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 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: March 12, 2024 Hearing Time: 1:30 p.m.</p>
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22 **LIQUIDATING TRUSTEE’S MOTION FOR AN ORDER IN AID OF IMPLEMENTATION**
 23 **OF CONFIRMED CHAPTER 11 PLAN OF REORGANIZATION DEEMING UNCLAIMED**
 24 **DISTRIBUTIONS TO CERTAIN HOLDERS OF ALLOWED CLAIMS TO BE FORFEITED**
 25 **TO THE LIQUIDATING TRUST PURSUANT TO 11 U.S.C. §§ 105(a) AND 1142 AND**
 26 **BANKRUPTCY RULE 3020(d)**

27 ****AFFECTED CLAIMS ARE LISTED ALPHABETICALLY BY INDIVIDUAL CREDITOR’S**
 28 **LAST NAME, OR BUSINESS FIRST NAME, IN “EXHIBIT 1” ATTACHED HERETO****

****IF YOU ARE RECEIVING THIS MOTION VIA EMAIL OR REGULAR MAIL, PLEASE**
READ THE ENTIRE MOTION AND EXHIBIT 1 AS IT MAY AFFECT YOUR RIGHTS**

Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee (the “Liquidating Trustee”)¹ of the Front Sight Creditors Trust (the “Trust”), hereby files this motion (the “Motion”) for entry of an order under Sections 105(a)² and 1142, Bankruptcy Rule 3020(d), Local Rule 3011.1, and pursuant to the plan confirmed in this case, deeming unclaimed distributions to certain holders of allowed claims to be deemed forfeited to the Trust for the claimants’ failure to comply with the terms of the confirmed plan and liquidating trust agreement by failing to complete and return a W-9 (or W-8 where applicable) to the Liquidating Trustee.

The Motion pertains to the claims (the “Affected Claims”) of each of the creditors (the “Affected Creditors”) set forth in **Exhibit 1** attached hereto. **Exhibit 1** lists the Affected Creditors alphabetically by the Affected Creditors’ last name, or first name for businesses, and shows the claim number for, and the amount of, each of the Affected Claims.³

This Motion is made and based upon the following Memorandum of Points and Authorities, the concurrently filed declaration of Amanda Demby Swift (“Swift Decl.”), the papers, pleadings, and other documents on file with the clerk of the Court, and judicial notice of which is respectfully requested pursuant to Federal Rule of Evidence 201, and such other and further evidence as may be provided at the hearing on the Motion.

MEMORANDUM OF POINTS AND AUTHORITIES

I. JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and Local Rule 1001(b)(1). Additionally, Section III.F of the confirmed *Debtor’s Second Amended Chapter 11 Plan of Reorganization* [ECF No. 405] (together with any and all amendments thereto, all exhibits and schedules thereto and all documents incorporated by reference therein including all supplements, the “Plan”) and paragraph AA of the *Findings of Fact, Conclusions of*

¹ Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of reorganization and order thereon, the Liquidating Trustee is overseeing and administering general unsecured claims and distributions thereon.

² References to “Section” refer to the Bankruptcy Code (11 U.S.C. §§ 101 et seq.); references to “Bankruptcy Rule” refer to the Federal Rules of Bankruptcy Procedure; and references to “Local Rule” refer to the Local Bankruptcy Rules.

³ The Affected Claims of the Affected Creditors total, in the aggregate, approximately \$1.58 million.

1 *Law, and Order Confirming the Debtor’s Second Amended Chapter 11 Plan of Reorganization* [ECF
2 No. 556] (the “Confirmation Order”), specifically provide this Court with jurisdiction to consider the
3 Motion.

4 2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

5 3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

6 4. The statutory predicates for the relief sought herein are Sections 105(a) and 1142,
7 Bankruptcy Rule 3020(d), and Local Rule 3011.1.

8 5. As required by Local Rule 9014.2, the Liquidating Trustee consents to the entry of
9 final orders or judgments by this Court if it is determined that this Court, absent consent of the
10 parties, cannot enter final orders or judgments consistent with Article III of the United States
11 Constitution.

12 **II. BACKGROUND**

13 6. On May 24, 2022, the Debtor filed a voluntary petition for relief under chapter 11 of
14 the Bankruptcy Code [ECF No. 1].

15 7. On June 15, 2022, the Debtor filed its Schedule of Assets and Liabilities [ECF No.
16 137] (the “Schedules”). The Schedules list over 2,900 general unsecured claims against the Debtor.

17 8. In addition, at least 1,073 proofs of claim have been filed against the Debtor. The
18 vast majority of these claims were filed by pre-petition members of the Debtor and arise out of
19 money they paid for memberships and/or related member rewards.

20 9. On November 29, 2022, the Court entered the Confirmation Order confirming the
21 Plan pursuant to which the “Reorganized Debtor” has new ownership and membership as of the
22 effective date of the Plan. The effective date of the plan was December 2, 2022 [ECF No. 584].

23 10. Pursuant to the Confirmation Order and *Liquidating Trust Agreement* [ECF No. 553]
24 (“Liquidating Trust Agreement”), the Trust was created to, among other things, oversee and
25 administer general unsecured claims, objections thereto, and ultimately distributions on allowed
26 general unsecured claims. Province, LLC was appointed as the Liquidating Trustee of the Trust.

27 11. The Liquidating Trustee has objected to all of the objectionable general unsecured
28 claims and thereby reduced the outstanding claims against the estate significantly.

1 12. A distribution from the Trust is anticipated to be made by the first or second quarter
2 of 2024. In relevant part, under the Plan, an unclaimed distribution is defined as:

3 (d) disbursements that were not made because the Holder of such
4 Allowed Claim failed to provide required tax information within forty-
5 five (45) days after the Reorganized Debtor has sent any request for
6 same to such Claimant’s address as reflected in the Schedules and/or
7 such Claimant’s Proof of Claim.

8 Plan, Section III.I.3, p. 38.

9 13. Pursuant to the Confirmation Order and Liquidating Trust Agreement, any unclaimed
10 distribution attributable to an allowed general unsecured claim shall be forfeited to the Trust.

11 Confirmation Order, ¶ 28(c), p. 25.

12 14. Since November 2023, the Liquidating Trustee has, through the Debtor’s noticing and
13 claims agent Stretto, mailed and/or emailed at least five notices to each of the Affected Creditors
14 notifying them of their obligation to provide completed W-9’s (or, if applicable W-8’s) to the
15 Liquidating Trustee. The correspondence also notified the Affected Creditors that their respective
16 claims would be forfeited unless they provided this information to the Liquidating Trustee.

17 15. None of the Affected Creditors has provided the requested taxpayer identification
18 information to the Liquidating Trustee. As evidenced by the concurrently filed Swift Decl., the
19 Liquidating Trustee sent such written notices to the Affected Creditors by letters and/or email on or
20 about the following dates: (1) November 10, 2023; (2) December 15, 2023; (3) January 3, 2024; (4)
21 January 8, 2024; (5) January 10, 2024; and (6) January 24, 2024. Swift Decl. ¶¶ 8–16.

22 Nevertheless, none of the Affected Creditors has provided its taxpayer identification number to the
23 Liquidating Trustee. Swift Decl., ¶ 17.

24 16. In this regard, the Liquidating Trustee, via Stretto, sent a letter to the Affected
25 Creditors on November 10, 2023, via first-class mail and/or email. A true and correct copy of the
26 November 10, 2023, letter is attached as **Exhibit A** to the Swift Decl. This letter included the
27 following:

28 Under the terms of the Plan, the Trustee will make distributions of
available case on account of claim(s) that have been “Allowed” against
the Debtor (as defined in the Plan) from certain escrow accounts

1 established under the Plan. **However, in order for you to receive a**
2 **distribution from the Trust, you must complete a W-9 (or W-8)**
3 **and return it to the Trustee.** The Trustee intends to commence
4 distributions and requires this information to make any such cash
5 distribution. **I.e., if you are entitled to a distribution from the Trust**
6 **on account of an “Allowed” claim, you must read and respond to**
7 **this letter with your W-9 (or W-8).**

8 In compliance with IRS rules for tax reporting (Internal Revenue
9 Service Revenue Procedure 94-45, 1994-2 C.B. 684, and Treasury
10 Regulations Sections 301.7701-4(d)), and as set forth under the Plan,
11 you are required to provide the Trustee with a Taxpayer Identification
12 Number (“TIN”) using the enclosed Form W-9 (or, if applicable, a W-
13 8 Form). **If you are an individual, your TIN is your social security**
14 **number.** If you are a business, your TIN is in most cases your
15 employer identification number.

16 Per the IRS rules, a holder of an Allowed claim must provide the
17 Trustee with its TIN to receive a distribution. If a holder of an Allowed
18 claim fails to do so by **December 28, 2023**, its distribution may be
19 treated as an unclaimed and undeliverable distribution, and its
20 distribution and all future distributions may be subject to forfeiture. IF
21 YOU DO NOT RETURN THE ENCLOSED W-9 (OR, IF
22 APPLICABLE, W-8) TO THE TRUSTEE, YOU WILL NOT BE
23 ENTITLED TO RECEIVE A DISTRIBUTION ON YOUR
24 ALLOWED CLAIM.

25 **To avoid forfeiting your right to distributions, if any, please return**
26 **your completed Form W-9 (or, if applicable, a completed W-8**
27 **Form) to Amanda Swift by mail to:**

28 Front Sight Liquidating Trust
c/o Province, LLC
Attn: Amanda Swift
11111 Santa Monica Blvd. Suite 525
Los Angeles, CA 90025

Forms can also be submitted by email to
frontsight_claims@provincefirm.com.
(frontsite_claims@provincefirm.com)

Please take notice that your failure to provide a completed Form
W-9 (or, if applicable, a completed Form W-8) that includes your
TIN **by no later than December 10, 2023** will result in loss of any
right you may have to receive any current or future distribution
under the Plan.

Swift Decl., Exhibit A (emphasis in original).

1 17. The Liquidating Trustee sent, through Stretto, substantially the same notice as
2 contained in the November 10, 2023, letter by two additional letters to each of the Affected Creditors
3 via first-class mail, including one on December 15, 2023, and one on January 8, 2024, true and
4 correct copy of each is attached to the Swift Decl., respectively, as **Exhibit B** and **Exhibit C**. The
5 December 15, 2023, letter was also sent via email to each Affected Creditor for which the
6 Liquidating Trustee has a valid email address on file. Swift Decl., ¶ 10.

7 18. In addition, the Liquidating Trustee sent, through Stretto, three separate emails to the
8 Affected Creditors reminding them of their obligation to submit their taxpayer identification number
9 to the Liquidating Trustee as a condition to receiving any distribution under the Plan and providing
10 the Affected Creditors with a link to the required forms (to make the process easier for the Affected
11 Creditors). The first of these emails was sent on January 3, 2024, which provided:

12 Front Sight Creditor –

13 You have a claim in the Front Sight bankruptcy case. To date, the
14 Liquidating Trustee in the Front Sight bankruptcy case has not
15 received a W-9 form (or W-8 if you are a citizen of a foreign country)
16 from you. Please fill out the correct form and submit the form
17 electronically with the links below. **If the liquidating trustee does
not receive a completed W-9 (or W-8) form from you, then you
will not receive any distribution.**

18 **Link to complete a W-9 Form**

19 **Link to complete a W-8 Form**

20 **Link to upload a completed PDF copy of either form**

21
22 Swift Decl. ¶ 11 (emphasis in original). A true and correct copy of the January 3, 2024, email is
23 attached as **Exhibit D** to the Swift Decl. To the extent that the Liquidating Trustee and Stretto did
24 not have a valid email address for an Affected Creditor, the notice was sent to the creditor via first-
25 class mail. Swift Decl., ¶ 14.

26 19. The Liquidating Trustee, via Stretto, sent substantially the same notice as contained in
27 the January 3, 2024, email by two additional emails to each of the Affected Creditors, including one
28 on January 10, 2024, and one on January 24, 2024, which are attached to the Swift Decl.,

1 respectively, as **Exhibit E** and **Exhibit F**. To the extent that the Liquidating Trustee and Stretto did
2 not have a valid email address for an Affected Creditor, these notices were sent to the creditor via
3 first-class mail. Swift Decl., ¶ 15.

4 **III. RELIEF REQUESTED**

5 20. The Liquidating Trustee seeks entry of an order substantially in the form of the
6 Proposed Order attached hereto as **Exhibit 2** and (i) granting the Motion, (ii) decreeing that each of
7 the Affected Claims was forfeited, (iii) decreeing that the amount of any and all distributions (as
8 defined in the Plan) in respect of such Affected Claims shall be property of the Trust, free of any
9 restrictions thereon, and (iv) granting such other and further relief as the Court deems appropriate
10 and just.

11 **IV. BASIS FOR RELIEF**

12 21. While the Liquidating Trustee does not believe that it is required to file a Motion to
13 deem the Affected Claims forfeited, the Liquidating Trustee has done so to ensure that there is a
14 Court record of the forfeiture of the Affected Claims and to give the Affected Creditors notice
15 thereof. The Liquidating Trustee submits that the relief requested herein is a fair and efficient
16 mechanism for facilitating the implementation of the Plan and dealing with the unclaimed
17 distributions, and is necessary to carry out the purposes and effects of the Plan.

18 22. Both the Bankruptcy Code and the Bankruptcy Rules provide the Court with the
19 authority to grant the relief requested by this Motion. Section 105 provides that the bankruptcy court
20 “may issue any order . . . that is necessary or appropriate to carry out the provisions” of Title 11. 11
21 U.S.C. § 105(a). Furthermore, Section 1142 provides that the Bankruptcy Court may direct any
22 necessary party to perform any act necessary for the consummation of a plan of reorganization. 11
23 U.S.C. § 1142(b); *In re Terracor*, 86 B.R. 671, 676 (D. Utah 1988) (“The clear intent of section
24 1142(b) is for the court to retain its jurisdiction to assure that the terms and provisions of the
25 confirmed Chapter 11 plan are carried out until the plan is completed and a final decree is entered
26 closing the case.”).

27 23. Further, Bankruptcy Rule 3020(d) provides that, notwithstanding the entry of an order
28 confirming a chapter 11 plan, “the court may issue any other order necessary to administer the

1 estate.” Fed. R. Bankr. P. 3020(d). In addition, the Plan specifically retains to the Court the
2 jurisdiction and authority to issue orders pertaining to distributions pursuant to the Plan. Section
3 III.F of the Plan provides that the Court has shall retain jurisdiction to construe and take any action
4 to enforce the Plan, the Confirmation Order, and any other order of the Court that may be necessary
5 or appropriate for the implementation of the Plan and Confirmation Order.

6 24. Moreover, Local Rule 3011.1(c)(2) provides that a chapter 11 liquidating plan may
7 provide that any undistributable funds may be redistributed to other creditors identified in the plan.
8 Here, the Confirmation Order Liquidating Trust Agreement identified that any unclaimed
9 distributions would be forfeited to the Trust. Although the Plan, Confirmation Order, and
10 Liquidating Trust Agreement identified the disposition of unclaimed distributions and a motion may
11 not be necessary pursuant to the Local Rules, the Liquidating Trustee filed this Motion out of an
12 abundance of caution.

13 25. Accordingly, the Court has the authority to grant the relief requested herein. The
14 Court’s consideration of this Motion is one of the final matters to be addressed in connection with
15 the administration of the Trust. The Liquidating Trustee anticipates that relatively soon after the
16 resolution of this Motion and certain other remaining matters, the Trustee will be in a position to
17 make a distribution to holders of allowed unsecured claims (other than those listed in Exhibit 1 to the
18 Proposed Order, in the event this Motion is granted) and thereafter request a final decree closing the
19 chapter 11 case.

20 **V. NOTICE**

21 26. Stretto will serve notice of this Motion and the Motion via email on each Affected
22 Creditor. In the event that the Claims Noticing Agent does not have a valid email address for the
23 Affected Creditor, the notice of the Motion and Motion will be served via US mail.

24 27. In light of the circumstances and the relief requested herein, the Liquidating Trustee
25 submits that no other or further notice is required under the circumstances.

26 **VI. CONCLUSION**

27 Based on the foregoing, the Liquidating Trustee respectfully requests that the Court enter an
28 order substantially in the form of the Proposed Order attached hereto as Exhibit 2 and (i) granting

1 the Motion, (ii) decreeing that each of the Affected Claims was forfeited, (iii) decreeing that the
2 amount of any and all distributions (as defined in the Plan) in respect of such Affected Claims shall
3 be property of the Trust, free of any restrictions thereon, and (iv) granting such other and further
4 relief as the Court deems appropriate and just.

5 DATED: February 13, 2024

BG Law LLP

6
7 By: /s/ Susan K. Seflin
8 Susan K. Seflin
9 Jessica S. Wellington
10 Attorneys for Province, LLC, solely in its capacity as
11 the Liquidating Trustee of the Front Sight Creditors
12 Trust
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EXHIBIT 1

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
1	ADAMSON, KIM	2402906		\$350,000.00
2	ALLEN, DARLENE	2402919		\$3,000.00
3	ANGEL, RAFAEL	2402941		\$48,000.00
4	AVANT, IRA M. [AVANT, MIKE]	8-1	5/26/2022	\$10,000.00
5	BANNING, DARRELL	2402996		\$6,000.00
6	BARRANCO, ROGER	2403020		\$18,006.00
7	BELL, TIMOTHY	2403047		\$3,000.00
8	BLEVINS, JOHN	2403108		\$3,000.00
9	BOYER, TERRY	2403149		\$6,000.00
10	BROWN, RICHARD	2403193		\$6,000.00
11	CAMPBELL, ROBERT	745-1	10/31/2022	\$3,995.00
12	CART, CURTIS	2403258		\$3,000.00
13	CHONG, GEORGE	599-1	10/19/2022	\$2,995.00
14	CLARRY, KEITH	2403315		\$9,003.00
15	COCO, RONNIE	2403338		\$6,000.00
16	COOPER, MICHAEL (Texas)	2403382		\$1,500.00
17	COVE, NORMAN	2403392		\$3,000.00
18	CRANMER, ROSS	2403397		\$6,000.00
19	CRAWLEY, HENRY	2403395		\$5,003.00
20	DABBS, VAUGHAN	925-1	11/14/2022	\$24,000.00
21	DAVIS, BRIAN	2403448		\$6,000.00
22	DEARTH, CYNTHIA	2403468		\$12,000.00
23	DOBBS, EDWARD	2403512		\$24,000.00
24	DYER, ROBERT	2403564		\$6,000.00
25	EBRIGHT, SCOTT	2403573		\$24,000.00
26	ECKENROTH, WILLIAM	2403569		\$6,000.00
27	EMBAUGH, TERRY	2403607		\$6,000.00
28	ESPINOSA, RANDALL	2403621		\$3,000.00
29	FAN, KEN	258-2	1/2/2023	\$18,118.00
30	FEILD, JAKE	623-1	10/23/2022	\$2,500.00
31	FELIX, TED	2403657		\$3,000.00
32	FISCHER, DANIEL	2403689		\$2,500.00
33	FOGLE, RODNEY	2403693		\$3,000.00
34	FORMAN, PATRICIA	146-2	6/14/2022	\$3,342.00
35	FRY, THOMAS	2403732		\$3,000.00
36	GABRIELSON, DANIEL	2403731		\$3,000.00
37	GALLO, TIMOTHY	2403747		\$35,000.00
38	GEYER, DON	2403787		\$12,000.00
39	GOEKEN, ANTHONY	2403815		\$3,000.00
40	GREEN, DARIUS	2403845		\$3,000.00
41	GREENWALD, ROBERT	2403862		\$6,000.00
42	GREGORY, JOHN	718-1	10/30/2022	\$2,397.00
43	GRONINGER, CRAIG	2403868		\$3,000.00
44	GROOTERS, RONALD	2403885		\$6,000.00
45	GUICHARD, MICHEL	2403891		\$3,000.00

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
46	GULDE, CHRISTIAN	481-1	10/11/2022	\$3,642.00
47	GUNCRAFTERS	2403888		\$2,662.00
48	HELWIG, LELAND	2404001		\$12,000.00
49	HENSLEY, LINDA C	356-1	10/5/2022	\$2,700.00
50	HOGSETT, ROGER	2404056		\$6,000.00
51	HORNEY, EDWIN	2404068		\$3,000.00
52	HOWARD, WILLIAM	2404072		\$3,000.00
53	JACKSON, RICHARD	2404124		\$6,000.00
54	JANNUZZI, CHRISTIAN	843-1	11/3/2022	\$5,272.00
55	JOHNSON, ROBERT	2404173		\$6,000.00
56	JORGENSEN, STEVEN	2404197		\$500.00
57	KAPLER, JOHN	2404214		\$7,500.00
58	KEIM, JEFF	2404252		\$6,000.00
59	KONRAD, PETER [DANELLE, JORDAN, GARRETT & AMANDA KONRAD]	477-1	10/11/2022	\$2,894.00
60	KOPLOW, STEVEN	2404301		\$13,268.00
61	KWANG, DANIEL	2404336		\$6,000.00
62	LAIRD, WILLIAM	2404324		\$33,503.00
63	LANGO, RICHARD	2404368		\$3,000.00
64	LEMAY, ARMAND	2404408		\$3,000.00
65	LEWIS, DAVID CLYDE	20-1	5/27/2022	\$7,020.00
66	LIPPMANN, ROBERT	1065-1	2/15/2023	\$5,000.00
67	LOCKE, DAVID	2404430		\$9,003.00
68	LOGIUDICE, ERIC	2404445		\$6,000.00
69	LOVERING, GENE	2404437		\$24,000.00
70	MACARTHUR, ROBERT	2404453		\$6,000.00
71	MACDONALD, PAUL	830-1	11/3/2022	\$13,996.00
72	MACIAS, CHARLENE	2404452		\$6,000.00
73	MADDOX, DENIS	2404455		\$3,000.00
74	MALONE, PETER THEODORE	35-1	5/27/2022	\$3,317.00
75	MARCH, JOHN	2404486		\$24,000.00
76	MARMAN, LUKE	2404492		\$6,000.00
77	MCCAMBRIDGE, WARREN	2404537		\$6,000.00
78	MCCARTHY, ANTHONY	2404558		\$3,000.00
79	MCINTYRE, GENE	2404585		\$3,000.00
80	MCKEE, JEFF	2404563		\$4,500.00
81	MCNEELY, JAMES	2404571		\$6,000.00
82	MERRELL, LESLIE	2404601		\$3,000.00
83	MERTZ, EUGENE	2404610		\$3,500.00
84	MONROE, BASIL	2404656		\$6,000.00
85	MYERS, RICHARD	2404700		\$3,000.00
86	NESSEN, STEVEN	109-1	6/4/2022	\$5,000.00
87	NEWPORT, SHAWN	2404777		\$3,000.00
88	ORNDORFF, ALAN	2404819		\$4,500.00
89	PALMER, JOHN (California)	2404840		\$1,500.00

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
90	PAPAIAI, HAIG	2404843		\$35,000.00
91	PARSONS, JAMES	2404836		\$6,000.00
92	PATSCH, JACK	2404842		\$6,000.00
93	PAUL THOMPSON BRICKER	497-1	10/12/2022	\$4,191.00
94	PEASE, MARTIN	2404838		\$3,000.00
95	PENDLEY, LEMAN W	98-1	6/3/2022	\$20,041.80
96	PETRONE, STEVEN	2404907		\$6,000.00
97	PILUSO, DOM	2404890		\$7,500.00
98	PINCKERT, THOMAS	369-1	10/6/2022	\$9,000.00
99	POLLOCK, PETER	498-1	10/12/2022	\$2,596.00
100	PRESTON ARZA LLP	2404963		\$72,444.60
101	PURDY, STEVEN	2404960		\$5,000.00
102	RAMIREZ, JACK	2404959		\$3,000.00
103	RANDOLPH, MICHAEL	2405004		\$6,000.00
104	RAPPLEYE, JACOB	2405006		\$3,000.00
105	RAYMER, LEIGHTON	2404978		\$6,000.00
106	ROBERTSON, JAMES (Utah)	2405042		\$500.00
107	RODERICK, STACY	944-1	11/18/2022	\$4,997.00
108	RYAN, JAMES	2405100		\$3,000.00
109	SARDELLA, CRAIG	2405157		\$6,000.00
110	SCHAEFFER, JAMES	2405168		\$35,000.00
111	SCHIEBER, CEDRIC	2405178		\$3,000.00
112	SEYMOUR, JOHN	2405205		\$3,500.00
113	SGARLATTI, ANTHONY	273-1	8/8/2022	\$11,692.00
114	SHEFFIELD, STEPHEN	2405243		\$48,000.00
115	SHERFEY, BRADFORD	2405217		\$6,000.00
116	SIGURDSON, VINCENT	2405263		\$3,000.00
117	SIMMONS, DANIEL	2405269		\$31,006.00
118	SIMPSON, GARY	2405247		\$3,000.00
119	SIPES, BRETT	2405286		\$4,500.00
120	SIPES, MONA	2405248		\$6,000.00
121	SMITH, EMANUEL	2405276		\$3,000.00
122	SMITH, JERRY	2405306		\$6,000.00
123	SOMMER, DAVID [SOMMER, DAVID EDWARD]	937-1	11/16/2022	\$9,139.00
124	SPRAGUE, BASIL	2405346		\$48,000.00
125	STETSON, MARK	166-1	6/22/2022	\$4,272.00
126	STOCKDALE, ROGER	2405372		\$3,000.00
127	STONE, ROBERT	164-1	6/22/2022	\$7,000.00
128	THREADGILL, JOHN	2405467		\$1,500.00
129	TO, VINCENT	2405461		\$6,000.00
130	TORRES, JOE	2405470		\$6,000.00
131	TURNER, JACK	2405487		\$3,000.00
132	VAN LENNEP, JOHN	2405505		\$3,000.00
133	VANDESTEEG, JIM	2405514		\$6,000.00

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
134	VILLASIS, REGINALD	2405542		\$3,000.00
135	WAHLQUIST, JOHN	331-1	9/6/2022	\$6,000.00
136	WARD, DAVID (Lousiana)	2405592		\$500.00
137	WATTS, LENNY	2405634		\$22,006.00
138	WEBB, RANDALL R [WEBB, RANDY]	285-1	8/8/2022	\$15,545.00
139	WELBORN, FRANKLIN	2405655		\$6,000.00
140	WELLING, DAVID	2405650		\$35,000.00
141	WHITEHEAD, DANIEL	2405680		\$3,000.00
142	WINDER, DAN	2405725		\$2,503.00
143	WISE, STEVEN	633-1	10/24/2022	\$4,750.00
144	WOODS, BRUCE	2405729		\$2,500.00
145	YORK, JOHN	2405773		\$3,000.00

EXHIBIT 2

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

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

<p>In re: Front Sight Management LLC, Debtor.</p>	<p>Case No. 22-11824-abl Chapter 11 Hearing Date: March 12, 2024 Hearing Time: 1:30 p.m.</p>
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ORDER GRANTING LIQUIDATING TRUSTEE’S MOTION FOR AN ORDER IN AID OF IMPLEMENTATION OF CONFIRMED CHAPTER 11 PLAN OF REORGANIZATION DEEMING UNCLAIMED DISTRIBUTIONS TO CERTAIN HOLDERS OF ALLOWED CLAIMS TO BE FORFEITED TO THE LIQUIDATING TRUST PURSUANT TO 11 U.S.C. §§ 105(a) AND 1142 AND BANKRUPTCY RULE 3020(d)

1 On March 12, 2024, at 1:30 p.m., a hearing was held before the Honorable August Landis,
2 Chief United States Bankruptcy Judge for the District of Nevada, for the Court to consider the
3 *Motion of Liquidating Trustee for an Order in Aid of Implementation of Confirmed Chapter 11 Plan*
4 *of Reorganization Deeming Unclaimed Distributions to Certain Holders of Allowed Claims to Be*
5 *Forfeited to the Liquidating Trust Pursuant to 11 U.S.C. §§ 105(a) and 1142 and Bankruptcy Rule*
6 *3020(d)* [ECF No. ____] (the “Motion”)¹ filed by Province, LLC, solely in its capacity as the duly
7 authorized and acting Liquidating Trustee of the Trust. Appearances were as duly noted on the
8 record at the hearing.

9 The Court, having read and considered the Motion and all evidence filed in support of the
10 Motion; the Court having considered the argument and representations of counsel at the hearing and
11 other matters which the Court may properly take judicial notice, including, without limitation, the
12 record in this case as reflected on the docket; the Court having set forth its findings and conclusions
13 on the record pursuant to Rule 52 of the Federal Rules of Civil Procedure and Rule 7052 of the
14 Federal Rules of Bankruptcy Procedure; the Court having found that notice of the Motion was
15 sufficient under the circumstances and no other or further notice is required; no responses to the
16 Motion having been filed; the Court having determined that the legal and factual bases set forth in
17 the Motion establish just cause for the relief sought therein; and after due deliberation and sufficient
18 cause appearing therefor,

19 **IT IS HEREBY ORDERED THAT:**

- 20 1. The Motion is granted in its entirety.
- 21 2. Each of the Affected Claims listed in **Exhibit 1** attached to this Order is forfeited
22 except as expressly stated on the record. The Affected Claims shall not be entitled to any
23 Distributions (as defined in the Plan) from the Trust or the Debtor’s estate.
- 24 3. Any amount that would have otherwise been distributed to holders of the Affected
25 Claims remains property of the Trust.
- 26
- 27

28 ¹ All initial capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

1 4. Pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, made applicable in
2 contested matters through Bankruptcy Rules 7054 and 9014, this Order shall be treated as a final
3 judgment with respect to Affected Claims.

4 **IT IS SO ORDERED.**

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Prepared and Submitted By:

BG Law LLP

By: /s/ Susan K. Seflin
Susan K. Seflin
Jessica S. Wellington
Attorneys for Province, LLC, solely in its capacity as
the Liquidating Trustee of the Front Sight Creditors
Trust