

1 STEVEN T. GUBNER – NV Bar No. 4624
 SUSAN K. SEFLIN – CA Bar No. 213865 – *Pro Hac Vice* Pending
 2 JESSICA WELLINGTON – CA Bar No. 324477 – *Pro Hac Vice* Pending
 BG LAW LLP
 3 300 S. 4th Street, Suite 1550
 Las Vegas, NV 89101
 4 Telephone: (702) 835-0800
 Facsimile: (866) 995-0215
 5 Email: sgubner@bg.law
 sseflin@bg.law
 6 jwellington@bg.law

7 Proposed Attorneys for Chapter 11 Debtor
 and Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**
 9 **DISTRICT OF NEVADA**

11
 12 In re
 13 Front Sight Management LLC,

Case No. 22-11824-abl
 chapter 11

Hearing Date: May 27, 2022
Hearing Time: 9:30 a.m.

14
 15
 16
 17 **NOTICE OF HEARINGS ON DEBTOR’S FIRST DAY EMERGENCY MOTIONS**

18
 19 **PLEASE TAKE NOTICE** that on May 24, 2022, Front Sight Management LLC, the
 20 chapter 11 debtor in possession herein (the “Debtor”), filed a voluntary petition for relief under
 21 chapter 11 of the Bankruptcy Code. In connection with the Debtor’s bankruptcy filing, the
 22 Bankruptcy Court entered its *Notice of Hearing and Order Shortening Time to Hear the Debtor’s*
 23 *First Day Emergency Motions* [Doc. #24] (the “OST”) on May 25, 2022.

24 **PLEASE TAKE FURTHER NOTICE** that pursuant to the OST, an emergency hearing
 25 (“Emergency Hearing”) on the First Day Emergency Motions (defined below) will be held before
 26 the Honorable August B. Landis, Chief United States Bankruptcy Judge for the District of Nevada,
 27 on **May 27, 2022 at 9:30 a.m.** Parties wishing to appear and participate at the Emergency Hearing
 28 shall call the toll-free conference line at **(888) 684-8852 (Access Code: 8242009#)** at least ten (10)

1 minutes before the start of the Emergency Hearing.

2 **PLEASE TAKE FURTHER NOTICE** that any opposition(s) to the First Day Emergency
3 Motions may be filed in advance and served on required notice parties and/or may be presented
4 orally at the Emergency Hearing.

5 **PLEASE TAKE FURTHER NOTICE** that copies of the First Day Emergency Motions are
6 available for free at the following website: www.cases.stretto.com/frontsight. Copies of the First
7 Day Emergency Motions may also be obtained by contacting the Debtor's proposed reorganization
8 counsel, BG Law LLP, Attn: Susan K. Sefflin via email at ssefflin@bg.law.

9 **PLEASE TAKE FURTHER NOTICE** that the "First Day Emergency Motions" are as
10 follows:

11 1. *Emergency Motion for Order Extending Time to File Bankruptcy Schedules and*
12 *Statement of Financial Affairs* [Doc. #8];

13 2. *Emergency Motion for Order (I) Authorizing the Establishment of Certain Noticing*
14 *Procedures; (II) Establishing Bar Dates and Procedures for Filing Proofs of Claim; and (III)*
15 *Authorizing the Debtor to Keep Its Member List Confidential* [Doc. #6];

16 3. *Emergency Motion For Order Authorizing Maintenance Of Certain Prepetition Bank*
17 *Accounts And Merchant Accounts And Cash Management System* [DOC. #7];

18 4. *Emergency Motion for Entry of an Order: (1) Authorizing, But Not Requiring, Debtor*
19 *To Pay Or Honor (A) Prepetition Wages, Salaries, And Other Compensation Including*
20 *Reimbursement Of Expenses And (B) Prepetition Medical, Workers' Compensation, Paid Time Off,*
21 *And Similar Benefits; And (2) Authorizing And Directing Applicable Banks And Other Financial*
22 *Institutions To Receive, Process, Honor, And Pay Checks Presented For Payment And To Honor*
23 *Fund Transfer Requests* [DOC. #9];

24 5. *Emergency Application for the Entry of an Order Authorizing the Debtor to Employ and*
25 *Retain Stretto as Claims, Noticing and Solicitation Agent* [Doc. #10];

26 6. *Emergency Motion for Entry of Interim and Final Orders: (1) Authorizing Debtor to*
27 *Obtain Post-Petition Financing, (II) Granting Priming Liens and Administrative Expense Claims,*
28 *(III) Authorizing the Debtor's Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V)*

1 *Granting Related Relief* [Doc. #4];

2 7. *Emergency Motion For Entry Of An Order Authorizing The Debtor To Honor And*
3 *Continue Certain Customer Programs And Customer Obligations In The Ordinary Course Of*
4 *Business* [Doc. #13]; and

5 8. *Debtor's Emergency Motion for Order Authorizing Debtor to Pay Critical Vendors and*
6 *Certain Prepetition Tax Liabilities* [Doc. #12].

7 DATED: May 25, 2022

BG LAW LLP

8
9 By: /s/ Susan K. Seflin
10 Steven T. Gubner
11 Susan K. Seflin
12 Jessica Wellington
13 Proposed Attorneys for Chapter 11
14 Debtor and Debtor in Possession
15
16
17
18
19
20
21
22
23
24
25
26
27
28