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UNITED STATES DEPARTMENT OF JUSTICE

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11 TRACY HOPE DAVIS

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

12 In re

13 **FRONT SIGHT MANAGEMENT LLC,**

14 Debtor.

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

Date: October 24, 2022

Time: 9:30 a.m.

Location: Foley Courtroom 1, Telephonic

OMNIBUS RESERVATION OF RIGHTS OF THE U.S. TRUSTEE WITH RESPECT TO:

16 **(A) FIRST INTERIM FEE APPLICATION OF PROVINCE, LLC, AS FINANCIAL ADVISOR FOR**
17 **THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES**
18 **RENDERED AND REIMBURSEMENT OF EXPENSES [ECF Nos. 358, 359, 382 & 384];**

19 **(B) FIRST INTERIM FEE APPLICATION OF CARLYON CICA CHTD., AS NEVADA COUNSEL TO**
20 **THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION**
21 **FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE**
22 **PERIOD OF JUNE 13, 2022 THROUGH AUGUST 31, 2022 [ECF Nos. 362, 363 & 368];**

23 **(C) FIRST INTERIM FEE APPLICATION OF KELLEY DRYE & WARREN LLP**
24 **FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES**
25 **INCURRED AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF FRONT**
26 **SIGHT MANAGEMENT LLC FOR THE PERIOD FROM JUNE 13, 2022 THROUGH AND INCLUDING**
27 **AUGUST 31, 2022 [ECF Nos. 364, 365 & 368];**

28 **(D) FIRST INTERIM FEE APPLICATION OF DUNDON ADVISERS LLC FOR COMPENSATION**
29 **FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL**
30 **ADVISER TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF FRONT SIGHT**
31 **MANAGEMENT LLC FOR THE PERIOD FROM JUNE 15, 2022 THROUGH AND INCLUDING**
32 **AUGUST 31, 2022 [ECF Nos. 366, 367 & 368]; AND,**

33 **(E) FIRST INTERIM FEE APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR**
34 **THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES**
35 **RENDERED AND REIMBURSEMENT OF EXPENSES [ECF Nos. 369, 370, 383 & 384].**

1 To the Honorable August B. Landis, Chief United States Bankruptcy Judge:

2 Tracy Hope Davis, United States Trustee for Region 17, hereby files this omnibus
3 reservation of rights with respect to:

4 (a) First Interim Fee Application of Province, LLC (“Province”), As Financial
5 Advisor for the Debtor, for the Allowance of Compensation for Professional Services Rendered
6 and Reimbursement of Expenses [ECF Nos. 358, 359, 382 & 384];

7 (b) First Interim Fee Application of Carlyon Cica Chtd. (“CC”), as Nevada Counsel
8 to the Official Committee of Unsecured Creditors, for Allowance of Compensation for
9 Professional Services Rendered and Reimbursement of Expenses for the Period of June 13, 2022
10 Through August 31, 2022 [ECF Nos. 362, 363 & 368];

11 (c) First Interim Fee Application of Kelley Drye & Warren LLP (“KDW”) for
12 Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to
13 the Official Committee of Unsecured Creditors of Front Sight Management LLC for the Period
14 from June 13, 2022 Through and Including August 31, 2022 [ECF Nos. 364, 365 & 368];

15 (d) First Interim Fee Application of Dundon Advisers LLC (“DA”) for Compensation
16 for Services Rendered and Reimbursement of Expenses Incurred as Financial Adviser to the
17 Official Committee of Unsecured Creditors of Front Sight Management LLC for the Period from
18 June 15, 2022 Through and Including August 31, 2022 [ECF Nos. 366, 367 & 368]; and,

19 (e) First Interim Fee Application of BG Law LLP (“BG”), as Bankruptcy Counsel for
20 the Debtor, for the Allowance of Compensation for Professional Services Rendered and
21 Reimbursement of Expenses [ECF Nos. 369, 370, 383 & 384].

22 In support of her reservation of rights, the U.S. Trustee respectfully represents as follows:

23 1. The fee applicant bears the burden of proof to show entitlement to the requested
24 fees under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev'd in*
25 *part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990
26 (Bankr. D. Nev. 1990) (“The applicant ... has the burden of proof to show the reasonableness of
27 the fees sought.”).

