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Electronically Filed On: February 20, 2015

5 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*

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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

AFFIDAVIT OF JACOB L. HOUMAND,
ESQ. IN SUPPORT OF EX PARTE
APPLICATION FOR ORDER
SHORTENING TIME ON APPLICATION
FOR ORDER AUTHORIZING
EMPLOYMENT OF THE GARDEN CITY
GROUP, LLC AS CLAIMS AND
NOTICING AGENT

Date of Hearing: *OST Pending*
Time of Hearing: *OST Pending*
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

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22 STATE OF NEVADA)
23 COUNTY OF CLARK) ss:

24 I, Jacob L. Houmand, Esq., under oath and under penalty of perjury say:

25 1. I am an attorney duly licensed to practice law in the State of Nevada.

26 2. I am a shareholder with the law firm of Nelson & Houmand, P.C. (the "Firm"),
27 proposed counsel of record for Victoria L. Nelson, the duly appointed Chapter 7 Trustee in the
28 above-captioned bankruptcy case (referred to herein as the "Trustee").

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1 3. I have personal knowledge of the facts set forth herein.

2 4. I make this Affidavit in Support of the Ex Parte Application for Order Shortening
3 Time on Application for Order Authorizing Employment of the Garden City Group, LLC As
4 Claims and Noticing Agent (the "Application").¹

5 5. On February 9, 2015, the Trustee filed the Application for Order Authorizing
6 Employment of the Garden City Group, LLC As Claims and Noticing Agent (the "Application to
7 Employ") [ECF No. 88].

8 6. The Application to Employ seeks authority to employ Garden City Group, LLC
9 ("Garden City") as claims and noticing agent for the bankruptcy estate.

10 7. The hearing date on the Application is currently scheduled for March 31, 2015, at
11 2:30 p.m. In order to facilitate the collection and administration of the proofs of claims that have
12 been filed with the bankruptcy court, the Trustee seeks to have the Application to Employ heard
13 on shortened time.

14 8. Permitting the Application to Employ to be heard on shortened time will also allow
15 Garden City to send an amended proof of claim form to creditors and parties-in-interest.

16 9. The Trustee is also informed that the Court believes that allowing the Application
17 to Employ to be heard on shortened time will assist with the administration of the Debtor's
18 bankruptcy case.

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25 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
26 U.S.C. §§ 101-1532. The Federal Rules of Civil Procedure shall be referred to as "FRCP" and the
27 Federal Rules of Bankruptcy Procedure shall be referred to as "FRBP." The Local Rules of
28 Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as
the "Local Rules." In addition, all defined terms in this Affidavit shall have the same meaning
ascribed to them in the Application.

1 10. For these reasons, the Court should issue an order shortening time and permit the
2 Application to Employ to be heard on shortened time pursuant to FRBP 9006.

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

5 FURTHER AFFIANT SAYETH NAUGHT.

6
7 
8 Jacob L. Houmand, Esq.

9 SUBSCRIBED AND SWORN TO
10 before me this 20th day of February, 2015.



11 
12 Notary Public

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