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10 **UNITED STATES BANKRUPTCY COURT**
 11 **DISTRICT OF NEVADA**

13 In re:
 14 Robert C. Graham, Ltd., F/D/B/A/ ROB
 15 Graham & Associates and Lawyerswest,

Case No.: BK-S-16-16655-BTB

**DECLARATION OF CHAD
 ZUPKE IN SUPPORT OF
 MOTION OF MARKEL
 INSURANCE COMPANY FOR
 RELIEF FROM STAY PURSUANT
 TO 11 U.S.C. 362 TO PROCEED IN
 NON-BANKRUPTCY FORUM**

Date: March 14, 2017
Time: 10:00 a.m.

22
 23 I, Chad Zupke, declare:


24 1. The following facts are personally known to me, and if called to testify
 25 thereto, I could and would do so, under oath.

26 2. I am a Senior Claims Examiner for Markel Service, Incorporated
 27 (“Markel Service”), the claim service manager for Markel Insurance Company
 28

1 (“MIC”), and make this Declaration in support of MIC’s Motion for Relief from Stay
2 filed herewith.

3 3. Since late December 2016, Markel Service has received notices from or
4 on behalf of approximately 390 individuals and/or entities which generally indicate
5 that such parties are aggrieved or potentially aggrieved former clients of Debtor. Such
6 notices refer to Mr. Graham’s alleged misappropriation of client funds and many note
7 possible claims against Robert C. Graham, Ltd. for legal malpractice and other
8 wrongdoing arising therefrom.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct. Executed February 6, 2017 in
11 Deerfield, Illinois.

12
13 
14 _____
Chad Zupke