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15 **UNITED STATES BANKRUPTCY COURT**  
 16 **DISTRICT OF NEVADA**

18 In re:

19 FRONT SIGHT MANAGEMENT, LLC  
 20 Debtor.

Case No. BK-S-22-11824-ABL  
 Chapter 11

**OBJECTION TO DEBTOR'S**  
**DISCLOSURE STATEMENT**  
**DESCRIBING DEBTOR'S CHAPTER 11**  
**PLAN OF REORGANIZATION DATED**  
**JULY 15, 2022 AND RESERVATION OF**  
**RIGHTS**

24 LAS VEGAS DEVELOPMENT FUND, LLC ("**LVDF**") by and through its attorneys  
 25 Brian D. Shapiro, Esq., of the Law Office of Brian D. Shapiro, LLC and Andrea M. Champion,  
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1 Esq., of Jones Lovelock, hereby submit its Objection to Debtor’s Disclosure Statement Describing  
2 Debtor’s Chapter 11 Plan of Reorganization Dated July 15, 2022 and Reservation of Rights.<sup>1</sup>

3 **MEMORANDUM OF POINTS AND AUTHORITES**

4 On July 15, 2022, the Debtor filed its Chapter 11 Plan of Reorganization #1 at ECF No. 270;  
5 its Disclosure Statement at ECF No. 271 and Notice of Hearing on the Debtor’s Disclosure  
6 Statement at ECF No. 275. The hearing was set for September 1, 2022. Such documents reflected  
7 that the plan and disclosure statement were to be amended by August 4, 2022. See, ECF No. 270,  
8 p. 7, l. 5-8.

9 As of August 4, 2022, no amendment was filed. Accordingly, LVDF objects to the Disclosure  
10 Statement at ECF No. 271 based upon the adequacy of the disclosures contained within the  
11 statement.

12 However, one day past its self-imposed deadline, on August 5, 2022, the Debtor filed a notice  
13 of continued hearing date on Debtor’s Disclosure Statement Describing Debtor’s Chapter 11 Plan  
14 of Reorganization. See, ECF No. 319. Such notice reflected that the Debtor “now intends on  
15 filling {sic} an amended Plan and Disclosure statement that includes more detailed information  
16 and financial projections on or before August 26, 2022.” Id. p. 2, l. 3-8.

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<sup>1</sup> All references to “ECF No.” are to the number assigned to the documents filed in the above-captioned bankruptcy case as they appear on the docket maintained by the clerk of court. All references to “AECF No” are to the number assigned to the documents filed in adversary case number 22-ap-01116. All references to “Section” or “§§ 101-1532” are to the provisions of the Bankruptcy Code. All references to “FRCP” are to the Federal Rules of Civil Procedure. All references to “FRE” are to the Federal Rules of Evidence. All references to “FRBP” are to the Federal Rules of Bankruptcy Procedure.

1 Based upon such representations in the Notice of Hearing at ECF No. 319, LVDF reserves its  
2 rights to file a supplemental opposition, if any, to the proposed amended plan and disclosure  
3 statement which the Debtor indicated it will file on or before August 26, 2022.  
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5 Dated 8-19-2022

/s/ Brian D. Shapiro, Esq.

Brian D. Shapiro, Esq.

Attorney for LVDF

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**Certificate of Service**

On August 19, 2022, this pleading was served electronically by the Court's CM/ECF filing system to all registered users in this case, including the following parties:

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Dated 8-19-22 */s/ Brian D. Shapiro, Esq.*