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16 *VNV Dynasty Trust I, and VNV Dynasty Trust II*

17 **UNITED STATES BANKRUPTCY COURT**
18 **FOR THE DISTRICT OF NEVADA**

19 In re:
20 FRONT SIGHT MANAGEMENT LLC,
21 Debtor.

22 Case No.: 22-11824-ABL
23 Chapter 11

24 FRONT SIGHT MANAGEMENT, LLC, A
25 NEVADA LIMITED LIABILITY COMPANY
26 Plaintiff,

27 Adv. Case No. 22-01116-ABL

28 v.
29 LAS VEGAS DEVELOPMENT FUND LLC, A
30 NEVADA LIMITED LIABILITY COMPANY,
31 et al.,
32 Defendants.

33 Date: September 1, 2022
34 Time: 9:30 a.m.

35 **DECLARATION OF DR. IGNATIUS PIAZZA IN SUPPORT OF MOTION FOR**
36 **RECONSIDERATION PURSUANT TO FEDERAL RULE OF**
37 **CIVIL PROCEDURE 54(B)**

38 I, Dr. Ignatius Piazza, hereby declare under penalty of perjury under the laws of the United
39 States of America, as follows:

40 1. I am over the age of 18 and mentally competent. The facts stated herein are within
41 my personal knowledge unless otherwise indicated. I submit this declaration in support of the

1 *Motion for Reconsideration Pursuant to Federal Rule of Civil Procedure 54(b)* (the “Motion”).¹
2 Unless stated on information and belief, I have personal knowledge of the facts set forth herein
3 and, if called upon to testify, could and would do so. For those items stated on information and
4 belief, I believe them to be true.

5 2. I am the manager of Front Sight Management LLC (the “Debtor”), the chapter 11
6 debtor in the above-captioned proceeding. I am also a counter-defendant in the above-captioned
7 adversary proceeding. Unless stated on information and belief, I have personal knowledge of the
8 facts set forth herein and, if called upon to testify, could and would do so. For those items stated
9 on information and belief, I believe them to be true.

10 3. At the time of the last scheduled depositions in the State Court Action, Debtor was
11 frantically attempting to either prevent the foreclosure of the real property (which would have
12 resulted in the immediate cessation of the Debtor’s operations and termination of all employees)
13 or obtain financing for a potential chapter 11.

14 4. Neither I, nor the other Movants, attended the scheduled depositions. We recognize
15 that, in hindsight, this may have been a mistake.

16 5. Since the beginning of the State Court Action, I, and the other Movants, have been
17 actively involved in defending the claims therein.

18 6. Jennifer Piazza is my wife. She has no involvement with Debtor, whatsoever. She
19 has no access to Debtor’s finances or books and records, and no funds have ever been transferred
20 and no disbursements have ever been made to Jennifer. Jennifer is not even involved with Debtor’s
21 operations.

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28 ¹ Capitalized terms not otherwise defined herein shall have those meanings ascribed to them in the Motion.

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7. The fraud claim in the Counterclaim is based on a contention that the Morales LOC was not a legitimate line of credit. However the Morales LOC was a legitimate line of credit, was used to fund construction and, when LVDF failed to raise the promised funds, Debtor utilized its own assets or pay down the Morales LOC

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

DATED July 15, 2022

By 
Dr. Ignatius Piazza