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*Bruce T Beesley*

Honorable Bruce T. Beesley  
United States Bankruptcy Judge



Entered on Docket  
March 20, 2017

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Attorneys for Markel Insurance Company

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

In re:

ROBERT C. GRAHAM, LTD  
FDBA ROB GRAHAM & ASSOCIATES  
FDBA LAWYERS WEST

Case No.: BK-S-16-16655-BTB  
(Chapter 7)

**ORDER GRANTING MOTION OF  
MARKEL INSURANCE COMPANY  
FOR RELIEF FROM STAY PURSUANT  
TO 11 U.S.C. 362 TO PROCEED IN NON-  
BANKRUPTCY FOURM**

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

1 The Court having considered the motion of Markel Insurance Company (“MIC”) for Relief  
2 from Stay Pursuant To 11 U.S.C. 362 to Proceed in Non-Bankruptcy Forum [Docket # 169] (the  
3 “Motion”), Candace C. Carlyon, Esq. and Nicholas M. Wieczorek, Esq. of Morris Polich & Purdy,  
4 LLP having appeared on behalf of MIC; Samuel A. Schwartz, Esq. of the law firm of Schwartz  
5 Flansburg, PLLC appearing on behalf of the Trustee, Victoria L. Nelson; and other appearances  
6 having been noted on the record; and upon considering the Motion and the related pleadings; and  
7 upon the stipulation of the parties; and good cause appearing:

8 **IT IS HEREBY ORDERED THAT** the Motion be granted.

9  
10 **IT IS FURTHER HEREBY ORDERED THAT** MIC may proceed in an appropriate non-  
11 bankruptcy forum with an action for declaratory relief and to rescind the MIC Lawyers Professional  
12 Liability Insurance Policy issued to the Debtor, Robert C. Graham, Ltd., including naming the  
13 Debtor in such action.

14 \*\*\*

15 Submitted by:

16 **MORRIS POLICH & PURDY LLP**

17 By: 

18 CANDACE C. CARLYON, ESQ.  
19 Nevada Bar No. 02666  
20 3800 Howard Hughes Pkwy., Suite 500  
21 Las Vegas, Nevada 89169  
22 Attorneys for Markel Insurance Company

23 Approved:

24 **SCHWARTZ FLANSBURG PLLC**

25 /s/ Samuel A. Schwartz  
26 Samuel A. Schwartz, Esq.  
27 Nevada Bar No. 10985  
28 Schwartz Flansburg PLLC  
6623 Las Vegas Blvd South, Suite 300  
Las Vegas, NV 89119  
Proposed Special Counsel for the Trustee, Victoria L. Nelson

RULE 9021 DECLARATION

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the Court's ruling and that:


The court has waived the requirement of approval under LR 9021(b)(1).

No party appeared at the hearing or filed an objection to the motion.

I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved the order, or waived signature.

I certify that this is a case under Chapter 7 or 13, that I served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

I declare under penalty of perjury that the foregoing is true and correct.

By:   
CANDACE C. CARLYON, ESQ.  
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