

1 GARMAN TURNER GORDON LLP  
 2 GREGORY E. GARMAN, ESQ.  
 Nevada Bar No. 6665  
 E-mail: ggarman@gtg.legal  
 3 TALITHA GRAY KOZLOWAKI, ESQ.  
 Nevada Bar No. 9040  
 E-mail: tgray@gtg.legal  
 4 TERESA M. PILATOWICZ, ESQ.  
 Nevada Bar No. 9605  
 E-mail: tpilatowicz@gtg.legal  
 5 7251 Amigo Street, Suite 210  
 6 Las Vegas, Nevada 89119  
 Telephone (725) 777-3000  
 7 Facsimile (725) 777-3112  
 8

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  <b>Hearing:</b> Date: April 7, 2023 Time: 3:00 p.m.
---	---

16  
 17  
 18 **STIPULATION TO VACATE HEARING**

19 Reorganized Debtor Front Sight Management, LLC, a Nevada limited liability company  
 20 (“Debtor” or “Front Sight,” as applicable), by and through its counsel, Garman Turner Gordon  
 21 LLP, and Las Vegas Development Fund LLC, a Nevada limited liability company (“LVDF”),  
 22 Robert Dziubla, Jon Fleming, Linda Stanwood, EB5 Impact Advisors LLC (“EB5IA”), and EB5  
 23 Impact Capital Regional Center (“EB5IC,” and collectively, the “LVDF Parties,” and together  
 24 with Front Sight, the “Parties”), by and through their counsel, Jones Lovelock, and LVDF, by and  
 25 through its counsel, the Law Office of Brian Shapiro hereby stipulate and agree as follows:

26 WHEREAS, the LVDF Parties filed the following motions (the “Motions”), which are  
 27 scheduled for hearing (the “Hearing”) on April 7, 2023 at 3:00 p.m.: *Motion for Clarification*  
 28

1 *and/or Motion for Reconsideration* [ECF No. 141 in Adversary Case No. 22-01116-ABL]; *Motion*  
2 *to Allow Amendment to Proof of Claim* [ECF No. 665]; and *Las Vegas Development Fund, LLC's*  
3 *Motion for Limited Protective Order* [ECF No. 736]

4 WHEREAS, the Parties have agreed to a settlement, which they are currently in the process  
5 documenting, which resolves the pending Motions.

6 **NOW, THEREFORE**, the Parties hereby stipulate and agree, subject to Bankruptcy Court  
7 approval that Hearing on the Motions scheduled for April 7, 2023 at 3:00 p.m. may be vacated.

8 Respectfully submitted:

9 DATED: April 7, 2023

10  
11 GARMAN TURNER GORDON LLP

JONES LOVELOCK PLLC

12  
13 By: /s/ Teresa M. Pilatowicz  
14 GREGORY E. GARMAN, ESQ.  
15 TALITHA GRAY KOZLOWAKI, ESQ.  
16 TERESA M. PILATOWICZ, ESQ.  
17 7251 Amigo Street, Suite 210  
18 Las Vegas, Nevada 89119  
19 *Attorneys for Reorganized Debtor*  
20 *Front Sight Management LLC*

By: /s/ Andrea M. Champion  
Andrea M. Champion, Esq.  
Nicole E. Lovelock, Esq.  
JONES LOVELOCK  
6600 Amelia Earhart Court, Suite C  
Las Vegas, Nevada 89119  
*Attorneys for the LVDF Parties*

21  
22 LAW OFFICE OF BRIAN D. SHAPIRO, LLC

23  
24 By: /s/ Brian D. Shapiro  
25 Brian D. Shapiro, Esq.  
26 510 S. 8<sup>th</sup> Street  
27 Las Vegas, Nevada 89101  
28 *Attorneys for LVDF*