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Electronically Filed On: October 20, 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 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 **NOTICE IS HEREBY GIVEN** that the *Third and Final Application of Paul M. Healey*
24 *& Sons CPAs, Ltd. for Allowance of Compensation for Services Rendered During the Period*
25 *From February 13, 2015 Through December 31, 2020 and For Reimbursement of Expenses*
26 *Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* was filed
27 by Jacob L. Houmand, Esq. and Bradley G. Sims, Esq. of the law firm of Houmand Law Firm,
28 Ltd., counsel of record for Shelley D. Krohn, the Chapter 7 Trustee in the above-captioned

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1 bankruptcy case (the “Fee Application”).

2 The Fee Application requests approval of compensation in favor of Paul M. Healey &
 3 Sons CPAs, Ltd. (the “Firm”), the certified public accountant employed by the Trustee in the
 4 above-captioned chapter 7 case. The Firm was previously awarded and paid professional fees and
 5 reimbursed expenses on an interim basis in the amounts of \$4,025.00 and \$605.09, respectively
 6 (collectively, the “Interim Compensation”). The Firm has incurred an additional \$1,800.00
 7 related to the preparation of bankruptcy estate tax returns for 2018, 2019, and 2020¹. The Firm
 8 requests an order: (i) approving and allowing additional compensation in the amount of \$1,800.00
 9 for the reasonable and necessary services of the Firm during the Fee Application Period; (ii)
 10 approving on a final basis the Interim Compensation that was previously approved by this Court
 11 and the additional fees incurred during the Fee Application Period; and (iii) authorizing the
 12 Trustee to pay an additional \$1,800.00 to the Firm. The Firm believes that the services it
 13 rendered to the Trustee during the Fee Application Period benefited the Debtor’s estate and that,
 14 therefore, the fees and costs requested in this Fee Application should be approved under Section
 15 330(a). The Trustee is currently holding funds in the amount of \$598,749.58.

16 A copy of the Fee Application, the *Declaration of Paul M. Healey, CPA In Support of*
 17 *Third and Final Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of*
 18 *Compensation for Services Rendered During the Period From February 13, 2015 Through*
 19 *December 31, 2020 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331*
 20 *and Federal Rule of Bankruptcy Procedure 2016*, and the *Declaration of Shelley D. Krohn In*
 21 *Support of Third and Final Application of Paul M. Healey & Sons CPAs, Ltd. for Allowance of*
 22 *Compensation for Services Rendered During the Period From February 13, 2015 Through*
 23 *December 31, 2020 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331*
 24 *and Federal Rule of Bankruptcy Procedure 2016* are on file with the Clerk’s Office of the United
 25 States Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101.

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 27 ¹ While the Firm has not prepared and filed a tax return for 2020 on behalf of the bankruptcy
 28 estate, this Fee Application requests compensation in the amount of \$600 for this tax return in
 order to limit administrative expenses related to the preparation and filing of an additional fee
 application.

1 Copies of the Fee Application and any supporting declarations may also be obtained from counsel
2 for the Trustee or through the Bankruptcy Court’s website at 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 Fee Application, or if you want the Court to consider your reviews on the Fee
5 Application, then you must file an opposition with the Court, and serve a copy of the person
6 making the Fee Application *no later than fourteen days before the hearing date*. The opposition
7 must state your position, set forth all relevant facts and legal authority, and be supported by
8 affidavits or declarations that 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.

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17 **NOTICE IS FURTHER GIVEN** that the hearing on said Fee Application will be held
18 before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd.
19 South, Las Vegas, Nevada on November 17, 2020, at 9:30 a.m. Due to the Coronavirus (Covid
20 19) pandemic, the Court will conduct a telephonic hearing on the Motion. Please check the
21 Bankruptcy Court’s website prior to the hearing for the call-in number, at:
22 <https://www.nvb.uscourts.gov/calendars/court-calendars/>.

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