

1 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
Email: jhoumand@nelsonhoumand.com  
2 NELSON & HOUMAND, P.C.  
3900 Paradise Road; Suite U  
3 Las Vegas, Nevada 89169-0903  
Telephone: 702/720-3370  
4 Facsimile: 702/720-3371

*Electronically Filed On: February 3, 2015*

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

6  
7  
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

**DECLARATION OF VICTORIA L. NELSON IN SUPPORT OF TRUSTEE'S EX PARTE APPLICATION IN SUPPORT OF TRUSTEE'S EX PARTE APPLICATION FOR ORDER LIMITING NOTICE**

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

Judge: Honorable Laurel E. Davis

13  
14  
15  
16  
17  
18 I, Victoria L. Nelson, declare as follows:

19 1. I am over the age of 18 years and I am competent to make this declaration. I have  
20 personal knowledge of the facts set forth herein, except for those facts stated on information and  
21 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I  
22 could and would testify as to the matters set forth below based upon my personal knowledge.<sup>1</sup>

23 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.  
24  
25

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."

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371

1           3.       I make this declaration in support of the Trustee’s Ex Parte Application to Limit  
2 Notice (the “Application”).<sup>2</sup>

3           4.       On January 9, 2015, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7  
4 of Title 11 of the United States Code [ECF No. 1].<sup>3</sup>

5           5.       On January 9, 2015, I was appointed as the Chapter 7 Trustee in the Debtor’s  
6 bankruptcy case [ECF No. 4].

7           6.       The Debtor is a real estate brokerage firm that represented clients in the purchase  
8 and sale of real property throughout Las Vegas, Nevada.

9           7.       The Debtor also had a property management division that managed hundreds of  
10 rental properties for various landowners and tenants throughout the valley in Las Vegas, Nevada.

11          8.       At the time of the Debtor’s bankruptcy filing, it was a party to hundreds of  
12 property management agreements.

13          9.       The mailing matrix currently consists of approximately Two Thousand Eight  
14 Hundred (2,800) creditors and/or parties in interest.

15          10.      In order to provide notice to the entire mailing matrix, it will cost the bankruptcy  
16 estate a minimum of approximately One Thousand Three Hundred Fifty Dollars (\$1,350.00) per  
17 mailing.

18          11.      I have established and am maintaining a website containing general information  
19 regarding the bankruptcy case including scheduled up-coming hearings which is located at  
20 <http://nelsonhoumand.com/ameri-dream-realty-llc>. I have also established and am maintaining a  
21 website which provides the entire court docket in which parties can view the pleadings filed in  
22 this bankruptcy case which is located at [http://nelsonhoumand.com/ameri-dream-realty-court-](http://nelsonhoumand.com/ameri-dream-realty-court-documents)  
23 [documents](http://nelsonhoumand.com/ameri-dream-realty-court-documents).

24 \_\_\_\_\_  
25  
26 <sup>2</sup> All defined terms herein shall have the same meaning ascribed to them in the Application unless  
27 otherwise provided.

28 <sup>3</sup> All references to “ECF No.” are to the numbers assigned to the documents filed in the case as  
they appear on the docket maintained by the clerk of the court.

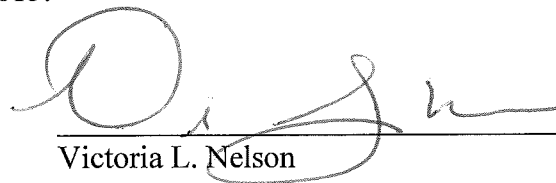
1 12. The application of the notice procedures as set forth in the Application is  
2 especially appropriate in a case of this size and magnitude, where providing notice of every  
3 matter to thousands of creditors and interested parties would be unjustifiably burdensome and  
4 economically infeasible for the bankruptcy estate.

5 13. I propose to establish an Official Service List, a copy of which is attached hereto  
6 as **Exhibit "1."** The Official Service List will include the Debtor's counsel of record, parties in  
7 interest who formally request notice by filing a written request for notice with the Clerk of the  
8 Court, and other governmental agencies required to receive notice of proceedings under the  
9 Bankruptcy Rules and Local Bankruptcy Rules. The parties in interest required to receive notice  
10 of proceedings would be limited to those parties included on the Official Service List, those filing  
11 a notice of appearance and request for service, and any other persons whose rights or interests are  
12 directly affected by any particular proceeding in these cases.

13 14. I further request that the Court approve as to form the *Notice of Requirement for*  
14 *Filing Written Request with Court to be Included on Official Service List for Notice of*  
15 *Proceedings* (the "Notice") attached hereto as **Exhibit "2."**

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

18 Dated this 3<sup>rd</sup> day of February, 2015.

19   
20 \_\_\_\_\_  
21 Victoria L. Nelson

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371

# **EXHIBIT “1”**

1 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
Email: jhoumand@nelsonhoumand.com  
2 NELSON & HOUMAND, P.C.  
3900 Paradise Road; Suite U  
3 Las Vegas, Nevada 89169-0903  
Telephone: 702/720-3370  
4 Facsimile: 702/720-3371

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

6  
7  
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

13  
14 **OFFICIAL SERVICE LIST FOR AMERI-DREAM REALTY, LLC**  
15 **(AS OF FEBRUARY 3, 2015)**

16 **Debtor's Counsel**

17 Ryan J. Works, Esq.  
McDonald Carano Wilson, LLP  
18 2300 W. Sahara Avenue, Suite 1200  
Las Vegas, NV 89102  
19

20 **United States Trustee**

21 Office of United States Trustee  
300 Las Vegas Boulevard South, Suite 4300  
22 Las Vegas, NV 89101

23 **Parties Requesting Notice**

24 Richard F. Holley, Esq.  
25 Holley, Driggs, Walch, Puzey, Thompson  
400 South Fourth Street, 3<sup>rd</sup> Floor  
26 Las Vegas, NV 89101

27 Tara D. Newberry, Esq.  
Connaghan Newberry Law Firm  
28 7854 W. Sahara Avenue  
Las Vegas, NV 89117

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371

1 **Governmental Agencies**

2 Dept. of Employment, Training & Rehab  
3 Employment Security Division  
4 500 East Third Street  
5 Carson City, NV 89713

6 Internal Revenue Service  
7 P.O. Box 7346  
8 Philadelphia, PA 19101-7346

9 Nevada Department of Taxation  
10 Attn: Bankruptcy Section  
11 555 E. Washington Ave., #1300  
12 Las Vegas, NV 89101

13 Clark County Assessor  
14 c/o Bankruptcy Clerk  
15 500 S Grand Central Pkwy  
16 Box 551401  
17 Las Vegas, NV 89155-1401

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371

# **EXHIBIT “2”**

1 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
Email: jhoumand@nelsonhoumand.com  
2 NELSON & HOUMAND, P.C.  
3900 Paradise Road; Suite U  
3 Las Vegas, Nevada 89169-0903  
Telephone: 702/720-3370  
4 Facsimile: 702/720-3371

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

6  
7  
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 REQUIREMENT FOR  
FILING WRITTEN REQUEST WITH  
COURT TO BE INCLUDED ON  
OFFICIAL SERVICE LIST FOR NOTICE  
OF PROCEEDINGS**

Judge: Honorable Laurel E. Davis

13  
14  
15  
16  
17 **TO ALL PARTIES IN INTEREST:**

18  
19 **PLEASE TAKE NOTICE** that the United State Bankruptcy Court for the District of  
20 Nevada (the "Court") has issued an Order Establishing Noticing Requirements with respect to the  
21 above-styled bankruptcy proceedings (the "Notice Order"). In accordance with the Notice Order,  
22 notice of all future proceedings in which case shall be given only to those creditors and parties in  
23 interest that are listed on the Official Service List, and those who file with the Court and serve on  
24 the undersigned counsel a written request to be included in the Official Service List to be  
25 established in this case. The Official Service List will initially include the Debtor's counsel of  
26 record, the United States Trustee, the parties in interest who formally request notice by filing a  
27 written request for notice with the Clerk of the Court, and other governmental agencies required  
28 to receive notice of proceedings under the Bankruptcy Rules and Local Bankruptcy Rules.  
Therefore, if you are not one of the parties specifically mentioned above, you must file a written  
request for notice with the Clerk of the Court, United States Bankruptcy Court, District of  
Nevada, 300 Las Vegas Boulevard South, 4<sup>th</sup> Floor, Las Vegas, NV 89101, if you desire to  
receive notice of the proceedings in this bankruptcy case.

**PLEASE TAKE FURTHER NOTICE** that the Official Service List has been established  
in order to protect the assets of the above-referenced bankruptcy estate in this case from  
diminution resulting from the copying, postage, and other expenses associated with providing

NELSON & HOUMAND, P.C.  
3900 Paradise Road, Suite U  
Las Vegas, Nevada 89169  
Telephone: (702) 720-3370  
Facsimile: (702) 720-3371



1 notice of proceedings to approximately Two Thousand Eight Hundred (2,800) creditors and  
2 interested parties in this bankruptcy case. Therefore, unless you intend to be an active participant  
3 in this bankruptcy case, it is requested that you not file a written request to be included on the  
4 Official Service List.

5 **PLEASE TAKE FURTHER NOTICE** that if you opt not to file a written request to be  
6 included on the Official Service List, you can receive notice containing general information  
7 regarding the bankruptcy case including scheduled up-coming hearings which is located at  
8 <http://nelsonhoumand.com/ameri-dream-realty-llc>. A website has also been established which  
9 provides the entire court docket in which you can view the pleadings filed in this bankruptcy case  
10 which is located at <http://nelsonhoumand.com/ameri-dream-realty-court-documents>. These  
11 websites have been established and are maintained by the Trustee.

12 DATED: February \_\_\_\_\_, 2015

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

14 \_\_\_\_\_  
15 Jacob L. Houmand, Esq. (NV Bar No. 12781)  
16 3900 Paradise Road; Suite U  
17 Las Vegas, Nevada 89169-0903  
18 Telephone: 702/720-3370  
19 Facsimile: 702/720-3371

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

22 **NELSON & HOUMAND, P.C.**  
23 3900 Paradise Road, Suite U  
24 Las Vegas, Nevada 89169  
25 Telephone: (702) 720-3370  
26 Facsimile: (702) 720-3371