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Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

ROBERT C. GRAHAM, LTD. fdba ROB
GRAHAM & ASSOCIATES fdba
LAWYERS WEST,

Debtor.

Case No. BK-S-16-16655-BTB
Chapter 7

**DECLARATION OF HUBERT KLEIN IN
SUPPORT OF FIRST INTERIM
APPLICATION OF EISNERAMPER LLP
FOR ALLOWANCE OF
COMPENSATION FOR SERVICES
RENDERED DURING THE PERIOD
FROM MARCH 17, 2017 THROUGH
MARCH 6, 2019 AND FOR
REIMBURSEMENT OF EXPENSES
PURSUANT TO 11 U.S.C. §§ 330 AND 331
AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2016**

Date of Hearing: February 12, 2020
Time of Hearing: 1:30 p.m.
Place: Courtroom No. 4, Second Floor
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Bruce T. Beesley

I, Hubert Klein, 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.

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- 1 2. I am a partner with EisnerAmper LLP (the “Firm”).
- 2 3. I make this declaration in support of the *First Interim Application of EisnerAmper*
- 3 *LLP for Allowance of Compensation for Services Rendered During the Period From March 17,*
- 4 *2017 Through March 6, 2019 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330*
- 5 *and 331 and Federal Rule of Bankruptcy Procedure 2016* (the “Fee Application”).¹
- 6 4. The Fee Application concerns professional fees and expenses that were incurred in
- 7 connection with the above-captioned bankruptcy case during the period from March 17, 2017,
- 8 through March 6, 2019 (the “Fee Application Period”).
- 9 5. The Fee Application requests an order (i) approving and allowing on an interim
- 10 basis compensation in the amount of \$107,666.50 for the reasonable and necessary services of the
- 11 Firm during the Fee Application Period, (ii) approving and allowing on an interim basis
- 12 reimbursement of expenses in the amount of \$289.10 that were incurred during the Fee
- 13 Application Period, and (iii) authorizing the Trustee to pay such amounts to the Firm.
- 14 6. The services that the Firm rendered to the Trustee during the Fee Application
- 15 Period benefited the Debtor’s estate and that, therefore, the professional fees and expenses
- 16 requested in the Fee Application should be approved under Sections 330(a) and 331.
- 17 7. I certify that (a) I have read the Fee Application; (b) to the best of my knowledge,
- 18 information and belief, formed after reasonable inquiry, the compensation and expense
- 19 reimbursement sought is in conformity with the Guidelines for Compensation and Expense
- 20 Reimbursement of Professionals and Trustees for the United States Bankruptcy Court, District of
- 21 Nevada (the “Guidelines”) except as specifically noted in the Fee Application; and (c) the
- 22 compensation and expense reimbursement requested are billed at rates, in accordance with
- 23 practices, no less favorable than those customarily employed by the Firm and generally accepted
- 24 by the clients of the Firm.

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 26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
 27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
 28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
 Bankruptcy Procedure will be referred to as “FRBP.” Unless otherwise expressly stated herein,
 all undefined, capitalized terms shall have the meaning ascribed to them in the Fee Application.

1 8. True and correct copies of the billing entries for the work performed by the Firm in
2 connection with the above-captioned bankruptcy case are attached hereto as **Exhibit "1"**.

3 9. I have reviewed the billing entries attached hereto as **Exhibit "1"** and the
4 narratives in the Fee Application describing the work performed by the Firm and believe that such
5 time sheets and narratives are true and correct in all material respects.

6 10. True and correct copies of the itemization of expenses for actual costs incurred by
7 the Firm in connection with the above-captioned bankruptcy case during the Fee Application
8 Period are attached hereto as **Exhibit "1"**.

9 11. I have reviewed the itemization of expenses attached hereto as **Exhibit "1"** and
10 believe that such reports are true and correct in all material respects.

11 12. Except for the Fee Application, the Firm has filed no previous requests for
12 compensation and has not received any payment on account of its services from the Trustee prior
13 to the date hereof.

14 13. The Firm has not been paid or received any compensation from any source for
15 services rendered in connection with this case. There are no agreements or understandings for the
16 Firm to receive fees from any source other than the bankruptcy estate.

17 14. No agreement or understanding exists between the Firm and any other entity for
18 the sharing of compensation received or to be received for services rendered in connection with
19 this case, except as permitted under Section 504(b)(1).

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1 15. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines I
2 sent a copy of the Fee Application, the billing entries and itemization of expenses that are
3 attached hereto as **Exhibit "1"** to the Trustee and she has approved the amounts requested in the
4 Fee Application.

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

7 Dated this ____ day of December, 2019.

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10 Hubert Klein
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