

Electronically Filed On: July 7, 2020

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-GS
Chapter 7

DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF TRUSTEE'S SECOND OMNIBUS OBJECTION TO PROOFS OF CLAIM PURSUANT TO 11 U.S.C. § 502(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007— CLAIM NUMBERS 3-1, 9-1, 10-1, 11-1, 12-1, 14-1, 17-2, 21-2, 22-1, 27-1, 30-1, 35-1, 37-1, 39-1, 43-1, 51-1, 66-1, 67-1, 68-1, 70-1, 75-2, 77-1, 78-1, 80-1, 81-1, 89-1, 90-1, 91-1, 92-1, 94-1, 99-1, 101-1, 102-1, 106-1, 107-1, 110-1, 112-1, 114-1, 116-1, 121-1, 122-1, 124-1, 125-1, 126-1, 127-1, 129-1, 130-1, 131-1, 132-1, 134-1, 138-1, 139-1, 140-1, 141-1, 146-1, 147-1, 149-2, 152-1, 153-1, 154-1, 155-1, 156-1, 157-1, 158-1, 159-1, 161-1, 162-1, 164-1, 165-1, 166-1, 167-1, 170-1, 192-1, 193-1, 194-1, 198-1, 199-1, 200-1, 202-1, 203-1, 204-1, 205-1, 207-1, 208-1, 210-1, 211-1, 212-1, 213-1, 215-1, 216-1, 217-1, 220-1, 222-1, 223-1, 225-1, 226-1, AND 227-1 BASED ON IMPROPER ASSERTION OF A PRIORITY CLAIM BY A LANDLORD FOR A SECURITY DEPOSIT

Date of Hearing: August 13, 2020
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.

HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

Las Vegas, NV 89101

Judge: Honorable Gary Spraker¹

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.

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

3. I make this declaration to support the *Trustee’s Second Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 3-1, 9-1, 10-1, 11-1, 12-1, 14-1,17-2, 21-2, 22-1, 27-1, 30-1, 35-1, 37-1, 39-1, 43-1, 51-1, 66-1, 67-1, 68-1, 70-1, 75-2, 77-1, 78-1, 80-1, 81-1, 89-1, 90-1, 91-1, 92-1, 94-1, 99-1, 101-1, 102-1, 106-1, 107-1, 110-1, 112-1, 114-1,116-1, 121-1, 122-1, 124-1, 125-1, 126-1, 127-1, 129-1, 130-1, 131-1, 132-1, 134-1, 138-1, 139-1, 140-1, 141-1, 146-1, 147-1, 149-2, 152-1, 153-1, 154-1, 155-1, 156-1, 157-1, 158-1, 159-1, 161-1, 162-1, 164-1, 165-1, 166-1, 167-1, 170-1, 192-1, 193-1, 194-1, 198-1, 199-1, 200-1, 202-1, 203-1, 204-1, 205-1, 207-1, 208-1, 210-1, 211-1, 212-1, 213-1, 215-1 216-1, 217-1, 220-1, 222-1, 223-1, 225-1, 226-1, and 227-1 Based On Improper Assertion Of A Priority Claim by a Landlord For a Security Deposit (the “Objection”).2*

...
...
...

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 provided herein, all defined terms shall have the same meaning ascribed to them in the Objection.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

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

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

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

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

10 8. On February 27, 2015, the Court entered an *Order Granting Application for Order*
11 *Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No.
12 128].

13 9. Since its employment, Garden City Group (“GCG”) has been maintaining the
14 Proofs of Claim that have been submitted by creditors.

15 10. On September 30, 2015, Trustee Nelson filed a *Motion for (1) Turnover of Security*
16 *Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11 U.S.C. § 542 and (2)*
17 *Authority to Administer Security Deposits Through the Debtor’s Bankruptcy Estate Pursuant to*
18 *11 U.S.C. § 105(a)* [ECF No. 181] (the “Turnover Motion”).

19 11. The Turnover Motion sought authority for approximately \$707,567.29 – the
20 balance of the Security Deposits that were in the Debtor’s possession as of the Petition Date –
21 held in the IOLTA Account of counsel for the Debtor to be transferred to Trustee Nelson so that
22 the funds could be administered for the benefit of creditors.

23 12. The Turnover Motion was supported by counsel for the Debtor, an accountant
24 employed by the Debtor prior to the Petition Date, and the Nevada Real Estate Division.

25 13. On November 6, 2015, the Court entered an *Order Granting Motion for (1)*
26 *Turnover of Security Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11*

27 _____
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.

1 U.S.C. § 542 and (2) Authority to Administer Security Deposits Through the Debtor's Bankruptcy
2 Estate Pursuant to 11 U.S.C. § 105(a) [ECF No. 196] (the "Turnover Order").

3 14. The Turnover Order provided that the security deposits held in the IOLTA
4 Account of counsel for the Debtor would be transferred to the Debtor's bankruptcy estate and
5 administered pursuant to Section 726.

6 15. On January 13, 2018, Trustee Nelson died.

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

9 17. On January 25, 2015, Yuan Yuan filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$3,518.00 based on a rental security deposit. A true and correct copy
11 of Claim 3-1 is attached hereto as **Exhibit "1"**.

12 18. On February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11
13 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on a rental security deposit. A true and
14 correct copy of Claim 9-1 is attached hereto as **Exhibit "2"**.

15 19. On February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11
16 U.S.C. § 507(a)(7) in the amount of \$900.00 based on a rental security deposit. A true and correct
17 copy of Claim 10-1 is attached hereto as **Exhibit "3"**.

18 20. On February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11
19 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on a rental security deposit. A true and
20 correct copy of Claim 11-1 is attached hereto as **Exhibit "4"**.

21 21. On February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11
22 U.S.C. § 507(a)(7) in the amount of \$1,100.00 based on a rental security deposit. A true and
23 correct copy of Claim 12-1 is attached hereto as **Exhibit "5"**.

24 22. On February 2, 2015, Mimi Wei Lin filed a claim claiming priority under 11
25 U.S.C. § 507(a)(7) in the amount of \$700.00 based on a rental security deposit. A true and correct
26 copy of Claim 14-1 is attached hereto as **Exhibit "6"**.

27 23. On February 9, 2015, Zhongming Feng filed a claim claiming priority under 11
28 U.S.C. § 507(a)(7) in the amount of \$975.00 based on a rental security deposit. A true and correct

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

- 1 copy of Claim 17-2 is attached hereto as **Exhibit “7”**.
- 2 24. On February 9, 2015, Robert Lozares filed a claim claiming priority under 11
3 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on a rental security deposit. A true and
4 correct copy of Claim 22-1 is attached hereto as **Exhibit “8”**.
- 5 25. On February 10, 2015, Liyue Yang filed a claim claiming priority under 11 U.S.C.
6 § 507(a)(7) in the amount of \$1,550.00 based on a rental security deposit. A true and correct copy
7 of Claim 27-1 is attached hereto as **Exhibit “9”**.
- 8 26. On February 10, 2015, Mary Van Meter filed a claim claiming priority under 11
9 U.S.C. § 507(a)(7) in the amount of \$975.00 based on a rental security deposit. A true and correct
10 copy of Claim 21-2 is attached hereto as **Exhibit “10”**.
- 11 27. On February 16, 2015, Yin Lang 99-11 filed a claim claiming priority under 11
12 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on a rental security deposit. A true and
13 correct copy of Claim 30-1 is attached hereto as **Exhibit “11”**.
- 14 28. On February 19, 2015, Wen Chun Wang filed a claim claiming priority under 11
15 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on a rental security deposit. A true and
16 correct copy of Claim 35-1 is attached hereto as **Exhibit “12”**.
- 17 29. On February 22, 2015, Ching – Chao Huang filed a claim claiming priority under
18 11 U.S.C. § 507(a)(7) in the amount of \$2,900.00 based on a rental security deposit. A true and
19 correct copy of Claim 37-1 is attached hereto as **Exhibit “13”**.
- 20 30. On February 22, 2015, Elaine Ng filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,325.00 based on a rental security deposit. A true and correct copy
22 of Claim 39-1 is attached hereto as **Exhibit “14”**.
- 23 31. On March 3, 2015, Apple Revocable Trust filed a claim claiming priority under 11
24 U.S.C. § 507(a)(7) in the amount of \$2,500.00 based on a rental security deposit. A true and
25 correct copy of Claim 68-1 is attached hereto as **Exhibit “15”**.
- 26 32. On March 3, 2015, Weinvestment, LLC filed a claim claiming priority under 11
27 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on a rental security deposit. A true and
28 correct copy of Claim 67-1 is attached hereto as **Exhibit “16”**.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 33. On March 3, 2015, Apple Revocable Trust filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on a rental security deposit. A true and
3 correct copy of Claim 66-1 is attached hereto as **Exhibit “17”**.

4 34. On March 6, 2015, Robert and Tina Gorecke filed a claim claiming priority under
5 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on a rental security deposit. A true and
6 correct copy of Claim 70-1 is attached hereto as **Exhibit “18”**.

7 35. On March 9, 2015, Capitola, LLC filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$300.00 based on a rental security deposit. A true and correct copy of
9 Claim 43-1 is attached hereto as **Exhibit “19”**.

10 36. On March 10, 2015, Cindy Rouw filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,270.00 based on a rental security deposit. A true and correct copy
12 of Claim 75-2 is attached hereto as **Exhibit “20”**.

13 37. On March 10, 2015, Ping He filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,400.00 based on a rental security deposit. A true and correct copy
15 of Claim 77-1 is attached hereto as **Exhibit “21”**.

16 38. On March 11, 2015, Vi Elvira S. Allarde filed a claim claiming priority under 11
17 U.S.C. § 507(a)(7) in the amount of \$2,355.00 based on a rental security deposit. A true and
18 correct copy of Claim 78-1 is attached hereto as **Exhibit “22”**.

19 39. On March 11, 2015, Feifei Lin Bruce filed a claim claiming priority under 11
20 U.S.C. § 507(a)(7) in the amount of \$1,100.00 based on a rental security deposit. A true and
21 correct copy of Claim 80-1 is attached hereto as **Exhibit “23”**.

22 40. On March 11, 2015, Ming Wah Chiu filed a claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$1,125.00 based on a rental security deposit. A true and
24 correct copy of Claim 81-1 is attached hereto as **Exhibit “24”**.

25 41. On March 17, 2015, Teresa Cai & Sean Wang filed a claim claiming priority under
26 11 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on a rental security deposit. A true and
27 correct copy of Claim 89-1 is attached hereto as **Exhibit “25”**.

28 ...

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

- 1 42. On March 17, 2015, Annette Jian Zheng filed a claim for \$3,434.00 and claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on a rental security
3 deposit. A true and correct copy of Claim 90-1 is attached hereto as **Exhibit “26”**.
- 4 43. On March 17, 2015, Ramon Elefano filed a claim claiming priority under 11
5 U.S.C. § 507(a)(7) in the amount of \$1,100.00 based on a rental security deposit. A true and
6 correct copy of Claim 91-1 is attached hereto as **Exhibit “27”**.
- 7 44. On March 18, 2015, Ge Cao and Qi Gou filed a claim claiming priority under 11
8 U.S.C. § 507(a)(7) in the amount of \$2,590.00 based on a rental security deposit. A true and
9 correct copy of Claim 92-1 is attached hereto as **Exhibit “28”**.
- 10 45. On March 19, 2015, Hsin-I Vivian Lin filed a claim claiming priority under 11
11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on a rental security deposit. A true and
12 correct copy of Claim 94-1 is attached hereto as **Exhibit “29”**.
- 13 46. On March 20, 2015, Mark J. Aguilar filed a claim claiming priority under 11
14 U.S.C. § 507(a)(7) in the amount of \$3,400.00 based on a rental security deposit. A true and
15 correct copy of Claim 99-1 is attached hereto as **Exhibit “30”**.
- 16 47. On March 20, 2015, Sno Drilling Tool, Inc. filed a claim claiming priority under
17 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on a rental security deposit. A true and
18 correct copy of Claim 101-1 is attached hereto as **Exhibit “31”**.
- 19 48. On March 20, 2015, Sno Drilling Tool, Inc. filed a claim for \$3,350.00, claiming
20 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on a rental security
21 deposit. A true and correct copy of Claim 102-1 is attached hereto as **Exhibit “32”**.
- 22 49. On March 23, 2015, Sun Palm, LLC filed a claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$3,719.00 based on a rental security deposit. A true and
24 correct copy of Claim 106-1 is attached hereto as **Exhibit “33”**.
- 25 50. On March 23, 2015, Ricky Kong filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$2,483.00 based on a rental security deposit. A true and correct copy
27 of Claim 107-1 is attached hereto as **Exhibit “34”**.
- 28 ...

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 51. On March 23, 2015, Sen Lang filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$2,775.00 based on a rental security deposit. A true and correct copy
3 of Claim 110-1 is attached hereto as **Exhibit “35”**.

4 52. On March 26, 2015, James Chung filed a claim claiming priority under 11 U.S.C.
5 § 507(a)(7) in the amount of \$1,850.00 based on a rental security deposit. A true and correct copy
6 of Claim 112-1 is attached hereto as **Exhibit “36”**.

7 53. On March 27, 2015, Joe H. Zhoe and Dora D. Qui filed a claim claiming priority
8 under 11 U.S.C. § 507(a)(7) in the amount of \$3,500.00 based on a rental security deposit. A true
9 and correct copy of Claim 114-1 is attached hereto as **Exhibit “37”**.

10 54. On March 27, 2015, Down With It Trust filed a claim claiming priority under 11
11 U.S.C. § 507(a)(7) in the amount of \$1,599.00 based on a rental security deposit. A true and
12 correct copy of Claim 116-1 is attached hereto as **Exhibit “38”**.

13 55. On March 30, 2015, Weijun Li and Yao Wang filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on a rental security deposit. A true
15 and correct copy of Claim 121-1 is attached hereto as **Exhibit “39”**.

16 56. On March 30, 2015, Wei Hsu and Jacquelyn Hsu filed a claim claiming priority
17 under 11 U.S.C. § 507(a)(7) in the amount of \$3,285.00 based on a rental security deposit. A true
18 and correct copy of Claim 122-1 is attached hereto as **Exhibit “40”**.

19 57. On April 3, 2015, Lai Ho Ng filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$2,800.00 based on a rental security deposit. A true and correct copy
21 of Claim 124-1 is attached hereto as **Exhibit “41”**.

22 58. On April 3, 2015, Victor Dieu filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$2,100.00 based on a rental security deposit. A true and correct copy
24 of Claim 125-1 is attached hereto as **Exhibit “42”**.

25 59. On April 4, 2015, Zhenghao Zhang filed a claim claiming priority under 11 U.S.C.
26 § 507(a)(7) in the amount of \$2,100.00 based on a rental security deposit. A true and correct copy
27 of Claim 126-1 is attached hereto as **Exhibit “43”**.

28 ...

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 60. On April 4, 2015, Kuong Va Ho filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$8,880.00 based on a rental security deposit. A true and correct copy
3 of Claim 127-1 is attached hereto as **Exhibit “44”**.

4 61. On April 6, 2015, Dongbin Zhang filed a proof of claim, and on April 13, 2015,
5 filed an amended proof of claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of
6 \$1,675.00 based on a rental security deposit. A true and correct copy of Claim 129-2 is attached
7 hereto as **Exhibit “45”**.

8 62. On April 6, 2015, Robert and Pamela Lewis filed a claim claiming priority under
9 11 U.S.C. § 507(a)(7) in the amount of \$375.00 based on a rental security deposit. A true and
10 correct copy of Claim 130-1 is attached hereto as **Exhibit “46”**.

11 63. On April 6, 2015, Robert and Pamela Lewis filed a claim claiming priority under
12 11 U.S.C. § 507(a)(7) in the amount of \$680.00 based on a rental security deposit. A true and
13 correct copy of Claim 131-1 is attached hereto as **Exhibit “47”**.

14 64. On April 6, 2015, Robert and Pamela Lewis filed a claim claiming priority under
15 11 U.S.C. § 507(a)(7) in the amount of \$375.00 based on a rental security deposit. A true and
16 correct copy of Claim 132-1 is attached hereto as **Exhibit “48”**.

17 65. On April 7, 2015, Huanhuan Jin filed a claim for \$14,220.81 and claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$2,379.06 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 134-1 is attached hereto as **Exhibit “49”**.

20 66. On April 7, 2015, Xiaofan Yang filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 138-1 is attached hereto as **Exhibit “50”**.

23 67. On April 7, 2015, Xiaofan Yang filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 139-1 is attached hereto as **Exhibit “51”**.

26 68. On April 7, 2015, Xiaofan Yang filed a claim for \$3,540.00 and claiming priority
27 under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward purchase, lease
28 or rental of property. A true and correct copy of Claim 140-1 is attached hereto as **Exhibit “52”**.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

- 1 69. On April 9, 2015, Ter-Hsien Lin and Bei Ying Lin filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$2,750.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 141-1 is attached hereto as **Exhibit “53”**.
- 4 70. On April 10, 2015, Eaten Huang filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$4,115.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 146-1 is attached hereto as **Exhibit “54”**.
- 7 71. On April 10, 2015, Mae Li Allison filed a claim claiming priority under 11 U.S.C.
8 § 507(a)(7) in the amount of \$4,115.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 147-1 is attached hereto as **Exhibit “55”**.
- 10 72. On April 10, 2015, Michael W. and Annie N. Ma filed a claim, and on April 27,
11 2015 filed an amended claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of
12 \$5,370.00 based on deposit toward purchase, lease or rental of property. A true and correct copy
13 of Claim 149-2 is attached hereto as **Exhibit “56”**.
- 14 73. On April 11, 2015, Kamling Chan Leung filed a claim claiming priority under 11
15 U.S.C. § 507(a)(7) in the amount of \$5,840.00 based on deposit toward purchase, lease or rental
16 of property. A true and correct copy of Claim 152-1 is attached hereto as **Exhibit “57”**.
- 17 74. On April 11, 2015, Ai Ying Luo filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$2,200.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 153-1 is attached hereto as **Exhibit “58”**.
- 20 75. On April 11, 2015, Hardev S. Grewal filed a claim claiming priority under 11
21 U.S.C. § 507(a)(7) in the amount of \$2,900.00 based on deposit toward purchase, lease or rental
22 of property. A true and correct copy of Claim 154-1 is attached hereto as **Exhibit “59”**.
- 23 76. On April 11, 2015, Bo Gan filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 155-1 is attached hereto as **Exhibit “60”**.
- 26 77. On April 13, 2015, Joel Allen Borden, Jr., filed a claim claiming priority under 11
27 U.S.C. § 507(a)(7) in the amount of \$1,235.00 based on deposit toward purchase, lease or rental
28 of property. A true and correct copy of Claim 156-1 is attached hereto as **Exhibit “61”**.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

- 1 78. On April 13, 2015, Hanli Sun and Bai Yan Qian filed a claim for \$3447.00 and
2 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 157-1 is attached hereto as
4 **Exhibit “62”**.
- 5 79. On April 13, 2015, Gene Quinn filed a claim for \$2,992.00 and claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 158-1 is attached hereto as **Exhibit “63”**.
- 8 80. On April 13, 2015, Hanli Sun and Bai Yan Qian filed a claim for \$3013.00 and
9 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward
10 purchase, lease or rental of property. A true and correct copy of Claim 159-1 is attached hereto as
11 **Exhibit “64”**.
- 12 81. On April 14, 2015, Augustus Chang filed a claim claiming priority under 11
13 U.S.C. § 507(a)(7) in the amount of \$4,115.00 based on deposit toward purchase, lease or rental
14 of property. A true and correct copy of Claim 161-1 is attached hereto as **Exhibit “65”**.
- 15 82. On April 14, 2015, Michelle Chou filed a claim claiming priority under 11 U.S.C.
16 § 507(a)(7) in the amount of \$1,625.00 based on deposit toward purchase, lease or rental of
17 property. A true and correct copy of Claim 162-1 is attached hereto as **Exhibit “66”**.
- 18 83. On April 14, 2015, Yu Ping Wang filed a claim claiming priority under 11 U.S.C.
19 § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
20 property. A true and correct copy of Claim 164-1 is attached hereto as **Exhibit “67”**.
- 21 84. On April 14, 2015, Liu Chiu Lan Living Trust filed a claim claiming priority under
22 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or
23 rental of property. A true and correct copy of Claim 165-1 is attached hereto as **Exhibit “68”**.
- 24 85. On April 14, 2015, Liu Chiu Lan Living Trust filed a claim claiming priority under
25 11 U.S.C. § 507(a)(7) in the amount of \$1,225.00 based on deposit toward purchase, lease or
26 rental of property. A true and correct copy of Claim 166-1 is attached hereto as **Exhibit “69”**.
- 27 86. On April 15, 2015, Changzhong Tong filed a claim claiming priority under 11
28 U.S.C. § 507(a)(4) for wages, salaries, or commissions, and U.S.C. § 507(a)(7) in the amount of

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 \$3,335.00 based on deposit toward purchase, lease or rental of property. The attached
2 documentation shows that the claim is based on a rental security deposit. A true and correct copy
3 of Claim 167-1 is attached hereto as **Exhibit “70”**.

4 87. On April 16 2015, Chenrong Shi filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 170-1 is attached hereto as **Exhibit “71”**.

7 88. On April 17, 2015, Chenrong Shi and Yongsheng Yang filed a claim claiming
8 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,495.00 based on deposit toward
9 purchase, lease or rental of property. A true and correct copy of Claim 192-1 is attached hereto as
10 **Exhibit “72”**.

11 89. On April 20, 2015, Xin Long Cheung filed a claim claiming priority under 11
12 U.S.C. § 507(a)(7) in the amount of \$1,675.00 based on deposit toward purchase, lease or rental
13 of property. A true and correct copy of Claim 193-1 is attached hereto as **Exhibit “73”**.

14 90. On April 20, 2015, Bo Tang filed a claim claiming priority under 11 U.S.C. §
15 507(a)(7) in the amount of \$1,575.00 based on deposit toward purchase, lease or rental of
16 property. A true and correct copy of Claim 194-1 is attached hereto as **Exhibit “74”**.

17 91. On April 20, 2015, Walter Wong filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,830.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 198-1 is attached hereto as **Exhibit “75”**.

20 92. On April 21, 2015, Zhouhang Wang filed a claim claiming priority under 11
21 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease or rental
22 of property. A true and correct copy of Claim 199-1 is attached hereto as **Exhibit “76”**.

23 93. On April 21, 2015, Hong Yan and Michael Chuan Wu filed a claim claiming
24 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,825.00 based on deposit toward
25 purchase, lease or rental of property. A true and correct copy of Claim 200-1 is attached hereto as
26 **Exhibit “77”**.

27 94. On April 22, 2015, Hao Wang filed a claim claiming priority under 11 U.S.C. §
28 507(a)(7) in the amount of \$1,472.84 based on deposit toward purchase, lease or rental of

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 property. A true and correct copy of Claim 202-1 is attached hereto as **Exhibit “78”**.

2 95. On April 22, 2015, Ke Xu filed a claim claiming priority under 11 U.S.C. §
3 507(a)(7) in the amount of \$985.00 based on deposit toward purchase, lease or rental of property.

4 A true and correct copy of Claim 203-1 is attached hereto as **Exhibit “79”**.

5 96. On April 22, 2015, A&W Investment, LLC filed a claim claiming priority under
6 11 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or
7 rental of property. A true and correct copy of Claim 204-1 is attached hereto as **Exhibit “80”**.

8 97. On April 22, 2015, CME Mercantile Group, LLC filed a claim claiming priority
9 under 11 U.S.C. § 507(a)(7) in the amount of \$2,860.00 based on deposit toward purchase, lease
10 or rental of property. A true and correct copy of Claim 205-1 is attached hereto as **Exhibit “81”**.

11 98. On April 22, 2015, Steven Ju filed a claim claiming priority under 11 U.S.C. §
12 507(a)(7) in the amount of \$1,470.00 based on deposit toward purchase, lease or rental of
13 property. A true and correct copy of Claim 207-1 is attached hereto as **Exhibit “82”**.

14 99. On April 22, 2015, JJ Investments, LLC filed a claim claiming priority under 11
15 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental
16 of property. A true and correct copy of Claim 208-1 is attached hereto as **Exhibit “83”**.

17 100. On April 22, 2015, Winsor Properties, LLC filed a claim claiming priority under
18 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or
19 rental of property. A true and correct copy of Claim 210-1 is attached hereto as **Exhibit “84”**.

20 101. On April 22, 2015, Winsor Properties, LLC filed a claim claiming priority under
21 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or
22 rental of property. A true and correct copy of Claim 211-1 is attached hereto as **Exhibit “85”**.

23 102. On April 22, 2015, Winsor Properties, LLC filed a claim claiming priority under
24 11 U.S.C. § 507(a)(7) in the amount of \$2,150.00 based on deposit toward purchase, lease or
25 rental of property. A true and correct copy of Claim 212-1 is attached hereto as **Exhibit “86”**.

26 103. On April 23, 2015, Melanie Provost filed a claim claiming priority under 11
27 U.S.C. § 507(a)(7) in the amount of \$570.00 based on deposit toward purchase, lease or rental of
28 property. A true and correct copy of Claim 213-1 is attached hereto as **Exhibit “87”**.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

- 1 104. On April 23, 2015, Julia Louie filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,100.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 215-1 is attached hereto as **Exhibit “88”**.
- 4 105. On April 24, 2015, Jin Bin Li filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,248.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 216-1 is attached hereto as **Exhibit “89”**.
- 7 106. On April 24, 2015, Shu Jen Chen filed a claim claiming priority under an
8 unspecified provision of the bankruptcy code in the amount of \$3,700.00 based on security
9 deposit for a residential lease. A true and correct copy of Claim 217-1 is attached hereto as
10 **Exhibit “90”**.
- 11 107. On April 25, 2015, Ming-Hsi Tsai filed a claim claiming priority under 11 U.S.C.
12 § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental of
13 property. A true and correct copy of Claim 220-1 is attached hereto as **Exhibit “91”**.
- 14 108. On April 27, 2015, Michael W. and Annie N Ma filed a claim claiming priority
15 under 11 U.S.C. § 507(a)(7) in the amount of \$1,445.00 based on deposit toward purchase, lease
16 or rental of property. A true and correct copy of Claim 222-1 is attached hereto as **Exhibit “92”**.
- 17 109. On April 27, 2015, Michael W. and Annie N Ma filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$2,125.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 223-1 is attached hereto as **Exhibit “93”**.
- 20 110. On April 27, 2015, Tami Chun filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 225-1 is attached hereto as **Exhibit “94”**.
- 23 111. On April 27, 2015, Willy Chun and Tami Chun filed a claim claiming priority
24 under 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease
25 or rental of property. A true and correct copy of Claim 226-1 is attached hereto as **Exhibit “95”**.
- 26 112. On April 27, 2015, Willy Chun and Tami Chun filed a claim claiming priority
27 under 11 U.S.C. § 507(a)(7) in the amount of \$2,650.00 based on deposit toward purchase, lease
28 or rental of property. A true and correct copy of Claim 227-1 is attached hereto as **Exhibit “96”**.

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

113. On April 27, 2015, Kelly L. Dickinson filed a claim in the amount of \$2,150.00 and claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 51-1 is attached hereto as **Exhibit “97”**.

114. On February 10, 2020, the Court entered an *Order Granting Ex Parte Motion to Permit the Joinder of Objections to Proofs of Claim Pursuant to Federal Rule of Bankruptcy Procedure 3007(c)* (the “Joinder Order”) [ECF No. 306].

115. The Joinder Order allows the Trustee to object to multiple proofs of claim in a single objection when the legal theory underpinning the objection is identical.

116. Each of the above referenced proofs of claim was timely filed.

117. Each of the above referenced proofs of claim was filed by a landlord asserting a priority claim based upon the deposit, before the commencement of the case, by an individual, of money in connection with the purchase, lease, or rental of property, or the purchase of services, for the personal, family, or household use of such individual.

118. I now seek an order reclassifying the above referenced claims as general unsecured claims.

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

Dated this 5th day of July, 2020.



Shelley D. Krohn, Chapter 7 Trustee