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*Electronically Filed February 11, 2015*

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6 **UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

7 In re  
8 AMERI-DREAM REALTY, LLC,  
9 Debtor.

Case No.: 15-10110-led  
Chapter 7

10 **RESPONSE TO ORDER TO SHOW CAUSE**

11 Hearing Date: February 17, 2015  
12 Hearing Time: 2:30 p.m. Pacific

13 Hearing Place: Foley Federal Building, 300 Las  
14 Vegas Blvd. South, Las Vegas, NV, Courtroom  
#3

15 Debtor Ameri-Dream Realty, LLC (“Debtor”) hereby files this Response to the Court’s  
16 Order to Show Cause (“OSC”) [Docket No. 70]. A hearing on the OSC is currently scheduled  
17 for February 17, 2015 at 2:30 p.m. The Court’s OSC orders “that Debtor’s attorney shall  
18 appear and show cause why this case should not be dismissed for failure to comply with this  
19 Court’s *Guidelines [for a Claims and Noticing Agent].*”<sup>1</sup>

20 Counsel for the Debtor has worked diligently since the start of this case to retain a  
21 claims agent, and with the assistance Victoria L. Nelson, Chapter 7 Trustee (“Trustee”) the  
22 parties were able to retain the Garden City Group, LLC on behalf of the Chapter 7 estate.  
23 Debtor’s counsel was unable to retain the claims agent, immediately after the petition was filed,  
24 and without the consent of the Trustee. On February 9, 2014, the Trustee filed an *Application*  
25 *for Order Authorizing Employment of The Garden City Group, LLC as Claims and Noticing*  
26 *Agent* (the “Application”) [Docket No. 88]. A hearing on the Application is set for March 31,

27  
28 <sup>1</sup> Separately, and pursuant to this Court’s guidelines for telephonic appearances, Debtor’s  
counsel has requested permission to appear telephonically as he is scheduled to be out of town  
February 17, 2015 at 2:30 p.m. Pacific Time attending to other business matters.

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1 2015. Because we now have a pending Application to employ a claims agent, cause exists to  
2 *not* dismiss the instant Chapter 7 Case and counsel respectfully requests that the hearing on the  
3 OSC be vacated. To the extent the Court wants to keep the OSC calendared, counsel  
4 respectfully requests permission to appear telephonically on February 17, 2015 as requested  
5 fully in the correspondence being delivered concurrently to chambers.

6 DATED this 11th day of February, 2015.

7 McDONALD CARANO WILSON LLP

8 By: /s/ Ryan J. Works  
9 Ryan J. Works, Esq. (#9224)  
10 Amanda M. Perach, Esq. (NV Bar No. 12399)  
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13 *Counsel for Ameri-Dream Realty, LLC*

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