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7 *Pro Hac Vice Application Pending*

*Electronically Filed On: January 12, 2017*

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17 *[Proposed] Counsel for Chapter 7 Trustee*

18 **UNITED STATES BANKRUPTCY COURT**

19 **DISTRICT OF NEVADA**

20 In re:

21 ROBERT C. GRAHAM, LTD. fdba ROB  
22 GRAHAM & ASSOCIATES fdba  
23 LAWYERSWEST,

24 Debtor.

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

27 **EX PARTE APPLICATION FOR**  
28 **EXAMINATION OF THE PERSON MOST**  
**KNOWLEDGEABLE OF MICHAEL S.**  
**MATHEWS, LTD. PURSUANT TO**  
**FEDERAL RULE OF BANKRUPTCY**  
**PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley

29 Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate  
30 by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local  
31 Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA  
32 L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by  
33 and through her proposed counsel of record, Kathy Bazoian Phelps, Esq of the law firm of  
34 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of  
35 Nelson & Houmand, P.C., applies for an order directing the person most knowledgeable of

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169  
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1 Michael S. Mathews, Ltd. (“Mathews”) to appear for examination regarding any and all  
2 transactions concerning the acts, conduct, or property or the liabilities and financial condition of  
3 ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba LAWYERSWEST  
4 (the “Debtor”), any other matter which may affect the Debtor’s estate, including, but not limited  
5 to, all documents related to tax returns prepared on behalf of the Debtor, Robert C. Graham, Esq.,  
6 or Linda M. Graham, Esq., and as to any matter permitted by Federal Rule of Bankruptcy  
7 Procedure 2004. A copy of the Proposed Order is attached hereto and marked as **Exhibit “1”**.

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

11 Dated this 12th day of January, 2017.

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

13 By: /s/ Jacob L. Houmand  
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20 —and—

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