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Electronically Filed On: November 11, 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

DECLARATION OF JACOB L. HOUMAND, ESQ. IN SUPPORT OF SECOND INTERIM APPLICATION OF NELSON & HOUMAND, P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED DURING THE PERIOD FROM JUNE 3, 2015, THROUGH NOVEMBER 11, 2015 AND FOR REIMBURSEMENT OF EXPENSES PURSUANT TO 11 U.S.C. §§ 330 AND 331 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016

Date of Hearing: December 15, 2015
Time of Hearing: 11:00 a.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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25 I, Jacob L. Houmand, declare as follows:

26 1. I am over the age of 18 years and I am competent to make this declaration. I have
27 personal knowledge of the facts set forth herein, except for those facts stated on information and
28 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I

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1 could and would testify as to the matters set forth below based upon my personal knowledge.

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 shareholder with the law firm of Nelson & Houmand, P.C. (the
4 “Firm”). The Firm maintains offices at 3900 Paradise Road, Suite U, Las Vegas, Nevada 89169-
5 0903.

6 3. I make this declaration in support of the Second Interim Application of Nelson &
7 Houmand, P.C. for Allowance of Compensation for Services Rendered During the Period From
8 June 3, 2015, Through November 11, 2015 and For Reimbursement of Expenses Pursuant to 11
9 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016 (the “Fee Application”).¹

10 4. The Fee Application concerns attorneys’ fees and expenses that were incurred in
11 connection with the above-captioned bankruptcy case during the period from June 3, 2015,
12 through November 11, 2015 (the “Fee Application Period”).

13 5. The Fee Application requests an order (i) approving and allowing on an interim
14 basis compensation in the amount of \$58,710 for the reasonable and necessary services of the
15 Firm during the Fee Application Period, (ii) approving and allowing on an interim basis
16 reimbursement of expenses in the amount of \$1,937.08 that were incurred during the Fee
17 Application Period, and (iii) authorizing the Trustee to pay such amounts to the Firm.

18 6. The services that the Firm rendered to the Trustee during the Fee Application
19 Period benefited the Debtor’s estate and that, therefore, the attorneys’ fees and expenses requested
20 in the Fee Application should be approved under Section 330(a).

21 7. I certify that (a) I have read the Fee Application; (b) to the best of my knowledge,
22 information and belief, formed after reasonable inquiry, the compensation and expense
23 reimbursement sought is in conformity with the Guidelines for Compensation and Expense

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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, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
27 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
28 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”. In
addition, all defined terms herein shall have the same meaning ascribed to them in the Fee
Application unless otherwise provided.

1 Reimbursement of Professionals and Trustees for the United States Bankruptcy Court, District of
2 Nevada (the “Guidelines”) except as specifically noted in the Fee Application; and (c) the
3 compensation and expense reimbursement requested are billed at rates, in accordance with
4 practices, no less favorable than those customarily employed by the Firm and generally accepted
5 by the clients of the Firm.

6 8. True and correct copies of the billing entries for the work performed by the Firm in
7 connection with the above-captioned bankruptcy case are attached hereto as **Exhibit “1”**.

8 9. I have reviewed the billing entries attached hereto as **Exhibit “1”** and the
9 narratives in the Fee Application describing the work performed by the Firm and believe that such
10 time sheets and narratives are true and correct in all material respects.

11 10. True and correct copies of the itemization of expenses for actual costs incurred by
12 the Firm in connection with the above-captioned bankruptcy case during the Fee Application
13 Period are attached hereto as **Exhibit “2”**.

14 11. I have reviewed the itemization of expenses attached hereto as **Exhibit “2”** and
15 believe that such reports are true and correct in all material respects.

16 12. Except for the Fee Application, the Firm has filed no previous requests for
17 compensation and has not received any payment on account of its services from the Trustee prior
18 to the date hereof.

19 13. The Firm has not been paid or received any compensation from any source for
20 services rendered in connection with this case. There are no agreements or understandings for the
21 Firm to receive fees from any source other than the bankruptcy estate.

22 14. No agreement or understanding exists between the Firm and any other entity for
23 the sharing of compensation received or to be received for services rendered in connection with
24 this case, except as permitted under Section 504(b)(1).


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1 15. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines I
2 sent a copy of the Fee Application, the billing entries that are attached hereto as **Exhibit "1"**, and
3 the itemization of expenses attached hereto as **Exhibit "2"** to the Trustee and she has approved
4 the amounts requested in the Fee Application.

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

7 Dated this 11th day of November, 2015.

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11 Jacob L. Houmand, Esq.

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