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Electronically Filed On: March 2, 2015

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

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,
Debtor.

Case No. BK-S-15-10110-LED
Chapter 7

**NOTICE OF ENTRY OF ORDER GRANTING
TRUSTEE'S APPLICATION TO (1) EMPLOY
NELLIS AUCTION AS AUCTIONEER TO SELL
PERSONAL PROPERTY, PAY COMMISSION,
REIMBURSE EXPENSES AND (2) APPROVE
THE SALE OF PERSONAL PROPERTY FREE
AND CLEAR OF LIENS, CHARGES, INTEREST
AND ENCUMBRANCES PURSUANT TO 11
U.S.C. § 363; AND**

**NOTICE OF ENTRY OF ORDER
AUTHORIZING EMPLOYMENT OF THE
GARDEN CITY GROUP, LLC AS CLAIMS AND
NOTICING AGENT**

Date of Hearing: February 25, 2015
Time of Hearing: 1:30 P.M.
Place: Courtroom No. 3, Third Floor
Foley Federal Bldg
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

PLEASE TAKE NOTICE that an Order Granting Trustee's Application To (1) Employ
Nellis Auction As Auctioneer To Sell Personal Property, Pay Commission, Reimburse Expenses

1 And (2) Approve The Sale Of Personal Property Free And Clear Of Liens, Charges, Interest And
2 Encumbrances Pursuant To 11 U.S.C. § 363 [Docket No. 129] and Notice Of Entry Of Order
3 Authorizing Employment Of The Garden City Group, LLC As Claims And Noticing Agent
4 [Docket No. 128] were entered in the above-captioned case on February 27, 2015.

5 A copy of said Orders are attached.

6 DATED this 2nd day of March, 2015.

7
8 **NELSON & HOUMAND, P.C.**

9 /s/ Jacob L. Houmand

10 Jacob L. Houmand, Esq. (NV Bar No. 12781)
11 3900 Paradise Road; Suite U
12 Las Vegas, Nevada 89169-0903
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Facsimile: 702/720-3371

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

CERTIFICATE OF SERVICE

1. On March 2, 2015, I served the foregoing document(s) (*specify*):

Notice of Entry of Order Granting Trustee's Application To (1) Employ Nellis Auction As Auctioneer To Sell Personal Property, Pay Commission, Reimburse Expenses And (2) Approve The Sale Of Personal Property Free And Clear Of Liens, Charges, Interest And Encumbrances Pursuant To 11 U.S.C. § 363 [Docket No. 129] and Notice Of Entry Of Order Authorizing Employment Of The Garden City Group, LLC As Claims And Noticing Agent [Docket No. 128]

2. I served the above-named document(s) by the following means to the persons as listed below:

(*Check all that apply*)

☒ a. ECF System (*You must attach the "Notice of Electronic Filing", or list persons and addresses and attach additional paper if necessary*)

RICHARD F. HOLLEY on behalf of Creditor HOMEOWNERS GROUP OF 28
rholley@nevadafirm.com,
oatamoh@nevadafirm.com; apestonit@nevadafirm.com; oswibies@nevadafirm.com

JACOB L. HOUMAND on behalf of Trustee VICTORIA NELSON
jhoumand@nelsonhoumand.com,
vnelson@nelsonhoumand.com; cjorvig@nelsonhoumand.com; nalcantara@nelsonhoumand.com

VICTORIA NELSON trustee@nelsonhoumand.com,
cjorvig@nelsonhoumand.com; vlm@trustesolutions.net; nalcantara@nelsonhoumand.com; nv29@ecfbis.com

VICTORIA NELSON on behalf of Trustee VICTORIA NELSON
trustee@nelsonhoumand.com,
cjorvig@nelsonhoumand.com; vlm@trustesolutions.net; nalcantara@nelsonhoumand.com; nv29@ecfbis.com

TARA D. NEWBERRY on behalf of Various Creditors
tnewberry@cnlawlv.com,
anewberry@cnlawlv.com; myecfcnlaw@gmail.com; administration@cnlawlv.com

AMANDA M. PERACH on behalf of Debtor AMERI-DREAM REALTY LLC
aperach@mcdonaldcarano.com, mcarter@mcdonaldcarano.com

DAVID A RIGGI on behalf of Creditor NARA KAZARIAN
darnvbk@gmail.com, riggilaw2@gmail.com

STEVEN B. SCOW on behalf of Creditor ONE STOP REALTY
sscow@kochscow.com

1 U.S. TRUSTEE - LV - 7
2 USTPRegion17.LV.ECF@usdoj.gov

3 RYAN J. WORKS on behalf of Debtor AMERI-DREAM REALTY LLC
4 rworks@mcdonaldcarano.com, kbarrett@mcdonaldcarano.com;bgrubb@mcdonaldcarano.com

5 ☒ b. **United States mail, postage full prepaid**
6 *(List persons and addresses. Attach additional paper if necessary)*

7 Office of United States Trustee
8 300 Las Vegas Boulevard South, Suite 4300
9 Las Vegas, NV 89101

10 **Governmental Agencies**

11 Dept. of Employment, Training & Rehab
12 Employment Security Division
13 500 East Third Street
14 Carson City, NV 89713

15 Internal Revenue Service
16 P.O. Box 7346
17 Philadelphia, PA 19101-7346

18 Nevada Department of Taxation
19 Attn: Bankruptcy Section
20 555 E. Washington Ave., #1300
21 Las Vegas, NV 89101

22 Clark County Assessor
23 c/o Bankruptcy Clerk
24 500 S Grand Central Pkwy
25 Box 551401
26 Las Vegas, NV 89155-1401

27 ☐ c. **Personal Service** *(List persons and addresses. Attach additional paper if necessary)*

28 I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

- ☐ d. **By direct e mail (as opposed to through the ECF System)**
(List persons and email addresses. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

- ☐ e. **By fax transmission (List persons and fax numbers. Attach additional paper if necessary)**

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

- ☐ f. **By messenger (List persons and addresses. Attach additional paper if necessary)**

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. (A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

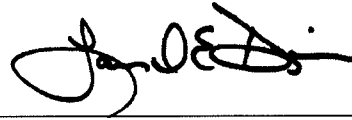
Signed on (date): March 2, 2015

Carol E. Jorvig

NAME OF DECLARANT)

/s/ Carol E. Jorvig

(SIGNATURE OF DECLARANT)



Honorable Laurel E. Davis
United States Bankruptcy Judge



Entered on Docket
February 27, 2015

Jacob L. Houmand, Esq. (NV Bar No. 12781)
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[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

AMERI-DREAM REALTY, LLC

Debtor.

Case No. BK-S-15-10110-LED
Chapter 7

**ORDER GRANTING TRUSTEE'S
APPLICATION TO (1) EMPLOY NELLIS
AUCTION AS AUCTIONEER TO SELL
PERSONAL PROPERTY, PAY
COMMISSION, REIMBURSE EXPENSES
AND (2) APPROVE THE SALE OF
PERSONAL PROPERTY FREE AND
CLEAR OF LIENS, CHARGES,
INTEREST AND ENCUMBRANCES
PURSUANT TO 11 U.S.C. § 363**

Date of Hearing: February 25, 2015
Time of Hearing: 1:30 p.m.
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

This matter came before this Court on the *Trustee's Application to (1) Employ Nellis
Auction As Auctioneer to Sell Personal Property, Pay Commission, Reimburse Expenses and (2)*

1 *Approve the Sale of Personal Property Free and Clear of Liens, Charges, Interest and*
2 *Encumbrances Pursuant to 11 U.S.C. § 363 (the “Application”)* [ECF No. 106]¹, filed on
3 February 17, 2015, filed by Victoria L. Nelson, the Chapter 7 Trustee in the above-captioned
4 bankruptcy case (the “Trustee”), by and through her proposed counsel of record, Jacob L.
5 Houmand, Esq. of the Law Firm of Nelson & Houmand, P.C.² The Application sought authority
6 to employ Nellis Auction as auctioneer to sell the personal property located on the premises
7 leased by Ameri-Dream Realty, LLC (the “Debtor”) located at 4875 Nevso Drive, Las Vegas,
8 Nevada 89103 pursuant to 11 U.S.C. § 363.

9 Jacob L. Houmand, Esq. appeared on behalf of the Trustee. All other appearances were
10 noted on the record.

11 The Court reviewed the Application, the *Declaration of Victoria L. Nelson In Support of*
12 *the Trustee’s Application to (1) Employ Nellis Auction As Auctioneer to Sell Personal Property,*
13 *Pay Commission, Reimburse Expenses and (2) Approve the Sale of Personal Property Free and*
14 *Clear of Liens, Charges, Interest and Encumbrances Pursuant to 11 U.S.C. § 363* [ECF No. 107],
15 the *Declaration of Kenneth Chupinsky In Support of the Trustee’s Application to (1) Employ*
16 *Nellis Auction As Auctioneer to Sell Personal Property, Pay Commission, Reimburse Expenses*
17 *and (2) Approve the Sale of Personal Property Free and Clear of Liens, Charges, Interest and*
18 *Encumbrances Pursuant to 11 U.S.C. § 363* [ECF No. 108], the exhibits attached thereto, and all
19 of the papers on file herein. Based upon this review and the findings of fact and conclusions of
20 law placed on the record at the hearing, and incorporated herein pursuant to Federal Rule of Civil
21 Procedure 52, made applicable to this matter pursuant to Federal Rules of Bankruptcy Procedure
22 9014(c) and 7052, and good cause appearing, it is hereby,

23 **ORDERED** that the Application is **GRANTED** in its entirety; and

24 ...

25 _____
26 ¹ In this Order, all references to “ECF No.” are to the numbers assigned to the documents filed in
27 the case as they appear on the docket maintained by the clerk of the court.

28 ² All defined terms in this Order shall have the same meaning ascribed to them in the Motion
unless otherwise provided herein.

1 **IT IS FURTHER ORDERED** that the Trustee is authorized to employ Nellis Auction to
2 sell all of the Debtor's personal property located at 4875 Nevso Drive, Las Vegas, Nevada 89103
3 free and clear of liens pursuant to 11 U.S.C. § 363.

4 **IT IS SO ORDERED.**

5 Prepared and Submitted By:

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

7
8 /s/ Jacob L. Houmand

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

3900 Paradise Road; Suite U

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12 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*
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RULE 9021 CERTIFICATE

In accordance with Local Rule 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

☐ The Court has waived the requirements set forth in LR 9021(b)(1).

☒ No party appeared at the hearing or filed an objection to the motion.

☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:

☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to Local Rule 9014(g), and that no party has objected to the form or content of the order.

NELSON & HOUMAND, P.C.

/s/ Jacob L. Houmand

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

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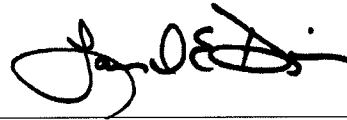
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*[Proposed] Counsel for Victoria L. Nelson,
Chapter 7 Trustee*

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Honorable Laurel E. Davis
United States Bankruptcy Judge



Entered on Docket
February 27, 2015

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

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

Case No. BK-S-15-10110-LED
Chapter 7

**ORDER AUTHORIZING EMPLOYMENT
OF THE GARDEN CITY GROUP, LLC
AS CLAIMS AND NOTICING AGENT**

Date of Hearing: February 25, 2015
Time of Hearing: 1:30 p.m.
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis

This Court having considered the *Application for Order Authorizing the Employment of The Garden City Group, LLC as Claims and Noticing Agent* (the "Application") [ECF No. 88] filed on February 9, 2015, by Victoria L. Nelson, the appointed Chapter 7 Trustee in the above-captioned bankruptcy case (the "Trustee"), and the *Declaration of Angela Ferrante in Support of the Application for Order Authorizing the Employment of The Garden City Group, LLC as Claims*

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1 *and Noticing Agent* (the “Ferrante Declaration”) [ECF No. 89], and with all other findings set
 2 forth in the record at the hearing noted above and incorporated herein, pursuant to Federal Rule of
 3 Bankruptcy Procedure 7052; and it appearing that this Court has jurisdiction to consider the
 4 Application pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core
 5 proceeding pursuant to 28 U.S.C. § 157(b); the Court hereby finds (1) that notice of the
 6 Application was good and sufficient as provided therein and under the circumstances; (2) The
 7 Garden City Group, LLC (“GCG”) (a) does not represent any other entity having an interest
 8 materially adverse to the interests of the Trustee or the bankruptcy estate in connection with this
 9 bankruptcy case; (b) GCG is a “disinterested person” within the meaning of Bankruptcy Code
 10 section 101(14); (c) the employment of GCG as the Trustee’s claims and noticing agent is
 11 necessary and in the best interest of the bankruptcy estate; and (3) good cause exists to approve
 12 the employment of GCG.¹

13 **NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

14 1. The Application is granted in all respects.
 15 2. Pursuant to 28 U.S.C. § 156(c) and Bankruptcy Rule 2002, the Trustee is
 16 authorized to employ and retain GCG as claims and noticing agent, effective as of the
 17 Employment Date, to perform the services set forth in the Application and under the terms of the
 18 retention agreement attached as Exhibit “1” to the Ferrante Declaration (the “Engagement
 19 Agreement”).

20 3. GCG is disinterested as that term is defined in Bankruptcy Code section 101(14)
 21 and as used in Bankruptcy Code section 327(a).

22 4. Pursuant to the Guidelines for A Claims Agent issued by the Bankruptcy Court in
 23 this District (the “Guidelines”),² GCG shall relieve the Clerk’s office of all noticing under any
 24 applicable Bankruptcy Rules and processing of claims.

25 _____
 26 ¹ Unless other provided herein, all defined terms shall have the same meaning ascribed to them in
 27 the Application.

28 ² The Guidelines are available at: <http://www/nvb.uscourts.gov/downloads/cm-ecf/guidelines-claims-agent.pdf>.

1 5. Without further order of the Court, the Trustee is authorized to compensate GCG
2 on a monthly basis in accordance with the terms and conditions of the Engagement Agreement,
3 upon GCG's submission to the Trustee of monthly invoices summarizing in reasonable detail the
4 services rendered and expenses incurred in connection therewith.

5 6. The terms of this Order shall be immediately effective and enforceable upon its
6 entry.

7 7. The Court retains jurisdiction with respect to all matters arising from or related to
8 the implementation of this Order.

9 **IT IS SO ORDERED.**

10 Prepared and Submitted By:

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

12
13 /s/ Jacob L. Houmand

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

15 3900 Paradise Road; Suite U

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19 *[Proposed] Counsel for Victoria L. Nelson, Chapter 7 Trustee*
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RULE 9021 CERTIFICATE

In accordance with Local Rule 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

☐ The Court has waived the requirements set forth in LR 9021(b)(1).

☒ No party appeared at the hearing or filed an objection to the motion.

☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below:

☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to Local Rule 9014(g), and that no party has objected to the form or content of the order.

NELSON & HOUMAND, P.C.

/s/ Jacob L. Houmand

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

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