

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: September 30, 2015

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

13 **DECLARATION OF MARCIA UHRIG IN**
14 **SUPPORT OF MOTION FOR (1)**
15 **TURNOVER OF SECURITY DEPOSITS**
16 **HELD IN TRUST ACCOUNT OF**
17 **MCDONALD CARANO WILSON**
18 **PURSUANT TO 11 U.S.C. § 542 AND (2)**
19 **AUTHORITY TO ADMINISTER**
20 **SECURITY DEPOSITS THROUGH THE**
21 **DEBTOR'S BANKRUPTCY ESTATE**
22 **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, Marcia Uhrig, 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 set forth herein and if called upon
26 to testify, could and would do so.

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NELSON & HOUMAND, P.C.
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 2. I am an Assistant Director of Operations at The Garden City Group, LLC
2 (“GCG”), the Claims and Noticing Agent employed by Victoria L. Nelson, the Chapter 7 Trustee
3 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*
6 *(2) Authority to Administer Security Deposits Through the Debtor’s Bankruptcy Estate Pursuant*
7 *to 11 U.S.C. § 105(a)* (the “Motion”).¹

8 4. On February 9, 2015, the Trustee filed an *Application for Order Authorizing*
9 *Employment of Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 88]² (the
10 “Application to Employ GCG”). The Application to Employ GCG sought authority to employ
11 GCG as claims and noticing agent in the Debtor’s bankruptcy case.

12 5. On February 27, 2015, the Court entered an *Order Authorizing Employment of the*
13 *Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 128].

14 6. Since its employment, GCG has been collecting proofs of claim that have been
15 filed in the Debtor’s bankruptcy case.

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24 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
25 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
26 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
27 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.

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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7. As of the filing of the Motion, the total number of proofs of claim filed in the Debtor's bankruptcy case is 949 and the total monetary amount claimed is \$3,213,221. A true and correct copy of an alphabetical chart of the proofs of claim filed in the Debtor's bankruptcy case is attached hereto as **Exhibit "1"**.

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

Executed this 29th day of September, 2015.



Marcia Uhrig

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