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7 *Attorneys for the Reorganized Debtor*

8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF NEVADA**

10 In re:
11 FRONT SIGHT MANAGEMENT LLC,
12 Reorganized Debtor.

Case No.: 22-11824-ABL
Chapter 11
Hearing Date: September 26, 2023
Hearing Time: 1:30 PM PDT

14 **NOTICE OF REMOTE HEARING ON RENEWED MOTION TO ENFORCE**
15 **AND IMPLEMENT THE CONFIRMATION ORDER**

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

17 **PLEASE TAKE NOTICE** that the *Renewed Motion to Enforce and Implement the*
18 *Confirmation Order* [ECF No. 843] (the “**Motion**”)¹ was filed on August 22, 2023, by Front Sight
19 Management LLC, the reorganized debtor in the above-referenced Chapter 11 case (the
20 “**Reorganized Debtor**”).

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

27 _____
28 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1 removed against the Reorganized Debtor's Property and against any other property of the Debtor's
2 Estate; and (ii) authorizing and directing any title company, title insurer, creditor, bank, institution,
3 or other third party to rely on the order granting the Motion, the Confirmation Order, and/or Plan to
4 execute, deliver, file, or record any document, or to take any action necessary to implement,
5 consummate, and otherwise effect the terms of the Confirmation Order and/or Plan, which
6 authorization includes, but is not limited to, issuing a new title policy against the Reorganized
7 Debtor's Property which removes the Enumerated Encumbrances as exceptions to title.

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

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

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

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

- 22 1. The Court may *refuse to allow you to speak* at the scheduled hearing; and
 - 23 2. The Court may *rule against you* without formally calling the matter at the hearing.
- 24

25 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion will be held
26 remotely via ZoomGov on **September 26, 2023, at 1:30 PM PDT**, before the Honorable United
27 States Bankruptcy Chief Judge August B. Landis. Hearing information may be obtained at the
28 following link on the Court's website: <https://www.nvb.uscourts.gov/case-info/mega-cases/front->

1 sight-management/. If you wish to speak at the hearing, please contact the courtroom deputy by
2 sending an e-mail with your request to: abl_cd@nvb.uscourts.gov.

3 If you intend to participate at this hearing, please check the Court's website prior to the
4 hearing for any updated instructions. You may view the Court Calendar at:
5 <https://www.nvb.uscourts.gov/calendars/court-calendars/>. Select the calendar date that the Motion
6 is set to be heard. Next, click on the hearing judge to view the hearing judge's hearing calendar.

7 Dated: August 22, 2023.

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9 SCHWARTZ LAW, PLLC

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