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9 **UNITED STATES BANKRUPTCY COURT**
10 **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: January 9, 2023

Hearing Time: 9:30 a.m.

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17 **NOTICE OF HEARING ON DEBTOR’S FOURTH OMNIBUS OBJECTION (1)**
REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING
18 **AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

19 **PLEASE TAKE NOTICE** that a hearing will be held on **January 9, 2023 at 9:30 a.m.**

20 before the Honorable August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1
21 located at 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to
22 consider the *Fourth Omnibus Objection (1) Reducing and Allowing Certain Member Claims and (2)*
23 *Disallowing and Expunging Certain Other Member Claims* [ECF No. 477] (the “Omnibus
24 Objection”) filed by Front Sight Management LLC, the chapter 11 debtor and debtor in possession
25 herein (the “Debtor”), pursuant to which the Debtor seeks entry of an order sustaining the Omnibus
26 Objection, under Section 502(b) and pursuant to Bankruptcy Rule 3007(d)(1) and Local Rule 3007,
27 and reducing certain claims and disallowing certain claims filed by certain of the Debtor’s members.
28 Hearing information is available at <https://www.nvb.uscourts.gov/case-info/mega-cases/>.

1 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and the
 2 supporting declaration of Ignatius Piazza may be obtained from the Court, located at the Foley
 3 Federal Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, through the Court's
 4 electronic filing system (<https://ecf.nvb.uscourts.gov/>), for free at the Debtor's noticing agent's
 5 website <https://cases.stretto.com/FrontSight> or by sending a written request to counsel for the
 6 Debtor, Susan K. Seflin, via email at sseflin@bg.law. If the Omnibus Objection pertains to you, you
 7 should have received a copy in the mail with this Notice.

8 **PLEASE TAKE FURTHER NOTICE** that, the Omnibus Objection, the Debtor seeks to
 9 object to the following claims filed by the following claimants:

Claimant	Claim No.	Claim Amount	Proposed Treatment
Michael E. Edwards Jr.	312-1	\$61,000.00	Disallow claim in its entirety.
Douglas B Bruning	549-1	\$7,000.00	Disallow claim in its entirety.
David Chasse	618-1	\$35,984.00	Allow as a \$27,638 general unsecured claim.
Raymond & Betty H. Froess	619-1	\$36,615.00	Allow as a \$24,856 general unsecured claim.
Ralf Weber	625-1	\$806,000.00	Allow as a \$1,842 general unsecured claim.
Marc Risman	631-1	\$7,500	Disallow claim in its entirety.
James Banks	636-1	\$10,000.00	Disallow claim in its entirety.
James Yang	637-1	\$10,700.00	Allow as a \$3,692 general unsecured claim.
William E. Bookout	646-1	\$10,900.00	Allow as a \$7,592 general unsecured claim.
Leo Hamel	671-1	\$40,888.00	Allow as a \$8,838 general unsecured claim.
Jerry Harrott	682-1	\$37,140.00	Allow as a \$23,914 general unsecured claim.
Terryll Rex	685-1	\$10,000.00	Disallow claim in its entirety.
Lydia Van Landingham	709-1	\$60,000.00	Disallow claim in its entirety.
Myron K. Wiley	712-1	\$100,000.00	Disallow claim in its entirety.
Paul Hutchinson	727-1	\$155,000.00	Allow as a \$1,995 general unsecured claim.
Front Sight Management LLC (Jayson Hoffer)	729-1	\$55,000.00	Allow as a \$50,530 general unsecured claim.

Claimant	Claim No.	Claim Amount	Proposed Treatment
Front Sight Management LLC (Paul Lippitt)	731-1	\$200,000.00	Allow as a \$151 general unsecured claim.
Richard Kuan	736-1	\$100,000.00	Disallow claim in its entirety.
Howard Glassman	740-1	\$11,014.75	Allow as a \$2,400.90 general unsecured claim.
Isaiah Valencia	744-1	\$60,000.00	Disallow claim in its entirety.
Front Sight Management LLC [Gary Short] (Jeffrey Cooper)	758-1	\$100,000.00	Allow as a \$299 general unsecured claim.
Daniel Hambleton	775-1	\$15,200.00	Allow as a \$9,251.80 general unsecured claim.
Kevin Grant	779-1	\$180,000.00	Disallow claim in its entirety.
Robert John Andrews Jr	783-1	\$12,913.00	Allow as a \$8,725 general unsecured claim.
Thomas A. Collins, member no. 105208	808-1	\$15,000.00	Disallow claim in its entirety.
James A Robertson	809-1	\$87,500.00	Allow as a \$78,632 general unsecured claim.
Mark Eagleton	819-1	\$98,700.00	Allow as a \$20,477.60 general unsecured claim.
Front Sight Management LLC (Paul Macdonald)	830-1	\$54,811,040.00	Allow as a \$13,996 general unsecured claim.
William Birdzell	835-1	\$9,500.00	Disallow claim in its entirety.
Jeffrey Campbell	837-1	\$10,000.00	Allow as a \$4,989 general unsecured claim.
Mark Schwarm	840-1	\$35,048.86	Allow as a \$4,391 general unsecured claim.
Christian Jannuzzi	843-1	\$250,000.00	Allow as a \$5,272 general unsecured claim.
Matthew Cordell	848-1	\$726,444.00	Allow as a \$4,844 general unsecured claim.
Ken R. Greenwood	849-1	\$16,145.00	Allow as a \$599 general unsecured claim.

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1 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Omnibus Objection must
2 be filed pursuant to Local Rule 9014(d)(1).

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4 If you object to the relief requested, you *must* file a **WRITTEN** response to the Omnibus
5 Objection with the Court. You *must* also serve your written response on the person who sent
6 you this notice.

7 If you do not file a written response with the Court, or if you do not serve your written
8 response on the person who sent you this notice, then:

- 9 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 10 • The Court may *rule against you* without formally calling the matter at the hearing.

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12 DATED: November 4, 2022

BG Law LLP

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14 By: /s/ Jessica S. Wellington

Susan K. Seflin

Jessica S. Wellington

15 Attorneys for Chapter 11 Debtor and
16 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 November 4, 2022, I served the following document:

- **NOTICE OF HEARING ON DEBTOR’S FOURTH OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

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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- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **JESSICA S. WELLINGTON** jwellington@bg.law

I declare that I am employed in the office of a member of the bar of this Court at whose 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.

Executed November 4, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY