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1 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
Email: jhoumand@nelsonhoumand.com  
2 Kyle J. Ortiz, Esq. (NV Bar No. 14252)  
Email: kortiz@nelsonhoumand.com  
3 NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
4 Las Vegas, Nevada 89169-0903  
Telephone: 702/720-3370  
5 Facsimile: 702/720-3371

6 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*

7  
8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10 In re:  
11 ROBERT C. GRAHAM, LTD. fdba ROB  
12 GRAHAM & ASSOCIATES fdba  
13 LAWYERSWEST,

14 Debtor.

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

**DECLARATION OF VICTORIA L. NELSON IN SUPPORT OF NOTICE OF NO OPPOSITION TO NEGATIVE NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY PURSUANT TO 11 U.S.C. § 554**

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

Judge: Honorable Bruce T. Beesley<sup>1</sup>

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16  
17  
18 I, VICTORIA L. NELSON, declare as follows:

19 1. I am over the age of 18 years and I am competent to make this declaration. I have  
20 personal knowledge of the facts set forth herein, except for those facts stated on information and  
21 belief, and, as to those facts, I am informed and believe them to be true. If called as a witness, I  
22 could and would testify as to the matters set forth below based upon my personal knowledge.

23 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

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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".

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169  
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

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3900 Paradise Road, Suite U, Las Vegas, Nevada 89169  
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 3. I make this declaration in support of the *Negative Notice Trustee’s Intent to*  
2 *Abandon Property Pursuant to 11 U.S.C. § 554* (the “Notice”).<sup>2</sup>

3 4. On December 15, 2016, an *Involuntary Bankruptcy Petition* [ECF No. 1]<sup>3</sup> (the  
4 “Involuntary Petition”) was filed against ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM &  
5 ASSOCIATES fdba LAWYERSWEST (the “Debtor”) pursuant to 11 U.S.C. § 303. The  
6 Involuntary Petition was filed by the Estate of Michael B. Macknin, the Sharona Dagani Trust,  
7 and the Margueritte Owens Revocable Trust (collectively, the “Petitioning Creditors”).

8 5. On December 16, 2016, the Petitioning Creditors filed a *Motion to Appoint Interim*  
9 *Trustee in Involuntary Case* [ECF No. 3] (the “Interim Trustee Motion”), which sought authority  
10 to appoint an interim trustee to take possession of property and to manage the business operations  
11 and assets of the Debtor.

12 6. On December 21, 2016, the Bankruptcy Court entered an *Order on Trustee Motion*  
13 *and Order for Relief under Chapter 7* [ECF No. 21] (the “Order for Relief”). The Order for Relief  
14 provided that the Debtor had consented to the filing of a bankruptcy petition and that the filing of  
15 the bankruptcy case was effective as of December 15, 2016 (the “Petition Date”). The Order for  
16 Relief further required that the Office of the United States Trustee (the “U.S. Trustee”) appoint an  
17 Interim Chapter 7 Trustee pursuant to 11 U.S.C. § 701.

18 7. On December 22, 2016, I was appointed as the Chapter 7 Trustee in the Debtor’s  
19 bankruptcy case [ECF No. 22].

20 8. On or about January 9, 2017, Steven Holland, bankruptcy counsel for Linda  
21 Graham, provided me with photographs and an inventory of all the personal property at the  
22 Debtor’s Colorado Office located at 2720 Council Tree Ave, Suite 242, Fort Collins, Colorado  
23 80528.

24 ...

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26 <sup>2</sup> Unless otherwise expressly stated herein, all undefined, capitalized terms shall have the meaning  
27 ascribed to them in the Notice.

28 <sup>3</sup> All references to “ECF No.” are to the numbers assigned to the documents filed in the above-  
referenced case as they appear on the docket maintained by the clerk of the court.

