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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 VICTORIA L. NELSON IN SUPPORT OF TRUSTEE'S EX PARTE APPLICATION FOR AUTHORIZATION TO RECEIVE AND TRANSFER CERTAIN FUNDS

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

Judge: Honorable Laurel E. Davis¹

17 I, Victoria L. Nelson, declare as follows:

18 1. I am over the age of 18 years and I am competent to make this declaration. I have
19 personal knowledge of the facts set forth herein, except for those facts stated on information and
20 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I
21 could and would testify as to the matters set forth below based upon my personal knowledge.

22 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

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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." The Local Rules of Practice for the United
States Bankruptcy Court for the District of Nevada shall be referred to as the "Local Rules."

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1 3. I make this declaration in support of the *Ex Parte Application for Authorization to*
2 *Receive and Transfer Certain Funds* (the "Application").²

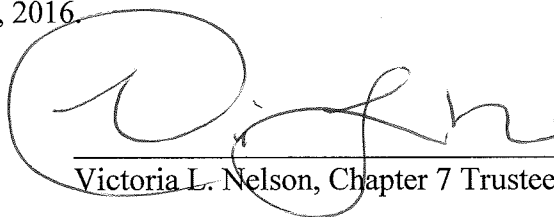
3 4. I have reviewed the checks and related invoices that are attached as **Exhibit "1"** to
4 the Works Declaration.

5 5. I believe that a court order permitting me to negotiate the XL Insurance Checks so
6 that the funds can be transferred to the law firm of McDonald Carano Wilson ("MCW") is in the
7 best interests of creditors and the Debtor's bankruptcy estate. This is because the XL Insurance
8 Checks relate to work that was performed by MCW and the amounts at issue are *de minimus*.

9 6. In the event that this application is denied, MCW would likely assert the amounts
10 as an administrative claim against the estate; therefore, the Court should grant the relief requested,
11 and authorize me to negotiate the insurance checks for the benefit of MCW.

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

14 Dated this 27 day of April, 2016.

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16 _____
17 Victoria L. Nelson, Chapter 7 Trustee

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28 ² Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to them in the Application.

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