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4 *Pro Hac Vice Application Pending*

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10 *[Proposed] Counsel for Chapter 7 Trustee*

12 **UNITED STATES BANKRUPTCY COURT**

13 **DISTRICT OF NEVADA**

14 In re:

15 ROBERT C. GRAHAM, LTD. fdba ROB  
16 GRAHAM & ASSOCIATES fdba  
LAWYERSWEST,

17 Debtor.

Case No. BK-S-16-16655-BTB  
Chapter 7

**AMENDED EX PARTE APPLICATION  
FOR EXAMINATION OF THE PERSON  
MOST KNOWLEDGEABLE OF  
EVERGREEN MONEYSOURCE  
MORTGAGE 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

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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”.

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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  
6 Evergreen Moneysource Mortgage Company (“EMMC”) to appear for examination regarding any  
7 and all transactions concerning the acts, conduct, or property or to the liabilities and financial  
8 condition of ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba  
9 LAWYERSWEST (the “Debtor”), any other matter which may affect the Debtor’s estate,  
10 including, but not limited to, a loan made to Robert C. Graham, Esq. on or about December 15,  
11 2016, regarding the purchase and financing of real property located at 1031 Fairbury Street,  
12 Henderson, NV 89052, and as to any matter permitted by Federal Rule of Bankruptcy Procedure  
13 2004. A copy of the Proposed Order is attached hereto and marked as **Exhibit “1”**.

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