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7 Attorneys for Province, LLC, solely in its capacity as
 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: April 13, 2023 Hearing Time: 9:30 a.m.</p>
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18 **STIPULATION RESOLVING TWELFTH OMNIBUS OBJECTION AS IT**
 19 **RELATES TO CLAIM 1059-1 FILED BY KENNETH D. HALE**

20 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee
 21 (the “Liquidating Trustee”) of the Front Sight Creditors Trust (the “Liquidating Trust”), on the one
 22 hand, and claimant Kenneth D. Hale (“Claimant”), on the other hand, hereby enter into this
 23 stipulation (the “Stipulation”) with regard to the following 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 January 16, 2023, Proof of Claim 1059-1 (“Claim 1059”) in the amount of a
 28 \$20,000.00 general unsecured claim was filed on behalf of Claimant.

1 C. On February 22, 2023, the Liquidating Trustee filed its twelfth omnibus objection to
2 claim [ECF No. 711] (the “12th Omnibus Objection”) pursuant to which the Liquidating Trustee
3 objected to Claim 1059 and sought to disallow the claim in its entirety.

4 D. On or around March 23, 2023, Claimant contacted counsel for the Liquidating
5 Trustee and provided additional evidence in support of his claim, including that Claimant mailed the
6 Claim prior to January 3, 2023.

7 E. After good faith discussions between the parties, the Liquidating Trustee has agreed
8 to allow Claim 1059 in the amount of a \$7,500.00 general unsecured claim.

9 **STIPULATION**

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

11 1. The foregoing recitals are incorporated herein in full by this reference.

12 2. Claim 1059 shall be allowed as a general unsecured claim in the amount of \$7,500.00
13 (the “Allowed Claim”) and disallowed to the extent that it asserts any amount over \$7,500.00.

14 3. Except for the Allowed Claim and the right to enforce this Stipulation and the order
15 approving this Stipulation, Claimant shall have no additional claim(s) against the Debtor, its estate,
16 the Liquidating Trust or the Liquidating Trustee arising from or relating to the facts alleged in Claim
17 1059.

18 4. To the extent that the 12th Omnibus Objection relates to Claim 1059, it is resolved
19 pursuant to this Stipulation.

20 5. Upon entry of the order approving this Stipulation, the Court clerk shall be directed to
21 modify and update the claim register in this case to reflect an allowed amount of a \$7,500.00 general
22 unsecured claim for Claim 1059.

23 6. The parties agree that signatures transmitted electronically, including, for example, by
24 email or facsimile, shall be original signatures for all purposes, and that multiple signed versions of
25 the Stipulation shall constitute one and the same instrument.

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1 7. The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce
2 this Stipulation and the order approving it.

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4 **THE FOREGOING IS AGREED:**

5 DATED: March 28, 2022

BG Law LLP

7 By: /s/ Jessica S. Wellington

8 Susan K. Seflin

Jessica S. Wellington

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

11
12 DATED: March 26 2022

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14 By: 
Kenneth D. Hale, 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 **March 28, 2023**, I served the following document:

STIPULATION RESOLVING TWELFTH OMNIBUS OBJECTION AS IT RELATES TO CLAIM 1059-1 FILED BY KENNETH D. HALE

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:

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(2) VIA E-Mail:

Ken Hale - khalemd54@gmail.com

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

Executed **March 28, 2023**, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY