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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

NOTICE OF HEARING ON TRUSTEE'S SEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM PURSUANT TO 11 U.S.C. § 502(b)(1) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007—CLAIM NUMBERS 65-2, 195-1, 214-1, 240-1, 307-1, 335-1, 594-1, 597-1, 659-1, 694-1, 717-1, 736-1, 868-1, 869-1, 870-1, 871-1, 872-1, 873-1, 874-1, 875-1, 876-1, 877-1, 878-1, 879-1, 880-1, 881-1, 882-1, 883-1, 884-1, 885-1, 886-1, 887-1, 888-1, 889-1, 890-1, 891-1, 892-1, 893-1, 894-1, 899-1, 903-1, 905-1, 906-1, 908-1, 909-1, 915-1, AND 916-1, 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
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

NOTICE IS HEREBY GIVEN that the *Trustee's Seventh Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—*

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1 *Claim Numbers 65-2, 195-1, 214-1, 240-1, 307-1, 335-1, 594-1, 597-1, 659-1, 694-1, 717-1, 736-*
 2 *1, 868-1, 869-1, 870-1, 871-1, 872-1, 873-1, 874-1, 875-1, 876-1, 877-1, 878-1, 879-1, 880-1,*
 3 *881-1, 882-1, 883-1, 884-1, 885-1, 886-1, 887-1, 888-1, 889-1, 890-1, 891-1, 892-1, 893-1, 894-*
 4 *1, 899-1, 903-1, 905-1, 906-1, 908-1, 909-1, 915-1, and 916-1, Based On Improper Assertion Of*
 5 *A Priority Claim by a Landlord For a Security Deposit (the “Objection”) was filed by Shelley D.*
 6 *Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel*
 7 *of record, Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd.¹*

8 The Objection seeks to disallow the priority asserted by the following claims pursuant to
 9 Section 507(a)(4) and reclassify them as general unsecured claims:

Claimant	Proof of Claim No.	Grounds for objection ²
Alexandra Assets, LLC	307-1	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. 17-19.
Bailey, Richard Peter and Jingru Luo	594-1	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. 17-19.
Cai, Hong	905-1	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. 17-19.
Cardenas, Victor and Adriana	869-1	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. 17-19.

24 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
 25 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
 26 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
 27 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”.

28 ² Unless otherwise stated, page references are to the page within this motion stating the legal
 argument for the objection.

1	Chaskin, Richard	240-1	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. 17-19.
4	Deng, Dekang	694-1	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. 17-19.
7	Evergreen 99, LLC	882-1	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. 17-19.
10	Fortune 77, LLC	884-1	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. 17-19.
13	Golden Sun Dynasty,	892-1	Claim improperly asserts priority under 11
14	LLC		U.S.C. § 507(a)(7). This type of priority claim
15			may not be asserted by a landlord. <i>See</i> p. 17-19.
16	Golden Sun Dynasty,	893-1	Claim improperly asserts priority under 11
17	LLC		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 17-19.
19	Golden Sun Dynasty,	894-1	Claim improperly asserts priority under 11
20	LLC		U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 17-19.
22	He, Yao Chi and Rui	659-1	Claim improperly asserts priority under 11
23	Yan Guo		U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 17-19.
25	Henry, Chu Hsiao Wen	915-1	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. 17-19.
28			

1	Hu, Hong Feng	597-1	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. 17-19.
4	Huang, Allen Wei-Lun	872-1	Claim improperly asserts priority under 11
5	and Wei-Tze Chen		U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 17-19.
7	Huang, Pearson	65-2	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. 17-19.
10	Huynh, Jimmy	868-1	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. 17-19.
13	Kang, Chang Hsiu	906-1	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. 17-19.
16	Lam, James and Jing	909-1	Claim improperly asserts priority under 11
17	Xia Lam		U.S.C. § 507(a)(7). This type of priority claim
18			may not be asserted by a landlord. <i>See</i> p. 17-19.
19	Li, Fanny	717-1	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. 17-19.
22	Li, Qian Yan	874-1	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. 17-19.
25	Li, Yawen	885-1	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. 17-19.
28			

1	Lin and Chen	908-1	Claim improperly asserts priority under 11
2	Investment, LLC		U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 17-19.
4	Lo, Jocelyn	214-1	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. 17-19.
7	Lu, Binh and Minh Ly	887-1	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. 17-19.
10	Lu, Binh and Minh Ly	888-1	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. 17-19.
13	Lu, Binh and Minh Ly	889-1	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. 17-19.
16	Lu, Binh and Minh Ly	890-1	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. 17-19.
19	Lu, Binh and Minh Ly	891-1	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. 17-19.
22	Ma, Harry	916-1	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. 17-19.
25	Moshin Hafeez – Plutus	899-1	Claim improperly asserts priority under 11
26	Real Estate Investments		U.S.C. § 507(a)(7). This type of priority claim
27	filed		may not be asserted by a landlord. <i>See</i> p. 17-19.
28			

1	Quach, Howard and	880-1	Claim improperly asserts priority under 11
2	Mai Tran		U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 17-19.
4	Quach, Howard and	881-1	Claim improperly asserts priority under 11
5	Mai Tran		U.S.C. § 507(a)(7). This type of priority claim
6			may not be asserted by a landlord. <i>See</i> p. 17-19.
7	Six Sigma	871-1	Claim improperly asserts priority under 11
8	Management, LLC		U.S.C. § 507(a)(7). This type of priority claim
9			may not be asserted by a landlord. <i>See</i> p. 17-19.
10	Six Sigma	873-1	Claim improperly asserts priority under 11
11	Management, LLC		U.S.C. § 507(a)(7). This type of priority claim
12			may not be asserted by a landlord. <i>See</i> p. 17-19.
13	Tang, Bo	195-1	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. 17-19.
16	Tang, Yan Rong	886-1	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. 17-19.
19	Vinca Family Limited	870-1	Claim improperly asserts priority under 11
20	Partnership		U.S.C. § 507(a)(7). This type of priority claim
21			may not be asserted by a landlord. <i>See</i> p. 17-19.
22	Weng, Winston V. and	335-1	Claim improperly asserts priority under 11
23	Dao To		U.S.C. § 507(a)(7). This type of priority claim
24			may not be asserted by a landlord. <i>See</i> p. 17-19.
25	Wong, Steven and	903-1	Claim improperly asserts priority under 11
26	Sonia Chou		U.S.C. § 507(a)(7). This type of priority claim
27			may not be asserted by a landlord. <i>See</i> p. 17-19.
28			

1	Young, Louis and Cory	875-1	Claim improperly asserts priority under 11
2	Young		U.S.C. § 507(a)(7). This type of priority claim
3			may not be asserted by a landlord. <i>See</i> p. 17-19.
4	Yu, Chia Tsung	883-1	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. 17-19.
7	Zhang, Jimmy	876-1	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. 17-19.
10	Zhang, Jimmy	877-1	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. 17-19.
13	Zhang, Lei	878-1	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. 17-19.
16	Zhang, Ya Qing	736-1	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. 17-19.
19	Zhong, Xia	879-1	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. 17-19.

22
 23 A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee's*
 24 *Trustee's Seventh Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1)*
 25 *And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 65-2, 195-1, 214-1, 240-1,*
 26 *307-1, 335-1, 594-1, 597-1, 659-1, 694-1, 717-1, 736-1, 868-1, 869-1, 870-1, 871-1, 872-1, 873-*
 27 *1, 874-1, 875-1, 876-1, 877-1, 878-1, 879-1, 880-1, 881-1, 882-1, 883-1, 884-1, 885-1, 886-1,*
 28 *887-1, 888-1, 889-1, 890-1, 891-1, 892-1, 893-1, 894-1, 899-1, 903-1, 905-1, 906-1, 908-1, 909-*

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1 *1, 915-1, and 916-1, Based On Improper Assertion Of A Priority Claim by a Landlord For a*
2 *Security Deposit* are on file with the Clerk’s Office of the United States Bankruptcy Court, 300
3 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Objection and any
4 supporting declarations may also be obtained from counsel for the Trustee or through the
5 Bankruptcy Court’s website at www.nvb.uscourts.gov.

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

12 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
13 with the court. You *must* also serve your written response on the person who sent you this
14 notice.

15 If you do not file a written response with the court, or if you do not serve your written
16 response on the person who sent you this notice, then:

- 17 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 18 • The Court may *rule against you* without formally calling the matter at the hearing.

19 **NOTICE IS FURTHER GIVEN** that the hearing on said Objection will be held before a
20 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las
21 Vegas, Nevada on September 15, 2020, at 9:30 a.m. The hearing on the Objection will take place
22 in a courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19)
23 pandemic, the Court may conduct a telephonic hearing on the Objection. Please visit the website
24 for the U.S. Bankruptcy Court for the District of Nevada for updates on whether the Court will be
25 conducting telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

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