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UNITED STATES DEPARTMENT OF JUSTICE  
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Attorneys for the United States Trustee for Region 17  
TRACY HOPE DAVIS

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

FRONT SIGHT MANAGEMENT LLC,

Debtor.

Case No: 22-11824-abl  
Chapter 11

Date: January 9, 2023  
Time: 9:30 a.m.  
Place: Telephonic, Foley Courtroom 1

**UNITED STATES TRUSTEE’S NOTICE OF VOLUNTARY REDUCTION  
IN FEES WITH RESPECT TO BG LAW, LLP’S AMENDED  
FIRST INTERIM AND SECOND AND FINAL FEE APPLICATIONS**

Tracy Hope Davis, United States Trustee for Region 17, by and through her undersigned counsel, hereby files this *Notice of Voluntary Reduction in Fees* with Respect to the First Interim and Second and Final Fee Applications (“Fee Applications”) filed by BG Law, LLP (“Applicant”) in the above-captioned case. [ECF Nos. 383 and 590].

In support, the United States Trustee respectfully represents as follows:

1. The fee applicant bears the burden of proof to show entitlement to the requested 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 part on other grounds*, 468 F.3d 592 (91172th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990 (Bankr. D. Nev. 1990) (“[t]he applicant ... has the burden of proof to show the reasonableness of the fees sought”).

1           2.       The United States Trustee has reached an agreement with Applicant to resolve the  
2 United States Trustee’s informal objections to the Fee Applications prior to the above-captioned  
3 hearing. Applicant has consented to a voluntary reduction of \$5,000 in fees instead of the filing  
4 of a supplement to address various legal service descriptions that, in the United States Trustee’s  
5 view, contain vague entries or constitute block billing.  
6

7           3.       After accounting for Applicant’s voluntary reduction of \$5,000 in fees, the Fee  
8 Applications request a total of \$1,142,445 in fees and \$24,825.25 in expenses. [*See* ECF Nos.  
9 383 *and* 590]. Considering the voluntary reduction, the United States Trustee does not object to  
10 Applicant’s Fee Applications.  
11

12           Dated: December 23, 2022

TRACY HOPE DAVIS  
UNITED STATES TRUSTEE

/s/ Edward M. McDonald Jr.

Edward M. McDonald Jr.  
Trial Attorney for the United States Trustee