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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-GS
Chapter 7

**EX PARTE MOTION TO EXCEED PAGE
LIMIT PURSUANT TO LOCAL RULE
9014(e)(1) FOR TRUSTEE’S THIRD
OMNIBUS OBJECTION TO PROOFS OF
CLAIM PURSUANT TO 11 U.S.C. §
502(b)(1) AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 233-1, 234-1, 239-1,
241-1, 242-1, 243-1, 244-1, 245-1, 246-1, 247-
1, 248-1, 249-1, 250-1, 251-1, 252-1, 253-1,
254-1, 255-1, 256-1, 257-1, 258-1, 259-1, 260-
1, 261-1, 262-1, 263-1, 264-1, 265-1, 266-1,
267-1, 268-1, 269-1, 270-1, 271-1, 272-1, 273-
1, 274-1, 275-1, 276-1, 277-1, 278-1, 279-1,
280-1, 281-1, 282-1, 284-1, 285-1, 286-1, 287-
1, 288-1, 289-1, 294-1, 295-1, 298-1, 300-1,
301-1, 302-1, 306-1, 308-1, 309-1, 310-1, 311-
1, 312-1, 313-1, 314-1, 315-1, 316-1, 317-1,
318-1, 319-1, 320-1, 321-1, 322-1, 323-1, 324-
1, 325-1, 326-1, 327-1, 328-1, 329-1, 330-1,
331-1, 332-1, 333-1, 332-1, 334-1, 336-1, 337-
1, 343-1, 347-1, 421-1, 424-1, 468-1, 469-1,
470-1, 471-1, 472-1, 473-1, AND 474-1,
BASED ON IMPROPER ASSERTION OF
A PRIORITY CLAIM BY A LANDLORD
FOR A SECURITY DEPOSIT**

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

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1 _____ Judge: Honorable Gary Spraker¹

2 Shelley D. Krohn, the duly appointed Chapter 7 Trustee in the above-captioned
3 bankruptcy case (the “Trustee”), by and through her counsel of record, Jacob L. Houmand, Esq.
4 and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd., respectfully requests leave of the
5 Court pursuant to Local Rule 9014(e)(1) to file the *Trustee’s Third Omnibus Objection To Proofs*
6 *Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—*
7 *Claim Numbers 233-1, 234-1, 239-1, 241-1, 242-1, 243-1, 244-1, 245-1, 246-1, 247-1, 248-1,*
8 *249-1, 250-1, 251-1, 252-1, 253-1, 254-1, 255-1,256-1, 257-1, 258-1, 259-1, 260-1, 261-1, 262-1,*
9 *263-1, 264-1, 265-1, 266-1, 267-1, 268-1, 269-1, 270-1, 271-1, 272-1, 273-1, 274-1, 275-1, 276-*
10 *1, 277-1, 278-1, 279-1, 280-1, 281-1, 282-1, 284-1, 285-1, 286-1, 287-1, 288-1, 289-1, 294-1,*
11 *295-1, 298-1, 300-1, 301-1, 302-1, 306-1, 308-1, 309-1, 310-1, 311-1, 312-1, 313-1, 314-1, 315-*
12 *1, 316-1, 317-1, 318-1, 319-1, 320-1, 321-1, 322-1, 323-1, 324-1, 325-1, 326-1, 327-1, 328-1,*
13 *329-1, 330-1, 331-1, 332-1, 333-1, 332-1, 334-1, 336-1, 337-1, 343-1, 347-1, 421-1, 424-1, 468-*
14 *1, 469-1, 470-1, 471-1, 472-1, 473-1, and 474-1, Based On Improper Assertion Of A Priority*
15 *Claim by a Landlord For a Security Deposit* (the “Objection”) in excess of the twenty (20) page
16 limit as prescribed in Rule 9014(e)(1) of the Local Rules of Bankruptcy Practice.

17 Good cause exists to exceed the page limitation. It is necessary for the Trustee to exceed
18 the page limitation to adequately address the factual allegations and legal analysis set forth in the
19 Objection which exceeds the 20-page limitation by thirteen (13) pages. The Objection is an
20 omnibus objection and the reason for the excess page length is the listing and summary of roughly
21 ninety-nine different claims. The legal argument section comprises only a small portion of the
22 Objection and the excess length is a result of the summary of the claims objected to in the
23 Objection.²

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”.

² 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.

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1 The Trustee additionally requests that the Court waive the requirement under Local Rule
2 9014(e)(1) for a table of authorities and a table of contents. The legal argument section of the
3 Objection is relatively short and straightforward. Had each claim been objected to on an
4 individual basis, none of the respective motions would have exceeded the page length
5 requirement. The Objection has been filed as an omnibus objection to promote judicial economy,
6 and to allow multiple objections to be heard at the same time where a common legal argument is
7 raised. A table of contents and table of authorities will not enhance or simplify the Objection and
8 will potentially confuse claimants who review the Objection.

9 For the foregoing reasons, the Trustee respectfully requests that the Court approve this Ex
10 Parte Motion and authorize the Trustee to file her Motion in excess of the 20-pages limitation as
11 set forth in Local Rule 9014(e)(1), and that the court waive the requirement under Local Rule
12 9014(e)(1) that the Objection provide a table of contents and table of authorities.

13 Dated this 7th day of July, 2020.

14 **HOUAMAND LAW FIRM, LTD.**

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16 By: /s/ Bradley G. Sims
17 Jacob L. Houmand, Esq. (NV Bar No. 12781)
18 Bradley G. Sims, Esq. (NV Bar No. 11713)
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