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17 *[Proposed] Counsel for Chapter 7 Trustee*

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:
ROBERT C. GRAHAM, LTD. fdba ROB
GRAHAM & ASSOCIATES fdba
LAWYERSWEST,

Debtor.

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

EX PARTE APPLICATION FOR
EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF NEVADA
STATE BAR PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
2004

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

Judge: Honorable Bruce T. Beesley¹

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

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The 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”.

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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 the
6 Nevada State Bar (the “NV Bar”) 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, all
10 documents relating to referring to the Debtor, Robert C. Graham, Esq. or Linda M. Graham, Esq.,
11 and as to any matter permitted by Federal Rule of Bankruptcy Procedure 2004. A copy of the
12 Proposed Order is attached hereto and marked as **Exhibit “1”**.

13 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the
14 person most knowledgeable of the NV Bar to appear for said examination on the 20th day of
15 January, 2017, at 1:00 p.m. at the law offices of Nelson & Houmand, P.C., 3900 Paradise Road,
16 Suite U, Las Vegas 89169-0903.

17 Dated this 4th day of January, 2017.

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

19 By: /s/ Jacob L. Houmand
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26 —and—

27 **DIAMOND MCCARTHY LLP**

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