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Electronically Filed On: May 21, 2018

6 *General Bankruptcy Counsel for Shelley D. Krohn, 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,

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

STIPULATION TO AMEND PROOF OF CLAIM 59

13 Debtor.

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

Judge: Honorable Bruce T. Beesley¹

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15
16 Shelley D. Krohn, the duly appointed Chapter 7 Trustee in the above-captioned
17 bankruptcy case (the "Trustee"), by and through her counsel Jacob L. Houmand, Esq. and Kyle J.
18 Ortiz, Esq. of the Houmand Law Firm, Ltd., and Kristine K. Zimmerman, Administrator of the
19 Estate of Carol K. Lilly (the "Estate"), by and through her counsel of record, Stephanie Hartman
20 Rojo, Esq. of the Stone Law Offices (the Trustee and the Estate shall be collectively referred to
21 herein as the "Parties"), hereby stipulate and agree as follows:

22 ...
23 ...
24 ...

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".

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I. RECITALS

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2 1. On December 15, 2016, an *Involuntary Bankruptcy Petition* [ECF No. 1]² (the
3 “Involuntary Petition”) was filed against ROBERT C. GRAHAM, LTD., fdba ROB GRAHAM &
4 ASSOCIATES fdba LAWYERSWEST (the “Debtor”) pursuant to 11 U.S.C. § 303. The
5 Involuntary Petition was filed by the Estate of Michael B. Macknin, the Sharona Dagani Trust,
6 and the Margueritte Owens Revocable Trust (collectively, the “Petitioning Creditors”).

7 2. On December 16, 2016, the Petitioning Creditors filed a *Motion to Appoint Interim*
8 *Trustee in Involuntary Case* [ECF No. 3] (the “Interim Trustee Motion”), which sought authority
9 to appoint an interim trustee to take possession of property and to manage the business operations
10 and assets of the Debtor.

11 3. On December 21, 2016, the Bankruptcy Court entered an *Order on Trustee Motion*
12 *and Order for Relief Under Chapter 7* [ECF No. 21] (the “Order for Relief”). The Order for
13 Relief provided that the Debtor had consented to the filing of a bankruptcy petition and that the
14 filing of the bankruptcy case was effective as of December 15, 2016 (the “Petition Date”). The
15 Order for Relief further required that the Office of the United States Trustee (the “U.S. Trustee”)
16 appoint an Interim Chapter 7 Trustee pursuant to 11 U.S.C. § 701.

17 4. On December 22, 2016, Victoria L. Nelson (“Trustee Nelson”) was appointed as
18 the Chapter 7 Trustee in the Debtor’s bankruptcy case [ECF No. 22].

19 5. On January 26, 2017, the Court scheduled the Debtor’s 341(a) Meeting of
20 Creditors and established June 8, 2017, as the deadline for creditors to file proofs of claim.

21 6. On June 5, 2017, the Estate filed a proof of claim [Claim 59] in the Debtor’s
22 bankruptcy case.

23 7. On June 6, 2017, the Estate filed an amended proof of claim [59-2] (the “Amended
24 Claim”).

25 8. On January 19, 2018, the Trustee was appointed as the successor Chapter 7 Trustee
26 in the Debtor’s bankruptcy case.

27
28 ² All references to “ECF No.” are to the numbers assigned to the documents filed in the above-
referenced case as they appear on the docket maintained by the clerk of the court.

9. The Estate now desires to amend the Amended Claim in order to change the beneficiaries to the following:

	NAME	AMOUNT
1.	Mark Kanter	\$433,967.76
2.	Kristine K. Zimmermann	\$370,367.75
3.	Inheritance Funding Company, Inc. (Kristine Zimmermann's Assignment)	\$63,600.00
4.	State Bar of Nevada (Mark Kanter's Subrogation)	\$25,000.00
5.	State Bar of Nevada (Kristine K. Zimmermann's Subrogation)	\$25,000.00
	TOTAL	\$917,935.51

II. STIPULATION

IT IS HEREBY STIPULATED AND AGREED that the Amended Claim shall be divided into several smaller sub-claims as follows:

	NAME	AMOUNT
1.	Mark Kanter	\$433,967.76
2.	Kristine K. Zimmermann	\$370,367.75
3.	Inheritance Funding Company, Inc. (Kristine Zimmermann's Assignment)	\$63,600.00
4.	State Bar of Nevada (Mark Kanter's Subrogation)	\$25,000.00
5.	State Bar of Nevada (Kristine K. Zimmermann's Subrogation)	\$25,000.00
	TOTAL	\$917,935.51

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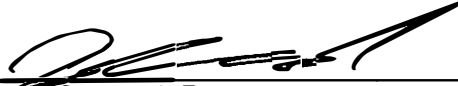
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IT IS FURTHER HEREBY STIPULATED AND AGREED that this Stipulation is without prejudice to any of the Parties requesting a further amendment of the Amended Claim.

Dated this 21~~st~~ day of May, 2018. Dated _____ th day of _____, 2018.

By: 
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Kyle J. Ortiz, Esq.
(NV Bar No. 14252)
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Counsel for Shelley D. Krohn, Chapter 7 Trustee

By: _____
S. Craig Stone II, Esq.
(NV Bar No. 5140)
Stephanie Hartman Rojo, Esq.
(NV Bar No. 13944)
Stone Law Office, Ltd.
3295 N. Fort Apache Road, Suite 150
Las Vegas, Nevada 89129
Counsel for Kristine K. Zimmerman, Administrator of the Estate of Carol K. Lilly

Dated 30 th day of April, 2018.

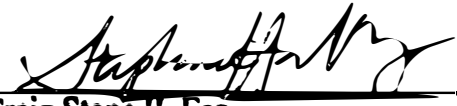
By: 
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Counsel for State Bar of Nevada

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1 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that this Stipulation is
2 without prejudice to any of the Parties requesting a further amendment of the Amended Claim.

3
4 Dated this _____ th day of _____, 2018. Dated 3rd ~~th~~ day of May, 2018.

5
6
7 By: _____
8 Jacob L. Houmand, Esq.
9 (NV Bar No. 12781)
10 Kyle J. Ortiz, Esq.
11 (NV Bar No. 14252)
12 Houmand Law Firm, Ltd.
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16 *Counsel for Shelley D. Krohn, Chapter 7*
17 *Trustee*

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Counsel for Kristine K. Zimmerman,
Administrator of the Estate of Carol K. Lilly

18 Dated _____ th day of _____, 2018.

19 By: _____
20 Rew R. Goodenow, Esq.
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22 Parsons Behle & Latimer
23 50 West Liberty Street, Suite 750
24 Reno, NV 89051
25 *Counsel for State Bar of Nevada*

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