

1 Kathy Bazoian Phelps, Esq. (CA Bar No. 155564)  
2 Email: kphelps@diamonddmccarthy.com  
3 DIAMOND MCCARTHY LLP  
4 1999 Avenue of the Stars, 11th Floor  
5 Los Angeles, California  
6 Telephone: 310/651-2997  
7 *Pro Hac Vice Application Pending*

*Electronically Filed On: January 4, 2017*

8 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
9 Email: jhoumand@nelsonhoumand.com  
10 Kyle J. Ortiz, Esq. (NV Bar No. 14252)  
11 Email: kortiz@nelsonhoumand.com  
12 NELSON & HOUMAND, P.C.  
13 3900 Paradise Road, Suite U  
14 Las Vegas, Nevada 89169-0903  
15 Telephone: 702/720-3370  
16 Facsimile: 702/720-3371

17 *[Proposed] Counsel for Chapter 7 Trustee*

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

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

18 Debtor.

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

**NOTICE OF HEARING ON  
APPLICATION TO EMPLOY NELSON &  
HOUMAND, P.C., NUNC PRO TUNC, AS  
GENERAL BANKRUPTCY COUNSEL  
FOR VICTORIA L. NELSON, CHAPTER  
7 TRUSTEE PURSUANT TO 11 U.S.C.  
§§ 327(a) AND 328(a) AND FEDERAL  
RULE OF BANKRUPTCY PROCEDURE  
2014**

Date of Hearing: February 15, 2017  
Time of Hearing: 10:00 a.m.  
Place: Courtroom No. 4, Second Floor  
Foley Federal Building  
300 Las Vegas Blvd., S.  
Las Vegas, NV 89101

Judge: Honorable Bruce T. Beesley

**NOTICE IS HEREBY GIVEN** that the *Application to Employ Nelson & Houmand, P.C., Nunc Pro Tunc, as General Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy Procedure 2014* (the

**NELSON & HOUMAND, P.C.**  
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169  
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 “Application”) was filed by VICTORIA L. NELSON, the Chapter 7 Trustee in the above-  
2 captioned bankruptcy case (the “Trustee”) by and through her proposed counsel of record, Kathy  
3 Bazoian Phelps, Esq of the law firm of Diamond McCarthy, LLP and Jacob L. Houmand, Esq.  
4 and Kyle J. Ortiz, Esq. of the law firm of Nelson & Houmand, P.C. The Application seeks to  
5 employ the law firm of Nelson & Houmand, P.C. (the “Firm”) as general bankruptcy counsel  
6 pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy Procedure 2014.  
7 Subject to Court approval, in accordance with 11 U.S.C. § 330, the Trustee seeks to retain the  
8 Firm on an hourly basis at the customary and standard rates that the Firm charges for similar  
9 representation, plus reimbursement of actual and necessary expenses incurred by the Firm in  
10 performing its duties. The Firm proposes the compensation of attorneys be at varying rates  
11 currently ranging from \$250 per hour to \$325 per hour for the services of attorneys, subject to  
12 change from time to time, and all subject to application to, and approval by, this Court pursuant to  
13 Sections 330 and 331 of the Bankruptcy Code. The Firm proposes the compensation of  
14 paraprofessionals be at varying rates currently ranging from \$175 per hour for paraprofessionals,  
15 subject to change from time to time, and all subject to application to, and approval by, this Court  
16 pursuant to Sections 330 and 331 of the Bankruptcy Code. The Application requests that the  
17 employment of the Firm be approved, *nunc pro tunc*, as of December 22, 2016.

18 The Trustee is a member of the Firm and regularly employs the Firm to represent  
19 bankruptcy estates in other unrelated bankruptcy cases in which she is the Trustee. The Trustee  
20 will not personally bill any legal fees in this case.

21 A copy of the Application, the *Declaration of Victoria L. Nelson In Support of the*  
22 *Application to Employ Nelson & Houmand, P.C., Nunc Pro Tunc, as General Bankruptcy*  
23 *Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a)*  
24 *and Federal Rule of Bankruptcy Procedure 2014*, and the *Declaration of Jacob L. Houmand, Esq.*  
25 *In Support of the Application to Employ Nelson & Houmand, P.C., Nunc Pro Tunc, as General*  
26 *Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a)*  
27 *and 328(a) and Federal Rule of Bankruptcy Procedure 2014* are on file with the Clerk’s Office of  
28 the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas,

1 Nevada 89101. Copies of the Application and any supporting declarations may also be obtained  
2 from counsel for the Trustee or through the Bankruptcy Court’s website at  
3 www.nvb.uscourts.gov.

4 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief  
5 sought in the Application, or if you want the Court to consider your views on the Application,  
6 then you must file an opposition with the Court, and serve a copy on the person making the  
7 Application *no later than fourteen (14) days preceding the hearing date for the Application*.

8 The opposition must state your position, set forth all relevant facts and legal authority, and  
9 be supported by affidavits or declarations that conform to Local Rule 9014(c).

10 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading  
11 with the court. You *must* also serve your written response on the person who sent you this  
12 notice.

13 If you do not file a written response with the court, or if you do not serve your written  
14 response on the person who sent you this notice, then:

- 15 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 16 • The Court may *rule against you* without formally calling the matter at the hearing.

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18 **NOTICE IS FURTHER GIVEN** that a hearing on said Application will be held before a  
19 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South,  
20 Second Floor, Courtroom No. 4, Las Vegas, Nevada on February 15, 2017, at 10:00 a.m.

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