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Electronically Filed On: December 8, 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

**FOURTH AND FINAL APPLICATION
OF HOUMAND LAW FIRM, LTD. FOR
ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED DURING
THE PERIOD FROM JANUARY 13, 2015
THROUGH DECEMBER 1, 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: January 7, 2021
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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23 The Houmand Law Firm, Ltd. (the “Firm”), counsel of record for Shelley D. Krohn,
24 Chapter 7 Trustee in the above-captioned bankruptcy case (the “Trustee”), hereby submits its
25 *Fourth and Final Application of Houmand Law Firm, Ltd. for Allowance of Compensation for*
26 *Services Rendered During the Period From January 13, 2015 Through December 1, 2020 and*
27 *For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331 and Federal Rule of*
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1 *Bankruptcy Procedure 2016* (the “Fee Application”).¹

2 The Fee Application is filed pursuant to Sections 330 and 331, FRBP 2016, the Guidelines

3 for Compensation and Reimbursement of Professionals in Region 17 as promulgated by the

4 Offices of the United States Trustee (the “Region 17 Guidelines”), and the Guidelines for

5 Reviewing Applications for Compensation and Reimbursement on Expenses Filed Under 11

6 U.S.C. § 330 effective January 30, 1996 (the “U.S. Trustee Guidelines”). The Application is also

7 based on the following Memorandum of Points and Authorities, the *Declaration of Shelley D.*

8 *Krohn In Support of Fourth and Final Application of Houmand Law Firm, Ltd. for Allowance of*

9 *Compensation for Services Rendered During the Period From January 13, 2015 Through*

10 *December 1, 2020 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330 and 331*

11 *and Federal Rule of Bankruptcy Procedure 2016* (the “Trustee Declaration”), and the *Declaration*

12 *of Jacob L. Houmand, Esq. In Support of Fourth and Final Application of Houmand Law Firm,*

13 *Ltd. for Allowance of Compensation for Services Rendered During the Period From January 13,*

14 *2015 Through December 1, 2020 and For Reimbursement of Expenses Pursuant to 11 U.S.C. §§*

15 *330 and 331 and Federal Rule of Bankruptcy Procedure 2016* (the “Houmand Declaration”), both

16 of which are filed separately and concurrently with this Court pursuant to Local Rule 9014(c)(2).²

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24 ¹ 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.” The Local Rules of Practice for the United

28 States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

² 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.

1 The Fee Application is also based on the pleadings and papers on file herein and any
2 argument that may be entertained at the hearing on the Fee Application.³

3 Dated this 8th day of December, 2020.

4 **HOUAMAND LAW FIRM, LTD.**

5
6 By: */s/ Jacob L. Houmand*
7 Jacob L. Houmand, Esq. (NV Bar No. 12781)
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13
14 *Counsel for Shelley D. Krohn, Chapter 7 Trustee*

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28 ³ The Firm also requests that the Court take judicial notice of all pleadings filed in the above-referenced bankruptcy case, including adversary proceedings, pursuant to Rule of Evidence 201, incorporated by reference by FRBP 9017.

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BILLING SUMMARY

Prior Applications:

Fees

First Interim Fees Previously Requested	\$55,800.00
First Interim Fees Previously Awarded	\$55,800.00
Second Interim Fees Previously Requested	\$58,710.00
Second Interim Fees Previously Awarded	\$58,710.00
Third Interim Fees Previously Requested	\$71,307.50
Third Interim Fees Previously Awarded	\$71,307.50

Expenses

First Interim Expenses Previously Requested	\$1,986.88
First Interim Expenses Previously Awarded	\$1,986.88
Second Interim Expenses Previously Requested	\$1,937.08
Second Interim Expenses Previously Awarded	\$1,937.08
Third Interim Expenses Previously Requested	\$1,145.90
Third Interim Expenses Previously Awarded	\$1,145.90
Retainer Paid:	0.00
Drawn on Retainer:	0.00
Remaining Retainer:	0.00

Current Application Fees from December 5, 2016 through December 1, 2020 - Requested: \$115,657.50

Current Application Expenses Requested from December 5, 2016 through December 1, 2020 – Requested: \$1,033.62

**FOURTH AND FINAL FEE APPLICATION OF
HOUMAND LAW FIRM, LTD.
SUMMARY OF PROFESSIONALS
DECEMBER 5, 2016 THROUGH DECEMBER 1, 2020**

	NAME	GRADUATION FROM LAW SCHOOL	TITLE	HOURLY RATE	HOURS	TOTAL FEE
6	Jacob L. Houmand	2011	Partner	\$375.00	18.1	\$6,787.50
7	Jacob L. Houmand	2011	Partner	\$350.00	40.9	\$14,315.00
8	Jacob L. Houmand	2011	Partner	\$325.00	17.6	\$5,720.00
9	Bradley G. Sims	2009	Associate	\$350.00	219.3	\$76,755.00
10	Kyle J. Ortiz	2016	Associate	\$300.00	0.4	\$120.00
11	Kyle J. Ortiz	2016	Associate	\$275.00	13.4	\$3,685.00
12	Kyle J. Ortiz	2016	Associate	\$250.00	33.1	\$8,275.00
19	TOTAL					\$115,657.50

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**FIRST AND FINAL FEE APPLICATION OF
HOUMAND LAW FIRM, LTD.
SUMMARY OF COMPENSATION REQUESTED BY TASK CODE
DECEMBER 5, 2016 THROUGH DECEMBER 1, 2020**

ACTIVITY	HOURS	FEES
B110 – CASE ADMINISTRATION	22.6	\$7,297.50
B120 – ASSET ANALYSIS & RECOVERY	1.0	\$350.00
B150 – MEETINGS AND COMMUNICATIONS	3.0	\$890.00
B160 – EMPLOYMENT/FEE APPLICATIONS	37.9	\$12,942.50
B190 – OTHER CONTESTED MATTERS	9.5	\$3,185.00
B310 – CLAIMS ADMINISTRATION & OBJECTIONS	268.8	\$90,992.50
TOTAL:	342.8	\$115,657.50

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MEMORANDUM OF POINTS AND AUTHORITIES

I.

INTRODUCTION

The Firm, counsel of record to the Trustee in the above-captioned chapter 7 case (the “Bankruptcy Case”), hereby submits this Fourth and Final Fee Application for services rendered in the Bankruptcy Case during the period from January 13, 2015, through December 1, 2020. The Firm has been awarded and paid attorneys’ fees and expenses in the amounts of \$185,817.50 and \$5,069.86, respectively, on an interim basis (collectively, the “Interim Compensation”). The Firm has incurred attorneys’ fees and expenses in the amount of \$115,657.50 and \$1,033.62 for the period from December 5, 2016 through December 1, 2020 (the “Fee Application Period”).

The Firm requests an order: (i) approving and allowing the Interim Compensation on a final basis compensation; and (ii) approving and allowing attorneys’ fees and expenses in the amounts of \$115,657.50 and \$1,033.62, respectively, incurred during the Fee Application Period on a final basis and authorizing the Trustee to pay such amounts to the Firm. The Firm believes that the services it rendered to the Trustee during the Fee Application Period benefited the Debtor’s estate and that, therefore, the attorneys’ fees and costs requested in this Fee Application should be approved under Section 330(a). The Trustee is currently holding funds in the amount of \$598,749.58.

II.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1134. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). The statutory basis for the relief sought are Sections 330, FRBP 2016, and Local Rule 2016. Venue before this Court is appropriate under 28 U.S.C. §§ 1408 and 1409.

2. This matter constitutes a core proceeding under 28 U.S.C. § 157(b)(2). Pursuant to Local Rule 9014.2, if the Court determines that absent consent of the parties the Court cannot enter final orders or judgment regarding the Application consistent with Article III of the United States Constitution, the Firm consents to entry of final orders and judgment by this Court.

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1 **III.**

2 **SUMMARY OF PROFESSIONAL SERVICES PERFORMED**

3 3. The Firm has provided services in the matters as described below.

4 4. The following summary is intended only to highlight a number of the services
5 rendered by the Firm, and it is not meant to be a detailed description of all of the work performed.
6 Detailed descriptions of day-to-day services provided by the Firm and the time expended
7 performing such services is fully set forth in the billing summary, true and correct copies of which
8 are attached to the Houmand Declaration as **Exhibit “1”**.

9 5. Detailed descriptions of the actual expenses incurred by the Firm during the Fee
10 Application Period are attached to the Houmand Declaration as **Exhibit “1”**.

11 **IV.**

12 **STATEMENT REGARDING NOTICE**

13 6. On February 20, 2015, an *Order Granting Application for Order Limiting Notice*
14 *and Memorandum of Points and Authorities In Support Thereof* [ECF No. 121] granting the
15 Trustee’s request that whenever the Bankruptcy Rules or Local rules require notice to be given to
16 all creditors, including Bankruptcy Rule 2002(a), (b) and (f), service shall be made only upon the
17 parties on the Official Service List which consists of the Debtor’s counsel, the United States
18 Trustee, and any party requesting notice by the party’s filing of a notice of appearance and request
19 for notice.

20 7. Notice of hearing on the Fee Application, identifying the Firm and amounts
21 requested, has been served on all identified creditors and parties in interest not less than 28 days
22 prior to the date set for hearing on this Fee Application.

23 **V.**

24 **STATEMENT REGARDING TERMS AND CONDITIONS OF EMPLOYMENT**

25 8. On February 2, 2015, the Trustee filed an *Application to Employ Nelson &*
26 *Houmand, P.C., Nunc Pro Tunc, As General Bankruptcy Counsel for Victoria L. Nelson, Chapter*
27 *7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy Procedure*
28 *2014* [ECF No. 16] (the “Employment Application”).

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1 9. The Employment Application sought to employ the law firm of Nelson &
2 Houmand, P.C. *nunc pro tunc* as of January 13, 2015.

3 10. On April 2, 2015, the Court entered an *Order Granting the Application to Employ*
4 *Nelson & Houmand, P.C., Nunc Pro Tunc, As General Bankruptcy Counsel for Victoria L.*
5 *Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of*
6 *Bankruptcy Procedure 2014* [ECF No. 148].

7 11. On October 17, 2017, the Firm filed a *Notice of (1) Change of Firm Name and (2)*
8 *Change of Address* [ECF No. 264] that stated the name of the Firm had changed from “Nelson &
9 Houmand, P.C.” to the “Houmand Law Firm, Ltd.”.

10 12. On January 13, 2018, Trustee Nelson died.

11 13. On January 19, 2018, the Trustee was appointed as the successor Chapter 7 Trustee
12 in the Debtor’s bankruptcy case.

13 14. On March 19, 2018, the Trustee filed an *Ex Parte Application to Employ Houmand*
14 *Law Firm, Ltd., Nunc Pro Tunc, As General Bankruptcy Counsel for Shelley D. Krohn, Successor*
15 *Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal Rule of Bankruptcy*
16 *Procedure 2014* [ECF No. 268].

17 15. On March 19, 2018, the Court entered an *Order Granting Ex Parte Application to*
18 *Employ Houmand Law Firm, Ltd., Nunc Pro Tunc, As General Bankruptcy Counsel for Shelley D.*
19 *Krohn, Successor Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Federal*
20 *Rule of Bankruptcy Procedure 2014* [ECF No. 272].

21 16. The scope of the Firm’s employment in this bankruptcy case was as follows:

22 (a) To investigate the financial affairs of the Debtor and
23 determine if there are any preferential transfers, fraudulent
24 conveyances, or turnover actions that may be filed on behalf
 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
 547, and 548.

25 (b) To prosecute any and all preferential transfers, fraudulent
26 conveyances, or turnover actions that may be filed on behalf
27 of the bankruptcy estate pursuant to 11 U.S.C. §§ 542, 544,
 547, and 548.

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- (c) To advise the Trustee of her rights and obligations and performance of her duties during the administration of this bankruptcy case;
- (d) To represent the Trustee in all proceedings before this Court and any other court which assumes jurisdiction of a matter related to or arising in this bankruptcy case;
- (e) To assist the Trustee in developing legal positions and strategies with respect to all facets of these proceedings; and
- (f) To provide such other counsel and advice as the Trustee may require in connection with this bankruptcy case.

17. The results achieved during the Fee Application Period encompassed by this Fee Application relate to the scope of employment set forth in this Fee Application and are set forth in more specific detail in the billing entries attached as **Exhibit "1"** to the Houmand Declaration.

18. The actual expenses incurred by the Firm during the Fee Application Period are set forth in more specific detail in the billing entries attached as **Exhibit "1"** to the Houmand Declaration.

19. During the time in question, the Firm has assisted the Trustee in those items detailed in the "Scope of Employment" of the Employment Application and other miscellaneous functions.

20. The Firm's services were rendered economically and without unnecessary duplication of efforts. In addition, the work involved, and thus the time expended, was carefully assigned in consideration of the experience and expertise required for each particular task. If more than one person attended a meeting or hearing, it was not a duplication of that effort but it was necessary to adequately represent the interests of the Trustee.

VI.

**STATEMENT REGARDING THE ADMINISTRATION OF THE DEBTOR'S
BANKRUPTCY ESTATE**

21. The Debtor was a real estate brokerage firm that represented clients in the purchase and sale of real property throughout Clark County, Nevada.

22. The Debtor also had a property management division that managed over one thousand rental properties for various landowners and tenants throughout Las Vegas, Nevada.

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1 23. Subsequent to the filing of the Debtor’s bankruptcy case, Trustee Nelson was
2 informed by John Brown, the principal of the Debtor and then-spouse of Elsie Peladas-Brown,
3 that it was his belief that Elsie Peladas-Brown had embezzled approximately One Million Two
4 Hundred Thousand Dollars (\$1,200,000) from the Security Deposits Trust Account of the Debtor
5 and wired these monies to the Philippines between the period of March, 2013 through December,
6 2013.

7 24. It is the belief of John Brown that Elsie Peladas-Brown left the United States for
8 the Philippines in January, 2014, and has not returned to the United States since that time.

9 **THE DEBTOR’S BANKRUPTCY FILING**

10 25. On January 9, 2015, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7
11 of Title 11 of the United States Code (Case No. BK-S-14-12346-ABL) in the United States
12 Bankruptcy Court for the District of Nevada (the “Bankruptcy Case”).

13 26. On January 9, 2015, Trustee Nelson was appointed as the Chapter 7 Trustee in the
14 Bankruptcy Case.

15 27. Shortly following her appointment, Trustee Nelson met with Debtor’s principal
16 and it’s counsel to discuss matters requiring immediate attention including the securing and
17 closing of a 4,861 square foot commercial property located at 4875 West Nevso Drive, Las
18 Vegas, NV, and the administration of approximately Seven Hundred Seven Thousand Dollars
19 (\$707,000) of funds identified as security deposits which were those portion of funds which were
20 not embezzled and placed into the IOLTA bank account of Debtor’s bankruptcy counsel.

21 28. Trustee Nelson was also tasked with identifying and closing residential sales of
22 real property which contracts had been entered into pre-petition but closed after the bankruptcy
23 was filed by the Debtor.

24 29. After her appointment, Trustee Nelson sought and obtained Court approval for the
25 turnover of the approximately Seven Hundred Seven Thousand Dollars (\$707,000) of funds
26 identified as security deposits which were those portion of funds which were not embezzled and
27 placed into the IOLTA bank account of Debtor’s bankruptcy counsel.

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1 30. Due to the fact that the Debtor’s bankruptcy case was deemed a mega case, Trustee
2 Nelson sought and obtained court approval to employ Garden City Group, LLC (“GCG”) as the
3 claims and noticing agent.

4 31. Upon the expiration of the May 14, 2015, deadline to file proofs of claims, GCG
5 filed the proof of claims with the Court.

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

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

9 34. Over 900 proof of claims were filed with the Court totaling \$2,497,635.38 in
10 calculated claim value.

11 35. Upon a review and analysis of the claims, the Trustee discovered a multitude of
12 issues related to the proofs of claim that were filed in the Debtor’s bankruptcy case.

13 36. Specifically, there were duplication of claims wherein both the landlord and the
14 corresponding tenant have filed proofs of claims seeking the same security deposit and or/ various
15 other funds collected and held either for the tenant or the landlord in the Debtor’s Security
16 Deposits Trust Account.

17 37. The Trustee also discovered numerous claims wherein landlords improperly
18 claimed priority under § 507(a)(7), and realtors are claiming a priority in excess of the maximum
19 amount allowed under § 507(a)(4).

20 38. The Firm filed fourteen omnibus objections to proofs of claims, as well as
21 additional objections to individual proofs of claims in an effort to ensure correct distribution to
22 creditors in accordance with the bankruptcy code.

23 39. Trustee Nelson also employed the law firm Schwartz Flansburg, PLLC to pursue
24 the recovery of funds embezzled by Elsie Peladas-Brown.

25 40. Since the employment of Schwartz Flansburg, PLLC, a summary judgment was
26 obtained against Elsie Peladas-Brown for the embezzlement of the \$1.2 million from the Security
27 Deposits Trust Account of the Debtor and a second adversary action was filed against the insurers
28 of the errors and omissions insurance policy held by the Debtor.

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VII.

STATEMENT OF STATUTORY AUTHORITY FOR RELIEF SOUGHT

41. 11 U.S.C. Section 330(a) states:

(a)(1) After notice to the parties in interest and the United States trustee and a hearing, and subject to sections 326, 328 and 329 the court may award to a trustee, an examiner, a professional person employed under section 327 or 1103.

(A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) Reimbursement for actual, necessary expenses.

42. 11 U.S.C. Section 503 states, in relevant part:

(a) An entity may timely file a request for payment of an administrative expense, . . .

(b) After notice and a hearing, there shall be allowed administrative expenses, . . . including –

(2) compensation and reimbursement awarded under Section 330(a) of this title.

43. 11 U.S.C. Section 331 authorizes the application for and payment of compensation or reimbursement as follows:

A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title. After notice and a hearing, the court may allow and disburse such compensation or reimbursement.

44. This Fee Application is brought pursuant to 11 U.S.C. Sections 330(a), 331 and 503(b) and Region 17 Guidelines Subsection (b).

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VIII.

STATEMENT RE: AMOUNT OF COMPENSATION SOUGHT TO BE ALLOWED

This Fee Application seeks allowance of compensation as follows: (a) \$115,657.50 for professional services rendered during the Fee Application Period; (b) reimbursement of actual expenses in the amount of \$1,033.62 incurred by the Firm during the Fee Application Period; and (c) final approval of the Interim Compensation.

IX.

**STATEMENT REGARDING SERVICES RENDERED, HOURLY RATES,
AND EXPENSES INCURRED**

45. Services rendered by Applicant are set forth in detail in the billing entries attached as **Exhibit “1”** to the Houmand Declaration. The billing entries attached as **Exhibit “1”** to the Houmand Declaration reflect the tasks and includes a detailed list of all time for which compensation is sought, including date of service, designation of category of person rendering service and hourly billing rate, and description of time spent and tasks performed. *See* “Guidelines” subsection (b)(4); Bankruptcy Rule 2016(a)(1).

46. Actual expenses incurred by the Firm during the Fee Application Period are attached as **Exhibit “1”** to the Houmand Declaration.

47. No unusual or costly expenses are listed above.

48. The Firm has charged customary rates for fees which are allowed by attorneys in this area pursuant to 11 U.S.C. § 330.

49. The Firm is not employed on a contingency basis and, as in all bankruptcy proceedings, the fees charged are subject to the discretion of the Court.

50. For the convenience of the Court, the U.S. Trustee, and all interested parties, the following paragraphs set forth a narrative statement, summary and explanation of certain activities and services performed during the time covered by the Fee Application Period. The Firm expended a total of 342.8 hours in providing services on behalf of the Trustee in the Bankruptcy Case over a period of approximately four years. To provide an orderly and meaningful summary of the services rendered by the Firm in accordance with applicable law and

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1 guidelines the Firm utilized the following separate project billing categories in the Fee
2 Application Period to provide a breakdown of the time expended:

3 B110 – Case Administration. The entries in this category relate to the work performed
4 pertaining to operational and administrative matters including communications with various
5 creditors, counsel for Debtor, and interested parties and their counsel on an on-going day-to-day
6 basis. The time entries in this category also concerned the preparation of memorandum updating
7 the Chapter 7 Trustee on the administration of the Debtor’s bankruptcy case. The Firm expended
8 22.6 hours and spent \$7,297.50 for this category.

9 B120 – Asset Analysis & Recovery. The entries in this category relate to the investigation
10 and analysis of the potential recovery of assets for ultimate distribution to the unsecured creditors
11 of the Debtor’s bankruptcy estate. The Firm expended 1.0 hours and spent \$350.00 for this
12 category.

13 B150 – Meetings and Communications. The entries in this category include
14 communications with creditors regarding the administration of the Debtor’s bankruptcy case
15 objections to proofs of claim. The Firm expended 3.0 hours and spent \$890.00 for this category.

16 B160 – Preparation of Fee/Employment Applications. The entries in this category relate
17 to the preparation of fee applications for the Firm, an accountant employed by the Trustee, and
18 GCG. The Firm expended 37.9 hours and spent \$12,942.50 for this category.

19 B190 – Other Contested Matters. The time entries in this category concerned work
20 performed related to the litigation against Elsie Peladas-Brown and insurance company. The
21 Firm expended 9.5 hours and spent \$3,185.00 for this category.

22 B310 – Claims Administration & Objections. The entries in this category relate to the
23 review, analysis, and objection to the proof of claims filed with the Court. The Firm reviewed
24 over nine hundred proofs of claim and filed fourteen omnibus objections. The Firm expended
25 268.8 hours and spent \$90,992.50 for this category.

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X.

STATEMENT REGARDING EXPERTISE REQUIRED

51. The Firm is skilled in insolvency proceedings and Chapter 7 Trustee cases and has special knowledge which enabled the Firm to perform services of benefit to the Trustee. Specialized knowledge and skills with respect to insolvency practice, and procedure and law are required to handle the problems which arise in the bankruptcy context.

XI.

**STATEMENT REGARDING PAYMENTS MADE OR PROMISED
AND AGREEMENTS TO SHARE COMPENSATION**

52. No payments have been made or promised to the Firm for services rendered or to be rendered in connection with this case, other than those payments described in this Fee Application.

53. 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). *See* Houmand Declaration.

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HOUAMAND LAW FIRM, LTD.
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XII.

CONCLUSION

WHEREFORE, the Firm respectfully requests that this Court enter an Order: (a) granting this Fee Application; (b) approving and allowing the Interim Compensation on a final basis; and (c) approving and allowing attorneys’ fees and expenses in the amounts of \$115,657.50 and \$1,033.62, respectively, on a final basis and authorizing the Trustee to pay such amounts to the Firm; and (d) for such other relief as is such and proper.

Dated this 8th day of December, 2020.

HOUAMAND LAW FIRM, LTD.

By: */s/ Jacob L. Houmand*
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Counsel for Shelley D. Krohn, Chapter 7 Trustee