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7 *Pro Hac Vice Application Pending*

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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-16-16655-BTB
Chapter 7

AMENDED EX PARTE APPLICATION
FOR EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF FIRST
AMERICAN TITLE COMPANY
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004

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

Judge: Honorable Bruce T. Beesley¹

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
25

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 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 First
6 American Title Company (“FATC”) 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, the
10 purchase of the real property located at 5405 North 1530 West, St. George, Utah 84770 on or
11 about March 7, 2006 (Escrow Number 265148-MW), and as to any matter permitted by Federal
12 Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and
13 marked as **Exhibit “1”**.

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WHEREFORE, the Trustee respectfully requests that this Honorable Court direct the person most knowledgeable of FATC to appear for said examination on the 26th day of January, 2017, at 2:00 p.m. at the law offices of Nelson & Houmand, P.C., 3900 Paradise Road, Suite U, Las Vegas 89169-0903.

Dated this 10th day of January, 2017.

NELSON & HOUMAND, P.C.

By: /s/ Jacob L. Houmand
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—and—

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