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Electronically Filed On: April 20, 2020

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

**NOTICE OF HEARING ON TRUSTEE'S
FIRST OMNIBUS OBJECTION TO
PROOFS OF CLAIM PURSUANT TO 11
U.S.C. § 502(b)(1) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 33-1, 52-2, 53-1, 62-1,
71-2, 76-1, 79-1, 95-1, 135-1, 148-1, 150-2,
151-2, 206-1, 218-1, 345-1, 494-1, 505-1, 506-
1, 509-1, 550-1, 551-1, 552-1, 553-1, 554-1,
559-1, 611-1, 652-1, 661-1, 668-1, 830-1, 842-
1, 844-1, 845-1, 853-1, 858-1, 907-1, AND
917-1 BASED ON IMPROPER
ASSERTION OF A PRIORITY CLAIM
FOR UNPAID REAL ESTATE
COMMISSIONS**

Date of Hearing: May 22, 2020
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

26 **NOTICE IS HEREBY GIVEN** that the *Trustee's First Omnibus Objection To Proofs Of*
27 *Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—*
28 *Claim Numbers 33-1, 52-2, 53-1, 62-1, 71-2, 76-1, 79-1, 95-1, 135-1, 148-1, 150-2, 151-2, 206-1,*

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218-1, 345-1, 494-1, 505-1, 506-1, 509-1, 550-1, 551-1, 552-1, 553-1, 554-1, 559-1, 611-1, 652-1, 661-1, 668-1, 830-1, 842-1, 844-1, 845-1, 853-1, 858-1, 907-1, And 917-1 Based On Improper Assertion Of A Priority Claim For Unpaid Real Estate Commissions (the “Objection”) was filed by Shelley D. Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd.¹

The Objection seeks to disallow the priority asserted by the following claims pursuant to Section 507(a)(4) and reclassify them as general unsecured claims:

Claimant	Proof of Claim No.	Grounds for objection ²
Atwood, Adrienne	559-1	Claim improperly asserts a priority claim for unpaid wages/commission pursuant to Section 507(a)(4). See p. 14-16.
Brown, Mark	76-1	Claim improperly asserts a priority claim for unpaid wages/commission pursuant to Section 507(a)(4). See p. 14-16.
Chan, Ivy	554-1	Claim improperly asserts a priority claim for unpaid wages/commission pursuant to Section 507(a)(4). See p. 14-16.
Chang, Kevin	830-1	Claim improperly asserts a priority claim for unpaid wages/commission pursuant to Section 507(a)(4). See p. 14-16.
Chang, Kevin	842-1	Claim improperly asserts a priority claim for

¹ 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”.

² Unless otherwise stated, page references are to the page within the Objection stating the legal argument for the objection.

1			unpaid wages/commission pursuant to Section
2			507(a)(4). <i>See</i> p. 14-16.
3	Chen, Feng (Grace	844-1	Claim improperly asserts a priority claim for
4	Chen, LLC)		unpaid wages/commission pursuant to Section
5			507(a)(4). <i>See</i> p. 14-16.
6	Chen, Hsiu Hui	218-1	Claim improperly asserts a priority claim for
7			unpaid wages/commission pursuant to Section
8			507(a)(4). <i>See</i> p. 14-16.
9	Chen, Rong (AKA	845-1	Claim improperly asserts a priority claim for
10	Kathy Chen)		unpaid wages/commission pursuant to Section
11			507(a)(4). <i>See</i> p. 14-16.
12	Chung, Joan	853-1	Claim improperly asserts a priority claim for
13			unpaid wages/commission pursuant to Section
14			507(a)(4). <i>See</i> p. 14-16.
15	Chung, Joan	858-1	Claim improperly asserts a priority claim for
16			unpaid wages/commission pursuant to Section
17			507(a)(4). <i>See</i> p. 14-16.
18	Cin, Zion	150-2	Claim improperly asserts a priority claim for
19			unpaid wages/commission pursuant to Section
20			507(a)(4). <i>See</i> p. 14-16.
21	Cin, Zion	151-2	Claim improperly asserts a priority claim for
22			unpaid wages/commission pursuant to Section
23			507(a)(4). <i>See</i> p. 14-16.
24	Cinquegrani, Branden	62-1	Claim improperly asserts a priority claim for
25	C.		unpaid wages/commission pursuant to Section
26			507(a)(4). <i>See</i> p. 14-16.
27	Clapp, Lerma	505-1	Claim improperly asserts a secured claim and a
28			

1			priority claim for unpaid wages/commission
2			pursuant to Section 507(a)(4). <i>See</i> p. 14-16.
3	Cruz, Edgardo	509-1	Unpaid Real Estate Commission. Creditor is
4			claiming a priority based upon the fact that the
5			transaction closed after the bankruptcy case was
6			filed. <i>See</i> p. 14-16.
7	Cruz, Edgardo	611-1	Unpaid Real Estate Commission. Claimant is
8			scheduling a priority based upon the section
9			titled “other”, but he does not state a reason for
10			the priority. <i>See</i> p. 14-16.
11	Fang, Jeff Z.	52-2	Claim improperly asserts a priority claim for
12			unpaid wages/commission pursuant to Section
13			507(a)(4). <i>See</i> p. 14-16.
14	Fang, Jeff Z.	53-1	Claim improperly asserts a priority claim for
15			unpaid wages/commission pursuant to Section
16			507(a)(4). <i>See</i> p. 14-16.
17	Flores, Sandra	551-1	Claim improperly asserts a priority claim for
18			unpaid wages/commission pursuant to Section
19			507(a)(4). <i>See</i> p. 14-16.
20	Flores, Sandra	552-1	Claim improperly asserts a priority claim for
21			unpaid wages/commission pursuant to Section
22			507(a)(4). <i>See</i> p. 14-16.
23	Flores, Sandra	553-1	Claim improperly asserts a priority claim for
24			unpaid wages/commission pursuant to Section
25			507(a)(4). <i>See</i> p. 14-16.
26	Kallfelz, Lance	907-1	Claim improperly asserts a priority claim for
27			unpaid wages/commission pursuant to Section
28			

1			507(a)(4). <i>See</i> p. 14-16.
2	Kordick, Thomas	95-1	Claim improperly asserts a priority claim for
3			unpaid wages/commission pursuant to Section
4			507(a)(4). <i>See</i> p. 14-16.
5	Lam, Chi Kin (Freddie)	71-2	Claim improperly asserts a secured claim and a
6			priority claim for unpaid wages/commission
7			pursuant to Section 507(a)(4). <i>See</i> p. 14-16.
8	Lay, Elly	494-1	Claim improperly asserts a priority claim for
9			unpaid wages/commission pursuant to Section
10			507(a)(4). <i>See</i> p. 14-16.
11	Li, Lan	135-1	Claim improperly asserts a priority claim for
12			unpaid wages/commission pursuant to Section
13			507(a)(4). <i>See</i> p. 14-16.
14	Loh, Georgiana	206-1	Claim improperly asserts a priority claim for
15			unpaid wages/commission pursuant to Section
16			507(a)(4). <i>See</i> p. 14-16.
17	Malasarte, Elvie	661-1	Unpaid Real Estate Commissions. Claimant is
18			claiming a priority based upon the fact that the
19			transaction closed after the bankruptcy case was
20			filed. <i>See</i> p. 14-16.
21	Ochoa, Felipe	148-1	Unpaid Real Estate Commissions. Creditor is
22			claiming a priority under Section 507. Creditor
23			has listed the priority under other, stating
24			“contract signed after bankruptcy was filed.”
25			<i>See</i> p. 14-16.
26	Palaez, M. Esperanza	917-1	Claim improperly asserts a priority claim for
27			unpaid wages/commission pursuant to Section
28			

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1			507(a)(4). <i>See</i> p. 14-16.
2	Poon, Phillip	79-1	Claim improperly asserts a priority claim for
3			unpaid wages/commission pursuant to Section
4			507(a)(4). <i>See</i> p. 14-16.
5	Real Estate by Design,	33-1	Claim improperly asserts a priority claim for
6	LLC.		unpaid wages/commission pursuant to Section
7			507(a)(4). <i>See</i> p. 14-16.
8	Whisenhunt, Maria	652-1	Claim improperly asserts a priority claim for
9	Theresa		unpaid wages/commission pursuant to Section
10			507(a)(4). <i>See</i> p. 14-16.
11	Xie, Beth	550-1	Claim improperly asserts a priority claim for
12			unpaid wages/commission pursuant to Section
13			507(a)(4). <i>See</i> p. 14-16.
14	Yao, Yung-Gi	668-1	Claim improperly asserts a priority claim for
15			unpaid wages/commission pursuant to Section
16			507(a)(4). <i>See</i> p. 14-16.
17	Zhang, Esperanza Zhiyi	345-1	Unpaid Real Estate Commission. Creditor is
18			claiming a priority, but does not specify the
19			sub-section. <i>See</i> p. 14-16.
20	Zhao, Xia (Jean)	506-1	Unpaid Real Estate Commission. Creditor is
21			claiming a priority based upon the fact that the
22			transaction closed after the bankruptcy case was
23			filed. <i>See</i> p. 14-16.

24
 25 A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee's*
 26 *First Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal*
 27 *Rule Of Bankruptcy Procedure 3007—Claim Numbers 33-1, 52-2, 53-1, 62-1, 71-2, 76-1, 79-1,*
 28 *95-1, 135-1, 148-1, 150-2, 151-2, 206-1, 218-1, 345-1, 494-1, 505-1, 506-1, 509-1, 550-1, 551-1,*

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1 552-1, 553-1, 554-1, 559-1, 611-1, 652-1, 661-1, 668-1, 830-1, 842-1, 844-1, 845-1, 853-1, 858-
2 1, 907-1, And 917-1 Based On Improper Assertion Of A Priority Claim For Unpaid Real Estate
3 Commissions are on file with the Clerk’s Office of the United States Bankruptcy Court, 300 Las
4 Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Motion and any
5 supporting declarations may also be obtained from counsel for the Trustee or through the
6 Bankruptcy Court’s website at www.nvb.uscourts.gov.

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

13 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
14 with the court. You *must* also serve your written response on the person who sent you this
15 notice.

16 If you do not file a written response with the court, or if you do not serve your written
17 response on the person who sent you this notice, then:

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

20
21 **NOTICE IS FURTHER GIVEN** that the hearing on said Motion will be held before a
22 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las
23 Vegas, Nevada on May 22, 2020 at 9:30 a.m. The hearing on the Objection will take place in a
24 courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19) pandemic,
25 the Court may conduct a telephonic hearing on the Objection. Please visit the website for the
26 U.S. Bankruptcy Court for the District of Nevada for updates on whether the Court will be
27 conducting telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

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

Dated this 20th day of April, 2020.

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By: /s/ Bradley G. Sims
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