

1 STEVEN T. GUBNER – NV Bar No. 4624  
 2 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*  
 3 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*  
 4 BG LAW LLP  
 5 300 S. 4<sup>th</sup> Street, Suite 1550  
 6 Las Vegas, NV 89101  
 7 Telephone: (702) 835-0800  
 8 Facsimile: (866) 995-0215  
 9 Email: sgubner@bg.law  
 10 sseflin@bg.law  
 11 jwellington@bg.law

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**

16 In re:  
 17 Front Sight Management LLC,  
 18  
 19 Debtor.

20 Case No. 22-11824-abl

21 Chapter 11

22 **Hearing Date:** July 16, 2024

23 **Hearing Time:** 1:30 p.m.

24 **DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF LIQUIDATING**  
 25 **TRUSTEE’S MOTION FOR ENTRY OF FINAL DECREE CLOSING THE DEBTOR’S**  
 26 **BANKRUPTCY CASE PURSUANT TO 11 U.S.C. § 350, RULE 3022 OF THE FEDERAL**  
 27 **RULES OF BANKRUPTCY PROCEDURE AND LOCAL BANKRUPTCY RULE 3022**

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

1. I am a principal of Province, LLC, the duly appointed liquidating trustee (“Liquidating Trustee”) for the Front Sight Creditors Trust (the “Trust”), and I am the individual charged with acting on the Liquidating Trustee’s behalf.

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 submit this declaration in support of the Liquidating Trustee’s *Motion For Entry Of*  
7 *Final Decree Closing The Debtor’s Bankruptcy Case Pursuant To 11 U.S.C. § 350, Rule 3022 Of*  
8 *The Federal Rules Of Bankruptcy Procedure And Local Bankruptcy Rule 3022* (the “Motion”) filed  
9 concurrently herewith. If called upon to testify, I could and would testify competently to the facts set  
10 forth in this Declaration and the Motion. I am authorized to submit this Declaration on the  
11 Liquidating Trustee’s behalf. Any capitalized term not defined in this Declaration has the same  
12 meaning ascribed to it in the Motion.

13           4.       On October 3, 2022, the Debtor filed its *Second Amended Chapter 11 Plan of*  
14 *Reorganization* [ECF No. 405] (together with any and all amendments thereto, all exhibits and  
15 schedules thereto and all documents incorporated by reference therein including all supplements, the  
16 “Plan”). On November 29, 2022, the Court entered its *Findings of Fact, Conclusions of Law, and*  
17 *Order Confirming the Debtor’s Second Amended Chapter 11 Plan of Reorganization* [ECF No. 556]  
18 (the “Confirmation Order”).

19           5.       Pursuant to the Plan, there were four classes of secured claims (Classes 1-4), one  
20 class of priority claims (Class 5) and one class of general unsecured claims (Class 6). Plan, pgs. 21-  
21 25.

22           6.       To the best of my knowledge, all of the Debtor’s professionals and all of the  
23 Committee’s professionals filed their final fee applications after the Effective Date, and all amounts  
24 owed under the professionals’ respective fee orders have been paid in full.

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

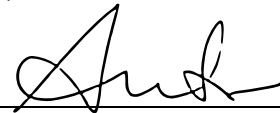
1 8. In April, the Liquidating Trustee made distributions to all holders of allowed general  
2 unsecured claims (Class 6) on a pro rata basis of 23% (which was higher than the Plan estimate of 10  
3 to 20%).

4 9. It is my understanding that counsel for the Liquidating Trustee has confirmed with  
5 counsel for the Reorganized Debtor that the Reorganized Debtor has paid all allowed secured and  
6 priority claims under the Plan (Classes 1, 2, 3, 4 and 5). The Liquidating Trustee was only  
7 responsible for distributions to holders of allowed general unsecured claims (Class 6) under the  
8 Confirmation Order and Liquidating Trust Agreement.

9 10. To the best of my knowledge, the Liquidating Trustee and the Reorganized Debtor  
10 have paid all fees (the "Trustee Fees") due to the UST under Section 1930 of Title 28 of the United  
11 States Code that they have been billed for. It is possible that there are additional fees owed, which  
12 will be paid by the Liquidating Trustee and/or the Reorganized Debtor as necessary prior to the  
13 hearing on the Motion.

14 11. At this point in time, the provisions of the Plan have been substantially consummated  
15 and the only outstanding tasks relate to the winding down of the Trust (which necessarily have to  
16 take place after the final decree has been entered closing the Debtor's bankruptcy case). All  
17 distributions pursuant to the Plan have been made, and all outstanding litigation has been fully  
18 resolved. There are no pending or open matters or proceedings and all final motions for approval of  
19 compensation and reimbursement of expenses incurred by professionals employed in the Debtor's  
20 cases have been filed and approved by the Court. In sum, the Debtor's bankruptcy estate has been  
21 fully administered, and the Debtor's bankruptcy case should be closed.

22 Executed on this 17<sup>th</sup> day of June, 2024 in Los Angeles, California.

23 

24 Amanda Demby Swift  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On June 17, 2024, I served the following document:

**DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF LIQUIDATING TRUSTEE’S MOTION FOR ENTRY OF FINAL DECREE CLOSING THE DEBTOR’S BANKRUPTCY CASE PURSUANT TO 11 U.S.C. § 350, RULE 3022 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND LOCAL BANKRUPTCY RULE 3022**

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

**(1) The Court’s CM/ECF List:**

- JASON BLUMBERG Jason.blumberg@usdoj.gov
- CANDACE C CARLYON ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com;nrodriguez@carlyoncica.com;9232006420@filings.docketbird.com;Dcica@carlyoncica.com
- CHAPTER 11 - LV USTPRegion17.lv.ecf@usdoj.gov
- DAWN M. CICA dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- THOMAS H. FELL tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- PHILIP S. GERSON Philip@gersonnvlaw.com
- STEVEN T GUBNER sgubner@bg.law, ecf@bg.law
- RAMIR M. HERNANDEZ rhernandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfilings@wrightlegal.net
- MICHAEL R. HOGUE hoguem@gtlaw.com, LVLitDock@GTLAW.com;flintza@gtlaw.com;andersonel@gtlaw.com;navarrom@gtlaw.com
- JASON B KOMORSKY jkomorsky@bg.law
- BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- BRYAN A. LINDSEY blindsey@nvfirm.com
- NICOLE E. LOVELOCK nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- EDWARD M. MCDONALD edward.m.mcdonald@usdoj.gov
- DAVID MINCIN dmincin@mincinlaw.com, cburke@mincinlaw.com
- TRACY M. O’STEEN tosteen@joneslovelock.com, jlinton@joneslovelock.com;lrillera@joneslovelock.com;ljanuskevicius@joneslovelock.com
- TERESA M. PILATOWICZ tpilatowicz@gtg.legal, bknotices@gtg.legal
- SAMUEL A. SCHWARTZ saschwartz@nvfirm.com, ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com
- SUSAN K. SEFLIN sseflin@bg.law
- BRIAN D. SHAPIRO brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- STRETTO ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov
- JESSICA S. WELLINGTON jwellington@bg.law, ecf@bg.law

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed June 17, 2024, at Woodland Hills, California.

/s/ Jennifer Warner  
JENNIFER WARNER