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Electronically Filed On: July 31, 2018

6 *Counsel for Shelley D. Krohn, 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

DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF TRUSTEE'S OBJECTION TO PROOF OF CLAIM NUMBER 780-1 FILED BY MEI-PENH KHUU PURSUANT TO 11 U.S.C. § 502(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007

Date of Hearing: August 30, 2018
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker ¹

21
22 I, Shelley D. Krohn, declare as follows:

23 1. I am over the age of 18 years and I am competent to make this declaration. I have
24 personal knowledge of the facts set forth herein, except for those facts stated on information and
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 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I
2 could and would testify as to the matters set forth below based upon my personal knowledge.

3 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

4 3. I make this declaration to support the *Trustee’s Objection to Proof of Claim*
5 *Number 780-1 Filed by Mei-Penh Khuu Pursuant to 11 U.S.C. § 502(b)(1) and Federal Rule of*
6 *Bankruptcy Procedure 3007* (the “Objection”).²

7 4. On January 9, 2015 (the “Petition Date”), the Debtor filed a voluntary bankruptcy
8 pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]³.

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

11 6. On January 28, 2015, the Court entered an *Amended Notice of Chapter 7*
12 *Bankruptcy Case* [ECF No. 12] that established May 14, 2015, as the deadline for creditors to file
13 proofs of claim.

14 7. On February 9, 2015, Trustee Nelson filed an *Application for Order Authorizing*
15 *Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 88].

16 8. On February 27, 2015, the Court entered an *Order Granting Application for Order*
17 *Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No.
18 128].

19 9. Since its employment, GCG has been maintaining the Proofs of Claim that have
20 been submitted by creditors.

21 10. On January 13, 2018, Trustee Nelson died.

22 11. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the
23 Debtor’s bankruptcy case.

24 ...

25 _____
26 ² Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to
27 them in the Objection.

28 ³ 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.

