

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.

**STIPULATION REGARDING
DEFENDANTS' MOTION TO WITHDRAW
REFERENCE AND OTHER PENDING
MOTIONS**

Hearing Date: March 21, 2016
Hearing Time: 1:30 p.m.

XL America, Inc., XL Insurance America, Inc., XL Select Professional, Pearl Insurance Group, LLC and Greenwich Insurance Company (collectively, the "Defendants"), by and through their attorneys of record, Wilson Elser Moskowitz Edelman & Dicker LLP, and Victoria L. Nelson, in her capacity as the Chapter 7 Trustee (the "Plaintiff" or the "Trustee") of Ameri-Dream, LLC (the "Debtor" or the "Company"), by and through her attorneys of record, Schwartz Flansburg PLLC, hereby stipulate and agree to the following:

1 WHEREAS, on January 9, 2015, the Company filed a voluntary petition for relief under
2 Chapter 7 of the United States Bankruptcy Code, whereby the Trustee was appointed as Chapter 7
3 Trustee;

4 WHEREAS, on October 29, 2015, the Trustee initiated the above-captioned adversary
5 complaint (the "Complaint") against the Defendants, thereby commencing this adversary proceeding
6 (the "Adversary Proceeding");

7 WHEREAS, on December 22, 2015, the Trustee filed her Motion for Summary Judgment
8 (the "MSJ");

9 WHEREAS, on December 23, 2015, the Defendants filed their Motion to Withdraw the
10 Reference of this Adversary Proceeding (the "Withdrawal Motion");

11 WHEREAS, on December 23, 2015, Defendants XL America, Inc., XL Insurance America,
12 Inc., XL Select Professional and Pearl Insurance Group, LLC filed their Motion to Dismiss the
13 Complaint, and that same day, Defendant Greenwich Insurance Company filed its Motion to Dismiss
14 the Complaint (collectively, the "MTDs");

15 WHEREAS, on December 28, 2015, this Court entered an order shortening time (the "OST")
16 for hearing on the Withdrawal Motion, setting a hearing for January 11, 2016, at 1:30 p.m., and
17 setting opposition and reply briefing deadlines for January 4, 2016, and January 8, 2016,
18 respectively;

19 WHEREAS, on December 30, 2015, the parties filed a Stipulation Regarding Defendants'
20 Motion to Withdraw the Reference and Other Pending Motions (the "Stipulation");

21 WHEREAS, on December 31, 2015, the Court entered an Order Approving the Stipulation
22 (the "Order");

23 WHEREAS, the Order vacated the January 11, 2016 hearing on the Withdrawal Motion.

24 WHEREAS, on January 8, 2016, the Clerk of this Court transmitted the Withdrawal Motion
25 to the Clerk of the District Court.

26 WHEREAS, on January 25, 2016, the Trustee filed her Opposition to the Withdrawal Motion
27 in the district court.

28 WHEREAS, on February 7, 2016, Defendants filed their Reply in Support of their

1 Withdrawal Motion in the district court.

2 WHEREAS, the Withdrawal Motion has not yet been ruled on by the district court; and

3 WHEREAS, the parties also desire to stipulate and agree that once the Withdrawal Motion is
4 heard and decided by the district court, the parties will agree to the appropriate hearing dates and
5 briefing deadlines for the MSJ and MTDs, either before the district court or the bankruptcy court,
6 pending the outcome of the Withdrawal Motion.

7 NOW, THEREFORE, the Trustee and Defendants hereby stipulate and agree to the
8 following, and concurrently seek this Court's approval of the same.

9 IT IS HEREBY STIPULATED AND AGREED that pending the district court's decision on
10 the Withdrawal Motion, this Court's hearing on the MSJ and MTDs, currently scheduled for March
11 21, 2016, at 1:30 p.m., shall be vacated and continued to April 29, 2016, or a date available as set by
12 this Court; and

13 IT IS FURTHER STIPULATED AND AGREED that pending the district court's decision on
14 the Withdrawal Motion, the parties shall address appropriate hearing dates and briefing deadlines for
15 the MSJ and MTDs;

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1 IT IS FURTHER STIPULATED AND AGREED that the Scheduling Conference, currently
2 scheduled for March 21, 2016, at 1:30 p.m. shall be vacated and continued to April 29, 2016, or a
3 date available as set by the court.

4 WILSON ELSER MOSKOWITZ EDELMAN & THE SCHWARTZ LAW FIRM
5 DICKER LLP

6 /s/ Vernon A. Nelson, Jr.
7 Vernon A. Nelson, Jr., Esq.
8 Nevada Bar No. 6434
9 300 South 4th Street, 11th Floor
10 Las Vegas, Nevada 89101
11 Telephone: (702) 727-1400
12 Attorneys for Defendants

/s/ Bryan A. Lindsey
Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
6623 Las Vegas Blvd., South, Suite 300
Las Vegas, Nevada 89119
Attorneys for Chapter 7 Trustee

11 Date: March 18, 2016.

Date: March 18, 2016.

12
13 Respectfully submitted by:

14 WILSON ELSER MOSKOWITZ EDELMAN
15 & DICKER LLP

16 /s/ Vernon A. Nelson, Jr.
17 Vernon A. Nelson, Jr., Esq.
18 Nevada Bar No. 6434
19 300 South 4th Street, 11th Floor
20 Las Vegas, Nevada 89101
21 Telephone: (702) 727-1400
22 Attorneys for Defendants
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25
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