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7 *Pro Hac Vice Application Pending*

Electronically Filed On: January 10, 2017

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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-16-16655-BTB
Chapter 7

AMENDED EX PARTE APPLICATION
FOR EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF
CAPITAL ONE BANK (USA), N.A.
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 Diamond McCarthy, LLP and Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of

NELSON & HOUMAND, P.C.
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1 Nelson & Houmand, P.C., applies for an order directing the person most knowledgeable of
2 Capital One Bank (USA), N.A. (the “Bank”) to appear for examination regarding any and all
3 transactions concerning the acts, conduct, or property or to the liabilities and financial condition
4 of ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba
5 LAWYERSWEST (the “Debtor”), any other matter which may affect the Debtor’s estate,
6 including, but not limited to, all credit card accounts in the name of the Debtor, Robert C.
7 Graham, Esq. or Linda M. Graham, Esq., and as to any matter permitted by Federal Rule of
8 Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and marked as
9 **Exhibit “1”**.

10 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the
11 person most knowledgeable of the Bank to appear for said examination on the 26th day of
12 January, 2017, at 12:00 p.m. at the law offices of Nelson & Houmand, P.C., 3900 Paradise Road,
13 Suite U, Las Vegas 89169-0903.

14 Dated this 10th day of January, 2017.

NELSON & HOUMAND, P.C.

By: /s/ Jacob L. Houmand
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—and—

DIAMOND MCCARTHY LLP

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[Proposed] Counsel for Chapter 7 Trustee

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