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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 <b><u>Hearing Date</u></b> Date: July 10, 13, 14, 18, and 20, 2023 Time: 9:30 a.m.
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 17 **STIPULATION TO VACATE TRIAL REGARDING LVDF CLAIM NO. 284**

18 Reorganized Debtor Front Sight Management, LLC, a Nevada limited liability company  
 19 (“Debtor” or “Front Sight,” as applicable), by and through its counsel, Garman Turner Gordon  
 20 LLP, and Las Vegas Development Fund LLC, a Nevada limited liability company (“LVDF”),  
 21 Robert Dziubla, Jon Fleming, Linda Stanwood, EB5 Impact Advisors LLC (“EB5IA”), and EB5  
 22 Impact Capital Regional Center (“EB5IC,” and collectively, the “LVDF Parties,” and together  
 23 with Front Sight,, the “Parties”), by and through their counsel, Jones Lovelock, and LVDF, by and  
 24 through its counsel, the Law Office of Brian Shapiro hereby stipulate and agree as follows:  
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26 WHEREAS, on September 14, 2018, Debtor filed an action against the LVDF Parties in  
 27 the Eighth Judicial District Court, thereby commencing Case No. A-18-781084-B (the “State  
 28 Court Case”);

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

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

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

10 WHEREAS, on December 30, 2022, Front Sight filed its *Amended Objection to Claim No.*  
11 *284 Filed by Las Vegas Development Fund, LLC* [ECF No. 628] (the “LVDF Claim Objection”)  
12 pursuant to which the Front Sight objected to the LVDF Claim.

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

15 WHEREAS, the Parties reached a settlement (the “Settlement”), and the Adversary  
16 Proceeding was dismissed on May 5, 2023.

17 WHEREAS, the LVDF Claim Objection has been resolved through the Settlement, and the  
18 Trial Date may be vacated.

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

3           1.       All pending deadlines and hearings with respect to the LVDF Claim Objection and  
4 Trial Date shall be vacated.

5 DATED: May 11, 2023

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7 GARMAN TURNER GORDON LLP

JONES LOVELOCK PLLC

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9 By: /s/ Teresa M. Pilatowicz  
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18 LAW OFFICE OF BRIAN D. SHAPIRO, LLC

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