

EXHIBIT “1”

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PROPOSED ORDER

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Counsel for Victoria L. Nelson, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

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

**ORDER GRANTING EX PARTE
APPLICATION FOR ORDER
AUTHORIZING PURCHASE OF
ERRORS AND OMISSIONS TAIL
COVERAGE FROM PEARL INSURANCE**

Judge: Honorable Laurel E. Davis

This matter came before the Court on the *Ex Parte Application for Order Authorizing Purchase of Errors and Omissions Tail Coverage Through Pearl Insurance* (the "Application")¹

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of Bankruptcy Procedure will 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."

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1 [ECF No. 174]² filed by Jacob L. Houmand, Esq. of the law firm Nelson & Houmand, P.C.,
2 general bankruptcy counsel for Victoria L. Nelson, the Chapter 7 Trustee in the above-captioned
3 bankruptcy case. The Application sought authority to purchase Errors and Omissions Tail
4 Coverage from Pearl Insurance (“Tail Coverage”) for up to a two (2) year period.

5 The Court reviewed the Application, the *Declaration of Victoria L. Nelson In Support of*
6 *Ex Parte Application for Order Authorizing Purchase of Errors and Omissions Tail Coverage*
7 *Through Pearl Insurance* [ECF No. 175], the exhibits attached thereto, and all other pleadings
8 and papers on file herein.

9 It appearing to the Court that the purchase of Tail Coverage is necessary and in the best
10 interests of the Bankruptcy Estate and its creditors, and upon consideration of the pleadings and
11 good cause appearing, it is hereby,

12 **ORDERED** that the Application is **GRANTED** in its entirety.

13 **IT IS FURTHER ORDERED** that the Trustee is permitted to purchase Tail Coverage
14 from Pearl Insurance in accordance with the terms set forth in the Application.

15 **IT IS SO ORDERED.**

16 Prepared and submitted by:

17 **NELSON & HOUMAND, P.C.**

18 /s/ Jacob L. Houmand
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22 *General Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee*
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28 ² 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.

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Approved As to Form and Content

OFFICE OF THE UNITED STATES TRUSTEE

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