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9 *Attorneys for Reorganized Debtor*
 10 *Front Sight Management LLC*

11 **UNITED STATES BANKRUPTCY COURT**
 12 **FOR THE DISTRICT OF NEVADA**

13 In re:
 14 FRONT SIGHT MANAGEMENT LLC,
 15 Reorganized Debtor.

Case No.: 22-11824-ABL
 Chapter 11

Old Hearing Date:
 Date: March 24, 2023
 Time: 9:30 a.m.

[Proposed] New Hearing Date
 Date: April 7, 2023
 Time: 3:00 p.m.

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 20 **STIPULATION TO ATTEND SETTLEMENT MEETING AND EXTEND DISCOVERY**
 21 **DEADLINES REGARDING LVDF CLAIM NO. 284**
 22 **AND REMAINING ADVERSARY CLAIMS**

23 Reorganized Debtor Front Sight Management, LLC, a Nevada limited liability company
 24 (“Debtor” or “Front Sight,” as applicable), by and through its counsel, Garman Turner Gordon
 25 LLP, and Las Vegas Development Fund LLC, a Nevada limited liability company (“LVDF”),
 26 Robert Dziubla, Jon Fleming, Linda Stanwood, EB5 Impact Advisors LLC (“EB5IA”), and EB5
 27 Impact Capital Regional Center (“EB5IC,” and collectively, the “LVDF Parties,” and together
 28 with Front Sight,, the “Parties”), by and through their counsel, Jones Lovelock, and LVDF, by and

1 through its counsel, the Law Office of Brian Shapiro hereby stipulate and agree as follows:

2 WHEREAS, on September 14, 2018, Debtor filed an action against the LVDF Parties in
3 the Eighth Judicial District Court, thereby commencing Case No. A-18-781084-B (the “State
4 Court Case”);

5 WHEREAS, on May 24, 2022 (the “Petition Date”), Debtor filed a voluntary petition under
6 chapter 11 of title 11 of the United States Code, thereby commencing bankruptcy case no. 22-11824-
7 abl (the “Chapter 11 Case”) in the United States Bankruptcy Court for the District of Nevada (the
8 “Bankruptcy Court”).

9 WHEREAS, on June 23, 2022, Debtor removed the State Court Case to the Bankruptcy Court,
10 thereby commencing adversary proceeding no. 22-01116-ABL (the “Adversary Proceeding”).

11 WHEREAS, on December 23, 2022, LVDF filed an amended proof of claim no. 284 (the
12 “LVDF Claim”), asserting a claim in the amount of \$12,682,008.55 with interest, costs, and attorneys’
13 fees accruing.

14 WHEREAS, on December 30, 2022, Front Sight filed its *Amended Objection to Claim No.*
15 *284 Filed by Las Vegas Development Fund, LLC* [ECF No. 628] (the “LVDF Claim Objection”)
16 pursuant to which the Front Sight objected to the LVDF Claim.

17 WHEREAS, the Bankruptcy Court has scheduled a bench trial for the LVDF Claim and
18 Adversary Proceeding for July 10, 13, 14, 18, and 20, 2023 (the “Trial Date”).

19 WHEREAS, on March 6, 2023, LVDF filed *Las Vegas Development Fund, LLC’s Motion*
20 *for Limited Protective Order* [ECF No. 736] (the “Motion”), which is scheduled to be heard on
21 March 24, 2023 at 9:30 a.m. [ECF No. 741].

22 WHEREAS, on March 16, 2023, Front Sight filed its opposition to the Motion [ECF No.
23 776].

24 WHEREAS, LVDF’s current deadline to file its reply in support of the Motion is March
25 21, 2023 [ECF No. 741].

26 WHEREAS, as of the date of this Stipulation, the following discovery with respect to the
27 LVDF Claim Objection and/or the Adversary Proceeding remains outstanding:

28 **1. Depositions**

- a. Deposition of Fed. R. Civ. P. 30(b)(6) Designee(s) of LVDF [ECF No. 728];
- b. Deposition of Robert Dziubla [ECF No. 732];
- c. Deposition of Simone Williams [ECF No. 730];
- d. Deposition of Prasantkumar Doriwala, Yuheng Geng, Nareshkumar Laxmanbhai Patel, Rajesh Liladhar Somaiya, Dhaval Sanat Patel, Tatiana Sarkisova Firmenich, Himansu Kansara, Siddarth Mandjkumar Shrivastava, Rajeev Sharma, Shu Zhang, Shibin Zheng, Guibin Zheng, Dong Ji, Zhiyong Ji, and Nareshkumar Gordhanbhai Sarasiya [ECF Nos. 762-775];
- e. Deposition of Ignatius Piazza [ECF No. 726].

2. **Written Discovery**

- a. Front Sight's responses to *Las Vegas Development's Fifth Request for Production of Documents*;
- b. Front Sight's responses to *Las Vegas Development's Sixth Request for Production of Documents*;
- c. Front Sight's Supplement to *Front Sight Management, LLC's Response to Las Vegas Development's Third Requests for Production of Documents*;
- d. Front Sight's Supplement to *Front Sight Management, LLC's Response to Las Vegas Development's Fourth Requests for Production of Documents*;
- e. LVDF's Supplement to *Las Vegas Development Fund, LLC's Response to Front Sight Management LLC's First Set of Requests for Production of Documents*;
- f. LVDF's Supplement to *Las Vegas Development Fund, LLC's Responses to Front Sight Management LLC's First Set of Interrogatories*;

WHEREAS, the Parties have met and conferred, and agreed to attend a settlement meeting (the "Settlement Meeting") and, in connection therewith, extend the discovery deadlines and deadlines in connection with the Motion as set forth herein:

NOW, THEREFORE, the Parties hereby stipulate and agree, subject to Bankruptcy Court approval, as follows:

1. The Parties shall attend a Settlement Meeting on March 29, 2023 commencing at

1 9:00 a.m.;

2 2. Discovery shall be stayed pending the Settlement Meeting;

3 3. The hearing on the Motion shall be continued from March 24, 2023 at 9:30 a.m. to
4 April 7, 2023 at 3:00 p.m.;

5 4. The deadline for LVDF to file its reply in support of the Motion shall be continued
6 from March 21, 2023 and April 4, 2023;

7 5. The Discovery deadlines shall be extended as follows:

8 a. All fact discovery will be completed by **May 15, 2023**.

9 b. If necessary, the Parties shall meet and confer as soon as practical after the
10 Settlement Meeting to reschedule the Depositions at mutually agreeable dates and times prior to
11 May 15, 2023.

12 c. If necessary, the Parties shall meet and confer as soon as practical after the
13 Settlement Meeting to confirm when supplemental responses to the Written Discovery will be
14 provided.

15 d. Initial expert reports shall be exchanged on or before **April 14, 2023**.
16 Rebuttal expert reports will be due thirty (30) calendar days after the initial expert report disclosure
17 deadline (*i.e.*, on or before May 15, 2023). All expert depositions shall be completed by **June 15,**
18 **2023**.

19 e. All potential dispositive motions should be filed on or before **May 22, 2023**,
20 with oppositions due on or before **June 12, 2023**, and replies due on or before **June 26, 2023**.

21 f. Final lists of witnesses and exhibits shall be filed and exchanged on or
22 before **June 12, 2023**.

23 g. Parties shall file objections to final witness and exhibit lists on or before
24 **June 26, 2023**.

25 h. Motions *in limine* shall be filed no later than **June 12, 2023**.

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1 i. Responses to motions *in limine* shall be filed no later than **June 26, 2023**.
2 Respectfully submitted:
3 DATED: March 22, 2023
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