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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

DECLARATION OF PAUL M. HEALEY, CPA IN SUPPORT OF THIRD AND FINAL APPLICATION OF PAUL M. HEALEY & SONS CPAS, LTD. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED DURING THE PERIOD FROM FEBRUARY 13, 2015 THROUGH DECEMBER 31, 2020 AND FOR REIMBURSEMENT OF EXPENSES PURSUANT TO 11 U.S.C. §§ 330 AND 331 AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016

Date of Hearing: November 17, 2020
Time of Hearing: 9:30 a.m.
Place: To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

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23 I, Paul M. Healey, CPA, hereby declare as follows:

24 1. I am over the age of 18 and mentally competent. Except where stated on
25 information and belief, I have personal knowledge of the facts in this matter and if called upon to
26 testify, could and would do so.

27 2. I am a certified public accountant and the principal of Paul M. Healey & Sons
28 CPAs, Ltd. (the "Firm").

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1 3. I make this declaration to support the *Third and Final Application of Paul M.*
2 *Healey & Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During the*
3 *Period From February 13, 2015 Through December 31, 2020 and For Reimbursement of*
4 *Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016*
5 *(the “Fee Application”).*¹

6 4. The Fee Application concerns fees and expenses that were incurred in connection
7 with the above-captioned bankruptcy case during the period from February 13, 2015, through
8 December 31, 2020 (the “Fee Application Period”).

9 5. The Firm was previously awarded and paid professional fees and reimbursed
10 expenses on an interim basis in the amounts of \$4,025.00 and \$605.09, respectively (collectively,
11 the “Interim Compensation”).

12 6. The Firm requests an order: (i) approving and allowing additional compensation in
13 the amount of \$1,800.00 for the reasonable and necessary services of the Firm during the Fee
14 Application Period; (ii) approving on a final basis the Interim Compensation that was previously
15 approved by this Court and the additional fees incurred during the Fee Application Period; and
16 (iii) authorizing the Trustee to pay an additional \$1,800.00 to the Firm.

17 7. The services that the Firm rendered to the Trustee during the Fee Application
18 Period benefited the Debtor’s estate and that, therefore, the fees and expenses requested in the Fee
19 Application should be approved under Section 330(a).

20 8. I certify that (a) I have read the Fee Application; (b) to the best of my knowledge,
21 information and belief, formed after reasonable inquiry, the compensation and expense
22 reimbursement sought is in conformity with the Guidelines for Compensation and Expense
23 Reimbursement of Professionals and Trustees for the United States Bankruptcy Court, District of

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
28 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”.
Unless otherwise provided herein, all defined terms shall have the same meaning ascribed to them
in the Fee Application.

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1 Nevada (the “Guidelines”) except as specifically noted in the Fee Application; and (c) the
2 compensation and expense reimbursement requested are billed at rates, in accordance with
3 practices, no less favorable than those customarily employed by the Firm and generally accepted
4 by the clients of the Firm.

5 9. True and correct copies of the billing entries for the work performed by the Firm in
6 connection with the above-captioned bankruptcy case are attached hereto as **Exhibit “1”**.

7 10. I have reviewed the billing entries attached hereto as **Exhibit “1”** and the
8 narratives in the Fee Application describing the work performed by the Firm and believe that such
9 time sheets and narratives are true and correct in all material respects.

10 11. The Fee Application includes \$600.00 for the filing of a final tax return for the
11 Debtor, for the year of 2020.

12 12. The Firm was previously awarded fees in the amount of \$1,025.00 and
13 reimbursement of actual expenses in the amount of \$605.09 pursuant to the *Order Granting First*
14 *Interim Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for*
15 *Services Rendered During the Period From February 13, 2015 Through February 20, 2017 and*
16 *For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
17 *Bankruptcy Procedure 2016* (the “First Fee Application”).

18 13. The Firm was previously awarded fees in the amount of \$3,000.00 and
19 reimbursement of actual expenses in the amount of \$0.00 pursuant to the *Order Granting Second*
20 *Interim Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of Compensation for*
21 *Services Rendered During the Period From February 21, 2017 Through February 20, 2019 and*
22 *For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
23 *Bankruptcy Procedure 2016* (the “Second Fee Application”).

24 14. Except for those fees awarded in connection with the First Fee Application and the
25 Second Fee Application, the Firm has filed no previous requests for compensation and has not
26 received any payment on account of its services from the Trustee prior to the date hereof.

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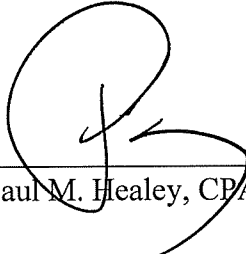
15. The Firm has not been paid or received any compensation from any source for the services described in the Fee Application. There are no agreements or understandings for the Firm to receive fees from any source other than the bankruptcy estate.

16. No agreement or understanding exists between the Firm and any other entity for the sharing of compensation received or to be received for services rendered in connection with this case, except as permitted under Section 504(b)(1).

17. Pursuant to Guideline 2.2.2 of the Region 17 United States Trustee Guidelines I sent a copy of the Fee Application, the billing entries itemization of expenses that are attached hereto as **Exhibit "1"** to the Trustee and she has approved the amounts requested in the Fee Application.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 19th day of October, 2020.



Paul M. Healey, CPA

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