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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

**EX PARTE MOTION TO EXCEED PAGE
LIMIT PURSUANT TO LOCAL RULE
9014(e)(1) FOR TRUSTEE’S NINTH
OMNIBUS OBJECTION TO PROOFS OF
CLAIM PURSUANT TO 11 U.S.C. §
502(b)(1) AND FEDERAL RULE OF
BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 6-1, 7-1, 15-1, 18-1, 32-
1, 34-1, 40-1, 41-1, 49-1, 59-1, 60-1, 72-1, 83-
1, 86-1, 87-1, 97-1, 113-1, 115-1, 118-1, 119-
1, 123-1, 128-1, 163-1, 231-1, 292-1, 293-1,
296-1, 338-1, 527-1, 612-1, 704-1, 813-1,
815-1, 833-1, 834-1, 914-1, 921-1, 924-1, 929-
1, AND 930-1, BASED ON DUPLICATE
CLAIMS FILED BY BOTH A
LANDLORD AND A TENANT FOR A
SECURITY DEPOSIT**

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

Judge: Honorable Gary Spraker

Shelley D. Krohn (the “Trustee”), the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd., respectfully requests leave of the Court pursuant to Local Rule 9014(e)(1) to file the *Trustee’s Ninth Omnibus Objection To Proofs Of*

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1 *Claim Pursuant To 11 U.S.C. § 502(b)(1) and Federal Rule of Bankruptcy Procedure 3007—*
2 *Claim Numbers 6-1, 7-1, 15-1, 18-1, 32-1, 34-1, 40-1, 41-1, 49-1, 59-1, 60-1, 72-1, 83-1, 86-1,*
3 *87-1, 97-1, 113-1, 115-1, 118-1, 119-1, 123-1, 128-1, 163-1, 231-1, 292-1, 293-1, 296-1, 338-1,*
4 *527-1, 612-1, 704-1, 813-1 , 815-1, 833-1, 834-1, 914-1, 921-1, 924-1, 929-1, and 930-1 Based*
5 *on Duplicate Claims Filed by Both a Landlord and a Tenant for A Security Deposit (the*
6 *“Objection”)* in excess of the twenty (20) page limit as prescribed in Rule 9014(e)(1) of the Local
7 Rules of Bankruptcy Practice.¹

8 Good cause exists to exceed the page limitation. It is necessary for the Trustee to exceed
9 the page limitation to adequately address the factual allegations and legal analysis set forth in the
10 Objection which exceeds the 20-page limitation by 6 pages. The Objection is an omnibus
11 objection and the reason for the excess page length is the listing and summary of roughly seventy-
12 nine different claims. The legal argument section comprises only a small portion of the Objection
13 and the excess length is a result of the summary of the claims objected to in the Objection.²

14 The Trustee additionally requests that the Court waive the requirement under Local Rule
15 9014(e)(1) for a table of authorities and a table of contents. The legal argument section of the
16 Objection is relatively small and straightforward. Had each claim been objected to on an
17 individual basis, none of the respective motions would have exceeded the page length
18 requirement. The Objection has been filed as an omnibus objection to promote judicial economy,
19 and to allow multiple objections to be heard at the same time where a common legal argument is
20 raised. A table of contents and table of authorities will not enhance or simplify the Objection and
21 will potentially confuse claimants who review the Objection.

22 ...

23 _____
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 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 For the foregoing reasons, the Trustee respectfully requests that the Court approve this Ex
2 Parte Motion and authorize the Trustee to file her Motion in excess of the 20-pages limitation as
3 set forth in Local Rule 9014(e)(1), and that the court waive the requirement under Local Rule
4 9014(e)(1) that the Objection provide a table of contents and table of authorities.

5 Dated this 14th day of August, 2020.

6 **HOUAMAND LAW FIRM, LTD.**

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