

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*

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

**EX PARTE APPLICATION FOR
EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF THE
CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST
OF LATTER-DAY SAINTS PURSUANT
TO FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley

Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by and through her proposed counsel of record, Kathy Bazoian Phelps, Esq of the law firm of

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

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

1 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of
2 Nelson & Houmand, P.C., applies for an order directing the person most knowledgeable of The
3 Corporation of the President of the Church of Jesus Christ of Latter-Day Saints (the “Church”) to
4 appear for examination regarding any and all transactions concerning the acts, conduct, or
5 property or to the liabilities and financial condition of ROBERT C. GRAHAM, LTD., fdba ROB
6 GRAHAM & ASSOCIATES fdba LAWYERSWEST (the “Debtor”), any other matter which
7 may affect the Debtor’s estate, including, but not limited to, all financial donations made to the
8 Church by the Debtor, Robert C. Graham, Esq. or Linda M. Graham, Esq., and as to any matter
9 permitted by Federal Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is
10 attached hereto and marked as **Exhibit “1”**.

11 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the
12 person most knowledgeable of the Church to appear for said examination on the 20th day of
13 January, 2017, at 4:00 p.m. at the law offices of Nelson & Houmand, P.C., 3900 Paradise Road,
14 Suite U, Las Vegas 89169-0903.

15 Dated this 4th day of January, 2017.

NELSON & HOUMAND, P.C.

By: /s/ Jacob L. Houmand
Jacob L. Houmand, Esq. (NV Bar # 12781)
Kyle J. Ortiz, Esq. (NV Bar # 14252)
3900 Paradise Road, Suite U
Las Vegas, Nevada 89169-0903
Telephone: 702/720-3370
Facsimile: 702/720-3371

—and—

DIAMOND MCCARTHY LLP

Kathy Bazoian Phelps, Esq. (CA Bar # 155564)
Email: kphelps@diamondmccarthy.com
1999 Avenue of the Stars, Suite 1100
Los Angeles, California 90067
Telephone: 310/651-2997

[Proposed] Counsel for Chapter 7 Trustee

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