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5 *Counsel for Victoria L. Nelson, Chapter 7 Trustee*

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7
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

STIPULATION TO REINSTATE
ERRORS AND OMISSIONS INSURANCE
POLICY ISSUED BY PEARL
INSURANCE

Judge: Honorable Laurel E. Davis

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16 Victoria L. Nelson, the Chapter 7 Trustee appointed in the above-captioned bankruptcy
17 matter (the "Trustee"), by and through her counsel, Jacob L. Houmand, Esq. of the law firm of
18 Nelson & Houmand, P.C., and Pearl Insurance (the "Pearl Insurance"), the company that issued
19 the Debtor's Errors and Omissions Insurance Policy, by and through its authorized agent (the
20 Trustee and Pearl Insurance shall be collectively referred to as the "Parties"), hereby stipulate and
21 agree as follows:

22 **RECITALS**

23 1. On January 9, 2015, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7
24 of Title 11 of the United States Code [ECF No. 1]¹.

25 ...

26 _____
27 ¹ In this Motion, all references to "ECF No." are to the numbers assigned to the documents filed in
28 the case as they appear on the docket maintained by the clerk of the court.

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1 2. On January 9, 2015, Victoria L. Nelson was appointed as the Chapter 7 Trustee in
2 the Debtor's bankruptcy case [ECF No. 4].

3 3. Prior to the Debtor's bankruptcy filing, the Debtor submitted a claim through its
4 Errors and Omissions Insurance Policy issued by Pearl Insurance (the "Policy").

5 4. Following the Debtor's bankruptcy filing, Pearl Insurance sent a notice to the
6 Debtor that the Policy was cancelled for non-payment (the "Cancellation Notice").

7 5. The Parties have now agreed to reinstate the Policy according to the terms set forth
8 in this Stipulation.

9 **STIPULATION**

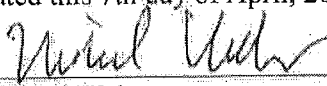
10 **IT IS HEREBY STIPULATED AND AGREED** that the Policy shall be reinstated and
11 the Cancellation Notice rescinded.

12 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that the Trustee shall
13 remit payment to BankDirect Capital Finance in the amount of Three Thousand One Hundred
14 Thirty-Three and 84/100 Dollars (\$3,133.84) within five (5) business days of entry of the order
15 approving this Stipulation.

16 Dated this 7th day of April, 2015

Dated this 7th day of April, 2015

17 /s/ Jacob L. Houmand
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