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*Counsel for Shelley D. Krohn, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:  
  
AMERI-DREAM REALTY, LLC,  
  
Debtor.

Case No. BK-S-15-10110-GS  
Chapter 7

**DECLARATION OF SHELLEY D.  
KROHN IN SUPPORT OF EX PARTE  
MOTION TO PERMIT THE JOINDER  
OF OBJECTIONS TO PROOFS OF  
CLAIM PURSUANT TO FEDERAL  
RULE OF BANKRUPTCY PROCEDURE  
3007(c)**

Date of Hearing: N/A  
Time of Hearing: N/A

Judge: Honorable Gary Spraker<sup>1</sup>

I, Shelley D. Krohn, declare as follows:

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

...

<sup>1</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The 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           2.       I am the successor Chapter 7 Trustee appointed in the above-captioned bankruptcy  
2 case.

3           3.       I make this declaration to support the *Ex Parte Motion to Permit the Joinder of*  
4 *Objections to Proofs of Claim* (the "Motion").<sup>2</sup>

5           4.       On January 9, 2015 (the "Petition Date"), Ameri-Dream Realty, LLC (the  
6 "Debtor") filed a voluntary bankruptcy pursuant to Chapter 7 of Title 11 of the United States  
7 Code [ECF No. 1].<sup>3</sup>

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

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

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

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

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

20          10.       GCG has also filed each of the proofs of claim in its possession with this Court.

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

22          ...

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24 <sup>2</sup> Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11  
25 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The  
26 Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of  
27 Bankruptcy Procedure will be referred to as "FRBP." Unless otherwise expressly stated herein,  
all undefined, capitalized terms shall have the meaning ascribed to them in the Motion.

28 <sup>3</sup> 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.

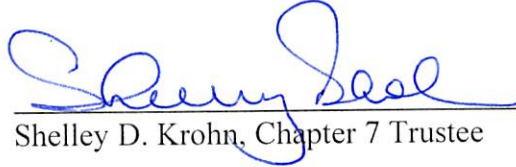
1 12. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the  
2 Debtor's bankruptcy case.

3 13. Allowing me to join objections in a single pleading will greatly reduce the  
4 administrative expenses in the Debtor's bankruptcy case by eliminating the need to separately  
5 prepare pleadings for multiple proofs of claim when the legal analysis would be identical.

6 14. I do not believe any claimants that are the subject of an objection would be  
7 prejudiced because I would comply with the requirements set forth under FRBP 3007(e).

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

10 Dated this 6<sup>th</sup> day of February, 2020.

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14 Shelley D. Krohn, Chapter 7 Trustee

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