

Vernon A. Nelson, Jr., Esq.  
Nevada Bar No. 6434  
Email: Vernon.Nelson@wilsonelser.com  
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
300 South 4th Street, 11th Floor  
Las Vegas, NV 89101-6014  
Telephone: (702) 727-1400  
Facsimile: (702) 727-1401

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.

**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 28th day of December, 2015, I served a true and  
correct copy of the **ORDER GRANTING DEFENDANTS' MOTION FOR ORDER  
SHORTENING TIME** 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;



# EXHIBIT A

**Maile, Lani**

---

**From:** Maile, Lani  
**Sent:** Monday, December 28, 2015 1:51 PM  
**To:** 'Sam@NVFirm.com'  
**Cc:** Nelson, Vernon A.; Gourley, Annemarie  
**Subject:** Victoria Nelson v. XL America, Inc., et al. - Adv. No. 15-01183-led  
**Attachments:** Doc 30 ORD Granting DEFS MOT for OST.pdf

Dear Counsel:

Attached please find the Order Granting Defendants' Motion for Order Shortening Time that was filed and entered by the Court in the above-referenced matter.

A copy of the attached Order will follow via facsimile.

Thank you.

Lani Maile  
Paralegal  
Wilson Elser Moskowitz Edelman & Dicker LLP  
300 South 4th Street - 11th Floor  
Las Vegas, NV 89101-6014  
702.727.1262 (Direct)  
702.727.1400 (Main)  
702.727.1401 (Fax)  
[lanimaile@wilsonelser.com](mailto:lanimaile@wilsonelser.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Honorable Laurel E. Davis  
United States Bankruptcy Judge



Entered on Docket  
December 28, 2015

Vernon A. Nelson, Jr., Esq.  
Nevada Bar No. 6434  
Email: Vernon.Nelson@wilsonelser.com  
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
300 South 4th Street, 11th Floor  
Las Vegas, NV 89101-6014  
Telephone: (702) 727-1400  
Facsimile: (702) 727-1401

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.

**ORDER SHORTENING THE 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, JURY  
DEMAND, AND SUPPORTING  
MEMORANDUM OF LAW**

Date: January 11, 2016  
Time: 1:30 p.m.

1 The Court having considered Defendants' MOTION TO WITHDRAW THE REFERENCE  
2 OF THIS ADVERSARY PROCEEDING PURSUANT TO 28 U.S.C. § 157(d) AND FEDERAL  
3 RULE OF BANKRUPTCY PROCEDURE 5011, JURY DEMAND, AND SUPPORTING  
4 MEMORANDUM OF LAW (DE #20) (hereinafter the "Withdrawal Motion") and good cause  
5 appearing:

6 IT IS HEREBY ORDERED that the Withdrawal Motion shall be heard on the 11th day of  
7 January, 2016, at 1:30 p.m.; it is further

8 ORDERED that any objections to the Withdrawal Motion shall be due on the 4th day of  
9 January, 2016; it is further

10 ORDERED that responses to any objections to the Withdrawal Motion shall be due on the  
11 8th day of January, 2016; it is further

12 ORDERED that the service of this Order must be completed by the 28th day of  
13 December, 2015.

14 IT IS SO ORDERED.

15  
16 Respectfully Submitted by:

17 WILSON ELSER MOSKOWITZ EDELMAN  
18 & DICKER LLP

19 /s/ Vernon A. Nelson, Jr.  
20 Vernon A. Nelson, Jr., Esq.  
21 Nevada Bar No. 6434  
22 300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 727-1400

23 Attorneys for Defendants  
24 XL AMERICA, INC., XL INSURANCE AMERICA, INC.,  
25 XL SELECT PROFESSIONAL, PEARL INSURANCE GROUP, LLC,  
26 GREENWICH INSURANCE GROUP  
27  
28

# EXHIBIT B

\*\*\*\*\*  
\*\*\* TX Result Report \*\*\*  
\*\*\*\*\*

Sending is complete.

Job Number 0403  
Address 7023852741  
Name  
Start Time 12/28 02:57 PM  
Call Length 00'38  
Sheets 3  
Result OK



FACSIMILE

300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor  
Las Vegas, NV 89101-6014

Telephone #: 702.727.1400  
Facsimile #: 702.727.1401

The following facsimile has 3 page(s) including this cover page. If you have any difficulty, or if the transmission was incomplete, please advise: I.ani Maile at (702) 727-1262.

From: Vernon A. Nelson, Jr. Date: December 28, 2015  
Attorney #: 7474 File #: 08664.00940  
Re: Order Granting Defendants' Motion for Order Shortening Time  
Case No. 15-01183-led

Please deliver as soon as possible to:

Recipient	Company	Fax No.	Phone No.
Samuel A. Schwartz, Esq.	Schwartz Flansburg PLLC	702-385-2741	702-385-5544

Dear Counsel:

Attached please find an Order Granting Defendants' Motion for Order Shortening Time.

Thank you.





FACSIMILE

300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor  
Las Vegas, NV 89101-6014

Telephone #: 702.727.1400  
Facsimile #: 702.727.1401

The following facsimile has 3 page(s) including this cover page. If you have any difficulty, or if the transmission was incomplete, please advise: Lani Maile at (702) 727-1262.

From: Vernon A. Nelson, Jr. Date: December 28, 2015  
Attorney #: 7474 File #: 08664.00940  
Re: Order Granting Defendants' Motion for Order Shortening Time  
Case No. 15-01183-led

Please deliver as soon as possible to:

Recipient	Company	Fax No.	Phone No.
Samuel A. Schwartz, Esq.	Schwartz Flansburg PLLC	702-385-2741	702-385-5544

Dear Counsel:

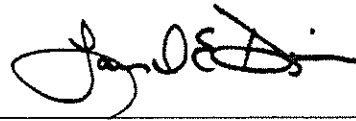
Attached please find an Order Granting Defendants' Motion for Order Shortening Time.

Thank you.

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us via postal service. Thank you.

Albany • Austin • Baltimore • Beaumont • Boston • Chicago • Dallas • Denver • Edwardsville • Garden City • Hartford • Houston • Kentucky • Las Vegas • London • Los Angeles • Miami • Milwaukee • New Jersey • New York • Orlando • Philadelphia • San Diego • San Francisco • Stamford • Virginia • Washington, DC • West Palm Beach • Wichita Falls

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



Honorable Laurel E. Davis  
United States Bankruptcy Judge



Entered on Docket  
December 28, 2015

Vernon A. Nelson, Jr., Esq.  
Nevada Bar No. 6434  
Email: Vernon.Nelson@wilsonelser.com  
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
300 South 4th Street, 11th Floor  
Las Vegas, NV 89101-6014  
Telephone: (702) 727-1400  
Facsimile: (702) 727-1401

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.

**ORDER SHORTENING THE 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, JURY  
DEMAND, AND SUPPORTING  
MEMORANDUM OF LAW**

Date: January 11, 2016  
Time: 1:30 p.m.

1 The Court having considered Defendants' MOTION TO WITHDRAW THE REFERENCE  
2 OF THIS ADVERSARY PROCEEDING PURSUANT TO 28 U.S.C. § 157(d) AND FEDERAL  
3 RULE OF BANKRUPTCY PROCEDURE 5011, JURY DEMAND, AND SUPPORTING  
4 MEMORANDUM OF LAW (DE #20) (hereinafter the "Withdrawal Motion") and good cause  
5 appearing:

6 IT IS HEREBY ORDERED that the Withdrawal Motion shall be heard on the 11th day of  
7 January, 2016, at 1:30 p.m.; it is further

8 ORDERED that any objections to the Withdrawal Motion shall be due on the 4th day of  
9 January, 2016; it is further

10 ORDERED that responses to any objections to the Withdrawal Motion shall be due on the  
11 8th day of January, 2016; it is further

12 ORDERED that the service of this Order must be completed by the 28th day of  
13 December, 2015.

14 IT IS SO ORDERED.

15

16 Respectfully Submitted by:

17 WILSON ELSER MOSKOWITZ EDELMAN  
18 & DICKER LLP

19 /s/ Vernon A. Nelson, Jr.  
20 Vernon A. Nelson, Jr., Esq.  
21 Nevada Bar No. 6434  
22 300 South 4<sup>th</sup> Street, 11<sup>th</sup> Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 727-1400

23 Attorneys for Defendants  
24 XL AMERICA, INC., XL INSURANCE AMERICA, INC.,  
25 XL SELECT PROFESSIONAL, PEARL INSURANCE GROUP, LLC,  
26 GREENWICH INSURANCE GROUP  
27  
28