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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

13 **NOTICE OF HEARING ON FIRST AND**
14 **FINAL APPLICATION OF EPIQ CLASS**
15 **ACTION & CLAIMS SOLUTIONS, INC.,**
16 **FORMERLY KNOWN AS THE GARDEN**
17 **CITY GROUP, LLC FOR ALLOWANCE**
18 **OF COMPENSATION FOR SERVICES**
19 **RENDERED DURING THE PERIOD**
20 **FROM FEBRUARY 6, 2015 THROUGH**
21 **AUGUST 31, 2020, AND FOR**
22 **REIMBURSEMENT OF EXPENSES**
23 **PURSUANT TO 11 U.S.C. §§ 330 AND 331**
24 **AND FEDERAL RULE OF**
25 **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

26 **NOTICE IS HEREBY GIVEN** that the *First and Final Application of Epiq Class Action*
27 *& Claims Solutions, Inc., Formerly Known as The Garden City Group, LLC For Allowance of*
28 *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

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1 *Rule Of Bankruptcy Procedure 2016* was filed by Jacob L. Houmand, Esq. and Bradley G. Sims,
2 Esq. of the law firm of Houmand Law Firm, Ltd., counsel of record for Shelley D. Krohn, the
3 Chapter 7 Trustee in the above-captioned bankruptcy case (the “Fee Application”).

4 The Fee Application is the First and Final Fee Application for Epiq Class Action &
5 Claims Solutions, Inc., formerly known as The Garden City Group, LLC (“GCG”) for services
6 rendered in the above captioned bankruptcy case (the “Bankruptcy Case”) during the period from
7 February 6, 2015 through August 31, 2020 (the “Fee Application Period”). On February 27,
8 2015, the Court entered an *Order Authorizing Employment of the Garden City Group, LLC As*
9 *Claims and Noticing Agent* [ECF No. 128] (the “Employment Order”) that authorized the
10 employment of GCG and provided as follows:

11 Without further order of the Court, the Trustee is authorized to
12 compensate GCG on a monthly basis in accordance with the terms
13 and conditions of the Engagement Agreement, upon GCG’s
14 submission to the Trustee of monthly invoices summarizing in
reasonable detail the services rendered and expenses incurred in
connection therewith.

15 *See* Employment Order, p. 3, ll. 1-4.

16 Since its employment, GCG has received \$140,714.16 for professional services and
17 reimbursement of expenses (collectively, the “Monthly Compensation”).¹ The GCG has incurred
18 \$26,595.18 in professional services and \$6,121.68 for expenses (collectively, the “Unpaid
19 Compensation”) ² that have not been paid by the Trustee. This Fee Applications requests an order:
20 (i) approving and allowing on a final basis the Monthly Compensation; and (ii) approving and
21 allowing on a final basis professional fees in the amount of \$26,595.18 and reimbursement of
22 expenses in the amount of \$6,121.68 and approval to pay the same to GCG. GCG believes that
23 the services it rendered to the Trustee during the Fee Application Period benefited the Debtor’s
24 estate and that, therefore, the fees and costs requested in this Fee Application should be approved

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26 ¹ True and correct copies of the invoices related to the Monthly Compensation are attached to the
27 Persichilli Declaration as **Exhibit “1”**.

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

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1 under Section 330(a). The balance of the trust account for the Debtor’s bankruptcy estate is
2 \$598,749.58.

3 The statutory basis for the approval of the fees and reimbursement of expenses sought in
4 the Fee Application are Sections 330 and 331 and FRBP 2016.

5 A copy of the Fee Application, the *Susan Persichilli In Support of First and Final*
6 *Application of Epiq Class Action & Claims Solutions, Inc., Formerly Known as The Garden City*
7 *Group, LLC For Allowance of Compensation for Services Rendered During the Period From*
8 *February 6, 2015 Through August 31, 2020, And for Reimbursement of Expenses Pursuant to 11*
9 *U.S.C. §§ 330 and 331 and Federal Rule Of Bankruptcy Procedure 2016, and the Declaration of*
10 *Shelley D. Krohn In Support of First and Final Application of Epiq Class Action & Claims*
11 *Solutions, Inc., Formerly Known as The Garden City Group, LLC For Allowance of*
12 *Compensation for Services Rendered During the Period From February 6, 2015 Through August*
13 *31, 2020, And for Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal*
14 *Rule Of Bankruptcy Procedure 2016* are on file with the Clerk’s Office of the United States
15 Bankruptcy Court, 300 Las Vegas Blvd. South, Fourth Floor, Las Vegas, Nevada 89101. Copies
16 of the Fee Application and any supporting declarations may also be obtained from counsel for the
17 Trustee or through the Bankruptcy Court’s website at www.nvb.uscourts.gov.

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

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

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

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

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

NOTICE IS FURTHER GIVEN that this hearing may be continued from time to time without further notice except for the announcement of any adjourned dates and times at the above-noted hearing or any adjournment thereof.

Dated this 20th day of October, 2020.

HOUAMAND LAW FIRM, LTD.

By: /s/ Bradley G. Sims
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