

Electronically Filed On: July 24, 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

**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: September 3, 2020
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

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Judge: Honorable Gary Spraker ¹

Shelley D. Krohn, the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case (the “Trustee”), by and through her counsel of record, Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd., hereby submits the *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* (the “Objection”).

The Objection is based on the following Memorandum of Points and Authorities and the *Declaration of Shelley D. Krohn In Support of Trustee’s First 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,*

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”.

1 728-1, 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-
2 1, 749-1, and 750-1, Based On Improper Assertion Of A Priority Claim by a Landlord For a
3 Security Deposit (the “Trustee Declaration”), which is filed separately and concurrently with this
4 Court pursuant to Local Rule 9014(c)(2). The Objection is also based on the pleadings and papers
5 on file herein, and any argument that may be entertained at the hearing on the Objection.²

6 **In accordance with FRBP 3007(e)(1), the Trustee directs all claimants receiving this**
7 **objection to locate their names and claims in this objection.**

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **I. INTRODUCTION**

10 This Omnibus Objection relates to a series of proofs of claim that assert priority under
11 Section 507(a)(7) by landlords for security deposits. These proofs of claim are not entitled to
12 priority pursuant to 11 U.S.C. § 507(a)(7) as only tenants are allowed a priority claim for security
13 deposits. For this reason, the Trustee seeks an order finding that these proofs of claim are not
14 entitled to priority under Section 507(a)(7).

15 **II. JURISDICTION AND VENUE**

16 This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1134. This
17 is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue before this Court is appropriate
18 under 28 U.S.C. §§ 1408 and 1409. This matter constitutes a core proceeding under 28 U.S.C. §
19 157(b)(2). Pursuant to Local Rule 9014.2, if the Court determines that absent consent of the
20 parties the Court cannot enter final orders or judgment regarding the Objection consistent with
21 Article III of the United States Constitution, the Firm consents to entry of final orders and
22 judgment by this Court. The statutory basis for the relief sought herein are Section 502(b)(1) and
23 FRBP 3007.

24 ...

25 ...

26 _____
27 ² The Trustee also requests that the Court take judicial notice of all pleadings filed in the above-
28 referenced bankruptcy case, including adversary proceedings, pursuant to Federal Rule of
Evidence 201, incorporated by reference by FRBP 9017.

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III. CLAIMS OBJECTED TO IN THIS OMNIBUS OBJECTION

In accordance with FRBP 3007(e)(2) and (3) the following proofs of claim are objected to herein:

Claimant	Proof of Claim No.	Grounds for objection ³
Bao, Jing Ping	648-1	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. 31-32.
Casteneda, Alice	741-1	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. 31-32.
Chan, Raymond	685-1	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. 31-32.
Chan, Raymond	696-1	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. 31-32.
Chan, Raymond	697-1	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. 31-32.
Chan, Raymond	698-1	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. 31-32.
Chan, Raymond	699-1	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. 31-32.

³ Unless otherwise stated, page references are to the page within this motion stating the legal argument for the objection.

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1	Chen, Chao Hung and	687-1	Claim improperly asserts priority under 11
2	Koon Meei Chew		U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Chen, Guang	55-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Chen, Han and Xiao	679-1	Claim improperly asserts priority under 11
8	Mei Michelle Liu		U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Chen, Han and Xiao	680-1	Claim improperly asserts priority under 11
11	Mei Michelle Liu		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Chen, Han and Xiao	689-1	Claim improperly asserts priority under 11
14	Mei Michelle Liu		U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Chen, Han and Xiao	690-1	Claim improperly asserts priority under 11
17	Mei Michelle Liu		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Chen, Han and Xiao	691-1	Claim improperly asserts priority under 11
20	Mei Michelle Liu		U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Chen, Min	693-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Fang, Jing	649-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
28			

1	Fang, Lorraine	686-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Hsia, Hsiao Fan and	706-1	Claim improperly asserts priority under 11
5	Dien Shen Hsia Peng		U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Hsieh, Michelle and Lei	726-1	Claim improperly asserts priority under 11
8	Yang		U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Hu, Yimei	692-1	Claim improperly asserts priority under 11
11			U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Hua's Industry, LLC	707-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Hua's Industry, LLC	721-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Huang, Paul W.	646-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Huo, Feng and Yu	629-1	Claim improperly asserts priority under 11
23	Zheng		U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Huang, Wenbo	653-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
28			

1	Kim, Caecilia J.	632-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Kim, Caecilia J.	634-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Kun, Shi	720-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Kwan, Kin and Sandy	643-1	Claim improperly asserts priority under 11
11	Lui		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Lee, Siu Hang and	702-1	Claim improperly asserts priority under 11
14	Eleanor Waikam Lee		U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Lee, Wai and Yu Chun	642-1	Claim improperly asserts priority under 11
17	Lee		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Leong, Leng Leng	674-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Li, Chun Fu	641-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Li, Fanny	716-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
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1	Li, Wang Yang	742-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Li, Xiaorong	747-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Liang, Jin	711-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Lin, Ho Mu	636-1	Claim improperly asserts priority under 11
11			U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Liu, Feng	746-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Liu, Ning and	670-1	Claim improperly asserts priority under 11
17	Yingchun Wu		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Long Capture	748-1	Claim improperly asserts priority under 11
20	Holdings, LLC		U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Long Capture	749-1	Claim improperly asserts priority under 11
23	Holdings, LLC		U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Long Capture	750-1	Claim improperly asserts priority under 11
26	Holdings, LLC		U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
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1	Louie, Alvin	57-2	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Louie, Victor H.	658-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Lu, Yong Qin	657-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Luu, Michael D. and	631-1	Claim improperly asserts priority under 11
11	Kimtrung Thi To		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Luu, Muoi	725-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	LV830, LLC	695-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Ma, Kwai C.	705-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Ma, Kwan Wood and	637-1	Claim improperly asserts priority under 11
23	Connie Huo Si Ma		U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Ma, Kwan Wood and	638-1	Claim improperly asserts priority under 11
26	Connie Huo Si Ma		U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
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1	Ma, Kwan Wood and	640-1	Claim improperly asserts priority under 11
2	Connie Huo Si Ma		U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Ma, Yutao	654-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Ma, Yutao	655-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Ma, Yutao	656-1	Claim improperly asserts priority under 11
11			U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Ming, Yeung So and	710-1	Claim improperly asserts priority under 11
14	Cheng Tiao Shing		U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Ming, Yeung So and	712-1	Claim improperly asserts priority under 11
17	Cheng Tiao Shing		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Morning Horizon, LLC	662-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Ngo, Chi Keong	633-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Ngo, Tina Thuyla	728-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
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1	Nguyen, Jimmy	639-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Nguyen, Phung Kim	700-1	Claim improperly asserts priority under 11
5	and Kiet Tran		U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Nguyen, Phung Kim	701-1	Claim improperly asserts priority under 11
8	and Kiet Tran		U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Nguyen, Phung Kim	713-1	Claim improperly asserts priority under 11
11	and Kiet Tran		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Ou, Shi Chi and Mei	703-1	Claim improperly asserts priority under 11
14	Huan Yu		U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Peng, Dien Shen Hsia	727-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Poon, Phillip	676-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Sha, Jimmy	718-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Sha, Jimmy	719-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
28			

1	Wang, Depei	663-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Wang, Qian	665-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Wong, Yuk S. and Xiao	682-1	Claim improperly asserts priority under 11
8	Y Zhu		U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Wong, Yuk S. and Xiao	684-1	Claim improperly asserts priority under 11
11	Y Zhu		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Wu, Ping C.	715-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Wu, Yao Hwa	644-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Wu, Yu Ding	723-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Wu, Yu Ding	724-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Yan, Zhong Chun	743-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
28			

1	Yan, Zhong Chun	744-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Yang, Michael and Thi	635-1	Claim improperly asserts priority under 11
5	Le Tang		U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Yang, Yu Shen	688-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Yee, Kim S. and Cai	630-1	Claim improperly asserts priority under 11
11	Fen		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Yu, Christina	647-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Zhang, Ya Qing	708-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Zhang, Ya Qing	729-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.
22	Zhang, Ya Qing	730-1	Claim improperly asserts priority under 11
23			U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 31-32.
25	Zhang, Ya Qing	731-1	Claim improperly asserts priority under 11
26			U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 31-32.
28			

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1	Zhang, Ya Qing	732-1	Claim improperly asserts priority under 11
2			U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 31-32.
4	Zhang, Ya Qing	737-1	Claim improperly asserts priority under 11
5			U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 31-32.
7	Zhang, Ying	709-1	Claim improperly asserts priority under 11
8			U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 31-32.
10	Zhao, Wei	664-1	Claim improperly asserts priority under 11
11			U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 31-32.
13	Zhou, Man Ping	745-1	Claim improperly asserts priority under 11
14			U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 31-32.
16	Zhu, Huili	650-1	Claim improperly asserts priority under 11
17			U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 31-32.
19	Zhu, Huili	651-1	Claim improperly asserts priority under 11
20			U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 31-32.

IV. STATEMENT OF FACTS

1. 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]⁴. *See* Trustee Declaration.

⁴ 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.

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

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

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

9 5. On February 27, 2015, the Court entered an *Order Granting Application for Order*
10 *Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No.
11 128]. *See* Trustee Declaration.

12 6. Since its employment, Garden City Group (“GCG”) has been maintaining the
13 Proofs of Claim that have been submitted by creditors. *See* Trustee Declaration.

14 7. On January 13, 2018, Trustee Nelson died. *See* Trustee Declaration.

15 8. On January 19, 2018, the Trustee was appointed as the successor Chapter 7 Trustee
16 in the Debtor’s bankruptcy case. *See* Trustee Declaration.

17 9. On May 11, 2015, Feng Huo and Yu Zheng filed a claim claiming priority under
18 11 U.S.C. § 507(a)(7) in the amount of \$2,370.00 based on deposit toward purchase, lease or
19 rental of property. A true and correct copy of Claim 629-1 is attached to the Trustee Declaration
20 as **Exhibit “1”**.

21 10. On May 11, 2015, Kim S. Yee and Cai Fen filed a claim claiming priority under 11
22 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental
23 of property. A true and correct copy of Claim 630-1 is attached to the Trustee Declaration as
24 **Exhibit “2”**.

25 11. On May 11, 2015, Michael D. Luu and Kimtrung Thi To filed a claim claiming
26 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,450.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 631-1 is attached to the
28 Trustee Declaration as **Exhibit “3”**.

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1 12. On May 11, 2015, Caecilia J. Kim filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 632-1 is attached to the Trustee Declaration as **Exhibit**
4 **“4”**.

5 13. On May 11, 2015, Chi Keong Ngo filed a claim claiming priority under 11 U.S.C.
6 § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 633-1 is attached to the Trustee Declaration as **Exhibit**
8 **“5”**.

9 14. On May 11, 2015, Caecilia J. Kim filed a claim claiming priority under 11 U.S.C.
10 § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 634-1 is attached to the Trustee Declaration as **Exhibit**
12 **“6”**.

13 15. On May 11, 2015, Michael Yang and Thi Le Tang filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 635-1 is attached to the Trustee
16 Declaration as **Exhibit “7”**.

17 16. On May 11, 2015, Ho Mu Lin filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 636-1 is attached to the Trustee Declaration as **Exhibit**
20 **“8”**.

21 17. On May 11, 2015, Kwan Wood Ma and Connie Huo Si Ma filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,890.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 637-1 is attached to the
24 Trustee Declaration as **Exhibit “9”**.

25 18. On May 11, 2015, Kwan Wood Ma and Connie Huo Si Ma filed a claim claiming
26 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,575.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 638-1 is attached to the
28 Trustee Declaration as **Exhibit “10”**.

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- 1 19. On May 11, 2015, Jimmy Nguyen filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$1,330.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 639-1 is attached to the Trustee Declaration as **Exhibit**
4 **“11”**.
- 5 20. On May 11, 2015, Kwan Wood Ma and Connie Huo Si Ma filed a claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward
7 purchase, lease or rental of property. A true and correct copy of Claim 640-1 is attached to the
8 Trustee Declaration as **Exhibit “12”**.
- 9 21. On May 11, 2015, ChunFu Li filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$2,500.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 641-1 is attached to the Trustee Declaration as **Exhibit**
12 **“13”**.
- 13 22. On May 11, 2015, Wai Lee and Yu Chun Lee filed a claim claiming priority under
14 11 U.S.C. § 507(a)(7) in the amount of \$1,380.00 based on deposit toward purchase, lease or
15 rental of property. A true and correct copy of Claim 642-1 is attached to the Trustee Declaration
16 as **Exhibit “14”**.
- 17 23. On May 11, 2015, Kin Kwan and Sandy Lui filed a claim claiming priority under
18 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or
19 rental of property. A true and correct copy of Claim 643-1 is attached to the Trustee Declaration
20 as **Exhibit “15”**.
- 21 24. On May 11, 2015, Yao Hwa Wu filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 644-1 is attached to the Trustee Declaration as **Exhibit**
24 **“16”**.
- 25 25. On May 11, 2015, Paul W. Huang filed a claim claiming priority under 11 U.S.C.
26 § 507(a)(7) in the amount of \$1,642.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 646-1 is attached to the Trustee Declaration as **Exhibit**
28 **“17”**.

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- 1 26. On May 11, 2015, Christina Yu filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$2,052.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 647-1 is attached to the Trustee Declaration as **Exhibit**
4 **“18”**.
- 5 27. On May 11, 2015, Jing Ping Bao filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 648-1 is attached to the Trustee Declaration as **Exhibit**
8 **“19”**.
- 9 28. On May 11, 2015, Jing Fang filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$2,496.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 649-1 is attached to the Trustee Declaration as **Exhibit**
12 **“20”**.
- 13 29. On May 11, 2015, Huili Zhu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,632.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 650-1 is attached to the Trustee Declaration as **Exhibit**
16 **“21”**.
- 17 30. On May 11, 2015, Huili Zhu filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 651-1 is attached to the Trustee Declaration as **Exhibit**
20 **“22”**.
- 21 31. On May 11, 2015, Wenbo Huang filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 653-1 is attached to the Trustee Declaration as **Exhibit**
24 **“23”**.
- 25 32. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 654-1 is attached to the Trustee Declaration as **Exhibit**
28 **“24”**.

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- 1 33. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 655-1 is attached to the Trustee Declaration as **Exhibit**
4 **“25”**.
- 5 34. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 656-1 is attached to the Trustee Declaration as **Exhibit**
8 **“26”**.
- 9 35. On May 11, 2015, Yong Qin Lu filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 657-1 is attached to the Trustee Declaration as **Exhibit**
12 **“27”**.
- 13 36. On May 7, 2015, Alvin Louie filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,695.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 57-2 is attached to the Trustee Declaration as **Exhibit**
16 **“28”**.
- 17 37. On May 4, 2015, Guang Chen filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 55-1 is attached to the Trustee Declaration as **Exhibit**
20 **“29”**.
- 21 38. On May 12, 2015, Victor H. Louie filed a claim claiming priority under 11 U.S.C.
22 § 507(a)(7) in the amount of \$5,780.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 658-1 is attached to the Trustee Declaration as **Exhibit**
24 **“30”**.
- 25 39. On May 12, 2015, Morning Horizon, LLC filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$1,795.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 662-1 is attached to the Trustee Declaration as
28 **Exhibit “31”**.

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- 1 40. On May 12, 2015, Depei Wang filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$2,209.75 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 663-1 is attached to the Trustee Declaration as **Exhibit**
4 **“32”**.
- 5 41. On May 12, 2015, Wei Zhao filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 664-1 is attached to the Trustee Declaration as **Exhibit**
8 **“33”**.
- 9 42. On May 12, 2015, Qian Wang filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 665-1 is attached to the Trustee Declaration as **Exhibit**
12 **“34”**.
- 13 43. On May 12, 2015, Ning Liu and Yingchun Wu filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,245.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 670-1 is attached to the Trustee
16 Declaration as **Exhibit “35”**.
- 17 44. On May 12, 2015, Leng Leng Leong filed a claim claiming priority under 11
18 U.S.C. § 507(a)(7) in the amount of \$845.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 674-1 is attached to the Trustee Declaration as **Exhibit**
20 **“36”**.
- 21 45. On May 12, 2015, Phillip Poon filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,080.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 676-1 is attached to the Trustee Declaration as **Exhibit**
24 **“37”**.
- 25 46. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
26 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 679-1 is attached to the
28 Trustee Declaration as **Exhibit “38”**.

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- 1 47. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,625.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 680-1 is attached to the
4 Trustee Declaration as **Exhibit “39”**.
- 5 48. On May 12, 2015, Yuk S. Wong and Xiao Y Zhu filed a claim claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$2,650.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 682-1 is attached to the Trustee
8 Declaration as **Exhibit “40”**.
- 9 49. On May 12, 2015, Yuk S. Wong and Xiao Y Zhu filed a claim claiming priority
10 under 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease
11 or rental of property. A true and correct copy of Claim 684-1 is attached to the Trustee
12 Declaration as **Exhibit “41”**.
- 13 50. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
14 § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 685-1 is attached to the Trustee Declaration as **Exhibit**
16 **“42”**.
- 17 51. On May 12, 2015, Lorraine Fang filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,295.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 686-1 is attached to the Trustee Declaration as **Exhibit**
20 **“43”**.
- 21 52. On May 12, 2015, Chao Hung Chen and Koon Meei Chew filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,190.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 687-1 is attached to the
24 Trustee Declaration as **Exhibit “44”**.
- 25 53. On May 12, 2015, Yu Shen Yang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 688-1 is attached to the Trustee Declaration as **Exhibit**
28 **“45”**.

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- 1 54. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 689-1 is attached to the
4 Trustee Declaration as **Exhibit “46”**.
- 5 55. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward
7 purchase, lease or rental of property. A true and correct copy of Claim 690-1 is attached to the
8 Trustee Declaration as **Exhibit “47”**.
- 9 56. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
10 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward
11 purchase, lease or rental of property. A true and correct copy of Claim 691-1 is attached to the
12 Trustee Declaration as **Exhibit “48”**.
- 13 57. On May 12, 2015, Yimei Hu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 692-1 is attached to the Trustee Declaration as **Exhibit**
16 **“49”**.
- 17 58. On May 12, 2015, Min Chen filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 693-1 is attached to the Trustee Declaration as **Exhibit**
20 **“50”**.
- 21 59. On May 12, 2015, LV830, LLC filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$552.00 based on deposit toward purchase, lease or rental of property.
23 A true and correct copy of Claim 695-1 is attached to the Trustee Declaration as **Exhibit “51”**.
- 24 60. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
25 § 507(a)(7) in the amount of \$325.00 based on deposit toward purchase, lease or rental of
26 property. A true and correct copy of Claim 696-1 is attached to the Trustee Declaration as **Exhibit**
27 **“52”**.
- 28 ...

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1 61. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$325.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 697-1 is attached to the Trustee Declaration as **Exhibit**
4 **“53”**.

5 62. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
6 § 507(a)(7) in the amount of \$425.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 698-1 is attached to the Trustee Declaration as **Exhibit**
8 **“54”**.

9 63. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
10 § 507(a)(7) in the amount of \$725.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 699-1 is attached to the Trustee Declaration as **Exhibit**
12 **“55”**.

13 64. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
14 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward
15 purchase, lease or rental of property. A true and correct copy of Claim 700-1 is attached to the
16 Trustee Declaration as **Exhibit “56”**.

17 65. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
18 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward
19 purchase, lease or rental of property. A true and correct copy of Claim 701-1 is attached to the
20 Trustee Declaration as **Exhibit “57”**.

21 66. On May 12, 2015, Siu Hang Lee and Eleanor Waikam Lee filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,700.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 702-1 is attached to the
24 Trustee Declaration as **Exhibit “58”**.

25 67. On May 12, 2015, Shi Chi Ou and Mei Huan Yu filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,525.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 703-1 is attached to the Trustee
28 Declaration as **Exhibit “59”**.

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1 68. On May 12, 2015, Kwai C. Ma filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$2,125.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 705-1 is attached to the Trustee Declaration as **Exhibit**
4 **“60”**.

5 69. On May 12, 2015, Hsiao Fan Hsia and Dien Shen Hsia Peng filed a claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,950.00 based on deposit toward
7 purchase, lease or rental of property. A true and correct copy of Claim 706-1 is attached to the
8 Trustee Declaration as **Exhibit “61”**.

9 70. On May 12, 2015, Hua’s Industry, LLC filed a claim claiming priority under 11
10 U.S.C. § 507(a)(7) in the amount of \$1,775.00 based on deposit toward purchase, lease or rental
11 of property. A true and correct copy of Claim 707-1 is attached to the Trustee Declaration as
12 **Exhibit “62”**.

13 71. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
14 § 507(a)(7) in the amount of \$6,400.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 708-1 is attached to the Trustee Declaration as **Exhibit**
16 **“63”**.

17 72. On May 12, 2015, Ying Zhang filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$1,975.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 709-1 is attached to the Trustee Declaration as **Exhibit**
20 **“64”**.

21 73. On May 12, 2015, Yeung So Ming and Cheng Tiao Shing filed a claim claiming
22 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,875.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 710-1 is attached to the
24 Trustee Declaration as **Exhibit “65”**.

25 74. On May 12, 2015, Jin Liang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 711-1 is attached to the Trustee Declaration as **Exhibit**
28 **“66”**.

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- 1 75. On May 12, 2015, Yeung So Ming and Cheng Tiao Shing filed a claim claiming
2 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,700.00 based on deposit toward
3 purchase, lease or rental of property. A true and correct copy of Claim 712-1 is attached to the
4 Trustee Declaration as **Exhibit “67”**.
- 5 76. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
6 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward
7 purchase, lease or rental of property. A true and correct copy of Claim 713-1 is attached to the
8 Trustee Declaration as **Exhibit “68”**.
- 9 77. On May 12, 2015, Ping C. Wu filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$750.00 based on deposit toward purchase, lease or rental of property.
11 A true and correct copy of Claim 715-1 is attached to the Trustee Declaration as **Exhibit “69”**.
- 12 78. On May 12, 2015, Fanny Li filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
14 property. A true and correct copy of Claim 716-1 is attached to the Trustee Declaration as **Exhibit**
15 **“70”**.
- 16 79. On May 12, 2015, Jimmy Sha filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,645.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 718-1 is attached to the Trustee Declaration as **Exhibit**
19 **“71”**.
- 20 80. On May 12, 2015, Jimmy Sha filed a claim claiming priority under 11 U.S.C. §
21 507(a)(7) in the amount of \$1,150.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 719-1 is attached to the Trustee Declaration as **Exhibit**
23 **“72”**.
- 24 81. On May 12, 2015, Shi Kun filed a claim claiming priority under 11 U.S.C. §
25 507(a)(7) in the amount of \$1,625.00 based on deposit toward purchase, lease or rental of
26 property. A true and correct copy of Claim 720-1 is attached to the Trustee Declaration as **Exhibit**
27 **“73”**.
- 28 ...

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1 82. On May 12, 2015, Hua’s Industry, LLC filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$3075.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 721-1 is attached to the Trustee Declaration as **Exhibit**
4 **“74”**.

5 83. On May 12, 2015, Yu Ding Wu filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,725.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 723-1 is attached to the Trustee Declaration as **Exhibit**
8 **“75”**.

9 84. On May 12, 2015, Yu Ding Wu filed a claim claiming priority under 11 U.S.C. §
10 507(a)(7) in the amount of \$1,725.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 724-1 is attached to the Trustee Declaration as **Exhibit**
12 **“76”**.

13 85. On May 12, 2015, Muoi Luu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,375.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 725-1 is attached to the Trustee Declaration as **Exhibit**
16 **“77”**.

17 86. On May 12, 2015, Michelle Hsieh and Lei Yang filed a claim claiming priority
18 under 11 U.S.C. § 507(a)(7) in the amount of \$1,570.00 based on deposit toward purchase, lease
19 or rental of property. A true and correct copy of Claim 726-1 is attached to the Trustee
20 Declaration as **Exhibit “78”**.

21 87. On May 12, 2015, Dien Shen Hsia Peng filed a claim claiming priority under 11
22 U.S.C. § 507(a)(7) in the amount of \$1,425.00 based on deposit toward purchase, lease or rental
23 of property. A true and correct copy of Claim 727-1 is attached to the Trustee Declaration as
24 **Exhibit “79”**.

25 88. On May 12, 2015, Tina Thuyla Ngo filed a claim claiming priority under 11
26 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease or rental
27 of property. A true and correct copy of Claim 728-1 is attached to the Trustee Declaration as
28 **Exhibit “80”**.

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- 1 89. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
2 § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 729-1 is attached to the Trustee Declaration as **Exhibit**
4 **“81”**.
- 5 90. On May 12, 2015, Ya Qing Zhang 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 730-1 is attached to the Trustee Declaration as **Exhibit**
8 **“82”**.
- 9 91. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
10 § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 731-1 is attached to the Trustee Declaration as **Exhibit**
12 **“83”**.
- 13 92. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
14 § 507(a)(7) in the amount of \$1,575.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 732-1 is attached to the Trustee Declaration as **Exhibit**
16 **“84”**.
- 17 93. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
18 § 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 737-1 is attached to the Trustee Declaration as **Exhibit**
20 **“85”**.
- 21 94. On May 13, 2015, Alice Casteneda filed a claim claiming priority under 11 U.S.C.
22 § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 741-1 is attached to the Trustee Declaration as **Exhibit**
24 **“86”**.
- 25 95. On May 13, 2015, Wang Yang Li filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 742-1 is attached to the Trustee Declaration as **Exhibit**
28 **“87”**.

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1 96. On May 13, 2015, Zhong Chun Yan filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental
3 of property. A true and correct copy of Claim 743-1 is attached to the Trustee Declaration as
4 **Exhibit “88”**.

5 97. On May 13, 2015, Zhong Chun Yan filed a claim claiming priority under 11
6 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental
7 of property. A true and correct copy of Claim 744-1 is attached to the Trustee Declaration as
8 **Exhibit “89”**.

9 98. On May 13, 2015, Man Ping Zhou filed a claim claiming priority under 11 U.S.C.
10 § 507(a)(7) in the amount of \$1,075.00 based on deposit toward purchase, lease or rental of
11 property. A true and correct copy of Claim 745-1 is attached to the Trustee Declaration as **Exhibit**
12 **“90”**.

13 99. On May 13, 2015, Feng Liu filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,605.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 746-1 is attached to the Trustee Declaration as **Exhibit**
16 **“91”**.

17 100. On May 13, 2015, Xiaorong Li filed a claim claiming priority under 11 U.S.C. §
18 507(a)(7) in the amount of \$775.00 based on deposit toward purchase, lease or rental of property.
19 A true and correct copy of Claim 747-1 is attached to the Trustee Declaration as **Exhibit “92”**.

20 101. On May 13, 2015, Long Capture Holdings, LLC filed a claim claiming priority
21 under 11 U.S.C. § 507(a)(7) in the amount of \$550.00 based on deposit toward purchase, lease or
22 rental of property. A true and correct copy of Claim 748-1 is attached to the Trustee Declaration
23 as **Exhibit “93”**.

24 102. On May 13, 2015, Long Capture Holdings, LLC filed a claim claiming priority
25 under 11 U.S.C. § 507(a)(7) in the amount of \$900.00 based on deposit toward purchase, lease or
26 rental of property. A true and correct copy of Claim 749-1 is attached to the Trustee Declaration
27 as **Exhibit “94”**.

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themselves. But **the ultimate burden of persuasion is always on the claimant**. Thus, it may be said that the proof of claim is some evidence as to its validity and amount.

Wright v. Holm (In re Holm), 931 F.2d 620, 623 (9th Cir. 1991) (quoting 3 L. King, COLLIER ON BANKRUPTCY § 502.02, at 502-22 (15th ed. 1991)) (emphasis removed) (emphasis added); *see also Lundell v. Anchor Constr. Specialists, Inc.*, 223 F.3d 1035, 1040 (9th Cir. 2000) (holding that the bankruptcy court correctly understood that the ultimate burden of persuasion was on the creditor); *Spencer v. Pugh (In re Pugh)*, 157 B.R. 898, 901 (B.A.P. 9th Cir. 1993) (holding claimant bears ultimate burden of persuasion as to validity and amount of the claim by a preponderance of the evidence). Accordingly, to be entitled to prima facie validity of a claim, a proof of claim must set forth all necessary facts to establish the claim. *Wright*, 931 F.2d at 623. Furthermore, the ultimate burden is always on the claimant, and a claim must be denied if the claimant cannot carry this burden after an objection showing facts tending to defeat the claim. *Id.* If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence. *See Lundell*, 223 F.3d at 1039 (citations omitted).

In accordance with Section 502(b), the validity and amount of the claim shall be determined as of the date of the filing of the bankruptcy petition. Section 502(b)(1) requires disallowance of a claim if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured . . .” 11 U.S.C. § 502(b)(1). The “applicable law” referenced in Section 502(b)(1) includes bankruptcy law as well as other federal and state laws. A trustee is therefore allowed to raise any federal or state law defenses to a claim. *See In re G.I. Indus., Inc.*, 204 F.3d 1276, 1281 (9th Cir. 2000) (stating that a claim cannot be allowed under Section 502(b)(1) if it is unenforceable under nonbankruptcy law); *Johnson v. Righetti*, 756 F.2d 738, 741 (9th Cir. 1985) (finding that the validity of the claim may be determined under state law); *In re Eastview Estates II*, 713 F.2d 443, 447 (9th Cir. 1983) (applying California law).

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1 **B. The Claims in Question Are Not Entitled to Priority Under Section 507(a)(7)**

2 Section 507(a)(7) states:

3 (a) The following expenses and claims have priority in the following
4 order:

5 *****

6 (7) Seventh, allowed unsecured claims of individuals, to
7 the extent of \$2,850 for each such individual, arising
8 from the deposit, before the commencement of the
9 case, of money in connection with the purchase, lease,
10 or rental of property, or the purchase of services, for the
11 personal, family, or household use of such individuals,
12 that were not delivered or provided.

13 Case law establishes that tenants are entitled to seventh level priority. The Code provides
14 a seventh priority for allowed, unsecured claims of individuals who deposited money with
15 the debtor prepetition and in connection with the purchase, lease, or rental of property, or the
16 purchase of services, for the personal, family, or household use of such an individual where the
17 debtor failed to deliver such property or services. This priority is limited to the extent of \$2,775
18 for each such individual and has been referred to as the “consumer priority.”

19 Courts have interpreted “individual” in its ordinary sense: An individual means “one
20 natural person” and does not include business entities such as corporations or partnerships. *See In*
21 *re James R. Corbitt Co.*, 48 B.R. 937, 939 (Bankr. E.D. Va. 1985); *In re Carolina Sales Corp.*,
22 43 B.R. 596, 597 (Bankr. E.D.N.C. 1984). A residential tenant who pays a security deposit is
23 entitled to a §507(a)(7) priority claim in the landlord's bankruptcy case. *See Guarracino v.*
24 *Hoffman*, 246 B.R. 130, 134 (D. Mass. 2000)(“Given that non-commercial tenant security
25 deposits are within the scope of the statute and legislative history evidences Congress’ intent to
26 protect a consumer's money held in trust, it follows that the \$1300 security deposit should be
27 given administrative priority.”); *In re River Vill. Assocs.*, 161 B.R. 127, 133-34 (Bankr. E.D. Pa.
28 1993) aff'd, 181 B.R. 795 (E.D. Pa. 1995) (holding that each tenant’s claim for security deposits
is entitled to priority in landlord’s Chapter 11 case); *In re Wise*, 120 B.R. 537, 545-47 (Bankr. D.

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1 Alaska 1990) (contractual assignee of tenant security deposits was entitled to assert consumer
2 deposit priority).

3 The Court in *Guarracino* held that Section 507(6) allowing sixth-level (now Section
4 507(a)(7) allowing seventh-level) priority to unsecured claims for the recovery of sums deposited
5 with debtor in connection with the purchase, lease or rental of property was enacted to
6 protect unsuspecting individuals who deposit money into what is tantamount to a trust fund.
7 In the instant case, it is the individual tenants who deposited the money, not the landlords.
8 Therefore, the tenants, and only the tenants, are entitled to a priority claim.

9 Here, each of the claims objected to was filed by a landlord, asserting a priority claim
10 under 11 U.S.C. § 507(a)(7). The deposits in question were not for the purchase, lease, or rental of
11 property for the personal, family, or household of those asserting the claim. Accordingly, these
12 claims should be reclassified as general unsecured claims.

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VI. CONCLUSION

For the foregoing reasons, the Trustee respectfully requests that the Court enter an order:
(i) sustaining the Objections to 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, and reclassify these claims as general unsecured claims; and (ii) for such other and further relief as is just and proper.

Dated this 24th day of July, 2020.

HOUAMAND LAW FIRM, LTD.

By: */s/ Bradley G. Sims, Esq.*
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