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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

DECLARATION OF JACOB L. HOUMAND, ESQ. IN SUPPORT OF 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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24 I, Jacob L. Houmand, declare as follows:

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

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1 2. I am an attorney licensed to practice law in the State of Nevada and admitted to
2 practice before this Court. I am a shareholder with the law firm of Houmand Law Firm, Ltd. (the
3 “Firm”).

4 3. I make this declaration in support of the *Fourth and Final Application of Houmand*
5 *Law Firm, Ltd. for Allowance of Compensation for Services Rendered During the Period From*
6 *January 13, 2015 Through December 1, 2020 and For Reimbursement of Expenses Pursuant to*
7 *11 U.S.C. §§ 330 and 331 and Federal Rule of Bankruptcy Procedure 2016* (the “Fee
8 Application”).¹

9 4. The Fee Application concerns attorneys’ fees and expenses that were incurred in
10 connection with the above-captioned bankruptcy case during the period January 13, 2015
11 Through December 2, 2020 (the “Fee Application Period”).

12 5. The Firm has been awarded and paid attorneys’ fees and expenses in the amounts
13 of \$185,817.50 and \$5,069.86, respectively, on an interim basis (collectively, the “Interim
14 Compensation”).

15 6. The Firm has incurred attorneys’ fees and expenses in the amount of \$115,657.50
16 and \$1,033.62 for the period from December 5, 2016 through December 1, 2020 (the “Fee
17 Application Period”).

18 7. The Fee Application requests an order (i) approving and allowing the Interim
19 Compensation on a final basis compensation; and (ii) approving and allowing attorneys’ fees and
20 expenses in the amounts of \$115,657.50 and \$1,033.62, respectively, incurred during the Fee
21 Application Period on a final basis and authorizing the Trustee to pay such amounts to the Firm.

22 8. The services that the Firm rendered to the Trustee during the Fee Application
23 Period benefited the Debtor’s estate and that, therefore, the attorneys’ fees and expenses requested
24 in the Fee Application should be approved under Section 330(a).

25 _____
26 ¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11
27 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The
28 Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of
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.

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

9 10. True and correct copies of the billing entries for the work performed by the Firm in
10 connection with the above-captioned bankruptcy case are attached hereto as **Exhibit “1”**.

11 11. I have reviewed the billing entries attached hereto as **Exhibit “1”** and the
12 narratives in the Fee Application describing the work performed by the Firm and believe that such
13 time sheets and narratives are true and correct in all material respects.

14 12. True and correct copies of the itemization of expenses for actual costs incurred by
15 the Firm in connection with the above-captioned bankruptcy case during the Fee Application
16 Period are attached hereto as **Exhibit “1”**.

17 13. I have reviewed the itemization of expenses attached hereto as **Exhibit “1”** and
18 believe that such reports are true and correct in all material respects.

19 14. The Firm has not been paid or received any compensation from any source for
20 services rendered in connection with this case other than from the Trustee. There are no
21 agreements or understandings for the Firm to receive fees from any source other than the
22 bankruptcy estate.

23 15. No agreement or understanding exists between the Firm and any other entity for
24 the sharing of compensation received or to be received for services rendered in connection with
25 this case, except as permitted under Section 504(b)(1).

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