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12 Attorneys for Chapter 11 Debtor  
 13 and Debtor in Possession

14 **UNITED STATES BANKRUPTCY COURT**  
 15 **FOR THE DISTRICT OF NEVADA**

<p>16 In re:</p> <p>17 Front Sight Management LLC,</p> <p>18 Debtor.</p>	<p>19 Case No. 22-11824-abl</p> <p>20 Chapter 11</p> <p>21 <b>Requested Hearing Date:</b> September 30, 2022</p> <p>22 <b>Requested Hearing Time:</b> 9:30 a.m.</p>
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23 **EX PARTE APPLICATION FOR ORDER SHORTENING TIME**  
 24 **FOR HEARING ON ADEQUACY OF THE DEBTOR’S FIRST AMENDED**  
 25 **DISCLOSURE STATEMENT AND PROCEDURE MOTION RELATED THERETO**

26 Front Sight Management LLC, the chapter 11 debtor in possession herein (the “Debtor”),  
 27 recently reached an agreement with Nevada PF, LLC (“Nevada PF”), an affiliate of the Debtor’s  
 28 post-petition lender FS DIP, LLC (“FS DIP”), pursuant to which Nevada PF will contribute \$19  
 million in cash to fund the Debtor’s chapter 11 plan (“Plan”) and will satisfy FS DIP’s secured claim  
 of approximately \$5.2 million (collectively, the “New Value Contribution”) in exchange for 100%  
 equity in the reorganized Debtor. The parties finalized this agreement on September 1, 2022, and  
 one of the terms is that the Debtor must obtain entry of a final confirmation order on or before  
 December 1, 2022. The Debtor’s professionals and Nevada PF’s professionals have worked  
 overtime the last week in an effort to get an amended Plan [ECF No. 337] on file and an amended

1 disclosure statement [ECF No. 338] (the “Disclosure Statement”) on file today (September 9, 2022)  
2 that both parties agree on. The Debtor has also filed a related motion to approve the Disclosure  
3 Statement and related procedures relating to service and voting [ECF No.339] (the “Procedure  
4 Motion”). By this ex parte application (the “Application”), the Debtor seeks entry of an order  
5 shortening time (“OST”) for a hearing on the adequacy of the Disclosure Statement and a hearing on  
6 the Procedure Motion to be scheduled for September 30, 2022 at 9:30 a.m., which is the next  
7 omnibus hearing date scheduled in this case. There is another omnibus hearing date approximately  
8 45 days later (on November 18, 2022 at 9:30 a.m.) that the Debtor and Nevada PF hope to use a Plan  
9 confirmation hearing.

10 The Debtor’s counsel emailed counsel for the parties that have appeared in this matter and, as  
11 set forth in the Attorney Information Sheet filed concurrently herewith, all counsel consented to a  
12 hearing on shortened time with respect to approval of the Disclosure Statement with some of those  
13 consents being conditioned on having 14 days to file an objection.

14 In the proposed order shortening time, the Debtor proposes that objections to the Province  
15 Employment App may be filed by September 23, 2022 (or 7 days before the proposed hearing date  
16 of September 30, 2022). This gives parties in interest at least enough time to object as if the Debtor  
17 had timely filed the Province Employment App. If the Court thinks that a later objection deadline is  
18 appropriate, then the Debtor consents to a later date. The Debtor also proposes that replies to any  
19 objections may be filed by September 27, 2022 (or three days before the proposed hearing date if  
20 that date is acceptable to the Court). The Debtor submits that the proposed deadlines give sufficient  
21 time to parties in interest to review the Disclosure Statement and the Procedure Motion prior to the  
22 proposed September 23, 2022 opposition deadline. The Disclosure Statement and Procedure Motion  
23 were filed on September 9, 2022 and served via ECF notice and via email on September 9, 2022 on  
24 the aforementioned counsel (and on the Debtor’s creditor/core/2002 list of approximately 3,000  
25 parties).

26 This Application is made pursuant to Local Bankruptcy Rule 9006, the declaration of Susan  
27 K. Seflin set forth herein, the Attorney Information Sheet filed in support hereof, and the papers and  
28 pleadings on file herein, judicial notice of which is respectfully requested.

**DECLARATION OF SUSAN K. SEFLIN**

1  
2 1. I am a partner at the law firm of BG Law LLP, bankruptcy counsel to Front Sight  
3 Management LLC (the “Debtor”). The facts stated herein are known to me to be true based on my  
4 personal knowledge. I am over 18 years of age, and if called upon to testify, I could and would  
5 competently testify to each of the facts set forth herein.

6 2. The Debtor and its professionals have worked diligently to prepare a plan that is  
7 feasible. After extensive negotiations with Nevada PF, LLC (“Nevada PF”), the Debtor and Nevada  
8 PF reached an agreement which allows for the Debtor to continue as a going concern, which allows  
9 for the Debtor’s members to obtain a new (albeit more limited) membership with the reorganized  
10 Debtor, which provides for reserves for the Debtor’s disputed secured claims, and which provides a  
11 pot of money for general unsecured creditors. A condition of this agreement is that the Debtor obtain  
12 an entered final confirmation order by no later than December 1, 2022.

13 3. The only realistic way to meet such a deadline is if the Debtor is able to use the  
14 Court’s current November 18, 2022 hearing date as a plan confirmation hearing date. The only  
15 available hearing approximately 45 days before the November 18, 2022 hearing date is the Court’s  
16 September 30, 2022 hearing date. The Debtor considered seeking conditional approval of its  
17 disclosure statement but after I discussed this possibility with counsel for the United States Trustee, I  
18 was informed that in a case this size, the UST’s preference is for a debtor to seek approval of the  
19 adequacy of disclosure statement (and not conditional approval).

20 4. Thereafter, the Debtor and its professionals and Nevada PF and its professionals have  
21 tirelessly worked to draft and finalize an amended plan, disclosure statement, new member terms,  
22 etc. so that September 30, 2022 can be used as a hearing date on approval of the disclosure  
23 statement.

24 5. In order for the Debtor to timely meet its December 1, 2022 confirmation deadline  
25 with Nevada PF, and its November 29, 2022 confirmation deadline set forth in the final DIP  
26 financing order in this case, I believe it is imperative that the hearing on approval of the Debtor’s  
27 Disclosure Statement be set on or around September 30, 2022.  
28

1 6. I contacted counsel for all interested parties about this timing on Friday, September 2,  
2 2022.

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

5 Executed on this 9<sup>th</sup> day of September, 2022, in Stateline, Nevada.

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Susan K. Seflin

10 **LEGAL ARGUMENT**

11 Section 105 allows this Court to issue such orders as are necessary to carry out the provisions  
12 of the Bankruptcy Code. 11 U.S.C. § 105(a). Rule 9006(c)(1) of the Federal Rules of Bankruptcy  
13 Procedure generally permits a bankruptcy court, for cause shown and in its discretion, to reduce the  
14 period during which any notice is given in accordance with the Bankruptcy Rules. Additionally,  
15 pursuant to Local Bankruptcy Rule 9006, the Court is empowered to issue orders shortening the time  
16 to hear motions and other applications.

17 In order to meet the Debtor's plan confirmation deadlines of November 29, 2022 and  
18 December 1, 2022, the only available omnibus hearing date for the Debtor to use is November 18,  
19 2022. Approximately 45 days before that hearing date is the September 30, 2022 hearing date that  
20 the Debtor is requesting herein. It is imperative that the Court hear the Debtor's Procedure Motion  
21 and approval of the adequacy of the Disclosure Statement on September 30, 2022 in order for the  
22 Debtor to ensure that it is able to meet its plan confirmation deadlines (which will have significantly  
23 better results for the Debtor's creditors and parties in interest). The Debtor filed and served its  
24 Disclosure Statement and Procedure Motion on September 9, 2022, and all parties will have 14 days  
25 to object. The Debtor submits that parties in interest will still have sufficient time to review and  
26 respond as warranted.

27 Local Bankruptcy Rule 9006 also requires the moving party to submit an Attorney  
28 Information Sheet indicating whether opposing counsel was provided with this notice, whether

1 opposing counsel consented to the hearing on an order shortening time, the date counsel was  
2 provided with notice, and how notice was provided or attempted to be provided. Counsel for the  
3 Debtor sent an email to counsel for: FS DIP, the United States Trustee, Michael Meacher, Las Vegas  
4 Development Fund, LLC, the Committee, the Debtor's insiders, and Armscor on September 2, 2022.  
5 All parties consented as set forth in the Attorney Information Sheet filed herewith – though some  
6 parties only consented subject to having 14 days to object.

7 **CONCLUSION**

8 For the reasons set forth herein, the Debtor respectfully requests that the Court grant this  
9 Application and issue an order shortening time to allow the hearing on adequacy of the Disclosure  
10 Statement and the hearing on the Procedure Motion to be heard on September 30, 2022 at 9:30 a.m.,  
11 and for any objection to be due by September 23, 2022 and for any reply to be due by September 27,  
12 2022.

13 DATED: September 9, 2022

BG Law LLP

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15 By: /s/ Susan K. Seflin  
16 Susan K. Seflin  
17 Jessica S. Wellington  
18 Attorneys for Front Sight Management LLC,  
19 Chapter 11 Debtor and Debtor in Possession  
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