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*Electronically Filed On: August , 2020*

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

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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  
FOURTEENTH OMNIBUS OBJECTION  
TO PROOFS OF CLAIM PURSUANT TO  
11 U.S.C. § 502(b)(1) AND FEDERAL  
RULE OF BANKRUPTCY PROCEDURE  
3007—CLAIM NUMBERS 82-2, 105-1,  
108-1, 493-1, 677-1, 678-1, and 856-1  
BASED ON IMPROPER ASSERTION OF  
A PRIORITY CLAIM BY AN  
INDEPENDENT CONTRACTOR**

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

23 **NOTICE IS HEREBY GIVEN** that the *Trustee’s Fourteenth Omnibus Objection To*  
24 *Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure*  
25 *3007—Claim Numbers 82-2, 105-1, 108-1, 493-1, 677-1, 678-1, and 856-1 Based On Improper*  
26 *Assertion Of A Priority Claim by an Independent Contractor* (the “Objection”) was filed by  
27 Shelley D. Krohn (the “Trustee”), the Chapter 7 Trustee in the above-captioned bankruptcy case,  
28 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 and reclassify them as general unsecured claims:

Claimant	Proof of Claim No.	Grounds for objection <sup>2</sup>
Aloma Handyman Services	105-1	Claim improperly asserts priority claim. <i>See p.</i>
AMA AIR CORP	82-2	Claim improperly asserts priority claim. <i>See p.</i>
Delman, Jennifer	856-1	Claim improperly asserts priority claim. <i>See p.</i>
Diaz, Diego	678-1	Claim improperly asserts priority claim. <i>See p.</i>
F & R Home Maintenance & Services, Inc	493-1	Claim improperly asserts priority claim. <i>See p.</i>
Joe He, Inc.	677-1	Claim improperly asserts priority claim. <i>See p.</i>
Montejano, Norma Yolanda Teran	108-1	Claim improperly asserts priority claim. <i>See p.</i>

A copy of the Objection and the *Declaration of Shelley D. Krohn In Support of Trustee’s Fourteenth Omnibus Objection To Proofs Of Claim Pursuant To 11 U.S.C. § 502(B)(1) And Federal Rule Of Bankruptcy Procedure 3007—Claim Numbers 82-2, 105-1, 108-1, 493-1, 677-1, 678-1, and 856-1 Based On Improper Assertion Of A Priority Claim by an Independent Contractor* 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

<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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1 supporting declarations may also be obtained from counsel for the Trustee or through the  
2 Bankruptcy Court’s website at [www.nvb.uscourts.gov](http://www.nvb.uscourts.gov).

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

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

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

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

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

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