

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

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><b>Hearing Date:</b> April 13, 2023  <b>Hearing Time:</b> 9:30 a.m.</p>
--	---

17

18 **STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT**  
 19 **RELATES TO CLAIM 1015-1 FILED BY DAEDALIAN TECHNOLOGIES, LTD.**

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 Daedalian Technologies, Ltd. (“Claimant”), on the other hand, by and through  
 23 their counsel, hereby enter into this 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 December 29, 2022, Claimant filed Proof of Claim 1015-1 (“Claim 1015”) in the  
 28 amount of a \$12,451.00 general unsecured claim.

1 C. On February 16, 2023, the Liquidating Trustee filed its eighth omnibus objection to  
2 claim [ECF No. 691] (the “8<sup>th</sup> Omnibus Objection”) pursuant to which the Liquidating Trustee  
3 objected to Claim 1015 and sought to disallow the claim to the extent it exceeds \$9,851.00.

4 D. After good faith discussions between the parties, the Liquidating Trustee has agreed  
5 to allow Claim 1015 in the amount of a \$9,851.00 general unsecured claim.

6 **STIPULATION**

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

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

9 2. Claim 1015 shall be allowed as a general unsecured claim in the amount of \$9,851.00  
10 (the “Allowed Claim”) and disallowed to the extent that it asserts any amount over \$9,851.00.

11 3. Except for the Allowed Claim and the right to enforce this Stipulation and the order  
12 approving this Stipulation, Claimant shall have no additional claim(s) against the Debtor, its estate,  
13 the Liquidating Trust or the Liquidating Trustee arising from or relating to the facts alleged in Claim  
14 1015.

15 4. To the extent that the 8<sup>th</sup> Omnibus Objection relates to Claim 1015, it is resolved  
16 pursuant to this Stipulation.

17 5. Upon entry of the order approving this Stipulation, the Court clerk shall be directed to  
18 modify and update the claim register in this case to reflect an allowed amount of a \$9,851.00 general  
19 unsecured claim for Claim 1015.

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

23 ///

24 ///

25 ///

26  
27  
28

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

3  
4 **THE FOREGOING IS AGREED:**

5 DATED: March 29, 2022

BG Law LLP

6  
7 By: /s/ Jessica S. Wellington

Susan K. Seflin

Jessica S. Wellington

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

11  
12 DATED: March 29, 2022

MINCIN LAW, PLLC

13  
14 By: /s/ David Mincin

David Mincin

15 Attorneys for Claimant Daedalian Technologies, Ltd.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 30, 2023**, I served the following document:

**STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT RELATES TO CLAIM 1015-1 FILED BY DAEDALIAN TECHNOLOGIES, LTD.**

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:**

- **JASON BLUMBERG** Jason.blumberg@usdoj.gov
- **CANDACE C CARLYON** ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com;nrodriguez@carlyoncica.com;9232006420@filings.docketbird.com;Dcica@carlyoncica.com
- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAWN M. CICA** dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- **WILLIAM C DEVINE** william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- **THOMAS H. FELL** tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- **PHILIP S. GERSON** Philip@gersonnvlaw.com
- **STEVEN T GUBNER** sgubner@bg.law, ecf@bg.law
- **RAMIR M. HERNANDEZ** rhernandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfiling@wrightlegal.net
- **MICHAEL R. HOGUE** hoguem@gtlaw.com, LVLitDock@GTLAW.com;flintza@gtlaw.com;andersonel@gtlaw.com;navarrom@gtlaw.com
- **JASON B KOMORSKY** jkomorsky@bg.law
- **BART K. LARSEN** BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- **NICOLE E. LOVELOCK** nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- **EDWARD M. MCDONALD** edward.m.mcdonald@usdoj.gov
- **DAVID MINCIN** dmincin@mincinlaw.com, cburke@mincinlaw.com
- **TRACY M. O’STEEN** tosteen@carlyoncica.com, crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com
- **TERESA M. PILATOWICZ** tpilatowicz@gtg.legal, bknotices@gtg.legal
- **SAMUEL A. SCHWARTZ** saschwartz@nvfirm.com, ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com
- **SUSAN K. SEFLIN** sseflin@bg.law
- **BRIAN D. SHAPIRO** brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- **STRETTO** ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **JESSICA S. WELLINGTON** jwellington@bg.law, ecf@bg.law

**(2) VIA E-Mail:**

David Mincin – dmincin@mincinlaw.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 30, 2023**, at Woodland Hills, California.

/s/ Jessica Studley  
JESSICA STUDLEY