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

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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-LED
Chapter 7

**STIPULATION FOR REJECTION OF A
LEASE OF NON-RESIDENTIAL REAL
PROPERTY**

Judge: Honorable Laurel E. Davis

NELSON & HOUMAND, P.C.
3900 Paradise Road, Suite U
Las Vegas, Nevada 89169
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17 Victoria L. Nelson, the Chapter 7 Trustee appointed in the above-captioned bankruptcy
18 matter (the "Trustee"), by and through her proposed counsel, Jacob L. Houmand, Esq. of the law
19 firm of Nelson & Houmand, P.C., and Epic Investment, Inc. (the "Landlord"), the Landlord to
20 Ameri-Dream Realty, LLC (the "Debtor"), (the Trustee and the Landlord shall be collectively
21 referred to as the "Parties"), hereby stipulate and agree as follows:

22 **RECITALS**

- 23 1. On November 25, 2010, the Debtor entered into a lease for a period of six (6) years
24 commencing on January 1, 2011, for the premises located at 4875 West Nevso Drive, Las Vegas,
25 Nevada (the "Lease").
- 26 2. The monthly payments on the Lease were Four Thousand Eight Hundred Sixty-
27 One Dollars (\$4,861.00).
- 28 3. At the time the Lease was entered into, the Debtor paid to Landlord Advance Rent

1 in the amount of Nine Thousand Seven Hundred Twenty-Two Dollars (\$9,722) and a Security
2 Deposit in the amount of Six Thousand Six Hundred Eighty-Three Dollars and Eighty-Seven
3 Cents (\$6,683.87).

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]¹.

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

8 6. Since her appointment, the Trustee has been administering the Debtor’s
9 bankruptcy estate including obtaining Court authorization to employ an auctioneer to sell the
10 Debtor’s personal property located at 4875 West Nevso Drive, Las Vegas, Nevada (the “Personal
11 Property”).

12 7. An online auction to sell the Personal Property is scheduled to be concluded on
13 March 13, 2015, and all unsold Personal Property will be removed from the premises of 4875
14 West Nevso Drive, Las Vegas, Nevada, by March 16, 2015.

15 8. The Trustee and the Landlord have agreed that the Lease shall be terminated when
16 the remaining unsold Personal Property is removed from the premises which shall occur no later
17 than March 17, 2015.

18 9. Although the Landlord is prohibited from removing the Personal Property, the
19 Landlord or its duly authorized agent shall have access to the premises and is permitted to enter
20 the premises prior to termination of the Lease to show the property to prospective tenants.

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

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STIPULATION

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IT IS HEREBY STIPULATED AND AGREED that the Lease shall be terminated when the remaining unsold Personal Property is removed from the premises which shall occur no later than March 17, 2015.


IT IS FURTHER HEREBY STIPULATED AND AGREED that although the Landlord is prohibited from removing the Personal Property, the Landlord or its duly authorized agent shall have access to the premises and is permitted to enter the premises prior to termination of the Lease to show the property to prospective tenants.

Dated this ____ day of March, 2015

Dated this 3rd day of March, 2015

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

 Grace Jinn
a duly authorized representative of
Epic Investment, Inc.