

Electronically Filed On: July 24, 2020

Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@houmandlaw.com
Bradley G. Sims, Esq. (NV Bar No. 11713)
Email: bsims@houmandlaw.com
HOUMAND LAW FIRM, LTD.
9205 West Russell Road, Building 3, Suite 240
Las Vegas, NV 89148
Telephone: 702/720-3370
Facsimile: 702/720-3371

Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

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

**DECLARATION OF SHELLEY D.
KROHN IN SUPPORT OF TRUSTEE'S
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

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

300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker ¹

I, Shelley D. Krohn, declare as follows:

1. I am over the age of 18 years and I am competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those facts stated on information and belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I could and would testify as to the matters set forth below based upon my personal knowledge.

2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

3. I make this declaration to support the *Trustee's 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").²

...

...

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of Bankruptcy Procedure will be referred to as "FRBP." The Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as the "Local Rules".

² Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to them in the Objection.

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

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

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

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

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

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

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

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

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

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

³ All references to "ECF No." are to the numbers assigned to the documents filed in the case as they appear on the docket maintained by the clerk of the court.

1 *U.S.C. § 542 and (2) Authority to Administer Security Deposits Through the Debtor's Bankruptcy*
 2 *Estate Pursuant to 11 U.S.C. § 105(a)* [ECF No. 196] (the "Turnover Order").

3 14. The Turnover Order provided that the security deposits held in the IOLTA
 4 Account of counsel for the Debtor would be transferred to the Debtor's bankruptcy estate and
 5 administered pursuant to Section 726.

6 15. On January 13, 2018, Trustee Nelson died.

7 16. On January 19, 2018, I was appointed as the successor Chapter 7 Trustee in the
 8 Debtor's bankruptcy case.

9 17. On May 11, 2015, Feng Huo and Yu Zheng filed a claim claiming priority under
 10 11 U.S.C. § 507(a)(7) in the amount of \$2,370.00 based on deposit toward purchase, lease or
 11 rental of property. A true and correct copy of Claim 629-1 is attached hereto as **Exhibit "1"**.

12 18. On May 11, 2015, Kim S. Yee and Cai Fen filed a claim claiming priority under 11
 13 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental
 14 of property. A true and correct copy of Claim 630-1 is attached hereto as **Exhibit "2"**.

15 19. On May 11, 2015, Michael D. Luu and Kimtrung Thi To filed a claim claiming
 16 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,450.00 based on deposit toward
 17 purchase, lease or rental of property. A true and correct copy of Claim 631-1 is attached hereto as
 18 **Exhibit "3"**.

19 20. On May 11, 2015, Caecilia J. Kim filed a claim claiming priority under 11 U.S.C.
 20 § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
 21 property. A true and correct copy of Claim 632-1 is attached hereto as **Exhibit "4"**.

22 21. On May 11, 2015, Chi Keong Ngo filed a claim claiming priority under 11 U.S.C.
 23 § 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
 24 property. A true and correct copy of Claim 633-1 is attached hereto as **Exhibit "5"**.

25 22. On May 11, 2015, Caecilia J. Kim filed a claim claiming priority under 11 U.S.C.
 26 § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
 27 property. A true and correct copy of Claim 634-1 is attached hereto as **Exhibit "6"**.

28 . . .

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

4 24. On May 11, 2015, Ho Mu Lin filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 636-1 is attached hereto as **Exhibit “8”**.

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

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

15 27. On May 11, 2015, Jimmy Nguyen filed a claim claiming priority under 11 U.S.C.
16 § 507(a)(7) in the amount of \$1,330.00 based on deposit toward purchase, lease or rental of
17 property. A true and correct copy of Claim 639-1 is attached hereto as **Exhibit “11”**.

18 28. On May 11, 2015, Kwan Wood Ma and Connie Huo Si Ma filed a claim claiming
19 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward
20 purchase, lease or rental of property. A true and correct copy of Claim 640-1 is attached hereto as
21 **Exhibit “12”**.

22 29. On May 11, 2015, ChunFu Li filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$2,500.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 641-1 is attached hereto as **Exhibit “13”**.

25 30. On May 11, 2015, Wai Lee and Yu Chun Lee filed a claim claiming priority under
26 11 U.S.C. § 507(a)(7) in the amount of \$1,380.00 based on deposit toward purchase, lease or
27 rental of property. A true and correct copy of Claim 642-1 is attached hereto as **Exhibit “14”**.

28 ...

1 31. On May 11, 2015, Kin Kwan and Sandy Lui filed a claim claiming priority under
2 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or
3 rental of property. A true and correct copy of Claim 643-1 is attached hereto as **Exhibit "15"**.

4 32. On May 11, 2015, Yao Hwa Wu filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 644-1 is attached hereto as **Exhibit "16"**.

7 33. On May 11, 2015, Paul W. Huang filed a claim claiming priority under 11 U.S.C.
8 § 507(a)(7) in the amount of \$1,642.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 646-1 is attached hereto as **Exhibit "17"**.

10 34. On May 11, 2015, Christina Yu filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$2,052.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 647-1 is attached hereto as **Exhibit "18"**.

13 35. On May 11, 2015, Jing Ping Bao filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 648-1 is attached hereto as **Exhibit "19"**.

16 36. On May 11, 2015, Jing Fang filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$2,496.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 649-1 is attached hereto as **Exhibit "20"**.

19 37. On May 11, 2015, Huili Zhu filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$1,632.00 based on deposit toward purchase, lease or rental of
21 property. A true and correct copy of Claim 650-1 is attached hereto as **Exhibit "21"**.

22 38. On May 11, 2015, Huili Zhu filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 651-1 is attached hereto as **Exhibit "22"**.

25 39. On May 11, 2015, Wenbo Huang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 653-1 is attached hereto as **Exhibit "23"**.

28 ...

1 40. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 654-1 is attached hereto as **Exhibit "24"**.

4 41. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 655-1 is attached hereto as **Exhibit "25"**.

7 42. On May 11, 2015, Yutao Ma filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 656-1 is attached hereto as **Exhibit "26"**.

10 43. On May 11, 2015, Yong Qin Lu filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 657-1 is attached hereto as **Exhibit "27"**.

13 44. 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 hereto as **Exhibit "28"**.

16 45. On May 4, 2015, Guang Chen filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 55-1 is attached hereto as **Exhibit "29"**.

19 46. On May 12, 2015, Victor H. Louie filed a claim claiming priority under 11 U.S.C.
20 § 507(a)(7) in the amount of \$5,780.00 based on deposit toward purchase, lease or rental of
21 property. A true and correct copy of Claim 658-1 is attached hereto as **Exhibit "30"**.

22 47. On May 12, 2015, Morning Horizon, LLC filed a claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$1,795.00 based on deposit toward purchase, lease or rental
24 of property. A true and correct copy of Claim 662-1 is attached hereto as **Exhibit "31"**.

25 48. On May 12, 2015, Depei Wang filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$2,209.75 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 663-1 is attached hereto as **Exhibit "32"**.

28 ...

1 49. On May 12, 2015, Wei Zhao filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 664-1 is attached hereto as **Exhibit "33"**.

4 50. On May 12, 2015, Qian Wang filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 665-1 is attached hereto as **Exhibit "34"**.

7 51. On May 12, 2015, Ning Liu and Yingchun Wu filed a claim claiming priority
8 under 11 U.S.C. § 507(a)(7) in the amount of \$1,245.00 based on deposit toward purchase, lease
9 or rental of property. A true and correct copy of Claim 670-1 is attached hereto as **Exhibit "35"**.

10 52. On May 12, 2015, Leng Leng Leong filed a claim claiming priority under 11
11 U.S.C. § 507(a)(7) in the amount of \$845.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 674-1 is attached hereto as **Exhibit "36"**.

13 53. On May 12, 2015, Phillip Poon filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,080.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 676-1 is attached hereto as **Exhibit "37"**.

16 54. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
17 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward
18 purchase, lease or rental of property. A true and correct copy of Claim 679-1 is attached hereto as
19 **Exhibit "38"**.

20 55. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
21 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,625.00 based on deposit toward
22 purchase, lease or rental of property. A true and correct copy of Claim 680-1 is attached hereto as
23 **Exhibit "39"**.

24 56. On May 12, 2015, Yuk S. Wong and Xiao Y Zhu filed a claim claiming priority
25 under 11 U.S.C. § 507(a)(7) in the amount of \$2,650.00 based on deposit toward purchase, lease
26 or rental of property. A true and correct copy of Claim 682-1 is attached hereto as **Exhibit "40"**.

27 57. On May 12, 2015, Yuk S. Wong and Xiao Y Zhu filed a claim claiming priority
28 under 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease

1 or rental of property. A true and correct copy of Claim 684-1 is attached hereto as **Exhibit "41"**.

2 58. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
3 § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
4 property. A true and correct copy of Claim 685-1 is attached hereto as **Exhibit "42"**.

5 59. On May 12, 2015, Lorraine Fang filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$1,295.00 based on deposit toward purchase, lease or rental of
7 property. A true and correct copy of Claim 686-1 is attached hereto as **Exhibit "43"**.

8 60. On May 12, 2015, Chao Hung Chen and Koon Meei Chew filed a claim claiming
9 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,190.00 based on deposit toward
10 purchase, lease or rental of property. A true and correct copy of Claim 687-1 is attached hereto as
11 **Exhibit "44"**.

12 61. On May 12, 2015, Yu Shen Yang filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$1,800.00 based on deposit toward purchase, lease or rental of
14 property. A true and correct copy of Claim 688-1 is attached hereto as **Exhibit "45"**.

15 62. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
16 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward
17 purchase, lease or rental of property. A true and correct copy of Claim 689-1 is attached hereto as
18 **Exhibit "46"**.

19 63. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
20 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward
21 purchase, lease or rental of property. A true and correct copy of Claim 690-1 is attached hereto as
22 **Exhibit "47"**.

23 64. On May 12, 2015, Han Chen and Xiao Mei Michelle Liu filed a claim claiming
24 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward
25 purchase, lease or rental of property. A true and correct copy of Claim 691-1 is attached hereto as
26 **Exhibit "48"**.

27 65. On May 12, 2015, Yimei Hu filed a claim claiming priority under 11 U.S.C. §
28 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of

1 property. A true and correct copy of Claim 692-1 is attached hereto as **Exhibit "49"**.

2 66. On May 12, 2015, Min Chen filed a claim claiming priority under 11 U.S.C. §
3 507(a)(7) in the amount of \$1,450.00 based on deposit toward purchase, lease or rental of
4 property. A true and correct copy of Claim 693-1 is attached hereto as **Exhibit "50"**.

5 67. On May 12, 2015, LV830, LLC filed a claim claiming priority under 11 U.S.C. §
6 507(a)(7) in the amount of \$552.00 based on deposit toward purchase, lease or rental of property.
7 A true and correct copy of Claim 695-1 is attached hereto as **Exhibit "51"**.

8 68. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
9 § 507(a)(7) in the amount of \$325.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 696-1 is attached hereto as **Exhibit "52"**.

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

14 70. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
15 § 507(a)(7) in the amount of \$425.00 based on deposit toward purchase, lease or rental of
16 property. A true and correct copy of Claim 698-1 is attached hereto as **Exhibit "54"**.

17 71. On May 12, 2015, Raymond Chan filed a claim claiming priority under 11 U.S.C.
18 § 507(a)(7) in the amount of \$725.00 based on deposit toward purchase, lease or rental of
19 property. A true and correct copy of Claim 699-1 is attached hereto as **Exhibit "55"**.

20 72. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
21 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward
22 purchase, lease or rental of property. A true and correct copy of Claim 700-1 is attached hereto as
23 **Exhibit "56"**.

24 73. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
25 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,800.00 based on deposit toward
26 purchase, lease or rental of property. A true and correct copy of Claim 701-1 is attached hereto as
27 **Exhibit "57"**.

28 ...

1 74. On May 12, 2015, Siu Hang Lee and Eleanor Waikam Lee 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 702-1 is attached hereto as
4 **Exhibit “58”**.

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

8 76. On May 12, 2015, Kwai C. Ma filed a claim claiming priority under 11 U.S.C. §
9 507(a)(7) in the amount of \$2,125.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 705-1 is attached hereto as **Exhibit “60”**.

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

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

18 79. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
19 § 507(a)(7) in the amount of \$6,400.00 based on deposit toward purchase, lease or rental of
20 property. A true and correct copy of Claim 708-1 is attached hereto as **Exhibit “63”**.

21 80. On May 12, 2015, Ying Zhang filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,975.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 709-1 is attached hereto as **Exhibit “64”**.

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

28 . . .

1 82. On May 12, 2015, Jin Liang filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,875.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 711-1 is attached hereto as **Exhibit “66”**.

4 83. On May 12, 2015, Yeung So Ming and Cheng Tiao Shing filed a claim claiming
5 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,700.00 based on deposit toward
6 purchase, lease or rental of property. A true and correct copy of Claim 712-1 is attached hereto as
7 **Exhibit “67”**.

8 84. On May 12, 2015, Phung Kim Nguyen and Kiet Tran filed a claim claiming
9 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward
10 purchase, lease or rental of property. A true and correct copy of Claim 713-1 is attached hereto as
11 **Exhibit “68”**.

12 85. On May 12, 2015, Ping C. Wu filed a claim claiming priority under 11 U.S.C. §
13 507(a)(7) in the amount of \$750.00 based on deposit toward purchase, lease or rental of property.
14 A true and correct copy of Claim 715-1 is attached hereto as **Exhibit “69”**.

15 86. On May 12, 2015, Fanny Li filed a claim claiming priority under 11 U.S.C. §
16 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
17 property. A true and correct copy of Claim 716-1 is attached hereto as **Exhibit “70”**.

18 87. On May 12, 2015, Jimmy Sha filed a claim claiming priority under 11 U.S.C. §
19 507(a)(7) in the amount of \$1,645.00 based on deposit toward purchase, lease or rental of
20 property. A true and correct copy of Claim 718-1 is attached hereto as **Exhibit “71”**.

21 88. On May 12, 2015, Jimmy Sha filed a claim claiming priority under 11 U.S.C. §
22 507(a)(7) in the amount of \$1,150.00 based on deposit toward purchase, lease or rental of
23 property. A true and correct copy of Claim 719-1 is attached hereto as **Exhibit “72”**.

24 89. 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 hereto as **Exhibit “73”**.

27 90. On May 12, 2015, Hua’s Industry, LLC filed a claim claiming priority under 11
28 U.S.C. § 507(a)(7) in the amount of \$3075.00 based on deposit toward purchase, lease or rental of

1 property. A true and correct copy of Claim 721-1 is attached hereto as **Exhibit "74"**.

2 91. On May 12, 2015, Yu Ding Wu filed a claim claiming priority under 11 U.S.C. §
3 507(a)(7) in the amount of \$1,725.00 based on deposit toward purchase, lease or rental of
4 property. A true and correct copy of Claim 723-1 is attached hereto as **Exhibit "75"**.

5 92. 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 724-1 is attached hereto as **Exhibit "76"**.

8 93. On May 12, 2015, Muoi Luu filed a claim claiming priority under 11 U.S.C. §
9 507(a)(7) in the amount of \$1,375.00 based on deposit toward purchase, lease or rental of
10 property. A true and correct copy of Claim 725-1 is attached hereto as **Exhibit "77"**.

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

14 95. On May 12, 2015, Dien Shen Hsia Peng filed a claim claiming priority under 11
15 U.S.C. § 507(a)(7) in the amount of \$1,425.00 based on deposit toward purchase, lease or rental
16 of property. A true and correct copy of Claim 727-1 is attached hereto as **Exhibit "79"**.

17 96. On May 12, 2015, Tina Thuyla Ngo filed a claim claiming priority under 11
18 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease or rental
19 of property. A true and correct copy of Claim 728-1 is attached hereto as **Exhibit "80"**.

20 97. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
21 § 507(a)(7) in the amount of \$1,475.00 based on deposit toward purchase, lease or rental of
22 property. A true and correct copy of Claim 729-1 is attached hereto as **Exhibit "81"**.

23 98. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
24 § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
25 property. A true and correct copy of Claim 730-1 is attached hereto as **Exhibit "82"**.

26 99. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C.
27 § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of
28 property. A true and correct copy of Claim 731-1 is attached hereto as **Exhibit "83"**.

100. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,575.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 732-1 is attached hereto as **Exhibit "84"**.

101. On May 12, 2015, Ya Qing Zhang filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,825.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 737-1 is attached hereto as **Exhibit "85"**.

102. On May 13, 2015, Alice Casteneda filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 741-1 is attached hereto as **Exhibit "86"**.

103. On May 13, 2015, Wang Yang Li filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 742-1 is attached hereto as **Exhibit "87"**.

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

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

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

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

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

...

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

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

111. On May 13, 2015, Long Capture Holdings, LLC filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,150.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 750-1 is attached hereto as **Exhibit “95”**.

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

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

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

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

...

...

...

...

...

...

...

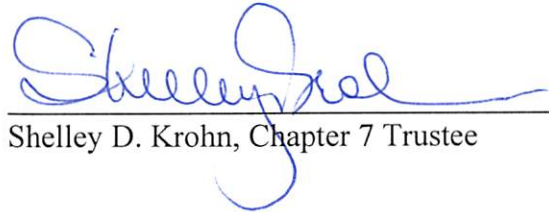
...

...

1 121. I now seek an order reclassifying the above referenced claims as general unsecured
2 claims.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct.

5 Dated this 24 day of July, 2020.

6
7 
8 _____
9 Shelley D. Krohn, Chapter 7 Trustee
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28