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Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
Bradley G. Sims, Esq. (NV Bar No. 11713)
Email: bsims@houmandlaw.com
HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240
Las Vegas, NV 89148
Telephone: 702/720-3370
Facsimile: 702/720-3371

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-LED
Chapter 7

**DECLARATION OF PAUL M. HEALEY,
CPA IN SUPPORT OF SECOND
INTERIM APPLICATION OF PAUL M.
HEALEY & SONS CPAS, LTD. FOR
ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED DURING
THE PERIOD FROM FEBRUARY 21,
2017 THROUGH FEBRUARY 20, 2019
AND FOR REIMBURSEMENT OF
EXPENSES PURSUANT TO 11 U.S.C. §§
330 AND 331 AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2016**

Date of Hearing: May 22, 2020
Time of Hearing: 9:30 a.m.
Place: To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

I, Paul M. Healey, CPA, hereby declare as follows:

1. I am over the age of 18 and mentally competent. Except where stated on information and belief, I have personal knowledge of the facts in this matter and if called upon to testify, could and would do so.

2. I am a certified public accountant and the principal of Paul M. Healey & Sons CPAs, Ltd. (the "Firm").

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1 3. I make this declaration to support the *Second Interim Application of Paul M.*
2 *Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During the*
3 *Period From February 21, 2017 Through February 20, 2019 and For Reimbursement of*
4 *Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016*
5 *(the “Fee Application”).*¹

6 4. The Fee Application concerns fees and expenses that were incurred in connection
7 with the above-captioned bankruptcy case during the period from February 21, 2017, through
8 February 20, 2019 (the “Fee Application Period”).

9 5. The Fee Application requests an order (i) approving and allowing on an interim
10 basis compensation in the amount of \$3,000.00 for the reasonable and necessary services of the
11 Firm during the Fee Application Period, (ii) approving and allowing on an interim basis
12 reimbursement of expenses in the amount of \$0.00 that were incurred during the Fee Application
13 Period, and (iii) authorizing the Trustee to pay such amounts to the Firm.

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

17 7. I certify that (a) I have read the Fee Application; (b) to the best of my knowledge,
18 information and belief, formed after reasonable inquiry, the compensation and expense
19 reimbursement sought is in conformity with the Guidelines for Compensation and Expense
20 Reimbursement of Professionals and Trustees for the United States Bankruptcy Court, District of
21 Nevada (the “Guidelines”) except as specifically noted in the Fee Application; and (c) the
22 compensation and expense reimbursement requested are billed at rates, in accordance with
23

24 _____
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”.
Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to them
in the Fee Application.

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1 practices, no less favorable than those customarily employed by the Firm and generally accepted
2 by the clients of the Firm.

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

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

8 10. The Firm was previously awarded fees in the amount of \$1,025.00 and
9 reimbursement of actual expenses in the amount of \$605.09 pursuant to the *Order Granting First*
10 *Interim Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for*
11 *Services Rendered During the Period From February 13, 2015 Through February 20, 2017 and*
12 *For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
13 *Bankruptcy Procedure 2016* (the “First Fee Application”).

14 11. Except for those fees awarded in connection with the First Fee Application, the
15 Firm has filed no previous requests for compensation and has not received any payment on
16 account of its services from the Trustee prior to the date hereof.

17 12. The Firm has not been paid or received any compensation from any source for the
18 services described in the Fee Application. There are no agreements or understandings for the
19 Firm to receive fees from any source other than the bankruptcy estate.

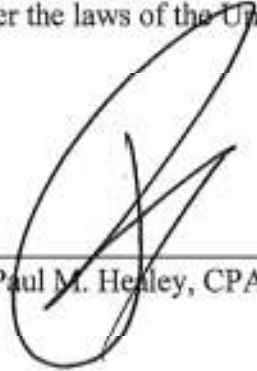
20 13. No agreement or understanding exists between the Firm and any other entity for
21 the sharing of compensation received or to be received for services rendered in connection with
22 this case, except as permitted under Section 504(b)(1).

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1 14. 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 itemization of expenses that are attached
3 hereto as **Exhibit "1"** to the Trustee and she has approved the amounts requested in the Fee
4 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 ___ day of April, 2020.

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11 Paul M. Healey, CPA
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