

EXHIBIT “1”

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PROPOSED ORDER

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General Bankruptcy Counsel for Shelley D. Krohn, Chapter 7 Trustee

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

[PROPOSED] ORDER GRANTING EX PARTE APPLICATION TO EMPLOY DIAMOND MCCARTHY LLP, NUNC PRO TUNC, AS SPECIAL LITIGATION COUNSEL FOR SHELLEY D. KROHN, SUCCESSOR CHAPTER 7 TRUSTEE PURSUANT TO 11 U.S.C. §§ 327(a) AND 328(A) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014

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

Judge: Honorable Bruce T. Beesley

This matter came before this Court on the *Ex Parte Application to Employ Diamond McCarthy LLP, Nunc Pro Tunc, As Special Litigation Counsel for Shelley D. Krohn, Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy*

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1 *Procedure 2014* (the “Application”) [ECF No. ___]¹, filed by Shelley D. Krohn, the successor
2 chapter 7 trustee in the above-captioned bankruptcy case (the “Trustee”), by and through her
3 general bankruptcy counsel of record, Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the
4 Houmand Law Firm, Ltd.² The Application sought authority to employ Diamond McCarthy,
5 LLP, *nunc pro tunc*, as special litigation counsel pursuant to 11 U.S.C. §§ 327(a) and 328(a) and
6 Federal Rule of Bankruptcy Procedure 2014.

7 The Court reviewed the Application, the *Declaration of Kathy Bazoian Phelps, Esq. In*
8 *Support of Ex Parte Application to Employ Diamond McCarthy LLP, Nunc Pro Tunc, As Special*
9 *Litigation Counsel for Shelley D. Krohn, Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§*
10 *327(a) and 328(a) and Federal Rule of Bankruptcy Procedure 2014* [ECF No. ___], the
11 *Declaration of Shelley D. Krohn In Support of Ex Parte Application to Employ Diamond*
12 *McCarthy LLP, Nunc Pro Tunc, As Special Litigation Counsel for Shelley D. Krohn, Successor*
13 *Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy*
14 *Procedure 2014* [ECF No. ___], the *Certificate of Service of Ex Parte Application to Employ*
15 *Diamond McCarthy LLP, Nunc Pro Tunc, As Special Litigation Counsel for Shelley D. Krohn,*
16 *Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of*
17 *Bankruptcy Procedure 2014* [ECF No. ___], the exhibits attached thereto, and all of the papers on
18 file herein.

19 Based upon this review and good cause appearing,

20 **IT IS HEREBY ORDERED** that:

- 21 (1) The Application is **GRANTED** in its entirety; and
- 22 (2) The Trustee appointed in the above-referenced bankruptcy case is hereby
23 authorized pursuant to 11 U.S.C. §§ 327(a) and 328(a) and the Federal Rule of Bankruptcy
24 Procedure 2014 to employ Diamond McCarthy LLP as special counsel effective as of the date of

25 _____

26 ¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the case as
27 they appear on the docket maintained by the clerk of the court.

28 ² All defined terms in this Order shall have the same meaning ascribed to them in the Application
unless otherwise provided herein.

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1 her appointment as successor trustee; and

2 (3) The terms of such employment shall be as described in the Application and in the
3 supporting Verified Statement of Kathy Bazoian Phelps, Esq.; and

4 (4) Such terms of employment are approved as reasonable in accordance with 11
5 U.S.C. §§ 328 and 330; and

6 (5) Any compensation and reimbursement of expenses are to be awarded by Court
7 order and are to be paid as an administrative expense after notice and a hearing, in accordance
8 with 11 U.S.C. §§ 330 and 503, or surcharged against secured property in accordance with 11
9 U.S.C. § 506(c), if appropriate.

10 **IT IS SO ORDERED.**

11 Prepared and Submitted By:

12 **HOUAND LAW FIRM, LTD.**

13 By: _____
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15 Kyle J. Ortiz, Esq. (NV Bar No. 14252)
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17 *General Bankruptcy Counsel for Shelley D. Krohn, Chapter 7 Trustee*

18 **Approved As to Form and Content**

19 **OFFICE OF THE UNITED STATES TRUSTEE**

20 By: _____
21 Trial Attorney
22 United States Department of Justice
23 Office of the United States Trustee
Region 17; Las Vegas Field Office
300 Las Vegas Blvd. South, Suite 4300
Las Vegas, NV 89101

24 *Counsel for Tracy Hope Davis, Region 17 United States Trustee*

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