

1 Victoria L. Nelson, Chapter 7 Trustee
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7 Chapter 7 Trustee

Electronically Filed On: February 10, 2015

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

**EX PARTE APPLICATION FOR ORDER
AUTHORIZING EMPLOYMENT OF
ACCOUNTANT**

Judge: Honorable Laurel E. Davis

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16 Victoria L. Nelson, the duly appointed Chapter 7 Trustee in above-referenced bankruptcy
17 case (the "Trustee"), pursuant to 11 U.S.C. § 327(a), hereby files this Ex Parte Application for
18 Order Authorizing Employment of Paul M. Healey, CPA (the "Application") as accountant for
19 preparation of (i) the 1099's for the taxable year ending 2014 and (ii) tax returns for the
20 bankruptcy estate. The services of Paul M. Healey ("Healey") are necessary to enable the Trustee
21 to faithfully execute her duties as the trustee for the above-referenced bankruptcy estate.

22 The Application is based upon the following memorandum of points and authorities, the
23 Declaration of Paul M. Healey in Support of the Application for Order Authorizing Employment
24 of Paul M. Healey, CPA (the "Healey Declaration"), which is filed separately and concurrently
25 with this Application pursuant to Rule 9014(c)(2) of the Local Rules of Bankruptcy Procedure for
26 the United States Bankruptcy Court for the District of Nevada (the "Local Rules"). Attached
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1 hereto and marked as **Exhibit "1"** is a copy of the proposed Order approving the Application.
2 The Application is also based upon the pleadings and records on file herein.¹

3 Dated this 10th day of February, 2015.

4 **CHAPTER 7 TRUSTEE**

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11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 1. The administration of this case will involve the preparation of the 1099's for the
13 year ending 2014 and the determination of tax issues, preparation of federal income tax returns
14 and the employment of an accountant is necessary to accomplish these tasks.

15 2. Healey is a certified public accountant licensed in the State of Nevada and is
16 experienced in these matters and in bankruptcy estate taxation issues. *See* Healey Declaration.

17 3. Healey has no connection with Ameri-Dream Realty, LLC (the "Debtor"), it's
18 creditors, or any other party in interest. Further, Healey represents no interest adverse to the
19 Trustee, the bankruptcy estate, or any other party in interest herein, their respective attorneys and
20 accountants, the United States Trustee, or any person employed in the Office of the United States
21 Trustee. Healey does represent the Trustee in other accounting and taxation transactions
22 unrelated to the Debtor's bankruptcy estate. *See* Healey Declaration.

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27 ¹ Trustee also requests that the Court take judicial notice of all pleadings filed in the above-
28 referenced bankruptcy case pursuant Rule of Evidence 201, incorporated by reference by FRBP
9017.

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4. Healey's employment would be in the best interest of the Debtor's bankruptcy estate.

Dated this 10th day of February, 2015.

CHAPTER 7 TRUSTEE



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Chapter 7 Trustee

EXHIBIT “1”

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[PROPOSED ORDER]

Victoria L. Nelson, Chapter 7 Trustee
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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

Case No. BK-S-15-15-10110-LED
Chapter 7

**ORDER GRANTING EX PARTE
APPLICATION FOR ORDER
AUTHORIZING EMPLOYMENT OF
ACCOUNTANT¹**

Judge: Honorable Laurel E. Davis

Upon consideration of the Ex Parte Application for Order Authorizing Employment of Accountant [ECF No. 91] (the "Application") pursuant to 11 U.S.C. § 327(a); it appearing to the Court that the accountant does not hold or represent an interest adverse to the estate, the Trustee, the United States Trustee or its employees, or any other interested party; that the accountant is a disinterested party within the meaning of Section 101(14) of the Bankruptcy Code, and may represent the Trustee under 11 U.S.C. § 327(a) and that the employment of an accountant is necessary and in the best interest of the bankruptcy estate and its creditors; and good cause

¹ In this Order, 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. All references to "Section" are to the provisions of the Bankruptcy Code, 11 U.S.C. §§ 101-1532.

1 appearing therefore, it is hereby

2 **ORDERED** that pursuant to Section 327(a) of the Bankruptcy Code, the Trustee is
3 authorized to employ Paul M. Healey, CPA, as the bankruptcy estate's accountant in accordance
4 with the terms of the agreement set forth in the Application. The payment of all fees and costs
5 are subject to further approval of this Court.

6 **IT IS SO ORDERED.**

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8 **PREPARED AND SUBMITTED BY:**

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10 /s/ Victoria L. Nelson
11 Victoria L. Nelson, Chapter 7 Trustee
12 3900 Paradise Road; Suite U
13 Las Vegas, Nevada 89169-0903
14 Telephone: 702/720-3370
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16 *Chapter 7 Trustee*

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