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Electronically Filed On: February 17, 2015

5 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*

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

10 In re:
11 AMERI-DREAM REALTY, LLC,
12 Debtor.

Case No. BK-S-15-10110-LED
Chapter 7

**AFFIDAVIT OF JACOB L. HOUMAND,
ESQ. IN SUPPORT OF EX PARTE
APPLICATION FOR ORDER
SHORTENING TIME ON TRUSTEE'S
APPLICATION TO (1) EMPLOY NELLIS
AUCTION AS AUCTIONEER TO SELL
PERSONAL PROPERTY, PAY
COMMISSION, REIMBURSE EXPENSES
AND (2) APPROVE THE SALE OF
PERSONAL PROPERTY FREE AND
CLEAR OF LIENS, CHARGES,
INTEREST AND ENCUMBRANCES
PURSUANT TO 11 U.S.C. § 363**

Date of Hearing: *OST Pending*
Time of Hearing: *OST Pending*
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

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24 STATE OF NEVADA)
25 COUNTY OF CLARK) ss:

26 I, Jacob L. Houmand, Esq., under oath and under penalty of perjury say:

27 1. I am an attorney duly licensed to practice law in the State of Nevada.

28 ...

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1 2. I am a shareholder with the law firm of Nelson & Houmand, P.C. (the "Firm"),
2 proposed counsel of record for Victoria L. Nelson, the duly appointed Chapter 7 Trustee in the
3 above-captioned bankruptcy case (referred to herein as the "Trustee").

4 3. I have personal knowledge of the facts set forth herein.

5 4. I make this Affidavit in Support of the Ex Parte Application for Order Shortening
6 Time on Trustee's Application to (1) Employ Nellis Auction as Auctioneer to Sell Personal
7 Property, Pay Commission, Reimburse Expenses and (2) Approve the Sale of Personal Property
8 Free and Clear of Liens, Charges, Interest and Encumbrances Pursuant to U.S.C. §363 (the
9 "Application").¹

10 5. On February 17, 2015, the Trustee filed a Trustee's Application to (1) Employ
11 Nellis Auction as Auctioneer to Sell Personal Property, Pay Commission, Reimburse Expenses
12 and (2) Approve the Sale of Personal Property Free and Clear of Liens, Charges, Interest and
13 Encumbrances Pursuant to U.S.C. §363 (the "Application to Employ").

14 6. The Application to Employ seeks authority to employ Nellis Auction as auctioneer
15 to sell personal property, pay commission, reimburse expenses (if any) and (2) approve the sale of
16 the personal property free and clear of liens, charges, interest and encumbrances pursuant to 11
17 U.S.C. § 363.

18 7. It is necessary to have the Application to Employ heard on shortened time in order
19 to sell the personal property left behind when the Debtor filed its bankruptcy petition and reject
20 the lease to the office space to minimize administrative expenses.

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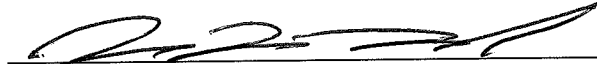
24 _____
25 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
26 U.S.C. §§ 101-1532. The Federal Rules of Civil Procedure shall be referred to as "FRCP" and the
27 Federal Rules of Bankruptcy Procedure shall be referred to as "FRBP." The Local Rules of
28 Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as
the "Local Rules." In addition, all defined terms in this Affidavit shall have the same meaning
ascribed to them in the Application.

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1 8. For these reasons, the Court should issue an order shortening time and permit the
2 Application to Employ to be heard on shortened time pursuant to FRBP 9006.

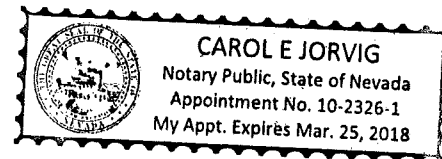
3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct.

5 FURTHER AFFIANT SAYETH NAUGHT.

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7 _____
8 Jacob L. Houmand, Esq.

9 SUBSCRIBED AND SWORN TO
10 before me this 17th day of February, 2015.

11 
12 _____
13 Notary Public



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