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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

**NOTICE OF HEARING ON MOTION TO
APPROVE COMPROMISE PURSUANT
TO FEDERAL RULE OF BANKRUPTCY
PROCEDURE 9019**

Date of Hearing: June 2, 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. Beesley¹

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 “Trustee”), the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, Jacob L. Houmand of the Houmand Law Firm, Ltd.

The Motion seeks an order approving a settlement agreement (the “Settlement Agreement”) entered into between the Trustee and Bank of America, N.A. (“BOA”) that resolves

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”.

1 the dispute that is the subject of the adversary proceeding captioned *Krohn v. Bank of America*
 2 (Case Number BK-S-19-01028-BTB). Pursuant to Local Rule 9019(c), notice is hereby given
 3 that the terms of the Settlement Agreement include the following:

4 a. BOA shall pay the Trustee the sum of \$215,000 (the “Settlement Sum”).

5 b. The Trustee and BOA shall provide one another mutual releases. The
 6 release provided by BOA shall include the ability to file a proof of claim pursuant to Section
 7 502(h).

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

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

18 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
 19 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
 20 must file an opposition with the Court, and serve a copy of the person making the Motion ***no later***
 21 ***than fourteen days before the hearing date.*** The opposition must state your position, set forth all
 22 relevant facts and legal authority, and be supported by affidavits or declarations that conform to
 23 Local Rule 9014(c).

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

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

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

8
9 **NOTICE IS FURTHER GIVEN** that the hearing on said Motion will be held before a
10 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South,
11 Second Floor, Courtroom No. 4, Las Vegas, Nevada on June 2, 2020, at 1:30 p.m.

12 **NOTICE IS FURTHER GIVEN** that this hearing may be continued from time to time
13 without further notice except for the announcement of any adjourned dates and times at the
14 above-noted hearing or any adjournment thereof.

15 Dated this 24th day of April, 2020.

16 **HOUMAND LAW FIRM, LTD.**

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18 By: /s/ Jacob L. Houmand
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