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*Electronically Filed On: August 18, 2020*

6 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

7  
8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10 In re:  
11 AMERI-DREAM REALTY, LLC,  
12 Debtor.

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

**NOTICE OF HEARING ON TRUSTEE'S  
ELEVENTH OMNIBUS OBJECTION TO  
PROOFS OF CLAIM PURSUANT TO 11  
U.S.C. § 502(b)(1) AND FEDERAL RULE  
OF BANKRUPTCY PROCEDURE 3007—  
CLAIM NUMBERS 50-3, 56-1, 58-3, 63-1,  
93-1, 96-1, 172-1, 738-1, 860-1, AND 874-1,  
BASED ON IMPROPER SECURED  
CLAIM AND IMPROPER ASSERTION  
OF A PRIORITY CLAIM BY A  
LANDLORD FOR A SECURITY  
DEPOSIT**

Date of Hearing: October 1, 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

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24 **NOTICE IS HEREBY GIVEN** that the *Trustee's Eleventh Omnibus Objection To*  
25 *Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure*  
26 *3007—Claim Numbers Claim Numbers 50-3, 56-1, 58-3, 63-1, 93-1, 96-1, 172-1, 738-1, 860-1,*  
27 *And 874-1, Based On Improper Secured Claim And Improper Assertion Of A Priority Claim By A*  
28 *Landlord For A Security Deposit (the “Objection”) was filed by Shelley D. Krohn, the Chapter 7*

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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.<sup>1</sup>

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

Claimant	Proof of Claim No.	Grounds for objection <sup>2</sup>
Chang, Hweichen Lily and Yin Fang Wang	860-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Chun, Karen	58-3	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Chun, Richard F.	50-3	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
HLST GLOBAL, LLC	63-1	Claim improperly asserts a secured claim with no evidence of security agreement, Claim

<sup>1</sup> 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”.

<sup>2</sup> Unless otherwise stated, page references are to the page within the Objection stating the legal argument for the objection.

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		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. 8-11.
Li, Qian Yan	874-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Lu, Xiang	738-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Quan, Bei	172-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Wang, Yiqun	56-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.
Wong, Jaimy	93-1	Claim improperly asserts a secured claim with no evidence of security agreement, Claim improperly asserts priority under 11 U.S.C. § 507(a)(7). This type of priority claim may not

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		be asserted by a landlord. <i>See</i> p. 8-11.
Xu, Michael and Leah	96-1	Claim improperly asserts a secured claim with no evidence of security agreement, 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. 8-11.

A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee’s Eleventh Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers Claim Numbers 50-3, 56-1, 58-3, 63-1, 93-1, 96-1, 172-1, 738-1, 860-1, And 874-1, Based On Improper Secured Claim And Improper Assertion Of A Priority Claim By A Landlord For A Security Deposit* 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 Motion 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](http://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).

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

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

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

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9 **NOTICE IS FURTHER GIVEN** that the hearing on said Motion will be held before a  
10 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Las  
11 Vegas, Nevada on October 1, 2020, at 9:30 a.m. The hearing on the Objection will take place in a  
12 courtroom designated on the day of the hearing. Due to the Coronavirus (Covid 19) pandemic,  
13 the Court may conduct a telephonic hearing on the Objection. Please visit the website for the U.S.  
14 Bankruptcy Court for the District of Nevada for updates on whether the Court will be conducting  
15 telephonic hearings: <https://www.nvb.uscourts.gov/coronavirus/>

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

19 Dated this 18th day of August, 2020.

20 **HOUAMAND LAW FIRM, LTD.**

21 By: /s/ Bradley G. Sims  
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