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

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-GS
Chapter 7

**STIPULATION RESOLVING
OBJECTIONS TO PROOFS OF CLAIM
NUMBERS 910, 912, AND 913 FILED BY
MICHAEL M. CHEUNG**

Judge: Honorable Gary Spraker

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16 VICTORIA L. NELSON, the duly appointed Chapter 7 Trustee in the above-captioned
17 bankruptcy case (the "Trustee"), by and through her counsel of record, Jacob L. Houmand, Esq.
18 and Kyle J. Ortiz, Esq., of the law firm of Nelson & Houmand, P.C., and MICHAEL M.
19 CHEUNG (the "Claimant"), by and through his counsel of record, Tara D. Newberry, Esq. (the
20 Trustee and the Claimant shall be collectively referred to herein as the "Parties"), hereby stipulate
21 and agree as follows:

22 **I. RECITALS**

23 1. On January 9, 2015 (the "Petition Date"), Ameri-Dream Realty, LLC (the
24 "Debtor") filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code [ECF
25 No. 1]¹.

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28 ¹ All references to "ECF No." are to the numbers assigned to the documents filed in the case as they appear on the docket maintained by the clerk of the court.

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2. On January 9, 2015, the Trustee was appointed as the Chapter 7 Trustee in the Bankruptcy Case.

3. Since the Debtor’s bankruptcy case was deemed a mega case, the Trustee sought and obtained court approval to employ Garden City Group, LLC (“GCG”) as the claims and noticing agent.

4. The deadline to timely file proofs of claim was May 14, 2015. Upon the expiration of the deadline to file proofs of claims, GCG filed the proofs of claims with the Court.

5. Claimant timely filed proofs of claim in the following amounts:

- (a) Claim 910: \$12,405.00 claiming \$12,405.00 in priority under 11 U.S.C. § 507(a)(4)
- (b) Claim 912: \$16,477.60 claiming \$12,475.00 in priority under 11 U.S.C. § 507(a)(4)
- (c) Claim 913: \$5,007.99 claiming \$5,007.99 in an unspecified level of priority under 11 U.S.C. § 507(a)

(collectively, the “Proofs of Claim”)

6. The Trustee has reviewed the Proofs of Claim and raised informal objections as the Proofs of Claim seek a priority in the amount of \$24,880.00, which exceeds the maximum amount allowed under 11 U.S.C. § 507(a)(4) of \$12,475.00.

7. The Trustee has also raised an informal objection as Claim 913 claims an unspecified level of priority under 11 U.S.C. § 507(a).

8. The Trustee has discussed the informal objections with Claimant’s counsel.

9. The Parties have conferred and agree to resolve the Trustee’s informal objections to the Proofs of Claim upon the terms and conditions set forth below.

WHEREFORE, in consideration of the foregoing and subject to the approval of this Court, the Trustee and Claimant hereby stipulate and agree as follows:

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II. STIPULATION

1. **Amendment of Proof of Claim 910.** Upon Court approval of this Stipulation, Proof of Claim 910 shall be allowed as a general unsecured claim in the amount of \$12,405.00.

2. **Allowance of Proof of Claim 912.** Upon Court approval of this Stipulation, Proof of Claim 912 shall be allowed.

3. **Amendment of Proof of Claim 913.** Upon Court approval of this Stipulation, Proof of Claim 913 shall be allowed as a general unsecured claim in the amount of \$5,007.99.

IT IS SO STIPULATED.

Dated this 23rd day of May, 2017.

Dated this 23rd day of May, 2017.

By: /s/ Kyle J. Ortiz
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