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5 *Attorneys for the Reorganized Debtor*

6 **UNITED STATES BANKRUPTCY COURT**  
7 **DISTRICT OF NEVADA**

<p>8 In re:</p> <p>9 FRONT SIGHT MANAGEMENT LLC,</p> <p>10 Reorganized Debtor.</p>	<p>Case No.: 22-11824-ABL</p> <p>Chapter 11</p> <p>Hearing Date: August 14, 2023</p> <p>Hearing Time: 2:30 PM PDT</p>
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13 **NOTICE OF HEARING ON MOTION TO ENFORCE**  
14 **AND IMPLEMENT THE CONFIRMATION ORDER**

15 **TO: THE COURT, THE U.S. TRUSTEE, AND ALL PARTIES IN INTEREST:**

16 **PLEASE TAKE NOTICE** that the *Motion to Enforce and Implement the Confirmation*  
17 *Order* [ECF No. 828] (the “**Motion**”)<sup>1</sup> was filed on July 14, 2023, by Front Sight Management LLC,  
18 the reorganized debtor in the above-referenced Chapter 11 case (the “**Reorganized Debtor**”).

19 **Relief Requested:** The Reorganized Debtor seeks entry of an order, substantially in the form  
20 attached as Exhibit 1 to the Motion: (i) authorizing and directing any title company, title insurer,  
21 insurer, creditor, bank, institution, or any other party to rely on the Confirmation Order and/or Plan  
22 to conclude that all other claims, liens, and encumbrances against the Reorganized Debtor’s Property  
23 or against any other property of the Debtor’s Estate, including, but not limited to, the Enumerated  
24 Encumbrances, unless expressly preserved in the Confirmation Order, are thereby stripped and  
25 removed against the Reorganized Debtor’s Property and against any other property of the Debtor’s  
26 Estate; and (ii) authorizing and directing any title company, title insurer, creditor, bank, institution,

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28 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1 or other third party to rely on the order granting the Motion, the Confirmation Order, and/or Plan to  
2 execute, deliver, file, or record any document, or to take any action necessary to implement,  
3 consummate, and otherwise effect the terms of the Confirmation Order and/or Plan, which  
4 authorization includes, but is not limited to, issuing a new title policy against the Reorganized  
5 Debtor's Property which removes the Enumerated Encumbrances as exceptions to title.

6 **PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief  
7 sought in the Motion, or if you want the Court to consider your views on the Motion, then you must  
8 file a written opposition with the Court, and serve a copy on the undersigned attorneys who sent you  
9 this notice, *no later than fourteen (14) days* preceding the hearing date for the Motion, unless an  
10 exception applies (see Local Rule 9014(d)(3)). The opposition must state your position, set forth all  
11 relevant facts and legal authority, and be supported by affidavits or declarations that conform to  
12 Local Rule 9014(c).

13 **PLEASE TAKE FURTHER NOTICE** that if an opposition is not timely filed and served,  
14 an order for the aforementioned Motion and request for relief may be granted.

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16 If you object to the relief requested, you *must* file a **WRITTEN** response to this  
17 pleading with the Court. You *must* also serve your written response on the undersigned  
attorneys who sent you this notice.

18 If you do not file a written response with the Court, or if you do not serve your written  
19 response as set forth herein, then:

- 20 1. The Court may *refuse to allow you to speak* at the scheduled hearing; and  
21 2. The Court may *rule against you* without formally calling the matter at the hearing.  
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23 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion will be held on  
24 **August 14, 2023, at 2:30 PM PDT**, before the Honorable United States Bankruptcy Chief Judge  
25 August B. Landis. Parties are permitted to appear telephonically by dialing **(669) 254-5252** and  
26 entering meeting ID **161 110 6049** and access code or passcode **154251#**.

27 If you intend to participate at this hearing, please check the Court's website prior to the  
28 hearing for any updated instructions relating to the court participation number and access code. You

1 may view the Court Calendar at: <https://www.nvb.uscourts.gov/calendars/court-calendars/>. Select  
2 the calendar date that the Motion is set to be heard. Next, click on the hearing judge to view the  
3 hearing judge's dial-in number, meeting ID, and access code.

4 Dated: July 14, 2023.

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6 SCHWARTZ LAW, PLLC

7 By: /s/ Samuel A. Schwartz  
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10 *Attorneys for the Reorganized Debtor*  
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