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7 Attorneys for Chapter 11 Debtor

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

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

Case No. 22-11824-abl  
 Chapter 11

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

19 **DECLARATION OF STEVEN T. GUBNER IN SUPPORT OF SECOND AND FINAL FEE**  
 20 **APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTOR,**  
 21 **RENDERED AND REIMBURSEMENT OF EXPENSES**

23 I, Steven T. Gubner, declare as follows:

24 1. I am an attorney duly licensed in and am a member in good standing of the bar for the  
 25 State of Nevada and am admitted to practice before all courts of the State of Nevada, including the  
 26 United States Bankruptcy Court for the District of Nevada, and I am authorized to make this  
 27 declaration. I am the managing partner and founder of the law firm of BG Law LLP (“BG”),  
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1 bankruptcy counsel for Front Sight Management LLC (the “Debtor”) during its chapter 11  
2 bankruptcy case.

3 2. I am the attorney at BG primarily responsible for overseeing the billing in this matter  
4 and for assuring compliance with the Bankruptcy Rules, the Local Rules, and the guidelines from the  
5 United States Trustee (“US Trustee”). The facts set forth herein are based upon my personal  
6 knowledge, and, if called as a witness, I could and would testify competently thereto.

7 3. I make this declaration in support of the *Second and Final Fee Application of BG*  
8 *Law LLP, as Bankruptcy Counsel for the Debtor, for the Allowance of Compensation for*  
9 *Professional Services Rendered and Reimbursement of Expenses* (the “Application”) filed  
10 concurrently with this declaration. All capitalized terms not otherwise defined herein shall have the  
11 same meaning as set forth in the Application.

12 4. I reviewed the Application, and the matters stated therein are true to the best of my  
13 knowledge, information and belief.

14 5. The amounts requested in the Application for fees and costs are based on the records  
15 assembled and kept in the ordinary course of BG’s business. Such records are made at or near the  
16 time incurred by, or from information transmitted by, a person with knowledge of the matter  
17 recorded.

18 6. Pursuant to the terms of the order approving BG’s employment, BG was employed on  
19 an hourly fee basis.

20 7. A true and correct copy of BG’s detailed billing statements including all of BG’s time  
21 records for legal services rendered in this case during the Interim Compensation Period, including  
22 time spent by paralegals, is attached as **Exhibit 1** to the Application, and incorporated herein by this  
23 reference. The billing statement reflects a format in which the entries are listed in chronological  
24 order and sorted by activity code category. The activity code categories used were created in  
25 conformity with the guidelines established by the US Trustee.

26 8. True and correct copies of summaries of fees sorted by activity codes for timekeeper  
27 totals and on a monthly basis, prepared for the purpose of this Application, are attached to the  
28 Application as **Exhibits 2 and 3**, respectively, and are incorporated herein by this reference.

1           9.       A true and correct copy of a summary of all expenses incurred on a monthly basis in  
2 representing the Debtor during the Interim Compensation Period is attached as **Exhibit 4** to the  
3 Application and incorporated herein by this reference. I am informed and believe that BG adhered  
4 to allowable rates for expenses as fixed by the guidelines set forth by the US Trustee.

5           10.      Biographical information describing the professional education and experience of  
6 BG's attorneys and paralegals that rendered services in this case is attached as **Exhibit 5** to the  
7 Application and incorporated herein by this reference.

8           11.      No agreement or understanding exists between BG and any other entity for the  
9 sharing of compensation received or to be received for services rendered in or in connection with the  
10 case except as between members and associates of the BG.

11           I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct.

13           Executed this 12th day of December, 2022 at Woodland Hills, California.

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17 Steven T. Gubner  
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