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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

**DECLARATION OF RYAN J. WORKS,
ESQ. IN SUPPORT OF MOTION FOR (1)
TURNOVER OF SECURITY DEPOSITS
HELD IN TRUST ACCOUNT OF
MCDONALD CARANO WILSON
PURSUANT TO 11 U.S.C. § 542 AND (2)
AUTHORITY TO ADMINISTER
SECURITY DEPOSITS THROUGH THE
DEBTOR'S BANKRUPTCY ESTATE
PURSUANT TO 11 U.S.C. § 105(a)**

Date of Hearing: November 3, 2015
Time of Hearing: 11:00 a.m.
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

23 I, Ryan J. Works, Esq., declare under penalty of perjury as follows:

24 1. I am over the age of 18 and mentally competent. Except where stated on
25 information and belief, I have personal knowledge of the facts in this matter and if called upon to
26 testify, could and would do so.

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1 2. I am an attorney licensed to practice law in the State of Nevada and admitted to
2 practice before this Court. I am a partner with the law firm of McDonald Carano Wilson
3 (“MCW”), counsel for the Debtor in the above-captioned bankruptcy case.

4 3. I make this declaration in support of the *Motion For (1) Turnover of Security*
5 *Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11 U.S.C. §542 and (2)*
6 *Authority to Administer Security Deposits Through the Debtor’s Bankruptcy Estate Pursuant to*
7 *11 U.S.C. § 105(a)* (the “Motion”).¹

8 4. Prior to the Petition Date, the remaining balance of the Security Deposits of
9 approximately \$707,567.29 were transferred to the IOLTA Trust Account of MCW.

10 5. As of the filing of this Motion, there is approximately \$707,567.29 remaining in
11 the IOLTA Trust Account of MCW.

12 6. I have no objection to the Trustee administering the remaining balance of the
13 Security Deposits in the Debtor’s bankruptcy case.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is
15 true and correct.

16 Executed this 30th day of September, 2015.

17 /s/ Ryan J. Works
18 Ryan J. Works, Esq.

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26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise stated herein, all
undefined, capitalized terms shall have the meaning ascribed to them in the Motion.