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*Electronically Filed On: October 10, 2018*

6 *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  
13 LAWYERSWEST,  
14 Debtor.

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

**EX PARTE APPLICATION FOR  
EXAMINATION OF THE PERSON  
MOST KNOWLEDGEABLE OF FIA  
CARD SERVICES, N.A. PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2004**

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

Judge: Honorable Bruce T. Beesley<sup>1</sup>

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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, Shelley D.  
22 Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding ("Trustee"), by and  
23 through her counsel of record, Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the Houmand  
24 Law Firm, Ltd., applies for an order directing the person most knowledgeable of FIA Card  
25 Services, N.A. ("FIA") to appear for examination regarding any and all transactions concerning

26 <sup>1</sup> 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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the acts, conduct, or property or to the liabilities and financial condition of Robert C. Graham, Ltd. fdba Rob Graham & Associates fdba Lawyerswest (the “Debtor”), any other matter which may affect the Debtor’s estate, including, but not limited to, credit cards issued in the name of the Debtor or its principal, and as to any matter permitted by Federal Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto and marked as **Exhibit “1”**.

**WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct the person most knowledgeable of FIA to appear for said examination on the 26th day of October, 2018, at 9:30 a.m. at the offices of the Houmand Law Firm, Ltd., 9205 West Russell Road, Building 3, Suite 240, Las Vegas, NV 89148.

Dated this 10th day of October, 2018.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of October, 2018, I caused to be served a true and correct copy of EX PARTE APPLICATION FOR EXAMINATION OF THE PERSON MOST KNOWLEDGEABLE OF FIA CARD SERVICES, N.A. 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:

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7 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
8 and correct.

9 Dated this 10th day of October, 2018.

10 **HOUMAND LAW FIRM, LTD.**

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