

1 Kathy Bazoian Phelps, Esq. (CA Bar No. 155564)  
2 Email: kphelps@diamondmccarthy.com  
3 DIAMOND MCCARTHY LLP  
4 1999 Avenue of the Stars, Suite 1100  
5 Los Angeles, California 90067  
6 Telephone: 310/651-2997  
7 *Pro Hac Vice Application Pending*

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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

**EX PARTE APPLICATION FOR**  
**EXAMINATION OF THE PERSON**  
**MOST KNOWLEDGEABLE OF FIRST**  
**AMERICAN TITLE COMPANY**  
**PURSUANT TO FEDERAL RULE OF**  
**BANKRUPTCY PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley<sup>1</sup>

23 Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate  
24 by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local  
25

26 <sup>1</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11  
27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The  
28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of  
Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United  
States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

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

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3900 Paradise Road, Suite U, Las Vegas, Nevada 89169  
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA  
2 L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by  
3 and through her proposed counsel of record, Kathy Bazoian Phelps, Esq of the law firm of  
4 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of  
5 Nelson & Houmand, P.C., applies for an order directing the person most knowledgeable of First  
6 American Title Company (“FATC”) to appear for examination regarding any and all transactions  
7 concerning the acts, conduct, or property or to the liabilities and financial condition of ROBERT  
8 C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba LAWYERSWEST (the  
9 “Debtor”), any other matter which may affect the Debtor’s estate including, but not limited to, the  
10 purchase of the real property located at 5405 North 1530 West, St. George, Utah 84770 on or  
11 about March 7, 2006 (Escrow Number 265148-MW), and as to any matter permitted by Federal  
12 Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and  
13 marked as **Exhibit “1”**.

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