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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

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

**DECLARATION OF SHELLEY D.
KROHN IN SUPPORT OF TRUSTEE'S
SIXTH OMNIBUS OBJECTION TO
PROOFS OF CLAIM PURSUANT TO 11
U.S.C. § 502(b)(1) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 751-1, 752-1, 753-1,
754-1, 755-1, 756-1, 757-1, 758-1, 759-1, 760-
1, 761-1, 762-1, 763-1, 764-1, 765-1, 766-1,
767-1, 768-1, 769-1, 770-1, 771-1, 772-1, 775-
1, 776-1, 777-1, 778-1, 779-1, 781-1, 782-1,
783-1, 784-1, 785-1, 786-1, 787-1, 788-1, 789-
1, 790-1, 791-1, 792-1, 793-1, 794-1, 795-1,
796-1, 797-1, 798-1, 799-1, 800-1, 801-1, 802-
1, 803-1, 804-1, 805-1, 806-1, 807-1, 808-1,
809-1, 810-1, 811-1, 812-1, 816-1, 817-1, 818-
1, 819-1, 820-1, 821-1, 822-1, 823-1, 825-1,
826-1, 827-1, 828-1, 829-1, 831-1, 832-1, 837-
1, 838-1, 839-1, 840-1, 841-1, 842-1, 843-1,
846-1, 847-1, 848-1, 849-1, 850-1, 851-1, 852-
1, 855-1, 859-1, 860-1, 861-1, 862-1, 863-1,
864-1, 865-1, 866-1, AND 867-1, BASED ON
IMPROPER ASSERTION OF A
PRIORITY CLAIM BY A LANDLORD
FOR A SECURITY DEPOSIT**

Date of Hearing: September 15, 2020
Time of Hearing: 9:30 a.m.
Place: Courtroom No. To Be Determined
Foley Federal Building

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Judge: Honorable Gary Spraker¹

I, Shelley D. Krohn, declare as follows:

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

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

3. I make this declaration to support the *Trustee's Sixth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 751-1, 752-1, 753-1, 754-1, 755-1, 756-1, 757-1, 758-1, 759-1, 760-1, 761-1, 762-1, 763-1, 764-1, 765-1, 766-1, 767-1, 768-1, 769-1, 770-1, 771-1, 772-1, 775-1, 776-1, 777-1, 778-1, 779-1, 781-1, 782-1, 783-1, 784-1, 785-1, 786-1, 787-1, 788-1, 789-1, 790-1, 791-1, 792-1, 793-1, 794-1, 795-1, 796-1, 797-1, 798-1, 799-1, 800-1, 801-1, 802-1, 803-1, 804-1, 805-1, 806-1, 807-1, 808-1, 809-1, 810-1, 811-1, 812-1, 816-1, 817-1, 818-1, 819-1, 820-1, 821-1, 822-1, 823-1, 825-1, 826-1, 827-1, 828-1, 829-1, 831-1, 832-1, 837-1, 838-1, 839-1, 840-1, 841-1, 842-1, 843-1, 846-1, 847-1, 848-1, 849-1, 850-1, 851-1, 852-1, 855-1, 859-1, 860-1, 861-1, 862-1, 863-1, 864-1, 865-1, 866-1, and 867-1, 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.

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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, LLC (“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 13, 2015, Long Capture Holdings, LLC filed a claim claiming priority
10 under 11 U.S.C. § 507(a)(7) in the amount of \$900.00 based on deposit toward purchase, lease or
11 rental of property. A true and correct copy of Claim 751-1 is attached to the Trustee Declaration
12 as **Exhibit "1"**.

13 18. On May 13, 2015, May Yu Diep filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$950.00 based on deposit toward purchase, lease or rental of property.
15 A true and correct copy of Claim 752-1 is attached hereto as **Exhibit "2"**.

16 19. On May 13, 2015, Xian-Kui Situ filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 753-1 is attached hereto as **Exhibit "3"**.

19 20. On May 13, 2015, Zheng Xiong Xie filed a claim claiming priority under 11
20 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental
21 of property. A true and correct copy of Claim 754-1 is attached hereto as **Exhibit "4"**.

22 21. On May 13, 2015, Tony Dong filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$1,950.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 755-1 is attached hereto as **Exhibit "5"**.

25 22. On May 13, 2015, Chun Feng Ou and Chia Chi Ou filed a claim claiming priority
26 under 11 U.S.C. § 507(a)(7) in the amount of \$1,050.00 based on deposit toward purchase, lease
27 or rental of property. A true and correct copy of Claim 756-1 is attached hereto as **Exhibit "6"**.

28 . . .

23. On May 13, 2015, Nina Chen filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 757-1 is attached hereto as **Exhibit "7"**.

24. On May 13, 2015, Nina Chen filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 758-1 is attached hereto as **Exhibit "8"**.

25. On May 13, 2015, Nina Chen filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,925.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 759-1 is attached hereto as **Exhibit "9"**.

26. On May 13, 2015, Shao Min Wu filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$800.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 760-1 is attached hereto as **Exhibit "10"**.

27. On May 13, 2015, Xiao Yan Cheng filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 761-1 is attached hereto as **Exhibit "11"**.

28. On May 13, 2015, Yi Qin Shen filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$850.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 762-1 is attached hereto as **Exhibit "12"**.

29. On May 13, 2015, Qian Wang filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 763-1 is attached hereto as **Exhibit "13"**.

30. On May 13, 2015, Litho Zhang filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,645.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 764-1 is attached hereto as **Exhibit "14"**.

31. On May 13, 2015, Li Li filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,975.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 765-1 is attached hereto as **Exhibit "15"**.

...

1 32. On May 13, 2015, Wang Yang Li filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,225.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 766-1 is attached hereto as **Exhibit "16"**.

4 33. On May 13, 2015, Wang Yang Li filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,510.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 767-1 is attached hereto as **Exhibit "17"**.

7 34. On May 13, 2015, Glen Chan and Maria Chan filed a claim claiming priority under
8 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or
9 rental of property. A true and correct copy of Claim 768-1 is attached hereto as **Exhibit "18"**.

10 35. On May 13, 2015, Glen Chan and Maria Chan filed a claim claiming priority under
11 11 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease or
12 rental of property. A true and correct copy of Claim 769-1 is attached hereto as **Exhibit "19"**.

13 36. On May 13, 2015, Sharon Louie and Yuen Yu Louie filed a claim claiming
14 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,050.00 based on deposit toward
15 purchase, lease or rental of property. A true and correct copy of Claim 770-1 is attached hereto as
16 **Exhibit "20"**.

17 37. On May 13, 2015, Sharon Louie and Yuen Yu Louie filed a claim claiming
18 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward
19 purchase, lease or rental of property. A true and correct copy of Claim 771-1 is attached hereto as
20 **Exhibit "21"**.

21 38. On May 13, 2015, James Lam and Jing Xia Lam filed a claim claiming priority
22 under 11 U.S.C. § 507(a)(7) in the amount of \$2,112.50 based on deposit toward purchase, lease
23 or rental of property. A true and correct copy of Claim 772-1 is attached hereto as **Exhibit "22"**.

24 39. On May 13, 2015, Jian Hong Chen and Jeannie C. Ung filed a claim for \$2,378.00
25 and claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit
26 toward purchase, lease or rental of property. A true and correct copy of Claim 775-1 is attached
27 hereto as **Exhibit "23"**.

28 ...

1 40. On May 13, 2015, Thao T. Hoang filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 776-1 is attached hereto as **Exhibit "24"**.

4 41. On May 13, 2015, Thao T. Hoang filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 777-1 is attached hereto as **Exhibit "25"**.

7 42. On May 13, 2015, David Baudoin filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$1,945.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 778-1 is attached hereto as **Exhibit "26"**.

10 43. On May 13, 2015, Jian Hong Chen filed a claim claiming priority under 11 U.S.C.
11 § 507(a)(7) in the amount of \$2,300.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 779-1 is attached hereto as **Exhibit "27"**.

13 44. On May 13, 2015, John Yao filed a claim for \$2,510.00 and claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$2,260.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 781-1 is attached hereto as **Exhibit "28"**.

16 45. On May 13, 2015, Daniel Yau filed a claim for \$3,735.00 and claiming priority
17 under 11 U.S.C. § 507(a)(7) in the amount of \$2,450.00 based on deposit toward purchase, lease
18 or rental of property. A true and correct copy of Claim 782-1 is attached hereto as **Exhibit "29"**.

19 46. On May 13, 2015, Joanna Yip filed a claim for \$2,715.00 and claiming priority
20 under 11 U.S.C. § 507(a)(7) in the amount of \$1,350.00 based on deposit toward purchase, lease
21 or rental of property. A true and correct copy of Claim 783-1 is attached hereto as **Exhibit "30"**.

22 47. On May 13, 2015, Li Chuang filed a claim for \$3,578.00 and claiming priority
23 under 11 U.S.C. § 507(a)(7) in the amount of \$1,850.00 based on deposit toward purchase, lease
24 or rental of property. A true and correct copy of Claim 784-1 is attached hereto as **Exhibit "31"**.

25 48. On May 13, 2015, Huang Guang Nie filed a claim for \$2,790.00 and claiming
26 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 785-1 is attached hereto as
28 **Exhibit "32"**.

1 49. On May 13, 2015, Michelle Tran filed a claim for \$3,326.00 and claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 786-1 is attached hereto as **Exhibit “33”**.

4 50. On May 13, 2015, Penny Tuyet Ha filed a claim for \$3,400.00 and claiming
5 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,700.00 based on deposit toward
6 purchase, lease or rental of property. A true and correct copy of Claim 787-1 is attached hereto as
7 **Exhibit “34”**.

8 51. On May 13, 2015, Josephine L. Regala filed a claim for \$3,000.00 and 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 788-1 is attached hereto as
11 **Exhibit “35”**.

12 52. On May 13, 2015, LLN Investment ING filed a claim for \$4,483.00 and claiming
13 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,400.00 based on deposit toward
14 purchase, lease or rental of property. A true and correct copy of Claim 789-1 is attached hereto as
15 **Exhibit “36”**.

16 53. On May 13, 2015, E & E Investment, Inc. filed a claim for \$3,064.96 and claiming
17 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,650.00 based on deposit toward
18 purchase, lease or rental of property. A true and correct copy of Claim 790-1 is attached hereto as
19 **Exhibit “37”**.

20 54. On May 13, 2015, E & E Investment, Inc. filed a claim for \$3,833.00 and claiming
21 priority under 11 U.S.C. § 507(a)(7) in the amount of \$2,450.00 based on deposit toward
22 purchase, lease or rental of property. A true and correct copy of Claim 791-1 is attached hereto as
23 **Exhibit “38”**.

24 55. On May 13, 2015, Frank Hsia filed a claim for \$3,983.00 and claiming priority
25 under 11 U.S.C. § 507(a)(7) in the amount of \$2,000.00 based on deposit toward purchase, lease
26 or rental of property. A true and correct copy of Claim 792-1 is attached hereto as **Exhibit “39”**.

27 56. On May 13, 2015, Frank Hsia filed a claim for \$2,100.00 and claiming priority
28 under 11 U.S.C. § 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease

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1 or rental of property. A true and correct copy of Claim 793-1 is attached hereto as **Exhibit "40"**.

2 57. On May 13, 2015, Benny Kwan filed a claim for \$2,612.00 and claiming priority
3 under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease
4 or rental of property. A true and correct copy of Claim 794-1 is attached hereto as **Exhibit "41"**.

5 58. On May 13, 2015, Benny Kwan filed a claim for \$2,540.00 and claiming priority
6 under 11 U.S.C. § 507(a)(7) in the amount of \$1,155.00 based on deposit toward purchase, lease
7 or rental of property. A true and correct copy of Claim 795-1 is attached hereto as **Exhibit "42"**.

8 59. On May 13, 2015, David Wong filed a claim for \$2,723.00 and claiming priority
9 under 11 U.S.C. § 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease
10 or rental of property. A true and correct copy of Claim 796-1 is attached hereto as **Exhibit "43"**.

11 60. On May 13, 2015, David Wong filed a claim for \$2,621.44 and claiming priority
12 under 11 U.S.C. § 507(a)(7) in the amount of \$1,318.00 based on deposit toward purchase, lease
13 or rental of property. A true and correct copy of Claim 797-1 is attached hereto as **Exhibit "44"**.

14 61. On May 13, 2015, David Wong filed a claim for \$2,833.00 and claiming priority
15 under 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease
16 or rental of property. A true and correct copy of Claim 798-1 is attached hereto as **Exhibit "45"**.

17 62. On May 13, 2015, Wensi Xi and Rong Shao filed a claim for \$2,209.00 and
18 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward
19 purchase, lease or rental of property. A true and correct copy of Claim 799-1 is attached hereto as
20 **Exhibit "46"**.

21 63. On May 13, 2015, Wensi Xi and Rong Shao filed a claim for \$2,685.00 and
22 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward
23 purchase, lease or rental of property. A true and correct copy of Claim 800-1 is attached hereto as
24 **Exhibit "47"**.

25 64. On May 13, 2015, Wensi Xi and Rong Shao filed a claim for \$2,502.00 and
26 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward
27 purchase, lease or rental of property. A true and correct copy of Claim 801-1 is attached hereto as
28 **Exhibit "48"**.

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1 65. On May 13, 2015, Wensi Xi filed a claim for \$2,107.00 and claiming priority
2 under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease
3 or rental of property. A true and correct copy of Claim 802-1 is attached hereto as **Exhibit “49”**.

4 66. On May 13, 2015, Rong Shao filed a claim for \$1,661.00 and claiming priority
5 under 11 U.S.C. § 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease
6 or rental of property. A true and correct copy of Claim 803-1 is attached hereto as **Exhibit “50”**.

7 67. On May 13, 2015, Min Zhao filed a claim for \$3,040.00 and claiming priority
8 under 11 U.S.C. § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease
9 or rental of property. A true and correct copy of Claim 804-1 is attached hereto as **Exhibit “51”**.

10 68. On May 13, 2015, RZ Investment Nevada, LLC filed a claim for \$2,228.00 and
11 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward
12 purchase, lease or rental of property. A true and correct copy of Claim 805-1 is attached hereto as
13 **Exhibit “52”**.

14 69. On May 13, 2015, Xuefei Jin and Lisha Bian filed a claim for \$2,845.00 and
15 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward
16 purchase, lease or rental of property. A true and correct copy of Claim 806-1 is attached hereto as
17 **Exhibit “53”**.

18 70. On May 13, 2015, Xuefei Jin and Lisha Bian filed a claim for \$2,798.00 and
19 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,200.00 based on deposit toward
20 purchase, lease or rental of property. A true and correct copy of Claim 807-1 is attached hereto as
21 **Exhibit “54”**.

22 71. On May 13, 2015, Lin and Chen Investment, LLC filed a claim for \$2,815.00 and
23 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,450.00 based on deposit toward
24 purchase, lease or rental of property. A true and correct copy of Claim 808-1 is attached hereto as
25 **Exhibit “55”**.

26 72. On May 13, 2015, Lin and Chen Investment, LLC filed a claim for \$3,100.00 and
27 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,600.00 based on deposit toward
28 purchase, lease or rental of property. A true and correct copy of Claim 809-1 is attached hereto as

1 **Exhibit "56"**.

2 73. On May 13, 2015, Lin and Chen Investment, LLC filed a claim for \$3,107.00 and
3 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,707.00 based on deposit toward
4 purchase, lease or rental of property. A true and correct copy of Claim 810-1 is attached hereto as
5 **Exhibit "57"**.

6 74. On May 14, 2015, Matthew K. Chuang and Siew Mei Tan filed a claim claiming
7 priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,150.00 based on deposit toward
8 purchase, lease or rental of property. A true and correct copy of Claim 811-1 is attached hereto as
9 **Exhibit "58"**.

10 75. On May 14, 2015, Rocky Chang filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 812-1 is attached hereto as **Exhibit "59"**.

13 76. On May 14, 2015, Carla Zvosec filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$1,295.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 816-1 is attached hereto as **Exhibit "60"**.

16 77. On May 14, 2015, Hsiu Chu Chen filed a claim claiming priority under 11 U.S.C.
17 § 507(a)(7) in the amount of \$1,500.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 817-1 is attached hereto as **Exhibit "61"**.

19 78. On May 14, 2015, Yang Yu filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$1,700.00 based on deposit toward purchase, lease or rental of
21 property. A true and correct copy of Claim 818-1 is attached hereto as **Exhibit "62"**.

22 79. On May 14, 2015, Yang Yu filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$1,300.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 819-1 is attached hereto as **Exhibit "63"**.

25 80. On May 14, 2015, Yang Yu filed a claim claiming priority under 11 U.S.C. §
26 507(a)(7) in the amount of \$1,900.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 820-1 is attached hereto as **Exhibit "64"**.

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HOUAMAND LAW FIRM, LTD.
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1 81. On May 14, 2015, Yang Yu filed a claim claiming priority under 11 U.S.C. §
2 507(a)(7) in the amount of \$1,235.00 based on deposit toward purchase, lease or rental of
3 property. A true and correct copy of Claim 821-1 is attached hereto as **Exhibit “65”**.

4 82. On May 14, 2015, Yang Yu filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,135.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 822-1 is attached hereto as **Exhibit “66”**.

7 83. On May 14, 2015, Yang Yu 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 823-1 is attached hereto as **Exhibit “67”**.

10 84. On May 14, 2015, Livia Brady nee Grabowski filed a claim claiming priority
11 under 11 U.S.C. § 507(a)(7) in the amount of \$1,070.00 based on deposit toward purchase, lease
12 or rental of property. A true and correct copy of Claim 825-1 is attached hereto as **Exhibit “68”**.

13 85. On May 14, 2015, Livia Brady nee Grabowski filed a claim claiming priority
14 under 11 U.S.C. § 507(a)(7) in the amount of \$1,100.00 based on deposit toward purchase, lease
15 or rental of property. A true and correct copy of Claim 826-1 is attached hereto as **Exhibit “69”**.

16 86. On May 14, 2015, US Oriental Investments, LLC filed a claim claiming priority
17 under 11 U.S.C. § 507(a)(7) in the amount of \$700.00 based on deposit toward purchase, lease or
18 rental of property. A true and correct copy of Claim 827-1 is attached hereto as **Exhibit “70”**.

19 87. On May 14, 2015, Liyan Chen filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$850.00 based on deposit toward purchase, lease or rental of property.
21 A true and correct copy of Claim 828-1 is attached hereto as **Exhibit “71”**.

22 88. On May 14, 2015, Yushang Hu filed a claim claiming priority under 11 U.S.C. §
23 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental of
24 property. A true and correct copy of Claim 829-1 is attached hereto as **Exhibit “72”**.

25 89. On May 14, 2015, Hong Yan Xiao filed a claim claiming priority under 11 U.S.C.
26 § 507(a)(7) in the amount of \$1,590.00 based on deposit toward purchase, lease or rental of
27 property. A true and correct copy of Claim 831-1 is attached hereto as **Exhibit “73”**.

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1 90. On May 14, 2015, Tzung Yurn Zizka filed a claim claiming priority under 11
2 U.S.C. § 507(a)(7) in the amount of \$2,097.00 based on deposit toward purchase, lease or rental
3 of property. A true and correct copy of Claim 832-1 is attached hereto as **Exhibit “74”**.

4 91. On May 14, 2015, Li Guo filed a claim claiming priority under 11 U.S.C. §
5 507(a)(7) in the amount of \$1,650.00 based on deposit toward purchase, lease or rental of
6 property. A true and correct copy of Claim 837-1 is attached hereto as **Exhibit “75”**.

7 92. On May 14, 2015, Li Jiang filed a claim claiming priority under 11 U.S.C. §
8 507(a)(7) in the amount of \$1,050.00 based on deposit toward purchase, lease or rental of
9 property. A true and correct copy of Claim 838-1 is attached hereto as **Exhibit “76”**.

10 93. On May 14, 2015, Grace Lee filed a claim claiming priority under 11 U.S.C. §
11 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of
12 property. A true and correct copy of Claim 839-1 is attached hereto as **Exhibit “77”**.

13 94. On May 14, 2015, BSLT, LLC filed a claim claiming priority under 11 U.S.C. §
14 507(a)(7) in the amount of \$2,500.00 based on deposit toward purchase, lease or rental of
15 property. A true and correct copy of Claim 840-1 is attached hereto as **Exhibit “78”**.

16 95. On May 14, 2015, BSLT, LLC filed a claim claiming priority under 11 U.S.C. §
17 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or rental of
18 property. A true and correct copy of Claim 841-1 is attached hereto as **Exhibit “79”**.

19 96. On May 14, 2015, BSLT, LLC filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$1,200.00 based on deposit toward purchase, lease or rental of
21 property. A true and correct copy of Claim 842-1 is attached hereto as **Exhibit “80”**.

22 97. On May 14, 2015, Eden Gardens, LLC filed a claim claiming priority under 11
23 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on deposit toward purchase, lease or rental
24 of property. A true and correct copy of Claim 843-1 is attached hereto as **Exhibit “81”**.

25 98. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
26 11 U.S.C. § 507(a)(7) in the amount of \$1,150.00 based on deposit toward purchase, lease or
27 rental of property. A true and correct copy of Claim 846-1 is attached hereto as **Exhibit “82”**.

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1 99. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
2 11 U.S.C. § 507(a)(7) in the amount of \$1,250.00 based on deposit toward purchase, lease or
3 rental of property. A true and correct copy of Claim 847-1 is attached hereto as **Exhibit “83”**.

4 100. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
5 11 U.S.C. § 507(a)(7) in the amount of \$1,400.00 based on deposit toward purchase, lease or
6 rental of property. A true and correct copy of Claim 848-1 is attached hereto as **Exhibit “84”**.

7 101. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
8 11 U.S.C. § 507(a)(7) in the amount of \$1,550.00 based on deposit toward purchase, lease or
9 rental of property. A true and correct copy of Claim 849-1 is attached hereto as **Exhibit “85”**.

10 102. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
11 11 U.S.C. § 507(a)(7) in the amount of \$4,250.00 based on deposit toward purchase, lease or
12 rental of property. A true and correct copy of Claim 850-1 is attached hereto as **Exhibit “86”**.

13 103. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
14 11 U.S.C. § 507(a)(7) in the amount of \$2,200.00 based on deposit toward purchase, lease or
15 rental of property. A true and correct copy of Claim 851-1 is attached hereto as **Exhibit “87”**.

16 104. On May 14, 2015, Golden Sun Dynasty, LLC filed a claim claiming priority under
17 11 U.S.C. § 507(a)(7) in the amount of \$1,125.00 based on deposit toward purchase, lease or
18 rental of property. A true and correct copy of Claim 852-1 is attached hereto as **Exhibit “88”**.

19 105. On May 14, 2015, Helen Wang filed a claim claiming priority under 11 U.S.C. §
20 507(a)(7) in the amount of \$1,095.00 based on deposit toward purchase, lease or rental of
21 property. A true and correct copy of Claim 855-1 is attached hereto as **Exhibit “89”**.

22 106. On May 14, 2015, Hweichen Lily Chang and Yin Fang Wang filed a claim
23 claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$850.00 based on deposit toward
24 purchase, lease or rental of property. A true and correct copy of Claim 859-1 is attached hereto as
25 **Exhibit “90”**.

26 107. On May 14, 2015, Hweichen Lily Chang and Yin Fang Wang filed a claim for
27 \$5241.00, claiming a secured claim of \$3,266.00 and claiming priority under 11 U.S.C. §
28 507(a)(7) in the amount of \$1,975.00 based on deposit toward purchase, lease or rental of

property. A true and correct copy of Claim 860-1 is attached hereto as **Exhibit “91”**.

108. On May 14, 2015, Acetainer Equipment Serv Rtmt filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$750.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 861-1 is attached hereto as **Exhibit “92”**.

109. On May 14, 2015, Acetainer Equipment Serv Rtmt filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,375.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 862-1 is attached hereto as **Exhibit “93”**.

110. On May 14, 2015, Ping Gao filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,680.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 863-1 is attached hereto as **Exhibit “94”**.

111. On May 14, 2015, Xiadi Song filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,175.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 864-1 is attached hereto as **Exhibit “95”**.

112. On May 14, 2015, Chi Chen filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,750.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 865-1 is attached hereto as **Exhibit “96”**.

113. On May 14, 2015, Nhan Quang Diep filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$852.90 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 866-1 is attached hereto as **Exhibit “97”**.

114. On May 14, 2015, Michael Cho filed a claim claiming priority under 11 U.S.C. § 507(a)(7) in the amount of \$1,000.00 based on deposit toward purchase, lease or rental of property. A true and correct copy of Claim 867-1 is attached hereto as **Exhibit “98”**.

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.

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

5 121. I now seek an order reclassifying the above referenced claims as general unsecured
6 claims.

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

9 Dated this 13 day of August, 2020.

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13 Shelley D. Krohn, Chapter 7 Trustee
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