

Electronically Filed On: July 7, 2020

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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

**NOTICE OF HEARING ON 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
300 Las Vegas Blvd., S.

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Las Vegas, NV 89101

Judge: Honorable Gary Spraker

NOTICE IS HEREBY GIVEN that 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, 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”) was filed by Shelley D. Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd.¹

The Objection seeks to disallow the priority asserted by the following claims pursuant to Section 507(a)(4) and reclassify them as general unsecured claims:

Claimant	Proof of Claim No.	Grounds for objection ²
3 M Brothers, LLC	474-1	Claim improperly asserts priority under 11 U.S.C. § 507(a)(7). This type of priority claim may not be asserted by a landlord. <i>See</i> p. 32-33.
Alexandra Assets, LLC	306-1	Claim improperly asserts priority under 11

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 stated, page references are to the page within this motion stating the legal argument for the objection.

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1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Alexandra Assets, LLC	308-1	Claim improperly asserts priority under 11
4			U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Alexandra Assets, LLC	309-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Ang, Ping Ping	289-1	Claim improperly asserts priority under 11
10			U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Bi, Jianxin	275-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Bi, Jianxin	276-1	Claim improperly asserts priority under 11
16			U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Bi, Jianxin	277-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Cao, Dennis Fen S.	273-1	Claim improperly asserts priority under 11
22			U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Cao, Wei	294-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Chan, Luen K.	326-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Chan, Yuk Wing and	288-1	Claim improperly asserts priority under 11
4	Ken Kin Cho Wong		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Chen, Gary	281-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Chen, Richard and	327-1	Claim improperly asserts priority under 11
10	Irene Tam		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Chen, Richard and	328-1	Claim improperly asserts priority under 11
13	Irene Tam		U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Chen, Richard and	329-1	Claim improperly asserts priority under 11
16	Irene Tam		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Cheung, Hoi Sheun	272-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Chong, Yui Tong and	278-1	Claim improperly asserts priority under 11
22	Lai Fong		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Chong, Yui Tong and	279-1	Claim improperly asserts priority under 11
25	Lai Fong		U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Chong, Yui Tong and	280-1	Claim improperly asserts priority under 11
28			

1	Lai Fong		U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Chu, Johnny Yeh-Chao	472-1	Claim improperly asserts priority under 11
4	and Theresa Chu		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Deng, Christina Ying &	259-1	Claim improperly asserts priority under 11
7	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Deng, Christina Ying &	260-1	Claim improperly asserts priority under 11
10	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Deng, Christina Ying &	261-1	Claim improperly asserts priority under 11
13	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Deng, Christina Ying &	262-1	Claim improperly asserts priority under 11
16	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Deng, Christina Ying &	266-1	Claim improperly asserts priority under 11
19	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Deng, Christina Ying &	267-1	Claim improperly asserts priority under 11
22	Chen Zhao		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Feng, Karen	248-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Feng, Karen	249-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Feng, Paul Jianbo	242-1	Claim improperly asserts priority under 11
4			U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Feng, Shan Shan	243-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Grace Feng Revocable	239-1	Claim improperly asserts priority under 11
10	Trust		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Grace Feng Revocable	241-1	Claim improperly asserts priority under 11
13	Trust		U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	He, Danna	264-1	Claim improperly asserts priority under 11
16			U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	He, Danna	265-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Hsu, Wei Chen	320-1	Claim improperly asserts priority under 11
22			U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Hu, Hong Feng	295-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Hu, Zhaoming	321-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Hu, Zhaoming	322-1	Claim improperly asserts priority under 11
4			U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Hu, Zhaoming	323-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Hu, Zhaoming	324-1	Claim improperly asserts priority under 11
10			U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Hu, Zhaoming	325-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Huang, Shao Fen	257-1	Claim improperly asserts priority under 11
16			U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Huang, Yaqin	471-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Jusuf Sri M Revocable	250-1	Claim improperly asserts priority under 11
22	Trust		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Kang, Chang Hsiumei	268-1	Claim improperly asserts priority under 11
25	and Wai Huei Kang		U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Kun, Jiang Xue	234-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Lai, Stella	313-1	Claim improperly asserts priority under 11
4			U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Lai, Stella	314-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Lai, Stella	315-1	Claim improperly asserts priority under 11
10			U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Lai, Stella	316-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Lai, Stella	317-1	Claim improperly asserts priority under 11
16			U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Lai, Stella	318-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Lai, Stella	319-1	Claim improperly asserts priority under 11
22			U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Lam, Doan Huu	468-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Lau, Roland and Joan	298-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Lee, Ming K. and Wing	301-1	Claim improperly asserts priority under 11
4	C. Lee		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Lee, Wang Pang	251-1	Claim improperly asserts priority under 11
7			U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Lee, Warren	302-1	Claim improperly asserts priority under 11
10			U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Li, Wai Chuen and Yi	244-1	Claim improperly asserts priority under 11
13	Feng Yu		U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Li, Wai Chuen and Yi	246-1	Claim improperly asserts priority under 11
16	Feng Yu		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Li, Wai Chuen and Yi	247-1	Claim improperly asserts priority under 11
19	Feng Yu		U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Li, Wenfeng and	343-1	Claim improperly asserts priority under 11
22	Xiaoyan Zhu		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Li, Xiaoli	470-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Lin, Guangqing	258-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Liu, Bofang and	269-1	Claim improperly asserts priority under 11
4	Xinrong Qin		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Liu, Huan-Chwang	333-1	Claim improperly asserts priority under 11
7	Wayne and Linda Liu		U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Liu, Huan-Chwang	334-1	Claim improperly asserts priority under 11
10	Wayne and Linda Liu		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	LKE Wong, LLC	337-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Luo, Jing Cheng	424-1	Claim improperly asserts priority under 11
16			U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Luong, Hung	473-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Meyer Family Trust	270-1	Claim improperly asserts priority under 11
22			U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Meyer Family Trust	271-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Ming, Chang Hua and	421-1	Claim improperly asserts priority under 11
28			

1	Yu Zhuang		U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Mok, Stephen	253-1	Claim improperly asserts priority under 11
4			U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Mok, Stephen and	256-1	Claim improperly asserts priority under 11
7	Donglei S Hu		U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Pan, Chester Chih	263-1	Claim improperly asserts priority under 11
10	Chieh		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Religioso, Erson	287-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Starlight Investments,	254-1	Claim improperly asserts priority under 11
16	LLC		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Starlight Investments,	255-1	Claim improperly asserts priority under 11
19	LLC		U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Summerstone	284-1	Claim improperly asserts priority under 11
22	Investments, LLC		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Summerstone Property,	285-1	Claim improperly asserts priority under 11
25	LLC		U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Summerstone Holdings,	286-1	Claim improperly asserts priority under 11
28			

1	LLC		U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Tang, Hao and Chieu	311-1	Claim improperly asserts priority under 11
4	Bui		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Tang, Hao and Chieu	312-1	Claim improperly asserts priority under 11
7	Bui		U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Wang, Wu	233-1	Claim improperly asserts priority under 11
10			U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Wang, Zhouhang	336-1	Claim improperly asserts priority under 11
13			U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Wong, Wai Kit and	274-1	Claim improperly asserts priority under 11
16	Yan Yan Liu		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Wu, Jin Ding	245-1	Claim improperly asserts priority under 11
19			U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Wu, Jun Liang and Su	469-1	Claim improperly asserts priority under 11
22	Ying Cen		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
24	Xiangyu, LLC	252-1	Claim improperly asserts priority under 11
25			U.S.C. § 507(a)(7). This type of priority claim
26			may not be asserted by a landlord. <i>See</i> p. 32-33.
27	Xiao, Yunfeng	310-1	Claim improperly asserts priority under 11
28			

1			U.S.C. § 507(a)(7). This type of priority claim
2			may not be asserted by a landlord. <i>See</i> p. 32-33.
3	Xu, Michael and Leah	330-1	Claim improperly asserts priority under 11
4	Xu		U.S.C. § 507(a)(7). This type of priority claim
5			may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Xu, Michael and Leah	331-1	Claim improperly asserts priority under 11
7	Xu		U.S.C. § 507(a)(7). This type of priority claim
8			may not be asserted by a landlord. <i>See</i> p. 32-33.
9	Xu, Michael and Leah	332-1	Claim improperly asserts priority under 11
10	Xu		U.S.C. § 507(a)(7). This type of priority claim
11			may not be asserted by a landlord. <i>See</i> p. 32-33.
12	Yim, Charles and	300-1	Claim improperly asserts priority under 11
13	Valerie Chen Yim		U.S.C. § 507(a)(7). This type of priority claim
14			may not be asserted by a landlord. <i>See</i> p. 32-33.
15	Yu, Chun and Jessica Y	282-1	Claim improperly asserts priority under 11
16	Q Chung		U.S.C. § 507(a)(7). This type of priority claim
17			may not be asserted by a landlord. <i>See</i> p. 32-33.
18	Yuan, Daniel Jie Qing	347-1	Claim improperly asserts priority under 11
19	and Mei Ling Yu		U.S.C. § 507(a)(7). This type of priority claim
20			may not be asserted by a landlord. <i>See</i> p. 32-33.
21	Zhuo, Wei and	332-1	Claim improperly asserts priority under 11
22	Xiaohong Quan		U.S.C. § 507(a)(7). This type of priority claim
23			may not be asserted by a landlord. <i>See</i> p. 32-33.
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27			
28			

HOUAMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240 Las Vegas, NV 89148
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

1 A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee’s*
2 *Third Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal*
3 *Rule Of Bankruptcy Procedure 3007—Claim Numbers 233-1, 234-1, 239-1, 241-1, 242-1, 243-1,*
4 *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,*
5 *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-*
6 *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,*
7 *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-*
8 *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,*
9 *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-*
10 *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*
11 *Improper Assertion Of A Priority Claim by a Landlord For a Security Deposit* are on file with the
12 Clerk’s Office of the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor,
13 Las Vegas, Nevada 89101. Copies of the Motion and any supporting declarations may also be
14 obtained from counsel for the Trustee or through the Bankruptcy Court’s website at
15 www.nvb.uscourts.gov.

16 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
17 sought in the Motion, or if you want the Court to consider your reviews on the Motion, then you
18 must file an opposition with the Court, and serve a copy of the person making the Motion ***no later***
19 ***than fourteen days before the hearing date.*** The opposition must state your position, set forth all
20 relevant facts and legal authority, and be supported by affidavits or declarations that conform to
21 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, Las
11 Vegas, Nevada on August 13, 2020 at 9:30 a.m. The hearing on the Objection will take place in a
12 courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19) pandemic,
13 the Court may conduct a telephonic hearing on the Objection. Please visit the website for the U.S.
14 Bankruptcy Court for the District of Nevada for updates on whether the Court will be conducting
15 telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

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

19 Dated this 7th day of July, 2020.

20 **HOUAMAND LAW FIRM, LTD.**

21 By: /s/ Bradley G. Sims
22 Jacob L. Houmand, Esq. (NV Bar No. 12781)
23 Bradley G. Sims, Esq. (NV Bar No. 11713)
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28 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*