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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
TENTH OMNIBUS OBJECTION TO
PROOFS OF CLAIM PURSUANT TO 11
U.S.C. § 502(b)(1) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 3007—
CLAIM NUMBERS 60-1, 87-1, 137-1, 230-
1, 231-1, 290-1, 501-1, 681-1, 683-1, AND
735-1, BASED ON IMPROPER
ASSERTION OF A SECURED CLAIM**

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 Tenth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007— Claim Numbers 60-1, 87-1, 137-1, 230-1, 231-1, 290-1, 501-1, 681-1, 683-1, and 735-1, Based on Improper Assertion of a Secured Claim* (the "Objection") was filed by Shelley D. Krohn, the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record,

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1 Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the Houmand Law Firm, Ltd.¹

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

4	Claimant	Proof of Claim No.	Grounds for objection ²
5	Bell, April and Kenneth	60-1	Claim improperly asserts a secured claim with
6			no evidence of security agreement. <i>See</i> p. 8.
7	Chang, Wei Chen	137-1	Claim improperly asserts a secured claim with
8			no evidence of security agreement. <i>See</i> p. 8.
9	Chen, Jeffrey and	501-1	Claim improperly asserts a secured claim with
10	Shirley Zheng		no evidence of security agreement. <i>See</i> p. 8.
11	Huang, Yichao	290-1	Claim improperly asserts a secured claim with
12			no evidence of security agreement. <i>See</i> p. 8.
13	Johnson, Karen	231-1	Claim improperly asserts a secured claim with
14	Elizabeth		no evidence of security agreement. <i>See</i> p. 8.
15	Lawrence, Janet	87-1	Claim improperly asserts a secured claim with
16			no evidence of security agreement. <i>See</i> p. 8.
17	Qin, Wei	230-1	Claim improperly asserts a secured claim with
18			no evidence of security agreement. <i>See</i> p. 8.
19	Wong, Yuk S. and Xiao	681-1	Claim improperly asserts a secured claim with
20	Y Zhu		no evidence of security agreement. <i>See</i> p. 8.
21	Wong, Yuk S. and Xiao	683-1	Claim improperly asserts a secured claim with
22	Y Zhu		no evidence of security agreement. <i>See</i> p. 8.

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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”.

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

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Zhang, Ya Qing 735-1	Claim improperly asserts a secured claim with no evidence of security agreement. <i>See</i> p. 8.
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A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee's Tenth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 60-1, 87-1, 137-1, 230-1, 231-1, 290-1, 501-1, 681-1, 683-1, and 735-1, Based on Improper Assertion of a Secured Claim* are on file with the Clerk's Office of the United States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies of the Objection and any supporting declarations may also be obtained from counsel for the Trustee or through the Bankruptcy Court's website at www.nvb.uscourts.gov.

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

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

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

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

NOTICE IS FURTHER GIVEN that the hearing on said Motion will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada on September 15, 2020, at 9:30 a.m. The hearing on the Objection will take place in a courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19)

1 pandemic, the Court may conduct a telephonic hearing on the Objection. Please visit the website
2 for the U.S. Bankruptcy Court for the District of Nevada for updates on whether the Court will be
3 conducting telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

4 **NOTICE IS FURTHER GIVEN** that this hearing may be continued from time to time
5 without further notice except for the announcement of any adjourned dates and times at the
6 above-noted hearing or any adjournment thereof.

7 Dated this 14th day of August, 2020.

8 **HOUAMAND LAW FIRM, LTD.**

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10 By: */s/ Bradley G. Sims*
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