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6 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

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

**EX PARTE MOTION TO EXCEED PAGE
LIMIT PURSUANT TO LOCAL RULE
9014(e)(1) FOR TRUSTEE’S FIFTH
OMNIBUS OBJECTION TO PROOFS OF
CLAIM PURSUANT TO 11 U.S.C. §
502(b)(1) AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 629-1, 630-1, 631-1,
632-1, 633-1, 634-1, 635-1, 636-1, 637-1, 638-
1, 639-1, 640-1, 641-1, 642-1, 643-1, 644-1,
646-1, 647-1, 648-1, 649-1, 650-1, 651-1, 653-
1, 654-1, 655-1, 656-1, 657-1, 658-1, 57-2, 55-
1, 662-1, 663-1, 664-1, 665-1, 670-1, 674-1,
676-1, 679-1, 680-1, 682-1, 684-1, 685-1, 686-
1, 687-1, 688-1, 689-1, 690-1, 691-1, 692-1,
693-1, 695-1, 696-1, 697-1, 698-1, 699-1, 700-
1, 701-1, 702-1, 703-1, 705-1, 706-1, 707-1,
708-1, 709-1, 710-1, 711-1, 712-1, 713-1, 715-
1, 716-1, 718-1, 719-1, 720-1, 721-1, 723-1,
724-1, 725-1, 726-1, 727-1, 728-1, 729-1, 730-
1, 731-1, 732-1, 737-1, 741-1, 742-1, 743-1,
744-1, 745-1, 746-1, 747-1, 748-1, 749-1,
AND 750-1, BASED ON IMPROPER
ASSERTION OF A PRIORITY CLAIM
BY A LANDLORD FOR A SECURITY
DEPOSIT**

Date of Hearing: N/A
Time of Hearing: N/A

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1 _____ Judge: Honorable Gary Spraker¹

2 Shelley D. Krohn, the duly appointed Chapter 7 Trustee in the above-captioned
3 bankruptcy case (the “Trustee”), by and through her counsel of record, Jacob L. Houmand, Esq.
4 and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd., respectfully requests leave of the
5 Court pursuant to Local Rule 9014(e)(1) to file the *Trustee’s Fifth Omnibus Objection To Proofs*
6 *Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—*
7 *Claim Numbers 629-1, 630-1, 631-1, 632-1, 633-1, 634-1, 635-1, 636-1, 637-1, 638-1, 639-1,*
8 *640-1, 641-1, 642-1, 643-1, 644-1, 646-1, 647-1, 648-1, 649-1, 650-1, 651-1, 653-1, 654-1, 655-*
9 *1, 656-1, 657-1, 658-1, 57-2, 55-1, 662-1, 663-1, 664-1, 665-1, 670-1, 674-1, 676-1, 679-1, 680-*
10 *1, 682-1, 684-1, 685-1, 686-1, 687-1, 688-1, 689-1, 690-1, 691-1, 692-1, 693-1, 695-1, 696-1,*
11 *697-1, 698-1, 699-1, 700-1, 701-1, 702-1, 703-1, 705-1, 706-1, 707-1, 708-1, 709-1, 710-1, 711-*
12 *1, 712-1, 713-1, 715-1, 716-1, 718-1, 719-1, 720-1, 721-1, 723-1, 724-1, 725-1, 726-1, 727-1,*
13 *728-1, 729-1, 730-1, 731-1, 732-1, 737-1, 741-1, 742-1, 743-1, 744-1, 745-1, 746-1, 747-1, 748-*
14 *1, 749-1, and 750-1, Based On Improper Assertion Of A Priority Claim by a Landlord For a*
15 *Security Deposit* (the “Objection”) in excess of the twenty (20) page limit as prescribed in FRBP
16 9014(e)(1).

17 Good cause exists to exceed the page limitation. It is necessary for the Trustee to exceed
18 the page limitation to adequately address the factual allegations and legal analysis set forth in the
19 Objection which exceeds the 20-page limitation by thirteen (13) pages. The Objection is an
20 omnibus objection and the reason for the excess page length is the listing and summary of roughly
21 ninety-five (95) different claims. The legal argument section comprises only a limited portion of
22 the Objection and the excess length is a result of the summary of the claims objected to in the
23 Objection.

24 ...

25 _____
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.” The Local Rules of Practice for the United
States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

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1 The Trustee additionally requests that the Court waive the requirement under Local Rule
2 9014(e)(1) for a table of authorities and a table of contents. The legal argument section of the
3 Objection is straightforward. Had each claim been objected to on an individual basis, none of the
4 respective motions would have exceeded the page length requirement. The Objection has been
5 filed as an omnibus objection to promote judicial economy, and to allow multiple objections to be
6 heard at the same time where a common legal argument is raised. A table of contents and table of
7 authorities will not enhance or simplify the Objection and will potentially confuse claimants who
8 review the Objection.

9 For the foregoing reasons, the Trustee respectfully requests that the Court approve this Ex
10 Parte Motion and authorize the Trustee to file her Motion in excess of the 20-pages limitation as
11 set forth in Local Rule 9014(e)(1), and that the court waive the requirement under Local Rule
12 9014(e)(1) that the Objection provide a table of contents and table of authorities.

13 Dated this 24th day of July, 2020.

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