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8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF WASHINGTON**

10 In re:

11 GIGA WATT, Inc., a Washington  
12 corporation,

13 Debtor.

14 MARK D. WALDRON, in his capacity  
15 as the duly-appointed Chapter 11  
16 Trustee,

17 vs.

18 DAVID M. CARLSON and JANE  
19 DOE 1, individually and on behalf of  
20 the marital estate, ENTERPRISE  
21 FOCUS, INC., a Washington  
22 corporation, CLEVER CAPITAL,  
23 LLC, a Washington LLC, JEFFREY  
24 FIELD, ROB TAVIS, JOHN DOES 1  
25 THROUGH 15

Case No. 18-03197

The Honorable Frederick P. Corbit

Chapter 11

Adv. P. No. 19-80012

**NOTICE OF CHAPTER 11  
TRUSTEE'S MOTION FOR  
EXPEDITED DISCOVERY;  
EXPEDITED CONSIDERATION  
THEREOF**

1           **PLEASE TAKE NOTICE** that Mark D. Waldron, in his capacity as the  
2 duly appointed Chapter 11 trustee (“**Trustee**”) in the bankruptcy case of the  
3 above-captioned debtor, has respectfully moved (the “**Motion**”)<sup>1</sup> for entry of an  
4 order expediting discovery in the above-captioned adversary proceeding.

5           **PLEASE TAKE FURTHER NOTICE** that by the Motion, the Trustee is  
6 requesting permission to conduct certain discovery immediately. Depositions may  
7 occur on two (2) calendar days’ notice. Document production may be demanded  
8 on two (2) calendar days’ notice. The Trustee may contact the TNT Landlord and  
9 Red Team Investments, Inc. to coordinate expedited discovery. Discovery notices  
10 and production demands may be served by email.

11           **PLEASE TAKE FURTHER NOTICE** that the Motion and any supporting  
12 papers, may be obtained from the Clerk of the above-captioned Court.

13           **PLEASE TAKE FURTHER NOTICE** that the Trustee is asking for  
14 expedited consideration of the Motion. Expedited consideration is necessary  
15 because a show cause hearing is set for May 23, 2019 and the Trustee has not  
16 been able to reach the Defendants to confer regarding discovery, despite the fact  
17 that on April 25, 2019, pursuant to the *Order to Show Cause for Preliminary*  
18 *Injunction and Temporary Restraining Order*, as amended on April 30, 2019, the  
19 parties were order to “immediately confer regarding the scope and scheduling of  
20 discovery.” [AP Docket No. 11 and AP Docket No. 19]

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23 <sup>1</sup> Unless otherwise defined herein, capitalized terms in this Notice have the  
meanings ascribed to them in the Motion.

1 If you oppose the Motion, including expedited consideration thereof, then by  
2 **FRIDAY, MAY 10, 2019 at 12:00 P.M., PACIFIC TIME**, you must file your  
3 written response with the Court Clerk, U.S. Bankruptcy Court, Eastern District of  
4 Washington, 904 West Riverside Ave., Suite 304, Spokane, WA 99201 or, if by  
5 mail, the Court Clerk, U.S. Bankruptcy Court, Eastern District of Washington,  
6 P.O. Box 2164, Spokane, WA 99210-2164 and serve a copy upon (1) undersigned  
7 counsel at CKR Law LLP, 506 Second Ave., 14th Floor, Seattle, WA 98114 and  
8 (2) James Perkins, Office of The United States Trustee, 920 West Riverside  
9 Avenue, Suite 593, Spokane, WA 99201-1012.

10 **PLEASE TAKE FURTHER NOTICE** that the Court may enter an order  
11 without an actual hearing or further notice unless a written objection is timely  
12 served and filed. If an objection is timely served and filed, you will receive notice  
13 of the date and time of a hearing on your objection.

14 **DATE OF SERVICE: MAY 9, 2019**

15 Dated: May 9, 2019

CKR LAW LLP

17 */s/ Pamela M. Egan*

18 Pamela M. Egan

19 *Attorneys for Mark D. Waldron,*  
20 *Chapter 11 Trustee*