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Electronically Filed On: April 22, 2015

5 *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

**SUPPLEMENTAL DECLARATION OF
SAMUEL A. SCHWARTZ, ESQ. IN
SUPPORT OF APPLICATION TO
EMPLOY SCHWARTZ FLANSBURG,
PLLC AS SPECIAL BANKRUPTCY
COUNSEL FOR VICTORIA L. NELSON,
CHAPTER 7 TRUSTEE PURSUANT TO
11 U.S.C. §§ 327(a) AND 328(a) AND
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2014**

Date of Hearing: May 5, 2015
Time of Hearing: 2:30 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

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23 I, Samuel A. Schwartz, Esq., hereby declare as follows:

24 1. I am over the age of 18 and mentally competent. Except where stated on
25 information and belief, I have personal knowledge of the facts in this matter and if called upon to
26 testify, could and would do so. I make this supplemental declaration in support of the *Application*
27 *to Employ Schwartz Flansburg, PLLC as Special Bankruptcy Counsel for Victoria L. Nelson,*
28 *Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy*

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1 *Procedure 2014* [ECF No. 150] (the “Application”).¹

2 2. I am an attorney licensed to practice law in the State of Nevada and admitted to
3 practice before this Court. I am a managing member with the law firm of Schwartz Flansburg,
4 PLLC (the “Firm”). The Firm maintains offices at 6623 Las Vegas Boulevard South, Suite 300,
5 Las Vegas, Nevada 89119.

6 3. This Supplemental Declaration is made pursuant to 11 U.S.C. § 329 and Federal
7 Rule of Bankruptcy Procedure 2014(b) and is in support of the Application.

8 4. On April 1, 2015, I executed the *Declaration of Samuel A. Schwartz, Esq. In*
9 *Support of Application to Employ Schwartz Flansburg, PLLC As Special Bankruptcy Counsel for*
10 *Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal*
11 *Rule of Bankruptcy Procedure 2014* [ECF No. 152] (the “Schwartz Declaration”).

12 5. Following the filing of the Schwartz Declaration, I discovered an additional
13 connection between the Firm and the Debtor.

14 6. In addition to the connections disclosed in the Schwartz Declaration, a relative of
15 an Associate Attorney at the Firm was a tenant whose property was previously managed by the
16 Debtor.

17 7. The Firm did not represent any of the tenants of the real properties previously
18 managed by the Debtor.

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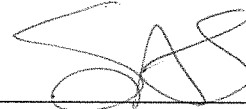
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26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise stated herein, all
undefined, capitalized terms shall have the meaning ascribed to them in the Application.

1 8. Except as set forth in herein and in the Schwartz Declaration, to the best of my
2 information and belief, neither the Firm nor any of its attorneys has any connection with the
3 Debtor, the creditors, any other parties in interest, their respective attorneys and accountants, the
4 Office of the United States Trustee, or any person employed in the Office of the United States
5 Trustee and that the Firm and each of its attorneys are all disinterested persons pursuant to 11
6 U.S.C. § 101(14).

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

9 Dated this 22nd day of April, 2015.



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11 _____
Samuel A. Schwartz, Esq.

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