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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**

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| <p>16 In re:</p> <p>17 Front Sight Management LLC,</p> <p>18 Debtor.</p> | <p>19 Case No. 22-11824-abl</p> <p>20 Chapter 11</p> <p>21 Hearing Date: April 13, 2023 Hearing Time: 9:30 a.m.</p> |
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22 **NOTICE OF HEARING ON ELEVENTH OMNIBUS OBJECTION TO PROOFS OF**
 23 **CLAIM THAT ASSERT AN INCORRECT PRIORITY**

24 **PLEASE TAKE NOTICE** that a hearing will be held on **April 13, 2023 at 9:30 a.m.** before
 25 the Honorable August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1 located at
 26 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to consider the
 27 *Eleventh Omnibus Objection to Proofs of Claim that Assert an Incorrect Priority* [ECF No. 709] (the
 28 “Omnibus Objection”) filed by Province, LLC, solely in its capacity as the duly authorized and
 acting Liquidating Trustee (the “Liquidating Trustee”)¹ of the Front Sight Creditors Trust, pursuant

¹ Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections in this case except for those relating to Las Vegas Development Fund, LLC and Michael Meacher.

1 to which the Liquidating Trustee seeks entry of an order sustaining the Omnibus Objection, under
 2 Section 502(b) and pursuant to Bankruptcy Rule 3007(d)(1) and Local Rule 3007, and reclassifying
 3 certain claims as general unsecured claims. Hearing information is available at
 4 <https://www.nvb.uscourts.gov/case-info/mega-cases/>.

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

12 **PLEASE TAKE FURTHER NOTICE** that through the Omnibus Objection the Liquidating
 13 Trustee seeks an order reclassifying the following proofs of claims as general unsecured claims filed
 14 by the following claimants:

| Claimant | Claim No. | Date Filed | Proposed Treatment |
|------------------|-----------|------------|---|
| Carney, Brian | 1016-1 | 12/30/2022 | Allow as a \$8,446.00 general unsecured claim. |
| Hansen, Michael | 990-1 | 12/16/2022 | Allow as a \$500.00 general unsecured claim. |
| Kaschak, John M. | 968-1 | 12/8/2022 | Allow as a \$798.00 general unsecured claim. |
| Lewis, Paul | 1041-1 | 1/3/2023 | Allow as a \$500.00 general unsecured claim. |
| Neidich, Robert | 227-2 | 1/3/2023 | Allow as a \$27,535.00 general unsecured claim. |
| Nelson, Eric | 1044-1 | 1/3/2023 | Allow as a \$700.00 general unsecured claim. |
| Rosen, Philip J. | 943-1 | 11/21/2022 | Allow as a \$250.00 general unsecured claim. |

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

26 **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief sought
 27 in the Omnibus Objection, or if you want the Court to consider your views on the Omnibus
 28 Objection, then you must file an opposition with the Court, and serve a copy on the person making

1 the Omnibus Objection **no later than 14 days** preceding the hearing date for the Omnibus
2 Objection, unless an exception applies (*see* Local Rule 9014(d)(3)).

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

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

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

11 DATED: February 22, 2023

BG Law LLP

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13
14 By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

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