

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 EISNERAMPER LLP AS FORENSIC ACCOUNTANT, NUNC PRO TUNC, 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 EisnerAmper LLP As Forensic Accountant, Nunc Pro Tunc 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* (the

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

6 The Court reviewed the Application, the *Declaration of Hubert Klein, CPA. In Support of*
7 *Ex Parte Application to Employ EisnerAmper LLP As Forensic Accountant, Nunc Pro Tunc for*
8 *Shelley D. Krohn, Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and*
9 *Federal Rule of Bankruptcy Procedure 2014* [ECF No. ____], the *Declaration of Shelley D. Krohn*
10 *In Support of Ex Parte Application to Employ EisnerAmper LLP As Forensic Accountant, Nunc*
11 *Pro Tunc for Shelley D. Krohn, Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a)*
12 *and 328(a) and Federal Rule of Bankruptcy Procedure 2014* [ECF No. ____], the *Certificate of*
13 *Service of Ex Parte Application to Employ EisnerAmper LLP As Forensic Accountant, Nunc Pro*
14 *Tunc for Shelley D. Krohn, Successor Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and*
15 *328(a) and Federal Rule of Bankruptcy Procedure 2014* [ECF No. ____], the exhibits attached
16 thereto, and all of the papers on file herein.

17 Based upon this review and good cause appearing,

18 **IT IS HEREBY ORDERED** that:

- 19 (1) The Application is **GRANTED** in its entirety; and
20 (2) The Trustee appointed in the above-referenced bankruptcy case is hereby
21 authorized pursuant to 11 U.S.C. §§ 327(a) and 328(a) and the Federal Rule of Bankruptcy
22 Procedure 2014 to employ EisnerAmper LLP as forensic accountant effective as of the date of her
23 appointment as successor trustee; and

24 . . .

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 (3) The terms of such employment shall be as described in the Application and in the
2 supporting Verified Statement of Hubert Klein, CPA.; and

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

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

9 **IT IS SO ORDERED.**

10 Prepared and Submitted By:

11 **HOUAND LAW FIRM, LTD.**

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

20 **Approved As to Form and Content**

21 **OFFICE OF THE UNITED STATES TRUSTEE**

22 By: _____
23 Trial Attorney
24 United States Department of Justice
25 Office of the United States Trustee
26 Region 17; Las Vegas Field Office
27 300 Las Vegas Blvd. South, Suite 4300
28 Las Vegas, NV 89101

Counsel for Tracy Hope Davis, Region 17 United States Trustee

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