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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 SHELLEY D. KROHN 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

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25 I, Shelley D. Krohn, declare as follows:

26 1. I am over the age of 18 years and I am competent to make this declaration. I have  
27 personal knowledge of the facts set forth herein, except for those facts stated on information and  
28 belief and, as to those facts, I am informed and believe them to be true. If called as a witness, I

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1 could and would testify as to the matters set forth below based upon my personal knowledge.

2 2. I am the appointed Chapter 7 Trustee in the above-captioned bankruptcy case.

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

8 4. On January 9, 2015, Ameri-Dream Realty, LLC (the "Debtor") filed a voluntary  
9 bankruptcy pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1].<sup>2</sup>

10 5. On January 9, 2015, Victoria L. Nelson ("Trustee Nelson") was appointed as the  
11 Chapter 7 Trustee in the Debtor's bankruptcy case [ECF No. 4].

12 6. The Debtor was a real estate brokerage firm that represents clients in the  
13 purchase and sale of real property throughout Clark County, Nevada.

14 7. The Debtor also has a property management division that manages hundreds of  
15 rental properties for various landowners and tenants throughout Las Vegas, Nevada.

16 8. The mailing matrix currently consists of approximately Two Thousand Eight  
17 Hundred (2,800) creditors and/or parties in interest.

18 9. Trustee Nelson determined that she would require the assistance of a claims and  
19 noticing agent to manage claims received and to assist in large mailing projects.

20 10. On February 9, 2015, Trustee Nelson filed an *Application for Order Authorizing*  
21 *Employment of the Garden City Group, LLC As Claims and Noticing Agent* [ECF No. 88].

22 ...

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

28 <sup>2</sup> All references to "ECF No." are to the numbers assigned to the documents filed in the case as  
they appear on the docket maintained by the clerk of the court.

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1 11. On February 27, 2015, the Court entered an Order Granting Application for Order  
 2 Authorizing Employment of the Garden City Group, LLC As Claims and Noticing Agent [ECF  
 3 No. 128].

4 12. Since its employment, GCG has been maintaining the Proofs of Claim that have  
 5 been submitted by creditors.

6 13. On January 13, 2018, Trustee Nelson died.

7 14. On January 19, 2018, the Trustee was appointed as the successor Chapter 7 Trustee  
 8 in the Debtor's bankruptcy case.

9 15. In addition to maintaining the Proofs of Claims for the Bankruptcy Case, GCG has  
 10 assisted in multiple large mailing projects, including the mailing of several omnibus claim  
 11 objections.

12 16. To date, GCG has been paid the following amounts pursuant to the Employment  
 13 Order:

<u>Payment Date</u>	<u>Amount</u>	<u>Invoice Number</u>
November 16, 2015	\$2,006.64	19111
April 21, 2015	\$38,983.37	17900
May 14, 2015	\$12,783.06	18061
June 10, 2015	\$13,421.46	18275
August 12, 2015	\$35,173.07	18440
March 18, 2016	\$8,880.20	19679
June 21, 2016	\$2,178.34	20170
July 13, 2016	\$10,643.78	20417
August 24, 2016	\$1,768.78	20624
November 23, 2016	\$1,465.80	21081
January 31, 2018	\$8,160.00	22722
May 15, 2018	\$660.00	24352
August 16, 2018	\$2,539.66	24352
November 14, 2018	\$660.00	27741

1	May 22, 2019	\$1,390.00	27741
2	May 27, 2019	\$695.00	27741

3 True and correct copies of the invoices for the foregoing payments are attached as **Exhibit**  
4 “1” to the Persichilli Declaration.

5 17. The balance of the trust account in the Debtors bankruptcy case is \$598,749.58.

6 18. I believe that the work performed by the Firm benefitted the Debtor’s bankruptcy  
7 estate.

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

10 Dated this 20 day of October, 2020.

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12  
13 Shelley D. Krohn, Chapter 7 Trustee

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