorney prepared it.

[Speaker 1]

There was no discussion between the landlord and the tenant regarding the terms of the lease?

[Speaker 3]

It was a pretty generic standard corporate commercial lease.

[Speaker 1]

Did you review it and approve it?

[Speaker 3]

I did not approve anything.

[Speaker 1]

Okay. Thank you. So Mr. Lavalley, can we briefly discuss your background?

You previously worked at Boston Dynamics. Is that correct? Yep.

What was your role at Boston Dynamics? Senior mechanical engineer. And what did that entail?

Did you work with robotics and AI in that role? Yes. Not AI.

AI wasn't a thing back then. Okay. And then you moved from Boston Dynamics, I believe you went to Disney.

Is that accurate? Yep. And what was your role with Disney?

Same. And you worked with, was AI a thing at that point in time? Nope.

Did you work on robotics with Disney? Yep. If I can ask you to say yes, please, just for the record, just to make sure there's no confusion.

Then after that, if I'm not mistaken, you decided to start Cartwheel. Is that accurate? Correct.

And why did you decide to do that?

[Speaker 4]

To continue working on small humanoid robots. Small humanoid robots? That's what you did?

Provide services, engineering services in that respect. Okay.

[Speaker 1]

And what you were doing at Cartwheel, was it a continuation of what you were doing at Boston

Dynamics and Disney? Similar technology, yes. Okay.

Did you take any information you learned from Boston Dynamics or Disney to incorporate into Cartwheel?

[Speaker 4]

No.

[Speaker 1]

Knowledge of trade. I'm sorry, can you repeat that? Knowledge of trade.

Knowledge of trade. Okay. Was Cartwheel's vision, research, and development in the field of robotics and AI, was it unique?

Was it unique? I mean, were there any other companies doing it or were you charting a new course?

[Speaker 4]

We were doing something different.

[Speaker 1]

Okay. And how was it different?

[Speaker 4]

It was geared towards the home, geared towards emotion, movement, scale.

[Speaker 1]

Okay. Now you work with Google DeepMind, is that correct? Yep.

Yes. And what is your role there, please? I see.

Senior Mechanical. Senior Mechanical. And do you work with the robotics and AI with Google DeepMind?

I can't speak to what I work on. You can't speak to what you work on? No, I cannot disclose what I work on.

Okay. You can't disclose what you work on? That is correct.

Is it because you are incorporating Cartwheel intellectual property into what you're working on with Google DeepMind?

[Speaker 4]

No, I have a confidentiality agreement with Google DeepMind.

[Speaker 1]

Okay. So you can't tell me one way or the other if you're using Cartwheel intellectual property? I cannot speak to what I do at Google DeepMind.

All right. You claim you don't currently have under your control or possession the Cartwheel source code. Is that accurate?

Yes. And you don't know where it's at. Is that accurate?

It's probably in the cloud somewhere. Probably in the cloud? But you don't have access to that cloud, do you?

That's correct. When did you lose access to that cloud? Can't you just create a new password and get in there?

[Speaker 4]

Well, someone would need the credentials and someone would need to probably pay the bill. Don't you have the credentials? I do not.

Do you have a past due invoice maybe you can pass along to the trustee? No. I'm not in possession or control of the debtor's credentials.

[Speaker 1]

Do you believe the landlord is in possession and control of the credentials? He may be. Is that part of the documentation that you handed over to the landlord?

There was no documentation. It was part of the books and records that you turned over to the landlord when you abandoned the lease? It may be included in that.

Okay. And you've made no effort to obtain that. Is that accurate?

The trustee has. You've made no effort to obtain that.

[Speaker 6]

Is that accurate?

[Speaker 1]

That's correct. I assume you keep up to date in the advancement of robotics and AI. Is that accurate?

Less these days. Yes. Less these days.

Okay. And part of that is observing what the competition is doing, correct?

[Speaker 4]

Okay.

[Speaker 1]

Yes. Okay. Do you see any of the competition developing robotics or AI?

Consistent with what Cartwheel was doing, the unique field that Cartwheel was trying to occupy? The emotional aspect of it? Well, whatever you identified as the unique aspects of Cartwheel's vision and goal.

Do you see anybody else kind of doing that? Yeah. There's probably two or three other companies.

Are any of these companies, any of the companies that may have access to Cartwheel's intellectual property and source code?

[Speaker 4]

Through people they've hired, possibly.

[Speaker 1]

And what companies would those be? Engineered Arts. And who are the people they hired that may have that source code?

Brian Stubb.

[Speaker 4]

Do you have the full names for them, please? I don't. Brian Rowe, Stubb, I don't remember his last name.

It's on docket, though. Thank you.

[Speaker 1]

So you've attached a lot of documents to your rule 2004 motions. Where'd you get those

documents?

[Speaker 4]

I did not attach a lot of documents to my 2004.

[Speaker 6]

So, trustee, I just want to object. We're way exceeding the scope of a 341 meeting. This is a 2004 examination to me, and I would request that Mr. Datt would be instructed to bring things back a little bit in the examination.

[Speaker 2]

I'm going to allow this to proceed. I do appreciate the objection that we're headed to a 2004 exam. The difference between a 2004 exam and a 341 is more of a spectrum than a hard, bright line.

But I'll let him continue on this, and I'm mindful of the objection, and I'll jump in if I think it is getting to be a de facto 2004 exam.

[Speaker 6]

Thank you, Mr. Trustee.

[Speaker 1]

And thank you. Mr. Anderson, I appreciate the objection, and thank you, Trustee Sims. I'm really just trying to identify items that have been noted in the schedules and trying to identify assets.

So previously, Mr. LaValle, we discussed the engineered arts opportunity that Cartwheel Robotics may have had. Do you recall those discussions? With you?

Well, just in general at these 341 meetings. I believe it's been brought up, yeah. Okay.

Now, we were talking earlier about Cartwheel's board of directors. So if you look at your statement of financial affairs, I'll just represent to you, has five board members. Well, actually, four board members during the period engineer arts presented you.

[Speaker 4]

Which document are you looking at?

[Speaker 1]

Your statement of financial affairs number 29. So you identify Samantha Conway as a board

member. Is that the 207?

Can you bring it up on your screen?

[Speaker 2]

Let me see if I can help everybody out here. And let me see if I can bring it up.

[Speaker 1]

Thank you, Trustee Sims. I'm so terrible at this.

[Speaker 2]

No, you're doing better than I can do. Let's see if I can figure this out a third time. All right.

And Mr. DeHoo, are you talking about this section right here?

[Speaker 1]

Yes. Yes. Thank you.

So, Mr. Lavalley, do you recall the engineered arts proposal came in October of 2025? Does that sound about accurate to you? I think it was probably earlier than that.

Earlier than that. Okay. So you've identified these five folks as board members.

Did you present that engineered arts opportunity to these five board members for their approval?

[Speaker 4]

Well, I think it depends on who was on the board at that time.

[Speaker 1]

Well, who was on the board at the time that you had the engineered arts proposal?

[Speaker 4]

I don't remember.

[Speaker 1]

Okay. Well, the board was very fluid and changing. Very fluid and changing.

You previously, did you present the board with, did you present any board members with the UCC-1 that you filed?

[Speaker 4]

We need to figure out the makeup of the board at that time. And we'd have to look at the corporate records. I'm not sure who and if it was presented.

[Speaker 1]

Okay. But you filled out these schedules and statement of financial affairs under penalty of perjury, correct? Correct.

Okay. So, I mean...

[Speaker 4]

And I have listed the directors. You've listed... I do not know what directors were part of the board at what point.

[Speaker 1]

Okay. So, this was just your best guess that you put in here? Period of time.

[Speaker 4]

Yeah, that's correct. That's why it says approximate.

[Speaker 1]

Okay. So, you mentioned previously Gene Wong may have been a de facto board director. Is that accurate?

I think that's what I said. Okay. And what is your understanding of what a de facto director is?

Like how did he become a de facto director? He said he was a director. Okay.

What was the process to appoint a director on the board?

[Speaker 4]

I don't believe there... We'd have to refer back to Craig Macy on exactly what process there was to elect new directors or how the investor director was selected. I don't believe there was a mechanism for that.

But Gene declared that he was a board member.

[Speaker 1]

Did you present... Regardless of whoever was on the board, the fluid nature of the board,

whenever you had a board in place, did you present opportunities to that board for their review and approval?

[Speaker 4]

We'd have to look at the minutes.

[Speaker 1]

Okay. I mean, was that part of your business operation though? Your normal ordinary business operation to present opportunities to the board for their review and approval?

The board was involved in all aspects along with our corporate attorney. Okay. You mentioned before you abandoned the leases.

Did the leasing companies have claims against the debtor? The equipment that you left in the building? Did they have claims?

I mean, you still owed amounts under those leases, right? Cartwell still owed amounts under those leases, correct?

[Speaker 4]

That's correct.

[Speaker 1]

Okay. Are those leasing creditors identified on these schedules and were they otherwise provided notice?

[Speaker 4]

I had to look through the schedules. I don't know if they are listed. I don't think they were debtors at the time of bankruptcy.

[Speaker 1]

Okay. Thank you. Now I have questions for Ms. Conway, please. So Ms. Conway, I mean, correct me if I'm wrong, but I believe you previously testified you weren't a director of Cartwell. Is that accurate?

[Speaker 3]

I have not testified.

[Speaker 1]

Okay. Or you stated that you didn't say one way or the other. So were you a director of Cartwell Robotics?

[Speaker 3]

I was a director for a very short period of time due to not having a functional board.

[Speaker 1]

Okay. Well, the Statement of Financial Affairs has you on there from November 21 through January 26. That's five years.

That's a little more than four years. Sorry. That's a typo.

[Speaker 4]

That's a typo.

[Speaker 3]

That's my role as COO, not my role as a director.

[Speaker 1]

Okay. My apologies. I misread it.

My fault. My apologies. Were you also associated with Autonomous Ops?

[Speaker 3]

I was a Corporate Secretary for Autonomous Ops prior to being involved with Cartwell, and I believe that continued under that definition.

[Speaker 1]

Okay. Do you know who the debtor's landlord was? Because Mr. LaValle was unclear in prior 341s.

[Speaker 3]

The debtor's landlord was 6127 Reno Highway, LLC.

[Speaker 1]

Okay. And you said... You filed the proof of claim in this case.

What is that proof of claim for?

[Speaker 3]

Me personally?

[Speaker 1]

Yes.

[Speaker 6]

I filed... Mr. Trustee, I'll object. This is a soliciting testimony of a creditor at this point, not a director of the association or a corporate representative, rather.

[Speaker 2]

Well, I mean, the problem is she's bold, right? The issue is that while she was the COO of the director, she's potentially perfecting a lien and generating a claim. And so I do think this bears on the schedules, and I think that's within the scope of the 341.

But I appreciate the objection.

[Speaker 1]

And I'll repeat the question. What's the proof of claim that you filed? What is that for?

[Speaker 3]

I filed two proofs of claim, I believe. Which one are you referring to?

[Speaker 1]

Well, let's start... There's one where I believe you identified you loaned money to the debtor. Is that accurate?

That's accurate. Okay. And why did you loan money to the debtor?

[Speaker 3]

Due diligence at the time. This was prior to investment. Had been dragging out.

We had reason to believe that Gene Wong and associated parties were going to invest. That process ended up taking six months, which was way beyond anticipated. To keep the company afloat, we had lease payments due.

And so I had to put in \$5,000 of my personal money just to be able to pay lease payments at the time. And I believe Scott followed after that, doing the same.

[Speaker 1]

And how much were the lease payments per month?

[Speaker 3]

I don't recall, but they were quite a lot when we didn't have any money.

[Speaker 1]

And the lease was with 6127 Reno Highlands? No, these were equipment leases. Equipment leases, okay.

And you didn't view this as a capital contribution? Please specify what you mean by that. Well, were you equity in Cartwheel Robotics?

[Speaker 3]

Did I have equity? Yes, I had equity.

[Speaker 1]

Okay, so you didn't view the money you provided to the debtor as an investment. You viewed it as a loan.

[Speaker 3]

Is that accurate? Correct. It was not an investment.

I could not afford to invest. Okay, did a board authorize the loan from you to the debtor? This was pre-investment.

So the only board member was Scott. And it was done under corporate advice at the time.

[Speaker 1]

Okay, and then at some point in time, you filed the UCC-1 to collateralize that, to perfect that loan. Is that accurate?

[Speaker 3]

The UCCs were filed in October. That is correct. The security interest was issued back in, I believe, July of, wait, was that 24?

[Speaker 2]

I'm going to jump in here because there was some passive voice used. And I need to clarify

because the question is specifically asked, you filed. So did you file the UCC for your secured claim?

[Speaker 3]

Yes, I did file my UCC. All right, go ahead, Mr. Day.

[Speaker 1]

Oh, thank you, Trustee Simms. Thank you for the clarification. So the UCC-1 was filed more than a year after you obtained your security interest.

Is that accurate? That's correct. Why did you decide to file your UCC-1 at that point in time?

[Speaker 3]

We had an acquisition from EA pending. And part of that acquisition included them issuing Cartwheel a secured note. And so as part of due diligence, we made sure that all existing secured obligations were properly documented.

We did not realize that a UCC was required until that point.

[Speaker 4]

Okay, do you know what other UCCs? Can we mute Gene Wong? There seems to be some background noise.

[Speaker 2]

So, yes, thank you. Mr. Wong, I'm going to mute you. You're going to have to take yourself off mute.

Later on, you're going to participate in the hearing of this question. I'm just going to mute you because we are getting a lot of background noise.

[Speaker 1]

Go ahead, go ahead. So Mr. Conway, you said the UCC-1s were filed because of the EA acquisition. What other security interests were perfected with UCC-1 filings at that point in time?

[Speaker 3]

Leased equipment. I believe they all had UCC filings.

[Speaker 1]

Okay, did Scott LaValle tell you to file the UCC-1 at that point in time?

[Speaker 3]

He did not tell me. It came up in discussions because we were reviewing the letter of intent, which was being signed the next day. And so it was part of something that was needed for due diligence with the acquisition.

[Speaker 1]

So, as Secretary of 6127 Reno Highway, did you also file the UCC-1 for that entity?

[Speaker 3]

Clarification, I had no managerial role in 6127 at that point in time.

[Speaker 1]

Okay, I think the Nevada Secretary of State's website reflects otherwise, but that's neither here nor there. Do you know who filed the UCC-1 for 6127 Reno Highway?

[Speaker 3]

I filed all UCCs on behalf of Cartwheel because it was needed because of the EA acquisition. Offer and the new security that was potentially being given to Cartwheel.

[Speaker 1]

So, you and your role as CEO of Cartwheel Robotics and no role with 6127 Reno Highway filed the UCC-1 on behalf of 6127 Reno Highway. Is that correct?

[Speaker 3]

I documented Cartwheel's existing secured obligations on behalf of Cartwheel for Cartwheel due diligence for a Cartwheel transaction.

[Speaker 2]

Hold on, I want to jump in. This is a very easy and very simple question. Did you file the UCC-1 for 6127 Reno Highway?

[Speaker 3]

Yes.

[Speaker 2]

Okay.

[Speaker 1]

Okay, and did you do that after discussing it with Bill LaValle or did you do that on your own?

[Speaker 3]

I did that on my own for discussions on Cartwheel's side regarding the letter of intent.

[Speaker 1]

Discussions with Scott, is that accurate?

[Speaker 3]

I believe yes.

[Speaker 1]

Okay, thank you. Were you involved? So, as the CEO, can you tell me what a COO does?

Do they maintain the debtor's books and records?

[Speaker 3]

I did maintain the debtor's books and records.

[Speaker 1]

Okay, were you involved with the turnover of those books and records to the landlord?

[Speaker 3]

I invited the landlord entity for the foreclosure agreement that as an officer I was then authorized to do to invite that entity to those accounts.

[Speaker 1]

I'm sorry, can you repeat that? I didn't quite understand.

[Speaker 3]

I invited the entity to the accounts necessary for the foreclosure agreement.

[Speaker 1]

When you say you invited, you mean you provided them online credentials?

[Speaker 3]

I invited them as a, yes, as a credential to the various accounts.

[Speaker 1]

Okay, and you no longer have access to those online accounts, is that accurate?

[Speaker 3]

That's correct. I resigned as an officer on, I believe, January 15th.

[Speaker 1]

If you wanted to re-access those online accounts, could you have the capability to do so?

[Speaker 3]

No, I do not believe so.

[Speaker 1]

I'm sorry, Scott, what did you say? That would be illegal. Okay, Samantha, do you know why the debtor did not simply initiate dissolution proceedings?

[Speaker 3]

I believe that was always the intent, but there was no money.

[Speaker 1]

There was no money to dissolve?

[Speaker 3]

Correct.

[Speaker 1]

Okay, do you know where the debtor's books and records and assets are now?

[Speaker 3]

I do not. I know that they were handed over for the foreclosure.

[Speaker 1]

Okay, do you speak with your father, Bill Lovelli?

[Speaker 3]

I do speak with my father.

[Speaker 1]

Do you speak with him daily, weekly? Periodically. Periodically.

Have you made an effort to ask him about these books and records or assets?

[Speaker 3]

I have not.

[Speaker 1]

Okay, regarding the future lease with Oddie District, was there a security deposit?

[Speaker 3]

I do not believe any money had exchanged hands.

[Speaker 1]

Okay, and I will just point out, you said it was a future lease, and you believe it was after May of 2025. I'm looking at claim number seven, followed by the Oddie District, and they have a commercial lease that is dated May 7th of 2024. Does that sound accurate to you?

[Speaker 3]

That's probably accurate. I do not have it in front of me to verify.

[Speaker 1]

Okay, do you know how was the debtor using those premises?

[Speaker 3]

That was going to be our main facility.

[Speaker 1]

But you had two leases at that time. I mean, what were you using that facility for? Was it just empty?

[Speaker 3]

We hadn't taken occupancy yet. It wasn't ready for occupancy.

[Speaker 1]

How were you making it ready for occupancy?

[Speaker 3]

We weren't yet. We were working with an architect to try to do planning for the space, but we had not done anything beyond that. They were still building it.

[Speaker 1]

Okay, and so is the \$60,000 on Schedule D, E, F, I believe, this is for both of you. You identify about an approximate \$60,000 obligation owed to them. Is that from this lease?

[Speaker 3]

That would be for the lease that was signed with Oddie.

[Speaker 1]

Okay, were you paying the Oddie District at all?

[Speaker 3]

Not at that, no.

[Speaker 1]

Were you paying 6127 Reno Highway on their lease at that time?

[Speaker 3]

I don't know which state you're referring to, but when we occupied 6127, we were paying rent to that landlord.

[Speaker 1]

So you did occupy, okay, you always, Cartwheel Robotics didn't have any, after receiving investment, Cartwheel Robotics' only lease was with 6127 Reno Highway. Is that accurate? That's accurate.

Okay, all right. I think that's all my questions for now. Thank you.

Thank you, Ms. Conway, Mr. LaValle, Trustee Simpson.

[Speaker 2]

All right, and then Mr. Hallman, and you've heard all the questions that have been asked, do you have any questions that you want to ask the debtors at this time?

[Speaker 4]

I do not have any questions at this time.

[Speaker 2]

All right, well, I had been prepared to conclude, but I have a lot of documents in this case, and I think that, given the testimony that's occurred today, and given some of the prior testimony, I have some things that I need to discuss with the Office of the United States Trustee. I don't think I have discretion to think I'm required to do that. I think that the best course of action is I'm going to continue this.

The only party that will be allowed to ask questions, if they desire to do so, at the continued 341, is going to be the Office of the United States Trustee. If the Office of the United States Trustee does not express an interest in asking debtors' representatives any questions, then we'll simply conclude the matter at that time. All right, now that doesn't mean that everyone's completely free.

There's Mr. Gabbale's got a motion regarding a 2004 exam and some discovery, you know, and parties are free to conduct 2004 exams as they deem appropriate. But I, let me take a look, because the schedule in October is rough. And again, this would strictly be for the purpose of allowing the United States Trustee the opportunity to examine debtors' representatives if they choose.

They may not do so. So, let's see, I want to give at least 30 days for me, for the U.S. Trustee, because their schedule in October is similarly complicated. I'm wondering if I go to November...

If I go to November 16th at 9.30 a.m., is that a workable date and time for you, Mr. Lavalley?

[Speaker 4]

Give me a second.

[Speaker 2]

All right.

[Speaker 4]

November what?

[Speaker 2]

16th, that's a Monday. Yeah, it's fine. All right, Ms. Conway, is November 16th at 9.30 a.m. a workable date and time for you? Yes. All right. Mr. Anderson, are you going to be my spoiler?

Is November 16th at 9.30 a.m. a workable date and time for you?

[Speaker 6]

Works for me.

[Speaker 2]

All right. So, the provisions are that I'm not going to take any creditor... taking any creditor questions on that day.

Everyone's had their opportunity. We've given Mr. Lavalley and Ms. Conway their time in the box. All right.

I've got significant discovery. I don't think I need any more questions on the record to the extent that I need to do, so I'll do a 2004 exam. All right.

This is strictly for the United States trustee, so if other parties wish to come and view those questions, if they happen, then they'll be able to do that. But I'm strictly going to hold this date for the United States trustee. If the United States trustee gets back to me and tells me they're not going to appear and they don't want to ask any questions, Mr. Anderson, I will communicate that to you and you may let Mr. Lavalley and Ms. Conway know and then they don't have to show up. All right.

[Speaker 6]

Perfect. Thank you very much.

[Speaker 2]

Does that work for everybody? Yep. All right.

Is there any objection to my proceeding in that vein, Mr. Dahoo?

[Speaker 1]

No, trustee. Thank you, sir.

[Speaker 2]

Ms. Oliverio, is there any objection to my proceeding in that vein? None. Thank you.

All right. Mr. Rosenbluth, is there any objection to my proceeding in that way?

[Speaker 5]

No, no objection.

[Speaker 2]

Robotics. November 16th, 930 AM. We may or may not see everyone back.

All right. And that will be... Let me make sure that gets on everybody's calendar that it needs to go to.

All right. That will be the disposition of this matter. Continue to November 16th at 930 AM, Mr. Anderson. Check with my office in advance of that matter to make sure you don't have to go if you don't need to. All right? Sounds good.

All right. We'll go ahead and stand and continue to that time. Everyone's free to go.

Thank you.

[Speaker 1]

Have a wonderful day.