

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 6, 2015

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 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: February 17, 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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21 **NOTICE IS HEREBY GIVEN** that Victoria L. Nelson, the appointed Chapter 7 Trustee
22 in the above-captioned bankruptcy case (the "Trustee"), by and through her proposed attorney of
23 record Jacob L. Houmand, Esq. of the law firm of Nelson & Houmand, P.C., has filed an
24 Omnibus Motion of the Chapter 7 Trustee for Entry of Order Authorizing the Rejection of
25 Executory Contracts Pursuant to 11 U.S.C. § 365(a) (the "Motion"). The Motion seeks to reject
26 certain property management agreements (the "Property Management Agreements") that were
27 entered into between Ameri-Dream Realty, LLC (the "Debtor") and certain real property owners
28 throughout Las Vegas, Nevada pursuant to 11 U.S.C. § 365(a). The list of the Property

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1 Management Agreements that the Trustee seeks to reject are attached to the Motion as **Exhibit**
 2 **“1”**. Pursuant to Federal Rule of Bankruptcy Procedure 6006(f)(1) all parties receiving this
 3 Notice should review the Property Management Agreements identified in **Exhibit “1”** to the
 4 Motion to determine if their Property Management Agreement would be rejected pursuant to the
 5 Motion. Pursuant to Federal Rule of Bankruptcy Procedure 6006(f)(2), the Property Management
 6 Agreements identified in **Exhibit “1”** to the Motion are organized in alphabetical order according
 7 to the property owner’s last name.

8 A copy of the Motion, the Declaration of Victoria L. Nelson In Support of the Omnibus
 9 Motion of the Chapter 7 Trustee for Entry of Order Authorizing the Rejection of Executory
 10 Contracts Pursuant to 11 U.S.C. § 365(a) are on file with the Clerk’s Office of the United States
 11 Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies
 12 of the Motion and supporting declarations may also be obtained from counsel for the Trustee or
 13 through the Bankruptcy Court’s website at www.nvb.uscourts.gov. Copies of the Motion and
 14 supporting declaration can be accessed at the following website that is managed by the Trustee:
 15 <http://nelsonhoumand.com/ameri-dream-realty-court-documents>.

16 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
 17 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
 18 must file an opposition with the Court, and serve a copy of the person making the Motion ***no later***
 19 ***than February 13, 2015***. The opposition must state your position, set forth all relevant facts and
 20 legal authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

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

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

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


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1 NOTICE IS FURTHER GIVEN that a hearing on said Motion will be held before a
2 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Third
3 Floor, Courtroom No. 3, Las Vegas, Nevada on February 17, 2015, at 2:30 p.m.

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

7 Dated this 6th day of February, 2015.

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