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12 Attorneys for Province, LLC, solely in its capacity as
 13 the Liquidating Trustee of the Front Sight Creditors Trust

14 **UNITED STATES BANKRUPTCY COURT**
 15 **FOR THE DISTRICT OF NEVADA**

16 In re:
 17 Front Sight Management LLC,
 18
 19 Debtor.

20 Case No. 22-11824-abl

21 Chapter 11

22 **Hearing Date:** April 13, 2023

23 **Hearing Time:** 9:30 a.m.

24 **NOTICE OF HEARING ON TENTH OMNIBUS OBJECTION (1) REDUCING**
 25 **AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING**
 26 **AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

27 **PLEASE TAKE NOTICE** that a hearing will be held on **April 13, 2023 at 9:30 a.m.** before
 28 the Honorable August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1 located at
 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to consider the
Tenth Omnibus Objection (1) Reducing and Allowing Certain Member Claims and (2) Disallowing
and Expunging Certain Other Member Claims [ECF No. 700] (the “Omnibus Objection”) filed by
 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee (the

1 “Liquidating Trustee”¹ of the Front Sight Creditors Trust, pursuant to which the Liquidating Trustee
 2 seeks entry of an order sustaining the Omnibus Objection, under Section 502(b) and pursuant to
 3 Bankruptcy Rule 3007(d)(1) and Local Rule 3007, and reducing certain claims and disallowing
 4 certain claims filed by certain of the Debtor’s former members. Hearing information is available at
 5 <https://www.nvb.uscourts.gov/case-info/mega-cases/>.

6 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and the
 7 supporting declaration of Amanda Demby Swift may be obtained from the Court, located at the
 8 Foley Federal Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, through the Court’s
 9 electronic filing system (<https://ecf.nvb.uscourts.gov/>), for free at the Debtor’s noticing agent’s
 10 website <https://cases.stretto.com/FrontSight> or by sending a written request to counsel for the
 11 Liquidating Trustee, Susan K. Seflin, via email at sseflin@bg.law. If the Omnibus Objection
 12 pertains to you, you should have received a copy in the mail with this Notice.

13 **PLEASE TAKE FURTHER NOTICE** that through the Omnibus Objection the Liquidating
 14 Trustee seeks to object to the following claims filed by the following claimants:

| Claimant | Claim No. | Claim Amount | Proposed Treatment |
|--------------------------|-----------|--------------|--|
| Robert A. Wilcox | 541-1 | \$8,000.00 | Disallow claim in its entirety. |
| Brent Frame | 542-1 | \$3,049.00 | Allow as a \$299.00 general unsecured claim. |
| Robert Perez | 546-1 | \$2,000.00 | Allow as a \$299.00 general unsecured claim. |
| James Stone, II | 553-1 | \$1,000.00 | Disallow claim in its entirety. |
| Phan Nguyen | 554-1 | \$1,000.00 | Disallow claim in its entirety. |
| Deborah Zugel | 555-1 | \$1,000.00 | Allow as a \$50.00 general unsecured claim. |
| Hollis K. Fox | 562-1 | \$3,644.00 | Allow as a \$1,547.00 general unsecured claim. |
| Ronald Hack | 571-1 | \$1,000.00 | Disallow claim in its entirety. |
| Walter Fetsch | 572-1 | \$1,997.00 | Disallow claim in its entirety. |
| Thomas V. Gentry | 573-1 | \$1,500.00 | Allow as a \$99.00 general unsecured claim. |
| Frank Chandler Harris | 575-1 | \$1,500.00 | Allow as a \$301.00 general unsecured claim. |
| W.R. Henderson | 583-1 | \$4,900.00 | Allow as a \$1,000.00 general unsecured claim. |

27 ¹ Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of
 28 reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections
 relating to general unsecured claims.

| | Claimant | Claim No. | Claim Amount | Proposed Treatment |
|----|--|------------------|---------------------|--|
| 1 | Somboon Sayawat | 588-1 | \$1,050.00 | Disallow claim in its entirety. |
| 2 | Peter Gibbons | 592-1 | \$4,450.00 | Disallow claim in its entirety. |
| 3 | Catherine J. Johnson | 595-1 | \$2,000.00 | Disallow claim in its entirety. |
| 4 | Charlotte C. Wagner | 596-1 | \$2,000.00 | Disallow claim in its entirety. |
| 5 | Rich Zollinger | 603-1 | \$1,000.00 | Allow as a \$150.00 general unsecured claim. |
| 6 | Marc Kuttner | 609-1 | \$2,500.00 | Allow as a \$100.00 general unsecured claim. |
| 7 | Timothy Mulverhill | 617-1 | \$3,000.00 | Disallow claim in its entirety. |
| 8 | Ewin Theodore Verdict | 620-1 | \$3,398.00 | Allow as a \$1,594.00 general unsecured claim. |
| 9 | Kason Goodrich | 624-1 | \$2,100.00 | Allow as a \$751.00 general unsecured claim. |
| 10 | John E. McCabe | 626-1 | \$3,998.00 | Allow as a \$2,000.00 general unsecured claim. |
| 11 | Chad Behrend | 630-1 | \$1,550.00 | Allow as a \$348.00 general unsecured claim. |
| 12 | Thomas Amero | 639-1 | \$1,000.00 | Disallow claim in its entirety. |
| 13 | Gregory W. Romaniak | 640-1 | \$3,000.00 | Allow as a \$1,093.00 general unsecured claim. |
| 14 | Eric Fletcher | 642-1 | \$2,500.00 | Disallow claim in its entirety. |
| 15 | Tammy J. Smith | 654-1 | \$9,185.00 | Allow as a \$1,046.00 general unsecured claim. |
| 16 | Erik Matthew Moll | 655-1 | \$5,000.00 | Allow as a \$10.00 general unsecured claim. |
| 17 | Nicholas McRay | 656-1 | \$1,800.00 | Allow as a \$400.00 general unsecured claim. |
| 18 | Scott Ingham | 662-1 | \$2,749.00 | Disallow claim in its entirety. |
| 19 | Thomas J. Campbell | 666-1 | \$9,600.00 | Allow as a \$4,391.00 general unsecured claim. |
| 20 | Jeffrey Lee Tucker | 676-1 | \$5,740.00 | Allow as a \$299.00 general unsecured claim. |
| 21 | Lisa Thomas | 677-1 | \$3,000.00 | Disallow claim in its entirety. |
| 22 | Stuart Butler | 680-1 | \$8,691.00 | Allow as a \$4,241.00 general unsecured claim. |
| 23 | William M. Scruggs | 693-1 | \$3,767.10 | Allow as a \$2,147.00 general unsecured claim. |
| 24 | Scott Sacchi | 694-1 | \$2,334.00 | Allow as a \$794.00 general unsecured claim. |
| 25 | Catherine Logie | 701-1 | \$1,694.00 | Allow as a \$297.00 general unsecured claim. |
| 26 | Bruce Logie | 702-1 | \$1,294.00 | Disallow claim in its entirety. |
| 27 | Max Kibu | 708-1 | \$3,200.00 | Allow as a \$1,751.00 general unsecured claim. |
| 28 | Stephen Wilson | 710-1 | \$6,000.00 | Disallow claim in its entirety. |
| | Dara Grieger | 711-1 | \$1,500.00 | Allow as a \$500.00 general unsecured claim. |
| | Jim Bradley (Front Sight Management LLC [Short, Gary]) | 720-1 | \$2,496.00 | Allow as a \$596.00 general unsecured claim. |
| | Kevrin J. Johnson | 722-1 | \$2,500.00 | Allow as a \$1,099.00 general unsecured claim. |

| | Claimant | Claim No. | Claim Amount | Proposed Treatment |
|----|-----------------------|-----------|--------------|--|
| 1 | Ron Maddon (Front | | | |
| 2 | Sight Management | 724-1 | \$3,894.00 | Allow as a \$1,593.00 general unsecured claim. |
| 3 | LLC) | | | |
| 4 | Michael Walstien | 725-1 | \$5,000.00 | Disallow claim in its entirety. |
| 5 | James J. Wilcox, Jr. | 728-1 | \$1,250.00 | Allow as a \$397.00 general unsecured claim. |
| 6 | James E. Larson, Jr. | 730-1 | \$2,000.00 | Disallow claim in its entirety. |
| 7 | Deborah Torrano | 734-1 | \$1,100.00 | Allow as a \$100.00 general unsecured claim. |
| 8 | John P. Panozzo, Jr. | 748-1 | \$5,000.00 | Allow as a \$748.00 general unsecured claim. |
| 9 | Jill Adler | 761-1 | \$1,200.00 | Disallow claim in its entirety. |
| 10 | Geoffrey Stimack | 763-1 | \$8,197.00 | Allow as a \$997.00 general unsecured claim. |
| 11 | Mitchell Tyler Ryan | | | |
| 12 | (Stretto) | 771-1 | \$1,200.00 | Disallow claim in its entirety. |
| 13 | Joan Modes | 788-1 | \$2,000.00 | Disallow claim in its entirety. |
| 14 | Colin Camillo | 795-1 | \$2,000.00 | Allow as a \$997.00 general unsecured claim. |
| 15 | Karin Macer | 814-1 | \$2,000.00 | Disallow claim in its entirety. |
| 16 | Matthew Macer | 815-1 | \$2,000.00 | Disallow claim in its entirety. |
| 17 | Christina Macer | 816-1 | \$2,000.00 | Disallow claim in its entirety. |
| 18 | Brian Joseph | | | |
| 19 | Simmons | 818-1 | \$3,500.00 | Disallow claim in its entirety. |
| 20 | Larry Fried | 826-1 | \$1,000.00 | Disallow claim in its entirety. |
| 21 | Eric R. Fried | 829-1 | \$1,000.00 | Disallow claim in its entirety. |
| 22 | Kerem Kapkin | 831-1 | \$3,150.00 | Disallow claim in its entirety. |
| 23 | Melanie L. Fried | 833-1 | \$1,000.00 | Disallow claim in its entirety. |
| 24 | Robin Withrow | | | |
| 25 | Wong | 838-1 | \$3,000.00 | Allow as a \$549.00 general unsecured claim. |
| 26 | Charles Herron | 846-1 | \$3,545.00 | Disallow claim in its entirety. |
| 27 | Christopher Brown | 901-1 | \$9,359.00 | Disallow claim in its entirety. |
| 28 | Joseph Ignacio | | | |
| 29 | Sandoval | 902-1 | \$1,000.00 | Disallow claim in its entirety. |
| 30 | Connie Rae Sandoval | 903-1 | \$1,000.00 | Disallow claim in its entirety. |
| 31 | Rudy Quan | 904-1 | \$5,810.00 | Allow as a \$1,698.00 general unsecured claim. |
| 32 | Christopher Kyler | 906-1 | \$1,000.00 | Disallow claim in its entirety. |
| 33 | Faye Johnson | 913-1 | \$4,500.00 | Allow as a \$2,597.00 general unsecured claim. |
| 34 | Amanda Todd | 920-1 | \$1,800.00 | Disallow claim in its entirety. |
| 35 | James M. Bledsoe, III | 921-1 | \$2,000.00 | Disallow claim in its entirety. |
| 36 | Gregory P. Smith | 935-1 | \$1,998.98 | Allow as a \$700.00 general unsecured claim. |

| Claimant | Claim No. | Claim Amount | Proposed Treatment |
|-------------------|-----------|--------------|--|
| Truman D. Fields | 947-1 | \$5,000.00 | Allow as a \$2,963.00 general unsecured claim. |
| David Maurin | 949-1 | \$2,290.02 | Allow as a \$1,297.00 general unsecured claim. |
| Gregory F. Ariola | 987-1 | \$2,000.00 | Disallow claim in its entirety. |
| David W. Frye | 997-1 | \$1,849.00 | Allow as a \$299.00 general unsecured claim. |
| Kathleen M. Hayes | 1012-1 | \$5,000.00 | Disallow claim in its entirety. |
| Jonathan Stern | 1031-1 | \$1,450.00 | Disallow claim in its entirety. |

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 9014(d)(1), any opposition or response to the Omnibus Objection (i) must set forth all relevant facts and any relevant legal authority, (ii) must be supported by affidavits or declarations that conform to the provisions of Local Rule 9014(c), and (iii) must be filed with the Court no later than **March 30, 2023 (or 14 days before the hearing)**.

NOTICE IS FURTHER GIVEN that if you do not want the Court to grant the relief sought in the Omnibus Objection, or if you want the Court to consider your views on the Omnibus Objection, then you must file an opposition with the Court, and serve a copy on the person making the Omnibus Objection **no later than 14 days** preceding the hearing date for the Omnibus Objection, unless an exception applies (*see* Local Rule 9014(d)(3)).

If you object to the relief requested, you *must* file a **WRITTEN** response to the Omnibus Objection with the Court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the Court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

DATED: February 17, 2023

BG Law LLP

By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

Attorneys for Province, LLC, solely in its capacity as the Liquidating Trustee of the Front Sight Creditors Trust