1 Jacob L. Houmand, Esq. (NV Bar No. 12781) Email: Jhoumand@houmandlaw.com Electronically Filed On: June 27, 2019 2 Kyle J. Ortiz, Esq. (NV Bar No. 14252) Email: kortiz/dhoumandlaw.com 905 3 D205 West Russell Road, Building 3, Suite 240 4 Las Vegas, NV 89148 7 Telephone: 702/720-3370 6 Counsel for Shelley D. Krohn, Chapter 7 Trustee 7 DISTRICT OF NEVADA 7 In re: 7 ROBERT C. GRAHAM, LTD. fdba ROB 7 GRAHAM & ASSOCIATES fdba 7 Debtor. 7 Diage: Honorable Bruce T. Beesley ¹ 7 NOTICE IS HEREBY GIVEN that the Motion to Approve Compromise Pursuant to 7 Federal Rule of Bankruptcy Procedure 9019 (the "Motion") was filed by Shelley D. Krohn, the 7 Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, 7 Jacob L. Houmand, Esq, and Kyle J. Ortiz, Esq, of the Houmand Law Firm, Ltd. </th <th></th> <th>Case 16-16655-btb Doc 451 Entered C</th> <th>06/27/19 04:05:51 Page 1 of 3</th>		Case 16-16655-btb Doc 451 Entered C	06/27/19 04:05:51 Page 1 of 3
8 UNITED STATES BANKRUPTCY COURT 9 DISTRICT OF NEVADA 10 In re: 7 ROBERT C. GRAHAM, LTD. fdba ROB GRAHAM & ASSOCIATES fdba LAWYERS WEST, Case No. BK-S-16-16655-BTB Chapter 7 13 Debtor. 14 Debtor. 15 Debtor. 16 Judge: Honorable Bruce T. Becsley ¹ 17 Date of Hearing: 1/uly 30, 2019 Time of Hearing: 1/uly 30, 2019 Time of Hearing: 1/uly 30, 2019 18 Debtor. 19 NOTICE IS HEREBY GIVEN that the Motion to Approve Compromise Pursuant to Federal Rule of Bankruptcy Procedure 9019 (the "Motion") was filed by Shelley D. Krohn, the 20 Federal Rule of Bankruptcy Procedure 9019 (the "Motion") was filed by Shelley D. Krohn, the 21 Laouton seeks an order approving a settlement agreement (the "Settlement Agreement") entered into between the Trustee and American Express Company, American 23 Iunless 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 101-9037. The Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of Bankruptey Procedure will be referred to as "FRDP." The Local Rules of Practice for the United States Bankruptey Court for the District of Nevada shall be referred to as the "Local Rules".	2 3 4 5	Email: jhoumand@houmandlaw.com Kyle J. Ortiz, Esq. (NV Bar No. 14252) Email: kortiz@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	
9 DISTRICT OF NEVADA 10 In re: ROBERT C. GRAHAM, LTD. fdba ROB Case No. BK-S-16-16655-BTB 11 ROBERT C. GRAHAM, LTD. fdba ROB 12 LAWYERS WEST, 13 Debtor. 14 Debtor. 15 Judge: Honorable Bruce T. Beesley ¹ 16 Judge: Honorable Bruce T. Beesley ¹ 17 NOTICE IS HEREBY GIVEN that the Motion to Approve Compromise Pursuant to 18 Federal Rule of Bankruptcy Procedure 9019 (the "Motion") was filed by Shelley D. Krohn, the 19 NOTICE IS HEREBY GIVEN that the Motion to Approve Compromise Pursuant to 10 Federal Rule of Bankruptcy Procedure 9019 (the "Motion") was filed by Shelley D. Krohn, the 11 Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, 12 Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the Houmand Law Firm, Ltd. 13 The Motion seeks an order approving a settlement agreement (the "Settlement 14 Mules of Ederal Rules of Gankruptcy Code, 11 15 U.S.C. §§ 101-1532, and to the Federal Rules of Bankrupty Procedure will be referred to as "FRDP" and the Federal Rules of Bankruptey Procedure will be referred to as "FRDP" and the Federal Rules of Sankruptey Procedure will be referred to as "FRDP" and the Federal Rules	7		
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HOUMAND LAW FIRM, LTD. 9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148 Telephone: (702) 720-3370 Facsimile: (702) 720-3371

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Express Travel Related Services Company, Inc. and American Express National Bank, f/k/a
 American Express Centurion Bank and successor by merger to American Express Bank FSB
 (collectively, "<u>AMEX</u>") that resolves a dispute concerning transfers that were made by the Debtor
 to Valassis in the approximate amount of \$2,711,028.73. Pursuant to Local Rule 9019(c), notice
 is hereby given that the terms of the Settlement Agreement include the following:

a. In consideration of a resolution of the dispute concerning the Transfers
AMEX shall pay the Trustee the sum of \$250,000.00 (the "Settlement Sum") no later than thirty
(30) calendar days after the later to occur of: (a) delivery to counsel for AMEX of a current IRS
Form W-9 completed by the payee of the Settlement Sum; and (b) receipt by AMEX's counsel of
the fully executed Agreement.

b. The Trustee and AMEX shall execute mutual releases. The release provided by AMEX shall also preclude it from filing a proof of claim in the Debtor's bankruptcy pursuant to 11 U.S.C. § 502(h).

c. The Trustee shall hold the Settlement Sum in trust pending approval of the
Settlement Agreement pursuant to FRBP 9019.

The description of the Settlement Agreement set forth herein is a summary only and does not modify or otherwise affect the terms of the Settlement Agreement. To the extent of any conflict between the Settlement Agreement and the description set forth herein, the Settlement Agreement shall control.

A copy of the Motion and the *Declaration of Shelley D. Krohn In Support of Motion to Approve Compromise Pursuant to Federal Rule of Bankruptcy Procedure 9019* are on file with the Clerk's Office of the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Motion and any supporting declarations may also be obtained from counsel for the Trustee or through the Bankruptcy Court's website at www.nvb.uscourts.gov.

NOTICE IS FURTHER GIVEN that if you do not want the Court to grant the relief
 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
 must file an opposition with the Court, and serve a copy of the person making the Motion *no later*

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than fourteen days before the hearing date. The opposition must state your position, set forth all
 relevant facts and legal authority, and be supported by affidavits or declarations that conform to
 Local Rule 9014(c).

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

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

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

NOTICE IS FURTHER GIVEN that the hearing on said Motion will be held before a
United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South,
Second Floor, Courtroom No. 4, Las Vegas, Nevada on July 30, 2019, at 1:30 p.m.

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 27th day of June, 2019.

HOUMAND LAW FIRM, LTD.

By: <u>/s/ Jacob L. Houmand</u> Jacob L. Houmand, Esq. (NV Bar No. 12781) Kyle J. Ortiz, Esq. (NV Bar No. 14252) 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

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