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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

**NOTICE OF HEARING ON THIRD
INTERIM APPLICATION OF NELSON &
HOUMAND, P.C. FOR ALLOWANCE OF
COMPENSATION FOR SERVICES
RENDERED DURING THE PERIOD
FROM NOVEMBER 12, 2015, THROUGH
DECEMBER 1, 2016 AND FOR
REIMBURSEMENT OF EXPENSES
PURSUANT TO 11 U.S.C. §§ 330 AND 331
AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2016**

Date of Hearing: January 3, 2017
Time of Hearing: 10:30 a.m.
Place: Courtroom No. 3, Third Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Laurel E. Davis¹

23 **NOTICE IS HEREBY GIVEN** that the *Third Interim Application of Nelson &*
24 *Houmand, P.C. for Allowance of Compensation for Services Rendered During the Period From*

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 *November 12, 2015, Through December 1, 2016, and For Reimbursement of Expenses Pursuant*
2 *to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* was filed by Jacob
3 L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of NELSON & HOUMAND, P.C. (the
4 “Firm”), counsel of record for VICTORIA L. NELSON, the Chapter 7 Trustee in the above-
5 captioned bankruptcy case (the “Fee Application”).

6 The Fee Application requests that the Court approve attorneys’ fees in the amount of
7 \$71,307.50 and reimbursement of actual expenses in the amount of \$1,145.90 on an interim basis
8 that were incurred by the Firm during the period from November 12, 2015, through December 1,
9 2016. The statutory basis for the approval of the attorneys’ fees and reimbursement of expenses
10 sought in the Fee Application are Sections 330 and 331 and FRBP 2016. The Fee Application is
11 the Firm’s third request for interim compensation. Specifically, on July 8, 2015, the Court entered
12 an *Order Granting First Interim Application of Nelson & Houmand, P.C. for Allowance of*
13 *Compensation for Services Rendered During the Period From January 13, 2015, Through June 2,*
14 *2015, and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal*
15 *Rule of Bankruptcy Procedure 2016* [ECF No. 178] (the “First Interim Fees Order”). Pursuant to
16 the First Interim Fee Order, the Firm was awarded \$55,800.00 in fees and \$1,986.88 in expenses.
17 On December 16, 2015, the Court entered an *Order Granting Second Interim Application of*
18 *Nelson & Houmand, P.C. for Allowance of Compensation for Services Rendered During the*
19 *Period From June 3, 2015, Through November 11, 2015, and For Reimbursement of Expenses*
20 *Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* [ECF No.
21 206] (the “Second Interim Fees Order”). Pursuant to the Second Interim Fee Order, the Firm was
22 awarded \$58,710.00 in fees and \$1,937.08 in expenses. The balance of the trust account in the
23 Debtor’s bankruptcy case is Seven Hundred Nine Thousand Five Hundred Four and 52/100
24 Dollars (\$709,504.52).

25 The Trustee is a member of the Firm and regularly employs the Firm to represent
26 bankruptcy estates in other unrelated bankruptcy cases in which she is the Trustee. The Trustee
27 did not personally bill any legal fees in the Bankruptcy Case.

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1 A copy of the Fee Application, the *Declaration of Jacob L. Houmand, Esq. In Support of*
2 *Third Interim Application of Nelson & Houmand, P.C. for Allowance of Compensation for*
3 *Services Rendered During the Period From November 12, 2015, Through December 1, 2016, and*
4 *For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
5 *Bankruptcy Procedure 2016, and the Declaration of Victoria L. Nelson In Support of Third*
6 *Interim Application of Nelson & Houmand, P.C. for Allowance of Compensation for Services*
7 *Rendered During the Period From November 12, 2015, Through December 1, 2016, and For*
8 *Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
9 *Bankruptcy Procedure 2016* are on file with the Clerk’s Office of the United States Bankruptcy
10 Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Fee
11 Application and any supporting declarations may also be obtained from counsel for the Trustee or
12 through the Bankruptcy Court’s website at www.nvb.uscourts.gov.

13 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
14 sought in the Fee Application, or if you want the Court to consider your reviews on the Fee
15 Application, then you must file an opposition with the Court, and serve a copy of the person
16 making the Fee Application ***no later than fourteen (14) days before the hearing date.*** The
17 opposition must state your position, set forth all relevant facts and legal authority, and be
18 supported by affidavits or declarations that conform to Local Rule 9014(c).

19 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
20 with the court. You *must* also serve your written response on the person who sent you this
21 notice.
22 If you do not file a written response with the court, or if you do not serve your written
23 response on the person who sent you this notice, then:
24

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

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27 ...
28 ...

1 **NOTICE IS FURTHER GIVEN** that the hearing on said Fee Application will be held before a
2 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Third
3 Floor, Courtroom No. 3, Las Vegas, Nevada on January 3, 2017 at 10:30 a.m.

4 **NOTICE IS FURTHER GIVEN** that this hearing may be continued from time to time
5 without further notice except for the announcement of any adjourned dates and times at the
6 above-noted hearing or any adjournment thereof.

7 Dated this 2nd day of December, 2016.

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

9 /s/ Kyle J. Ortiz

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17 *Trustee*

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