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Electronically Filed On: October 20, 2020

Counsel for Shelley D. Krohn, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

AMERI-DREAM REALTY, LLC,

Debtor.

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

**DECLARATION OF SUSAN
PERSICILLI IN SUPPORT OF FIRST
AND FINAL APPLICATION OF EPIO
CLASS ACTION & CLAIMS
SOLUTIONS, INC., FORMERLY
KNOWN AS THE GARDEN CITY
GROUP, LLC FOR ALLOWANCE OF
COMPENSATION FOR SERVICES
RENDERED DURING THE PERIOD
FROM FEBRUARY 6, 2015 THROUGH
AUGUST 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: Courtroom No. To Be Determined
Foley Federal Building
300 Las Vegas Blvd., S.
Las Vegas, NV 89101

Judge: Honorable Gary Spraker

I, Susan Persichilli, declare as follows:

1. I am over the age of 18 years and I am competent to make this declaration. I have personal knowledge of the facts set forth herein, except for those facts stated on information and

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1 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I
2 could and would testify as to the matters set forth below based upon my personal knowledge.

3 2. I am an employee of Epiq Class Action & Claims Solutions, Inc., formerly known
4 as The Garden City Group, LLC ("GCG").

5 3. I make this declaration in support of the *Final Application of Epiq Class Action &*
6 *Claims Solutions, Inc., Formerly Known as The Garden City Group, LLC For Allowance of*
7 *Compensation for Services Rendered During the Period From February 6, 2015 Through August*
8 *31, 2020, And for Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal*
9 *Rule Of Bankruptcy Procedure 2016 (the "Fee Application").*¹

10 4. The Fee Application concerns professional fees and expenses that were incurred in
11 connection with the above-captioned bankruptcy case during the period from February 6, 2015
12 Through August 31, 2020, (the "Fee Application Period").

13 5. Since its employment, GCG has received \$140,714.16 for professional services
14 and reimbursement of expenses (collectively, the "Monthly Compensation").²

15 6. GCG has incurred \$26,595.18 in professional services and \$3,376.68 for expenses
16 (collectively, the "Unpaid Compensation")³ that have not been paid by the Trustee.

17 7. The Fee Applications requests an order: (i) approving and allowing on a final basis
18 the Monthly Compensation; and (ii) approving and allowing on a final basis professional fees in
19 the amount of \$26,595.18 and reimbursement of expenses in the amount of \$3,376.68 and
20 approval to pay the same to GCG.

21 ...

22
23 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
24 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
25 Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of
26 Bankruptcy Procedure will be referred to as "FRBP." Unless otherwise expressly stated herein,
27 all undefined, capitalized terms shall have the meaning ascribed to them in the Fee Application.

28 ² True and correct copies of the invoices related to the Monthly Compensation are attached to the
Persichilli Declaration as **Exhibit "1"**.

³ True and correct copies of the invoices related to the Unpaid Compensation are attached to the
Persichilli Declaration as **Exhibit "2"**.

1 ...

2 8. The services that GCG rendered to the Trustee during the Fee Application Period
3 benefited the Debtor's estate and that, therefore, the professional fees and expenses requested in
4 the Fee Application should be approved under Section 330(a).

5 9. I certify that (a) I have read the Fee Application; (b) to the best of my knowledge,
6 information and belief, formed after reasonable inquiry, the compensation and expense
7 reimbursement sought is in conformity with the Guidelines for Compensation and Expense
8 Reimbursement of Professionals and Trustees for the United States Bankruptcy Court, District of
9 Nevada (the "Guidelines") except as specifically noted in the Fee Application; and (c) the
10 compensation and expense reimbursement requested are billed at rates, in accordance with
11 practices, no less favorable than those customarily employed by GCG and generally accepted by
12 the clients of GCG.

13 10. True and correct copies of the invoices for the work performed by GCG in
14 connection with the above-captioned bankruptcy case are attached hereto as **Exhibits "1" and "2"**.

15 11. I have reviewed the invoices attached hereto as **Exhibits "1" and "2"** and believe
16 that to the best of my knowledge such invoices are true and correct in all material respects.

17 12. True and correct copies of the itemization of expenses for actual costs incurred by
18 GCG in connection with the above-captioned bankruptcy case during the Fee Application Period
19 are attached hereto as **Exhibits "1" and "2"**.

20 13. I have reviewed the itemization of expenses attached hereto as **Exhibits "1" and**
21 **"2"** and believe that to the best of my knowledge such reports are true and correct in all material
22 respects.

23 14. Except as set forth in the Fee Application, GCG has filed no previous requests for
24 compensation and has not received any payment on account of its services from the Trustee prior
25 to the date hereof.

26 15. GCG has not been paid or received any compensation from any source for services
27 rendered in connection with this case. There are no agreements or understandings for GCG to
28 receive fees from any source other than the bankruptcy estate.

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

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

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

11 Dated this 20th day of October, 2020.



Susan Persichilli