

1 STEVEN T. GUBNER – NV Bar No. 4624
 2 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*
 3 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*
 4 BG LAW LLP
 5 300 S. 4th Street, Suite 1550
 6 Las Vegas, NV 89101
 7 Telephone: (702) 835-0800
 8 Facsimile: (866) 995-0215
 9 Email: sgubner@bg.law
 10 sseflin@bg.law
 11 jwellington@bg.law

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**

<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 TWELFTH OMNIBUS OBJECTION**
 23 **TO LATE-FILED PROOFS OF CLAIM**

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 *Twelfth Omnibus Objection to Late-Filed Proofs of Claim* [ECF No. 711] (the “Omnibus
 28 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 to

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 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 disallowing
 3 certain claims in their entirety because they were filed after January 3, 2023, which was the deadline
 4 for the Debtor's former members to file proof of claims for claims arising out of rejection of their
 5 memberships. Hearing information is available at [https://www.nvb.uscourts.gov/case-info/mega-](https://www.nvb.uscourts.gov/case-info/mega-cases/)
 6 [cases/](https://www.nvb.uscourts.gov/case-info/mega-cases/).

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

14 **PLEASE TAKE FURTHER NOTICE** that through the Omnibus Objection the Liquidating
 15 Trustee seeks an order disallowing the following proofs of claims in their entirety filed by the
 16 following claimants:

Claimant	Claim No.	Date Filed	Filed Claim Amount	Proposed Treatment
Dib, Fadi	1064-1	2/14/2023	\$2,765.00	Disallow
Hale, Kenneth D.	1059-1	1/16/2023	\$20,000.00	Disallow
Karnow, Robert F.	1060-1	1/19/2023	\$450.00	Disallow
Lippmann, Robert M.	1065-1	2/15/2023	\$5,000.00	Disallow
Rougeaux, Ron	1063-1	2/5/2023	\$37,000.00	Disallow
Slater, Jason	1061-1	1/26/2023	\$198.00	Disallow

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

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

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

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

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

14 DATED: February 22, 2023

BG Law LLP

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16
17 By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

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