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7 Attorneys for Chapter 11 Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**  
 9 **FOR THE DISTRICT OF NEVADA**

11 In re:  
 12 Front Sight Management LLC,  
 13  
 14 Debtor.

Case No. 22-11824-abl

Chapter 11

**Hearing Date:** October 24, 2022

**Hearing Time:** 9:30 a.m.

17 **DEBTOR’S OMNIBUS RESERVATION OF RIGHTS TO FIRST INTERIM**  
 18 **APPLICATIONS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

19 Front Sight Management LLC, the chapter 11 debtor and debtor in possession herein (the  
 20 “Debtor”), hereby files its omnibus reservation of rights (the “Reservation of Rights”) with respect  
 21 to the following professionals’ (collectively, the “Professionals”) applications for compensation and  
 22 reimbursement of expenses filed in the Debtor’s chapter 11 case on September 23, 2022:

- 23 1. *First Interim Fee Application of Carlyon Cica Chtd., as Nevada counsel to the*  
 24 *Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional*  
 25 *Servicers Rendered and Reimbursement of Expenses for the Period of June 13, 2022 Through*  
 26 *August 31, 2022* [ECF No. 362] (the “Carlyon Cica Application”);
- 27 2. *First Interim Fee Application of Kelley Drye & Warren LLP for Compensation for*  
 28 *Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Official Committee of*

1 *Unsecured Creditors of Front Sight Management LLC for the Period from June 13, 2022 Through*  
 2 *and Including August 31, 2022* [ECF No. 364] (the “Kelley Drye Application”); and

3 3. *First Interim Fee Application of Dundon Advisers LLC for Compensation for Services*  
 4 *Rendered and Reimbursement of Expenses Incurred as Financial Adviser to the Official Committee*  
 5 *of Unsecured Creditors of Front Sight Management LLC for the Period from June 15, 2022 Through*  
 6 *and Including August 31, 2022* [ECF No. 366] (the “Dundon Application”).

7 4. In support of its Reservation of Rights, the Debtor respectfully states as follows:

8 **RESERVATION OF RIGHTS**

9 5. The fee applicant bears the burden of proof to show entitlement to the requested fees  
 10 under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev’d in part on*  
 11 *other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990 (Bankr. D. Nev.  
 12 1990) (“The applicant ... has the burden of proof to show the reasonableness of the fees sought.”).

13 6. The Carlyon Cica Application, the Kelley Drye Application, and the Dundon  
 14 Application request payment of fees and reimbursement of expenses in the following amounts:

Professional Name	Party	Docket No.	Compensation Period	Fees	Costs
Carlyon Cica CHTD.	Nevada Counsel for the Official Committee of Unsecured Creditors	362	June 13, 2022 – August 31, 2022	\$82,570.00	\$1,945.76
Kelley Drye & Warren LLP	Counsel for the Official Committee of Unsecured Creditors	364	June 13, 2022 – August 31, 2022	\$484,299.50	\$875.87
Dundon Advisers LLC	Financial Advisors for the Official Committee of Unsecured Creditors	366	June 15, 2022– August 31, 2022	\$114,761.00	\$0.00

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1           7.       Although the Debtor does not object to the Professionals’ requested fees and costs at  
2 this time, the Debtor reserves the rights to object to any and all the Professionals’ fees and/or costs  
3 on any and all grounds in connection with subsequent interim and final applications for  
4 compensation. *Cf. In re Strand*, 375 F.3d 854, 858 (9th Cir. 2004) (interim fee awards are “always”  
5 subject to reexamination during the course of the case).

6  
7 DATED: October 10, 2022

BG Law LLP

8  
9 By: /s/ Jessica S. Wellington  
10 Susan K. Seflin  
11 Jessica S. Wellington  
12 Attorneys for Chapter 11 Debtor in Possession  
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**CERTIFICATE OF SERVICE**

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On **October 10, 2022**, I served the following document:

**DEBTOR’S OMNIBUS RESERVATION OF RIGHTS TO FIRST INTERIM APPLICATIONS FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

**BY ELECTRONIC MAIL**

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

- JASON BLUMBERG Jason.blumberg@usdoj.gov
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- 4 • JESSICA S. WELLINGTON jwellington@bg.law

5 I declare that I am employed in the office of a member of the bar of this Court at whose  
6 direction the service was made. I declare under penalty of perjury under the laws of the United States  
of America and the State of California that the foregoing is true and correct.

7 Executed October 10, 2022, at Woodland Hills, California.

8 /s/ Abbie Au

9 ABBIE AU

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