

1 TARA D. NEWBERRY, ESQ.
2 Nevada Bar No. 10696
3 CONNAGHAN NEWBERRY LAW FIRM
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9 *Attorney for Unsecured Creditors*

7 **UNITED STATES BANKRUPTCY COURT**
8 **DISTRICT OF NEVADA**

9 In Re:) Case No: 15-101110-led
10) Chapter: 7
11)
12 AMERI-DREAM REALTY, LLC,) Trustee: Victoria L. Nelson
13)
14)

14 **JOINDER AND REQUEST TO INCLUDE ADDITIONAL PROPERTY MANAGEMENT**
15 **AGREEMENTS IN OMNIBUS MOTION OF THE CHAPTER 7 TRUSTEE FOR ENTRY**
16 **OF ORDER AUTHORIZING THE REJECTION OF EXECUTORY CONTRACTS**
17 **PURSUANT TO 11 U.S.C. § 365(a)**

17 Creditors, CHRISTINA YING DENG, CHEN ZHAO, JAMES K C LAM, XIA JING,
18 PHYLLIS LA, JOE HUAYUE ZHOU, DORA DONGXIA QIU, YONG QIN LU, AILEEN
19 LUM LU, NING LI, MUOI LOI, LOUI LUU, CHI KEONG NG, JAMES LUI, JIAN HONG
20 CHEN, JEANNIE C UNG, DAVID BAUDOIN, ALFRED HONG CHAN, LAN SUI ZENG,
21 HOWARD CHEN, SUSAN LIANG, RICKY KONG, SOPHIE LUO SHEN, AKINWUNMI
22 AKINYEMI, MELVIN CHEN, HU ZHAOMING, RUI ZHI WU, KANG CHAO CHIA, YING
23 CHIAO, HUANG GIACHUAN, ZHIPING CHEN, RAIMUNDO CANAS, WEI TZE T CHEN,
24 VINCA FAMILY LIMITED PARTNERSHIP, by and through their counsel of record, Tara D.
25 Newberry Esq., of the law firm of Connaghan | Newberry Law Firm , hereby files this Joinder
26 and Request to Include Additional Property Management Agreements in Omnibus Motion of the
27 Chapter 7 Trustee for Entry of Order Authorizing Rejection of Executory Contracts Pursuant to
28 11 U.S.C. § 365(a). (the “Motion”)

1 On or about February 5, 2015, the Chapter 7 Trustee, Victoria Nelson, (the "Trustee")
2 filed the Motion and included multiple Property Management Agreements for the court to
3 authorize rejection. The creditors identified herein, join in the Motion, however, request the
4 court, based upon the pleadings and declarations on file in this matter, also include those
5 property management agreements identified below in the order requested by the Trustee:

6 **Christina Ying Deng, Chen Zhao**

7 10825 Armitage Ave

8 5998 Banbury Heights

9 8490 Faucet Ave

10 1013 Olive Mill Lane

11 10537 White Heath Ct

12 **James K C Lam, Xia Jing**

13 4768 Bow Canyon

14 **Phyllis La**

15 6055 Devers Ct

16 **Joe Huayue Zhou, Dora Dongxia Qiu** 328 Emerald Vista Way

17 800 Jacobs Ladder Pl

18 **Yong Qin Lu, Aileen Lum**

19 8327 Golden Cypress Ave

20 **Ning Li**

21 5055 W Hacienda Ave

22 **Chen Zhao, Ying Deng**

23 8065 Kings Ransom St

24 2917 Matterhorn Way

25 **Muoi Loi, Loui Luu**

26 7467 Mission Palm St

27 10544 Music Ave

28 **Chi Keong Ng**

10080 Pacific Peak S

1 **James Lui**

2 7910 Palace Monaco

3 **James K Lan**

4 7445 S Pioneer Way

5 **Jian Hong Chen, Jeannie C Ung**

6 7641 Ribbon Garland Ct

7 **David Baudoin**

8 8981 Rivers Edge Dr

9 **Alfred Hong Chan**

10 9582 Sage Sparrow Ave

11 **Lan Sui Zeng**

12 1099 Snow Roof Ave

13 2433 Twin Flower Cr

14 **Howard Chen, Susan Liang**

15 7065 Tara Ave

16 **Ricky Kong**

17 3962 Duero Way

18 **Sophie Luo Shen**

19 10909 Desert Dove Ave

20 **Akinwunmi Akinyemi William**

21 5207 Shreve Ave

22 **Melvin Chen**

23 5080 Indian River

24 **Hu Zhaoming**

25 601 Brinkhamburn Pointe Ave

26 **Rui Zhi Wu**

27 1080 Harpy Eagle Ave

28 **Kang Chao Chia, Ying Chiao**

2624 Amarillo St

1 1300 Cashman Dr.

2 **Huang Giachuan**

3 6017 Falconer Ave

4 **Zhiping Chen**

5 2701 Sun Cactus

6 **Raimundo Canas**

7 6017 Granada Ave

8 **Wei Tze T Chen**

9 9425 Tournament Canyon Dr

10 **Vinca Family Limited Partnership**

11 10689 Harvest Green Way

12 DATED this 16th day of February, 2015.

13 Respectfully Submitted:

14 CONNAGHAN NEWBERRY

15 /s/ Tara D. Newberry
16 TARA D. NEWBERRY, ESQ.
17 Nevada Bar No. 10696
18 7854 W. Sahara Ave.
19 Las Vegas, Nevada 89117
20 Attorney for Unsecured Creditors
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CERTIFICATE OF SERVICE

- 1 1. On February 16, 2015, I served the following documents:
2 a. Notice of Appearance and Request for Special Notice
3 2. I served the above named document(s) by the following means to the
4

5 persons as listed below:

6 X a. **ECF System.**

7 RICHARD F. HOLLEY on behalf of Creditor HOMEOWNERS GROUP OF 28
8 rholley@nevadafirm.com, sdwkhtecf@gmail.com;oatamoh@nevadafirm.com
9 oswibies@nevadafirm.com;apestonit@nevadafirm.com

10 JACOB L. HOUMAND on behalf of Trustee VICTORIA NELSON
11 jhoumand@nelsonhoumand.com
12 vnelson@nelsonhoumand.com;cjorvig@nelsonhoumand.com;nalcantara@nelsonhoumand.com

13 VICTORIA NELSON
14 trustee@nelsonhoumand.com, cjorvig@nelsonhoumand.com
15 vln@trustesolutions.net;nalcantara@nelsonhoumand.com;nv29@ecfcbis.com

16 AMANDA M. PERACH on behalf of Debtor AMERI-DREAM REALTY LLC
17 aperach@mcdonaldcarano.com, mcarter@mcdonaldcarano.com

18 U.S. TRUSTEE - LV - 7
19 USTPRegion17.LV.ECF@usdoj.gov

20 RYAN J. WORKS on behalf of Debtor AMERI-DREAM REALTY LLC
21 rworks@mcdonaldcarano.com, kbarrett@mcdonaldcarano.com;bgrubb@mcdonaldcarano.com

22 I declare under penalty of perjury that the foregoing is true and correct.

23 DATED 16th day of February, 2015.

24 /s/ Kathleen Seckinger
25 An Employee of
26 CONNAGHAN NEWBERRY LAW FIRM
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