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*Electronically Filed On: February 5, 2015*

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

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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

**AFFIDAVIT OF JACOB L. HOUMAND,**  
**ESQ. IN SUPPORT OF EX PARTE**  
**APPLICATION FOR ORDER**  
**SHORTENING TIME ON APPLICATION**  
**FOR ORDER LIMITING NOTICE AND**  
**MEMORANDUM OF POINTS AND**  
**AUTHORITIES IN SUPPORT THEREOF**

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

21 STATE OF NEVADA )  
22 ) ss:  
23 COUNTY OF CLARK )

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

- 24 1. I am an attorney duly licensed to practice law in the State of Nevada.
- 25 2. I am a shareholder with the law firm of Nelson & Houmand, P.C. (the "Firm"),
- 26 proposed counsel of record for Victoria L. Nelson, the appointed Chapter 7 Trustee in the above-
- 27 captioned bankruptcy case (referred to herein as the "Trustee").

28 ...

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

2 4. I make this Affidavit in Support of the Ex Parte Application for Order Shortening  
3 Time on Application for Order Limiting Notice and Memorandum of Points and Authorities In  
4 Support Thereof (the "Application").<sup>1</sup>

5 5. On February 5, 2015, the Trustee filed an Application for Order Limiting Notice  
6 and Memorandum of Points and Authorities In Support Thereof (the "Application to Limit  
7 Notice").

8 6. The Application to Limit Notice requests that the Court (i) establish a limited  
9 service list (the "Official Service List"); (ii) limit notice of proceedings in this case to the parties  
10 on the Official Service List; (iii) approve the form and manner of notice to be transmitted to  
11 parties in interest concerning establishment of the Official Service List; and (iv) provide notice to  
12 all other parties in interest other than those identified on the Official Service List via a website  
13 established and maintained by the Trustee.

14 7. As set forth in the Application to Limit Notice, it is estimated that each mailing to  
15 the Debtor's creditor body will cost the bankruptcy estate several thousand dollars. Requiring the  
16 bankruptcy estate to incur these expenses during each mailing will only result in increased  
17 administrative expenses that will lessen any ultimate distribution to unsecured creditors.

18 8. The Trustee has also instituted other procedures that will effectively provide notice  
19 to the Debtor's creditors and other parties-in-interest by creating and maintaining a website that is  
20 dedicated to the Debtor's bankruptcy case. General information regarding the administration of  
21 the Debtor's bankruptcy case can be accessed at the following link:  
22 <http://nelsonhoumand.com/ameri-dream-realty-llc>. All of the documents and pleadings that are  
23 filed in the Debtor's bankruptcy case can be accessed at the following link:

24  
25 <sup>1</sup> 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.

1 http://nelsonhoumand.com/ameri-dream-realty-court-documents. The Trustee will also update  
2 these webpages on a daily basis.


3 9. An order shortening time will greatly assist in the administration of the Debtor's  
4 bankruptcy case because the Trustee anticipates the need to file additional motions relating that  
5 may require notice to all of the creditors including, but not limited to, the employment of an  
6 auctioneer to sell the personal property located on the Debtor's premises.

7 10. The cost to provide notice to all of the Debtor's creditors may outweigh the net  
8 proceeds generated from any sale.


9 11. For these reasons, the Court should issue an order shortening time and permit the  
10 Application to Limit Notice to be heard on shortened time pursuant to FRBP 9006.

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

13 FURTHER AFFIANT SAYETH NAUGHT.

14   
15 \_\_\_\_\_  
16 Jacob L. Houmand, Esq.

17 SUBSCRIBED AND SWORN TO  
18 before me this 5th day of February, 2015.

19   
20 \_\_\_\_\_  
21 Notary Public



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