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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
THIRTEENTH OMNIBUS OBJECTION
TO PROOFS OF CLAIM PURSUANT TO
11 U.S.C. § 502(b)(1) AND FEDERAL
RULE OF BANKRUPTCY PROCEDURE
3007—CLAIM NUMBERS 919-1, 920-1,
927-1, 928-1, AND 931-1 – LATE FILED
CLAIMS**

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

NOTICE IS HEREBY GIVEN that the *Trustee's Thirteenth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 919-1, 920-1, 927-1, 928-1, and 931-1 – Late Filed Proofs of Claim* was filed by Shelley D. Krohn (the "Trustee"), the Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her counsel of record, Jacob L. Houmand, Esq. and Bradley G.

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1 Sims, Esq. of the Houmand Law Firm, Ltd.¹

2 The Objection seeks an order finding that the following claims are entitled only to receive
 3 a distribution pursuant to 11 U.S.C. § 726(a)(3) because they were untimely filed:

4 Claimant	Proof of Claim No.	Grounds for objection ²
5 Chiu, Lirong	920-1	Claim was filed after the deadline. <i>See</i> p. 5-6
6 Fleming III, Ernest	927-1	Claim was filed after the deadline. <i>See</i> p. 5-6
7 Guan, Zhuo Yun	928-1	Claim was filed after the deadline. <i>See</i> p. 5-6
8 Pensado, Frank and Joy	931-1	Claim was filed after the deadline. <i>See</i> p. 5-6
9 Qi, Bao Wen	919-1	Claim was filed after the deadline. <i>See</i> p. 5-6

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 11 A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee’s*
 12 *Thirteenth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And*
 13 *Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 919-1, 920-1, 927-1, 928-1, and*
 14 *931-1 – Late Filed Proofs of Claim* are on file with the Clerk’s Office of the United States
 15 Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies
 16 of the Motion and any supporting declarations may also be obtained from counsel for the Trustee
 17 or through the Bankruptcy Court’s website at www.nvb.uscourts.gov.

18 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief
 19 sought in the Objection, or if you want the Court to consider your reviews on the Objection, then
 20 you must file an opposition with the Court, and serve a copy of the person making the Objection
 21 ***no later than fourteen days before the hearing date.*** The opposition must state your position, set
 22
 23

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

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

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1 forth all relevant facts and legal authority, and be supported by affidavits or declarations that
2 conform to Local Rule 9014(c).

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

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

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

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

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

20 Dated this 18th day of August, 2020.

21 **HOUMAND LAW FIRM, LTD.**

22
23 By: /s/ Bradley G. Sims
24 Jacob L. Houmand, Esq. (NV Bar No. 12781)
25 Bradley G. Sims, Esq. (NV Bar No. 11713)
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