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 the Liquidating Trustee of the Front Sight Creditors Trust
 8

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

<p>11 In re:</p> <p>12 Front Sight Management LLC,</p> <p>13</p> <p>14 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: January 9, 2023 Hearing Time: 9:30 a.m.</p>
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17 **STIPULATION RESOLVING THIRD OMNIBUS OBJECTION AS IT RELATES TO**
 18 **CLAIMS 290-1 and 293-1 FILED BY KORTNEY OTTEN AND DOUGLAS BONNEY**

19 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee
 20 (the “Liquidating Trustee”) of the Front Sight Creditors Trust, on the one hand, and claimants
 21 Kortney Otten (“Otten”) and Douglas Bonney (“Bonney,” and together with Otten, “Claimants”), on
 22 the other hand, hereby enter into this stipulation (the “Stipulation”) with regard to the following
 23 facts:

24 **RECITALS**

25 A. On May 24, 2022, Front Sight Management LLC (the “Debtor”) filed a voluntary
 26 petition for relief under chapter 11 of the Bankruptcy Code, commencing this bankruptcy case.

27 B. On August 8, 2022, Otten filed Proof of Claim 290-1 (“Claim 290”) pursuant to
 28 which she asserted an unsecured claim in the amount of \$15,000.00 against the Debtor.

1 C. On August 8, 2022, Bonney filed Proof of Claim 293-1 (“Claim 293,” and together
2 with Claim 290, the “Claims”) pursuant to which he asserted an unsecured claim in the amount of
3 \$70,000.00 against the Debtor.

4 D. On October 21, 2022, the Debtor filed its *Third Omnibus Objection to (1) Reducing*
5 *and Allowing Certain Member Claims and (2) Disallowing and Expunging Certain Other Member*
6 *Claims* [ECF No. 442] (the “Objection”) pursuant to which the Debtor objected to, among other
7 claims, Claim 290 and Claim 293.

8 E. On November 29, 2022, the Court entered an order [ECF No. 556] confirming the
9 Debtor’s Second Amended Chapter 11 Plan of Reorganization (the “Plan”). The effective date of
10 the Plan was December 2, 2022 (the “Effective Date”). As of the Effective Date, the Liquidating
11 Trustee was vested with sole authority to prosecute most objections to claims in this bankruptcy
12 case, including the authority to prosecute the Objection.

13 F. Subsequently, Claimants reached out to counsel for the Liquidating Trustee with
14 respect to the Objection and the parties have agreed to stipulate to the amount of Claim 290 and
15 Claim 293 as set forth below, subject to Court approval.

16 **STIPULATION**

17 **WHEREFORE**, the parties hereby agree and stipulate, subject to Court approval, as follows:

- 18 1. The foregoing recitals are incorporated herein in full by this reference.
 - 19 2. Claim 290 shall be allowed as a general unsecured claim in the amount of \$4,900, and
20 disallowed to the extent that it asserts any amount over \$4,900.
 - 21 3. Claim 293 shall be allowed as a general unsecured claim in the amount of \$4,900, and
22 disallowed to the extent that it asserts any amount over \$4,900.
 - 23 4. Except for the allowed Claims and the right to enforce the Stipulation and the order
24 approving the Stipulation, Claimants shall have no additional claim(s) against the Debtor or its estate
25 arising from or relating to the facts alleged in Claim 290 or Claim 293.
 - 26 5. To the extent that the Objection relates to Claim 290 or Claim 293, it is resolved
27 pursuant to this Stipulation.
- 28

1 6. 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 a \$4,900.00 general
3 unsecured claim for Claim 290 and an allowed amount of a \$4,900.00 general unsecured claim for
4 Claim 293.

5 7. 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 8. The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce
9 this Stipulation and the order approving it.

10 **THE FOREGOING IS AGREED:**

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12 DATED: January 4, 2022

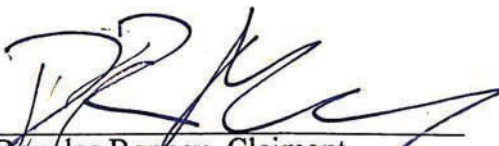
BG Law LLP

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14 By: /s/ Susan K. Seflin
15 Susan K. Seflin
16 Jessica S. Wellington
17 Attorneys for Province, LLC, solely in its capacity as
18 the Liquidating Trustee of the Front Sight Creditors
19 Trust

20
21 DATED: January 4, 2022

22
23 By: 
24 Kortney Otten, Claimant

25
26 DATED: January 4, 2022

27
28 By: 
Douglas Bonney, 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 **January 5, 2023**, I served the following document:

STIPULATION RESOLVING THIRD OMNIBUS OBJECTION AS IT RELATES TO CLAIMS 290-1 AND 293-1 FILED BY KORTNEY OTTEN AND DOUGLAS BONNEY

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

(1) The Court's CM/ECF List:

- JASON BLUMBERG Jason.blumberg@usdoj.gov
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- JESSICA S. WELLINGTON jwellington@bg.law, ecf@bg.law

1 **(2) VIA U.S. First Class Mail:**

2 Claimant

3 Douglas R. Bonney
4 29399 N. 74th Street
5 Scottsdale, AZ 85266-2145

6 Claimant

7 Kortney Otten
8 29399 N. 74th Street
9 Scottsdale, AZ 85266-2145

10 **(3) VIA E-MAIL:**

11 Claimant

12 Douglas R. Bonney
13 Email: caiiistoga@aol.com

14 Claimant

15 Kortney Otten
16 Email: Kortney.otten@gknet.com

17 I declare that I am employed in the office of a member of the bar of this Court at whose
18 direction the service was made. I declare under penalty of perjury under the laws of the United States
19 of America and the State of California that the foregoing is true and correct.

20 Executed January 5, 2023, at Woodland Hills, California.

21 /s/ Jessica Studley
22 JESSICA STUDLEY