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5 *[Proposed] Attorneys 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

**NOTICE OF HEARING ON
APPLICATION TO EMPLOY NELSON &
HOUMAND, P.C., NUNC PRO TUNC, AS
GENERAL BANKRUPTCY COUNSEL
FOR VICTORIA L. NELSON, CHAPTER
7 TRUSTEE PURSUANT TO 11 U.S.C.
§§ 327(a) AND 328(a) AND FEDERAL
RULE OF BANKRUPTCY PROCEDURE
2014**

Date of Hearing: March 31, 2015
Time of Hearing: 2:30 p.m
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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22 **NOTICE IS HEREBY GIVEN** that Victoria L. Nelson, the appointed Chapter 7 Trustee
23 in the above-captioned bankruptcy case (the "Trustee"), by and through her proposed attorney of
24 record Jacob L. Houmand, Esq. of the law firm of Nelson & Houmand, P.C., has filed the
25 Application to Employ Nelson & Houmand, P.C., *Nunc Pro Tunc*, as General Bankruptcy
26 Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a)
27 and Federal Rule of Bankruptcy Procedure 2014 (the "Application"). The Application seeks to
28 employ the law firm of Nelson & Houmand, P.C. (the "Firm") as general bankruptcy pursuant to

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1 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy Procedure 2014. Subject to
 2 Court approval, in accordance with 11 U.S.C. § 330, the Trustee seeks to retain the Firm on an
 3 hourly basis at the customary and standard rates that the Firm charges for similar representation,
 4 plus reimbursement of actual and necessary expenses incurred by the Firm in performing its
 5 duties. The Firm proposes the compensation of attorneys be at varying rates currently ranging
 6 from \$300 per hour to \$325 per hour for the services of attorneys, subject to change from time to
 7 time, and all subject to application to, and approval by, this Court pursuant to Sections 330 and
 8 331 of the Bankruptcy Code. The Firm proposes the compensation of paraprofessionals be at
 9 varying rates currently ranging from \$175 per hour for paraprofessionals, subject to change from
 10 time to time, and all subject to application to, and approval by, this Court pursuant to Sections
 11 330 and 331 of the Bankruptcy Code. The Application further seeks authority to employ the Firm
 12 *nunc pro tunc* effective as of January 13, 2015. Victoria L. Nelson, the Chapter 7 Trustee is a
 13 member of the Firm and will not personally bill any legal fees in this case.

14 A copy of the Application, the Declaration of Victoria L. Nelson In Support of the
 15 Application to Employ Nelson & Houmand, P.C., *Nunc Pro Tunc*, as General Bankruptcy
 16 Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a)
 17 and Federal Rule of Bankruptcy Procedure 2014, and the Declaration of Jacob L. Houmand, Esq.
 18 In Support of the Application to Employ Nelson & Houmand, P.C., *Nunc Pro Tunc*, as General
 19 Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a)
 20 and 328(a) and Federal Rule of Bankruptcy Procedure 2014 are on file with the Clerk's Office of
 21 the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas,
 22 Nevada 89101. Copies of the Objection and supporting declarations may also be obtained from
 23 counsel for the Trustee or through the Bankruptcy Court's website at www.nvb.uscourts.gov.

24 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
 25 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
 26 must file an opposition with the Court, and serve a copy of the person making the Motion *no later*
 27 *than fourteen (14) days preceding the hearing date for the Motion*. The opposition must state
 28 your position, set forth all relevant facts and legal authority, and be supported by affidavits or

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1 declarations that conform to Local Rule 9014(c).

2 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
3 with the court. You *must* also serve your written response on the person who sent you this
4 notice.

5 If you do not file a written response with the court, or if you do not serve your written
6 response on the person who sent you this notice, then:


- 7 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 8 • The Court may *rule against you* without formally calling the matter at the hearing.

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10 **NOTICE IS FURTHER GIVEN** that a hearing on said Motion will be held before a
11 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Third
12 Floor, Courtroom No. 3, Las Vegas, Nevada on March 31, 2015, at 2:30 p.m.

13 **NOTICE IS FURTHER GIVEN** that this hearing may be continued from time to time
14 without further notice except for the announcement of any adjourned dates and times at the
15 above-noted hearing or any adjournment thereof.

16 Dated this 2nd day of February, 2015.

17 **NELSON & HOUMAND, P.C.**

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