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

17 In re:

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

18
19 FRONT SIGHT MANAGEMENT, LLC
20 Debtor.

**EX PARTE MOTION TO FILE EXHIBITS
UNDER SEAL PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
9018**

21
22 Las Vegas Development Fund, LLC (“**LVDF**”), by and through its counsel, the Law
23 Office of Brian D. Shapiro, LLC and Jones Lovelock, hereby submits its ex parte motion to file
24 exhibits under seal pursuant to Federal Rule of Bankruptcy Procedure 9018.

25 LVDF’s Objection to Disclosure Statement, which was filed on September 23, 2022 as
26 ECF No. 373 (“**Objection**”), attached two exhibits which are subject to a protective order which
27 is believed to still be enforceable in the Adversary Proceeding involving the Debtor and LVDF.
28 Such exhibits are Exhibit 5 – a confidential 2014 private placement memorandum and Exhibit 7 –

1 a confidential 2016 private placement memorandum. Contemporaneously with the filing of the
2 Objection, Exhibit 5 and Exhibit 7 were provide to the Debtor’s counsel. On September 23, 2022,
3 Debtor’s counsel acknowledged receipt of such exhibits.
4

5 Wherefore, LVDF requests this Court to enter an order granting it permission to file Exhibit
6 5 and Exhibit 7 under seal.
7

8 DATED 9-25-2022

/s/ Brian D. Shapiro, Esq.

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CERTIFICATE OF SERVICE

On September 25, 2022, this pleading was served electronically through the Bankruptcy Court's CM/ECF Noticing System to all registered users in this case including the parties listed below.

Dated 9-25-22 */s/ Brian D. Shapiro, Esq.*

Served Electronically Upon:

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