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Attorneys for Defendants  
XL AMERICA, INC., XL INSURANCE AMERICA, INC.,  
XL SELECT PROFESSIONAL, PEARL INSURANCE GROUP, LLC,  
GREENWICH INSURANCE GROUP

**UNITED STATES BANKRUPTCY COURT**  
**FOR THE DISTRICT OF NEVADA**

In re:  
AMERI-DREAM REALTY, LLC  
Debtor.

Case No.: 15-10110-led  
Chapter 7  
Adversary Proceeding No. 15-01183-led

VICTORIA NELSON, In Her Capacity As The  
Chapter 7 Trustee Of AMERI-DREAM  
REALTY, LLC,

Plaintiff,

v.

XL AMERICA, INC.; XL INSURANCE  
AMERICA, INC.; XL SELECT  
PROFESSIONAL; PEARL INSURANCE  
GROUP, LLC; GREENWICH INSURANCE  
COMPANY; and DOES I through X; and ROE  
CORPORATE DEFENDANTS XI through XX,

Defendants.

**EX PARTE MOTION FOR ORDER  
SHORTENING TIME FOR HEARING ON  
DEFENDANTS MOTION TO WITHDRAW  
THE REFERENCE OF THIS ADVERSARY  
PROCEEDING PURSUANT TO 28 U.S.C. §  
157(d) AND FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 5011**

Defendants XL AMERICA, INC., XL INSURANCE AMERICA, INC., XL SELECT  
PROFESSIONAL, PEARL INSURANCE GROUP, LLC, and GREENWICH INSURANCE  
GROUP (“Defendants”), by and through their counsel of record, hereby moves this Court for entry  
of an Order Shortening Time to set an expedited hearing on Defendants’ Motion to Withdraw the  
Reference of this Adversary Proceeding Pursuant to 28 U.S.C. § 157(d) and Federal Rule of  
Bankruptcy Procedure 5011 (DE #20) (“Withdrawal Motion”).

1 This motion requests that the Withdrawal Motion be heard on shortened time **on or before**  
2 **January 7, 2016.**

3 The request for shortened time is made pursuant to Rule 9006 of the Federal Rules of  
4 Bankruptcy Procedure, the Attorney Information Sheet for OT Motion filed contemporaneously  
5 herewith, the Affidavit of Vernon A. Nelson, Jr., Esq. ("Nelson Afft.") filed contemporaneously  
6 herewith, and the Withdrawal Motion.

7 The basis for this motion is the following:

8 1. The Withdrawal Motion seeks to withdraw reference to Bankruptcy Court. Nelson  
9 Afft. at ¶ 3.

10 2. The Withdrawal Motion is straightforward. *Id.* at ¶ 4.

11 3. Trustee has filed a Motion for Summary Judgment in Bankruptcy Court (DE #16).  
12 The Withdrawal Motion should be heard on a shortened time to avoid any ambiguity as to  
13 Defendants' obligation to respond to the Motion for Summary Judgment. *Id.* at ¶ 5.

14 4. Based on the foregoing, it is respectfully submitted that good cause exists for granting  
15 an order shortening time. *Id.* at ¶ 6.

16 WHEREFORE, the Trustee respectfully requests that this Honorable Court issue an order  
17 shortening time so that the Withdrawal Motion can be heard in a timely manner.

18 DATED this 23rd day of December, 2015.

19 WILSON ELSER MOSKOWITZ EDELMAN &  
20 DICKER LLP

21 /s/ Vernon A. Nelson, Jr.

22 Vernon A. Nelson, Jr., Esq.

23 Nevada Bar No. 6434

24 300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor

25 Las Vegas, Nevada 89101

26 Telephone: (702) 727-1400

27 Attorneys for Defendants

28 XL AMERICA, INC., XL INSURANCE

AMERICA, INC.,

XL SELECT PROFESSIONAL, PEARL

INSURANCE GROUP, LLC,

GREENWICH INSURANCE GROUP

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP, and that on this 23rd day of December, 2015, I served a true and correct copy of the foregoing **EX PARTE MOTION FOR ORDER SHORTENING TIME FOR HEARING ON DEFENDANTS MOTION TO WITHDRAW THE REFERENCE OF THIS ADVERSARY PROCEEDING PURSUANT TO 28 U.S.C. § 157(d) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 5011** as follows:

by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

via electronic means by operation of the Court’s electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Samuel A. Schwartz, Esq.  
Schwartz Flansburg PLLC  
Email: sam@nvfirm.com  
Attorney for Chapter 7 Trustee, Victoria L. Nelson

via hand-delivery to the addressees listed below;

via facsimile;

by transmitting via email the document listed above to the email address set forth below on this date:

BY:     /s/ Lani Maile      
An Employee of  
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

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COMPANY; and DOES I through X; and ROE  
CORPORATE DEFENDANTS XI through XX,

Defendants.

**AFFIDAVIT OF  
VERNON A. NELSON, JR., ESQ.**

STATE OF NEVADA        )  
                                  )        SS.  
COUNTY OF CLARK        )

VERNON A. NELSON, JR., ESQ., being first sworn, deposes and says:

1. I am the lead attorney with Wilson Elser Moskowitz Edelman & Dicker LLP,  
counsel for Defendants XL AMERICA, INC., XL INSURANCE AMERICA, INC., XL SELECT

1 PROFESSIONAL, PEARL INSURANCE GROUP, LLC, GREENWICH INSURANCE GROUP in  
2 the above-captioned matter (“Defendants”).

3 2. I make this affidavit in support of the Ex Parte Motion for Order Shortening Time for  
4 Hearing on Defendants’ MOTION TO WITHDRAW REFERENCE OF THIS ADVERSARY  
5 PROCEEDING PURSUANT TO 28 U.S.C. § 157(d) AND FEDERAL RULE OF BANKRUPTCY  
6 PROCEDURE 5011 (“Withdrawal Motion”), and make these statements based on my personal  
7 knowledge, except as to those matters stated upon information and belief.

8 3. The Withdrawal Motion seeks to withdraw reference to Bankruptcy Court.

9 4. The Withdrawal Motion is straightforward.

10 5. Trustee has filed a Motion for Summary Judgment in Bankruptcy Court (DE #16).  
11 The Withdrawal Motion should be heard on shortened time to avoid any ambiguity as to Defendants’  
12 obligation to respond to the Motion for Summary Judgment.

13 6. Based on the foregoing, it is respectfully submitted that good cause exists for  
14 granting an order shortening time.

15 \_\_\_\_\_  
VERNON A. NELSON, JR.

16 SUBSCRIBED AND SWORN to before  
17 me this 23<sup>rd</sup> day of December, 2015.

18 \_\_\_\_\_  
19 Notary Public

