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6 UNITED STATES DEPARTMENT OF JUSTICE
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11 TRACY HOPE DAVIS

12 **UNITED STATES BANKRUPTCY COURT**
13 **DISTRICT OF NEVADA**

<p>14 In re:</p> <p>15 FRONT SIGHT MANAGEMENT LLC,</p> <p>16 Debtor.</p>	<p>17 Case No: 22-11824-ABL</p> <p>18 Chapter 11</p> <p>19 Date: January 9, 2023</p> <p>20 Time: 9:30 a.m.</p> <p>21 Place: Telephonic, Foley Courtroom 1</p>
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22 **UNITED STATES TRUSTEE’S NOTICE OF VOLUNTARY REDUCTION**
23 **IN FEES WITH RESPECT TO KELLEY DRYE & WARREN LLP’S**
24 **SECOND AND FINAL FEE APPLICATION**

25 Tracy Hope Davis, United States Trustee for Region 17, by and through her
26 undersigned counsel, hereby files this *Notice of Voluntary Reduction in Fees* with Respect to
27 the Final Fee Application filed by Kelley Drye & Warren LLP (“Applicant”) in the above-
28 captioned case (the “Application”). [ECF Nos. 364 and 596 (first interim and second and final,
respectively)].

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 (9th 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 Application prior to the above-captioned
3 hearing. Applicant has consented to a voluntary reduction of \$74,698.92 to address the United
4 States Trustee’s informal objections to the Application.
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6 3. After accounting for Applicant’s voluntary reduction of \$74,698.92 in fees, the
7 Application requests a total of \$859,037.58 in fees and \$5,323.57 in expenses. [*See* ECF Nos.
8 364 *and* 596]. Considering the voluntary reduction, the United States Trustee does not object to
9 Applicant’s second and final request for fees and expenses.
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11 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