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7 Attorneys for Chapter 11 Debtor

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

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

Case No. 22-11824-abl  
 Chapter 11

**Hearing Date:** January 9, 2023  
**Hearing Time:** 9:30 a.m.

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 20 **STIPULATION RESOLVING THE DEBTOR’S SIXTH OMNIBUS OBJECTION AS IT**  
 21 **RELATES TO CLAIM NOS. 213-1, 214-1, AND 529-1 FILED BY WILLIAM FECZKO**

22 Front Sight Management LLC, the chapter 11 debtor herein (the “Debtor”), on the one hand,  
 23 and claimant William Feczko (“Claimant”), on the other hand, hereby enter into this stipulation (the  
 24 “Stipulation”) with regard to the following facts:

25 **RECITALS**

26 A. On May 24, 2022, the Debtor filed a voluntary petition for relief under chapter 11 of  
 27 the Bankruptcy Code, commencing this bankruptcy case.  
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1 B. On August 1, 2022, Claimant filed Proof of Claim 213-1 (“Claim 213”) pursuant to  
2 which he asserted an unsecured claim in the amount of \$48,000.00 against the Debtor.

3 C. On August 1, 2022, Claimant filed Proof of Claim 214-1 (“Claim 214”) pursuant to  
4 which he asserted an unsecured claim in the amount of \$0.00 against the Debtor.

5 D. On October 14, 2022, Claimant filed Proof of Claim 529-1 (“Claim 529”) pursuant to  
6 which he asserted an unsecured claim in the amount of \$0.00 against the Debtor.

7 E. On November 29, 2022, the Debtor filed its *Sixth Omnibus Objection to Duplicate*  
8 *Claims* [ECF No. 561] (the “Objection”) pursuant to which the Debtor objected to, among other  
9 claims, Claim 213 and Claim 214.

10 F. Subsequently, Claimant reached out to counsel for the Debtor with respect to the  
11 Objection and the parties have agreed to stipulate to the amount of Claim 213 as set forth below and  
12 to disallow Claim 214 and Claim 529 in their entirety.

13 **STIPULATION**

14 **WHEREFORE**, the parties hereby agree and stipulate as follows:

15 1. The foregoing recitals are incorporated herein in full by this reference.

16 2. Claim 213 is allowed as a general unsecured claim in the amount of \$75,472.50 (the  
17 “Allowed Claim”).

18 3. Claim 214 and Claim 529 shall be disallowed in their entirety.

19 4. Except for the Allowed Claim and the right to enforce the Stipulation and the order  
20 approving the Stipulation, Claimant shall have no additional claim(s) against the Debtor or its estate  
21 arising from or relating to the facts alleged in Claim 213, Claim 214 or Claim 529.

22 5. To the extent that the Objection relates to Claim 213, Claim 214 or Claim 529, it is  
23 resolved pursuant to this Stipulation.

24 6. Upon entry of the order approving this Stipulation, Stretto, the claim and noticing  
25 agent appointed in the Debtor’s case, shall be directed to modify and update its database for this case  
26 to reflect that Claim 213 is allowed as a general unsecured claim in the amount of \$75,472.50 and  
27 that Claim 214 and Claim 529 shall be disallowed in their entirety.

1           7.       Upon entry of the order approving this Stipulation, the Court clerk shall be directed to  
2 modify and update the claim register in this case to reflect an allowed amount of an \$75,472.50  
3 general unsecured claim for Claim 213 and that Claim 214 and Claim 529 shall be disallowed in  
4 their entirety.

5           8.       The parties agree that signatures transmitted electronically, including, for example, by  
6 email or facsimile, shall be original signatures for all purposes, and that multiple signed versions of  
7 the Stipulation shall constitute one and the same instrument.

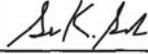
8           9.       The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce  
9 this Stipulation and the order approving it.

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**THE FOREGOING IS AGREED:**

DATED: November 30, 2022

BG Law LLP

By:   
\_\_\_\_\_  
Susan K. Sefflin  
Jessica S. Wellington  
Attorneys for Chapter 11 Debtor

DATED: November 30, 2022

By:   
\_\_\_\_\_  
William Feczko, Claimant

**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 December 1, 2022, I served the following document:

- **STIPULATION RESOLVING THE DEBTOR’S SIXTH OMNIBUS OBJECTION AS IT RELATES TO CLAIM NOS. 213-1, 214-1, AND 529-1 FILED BY WILLIAM FECZKOBY ELECTRONIC MAIL**

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

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- **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 December 1, 2022, at Woodland Hills, California.

/s/ Jessica Studley  
JESSICA STUDLEY