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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

Case No. BK-S-15-10110-GS
Chapter 7

DECLARATION OF SHELLEY D. KROHN IN SUPPORT OF TRUSTEE'S FOURTH OMNIBUS OBJECTION TO PROOFS OF CLAIM PURSUANT TO 11 U.S.C. § 502(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007—CLAIM NUMBERS 475-1, 476-1, 477-1, 478-1, 479-1, 480-1, 481-1, 482-1, 483-1, 484-1, 485-1, 486-1, 487-1, 488-1, 489-1, 490-1, 492-1, 495-1, 496-1, 497-1, 498-1, 499-1, 500-1, 501-1, 502-1, 503-1, 504-1, 507-1, 510-1, 511-1, 512-1, 513-1, 514-1, 515-1, 516-1, 517-1, 518-1, 519-1, 520-1, 521-1, 522-1, 523-1, 524-1, 525-1, 526-1, 528-1, 529-1, 530-1, 531-1, 532-1, 533-1, 534-1, 535-1, 536-1, 537-1, 538-1, 539-1, 540-1, 541-1, 542-1, 543-1, 544-1, 545-1, 546-1, 547-1, 548-1, 549-1, 560-1, 561-1, 562-1, 563-1, 564-1, 565-1, 566-1, 567-1, 568-1, 569-1, 570-1, 571-1, 572-1, 573-1, 574-1, 581-1, 601-1, 613-1, 614-1, 615-1, 616-1, 617-1, 618-1, 619-1, 620-1, 621-1, 622-1, 623-1, 624-1, 625-1, 626-1, 627-1, AND 628-1, BASED ON IMPROPER ASSERTION OF A PRIORITY CLAIM BY A LANDLORD FOR A SECURITY DEPOSIT

Date of Hearing: September 3, 2020
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined

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Judge: Honorable Gary Spraker¹

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 Fourth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 475-1, 476-1, 477-1, 478-1, 479-1, 480-1, 481-1, 482-1, 483-1, 484-1, 485-1, 486-1, 487-1, 488-1, 489-1, 490-1, 492-1, 495-1, 496-1, 497-1, 498-1, 499-1, 500-1, 501-1, 502-1, 503-1, 504-1, 507-1, 510-1, 511-1, 512-1, 513-1, 514-1, 515-1, 516-1, 517-1, 518-1, 519-1, 520-1, 521-1, 522-1, 523-1, 524-1, 525-1, 526-1, 528-1, 529-1, 530-1, 531-1, 532-1, 533-1, 534-1, 535-1, 536-1, 537-1, 538-1, 539-1, 540-1, 541-1, 542-1, 543-1, 544-1, 545-1, 546-1, 547-1, 548-1, 549-1, 560-1, 561-1, 562-1, 563-1, 564-1, 565-1, 566-1, 567-1, 568-1, 569-1, 570-1, 571-1, 572-1, 573-1, 574-1, 581-1, 613-1, 614-1, 615-1, 616-1, 617-1, 618-1, 619-1, 620-1, 621-1, 622-1, 623-1, 624-1, 625-1, 626-1, 627-1, and 628-1, 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.

4. On January 9, 2015 (the “Petition Date”), the Debtor filed a voluntary bankruptcy pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1]³.

5. On January 9, 2015, Victoria L. Nelson (“Trustee Nelson”) was appointed as the Chapter 7 Trustee in the Debtor’s bankruptcy case [ECF No. 4].

6. On January 28, 2015, the Court entered an *Amended Notice of Chapter 7 Bankruptcy Case* [ECF No. 12] that established May 14, 2015, as the deadline for creditors to file proofs of claim.

7. On February 9, 2015, Trustee Nelson filed an *Application for Order Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 88].

8. On February 27, 2015, the Court entered an *Order Granting Application for Order Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 128].

9. Since its employment, Garden City Group (“GCG”) has been maintaining the Proofs of Claim that have been submitted by creditors.

10. On September 30, 2015, Trustee Nelson filed a *Motion for (1) Turnover of Security Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11 U.S.C. § 542 and (2) Authority to Administer Security Deposits Through the Debtor’s Bankruptcy Estate Pursuant to 11 U.S.C. § 105(a)* [ECF No. 181] (the “Turnover Motion”).

11. The Turnover Motion sought authority for approximately \$707,567.29 – the balance of the Security Deposits that were in the Debtor’s possession as of the Petition Date – held in the IOLTA Account of counsel for the Debtor to be transferred to Trustee Nelson so that the funds could be administered for the benefit of creditors.

12. The Turnover Motion was supported by counsel for the Debtor, an accountant employed by the Debtor prior to the Petition Date, and the Nevada Real Estate Division.

13. On November 6, 2015, the Court entered an *Order Granting Motion for (1) Turnover of Security Deposits Held In Trust Account of McDonald Carano Wilson Pursuant to 11*

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 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 \$3,634.00 based on deposit toward purchase, lease or rental
11 of property. A true and correct copy of Claim 475-1 is attached herein as **Exhibit "1"**.

12 18. On May 8, 2015, TCI and YYN Invest Holding Corp. filed a claim claiming
13 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,495.00 based on deposit toward
14 purchase, lease or rental of property. A true and correct copy of Claim 476-1 is attached herein
15 as **Exhibit "2"**.

16 19. On May 8, 2015, TCI and YYN Invest Holding Corp. filed a claim claiming
17 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward
18 purchase, lease or rental of property. A true and correct copy of Claim 477-1 is attached herein
19 as **Exhibit "3"**.

20 20. On May 8, 2015, Iris Ma filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 478-1 is attached herein as **Exhibit "4"**.

23 21. On May 8, 2015, Po Yi Lai filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 479-1 is attached herein as **Exhibit "5"**.

26 22. On May 8, 2015, Kenny Liu and Eva Liu filed a claim claiming priority under 11
27 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental
28 of property. A true and correct copy of Claim 480-1 is attached herein as **Exhibit "6"**.

1 23. On May 8, 2015, Ho Mu Lin filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$3,600.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 481-1 is attached herein as **Exhibit “7”**.

4 24. On May 8, 2015, Ho Mu Lin filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 482-1 is attached herein as **Exhibit “8”**.

7 25. On May 8, 2015, Qijie Zhao and Qize Zhao filed a claim claiming priority under
8 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or
9 rental of property. A true and correct copy of Claim 483-1 is attached herein as **Exhibit “9”**.

10 26. On May 8, 2015, Yao Gao filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 484-1 is attached herein as **Exhibit “10”**.

13 27. On May 8, 2015, David Su Truong and My Loi filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 485-1 is attached herein as **Exhibit “11”**.

16 28. On May 8, 2015, Loui Luu and Muoi Loi filed a claim claiming priority under 11
17 U.S.C. § 507(a)(7) in the amount of \$1,375.00 based on deposit toward purchase, lease or rental
18 of property. A true and correct copy of Claim 486-1 is attached herein as **Exhibit “12”**.

19 29. On May 8, 2015, Xing He Wu and Jian Hua Huang filed a claim claiming priority
20 under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease
21 or rental of property. A true and correct copy of Claim 487-1 is attached herein as **Exhibit “13”**.

22 30. On May 8, 2015, Xing He Wu and Jian Hua Huang filed a claim claiming priority
23 under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease
24 or rental of property. A true and correct copy of Claim 488-1 is attached herein as **Exhibit “14”**.

25 31. On May 8, 2015, Yanhong Tang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$2,100.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 489-1 is attached herein as **Exhibit “15”**.

28 ...

1 32. On May 8, 2015, Doan Huu Lam filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 490-1 is attached herein as **Exhibit "16"**.

4 33. On May 8, 2015, Yue Fang filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,525.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 492-1 is attached herein as **Exhibit "17"**.

7 34. On May 8, 2015, Jeffrey Chen and Shirley Zheng filed a claim claiming priority
8 under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease
9 or rental of property. A true and correct copy of Claim 495-1 is attached herein as **Exhibit "18"**.

10 35. On May 8, 2015, Jeffrey Chen and Shirley Zheng filed a claim claiming priority
11 under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease
12 or rental of property. A true and correct copy of Claim 496-1 is attached herein as **Exhibit "19"**.

13 36. On May 8, 2015, Jeffrey Chen and Shirley Zheng 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 497-1 is attached herein as **Exhibit "20"**.

16 37. On May 8, 2015, Lin Zheng filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$2,864.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 498-1 is attached herein as **Exhibit "21"**.

19 38. On May 8, 2015, Jeffrey Chen and Shirley Zheng filed a claim claiming priority
20 under 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease
21 or rental of property. A true and correct copy of Claim 499-1 is attached herein as **Exhibit "22"**.

22 39. On May 8, 2015, Jeffrey Chen and Shirley Zheng filed a claim claiming priority
23 under 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease
24 or rental of property. A true and correct copy of Claim 500-1 is attached herein as **Exhibit "23"**.

25 40. On May 8, 2015, Jeffrey Chen and Shirley Zheng filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,395.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 501-1 is attached herein as **Exhibit "24"**.

28 ...

1 41. On May 8, 2015, Edwin Chen and Xiao Mei Su filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 502-1 is attached herein as **Exhibit "25"**.

4 42. On May 8, 2015, Edwin Chen and Xiao Mei Su filed a claim claiming priority
5 under 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease
6 or rental of property. A true and correct copy of Claim 503-1 is attached herein as **Exhibit "26"**.

7 43. On May 8, 2015, Tau-San Chou and Shun-Ten Lee filed a claim claiming priority
8 under 11 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease
9 or rental of property. A true and correct copy of Claim 504-1 is attached herein as **Exhibit "27"**.

10 44. On May 11, 2015, Enoch Hon and Ka Wong filed a claim claiming priority under
11 11 U.S.C. § 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or
12 rental of property. A true and correct copy of Claim 507-1 is attached herein as **Exhibit "28"**.

13 45. On May 11, 2015, Hong Yu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$3,600.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 510-1 is attached herein as **Exhibit "29"**.

16 46. On May 11, 2015, Lorraine Dannenberg filed a claim claiming priority under 11
17 U.S.C. § 507(a)(7) in the amount of \$850.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 511-1 is attached herein as **Exhibit "30"**.

19 47. On May 11, 2015, Monita May Fong Cheng filed a claim claiming priority under
20 11 U.S.C. § 507(a)(7) in the amount of \$2,450.00 based on deposit toward purchase, lease or
21 rental of property. A true and correct copy of Claim 512-1 is attached herein as **Exhibit "31"**.

22 48. On May 11, 2015, Chung Lok Louie and Mei Chun Lee filed a claim claiming
23 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward
24 purchase, lease or rental of property. A true and correct copy of Claim 513-1 is attached herein
25 as **Exhibit "32"**.

26 49. On May 11, 2015, Delta Food International, Inc. filed a claim claiming priority
27 under 11 U.S.C. § 507(a)(7) in the amount of \$5,085.00 based on deposit toward purchase, lease
28 or rental of property. A true and correct copy of Claim 514-1 is attached herein as **Exhibit "33"**.

1 50. On May 11, 2015, James Yuen Hung Lau and Shui Tai Lau filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,530.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 515-1 is attached herein
4 as **Exhibit “34”**.

5 51. On May 11, 2015, Jeffrey Dong and Xinbai Zhang filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$2,080.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 516-1 is attached herein as **Exhibit “35”**.

8 52. On May 11, 2015, Christie X. Chen filed a claim claiming priority under 11 U.S.C.
9 § 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 517-1 is attached herein as **Exhibit “36”**.

11 53. On May 11, 2015, Kee Seong Ooi and Jing Xu filed a claim claiming priority
12 under 11 U.S.C. § 507(a)(7) in the amount of \$1,995.00 based on deposit toward purchase, lease
13 or rental of property. A true and correct copy of Claim 518-1 is attached herein as **Exhibit “37”**.

14 54. On May 11, 2015, Stephen Mok filed a claim claiming priority under 11 U.S.C. §
15 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
16 property. A true and correct copy of Claim 519-1 is attached herein as **Exhibit “38”**.

17 55. On May 11, 2015, Francis S. Chan and Lucy Y Chan filed a claim claiming
18 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward
19 purchase, lease or rental of property. A true and correct copy of Claim 520-1 is attached herein
20 as **Exhibit “39”**.

21 56. On May 11, 2015, Huai Xing Liang and Han Ming Tam filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 521-1 is attached herein
24 as **Exhibit “40”**.

25 57. On May 11, 2015, James Lui 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 522-1 is attached herein as **Exhibit “41”**.

28 ...

1 58. On May 11, 2015, Amy Cui Fang and Hep Yuen Lum filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,760.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 523-1 is attached herein
4 as **Exhibit “42”**.

5 59. On May 11, 2015, Edmimi, Inc. filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$3,100.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 524-1 is attached herein as **Exhibit “43”**.

8 60. On May 11, 2015, Lian Wen Lin filed a claim claiming priority under 11 U.S.C. §
9 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 525-1 is attached herein as **Exhibit “44”**.

11 61. On May 11, 2015, Wai Lee and Yu Chun Lee filed a claim claiming priority under
12 11 U.S.C. § 507(a)(7) in the amount of \$1,530.00 based on deposit toward purchase, lease or
13 rental of property. A true and correct copy of Claim 526-1 is attached herein as **Exhibit “45”**.

14 62. On May 11, 2015, Li Feng filed a claim claiming priority under 11 U.S.C. §
15 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of
16 property. A true and correct copy of Claim 528-1 is attached herein as **Exhibit “46”**.

17 63. On May 11, 2015, Li Feng filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 529-1 is attached herein as **Exhibit “47”**.

20 64. On May 11, 2015, Li Feng filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 530-1 is attached herein as **Exhibit “48”**.

23 65. On May 11, 2015, Hamilton Lei filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$775.00 based on deposit toward purchase, lease or rental of property.
25 A true and correct copy of Claim 531-1 is attached herein as **Exhibit “49”**.

26 66. On May 11, 2015, Shirley Lam filed a claim claiming priority under 11 U.S.C. §
27 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
28 property. A true and correct copy of Claim 532-1 is attached herein as **Exhibit “50”**.

1 67. On May 11, 2015, Wai Lee and Yu Chun Lee filed a claim claiming priority under
2 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or
3 rental of property. A true and correct copy of Claim 533-1 is attached herein as **Exhibit “51”**.

4 68. On May 11, 2015, James Lui filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,925.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 534-1 is attached herein as **Exhibit “52”**.

7 69. On May 11, 2015, Wayne Chan filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$2,325.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 535-1 is attached herein as **Exhibit “53”**.

10 70. On May 11, 2015, Thanh Tang filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 536-1 is attached herein as **Exhibit “54”**.

13 71. On May 11, 2015, J L C General Corp. filed a claim claiming priority under 11
14 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental
15 of property. A true and correct copy of Claim 537-1 is attached herein as **Exhibit “55”**.

16 72. On May 11, 2015, Lan Sui Zeng filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 538-1 is attached herein as **Exhibit “56”**.

19 73. On May 11, 2015, Hao Ran He, Qi Ping Zhu and Qi Hong Zhu filed a claim
20 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,750.00 based on deposit
21 toward purchase, lease or rental of property. A true and correct copy of Claim 539-1 is attached
22 herein as **Exhibit “57”**.

23 74. On May 11, 2015, Zhiying, Inc. filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 540-1 is attached herein as **Exhibit “58”**.

26 75. On May 11, 2015, Thanh Tang and Alyssa Tang filed a claim claiming priority
27 under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease
28 or rental of property. A true and correct copy of Claim 541-1 is attached herein as **Exhibit “59”**.

1 76. On May 11, 2015, Hsing Fang Lee and Huitang Ma filed a claim claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$2,075.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 542-1 is attached herein as **Exhibit “60”**.

4 77. On May 11, 2015, Howard Chan and Susan Liang filed a claim claiming priority
5 under 11 U.S.C. § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease
6 or rental of property. A true and correct copy of Claim 543-1 is attached herein as **Exhibit “61”**.

7 78. On May 11, 2015, Wayne Chan filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$1,110.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 544-1 is attached herein as **Exhibit “62”**.

10 79. On May 11, 2015, Jie Zhu filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 545-1 is attached herein as **Exhibit “63”**.

13 80. On May 11, 2015, Thanh Tang filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 546-1 is attached herein as **Exhibit “64”**.

16 81. On May 11, 2015, Hung Kin Cheung and Mi Kuen Ching filed a claim claiming
17 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward
18 purchase, lease or rental of property. A true and correct copy of Claim 547-1 is attached herein
19 as **Exhibit “65”**.

20 82. On May 11, 2015, S H B 2, LLC filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 548-1 is attached herein as **Exhibit “66”**.

23 83. On May 11, 2015, Susan Liang filed a claim claiming priority under 11 U.S.C. §
24 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 549-1 is attached herein as **Exhibit “67”**.

26 84. On May 11, 2015, Wai Chung Ching filed a claim claiming priority under 11
27 U.S.C. § 507(a)(7) in the amount of \$4,100.00 based on deposit toward purchase, lease or rental
28 of property. A true and correct copy of Claim 560-1 is attached herein as **Exhibit “68”**.

1 85. On May 11, 2015, Ho Mu Lin Ching filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental
3 of property. A true and correct copy of Claim 561-1 is attached herein as **Exhibit “69”**.

4 86. On May 11, 2015, Jenny Zheng Wong and Pak Hoi Wong filed a claim claiming
5 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,550.00 based on deposit toward
6 purchase, lease or rental of property. A true and correct copy of Claim 562-1 is attached herein
7 as **Exhibit “70”**.

8 87. On May 11, 2015, Jenny Zheng Wong, Pak Hoi Wong, and Ella Wong filed a
9 claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$4,200.00 based on deposit
10 toward purchase, lease or rental of property. A true and correct copy of Claim 563-1 is attached
11 herein as **Exhibit “71”**.

12 88. On May 11, 2015, Qi Hong Zhu filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$1,645.00 based on deposit toward purchase, lease or rental of
14 property. A true and correct copy of Claim 564-1 is attached herein as **Exhibit “72”**.

15 89. On May 11, 2015, Janna Ngu and Angie Ngu filed a claim claiming priority under
16 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or
17 rental of property. A true and correct copy of Claim 565-1 is attached herein as **Exhibit “73”**.

18 90. On May 11, 2015, Kin K. Hong filed a claim claiming priority under 11 U.S.C. §
19 507(a)(7) in the amount of \$2,500.00 based on deposit toward purchase, lease or rental of
20 property. A true and correct copy of Claim 566-1 is attached herein as **Exhibit “74”**.

21 91. On May 11, 2015, Phyllis La filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$2,700.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 567-1 is attached herein as **Exhibit “75”**.

24 92. On May 11, 2015, William Liu filed a claim claiming priority under 11 U.S.C. §
25 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of
26 property. A true and correct copy of Claim 568-1 is attached herein as **Exhibit “76”**.

27 93. On May 11, 2015, Johnny Y. Huang filed a claim claiming priority under 11
28 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental

1 of property. A true and correct copy of Claim 569-1 is attached herein as **Exhibit "77"**.

2 94. On May 11, 2015, Zi Fan Lei and Pei No Lei filed a claim claiming priority under
3 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or
4 rental of property. A true and correct copy of Claim 570-1 is attached herein as **Exhibit "78"**.

5 95. On May 11, 2015, Meisheng Zhu filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 571-1 is attached herein as **Exhibit "79"**.

8 96. On May 11, 2015, Jimmy Nguyen filed a claim claiming priority under 11 U.S.C.
9 § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 572-1 is attached herein as **Exhibit "80"**.

11 97. On May 11, 2015, Ho Mu Lin filed a claim claiming priority under 11 U.S.C. §
12 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease or rental of
13 property. A true and correct copy of Claim 573-1 is attached herein as **Exhibit "81"**.

14 98. On May 11, 2015, Ricky Leung and Hsueh Mei Leong filed a claim claiming
15 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,500.00 based on deposit toward
16 purchase, lease or rental of property. A true and correct copy of Claim 574-1 is attached herein
17 as **Exhibit "82"**.

18 99. On May 11, 2015, Jun-Fang Zhou filed a claim claiming priority under 11 U.S.C. §
19 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or rental of
20 property. A true and correct copy of Claim 581-1 is attached herein as **Exhibit "83"**.

21 100. On May 11, 2015, Ling Chen Chien filed a claim for \$6,125.00 and claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 613-1 is attached herein as
24 **Exhibit "84"**.

25 101. On May 11, 2015, Kin Kwan and Sandy Liu filed a claim for \$3,600.00 and
26 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,775.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 614-1 is attached herein as
28 **Exhibit "85"**.

1 102. On May 11, 2015, Kin Kwan and Sandy Liu filed a claim claiming priority under
2 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or
3 rental of property. A true and correct copy of Claim 615-1 is attached herein as **Exhibit “86”**.

4 103. On May 11, 2015, Fengbin Jin filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,395.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 616-1 is attached herein as **Exhibit “87”**.

7 104. On May 11, 2015, JMTA Properties, LLC filed a claim claiming priority under 11
8 U.S.C. § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental
9 of property. A true and correct copy of Claim 617-1 is attached herein as **Exhibit “88”**.

10 105. On May 11, 2015, Jimmy Nguyen filed a claim claiming priority under 11 U.S.C.
11 § 507(a)(7) in the amount of \$1,405.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 618-1 is attached herein as **Exhibit “89”**.

13 106. On May 11, 2015, Zhong Rong Zhou filed a claim claiming priority under 11
14 U.S.C. § 507(a)(7) in the amount of \$1,379.00 based on deposit toward purchase, lease or rental
15 of property. A true and correct copy of Claim 619-1 is attached herein as **Exhibit “90”**.

16 107. On May 11, 2015, Christina Kim and Richard Kim filed a claim claiming priority
17 under 11 U.S.C. § 507(a)(7) in the amount of \$2,095.00 based on deposit toward purchase, lease
18 or rental of property. A true and correct copy of Claim 620-1 is attached herein as **Exhibit “91”**.

19 108. On May 11, 2015, Juanito Chua and Juliet T. Chua filed a claim claiming priority
20 under 11 U.S.C. § 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease
21 or rental of property. A true and correct copy of Claim 621-1 is attached herein as **Exhibit “92”**.

22 109. On May 11, 2015, Lan Sui Zeng filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 622-1 is attached herein as **Exhibit “93”**.

25 110. On May 11, 2015, Alfredo Chan filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,625.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 623-1 is attached herein as **Exhibit “94”**.

28 . . .

111. On May 11, 2015, Juanito Chua and Juliet T. Chua filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,675.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 624-1 is attached herein as **Exhibit “95”**.

112. On May 11, 2015, Thomas Z. Zhu filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 625-1 is attached herein as **Exhibit “96”**.

113. On May 11, 2015, Ling Peng Huang filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,730.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 626-1 is attached herein as **Exhibit “97”**.

114. On May 11, 2015, Lan Sui Zeng filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 627-1 is attached herein as **Exhibit “98”**.

115. On May 11, 2015, Nathan Lui filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 628-1 is attached herein as **Exhibit “99”**.

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

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

119. Each of the above referenced proofs of claim was timely filed.

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

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1 121. 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 24 day of July, 2020.

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8 Shelley D. Krohn, Chapter 7 Trustee
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