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*Electronically Filed On: February 5, 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 OMNIBUS  
MOTION OF THE CHAPTER 7  
TRUSTEE FOR ENTRY OF ORDER  
AUTHORIZING REJECTION OF  
EXECUTORY CONTRACTS PURSUANT  
TO 11 U.S.C. § 365(a)**

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

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

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

26 2. I am a shareholder with the law firm of Nelson & Houmand, P.C. (the "Firm"),

27 proposed counsel of record for Victoria L. Nelson, the appointed Chapter 7 Trustee in the above-  
28 captioned bankruptcy case (referred to herein as the "Trustee").

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

4. I make this Affidavit in Support of the Ex Parte Application for Order Shortening Time on Omnibus Motion of the Chapter 7 Trustee for Entry of Order Authorizing the Rejection of Executory Contracts Pursuant to 11 U.S.C. § 365(a) (the "Application").<sup>1</sup>

5. On February 5, 2015, the Trustee filed an Omnibus Motion of the Chapter 7 Trustee for Entry of Order Authorizing the Rejection of Executory Contracts Pursuant to 11 U.S.C. § 365(a) (the "Motion").

6. The Motion seeks authority to reject the Property Management Agreements that were entered into between the Trustee and various owners of real property throughout Las Vegas, Nevada.

7. It is necessary to have the Motion heard on shortened time in order to allow the property owners to locate new property managers to continue the collection of rent and general maintenance of the real properties at issue.

8. The rejection of the Property Management Agreements will permit the owners of the real properties to locate new property managers that will result in the continued collection of rent.

9. Since the majority of the unsecured creditors identified in the Debtor's schedules are the owners of the real properties that are subject to the Property Management Agreements, permitting the Property Management Agreements to be rejected on shortened time will provide a significant benefit to the Debtor's creditor body.

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<sup>1</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532. The Federal Rules of Civil Procedure shall be referred to as "FRCP" and the Federal Rules of Bankruptcy Procedure shall 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." In addition, all defined terms in this Affidavit shall have the same meaning ascribed to them in the Application.

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1 10. For these reasons, the Court should issue an order shortening time and permit the  
2 Motion 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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9 Jacob L. Houmand, Esq.

10 SUBSCRIBED AND SWORN TO  
11 before me this 5th day of February, 2015.



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14 Notary Public

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