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10 *[Proposed] Counsel for Chapter 7 Trustee*

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **DISTRICT OF NEVADA**

14 In re:
15 ROBERT C. GRAHAM, LTD. fdba ROB
GRAHAM & ASSOCIATES fdba
16 LAWYERSWEST,
17 Debtor.

Case No. BK-S-16-16655-BTB
Chapter 7

**EX PARTE APPLICATION FOR
EXAMINATION OF DANIEL A.
HEPNER, CHAPTER 7 TRUSTEE FOR
THE BANKRUPTCY ESTATE OF LINDA
MARIE GRAHAM, PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley

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22 Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate
23 by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local
24 Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA
25 L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by
26 and through her proposed counsel of record, Kathy Bazoian Phelps, Esq of the law firm of
27 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of
28 Nelson & Houmand, P.C., applies for an order directing Daniel A. Hepner (“Hepner”), Chapter 7

NELSON & HOUMAND, P.C.
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169
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1 Trustee for the bankruptcy estate of Linda Marie Graham, to appear for examination regarding
2 any and all transactions concerning the acts, conduct, or property or the liabilities and financial
3 condition of ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba
4 LAWYERSWEST (the “Debtor”), any other matter which may affect the Debtor’s estate,
5 including, but not limited to, all documents Hepner has received regarding Linda M. Graham
6 through her bankruptcy case No. 16-22532-CDP, and as to any matter permitted by Federal Rule
7 of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and marked as
8 **Exhibit “1”**.

9 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct Hepner
10 to appear for said examination on the 30th day of January, 2017, at 9:00 a.m. at the law offices of
11 Nelson & Houmand, P.C., 3900 Paradise Road, Suite U, Las Vegas 89169-0903.

12 Dated this 12th day of January, 2017.

13 **NELSON & HOUMAND, P.C.**

14 By: /s/ Jacob L. Houmand
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21 —and—

22 **DIAMOND MCCARTHY LLP**

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