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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
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**

Date of Hearing: September 3, 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 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”) 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	475-1	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.
Chan, Alfredo	623-1	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	Chan, Francis S. and	520-1	Claim improperly asserts priority under 11
4	Lucy Y Chan		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	Chan, Howard and	543-1	Claim improperly asserts priority under 11
7	Susan Liang		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	Chan, Wayne	535-1	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	Chan, Wayne	544-1	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	Chen, Christie X.	517-1	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	Chen, Edwin and Xiao	502-1	Claim improperly asserts priority under 11
19	Mei Su		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	Chen, Edwin and Xiao	503-1	Claim improperly asserts priority under 11
22	Mei Su		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	Chen, Jeffrey and	495-1	Claim improperly asserts priority under 11
25	Shirley Zheng		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	Chen, Jeffrey and	496-1	Claim improperly asserts priority under 11
28			

1	Shirley Zheng		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	Chen, Jeffrey and	497-1	Claim improperly asserts priority under 11
4	Shirley Zheng		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, Jeffrey and	499-1	Claim improperly asserts priority under 11
7	Shirley Zheng		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, Jeffrey and	500-1	Claim improperly asserts priority under 11
10	Shirley Zheng		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, Jeffrey and	501-1	Claim improperly asserts priority under 11
13	Shirley Zheng		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	Cheng, Monita May	512-1	Claim improperly asserts priority under 11
16	Fong		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, Hung Kin and	547-1	Claim improperly asserts priority under 11
19	Mi Kuen Ching		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	Chien, Ling Chen	613-1	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	Ching, Ho Mu Lin	561-1	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	Ching, Wai Chung	560-1	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	Chou, Tau-San and	504-1	Claim improperly asserts priority under 11
4	Shun-Ten 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	Chua, Juanito and Juliet	621-1	Claim improperly asserts priority under 11
7	T. Chua		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	Chua, Juanito and Juliet	624-1	Claim improperly asserts priority under 11
10	T. Chua		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	Dannenberg, Lorraine	511-1	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	Delta Food	514-1	Claim improperly asserts priority under 11
16	International, Inc.		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	Dong, Jeffrey and	516-1	Claim improperly asserts priority under 11
19	Xinbai Zhang		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	Edmimi, Inc.	524-1	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	Fang, Amy Cui and	523-1	Claim improperly asserts priority under 11
25	Hep Yuen Lum		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	Fang, Yue	492-1	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, Li	528-1	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, Li	529-1	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	Feng, Li	530-1	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	Gao, Yao	484-1	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	He, Hao Ran, Qi Ping	539-1	Claim improperly asserts priority under 11
16	Zhu and Qi Hong Zhu		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	Hon, Enoch and Ka	507-1	Claim improperly asserts priority under 11
19	Wong		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	Hong, Kin K.	566-1	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	Huang, Johnny Y.	569-1	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	Huang, Ling Peng	626-1	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	J L C General Corp.	537-1	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	Jin, Fengbin	616-1	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	JMTA Properties, LLC	617-1	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	Kim, Christina and	620-1	Claim improperly asserts priority under 11
13	Richard Kim		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	Kwan, Kin and Sandy	614-1	Claim improperly asserts priority under 11
16	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	Kwan, Kin and Sandy	615-1	Claim improperly asserts priority under 11
19	Liu		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	La, Phyllis	567-1	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	Lai, Po Yi	479-1	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	Lam, Doan Huu	490-1	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	Lam, Shirley	532-1	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	Lau, James Yuen Hung	515-1	Claim improperly asserts priority under 11
7	and Shui Tai Lau		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, Hsing Fang and	542-1	Claim improperly asserts priority under 11
10	Huitang Ma		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	Lee, Wai and Yu Chun	526-1	Claim improperly asserts priority under 11
13	Lee		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	Lee, Wai and Yu Chun	533-1	Claim improperly asserts priority under 11
16	Lee		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	Lei, Hamilton	531-1	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	Lei, Zi Fan and Pei No	570-1	Claim improperly asserts priority under 11
22	Lei		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	Leung, Ricky and	574-1	Claim improperly asserts priority under 11
25	Hsueh Mei Leong		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	Liang, Huai Xing and	521-1	Claim improperly asserts priority under 11
28			

1	Han Ming Tam		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	Liang, Susan	549-1	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	Lin, Ho Mu	481-1	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	Lin, Ho Mu	482-1	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	Lin, Ho Mu	573-1	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	Lin, Lian Wen	525-1	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	Liu, Kenny and Eva	480-1	Claim improperly asserts priority under 11
19	Liu		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	Liu, William	568-1	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	Louie, Chung Lok and	513-1	Claim improperly asserts priority under 11
25	Mei Chun Lee		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	Lui, James	522-1	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	Lui, James	534-1	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	Nathan Lui	628-1	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	Luu, Loui and Muoi	486-1	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	Ma, Iris	478-1	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	Mok, Stephen	519-1	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	Ngu, Janna and Angie	565-1	Claim improperly asserts priority under 11
19	Ngu		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	Nguyen, Jimmy	572-1	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	Nguyen, Jimmy	618-1	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	Ooi, Kee Seong and	518-1	Claim improperly asserts priority under 11
28			

1	Jing Xu		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	S H B 2, LLC	548-1	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	Tang, Thanh	536-1	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	Tang, Thanh	546-1	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	Tang, Thanh and	541-1	Claim improperly asserts priority under 11
13	Alyssa Tang		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	Tang, Yanhong	489-1	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	TCl and YYN Invest	476-1	Claim improperly asserts priority under 11
19	Holding Corp.		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	TCl and YYN Invest	477-1	Claim improperly asserts priority under 11
22	Holding Corp.		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	Truong, David Su and	485-1	Claim improperly asserts priority under 11
25	My Loi		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	Wong, Jenny Zheng	562-1	Claim improperly asserts priority under 11
28			

1	and Pak Hoi Wong		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	Wong, Jenny Zheng,	563-1	Claim improperly asserts priority under 11
4	Pak Hoi Wong, and		U.S.C. § 507(a)(7). This type of priority claim
5	Ella Wong		may not be asserted by a landlord. <i>See</i> p. 32-33.
6	Wu, Xing He and Jian	487-1	Claim improperly asserts priority under 11
7	Hua Huang		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	Wu, Xing He and Jian	488-1	Claim improperly asserts priority under 11
10	Hua Huang		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	Yu, Hong	510-1	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	Zeng, Lan Sui	538-1	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	Zeng, Lan Sui	622-1	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	Zeng, Lan Sui	627-1	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	Zhao, Qijie and Qize	483-1	Claim improperly asserts priority under 11
25	Zhao		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	Zheng, Lin	498-1	Claim improperly asserts priority under 11
28			

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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	Zhiying, Inc.	540-1	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	Zhou, Jun-Fang	581-1	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	Zhou, Zhong Rong	619-1	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	Zhu, Jie	545-1	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	Zhu, Meisheng	571-1	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	Zhu, Qi Hong	564-1	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	Zhu, Thomas Z.	625-1	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

25 A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee's*

26 *Fourth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal*

27 *Rule Of Bankruptcy Procedure 3007—Claim Numbers 475-1, 476-1, 477-1, 478-1, 479-1, 480-1,*

28 *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-*

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1 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,
2 515-1, 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-
3 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,
4 543-1, 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-
5 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,
6 617-1, 618-1, 619-1, 620-1, 621-1, 622-1, 623-1, 624-1, 625-1, 626-1, 627-1, and 628-1, Based
7 *On Improper Assertion Of A Priority Claim by a Landlord For a Security Deposit* are on file with
8 the Clerk’s Office of the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth
9 Floor, Las Vegas, Nevada 89101. Copies of the Motion and any supporting declarations may also
10 be obtained from counsel for the Trustee or through the Bankruptcy Court’s website at
11 www.nvb.uscourts.gov.

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

18 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
19 with the court. You *must* also serve your written response on the person who sent you this
20 notice.
21 If you do not file a written response with the court, or if you do not serve your written
22 response on the person who sent you this notice, then:
23

- 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.

24
25 **NOTICE IS FURTHER GIVEN** that the hearing on said Motion will be held before a
26 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las
27 Vegas, Nevada on September 3, 2020 at 9:30 a.m. The hearing on the Objection will take place
28 in a courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19)

1 pandemic, the Court may conduct a telephonic hearing on the Objection. Please visit the website
2 for the U.S. Bankruptcy Court for the District of Nevada for updates on whether the Court will be
3 conducting telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

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

7 Dated this 24th day of July, 2020.

8 **HOUMAND LAW FIRM, LTD.**

9
10 By: /s/ Bradley G. Sims
11 Jacob L. Houmand, Esq. (NV Bar No. 12781)
12 Bradley G. Sims, Esq. (NV Bar No. 11713)
13 9205 West Russell Road, Building 3, Suite 240
14 Las Vegas, NV 89148
15 Telephone: 702/720-3370
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17 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

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