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*Electronically Filed On: December 2, 2015*

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*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

**NOTICE OF RECEIPT OF SECURITY  
DEPOSITS PREVIOUSLY HELD IN  
TRUST ACCOUNT OF MCDONALD  
CARANO WILSON LLP**

Date of Hearing: N/A  
Time of Hearing: N/A

Judge: Honorable Laurel E. Davis<sup>1</sup>

Victoria L. Nelson, the appointed Chapter 7 Trustee in the above-captioned bankruptcy case (the “Trustee”) hereby files this *Notice of Receipt of Security Deposits Previously Held In Trust Account of McDonald Carano Wilson LLP* (the “Notice”).<sup>2</sup>

On September 30, 2015, the Trustee filed the *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*

<sup>1</sup> 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 will be referred to as the “Local Rules.”

<sup>2</sup> 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.

1 *11 U.S.C. § 105(a)* [ECF No. 181] (the “Motion for Turnover”). The purpose of the Motion for  
2 Turnover was twofold: (a) permitting the remaining balance of security deposits in the  
3 approximate amount of \$707,567.29 (the “Security Deposits”) currently held in the IOLTA  
4 Account of McDonald Carano Wilson, the Debtor’s bankruptcy counsel, to be turned over to the  
5 Trustee and (b) obtaining an order allowing the Trust Funds to be administered for the benefit of  
6 the Debtor’s creditors. On November 6, 2015, the Court entered an *Order Granting Motion For*  
7 *(1) Turnover of Security Deposits Held In Trust Account of McDonald Carano Wilson Pursuant*  
8 *to 11 U.S.C. § 542 and (2) Authority to Administer Security Deposits Through the Debtor’s*  
9 *Bankruptcy Estate Pursuant to 11 U.S.C. § 105(a)* [ECF No. 196] (the “Order Granting Motion  
10 for Turnover”). The Order Granting Motion for Turnover provided that “[t]he Security Deposits  
11 shall be transferred to the Trustee on the fifteenth (15) day after entry of this Order.” *See* Order  
12 Granting Motion for Turnover, p. 4, ll. 3-4.

13 On November 25, 2015, the Trustee received a wire transfer in the amount of \$707,567.29  
14 from the IOLTA Trust Account for the law firm of McDonald Carano Wilson LLP pursuant to the  
15 terms of the Order Granting Motion for Turnover. The current balance in the trust account  
16 maintained by the Trustee in the above-captioned bankruptcy estate is \$807,093.69.

17 Dated this 2nd day of December, 2015.

18 **CHAPTER 7 TRUSTEE**

19 */s/ Victoria L. Nelson*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of December, 2015, I caused to be served a true and correct copy of the NOTICE OF RECEIPT OF SECURITY DEPOSITS PREVIOUSLY HELD IN TRUST ACCOUNT OF MCDONALD CARANO WILSON in the following manner:

(ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

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5  (UNITED STATES MAIL) By depositing a copy of the above-referenced document for  
6 mailing in the United States Mail, first class postage prepaid, to the parties listed below, at their  
7 last known mailing addresses, on the date above written.

8 i. Office of United States Trustee  
9 300 Las Vegas Boulevard South, Suite 4300  
10 Las Vegas, NV 89101

11 ii. Department of Employment, Training & Rehab  
12 Employment Security Division  
13 500 East Third Street  
14 Carson City, NV 89713

15 iii. Internal Revenue Service  
16 P.O. Box 7346  
17 Philadelphia, PA 19101-7346

18 iv. Nevada Department of Taxation  
19 Attn: Bankruptcy Section  
20 555 E. Washington Ave., #1300  
21 Las Vegas, NV 89101

22 v. Clark County Assessor  
23 c/o Bankruptcy Clerk  
24 500 S Grand Central Pkwy  
25 Box 551401  
26 Las Vegas, NV 89155-1401

27  (OVERNIGHT COURIER) By depositing a true and correct copy of the above-  
28 referenced document for overnight delivery via Federal Express, at a collection facility  
maintained for such purpose, addressed to the parties on the attached service list, at their last  
known delivery address, on the date above written.

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

*/s/ Victoria L. Nelson*  
Victoria L. Nelson, Chapter 7 Trustee