

Electronically Filed On: March 21, 2018

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

ROBERT C. GRAHAM, LTD. fdba ROB
GRAHAM & ASSOCIATES fdba
LAWYERSWEST,

Debtor.

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

**EX PARTE APPLICATION FOR
EXAMINATION OF THE PERSON
MOST KNOWLEDGEABLE OF ALLEN
ADVERTISING, INC. PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley¹

Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate by reference Rule 45 of the Federal Rules of Civil Procedure, and Rule 5075(a)(2)(L) of the Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada, Shelley D. Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by and through her counsel of record, Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the Houmand Law Firm, Ltd., applies for an order directing the person most knowledgeable of Allen

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The 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 Advertising, Inc. to appear for examination regarding any and all transactions concerning the acts,
2 conduct, or property or to the liabilities and financial condition of ROBERT C. GRAHAM, LTD.
3 fdba ROB GRAHAM & ASSOCIATES fdba LAWYERSWEST (the “Debtor”), any other matter
4 which may affect the Debtor’s estate, including, but not limited to, any payments made by the
5 Debtor and/or Robert C. Graham to Allen Advertising, Inc., 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 Allen Advertising, Inc. to appear for said examination on the 5th
10 day of April, 2018, at 12:00 p.m. at the offices of the Houmand Law Firm, Ltd., 9205 West
11 Russell Road, Building 3, Suite 240, Las Vegas, NV 89148.

12 Dated this 21st day of March, 2018.

13 **HOUAMAND LAW FIRM, LTD.**

14
15 By: /s/ Kyle J. Ortiz
16 Jacob L. Houmand, Esq. (NV Bar No. 12781)
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22 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March, 2018, I caused to be served a true and correct copy of EX PARTE APPLICATION FOR EXAMINATION OF THE PERSON MOST KNOWLEDGEABLE OF ALLEN ADVERTISING, INC. PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 in the following manner:

(ECF System) By electronically filing a copy of the above-referenced document with the Clerk of the Court for the United States Bankruptcy Court for the District of Nevada via the ECF System. The ECF Confirmation Sheet provides that the following parties were served with the above-referenced document:

ROBERT ATKINSON on behalf of Creditor BRIAN D. SHAPIRO, TRUSTEE
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5 I declare under penalty of perjury of the laws of the United States that the foregoing is true
6 and correct.

7 Dated this 21st day of March, 2018.

8 **HOUMAND LAW FIRM, LTD.**

9 By: /s/ Kyle J. Ortiz

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