

1 Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
2 Kyle J. Ortiz, Esq. (NV Bar No. 14252)
Email: kortiz@houmandlaw.com
3 HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240
4 Las Vegas, NV 89148
Telephone: 702/720-3370
5 Facsimile: 702/720-3371

Electronically Filed On: December 13, 2017

6 *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
LAWYERSWEST,

13 Debtor.

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

**EX PARTE APPLICATION FOR
EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF CITY
NATIONAL BANK, N.A. PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley¹

14
15
16
17
18
19 Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate
20 by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local
21 Rules of Practice for the United States Bankruptcy Court for the District of Nevada, VICTORIA
22 L. NELSON, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by
23 and through her counsel of record, Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the
24 Houmand Law Firm, Ltd. applies for an order directing the person most knowledgeable of City
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”.

HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 National Bank, N.A. (the “Bank”) to appear for examination regarding any and all transactions
2 concerning the acts, conduct, or property or to the liabilities and financial condition of ROBERT
3 C. GRAHAM, LTD., fdba ROB GRAHAM & ASSOCIATES fdba LAWYERSWEST (the
4 “Debtor”), any other matter which may affect the Debtor’s estate, including, but not limited to, all
5 correspondence concerning the Debtor’s IOLTA Account, and as to any matter permitted by
6 Federal Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto
7 and marked as **Exhibit “1”**.

8 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the
9 person most knowledgeable of the Bank to appear for said examination on the 29th day of
10 December, 2017, at 12:00 p.m. at the offices of Houmand Law Firm, Ltd., 9205 West Russell
11 Road, Building 3 Suite 240, Las Vegas, Nevada 89148.

12 Dated this 13th day of December, 2017.

13 **HOUMAND LAW FIRM, LTD.**

14
15 By: /s/ Kyle J. Ortiz

16 Jacob L. Houmand, Esq. (NV Bar No. 12781)
17 Kyle J. Ortiz, Esq. (NV Bar No. 14252)
18 9205 West Russell Road, Building 3, Suite 240
19 Las Vegas, NV 89148
20 Telephone: 702/720-3370
21 Facsimile: 702/720-3371

22
23
24
25
26
27
28 *Counsel for Victoria L. Nelson,
Chapter 7 Trustee*