

CARLYON CICA CHTD.
265 E. Warm Springs Road, Suite 107
Las Vegas, NV 89119

CARLYON CICA CHTD.
DAWN M. CICA, ESQ.
Nevada Bar No. 4565
TRACY M. O’STEEN, ESQ.
Nevada Bar No. 10949
265 E. Warm Springs Road, Suite 107
Las Vegas, NV 89119
PHONE: (702) 685-4444
FAX: (725) 220-4360
Email: DCica@CarlyonCica.com
TOSTeen@CarlyonCica.com

*Nevada Counsel to the Official
Committee of Unsecured Creditors*

KELLEY DRYE & WARREN LLP
ROBERT L. LEHANE, ESQ.
(Admitted *pro hac vice*)
JASON R. ADAMS, ESQ.
(Admitted *pro hac vice*)
LAUREN S. SCHLUSSEL, ESQ.
(Admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, NY 10007
PHONE: (212) 808-7800
FAX: (212) 808-7897
Email: RLehane@kelleydrye.com
JAdams@kelleydrye.com
LSchlussel@kelleydrye.com

*Counsel to the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

FRONT SIGHT MANAGEMENT LLC,

Debtor.

Case No. 22-11824-abl

Chapter 11

Hearing Date: October 24, 2022

Hearing Time: 9:30 a.m.

**DECLARATION OF ERIC A. REUBEL IN SUPPORT OF FIRST INTERIM FEE
APPLICATION OF DUNDON ADVISERS LLC FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS FINANCIAL ADVISER TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF FRONT SIGHT MANAGEMENT LLC FOR THE
PERIOD OF JUNE 15, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

I, Eric A. Reubel, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am a member of the financial advisory firm of Dundon Advisers (“Dundon Advisers”), which maintains offices at Ten Bank Street, White Plains, New York, New York 10606. Dundon Advisers is financial adviser to the Official Committee of Unsecured Creditors (the “Committee”) of Front Sight Management LLC (“Debtor”). I am familiar with Dundon Advisers’ work and billing practices, of relevant documents, and information supplied to me by other attorneys and employees of the firm. If called upon to testify as to the content of this declaration, I could and would competently do so under penalty of perjury.

1 2. I make this declaration in support of the *First Interim Fee Application of Dundon*
2 *Advisers for Compensation for Services Rendered and Reimbursement of Expenses Incurred as*
3 *Financial adviser to the Official Committee of Unsecured Creditors of Front Sight Management LLC*
4 *for the Period of June 13, 2022 Through and Including August 31, 2022* (the “Application”).

5 3. The Application has been prepared in accordance with the United States Trustee’s
6 *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed*
7 *Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee Guidelines”), as
8 well as in accordance with Rule 2016 of the Federal Rules of Bankruptcy Procedure.

9 4. I have personally reviewed the information contained in the Application, and the
10 same is true and correct to the best of my knowledge, information and belief.

11 5. I have personally reviewed the bills in this matter, and in my opinion, the charges for
12 legal services and the expenses for which reimbursement are requested represent the actual reasonable
13 fees and charges incurred by my firm in its representation of the Committee.

14 6. This is Dundon Advisers’ first application for allowance of compensation and
15 reimbursement of expenses in the Debtor’s chapter 11 case. The Application covers the period from
16 June 15, 2022 through and including August 31, 2022 (the “Application Period”).

17 7. Pursuant to the Application, Dundon Advisers requests allowance of compensation
18 in the amount of \$114,167.00 and reimbursement of expenses in the amount of \$0.00 for a total of
19 \$114,167.00 in connection with services provided during the Application Period. During the
20 Application Period, Dundon Advisers’ professionals expended a total of 168.5 hours for which
21 compensation is sought.

22 8. All services for which compensation is requested by Dundon Advisers were
23 performed for or on behalf of the Committee, and not on behalf of the Debtor or other persons. There
24 is no agreement or understanding between Dundon Advisers and any other person, other than
25 members of the firm, for the sharing of compensation to be received in this case.

26 9. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,
27 the amount requested is fair and reasonable given (i) the complexity of this case; (ii) the time
28

1 expended; (iii) the nature and extent of the services rendered; (iv) the value of such services; and (v)
2 the costs of comparable services other than in a case under this title.

3 I declare under penalty of perjury of the laws of the United States that these facts are
4 true to the best of my knowledge and belief.

5 Respectfully Submitted this 23rd day of September 2022.

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Eric A. Reubel
ERIC A. REUBEL