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Electronically Filed On: July 7, 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

DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF 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: August 13, 2020
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined
Foley Federal Building

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Judge: Honorable Gary Spraker ¹

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 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 (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.

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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, LLC (“GCG”) has been maintaining
14 the 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 April 29, 2015, Wu Wang filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$16,989.50 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 233-1 is attached to the Trustee Declaration as **Exhibit**
12 **“1”**.

13 18. On April 29, 2015, Jiang Xue Kun filed a claim claiming priority under 11 U.S.C.
14 § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 234-1 is attached to the Trustee Declaration as **Exhibit**
16 **“2”**.

17 19. On April 29, 2015, Grace Feng Revocable Trust filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 239-1 is attached to the Trustee
20 Declaration as **Exhibit “3”**.

21 20. On April 29, 2015, Feng Grace Revocable Trust filed a claim claiming priority
22 under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease
23 or rental of property. A true and correct copy of Claim 241-1 is attached to the Trustee
24 Declaration as **Exhibit “4”**.

25 21. On April 29, 2015, Paul Jianbo Feng filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 242-1 is attached to the Trustee Declaration as
28 **Exhibit “5”**.

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1 22. On April 29, 2015, Shan Shan Feng filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 243-1 is attached to the Trustee Declaration as **Exhibit**
4 **“6”**.

5 23. On April 30, 2015, Wai Chuen Li and Yi Feng Yu filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$2,250.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 244-1 is attached to the Trustee
8 Declaration as **Exhibit “7”**.

9 24. On April 30, 2015, Jin Ding Wu filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 245-1 is attached to the Trustee Declaration as **Exhibit**
12 **“8”**.

13 25. On April 30, 2015, Wai Chuen Li and Yi Feng Yu filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,425.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 246-1 is attached to the Trustee
16 Declaration as **Exhibit “9”**.

17 26. On April 30, 2015, Wai Chuen Li and Yi Feng Yu filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 247-1 is attached to the Trustee
20 Declaration as **Exhibit “10”**.

21 27. On May 1, 2015, Karen Feng filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$3,000.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 248-1 is attached to the Trustee Declaration as **Exhibit**
24 **“11”**.

25 28. On May 1, 2015, Karen Feng filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,980.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 249-1 is attached to the Trustee Declaration as **Exhibit**
28 **“12”**.

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1 29. On May 1, 2015, Jusuf Sri M Revocable Trust filed a claim claiming priority under
2 11 U.S.C. § 507(a)(7) in the amount of \$2,959.00 based on deposit toward purchase, lease or
3 rental of property. A true and correct copy of Claim 250-1 is attached to the Trustee Declaration
4 as **Exhibit “13”**.

5 30. On May 1, 2015, Wang Pang Lee filed a claim claiming priority under an
6 unspecified section of the bankruptcy code in the amount of \$3,225.00 based on a security deposit
7 for a rental property. A true and correct copy of Claim 251-1 is attached to the Trustee
8 Declaration as **Exhibit “14”**.

9 31. On May 1, 2015, Xiangyu, LLC filed a claim in the amount of \$2,417.00 claiming
10 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,745.00 based on deposit toward
11 purchase, lease or rental of property. A true and correct copy of Claim 252-1 is attached to the
12 Trustee Declaration as **Exhibit “15”**.

13 32. On May 1, 2015, Stephen Mok filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 253-1 is attached to the Trustee Declaration as **Exhibit**
16 **“16”**.

17 33. On May 1, 2015, Starlight Investments, LLC filed a claim claiming priority under
18 11 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or
19 rental of property. A true and correct copy of Claim 254-1 is attached to the Trustee Declaration
20 as **Exhibit “17”**.

21 34. On May 1, 2015, Starlight Investments, LLC filed a claim claiming priority under
22 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or
23 rental of property. A true and correct copy of Claim 255-1 is attached to the Trustee Declaration
24 as **Exhibit “18”**.

25 35. On May 1, 2015, Stephen Mok and Donglei S Hu filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 256-1 is attached to the Trustee
28 Declaration as **Exhibit “19”**.

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1 36. On May 1, 2015, Shao Fen Huang filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 257-1 is attached to the Trustee Declaration as **Exhibit**
4 **“20”**.

5 37. On May 1, 2015, Guangqing Lin filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$2,225.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 258-1 is attached to the Trustee Declaration as **Exhibit**
8 **“21”**.

9 38. On May 1, 2015, Christina Ying Deng & Chen Zhao filed a claim claiming priority
10 under 11 U.S.C. § 507(a)(7) in the amount of \$1,050.00 based on deposit toward purchase, lease
11 or rental of property. A true and correct copy of Claim 259-1 is attached to the Trustee
12 Declaration as **Exhibit “22”**.

13 39. On May 1, 2015, Christina Ying Deng & Chen Zhao filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,950.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 260-1 is attached to the Trustee
16 Declaration as **Exhibit “23”**.

17 40. On May 1, 2015, Christina Ying Deng & Chen Zhao filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$1,685.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 261-1 is attached to the Trustee
20 Declaration as **Exhibit “24”**.

21 41. On May 1, 2015, Christina Ying Deng and Chen Zhao filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,645.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 262-1 is attached to the
24 Trustee Declaration as **Exhibit “25”**.

25 42. On May 1, 2015, Chester Chih Chieh Pan filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 263-1 is attached to the Trustee Declaration as
28 **Exhibit “26”**.

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1 43. On May 1, 2015, Danna He filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 264-1 is attached to the Trustee Declaration as **Exhibit**
4 **“27”**.

5 44. On May 1, 2015, Danna He filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$3,875.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 265-1 is attached to the Trustee Declaration as **Exhibit**
8 **“28”**.

9 45. On May 1, 2015, Christina Ying Deng and Chen Zhao filed a claim claiming
10 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on deposit toward
11 purchase, lease or rental of property. A true and correct copy of Claim 266-1 is attached to the
12 Trustee Declaration as **Exhibit “29”**.

13 46. On May 1, 2015, Christina Ying Deng and Chen Zhao filed a claim claiming
14 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward
15 purchase, lease or rental of property. A true and correct copy of Claim 267-1 is attached to the
16 Trustee Declaration as **Exhibit “30”**.

17 47. On May 1, 2015, Chang Hsiumei Kang and Wai Huei Kang filed a claim claiming
18 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on deposit toward
19 purchase, lease or rental of property. A true and correct copy of Claim 268-1 is attached to the
20 Trustee Declaration as **Exhibit “31”**.

21 48. On May 1, 2015, Bofang Liu and Xinrong Qin filed a claim claiming priority
22 under 11 U.S.C. § 507(a)(7) in the amount of \$1,100.00 based on deposit toward purchase, lease
23 or rental of property. A true and correct copy of Claim 269-1 is attached to the Trustee
24 Declaration as **Exhibit “32”**.

25 49. On May 1, 2015, Meyer Family Trust filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 270-1 is attached to the Trustee Declaration as
28 **Exhibit “33”**.

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1 50. On May 1, 2015, Meyer Family Trust filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$2,435.00 based on deposit toward purchase, lease or rental
3 of property. A true and correct copy of Claim 271-1 is attached to the Trustee Declaration as
4 **Exhibit “34”**.

5 51. On May 1, 2015, Hoi Sheun Cheung filed a claim claiming priority under 11
6 U.S.C. § 507(a)(7) in the amount of \$1,425.00 based on deposit toward purchase, lease or rental
7 of property. A true and correct copy of Claim 272-1 is attached to the Trustee Declaration as
8 **Exhibit “35”**.

9 52. On May 1, 2015, Dennis Fen S. Cao filed a claim claiming priority under 11
10 U.S.C. § 507(a)(7) in the amount of \$2,684.00 based on deposit toward purchase, lease or rental
11 of property. A true and correct copy of Claim 273-1 is attached to the Trustee Declaration as
12 **Exhibit “36”**.

13 53. On May 1, 2015, Wai Kit Wong and Yan Yan Liu filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$2,400.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 274-1 is attached to the Trustee
16 Declaration as **Exhibit “37”**.

17 54. On May 1, 2015, Jianxin Bi filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$2,750.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 275-1 is attached to the Trustee Declaration as **Exhibit**
20 **“38”**.

21 55. On May 1, 2015, Jianxin Bi filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$2,525.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 276-1 is attached to the Trustee Declaration as **Exhibit**
24 **“39”**.

25 56. On May 1, 2015, Jianxin Bi filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,525.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 277-1 is attached to the Trustee Declaration as **Exhibit**
28 **“40”**.

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- 1 57. On May 1, 2015, Yui Tong Chong and Lai Fong filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 278-1 is attached to the Trustee
4 Declaration as **Exhibit “41”**.
- 5 58. On May 1, 2015, Yui Tong Chong and Lai Fong filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 279-1 is attached to the Trustee
8 Declaration as **Exhibit “42”**.
- 9 59. On May 1, 2015, Yui Tong Chong and Lai Fong filed a claim claiming priority
10 under 11 U.S.C. § 507(a)(7) in the amount of \$825.00 based on deposit toward purchase, lease or
11 rental of property. A true and correct copy of Claim 280-1 is attached to the Trustee Declaration
12 as **Exhibit “43”**.
- 13 60. On May 2, 2015, Gary Chen filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,645.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 281-1 is attached to the Trustee Declaration as **Exhibit**
16 **“44”**.
- 17 61. On May 2, 2015, Chun Yu and Jessica Y Q Chung filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$2,750.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 282-1 is attached to the Trustee
20 Declaration as **Exhibit “45”**.
- 21 62. On May 2, 2015, Summerstone Investments, LLC filed a claim claiming priority
22 under 11 U.S.C. § 507(a)(7) in the amount of \$1,675.00 based on deposit toward purchase, lease
23 or rental of property. A true and correct copy of Claim 284-1 is attached to the Trustee
24 Declaration as **Exhibit “46”**.
- 25 63. On May 2, 2015, Summerstone Property, LLC filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 285-1 is attached to the Trustee
28 Declaration as **Exhibit “47”**.

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- 1 64. On May 2, 2015, Summerstone Holdings, LLC filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$2,250.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 286-1 is attached to the Trustee
4 Declaration as **Exhibit “48”**.
- 5 65. On May 4, 2015, Erson Religioso filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$930.00 based on deposit toward purchase, lease or rental of property.
7 A true and correct copy of Claim 287-1 is attached to the Trustee Declaration as **Exhibit “49”**.
- 8 66. On May 4, 2015, Yuk Wing Chan and Ken Kin Cho Wong filed a claim claiming
9 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward
10 purchase, lease or rental of property. A true and correct copy of Claim 288-1 is attached to the
11 Trustee Declaration as **Exhibit “50”**.
- 12 67. On May 4, 2015, Ping Ping Ang filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$2,440.00 based on deposit toward purchase, lease or rental of
14 property. A true and correct copy of Claim 289-1 is attached to the Trustee Declaration as **Exhibit**
15 **“51”**.
- 16 68. On May 5, 2015, Wei Cao filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,675.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 294-1 is attached to the Trustee Declaration as **Exhibit**
19 **“52”**.
- 20 69. On May 5, 2015, Hong Feng Hu filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 295-1 is attached to the Trustee Declaration as **Exhibit**
23 **“53”**.
- 24 70. On May 5, 2015, Roland and Joan Lau filed a claim claiming priority under 11
25 U.S.C. § 507(a)(7) in the amount of \$1,990.00 based on deposit toward purchase, lease or rental
26 of property. A true and correct copy of Claim 298-1 is attached to the Trustee Declaration as
27 **Exhibit “54”**.
- 28 ...

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- 1 71. On May 5, 2015, Charles Yim and Valerie Chen Yim filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,025.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 300-1 is attached to the
4 Trustee Declaration as **Exhibit “55”**.
- 5 72. On May 5, 2015, Ming K. Lee and Wing C. Lee filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$2,550.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 301-1 is attached to the Trustee
8 Declaration as **Exhibit “56”**.
- 9 73. On May 6, 2015, Warren Lee filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 302-1 is attached to the Trustee Declaration as **Exhibit**
12 **“57”**.
- 13 74. On May 6, 2015, Alexandra Assets, LLC, filed a claim claiming priority under 11
14 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or rental
15 of property. A true and correct copy of Claim 306-1 is attached to the Trustee Declaration as
16 **Exhibit “58”**.
- 17 75. On May 6, 2015, Alexandra Assets, LLC, filed a claim claiming priority under 11
18 U.S.C. § 507(a)(7) in the amount of \$1,625.00 based on deposit toward purchase, lease or rental
19 of property. A true and correct copy of Claim 308-1 is attached to the Trustee Declaration as
20 **Exhibit “59”**.
- 21 76. On May 6, 2015, Alexandra Assets, LLC, filed a claim claiming priority under 11
22 U.S.C. § 507(a)(7) in the amount of \$2,575.00 based on deposit toward purchase, lease or rental
23 of property. A true and correct copy of Claim 309-1 is attached to the Trustee Declaration as
24 **Exhibit “60”**.
- 25 77. On May 6, 2015, Yunfeng Xiao, filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$2,631.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 310-1 is attached to the Trustee Declaration as **Exhibit**
28 **“61”**.

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- 1 78. On May 6, 2015, Hao Tang and Chieu Bui, filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$2,480.00 based on deposit toward purchase, lease or rental
3 of property. A true and correct copy of Claim 311-1 is attached to the Trustee Declaration as
4 **Exhibit “62”**.
- 5 79. On May 6, 2015, Hao Tang and Chieu Bui, filed a claim claiming priority under 11
6 U.S.C. § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental
7 of property. A true and correct copy of Claim 312-1 is attached to the Trustee Declaration as
8 **Exhibit “63”**.
- 9 80. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,725.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 313-1 is attached to the Trustee Declaration as **Exhibit**
12 **“64”**.
- 13 81. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1475.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 314-1 is attached to the Trustee Declaration as **Exhibit**
16 **“65”**.
- 17 82. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 315-1 is attached to the Trustee Declaration as **Exhibit**
20 **“66”**.
- 21 83. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 316-1 is attached to the Trustee Declaration as **Exhibit**
24 **“67”**.
- 25 84. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,425.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 317-1 is attached to the Trustee Declaration as **Exhibit**
28 **“68”**.

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- 1 85. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,725.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 318-1 is attached to the Trustee Declaration as **Exhibit**
4 **“69”**.
- 5 86. On May 6, 2015, Stella Lai, filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 319-1 is attached to the Trustee Declaration as **Exhibit**
8 **“70”**.
- 9 87. On May 6, 2015, Wei Chen Hsu filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$8,211.52 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 320-1 is attached to the Trustee Declaration as **Exhibit**
12 **“71”**.
- 13 88. On May 6, 2015, Zhaoming Hu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 321-1 is attached to the Trustee Declaration as **Exhibit**
16 **“72”**.
- 17 89. On May 6, 2015, Zhaoming Hu filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 322-1 is attached to the Trustee Declaration as **Exhibit**
20 **“73”**.
- 21 90. On May 6, 2015, Zhaoming Hu filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$950.00 based on deposit toward purchase, lease or rental of property.
23 A true and correct copy of Claim 323-1 is attached to the Trustee Declaration as **Exhibit “74”**.
- 24 91. On May 6, 2015, Zhaoming Hu filed a claim claiming priority under 11 U.S.C. §
25 507(a)(7) in the amount of \$1,100.00 based on deposit toward purchase, lease or rental of
26 property. A true and correct copy of Claim 324-1 is attached to the Trustee Declaration as **Exhibit**
27 **“75”**.
- 28 ...

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- 1 92. On May 6, 2015, Zhaoming Hu filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 325-1 is attached to the Trustee Declaration as **Exhibit**
4 **“76”**.
- 5 93. On May 6, 2015, Luen K. Chan filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 326-1 is attached to the Trustee Declaration as **Exhibit**
8 **“77”**.
- 9 94. On May 6, 2015, Richard Chen and Irene Tam filed a claim claiming priority
10 under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease
11 or rental of property. A true and correct copy of Claim 327-1 is attached to the Trustee
12 Declaration as **Exhibit “78”**.
- 13 95. On May 6, 2015, Richard Chen and Irene Tam filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 328-1 is attached to the Trustee
16 Declaration as **Exhibit “79”**.
- 17 96. On May 6, 2015, Richard Chen and Irene Tam filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$1,430.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 329-1 is attached to the Trustee
20 Declaration as **Exhibit “80”**.
- 21 97. On May 6, 2015, Michael Xu and Leah Xu filed a claim claiming priority under 11
22 U.S.C. § 507(a)(7) in the amount of \$1,545.00 based on deposit toward purchase, lease or rental
23 of property. A true and correct copy of Claim 330-1 is attached to the Trustee Declaration as
24 **Exhibit “81”**.
- 25 98. On May 6, 2015, Michael Xu and Leah Xu filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 331-1 is attached to the Trustee Declaration as
28 **Exhibit “82”**.

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- 1 99. On May 7, 2015, Wei Zhuo and Xiaohong Quan filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$6,245.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 332-1 is attached to the Trustee
4 Declaration as **Exhibit “83”**.
- 5 100. On May 7, 2015, Huan-Chwang Wayne Liu and Linda Liu filed a claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward
7 purchase, lease or rental of property. A true and correct copy of Claim 333-1 is attached to the
8 Trustee Declaration as **Exhibit “84”**.
- 9 101. On May 7, 2015, Huan-Chwang Wayne Liu and Linda Liu filed a claim claiming
10 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,925.00 based on deposit toward
11 purchase, lease or rental of property. A true and correct copy of Claim 334-1 is attached to the
12 Trustee Declaration as **Exhibit “85”**.
- 13 102. On May 7, 2015, Winston V. Weng and Dao To Trieu filed a claim claiming
14 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,050.00 based on deposit toward
15 purchase, lease or rental of property. A true and correct copy of Claim 335-1 is attached to the
16 Trustee Declaration as **Exhibit “86”**.
- 17 103. On May 7, 2015, Zhouhang Wang filed a claim claiming priority under 11 U.S.C.
18 § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 336-1 is attached to the Trustee Declaration as **Exhibit**
20 **“87”**.
- 21 104. On May 7, 2015, LKE Wong, LLC filed a claim claiming priority under 11 U.S.C.
22 § 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 337-1 is attached to the Trustee Declaration as **Exhibit**
24 **“88”**.
- 25 105. On May 7, 2015, Wenfeng Li and Xiaoyan Zhu filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,445.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 343-1 is attached to the Trustee
28 Declaration as **Exhibit “89”**.

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1 106. On May 7, 2015, Daniel Jie Qing Yuan and Mei Ling Yu filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,575.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 347-1 is attached to the
4 Trustee Declaration as **Exhibit “90”**.

5 107. On May 8, 2015, Chang Hua Ming and Yu Zhuang filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$1,775.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 421-1 is attached to the Trustee
8 Declaration as **Exhibit “91”**.

9 108. On May 8, 2015, Jing Cheng Luo filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$4,335.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 424-1 is attached to the Trustee Declaration as **Exhibit**
12 **“92”**.

13 109. On May 8, 2015, Doan Huu Lam filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,175.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 468-1 is attached to the Trustee Declaration as **Exhibit**
16 **“93”**.

17 110. On May 8, 2015, Jun Liang Wu and Su Ying Cen filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$2,375.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 469-1 is attached to the Trustee
20 Declaration as **Exhibit “94”**.

21 111. On May 8, 2015, Xiaoli Li filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 470-1 is attached to the Trustee Declaration as **Exhibit**
24 **“95”**.

25 112. On May 8, 2015, Yaqin Huang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 471-1 is attached to the Trustee Declaration as **Exhibit**
28 **“96”**.

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1 113. On May 8, 2015, Johnny Yeh-Chao Chu and Theresa Chu filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,648.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 472-1 is attached to the
4 Trustee Declaration as **Exhibit “97”**.

5 114. On May 8, 2015, Hung Luong filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 473-1 is attached to the Trustee Declaration as **Exhibit**
8 **“98”**.

9 115. On May 8, 2015, 3 M Brothers, LLC filed a claim claiming priority under 11
10 U.S.C. § 507(a)(7) in the amount of \$2,064.80 based on deposit toward purchase, lease or rental
11 of property. A true and correct copy of Claim 474-1 is attached to the Trustee Declaration as
12 **Exhibit “99”**.

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

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

18 118. Each of the above referenced proofs of claim was timely filed.

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

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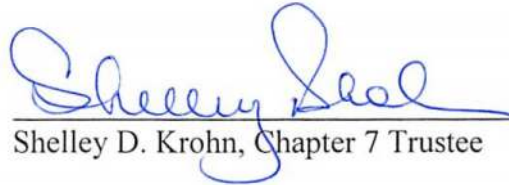
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28 ...

1 120. I now seek an order reclassifying the above referenced claims as general unsecured
2 claims.

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

5 Dated this 2nd day of July, 2020.

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8 Shelley D. Krohn, Chapter 7 Trustee

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