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Electronically Filed On: June 1, 2017

6 *Counsel for Victoria L. Nelson, Chapter 7 Trustee*

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-GS
Chapter 7

**STIPULATION RESOLVING
OBJECTIONS TO PROOFS OF CLAIM
NUMBERS 235, 236, AND 237 FILED BY
ESPERANZA SAMILIN**

Judge: Honorable Gary Spraker

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16 VICTORIA L. NELSON, the duly appointed Chapter 7 Trustee in the above-captioned
17 bankruptcy case (the "Trustee"), by and through her counsel of record, Jacob L. Houmand, Esq.
18 and Kyle J. Ortiz, Esq., of the law firm of Nelson & Houmand, P.C., and ESPERANZA
19 SAMILIN (the "Claimant"), (the Trustee and the Claimant shall be collectively referred to herein
20 as the "Parties"), hereby stipulate and agree as follows:

21 **I. RECITALS**

22 1. On January 9, 2015 (the "Petition Date"), Ameri-Dream Realty, LLC (the
23 "Debtor") filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code [ECF
24 No. 1]¹.

25 2. On January 9, 2015, the Trustee was appointed as the Chapter 7 Trustee in the
26 Bankruptcy Case.

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28 ¹ 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.

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1 3. Since the Debtor’s bankruptcy case was deemed a mega case, the Trustee sought
2 and obtained court approval to employ Garden City Group, LLC (“GCG”) as the claims and
3 noticing agent.

4 4. The deadline to timely file proofs of claim expired on May 14, 2015. Upon the
5 expiration of the deadline to file proofs of claims, GCG filed the proofs of claims with the Court.

6 5. The Claimant timely filed the following proofs of claims claiming priority under
7 Section 507(a)(4) in the following amounts:

- 8 (a) Claim 235: \$3,750.00
- 9 (b) Claim 236: \$10,055.00
- 10 (c) Claim 237: \$4,350.00

11 (collectively, the “Proofs of Claim”)

12 6. The Trustee has reviewed the Proofs of Claim and raised informal objections as the
13 Proofs of Claim seek a priority in the amount of \$18,155.00, which exceeds the maximum amount
14 allowed under 11 U.S.C. § 507(a)(4) of \$12,475.00.

15 7. The Trustee has discussed the informal objections with Claimant.

16 8. The Parties have conferred and agree to resolve the Trustee’s informal objections
17 to the Proofs of Claim upon the terms and conditions set forth below.

18 WHEREFORE, in consideration of the foregoing and subject to the approval of this Court,
19 the Trustee and Claimant hereby stipulate and agree as follows:

20 **II. STIPULATION**

21 1. **Amendment of Proof of Claim 235.** Upon Court approval of this Stipulation,
22 Proof of Claim 235 shall be allowed as follows: (i) an allowed priority claim under 11 U.S.C.
23 § 507(a)(4) in the amount of \$2,420.00; and (ii) an allowed general unsecured claim in the
24 amount of \$1,330.00.

25 2. **Allowance of Proof of Claim 236.** Upon Court approval of this Stipulation, Proof
26 of Claim 236 shall be allowed and entitled to priority under 11 U.S.C. § 507(a)(4).

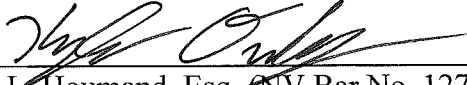
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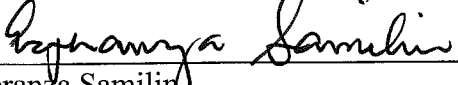
3. Allowance of Proof of Claim 237 As General Unsecured Claim. Upon Court approval of this Stipulation, Proof of Claim 237 shall not be entitled to any priority under 11 U.S.C. § 507(a)(4) and shall be allowed as a general unsecured claim in the amount of \$4,350.00.

IT IS SO STIPULATED.

Dated this 23rd day of May, 2017.

Dated this 28th day of May, 2017.

By: 
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