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Electronically Filed On: February 5, 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

**DECLARATION OF VICTORIA L.
NELSON IN SUPPORT OF TRUSTEE'S
APPLICATION FOR ORDER LIMITING
NOTICE**

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

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

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

2 3. I make this declaration in support of the Trustee's Ex Parte Application to Limit
3 Notice (the "Application").²

4 4. On January 9, 2015, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7
5 of Title 11 of the United States Code [ECF No. 1].³

6 5. On January 9, 2015, I was appointed as the Chapter 7 Trustee in the Debtor's
7 bankruptcy case [ECF No. 4].

8 6. The Debtor is a real estate brokerage firm that represented clients in the purchase
9 and sale of real property throughout Las Vegas, Nevada.

10 7. The Debtor also had a property management division that managed hundreds of
11 rental properties for various landowners and tenants throughout the valley in Las Vegas, Nevada.

12 8. At the time of the Debtor's bankruptcy filing, it was a party to hundreds of
13 property management agreements.

14 9. The mailing matrix currently consists of approximately Two Thousand Eight
15 Hundred (2,800) creditors and/or parties in interest.

16 10. In order to provide notice to the entire mailing matrix, it will cost the bankruptcy
17 estate a minimum of approximately One Thousand Three Hundred Fifty Dollars (\$1,350.00) per
18 mailing.

19 11. I have established and am maintaining a website containing general information
20 regarding the bankruptcy case including scheduled up-coming hearings which is located at
21 <http://nelsonhoumand.com/ameri-dream-realty-llc>. I have also established and am maintaining a
22 website which provides the entire court docket in which parties can view the pleadings filed in
23

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

26 ² All defined terms herein shall have the same meaning ascribed to them in the Application unless
otherwise provided.

27 ³ All references to "ECF No." are to the numbers assigned to the documents filed in the case as
28 they appear on the docket maintained by the clerk of the court.

1 this bankruptcy case which is located at <http://nelsonhoumand.com/ameri-dream-realty-court->
2 [documents.](http://nelsonhoumand.com/ameri-dream-realty-court-)


3 12. The application of the notice procedures as set forth in the Application is
4 especially appropriate in a case of this size and magnitude, where providing notice of every
5 matter to thousands of creditors and interested parties would be unjustifiably burdensome and
6 economically infeasible for the bankruptcy estate.

7 13. I propose to establish an Official Service List, a copy of which is attached hereto
8 as **Exhibit "1."** The Official Service List will include the Debtor's counsel of record, parties in
9 interest who formally request notice by filing a written request for notice with the Clerk of the
10 Court, and other governmental agencies required to receive notice of proceedings under the
11 Bankruptcy Rules and Local Bankruptcy Rules. The parties in interest required to receive notice
12 of proceedings would be limited to those parties included on the Official Service List, those filing
13 a notice of appearance and request for service, and any other persons whose rights or interests are
14 directly affected by any particular proceeding in these cases.

15 14. I further request that the Court approve as to form the *Notice of Requirement for*
16 *Filing Written Request with Court to be Included on Official Service List for Notice of*
17 *Proceedings* (the "Notice") attached hereto as **Exhibit "2."**

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

20 Dated this 3rd day of February, 2015.

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22 _____
23 Victoria L. Nelson
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EXHIBIT “1”

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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

13
14 **OFFICIAL SERVICE LIST FOR AMERI-DREAM REALTY, LLC**
15 **(AS OF FEBRUARY 5, 2015)**

16 **Debtor's Counsel**

17 Ryan J. Works, Esq.
McDonald Carano Wilson, LLP
18 2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102

19
20 **United States Trustee**

21 Office of United States Trustee
300 Las Vegas Boulevard South, Suite 4300
22 Las Vegas, NV 89101

23 **Parties Requesting Notice**

24 Richard F. Holley, Esq.
Holley, Driggs, Walch, Puzey, Thompson
25 400 South Fourth Street, 3rd Floor
26 Las Vegas, NV 89101

27 Tara D. Newberry, Esq.
Connaghan Newberry Law Firm
28 7854 W. Sahara Avenue
Las Vegas, NV 89117

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1 **Governmental Agencies**

2 Dept. of Employment, Training & Rehab
3 Employment Security Division
4 500 East Third Street
5 Carson City, NV 89713

6 Internal Revenue Service
7 P.O. Box 7346
8 Philadelphia, PA 19101-7346

9 Nevada Department of Taxation
10 Attn: Bankruptcy Section
11 555 E. Washington Ave., #1300
12 Las Vegas, NV 89101

13 Clark County Assessor
14 c/o Bankruptcy Clerk
15 500 S Grand Central Pkwy
16 Box 551401
17 Las Vegas, NV 89155-1401

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EXHIBIT “2”

1 Jacob L. Houmand, Esq. (NV Bar No. 12781)
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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

13 **NOTICE OF REQUIREMENT FOR**
14 **FILING WRITTEN REQUEST WITH**
15 **COURT TO BE INCLUDED ON**
16 **OFFICIAL SERVICE LIST FOR NOTICE**
17 **OF PROCEEDINGS**

Judge: Honorable Laurel E. Davis

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19 **TO ALL PARTIES IN INTEREST:**

20 **PLEASE TAKE NOTICE** that the United State Bankruptcy Court for the District of
21 Nevada (the "Court") has issued an Order Establishing Noticing Requirements with respect to the
22 above-styled bankruptcy proceedings (the "Notice Order"). In accordance with the Notice Order,
23 notice of all future proceedings in which case shall be given only to those creditors and parties in
24 interest that are listed on the Official Service List, and those who file with the Court and serve on
25 the undersigned counsel a written request to be included in the Official Service List to be
26 established in this case. The Official Service List will initially include the Debtor's counsel of
27 record, the United States Trustee, the parties in interest who formally request notice by filing a
28 written request for notice with the Clerk of the Court, and other governmental agencies required
to receive notice of proceedings under the Bankruptcy Rules and Local Bankruptcy Rules.
Therefore, if you are not one of the parties specifically mentioned above, you must file a written
request for notice with the Clerk of the Court, United States Bankruptcy Court, District of
Nevada, 300 Las Vegas Boulevard South, 4th Floor, Las Vegas, NV 89101, if you desire to
receive notice of the proceedings in this bankruptcy case.

PLEASE TAKE FURTHER NOTICE that the Official Service List has been established
in order to protect the assets of the above-referenced bankruptcy estate in this case from
diminution resulting from the copying, postage, and other expenses associated with providing

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1 notice of proceedings to approximately Two Thousand Eight Hundred (2,800) creditors and
2 interested parties in this bankruptcy case. Therefore, unless you intend to be an active participant
3 in this bankruptcy case, it is requested that you not file a written request to be included on the
4 Official Service List.

5 **PLEASE TAKE FURTHER NOTICE** that if you opt not to file a written request to be
6 included on the Official Service List, you can receive notice containing general information
7 regarding the bankruptcy case including scheduled up-coming hearings which is located at
8 <http://nelsonhoumand.com/ameri-dream-realty-llc>. A website has also been established which
9 provides the entire court docket in which you can view the pleadings filed in this bankruptcy case
10 which is located at <http://nelsonhoumand.com/ameri-dream-realty-court-documents>. These
11 websites have been established and are maintained by the Trustee.

12 DATED: February _____, 2015

13 **NELSON & HOUMAND, P.C.**

14 _____
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