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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:
FRONT SIGHT MANAGEMENT LLC,

Debtor.

FRONT SIGHT MANAGEMENT LLC, a
Nevada limited liability company,

v.
LAS VEGAS DEVELOPMENT FUND LLC, a
Nevada limited liability company, et al.

And all related counterclaims.

Case No. 22-11824-abl
Chapter 11

Adv. No. 22-01116-abl

**EX PARTE APPLICATION FOR ORDER
SHORTENING TIME FOR HEARING ON
MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS TO INTERVENE UNDER
BANKRUPTCY RULE 7024**

Hearing Date: N/A
Hearing Time: N/A

The Official Committee of Unsecured Creditors (the “Committee”), by and through its proposed Nevada counsel, the law firm of Carlyon Cica Chtd., and its proposed lead counsel, Kelly Drye & Warren LLP, hereby submits its *Ex Parte* Application (the “Application”) for the Court to shorten the time to hear Motion of the Official Committee of Unsecured Creditors to Intervene Under Bankruptcy Rule 7024 (the “Motion to Intervene”). This Application is made and based upon Rule

1 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 9006 of the
2 Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the District of
3 Nevada (the “Local Rules”), the Declaration of Tracy M. O’Steen filed in support of the Application
4 and contemporaneously herewith (the “O’Steen Declaration”), the Attorney Information Sheet
5 required by the Local Rules, the points and authorities set forth below, and the papers and pleadings
6 on file herein and in the main bankruptcy case, judicial notice of which is respectfully requested
7 pursuant to FRE 201.

8 **I. LEGAL AUTHORITY**

9 Bankruptcy Rule 9006(c)(1) permits a Bankruptcy Court for cause shown, and in its
10 discretion, to reduce the period during which any notice is given. Bankruptcy Rule 9006(c)(1)
11 provides as follows:

12 Except as provided in paragraph (2) of this subdivision, when an act is required or allowed
13 to be done at or within a specified time by these rules or by a notice given thereunder or by
14 order of court, the court for cause shown may in its discretion with or without motion or
notice order the period reduced.

15 Local Rule 9006 provides further authority for shortening the time for a hearing. Local Rule 9006(a)
16 requires that every motion for an order shortening time must be accompanied by an affidavit stating
17 the reasons for an expedited hearing. Local Rule 9006 also requires the moving party to submit an
18 Attorney Information Sheet indicating whether opposing counsel was provided with notice, whether
19 opposing counsel consented to the hearing on an order shortening time, the date counsel was
20 provided with notice and how notice was provided or attempted to be provided. An Attorney
21 Information Sheet was filed contemporaneously with this Application, indicating other counsels’
22 position with respect to the hearing of the Motion to Intervene on shortened time.

23 The Application seeks an order shortening time to hear the Committee’s Motion to Intervene
24 in this adversary case to the same time set for hearing the Motion to Remand, filed by Las Vegas
25 Development Fund LLC (“LVDF”) which is July 25, 2022 at 9:30 a.m. If the Motion to Intervene
26 is heard in the ordinary course the hearing on the Motion to Remand will be held before the
27 Committee has an opportunity to present its objections to remand to the Court. The Committee
28

1 respectfully requests that the Court shorten the notice required for the hearing on the Motion to
2 Intervene so that it can be heard on July 25, 2022 at the time the Motion to Remand is set for hearing.

3 **II. CONCLUSION**

4 Debtors respectfully request that the Court grant this Application and issue an order
5 shortening the time and for any further relief this Court deems just and proper.

6 Respectfully submitted this 11th day of July 2022.

7 **CARLYON CICA CHTD.**

8 By: /s/ Tracy M. O'Steen, Esq.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court which sent e-mail notification of such filing to all CM/ECF participants in this case as indicated on the service list on July 11, 2022.

/s/ Cristina Robertson
Cristina Robertson