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7 *Pro Hac Vice Application Pending*

Electronically Filed On: January 4, 2017

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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 WFG
NATIONAL TITLE INSURANCE
COMPANY PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
2004

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

Judge: Honorable Bruce T. Beesley¹

22 Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate
23 by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local
24 Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA

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26 ¹ 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”.

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1 L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by
2 and through her proposed counsel of record, Kathy Bazoian Phelps, Esq of the law firm of
3 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of
4 Nelson & Houmand, P.C., applies for an order directing the person most knowledgeable of WFG
5 National Title Insurance Company (“WFG”) to appear for examination regarding any and all
6 transactions concerning the acts, conduct, or property or to the liabilities and financial condition
7 of ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba
8 LAWYERSWEST (the “Debtor”), any other matter which may affect the Debtor’s estate,
9 including, but not limited to, the complete file regarding Escrow No. 16-64914 which includes
10 copies of all checks, both front and back, and as to any matter permitted by Federal Rule of
11 Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and marked as
12 **Exhibit “1”**.

13 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the
14 person most knowledgeable of WFG to appear for said examination on the 23rd day of January,
15 2017, at 3:00 p.m. at the law offices of Nelson & Houmand, P.C., 3900 Paradise Road, Suite U,
16 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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