

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: March 6, 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 MOTION TO
EXTEND DEADLINE TO ASSUME OR
REJECT EXECUTORY CONTRACTS
PURSUANT TO 11 U.S.C. § 365(d)(1)

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

23 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 duly appointed Chapter 7 Trustee in the
27 above-captioned bankruptcy case (referred to herein as the "Trustee").

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Las Vegas, Nevada 89169
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Facsimile: (702) 720-3371

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 Motion to Extend Deadline to Assume or Reject Executory Contracts Pursuant to 11 U.S.C. § 365(d)(1) (the “Application”).¹

5. On March 6, 2015, the Trustee filed a Motion to Extend Deadline to Assume or Reject Executory Contracts Pursuant to 11 U.S.C. § 365(d)(1) (the “Motion to Extend Deadline”).

6. The Motion to Extend Deadline seeks to enlarge the time for the Trustee to complete her investigation as to the cancellation of the Policy² and determine whether she will assume or reject the Policy the bankruptcy estate’s remaining executory contracts.

7. It is necessary to have the Motion to Extend Deadline heard on shortened time in order to preserve the Trustee’s right to assume the Policy and the bankruptcy estate’s remaining executory contracts, as the deadline to assume or reject executory contracts is March 10, 2015, pursuant to Section 365(d)(1).

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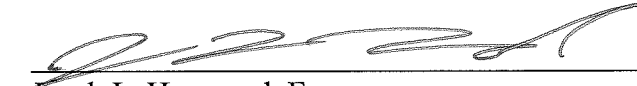
¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532. The Federal Rules of Civil Procedure shall be referred to as “FRCP” and the Federal Rules of Bankruptcy Procedure shall be referred to as “FRBP.” The Local Rules of Practice for the United 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.

² All defined terms in this Affidavit shall have the same meaning ascribed to them in the Motion to Extend Deadline unless otherwise provided.


1 8. For these reasons, the Court should issue an order shortening time and permit the
2 Motion to Extend Deadline 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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7 
8 Jacob L. Houmand, Esq.

9 SUBSCRIBED AND SWORN TO
10 before me this 6th day of March, 2015.

11 
12 Notary Public



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