

Exhibit A

1 Samuel A. Schwartz, Esq.
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8
9 **UNITED STATES BANKRUPTCY COURT**
FOR THE DISTRICT OF NEVADA

10
11 In re:) Case No.: 15-10110-LED
12)
12 AMERI-DREAM REALTY, LLC,) Chapter 7
13)
14 Debtor.)
15)
16 _____)
16 VICTORIA NELSON, In Her Capacity As The)
17 Chapter 7 Trustee Of AMERI-DREAM) Adv. Proceeding No.: 15-01087-LED
18 REALTY, LLC,)
19 Plaintiff,)
20)
21 vs.)
22)
23 ELSIE PELADAS-BROWN,)
24 Defendant.)
25 _____)

26
27 **DECLARATION OF JANINE LEE IN SUPPORT OF MOTION FOR AN**
ORDER ALLOWING SERVICE UPON DEFENDANT BY PUBLICATION

28
29 JANINE LEE, being duly sworn, deposes and says:

30 1. I am a paralegal at Schwartz Flansburg PLLC (“SF”), 6623 Las Vegas Blvd.
31 South, Suite 300, Las Vegas, Nevada 89119, the undersigned counsel for Chapter 7 Trustee
32 Victoria L. Nelson, the plaintiff in the above-captioned adversary proceeding.
33
34

1 2. I am over the age of 18, mentally competent, and unless otherwise indicated, I
2 have personal knowledge of the facts set forth herein.

3 3. On May 21, 2015, SF mailed a copy of the complaint to Ryan Works, Esq.,
4 counsel for Ameri-Dream Realty, LLC, and counsel for the defendant's ex-husband. SF also
5 inquired with Mr. Works regarding the whereabouts of the defendant.
6

7 4. On May 26, 2015, SF mailed a copy of the complaint to Lance Maningo, Esq., the
8 defendant's former divorce attorney. SF also inquired with Mr. Maningo regarding the
9 whereabouts of the defendant.
10

11 5. Due to inquiries made with Mr. Works and Mr. Maningo, SF obtained the last
12 known mailing address of the defendant, and on May 27, 2015, I mailed a copy of the summons
13 and complaint to the defendant at her last known address in Las Vegas, Nevada.
14

15 6. On May 29, 2015, SF inquired with Alex Villanueva, Esq., an attorney in Manila,
16 Philippines, regarding locating and serving the defendant in the Philippines. Mr. Villanueva
17 contacted a private investigation firm in the Philippines, but SF believes the cost and expense to
18 hire the private investigation firm will be significant with potentially no benefit, as SF is not
19 certain that Brown is residing in the Philippines.
20

21 7. On June 12, 2015, SF obtained the last known e-mail address of the defendant and
22 e-mailed the defendant a copy of the summons and complaint. The e-mail was not returned.
23

24 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
25 and correct.
26

27 Dated this 22nd day of June, 2015.
28

29
30
31 /s/ Janine Lee
32 Janine Lee
33
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