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12 Attorneys for Province, LLC, solely in its capacity as
 13 the Liquidating Trustee of the Front Sight Creditors Trust

14 **UNITED STATES BANKRUPTCY COURT**
 15 **FOR THE DISTRICT OF NEVADA**

<p>16 In re:</p> <p>17 Front Sight Management LLC,</p> <p>18 Debtor.</p>	<p>19 Case No. 22-11824-abl</p> <p>20 Chapter 11</p> <p>21 Hearing Date: September 26, 2023 Hearing Time: 1:30 p.m.</p>
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22 **DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF LIQUIDATING**
 23 **TRUSTEE’S MOTION FOR ENTRY OF AN ORDER EXTENDING**
 24 **THE CLAIM OBJECTION DEADLINE TO NOVEMBER 27, 2023**

25 I, Amanda Demby Swift, hereby declare as follows:

26 1. I am a principal of Province, LLC, the duly appointed liquidating trustee
 27 (“Liquidating Trustee”) for the Front Sight Creditors Trust (the “Trust”), and I am the individual
 28 charged with acting on the Liquidating Trustee’s behalf. In my capacity in serving on behalf of the
 Liquidating Trustee, I am responsible for overseeing and generally managing the Trust’s efforts to
 maximize the value of the estate for distributions to holders of allowed general unsecured claims.

1 2. Except as otherwise indicated, all statements herein are based on my personal
2 knowledge, my review of Front Sight Management LLC’s (the “Debtor”) books and records, and/or
3 my opinion based upon my experience and knowledge of the matters at issue. I am over 18 years of
4 age, and if called upon to testify, I could and would competently testify to each of the facts set forth
5 herein based on my personal knowledge, review of the documents, or opinion.

6 3. I make this declaration in support of the *Liquidating Trustee’s Motion for Entry of an*
7 *Order Extending the Claim Objection Deadline to November 27, 2023* (the “Motion”) filed
8 concurrently herewith. If called upon to testify, I could and would testify competently to the facts
9 set forth in this Declaration and the Motion. I am authorized to submit this Declaration on the
10 Liquidating Trustee’s behalf. Any capitalized term not defined in this Declaration has the same
11 meaning ascribed to it in the Motion.

12 4. Pursuant to the Confirmation Order, the current deadline in this case for filing
13 objections to proofs of claim is February 28, 2023 (the “Objection Deadline”). However, the Plan
14 itself provided for a claim objection deadline that was 180 days after the Effective Date (or May 31,
15 2023). I.e., the Confirmation Order included an incorrect Objection Deadline for filing objections to
16 proofs of claim.

17 5. On February 23, 2023, the Liquidating Trustee filed a motion for entry of an order
18 extending the Objection Deadline to August 28, 2023 [ECF No. 718], which was granted by the
19 Court [ECF No. 816]. Accordingly, the current Objection Deadline is August 28, 2023.

20 6. The Liquidating Trustee and its agents and professionals have made significant
21 progress in resolving the disputed general unsecured claims in this case. Approximately 1,073
22 proofs of claim have been filed against the Debtor and over 2,900 claims were scheduled by the
23 Debtor in its Schedule of Assets and Liabilities. The vast majority of the proof of claim were filed
24 by pre-petition members of the Debtor.

25 7. As of the filing of this Motion, the Liquidating Trustee has filed nine omnibus claim
26 objections [ECF Nos. 691, 695, 700, 709, 711, 713, 832, 833, and 834] since its appointment (and a
27 total of sixteen omnibus objections have been filed to date in this case).

28 8. Many of the Debtor’s pre-petition members filed their claims based on the amount of


1 their member rewards, rather than the amount they paid to the Debtor. The Liquidating Trustee does
2 not object to the Debtor's pre-petition members having a claim against the Debtor for the amounts
3 they paid to the Debtor. However, reviewing the proofs of claim and comparing them to the
4 Debtor's records takes a significant amount of time.

5 9. While the Liquidating Trustee and its agents and professionals have made substantial
6 progress towards reconciling the claims filed against the Debtor, the Liquidating Trustee anticipates
7 filing more claim objections and thus requires additional time to complete the claim objection
8 process. An extension of the Objection Deadline will ensure a thorough analysis of each of the
9 claims in this case and will hopefully provide the Liquidating Trustee with sufficient time to resolve
10 all disputed claims.

11 10. I believe that a ninety (90) day extension of the Objection Deadline will likely
12 provide enough time for my team and I to resolve the outstanding claim objections, to prepare a final
13 distribution chart in this case and to make final distributions.

14 I declare under the penalty of perjury of the laws of the United States of America that the
15 foregoing is true and correct.

16 Executed on this 25 day of August, 2023 in Los Angeles, California.

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Amanda Demby Swift