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

11 In re  
 12 Front Sight Management LLC,

Case No. 22-11824-abl

Chapter 11

**Date:** OST REQUESTED  
**Time:** OST REQUESTED

13 **DEBTOR’S EMERGENCY MOTION FOR ORDER PURSUANT TO 11 U.S.C. §§**  
 14 **102, 105, AND 502(b)(9), BANKRUPTCY RULES 2002, 3003(c)(3), 9007, AND 9036,**  
 15 **AND LOCAL RULES 1007, AND 3003: (I) AUTHORIZING THE**  
 16 **ESTABLISHMENT OF CERTAIN NOTICE PROCEDURES; (II) ESTABLISHING**  
 17 **BAR DATES AND PROCEDURES FOR FILING PROOFS OF CLAIM; AND (III)**  
 18 **AUTHORIZING THE DEBTOR TO KEEP ITS MEMBER LIST CONFIDENTIAL**

19 Front Sight Management LLC dba Front Sight Firearms Training Institute, the chapter 11  
 20 debtor and debtor in possession herein (the “Debtor”) hereby files its emergency motion (the  
 21 “Motion”) pursuant to Sections<sup>1</sup> 102, 205 and 502(b)(9), Bankruptcy Rules 2002, 3003(c)(3), 9007  
 22 and 9036, and Local Rules 1007 and 3003, requesting entry of an order (i) authorizing and approving  
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24  
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 26  
 27 <sup>1</sup> Unless otherwise stated, all references to “Chapters” and “Sections” herein shall be to the  
 28 Bankruptcy Code appearing in title 11 of the U.S. Code; all references to a “Bankruptcy Rule” shall  
 refer to the Federal Rules of Bankruptcy Procedure; and all references to a “Local Rule” shall refer  
 to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

1 the Notice Procedures (defined below); (ii) establishing bar dates for filing proofs of claim and  
2 procedures for filing proofs of claim and approving the form of notice (the “Bar Date Notice”); and  
3 (iii) authorizing and approving the Debtor to keep its member list confidential.

4 The Motion is made on the grounds that there are approximately 263,000 parties in interest in  
5 this case, of which the Debtor believes that approximately 80,000 may be creditors, and it is in the  
6 best interest of the bankruptcy estate and its creditors to limit the expenses necessarily incurred by  
7 the estate when providing notice of matters occurring in the course of the administration of this case.

8 This Motion is based on this Motion and annexed Memorandum of Points and Authorities,  
9 the concurrently filed *Omnibus Declaration of Ignatius Piazza in Support of First Day Motions* (the  
10 “Piazza Decl.”) and evidence appended thereto, the arguments of counsel and other admissible  
11 evidence properly brought before the Court at or before the hearing on this Motion.

12 **WHEREFORE**, the Debtor respectfully requests that this Court enter an order granting the  
13 Motion in its entirety and granting the relief requested herein, in substantially the form attached  
14 hereto as **Exhibit 1**, and to grant such other relief as the Court deems appropriate under the  
15 circumstances.

16 DATED: May 24, 2022

BG LAW LLP

17  
18 By: /s/ Susan K. Seflin  
19 Steven T. Gubner  
20 Susan K. Seflin  
21 Jessica Wellington  
22 Proposed Attorneys for Chapter 11  
23 Debtor and Debtor in Possession  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to Rule 9014.2(a) of the Local Rules of Bankruptcy Practice of the United States District Court for the District of Nevada (the “Local Rules”), the Debtor confirms its consent to the entry of a final order by the Bankruptcy Court in connection with this Motion to the extent that it is later determined that the Bankruptcy Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. The statutory predicates for the relief requested in this Motion are Sections 102, 205 and 502(b)(9), Bankruptcy Rules 2002, 3003(c)(3), 9007 and 9036, and Local Rules 1007 and 3003.

**II. FACTUAL BACKGROUND**

**A. General Case Background**

1. On May 24, 2022, Front Sight Management LLC dba Front Sight Firearms Training Institute, a Nevada limited liability company, filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtor continues to operate its business and manage its affairs as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or committee has been appointed in the Debtor’s chapter 11 case.

**B. Description of the Debtor’s Business**

2. The Debtor was founded in 1996 by Ignatius Piazza. Mr. Piazza owns, either directly or indirectly, 100% of the Debtor. The Debtor was originally formed as a California business and operated near Bakersfield, California from its formation in 1996 until 2002. In 1998, the Debtor purchased 550 acres of raw land 45 minutes from Las Vegas, acquired approximately 500 acre feet of water rights and began building what is now the finest and largest private firearms training facility in the world (the “Front Sight Property”).

1           3.       In 2012, the Debtor became a Nevada limited liability company. The Debtor’s  
2 primary place of business is the Front Sight Property located at 1 Front Sight Road, Pahrump,  
3 Nevada 89061.

4           4.       The Front Sight Property is accessed by a four-mile, two lane paved road, and is  
5 currently comprised of 50 outdoor firearms training ranges, live fire tactical training simulators, an  
6 8,000 square foot classroom and pro shop, and assorted accessory buildings, bathrooms, three water  
7 wells and thousands of square yards of completed grading for future development.

8           5.       The Debtor provides firearms training courses which promote the defensive use of  
9 various firearms. Courses are offered to the general public, members of law enforcement and  
10 military members.

11           6.       The Front Sight Firearms Facility is the most successful of its type in the United  
12 States. The Debtor provides classes and instruction annually to upward of 40,000 gun and weapons  
13 enthusiasts. The Debtor is considered the leader in its field, and provides additional training and  
14 instruction for numerous city and state agencies seeking to improve performance of their respective  
15 law enforcement departments.

16           7.       Over the last 25 years, the Debtor has trained a million students and currently has  
17 over 263,000 members, of which approximately 80,000 are active.

18           8.       As of January 19, 2022, the Front Sight Property (including the land, water rights and  
19 improvements but excluding equipment and inventory) was appraised at \$25,260,000 “as is.”

20           9.       Historically, the Debtor has operated its business by selling lifetime memberships at  
21 an amount ranging from \$250 to \$50,000, courses and ancillary products. The Debtor’s business  
22 model centered around a major expansion plan that was intended to build the Front Sight Vacation  
23 Club & Resort (vacation residences, a RV park, etc.), a retail area adjacent to the vacation club and a  
24 pavilion. The Debtor’s intent was that the discounted lifetime memberships and other promotional  
25 benefits (like “Front Sight bucks” [money to be used on limited items at Front Sight], certificates [to  
26 be used for 2 day or 4 day training courses], etc.) would lead to a “captive” customer base that would  
27 be more likely to take advantage of the Vacation Club & Resort which would then bring increased  
28 revenue to the Debtor.

1 10. More detailed information about the Debtor's history and the reason for its  
2 bankruptcy filing are set forth in the Piazza Decl. filed concurrently herewith.

3 **C. Parties In Interest in this Case**

4 11. As stated above, the Debtor's business includes selling lifetime memberships for use  
5 of the Debtor's facilities and training courses. The Debtor has approximately 263,000 members.  
6 The Debtor believes that its members are parties in interest in this case, and therefore, should be  
7 provided certain notices regarding the proceedings in this case. Of the 263,000 members, the Debtor  
8 believes that approximately 80,000 members are also creditors of the Debtor. Approximately  
9 183,000 of the Debtor's members are inactive and have not spent any money with the Debtor in at  
10 least ten (10) years.

11 12. Historically, the Debtor has regularly communicated via email with all of its members  
12 and in most instances, the sole form of communication is via email. The Debtor is confident that the  
13 majority of the email addresses that it has for its members are correct. On the other hand, the  
14 Debtor's records with respect to mailing addresses are incomplete and because the Debtor rarely  
15 communicates with members by mail, the Debtor believes that many of the mailing addresses that it  
16 does have are out of date and incorrect. The Debtor believes the best way to communicate  
17 effectively with its members is via email.

18 13. Service of all pleadings via mail to all parties for the entire case is cost prohibitive to  
19 because each mailing is estimated to cost over \$260,000, and would easily result in expenses relating  
20 to mailing services exceeding \$1,000,000 (which funds the Debtor does not have).

21 14. In addition, at least 20% of the Debtor's members are current or former law  
22 enforcement, and at least 10% are current or former military. Various state laws prohibit public  
23 disclosure of a law enforcement official's personal information, including but not limited to name,  
24 address, telephone number and email address. *See e.g.*, Cal. Gov. Code §§ 6254.21 and 6254.24;  
25 Colo. Rev. Stat. Ann. § 18-9-313; Idaho Code Ann. § 19-5802; Tex. Gov't Code Ann. § 552.117;  
26 Fla. Stat. Ann. § 119.071; Nev. Rev. Stat. Ann. § 289.025; Utah Code Ann. § 63G-2-303; N.J. Stat.  
27 Ann. § 2C:20-31.1. Moreover, many state laws also prohibit public disclosure of the official's  
28 family members' personal information or of anyone living at the same address as the official. *See id.*

1 Some of the state laws include penalties for violations. As but one example, in California, if the  
2 Debtor violates Cal. Gov. Code §§ 6254.21 and 6254.24, the Debtor could be liable for a \$1,000  
3 penalty per incident, a minimum payment to the officer of \$4,000 for damages, and if the Debtor is  
4 found to be at fault, the Debtor could be required to pay all court and attorney's fees for the officer.

5 15. Lastly, the Debtor's membership list is proprietary and has significant value. Publicly  
6 disclosing this information would significantly decrease the value of the Debtor's membership list  
7 and likely make it worthless.

### 8 **III. RELIEF REQUESTED**

9 16. By this Motion, Debtor requests an order substantially in the form of the proposed  
10 order, attached hereto as **Exhibit 1**, (i) authorizing and approving the Procedures for Providing  
11 Notices in the Chapter 11 Case (the "Notice Procedures"); (ii) establishing bar dates for filing proofs  
12 of claim and procedures for filing proofs of claim and approving the Bar Date Notice; and (iii)  
13 authorizing the Debtor to keep its member list confidential (including members who are also  
14 creditors).

15 17. The Debtor submits that the relief sought in the Motion (a) is a means of limiting the  
16 cost of noticing in this chapter 11 case while simultaneously ensuring that all interested parties are  
17 afforded due process and are not prejudiced, and (b) ensures that the value of the Debtor's  
18 membership list is not greatly decreased by making it public.

19 18. At least 20% of the Debtor's members are current or former law enforcement and at  
20 least 10% are current or former military, and it would be extremely difficult for the Debtor to ensure  
21 that it correctly identifies all such members and their family members who are members. Should the  
22 Debtor not be able to correctly identify such members, the Debtor risks significant liability for  
23 publicly disclosing such information. Accordingly, the Debtor requests to keep its member list  
24 confidential to ensure that it complies with the various state laws prohibiting public disclosure of law  
25 enforcement's personal information and that of their family members. The Debtor proposes that  
26 Stretto, its proposed noticing and claims agent, be responsible for maintaining the Debtor's creditor  
27 matrix in order to keep such information confidential and that it not be required to publicly file such  
28 matrix.

1 19. As such, Debtor submits that the relief requested herein is in the best interest of  
2 Debtor, its estate, creditors and other parties in interest and, therefore, should be granted.

#### 3 **IV. BASIS FOR RELIEF REQUESTED**

##### 4 **A. The Notice Procedures are Appropriate Under the Bankruptcy and Local Rules**

5 The Bankruptcy Code, Bankruptcy Rules, and Local Rules provide the Court with authority  
6 to approve notice procedures and flexibility in the type of procedures that may be approved. The  
7 significant cost savings the Notice Procedures will provide to Debtor's estate, while avoiding  
8 prejudice to any party, is good cause for approval of the Notice Procedures.

9 Bankruptcy Rule 2002(m) states that "[t]he court may from time to time enter orders  
10 designating the matters in respect to which, the entity to whom, and the form and manner in which  
11 notices shall be sent except as otherwise provided by these rules." Fed. R. Bankr. P. 2002(m). *See*  
12 *also* Fed. R. Bankr. P. 9007 ("When notice is to be given under these rules, the court shall designate,  
13 if not otherwise specified herein, the time within which, the entities to whom, and the form and  
14 manner in which the notice shall be given."). Section 102(1) provides that, where the Bankruptcy  
15 Code provides for an action to occur "after notice and a hearing," such action may occur "after such  
16 notice as is appropriate in the particular circumstances, and such opportunity for a hearing as is  
17 appropriate in the particular circumstances . . . ." 11 U.S.C. § 102(1)(A). Finally, Section 105(a)  
18 permits the Court to enter any order "appropriate to carry out the provisions" of the Bankruptcy  
19 Code. *See* 11 U.S.C. § 105(a).

20 Electronic noticing has become commonplace in bankruptcy proceedings, being specifically  
21 authorized by the Bankruptcy Rules and generally mandatory under the Local Rules and the local  
22 rules of other bankruptcy courts. Bankruptcy Rule 9036 authorizes parties in interest to request that  
23 "all or part of the information required to be contained in the notice be sent by a specified type of  
24 electronic transmission[.]" Fed. R. Bankr. P. 9036.

25 Furthermore, pursuant to Local Rule 5005, most filers are required to register to file  
26 electronically. *See* Local Rule 5005(a)(2). Registration for electronic filing entails a waiver of the  
27 right to receive notice by first class mail of any matters in a bankruptcy case, and service by  
28 electronic means is specifically authorized. *See id.* at 5005(e), (c). Thus, electronic noticing has

1 been broadly embraced. As stated in 2005 in the Advisory Committee Notes to Bankruptcy Rule  
2 9036, “[c]onfidence in the delivery of email text messages now rivals or exceeds confidence in the  
3 delivery of printed materials.” In addition to being at least as reliable as it was in 2005, use of email  
4 has become more widespread in the past fifteen years. It is instant, reliable, inexpensive, and highly  
5 accessible.

6 The Notice Procedures extend the authorizations for electronic noticing and service set forth  
7 in the Local Rules to all parties in interest except those that certify that they do not have email  
8 access. If a party does not have access to e-mail, then such party will be served by first class mail,  
9 overnight delivery, facsimile, or hand delivery. Therefore, no party will be affected adversely by the  
10 proposed electronic service called for in the Notice Procedures.

11 The Notice Procedures also limit notice to active participants in the chapter 11 case and  
12 other directly-affected parties where a mass mailing would reach parties who have no direct interest  
13 in the subject of the notice and entail great cost to the Debtor’s estate without any corresponding  
14 benefit. They also limit notice to persons or entities unknown to the Debtor or who cannot  
15 reasonably be located by the Debtor. Locating such persons or entities and serving notice *via* first-  
16 class mail would impose administrative costs on the estates so exorbitant that any recovery to  
17 unsecured creditors would be severely threatened. The Debtor submits that such a limitation is  
18 appropriate under the Bankruptcy Code and Bankruptcy Rules and is also contemplated by the  
19 authorization in Local Rule 1007, which permits a debtor to prepare and file a special notice list  
20 limited to certain enumerated parties.

21 While the Debtor proposes to limit its direct noticing under certain circumstances, it  
22 proposes to exceed the requirements of the Bankruptcy Code, Bankruptcy Rules, and Local Rules in  
23 making information about this chapter 11 case easily accessible to the public. Therefore, the Notice  
24 Procedures fall well within the Court’s authority to regulate notices and will substantially reduce the  
25 administrative and economic burdens that would otherwise be imposed upon the Bankruptcy Court,  
26 the clerk of the Bankruptcy Court and the Debtor’s estate, without diminishing a creditor or party in  
27 interest’s, opportunity to receive notice, if they so desire.

28



1 Accordingly, the Debtor submits that the relief requested herein is in its best interests and  
2 those of its estate, creditors, and other parties in interest and will foster the efficient and economic  
3 administration of this case. In light of the foregoing, the Debtor's request that the Court limit notice  
4 in this chapter 11 case should be approved.

5 **B. The Bar Dates, Proof of Claim Procedures and Proof of Claim Form Should be**  
6 **Approved**

7 **1. The Bar Dates**

8 Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which proofs  
9 of claim may be filed in chapter 11 case. Further, Bankruptcy Rule 3003(c)(2) provides that any  
10 creditor whose claim is (i) not scheduled in a debtor's schedules or (ii) is scheduled as disputed,  
11 contingent, or unliquidated, must file a proof of claim within the time established by the Court.  
12 Bankruptcy Rule 3003(c)(2) further provides that "any creditor who fails to do so shall not be treated  
13 as a creditor with respect to such claims for the purposes of voting and distribution."

14 In an effort to minimize administrative costs for the benefit of its estate and all parties in  
15 interest (and pursuant to the terms of its debtor-in-possession financing), the Debtor intends to act as  
16 expeditiously as possible in the chapter 11 case. In order to do so, the Debtor requires information  
17 concerning the universe of potential claims, which will inform its consideration of, among other  
18 things, the anticipated recoveries to creditors, the formulation of its plan and the contents of its  
19 disclosure statement(s), and will otherwise be necessary for the Debtor's resolution of this chapter  
20 11 case. **Therefore, the Debtor proposes that any person, including, without limitation,**  
21 **individuals, partnerships, corporations, joint ventures, and trusts, but not including**  
22 **Governmental Units, asserting a prepetition claim (as defined in 11 U.S.C. § 101(5)) against the**  
23 **Debtor shall file a Proof of Claim in the chapter 11 case so that it is received by the Notice**  
24 **Agent on or before July 15, 2022 (the "General Bar Date"). Any Governmental Unit asserting**  
25 **a prepetition claim (as defined in 11 U.S.C. § 101(5)) against the Debtor shall file a Proof of**  
26 **Claim so that it is received by the Notice Agent on or before November 21, 2022 (the**  
27 **"Governmental Bar Date").**  
28

1 Moreover, to the extent the holders of disputed and unliquidated potential litigation claims  
2 file proofs of claim, the Debtor anticipates that it would seek to estimate these claims under Section  
3 502(c), including for plan confirmation purposes. To afford the Debtor the realistic opportunity to  
4 evaluate claims and pursue an estimation process if needed, the Debtor requires that the Court  
5 shorten the deadline to file Proofs of Claim.

6 **2. The Bar Date Notice Satisfies Bankruptcy Rule 2002(a)(7) and is**  
7 **Adequate**

8 The Debtor further requests that the Court approve the Bar Date Notice and direct that the  
9 Bar Date Notice supersede the bar dates contained in any *Notice of Chapter 11 Bankruptcy Case* in  
10 the Debtor's chapter 11 case that may be issued prior to entry of the order on this Motion. Pursuant  
11 to Bankruptcy Rules 2002(a)(7), (f) and (m), the Debtor proposes to provide the Bar Date Notice and  
12 the Proof of Claim Form no later than three (3) business days following entry of an order granting  
13 the relief requested herein. The Claims Agent shall also post the Proof of Claim Form and the Bar  
14 Date Notice on the Case Website established for the Debtor's chapter 11 case.

15 The proposed form of and manner of serving the Bar Date Notice and the Proof of Claim  
16 Form satisfy Bankruptcy Rule 2002. Bankruptcy Rule 2002(a)(7) requires the Debtor to provide at  
17 least 21 days' notice of time fixed for filing Proofs of Claim. The Debtor will be providing  
18 approximately 45 days' notice of the deadline to file Proofs of Claim to all creditors. Accordingly,  
19 the Debtor submits that the proposed General Bar Date and Procedures provide sufficient time for all  
20 parties in interest to assert their claims.

21 Further, because the proposed Bar Date Notice will provide notice of the Bar Date and other  
22 deadlines to all known creditors by mail or email to the extent that the mailing address of the creditor  
23 is unknown to the Debtor, the Debtor submits that the Bar Date Notice is reasonably calculated,  
24 under all the circumstances, to apprise interested parties, including persons who may hold claims  
25 against the Debtor, of the pendency of the chapter 11 case and afford them an opportunity to assert a  
26 claim or otherwise be heard in the case. Accordingly, the Debtor submits that no further or other  
27 notice of the Bar Dates is necessary.  
28

1                   **3. The Proposed Procedures for Filing Proofs of Claim**

2                   As to the claims scheduled by the Debtor, the Debtor proposes that the Notice Agent will  
3 prepare and send the customized Proof of Claim Forms to parties with scheduled claims listed on the  
4 Debtor’s Schedules D and E/F. The customized Proof of Claim Form will include reference to the  
5 amount and nature of the scheduled claim, along with instructions for filing a claim if the claimant  
6 disagrees with their scheduled claim. The Notice Agent will maintain a secure, online portal for  
7 scheduled creditors to access details of their scheduled claim. The Notice Agent will utilize name,  
8 address and email information provided by the Debtor to validate requests for claims information.  
9 **Creditors will receive their scheduled claim details via email**, along with links to the Notice of  
10 Claims Bar Date and relevant information contained therein. **Members who are not creditors will**  
11 **receive** a link to the Notice of Claims Bar Date. This will result in significantly more parties in  
12 interest receiving the Notice of Claims Bar Date.

13                   The Debtor proposes the following procedures (the “Claims Procedures”) for filing Proofs of  
14 Claims:

- 15                   I. Proofs of Claim must:
- 16                   a. be written in the English language;
  - 17                   b. be denominated in lawful currency of the United States;
  - 18                   c. be on the form annexed to the Proposed Order as **Exhibit B** or otherwise  
19 conform substantially to the Official Bankruptcy Form B 410 (“Official  
20 Form B 410”);
  - 21                   d. set forth with specificity the legal and factual bases for the alleged claim;
  - 22                   e. include supporting documentation; and
  - 23                   f. be signed by the claimant or, if the claimant is not an individual, by an  
24 authorized agent of the claimant;
- 25                   II. Proofs of Claim will be deemed timely filed only if the Proofs of Claim are  
26 actually received by the Notice Agent by the applicable Bar Date at:  
27 If sent by first class mail, hand delivery or overnight:  
28

1 Front Sight Claims Processing

2 c/o Stretto

3 410 Exchange, Suite 100

4 Irvine, CA 92602

5 If by electronic transmission:

6 [www.cases.stretto.com/frontsight](http://www.cases.stretto.com/frontsight)

7 III. Proofs of Claim sent by facsimile or electronic mail transmission will not be  
8 accepted; and

9 IV. any person or entity that relies on the Schedules has the responsibility to  
10 determine that its claim is accurately listed in the Schedules.

11 Moreover, the Debtor proposes that the following persons or entities not be required to file  
12 Proofs of Claim in this case:

- 13 I. any person or entity that has already properly filed a Proof of Claim against the  
14 Debtor on or before the General Bar Date with the Clerk of the Court for the  
15 United States Bankruptcy Court for the District of Nevada in a form substantially  
16 similar to Official Bankruptcy Form B 410;
- 17 II. any person or entity:
- 18 a. whose claim is listed in the Schedules or any amendments thereto;
  - 19 b. whose claim is not described in the Schedules as “disputed,” “contingent,”  
20 or “unliquidated”; and
  - 21 c. who does not dispute the amount or characterization of its claim  
22 (including on grounds that the claim is an obligation of the Debtor against  
23 which the claim is listed in the Schedules) in the Schedules;
- 24 III. any professionals retained by the Debtor pursuant to orders of this Court who  
25 assert administrative expense claims for fees and expenses subject to the Court’s  
26 approval pursuant to Sections 330, 331, and 503(b);
- 27 IV. any person or entity that asserts an administrative expense claim against the  
28 Debtor pursuant to Section 503(b);

- 1 V. any person or entity whose claim against the Debtor has been allowed by an order  
2 of the Court entered on or before the General Bar Date;
- 3 VI. any person or entity whose claim against the Debtor has been paid in full by the  
4 Debtor pursuant to an order of the Court entered on or before the General Bar  
5 Date; and
- 6 VII. any entity holding an interest in the Debtor whose interest is based solely upon the  
7 ownership of common or preferred stock in a corporation, a membership interest  
8 in a limited liability company, warrants or rights to purchase, sell or subscribe to  
9 such a security or interest, need not file a proof of interest on or before the  
10 General Bar Date; *provided, however*, that interest holders that wish to assert  
11 claims against the Debtor that arise out of or relate to the ownership or purchase  
12 of an interest, including claims arising out of or relating to the purchase, sale,  
13 issuance, or distribution of an interest, must file Proofs of Claim on or before the  
14 General Bar Date, unless another of the exceptions enumerated above applies.

15 Consequences of Failure to File a Proof of Claim. In accordance with Bankruptcy Rule  
16 3003(c)(2), the Debtor proposes that any creditor with a claim not scheduled or scheduled as  
17 disputed, contingent, or unliquidated who fails to timely or properly file a Proof of Claim by the  
18 applicable Bar Date shall (i) not be treated as a creditor with respect to such claims for the purposes  
19 of voting and distributions in the chapter 11 case on account of such claims, and (ii) not receive or be  
20 entitled to receive any payment or distribution of property from the Debtor or its successors or  
21 assigns with respect to such claims.

#### 22 **4. The Proof of Claim Form**

23 The Debtor seeks approval of the Proof of Claim Form annexed to the Proposed Order as  
24 **Exhibit B.** The Proof of Claim Form is substantially in the form of Official Form 410 but has been  
25 modified in certain limited respects to accommodate the claims process in this chapter 11 case. The  
26 modification of Official Form 410 adds the name the Debtor in this chapter 11 case. The Debtor  
27 hereby requests that the Court approve the Proof of Claim Procedures, the Proof of Claim Form, and  
28 the limited modifications to Official Form 410 contained therein.

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**5. Objections to Claims and Reservations of Rights**

The Debtor reserves all rights and defenses with respect to any Proof of Claim, including, among other things, the right to object to any Proof of Claim on any ground. The Debtor also reserves all rights and defenses to any claim listed on the Schedules, including, among other things, the right to dispute any such claim and assert any offsets or defenses thereto. To the extent Debtor disputes any claim listed on the Schedules and such claim is not already listed as disputed, contingent, or unliquidated, the Debtor shall amend the Schedules as appropriate.

**V. CONCLUSION**

Based on the foregoing, the Debtor respectfully requests that the Bankruptcy Court enter an order granting the relief requested herein, in substantially the form attached hereto as **Exhibit 1**, and to grant such other relief as the Bankruptcy Court deems appropriate under the circumstances.

DATED: May 24, 2022

BG LAW LLP

By: /s/ Susan K. Seflin  
Steven T. Gubner  
Susan K. Seflin  
Jessica Wellington  
Proposed Attorneys for Chapter 11  
Debtor and Debtor in Possession

EXHIBIT “1”

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and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re  
Front Sight Management LLC,

Case No. 22-11824-abl

Chapter 11

**Date:**  
**Time:**

**ORDER GRANTING DEBTOR’S EMERGENCY MOTION FOR ORDER PURSUANT TO  
11 U.S.C. §§ 102, 105, AND 502(b)(9), BANKRUPTCY RULES 2002, 3003(c)(3), 9007, AND  
9036, AND LOCAL RULES 1007, AND 3003: (I) AUTHORIZING THE ESTABLISHMENT  
OF CERTAIN NOTICE PROCEDURES; (II) ESTABLISHING BAR DATES AND  
PROCEDURES FOR FILING PROOFS OF CLAIM; AND (III) AUTHORIZING THE  
DEBTOR TO KEEP ITS MEMBER LIST CONFIDENTIAL**



1 This matter having come before the Court upon the Motion<sup>1</sup> of the above-captioned debtor  
 2 and debtor-in-possession (the “Debtor”) pursuant to Sections<sup>2</sup> 102, 205 and 502(b)(9),  
 3 Bankruptcy Rules 2002, 3003(c)(3), 9007 and 9036, and Local Rules 1007 and 3003, for entry of an  
 4 order (this “Order”) authorizing and approving the Notice Procedures; (ii) establishing bar dates for  
 5 filing proofs of claim and procedures for filing proofs of claim and approving the Bar Date Notice;  
 6 and (iii) authorizing and approving the Debtor to keep its member list confidential, all as more fully  
 7 set forth in the Motion and upon the Piazza Declaration; and this Court having jurisdiction over this  
 8 matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that venue of this  
 9 proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this  
 10 Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court  
 11 having found that the Debtor’s notice of the Motion and opportunity for a hearing on the Motion  
 12 were appropriate under the circumstances and no other notice need be provided; and this Court  
 13 having reviewed the Motion and having heard the statements in support of the relief requested  
 14 therein at a hearing, if any, before this Court (the “Hearing”); appearances having been noted on the  
 15 record at the Hearing; the Court having stated its findings of fact and conclusions of law on the  
 16 record at the hearing on the Motion, which findings of fact and conclusions of law are incorporated  
 17 herein by this reference in accordance with Fed. R. Civ. P. 52, as made applicable by Bankruptcy  
 18 Rule 9014; and this Court having determined that the legal and factual bases set forth in the Motion  
 19 and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings  
 20 had before this Court; and after due deliberation and sufficient cause appearing:

21 **IT IS HEREBY ORDERED THAT:**

- 22 1. The Motion is GRANTED.
- 23 2. The Notice Procedures, substantially in the form attached hereto as **Exhibit A**, are  
 24 approved and shall govern the chapter 11 case, except as otherwise ordered by the Court.

25 \_\_\_\_\_  
 26 <sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to  
 them in the Motion.

27 <sup>2</sup> Unless otherwise stated, all references to “Chapters” and “Sections” herein shall be to the  
 28 Bankruptcy Code appearing in title 11 of the U.S. Code; all references to a “Bankruptcy Rule” shall  
 refer to the Federal Rules of Bankruptcy Procedure; and all references to a “Local Rule” shall refer  
 to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

1           3.       The Notice Procedures shall be served upon all parties on the Master Mailing List  
2           within three (3) business days after the later of (i) the Court’s entry of this Order, and (ii) the  
3           date on which the United States trustee fixes the date for the first meeting of creditors  
4           pursuant to Section 341(a).

5           4.       The Notice Agent is authorized to establish a case website at  
6           www.cases.stretto.com/frontsight where, among other things, key dates, documents and  
7           information about the Debtor’s chapter 11 case, including electronic copies of all papers filed  
8           in the chapter 11 case, will be posted and may be viewed by the public free of charge.

9           5.       Any person, including, without limitation, individuals, partnerships, corporations,  
10          joint ventures, and trusts, but not including Governmental Units, asserting a prepetition claim  
11          (as defined in 11 U.S.C. § 101(5)) against the Debtor shall file a Proof of Claim in the  
12          chapter 11 case so that it is received by the Notice Agent on or before **July 15, 2022** (the  
13          “General Bar Date”).

14          6.       Any Governmental Unit asserting a prepetition claim (as defined in 11 U.S.C. §  
15          101(5)) against the Debtor shall file a Proof of Claim so that it is received by the Notice  
16          Agent on or before **November 21, 2022** (the “Governmental Bar Date”).

17          7.       If the Debtor rejects an executory contract or an unexpired lease pursuant to Section  
18          365, the Proof of Claim on account of any alleged damages resulting from such rejection of  
19          such executory contract or unexpired lease shall be filed so that it is received by the Notice  
20          Agent on or before the *later* of (i) the General Bar Date, and (ii) the date that is thirty (30)  
21          days after the entry of any order of this Court authorizing the Debtor’s rejection of an  
22          executory contract or unexpired lease (the “Rejection Damages Bar Date”).

23          8.       If Debtor serves notice of an amendment or supplement to one or more of its  
24          Schedules to: (a) designate a claim as disputed, contingent, unliquidated or undetermined; (b)  
25          change the amount of a claim listed in the Schedules; (c) change the priority or secured status  
26          of a claim listed in the Schedules; or (d) add a claim that was not listed on the Schedules, any  
27          holder of a claim so designated, changed or added must file a Proof of Claim on or before the  
28          later of (i) the General Bar Date and (ii) thirty (30) days after the date such claim is

1 designated, changed or added (any such date, a “Supplemental Bar Date,” and together with  
2 the General Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, the  
3 “Bar Dates”).

4 9. Neither the Bar Dates nor any other deadline established in this Order applies to  
5 requests for the payment of administrative expenses arising in this case under 11 U.S.C. §§  
6 503, 507(a)(2), 507(b), 330(a), 331, and/or 364.

7 10. Proofs of Claim shall be sent to the Notice Agent via first class mail, hand delivery,  
8 or overnight courier. The Notice Agent shall not be required to accept Proofs of Claim sent  
9 *via* facsimile, telecopy or e-mail. Proofs of Claim shall be addressed as follows:

10 a. If sent by first class mail, hand delivery or overnight:

11 Front Sight Claims Processing  
12 c/o Stretto  
13 410 Exchange, Suite 100  
14 Irvine, CA 92602

15 b. If by electronic transmission:

16 [www.cases.stretto.com/frontsight](http://www.cases.stretto.com/frontsight)

17 11. Proofs of Claim mailed or delivered to the Notice Agent shall be deemed timely filed  
18 only if actually received by the Notice Agent on or before the applicable Bar Date at the  
19 address listed above.

20 12. The following persons or entities shall **not** be required to file Proofs of Claim:

21 a. Any person or entity who has already properly filed a Proof of Claim against the  
22 Debtor on or before the General Bar Date with the Clerk of the Bankruptcy Court for  
23 the United States Bankruptcy Court for the District of Nevada in a form substantially  
24 similar to Official Bankruptcy Form B410;

25 b. any person or entity (i) whose claim is listed in the Schedules or any amendments to  
26 the Schedules and is not described in the Schedules as “disputed,” “contingent,” or  
27 “unliquidated,” and (ii) who does not dispute the amount or characterization of its  
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1 claim in the Schedules (including on grounds that the claim is an obligation of the  
2 Debtor against whom the claim is listed in the Schedules);

- 3 c. any professionals retained by the Debtor pursuant to orders of this Bankruptcy Court  
4 who assert administrative claims for fees and expenses which are subject to the  
5 Court's approval pursuant to Sections 330, 331 and 503(b);
- 6 d. any person or entity that asserts an administrative expense claim against the Debtor  
7 pursuant to Section 503(b);
- 8 e. any person or entity whose claim against the Debtor has been allowed by an order of  
9 the Court entered on or before the General Bar Date;
- 10 f. any holder of a claim for whom specific deadlines have previously been fixed by the  
11 Court;
- 12 g. any person or entity whose claim against the Debtor has been paid in full pursuant to  
13 an order of the Court entered on or before the General Bar Date; and
- 14 h. any entity holding an interest in the Debtor whose interest is based solely upon the  
15 ownership of common or preferred stock in a corporation, a membership interest in a  
16 limited liability company, warrants or rights to purchase, sell or subscribe to such a  
17 security or interest, need not file a proof of interest on or before the General Bar Date;  
18 *provided, however*, that interest holders that wish to assert claims against the Debtor  
19 that arise out of or relate to the ownership or purchase of an interest, including claims  
20 arising out of or relating to the purchase, sale, issuance, or distribution of an interest,  
21 must file Proofs of Claim on or before the General Bar Date, unless another of the  
22 exceptions enumerated above applies.

23 13. Any person or entity who is required to file a Proof of Claim but fails to timely file a  
24 Proof of Claim in accordance with the Claims Procedures, shall (i) not be treated as a creditor  
25 with respect to any such claims for the purposes of voting and distribution, and (ii) not  
26 receive or be entitled to receive any payment or distribution of property from the Debtor or  
27 its successors or assigns with respect to such claim.  
28

1 14. The Proof of Claim Form, in substantially the form attached hereto as **Exhibit B**, the  
2 Commencement Notice, in substantially the form attached hereto as **Exhibit C**, and the Bar  
3 Date Notice, in substantially the form attached hereto as **Exhibit D**, are hereby approved in  
4 all respects.

5 15. The Commencement Notice relating to the chapter 11 case replaces and supersedes in  
6 its entirety any “Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors & Deadlines”  
7 entered in the chapter 11 case.

8 16. The Notice Procedures, Bar Date Notice, and the Commencement Notice shall be  
9 deemed good, adequate, and sufficient notice of the relief granted by this Order to all known  
10 creditors of the Debtor if it is served, together with a Proof of Claim form, by being  
11 deposited in first-class U.S. mail, postage prepaid (or in such other manner generally  
12 authorized for service) no later than three (3) business days following the later of (i) the entry  
13 of this Order; and (ii) the date on which the United States trustee fixes the date for the  
14 meeting of creditors pursuant to Section 341(a), upon all Notice Parties.

15 17. The Notice Procedures and the Claims Procedures approved are herein are reasonably  
16 calculated, under all the circumstances, to apprise interested parties, including persons who  
17 may hold claims against the Debtor, of the pendency of the chapter 11 case and afford them  
18 an opportunity to assert a claim or otherwise be heard in the chapter 11 case.

19 18. Nothing in this Order shall prejudice the right of the Debtor or any other party-in-  
20 interest to, among other things, object to any Proof of Claim on any grounds, dispute or  
21 assert offsets or defenses to any claim listed on the Schedules as to amount, liability,  
22 characterization or otherwise, and to subsequently designate any claim as disputed,  
23 contingent or unliquidated.

24 19. The Debtor is authorized to take all actions necessary to implement the relief granted  
25 in this Order.

26 20. This Bankruptcy Court shall retain jurisdiction to hear and determine all matters  
27 arising from or related to implementation of this Order.

28 **IT IS SO ORDERED.**

1 Submitted by:  
2 BG LAW LLP

3 By: \_\_\_\_\_  
4 Steven T. Gubner  
5 Susan K. Seflin  
6 Jessica Wellington

7 Proposed Attorneys for Chapter 11  
8 Debtor and Debtor in Possession  
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**LR 9021 CERTIFICATION**

In accordance with LR 9021, an attorney submitting this document certifies as follows

(check one):

The court has waived the requirement set forth in LR 9021(b)(1).

No party appeared at the hearing or filed an objection to the motion.

I have delivered a copy of this proposed order to all attorneys who appeared at the hearing and opposed the relief, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

I certify that this is a case under chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

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# EXHIBIT A



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

7 Proposed Attorneys for Chapter 11 Debtor  
 and Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**

9 **DISTRICT OF NEVADA**

10  
 11 In re

Case No. 22-11824-abl

Chapter 11

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 13 Front Sight Management LLC,  
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**PROCEDURES FOR PROVIDING NOTICING IN THE CHAPTER 11 CASE**

**I. INTRODUCTION**

An order for relief was entered in the chapter 11 case (the “Chapter 11 Case”) of the above-captioned debtor (“Debtor”) on May 24, 2022.

On \_\_\_\_\_, 2022, the Court entered an order (the “Notice Procedures Order”) pursuant to 11 U.S.C. §§ 102 and 105, Rules 2002, 9007, and 9036 of the Federal Rules of Bankruptcy Procedure, and Rule 2002 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of Nevada approving the notice procedures (the “Notice Procedures”). These Notice Procedures apply only in the Chapter 11 Case and not to any adversary proceedings relating to the Chapter 11 Case.

All documents filed in the Chapter 11 Case, including the Notice Procedures Order, are publicly available at:

[www.cases.stretto.com/frontsight](http://www.cases.stretto.com/frontsight)

Such documents are also available, for a nominal fee, through the PACER system on the Court’s website at <http://www.nvb.uscourts.gov/case-info/> or by visiting the Clerk’s Office during normal business hours.

Pursuant to the Notice Procedures Order, all notices, motions, applications, briefs, memoranda, exhibits, affidavits, declarations, objections, responses, replies, and other documents filed in the Chapter 11 Case are subject to the Notice Procedures. Additionally, while the Bankruptcy Code, Bankruptcy Rules, and the Local Bankruptcy Rules apply to the Chapter 11 Case, to the extent there is a conflict between the foregoing and the Notice Procedures, the Notice Procedures shall govern in all respects. **Accordingly, all parties in interest are strongly encouraged to review these Notice Procedures in their entirety and consult their own legal counsel with respect to any of the matters discussed herein prior to filing any documents in the Chapter 11 Case.**

**II. FILING PROCEDURES**

All notices, motions, applications, and other requests for relief, briefs, memoranda, exhibits, affidavits, declarations, replies, and other documents filed in support of such papers seeking relief (collectively, the “Requests for Relief”), and all objections and responses to such Requests for Relief (collectively, the “Objections,” and together with the Requests for Relief and all other filed documents, the “Court Filings”) filed in the Chapter 11 Case shall be filed electronically with the Court on the docket of the case styled *In re Front Sight Management LLC*, Case No. 22-11824-abl, by registered users of the Court’s Case Management/Electronic Case Files (CM/ECF) filing system (the “Electronic Filing System”) or as otherwise permitted by Local Rule 5005 or other applicable rules. Pursuant to Local Rule 9014(e)(2), courtesy copies of Court Filings relating to matters set for hearing must be delivered to the clerk’s office no later than two (2) business days after filing; except for matters set on shortened time, which must be delivered to the court no later than (1) business day after filing. The address for courtesy copies is as follows:

1 Chambers of Chief Judge August B. Landis  
2 U.S. Bankruptcy Court, District of Nevada  
3 Foley Federal Building  
4 300 Las Vegas Boulevard South  
5 Las Vegas, NV 89101

6 Proofs of claim shall *not* constitute Court Filings and shall be filed with Stretto (the “Notice Agent”) at the addresses set forth in the “Notice of Chapter 11 Bankruptcy Case, Meeting of Creditors & Deadlines” approved by the Notice Procedures Order and provided herewith.

7 **III. NOTICE AND SERVICE PROCEDURES**

8 Service of all Court Filings shall be effected within two (2) business days after the filing  
9 thereof, in the manner set forth in these Notice Procedures. Notice and service accomplished in  
10 accordance with these Notice Procedures shall be deemed adequate in all respects pursuant to the  
11 Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules.

12 **A. Procedures for the Debtor’s Members to Receive Notice**

13 Notice Agent shall send an email to the Debtor’s members with instructions on regarding  
14 subscribing to receive notices in the Debtor’s chapter 11 case. The instructions will include a  
15 deadline to subscribe and the procedures for doing so. Should any member not subscribe by the  
16 deadline, the Debtor will not be required to provide the member with any further notices in the  
17 Debtor’s chapter 11 case but the Debtor may opt to provide further electronic service from time to  
18 time.

19 **B. Service Lists**

20 **1. The Master Mailing List**

21 The Notice Agent shall prepare and maintain a master mailing list in accordance with Local  
22 Rule 1007(b) (the “Master Mailing List”) and the order on the Motion. To the extent that any person  
23 or entity on the Master Mailing List submits a writing to the Notice Agent requesting that the person  
24 or entity no longer receive notices relating to the Chapter 11 Case, such person or entity may be  
25 removed from the Master Mailing List by the Notice Agent.

26 **2. The Core Service List**

27 Notice Agent shall maintain a core service list (the “Core Service List”). The Core Service  
28 List shall be made available by (i) accessing the Case Website, (ii) contacting Notice Agent directly,  
or (iii) contacting the Debtor’s counsel directly. The Core Service List shall include the following  
parties:

- 29 i. Front Sight Management LLC, 1 Front Sight Road, Pahrump, NV 89061, Attn:  
30 Ignatius Piazza;
- 31 ii. Counsel to Debtor, BG Law LLP, 300 S. 4<sup>th</sup> Street, Suite 1550, Las Vegas, NV  
32 89101, Attn: Steven T. Gubner (sgubner@bg.law) and Susan K. Seflin  
33 (sseflin@bg.law);

- 1           iii.    The Office of the United States Trustee for the District of Nevada (the “United States Trustee”), United States Trustee, 300 Las Vegas Blvd. South #4300, Las Vegas, NV 89101;
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- 3           iv.    All secured creditors;
- 4           v.    Counsel to any statutory committee of unsecured creditors (the “Creditors Committee”), or, until such time as any committee is appointed, the entities listed on the list of twenty (20) largest creditors filed by the Debtor in the Chapter 11 Case at the addresses indicated thereon;
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- 6
- 7           vi.    Internal Revenue Service, P.O. Box 7346, Philadelphia, PA 19101-7346;<sup>1</sup>;
- 8           vii.   Nevada Department of Taxation, Bankruptcy Section, 555 E. Washington Ave., #1300, Las Vegas, NV 89101; and
- 9
- 10          viii.   Nye County Treasurer’s Office, 170 N. Floyd Street, Suite 2, Pahrump, NV 89060.

11                           **3.     The 2002 List**

12                           The Notice Agent shall maintain a list of all parties that have filed a request to receive  
 13 service of Court Filings pursuant to Bankruptcy Rule 2002 (the “2002 List,” and, together with the  
 14 Core Service List, but not the Master Mailing List, the “Limited Service Lists”). The 2002 List shall  
 15 be made available by (i) accessing the Case Website; (ii) contacting the Notice Agent directly; or  
 (iii) contacting Debtor’s counsel directly.

- 16           i.    **Filing Requests for Documents Requires Email Address.** A request for service  
 17 of Court Filings pursuant to Bankruptcy Rule 2002 (each, a “2002 Notice  
 18 Request”) filed with the Court shall be deemed proper only if it includes the  
 19 following information with respect to the party filing such request: (a) name; (b)  
 20 street address; (c) name of client(s), if applicable; (d) telephone number; (e)  
 21 facsimile number; and (f) email address. A 2002 Notice Request containing an  
 22 email address shall be deemed (1) an agreement between such entity and any  
 23 person giving notice in the Chapter 11 Case via email to the email address  
 24 indicated for all purposes with respect to the Chapter 11 Case under Bankruptcy  
 25 Rule 2002(g)(4); (2) a request for noticing to such email address pursuant to  
 26 Bankruptcy Rule 9036; and (3) a written consent to service by electronic means  
 for the purposes of Rule 5(b)(E) of the Federal Rules of Civil Procedure. This  
 27 provision shall apply to 2002 Notice Requests received prior to and after the date  
 of entry of the Notice Procedures Order. It is each party’s responsibility to ensure  
 that an email containing the phrase “BK-22-11824-abl” in the subject line is  
 exempted from any “spam” or similar email filter.
- 28           ii.   **Certification Opting Out of Email Service.** Any party filing a 2002 Notice  
 Request who does not maintain (and cannot practicably obtain) an email address

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<sup>1</sup> Together with the United States Trustee and the addresses that follow, these are the addresses required for service as listed in the “Register of Mailing Addresses of Federal and State Governmental Units” in the applicable jurisdictions.

and cannot receive service by email must include in the 2002 Notice Request a certification to that effect (a “Certification”). A Certification shall include a statement certifying that the party (a) does not maintain an email address; and (b) cannot practicably obtain an email address at which the party could receive service. Such party will thereafter receive paper service in lieu of email service under these Notice Procedures.

iii. **Email Address Required.** If a 2002 Notice Request fails to include an email address or a Certification, such party shall not be added to the 2002 List or served with copies of Court Filings unless such Court Filings directly affect such party or unless such Court Filings are made on the Master Mailing List and such party is listed on the Master Mailing List. To the extent a 2002 Notice Request was filed prior to entry of the Notice Procedures Order, Debtor shall request an email address. If no email address or Certification is provided in response to such request, such party shall not be added to the 2002 List or served with copies of Court Filings unless such Court Filings directly affect such party or unless such Court Filings are made on the Master Mailing List and such party is listed on the Master Mailing List.

iv. **Changes in Information.** Each party submitting a 2002 Notice Request is responsible for filing with the Court an updated 2002 Notice Request as necessary to reflect changes to any notice information and must serve a copy of such updated 2002 Notice Request upon the Debtor.

**4. Service List Maintenance and Access**

At least every 30 days, Notice Agent shall update the Service Lists by making any necessary additions and deletions and post the updated Service Lists on the Case Website. Notice Agent shall post the 2002 List on the Case Website commencing as of the date that is no later than ten (10) days from the date of entry of the Notice Procedures Order.

**C. Service Generally**

Other than (i) service of a summons and complaint in an adversary proceeding; (ii) documents filed under seal; and (iii) proofs of claim, which shall be filed with the Notice Agent, all Court Filings shall be filed electronically with the Court using the Court’s Electronic Filing System and such Court Filings shall be served *via* email on the Limited Service Lists, which shall be deemed to constitute proper service for all parties who are sent such email service; *provided, however*, that the notice of hearing related to any Request for Relief and the first (1) page of any Objection shall also be served on the Core Service List by first class mail. Anytime the Notice Procedures require that service be made by any means other than email, the Court Filing may be printed doubled-sided, the print-size may be reduced, and/or each page of the mailing may contain more than one page of the Court Filing. Service by email may be effectuated by filing a document through the Court’s Electronic Filing System and having that system generate a notice that includes a link to such document. All other service by email shall be effectuated through a separate email sent by or on behalf of the noticing party in accordance with the rules set forth below:

i. **Email Subject Line and Content.** With respect to the email service of any Court Filing, the subject line of the email shall be “Notice Bankr. D. Nev. 22-11824-abl” The body of the email shall contain (i) the summary description of the

1 document(s) being served (as appears on the Court’s docket) and/or (ii) the full  
2 title of the document(s) being served and the name of the party filing such  
document(s).

- 3 ii. **Link to Attachments.** The Court Filings served by email shall be included in a  
4 link within the email for users to access PDFs of the Court Filings.

5 Notwithstanding anything else set forth in these Notice Procedures or other applicable  
6 rules, certificates of service and 2002 Service Requests need only be filed on the Court’s Electronic  
Filing System and shall not be served by email or otherwise.

7 **D. Limitations on Service on all Creditors; Service on Particular Affected Parties**

8 Except as otherwise specifically provided herein, with respect to any Court Filing that is  
9 required to be served on all creditors, the parties shall serve the notice of hearing with respect to  
10 such Requests for Relief or the first page of such Objection only on (i) the Limited Service Lists; and  
11 (ii) the persons specified under the applicable circumstances (in each applicable circumstance, an  
“Affected Party”) as follows:

- 12 i. in the case of any use, sale, lease, or abandonment of less than substantially all of  
the Debtor’s property, on each party asserting an interest in that property;
- 13 ii. in the case of any relief from or modification of the automatic stay, on each party  
14 asserting a lien or other interest in the affected property;
- 15 iii. in the case of the use of cash collateral or obtaining of credit, on each party  
16 asserting an interest in the cash collateral or a lien or other interest in property  
upon which a lien or other interest is proposed to be granted;
- 17 iv. in the case of a motion under Bankruptcy Rule 9019, on all parties to the relevant  
18 compromise and settlement, or that may be directly affected by such compromise  
or settlement;
- 19 v. in the case of assumption, assignment, or rejection of an executory contract or an  
20 unexpired lease, on each party to the executory contract or the unexpired lease;
- 21 vi. any objection, opposition, response, reply, or further document filed directly in  
22 response to another party’s Court Filing, on such other party; and
- 23 vii. all other parties as directed by the Court.

24 Service upon any Affected Party not included in a Limited Service List shall be effected by  
25 first class mail, private mail service, or hand delivery. Service upon any Affected Party included in a  
26 Limited Service List shall be effected as otherwise permitted in these Notice Procedures for service  
upon a Limited Service List.

27 The limitations set forth above in this Section B above shall not apply to Court Filings made  
pursuant to the following Bankruptcy Rules (the “Excluded Court Filings”):

- 28 i. Bankruptcy Rule 2002(a)(1) (meeting of creditors pursuant to Bankruptcy Code  
section 341);

- ii. Bankruptcy Rule 2002(a)(2) (any proposed use, sale, or lease of property of the estate other than in the ordinary course of business), but only to the extent that such proposed use, sale or lease concerns all or substantially all of the Debtor's assets;
- iii. Bankruptcy Rule 2002(a)(4) (hearing on the dismissal of the case or the conversion of the case to another chapter);
- iv. Bankruptcy Rule 2002(a)(5) (time fixed to accept or reject a proposed modification of a chapter 11 plan);
- v. Bankruptcy Rule 2002(a)(7) (time fixed for filing a proof of claim pursuant to Bankruptcy Rule 3003(c));
- vi. Bankruptcy Rule 2002(b)(1) (time fixed for filing objections to and any hearing to consider approval of a disclosure statement);
- vii. Bankruptcy Rule 2002(b)(2) (time fixed for filing objections to and any hearing to consider confirmation of a chapter 11 plan);
- viii. Bankruptcy Rule 2002(f)(1) (entry of an order for relief);
- ix. Bankruptcy Rule 2002(f)(2) (dismissal or conversion of a case to another chapter of the Bankruptcy Code);
- x. Bankruptcy Rule 2002(f)(3) (time allowed for filing claims pursuant to Bankruptcy Rule 3002);
- xi. Bankruptcy Rule 2002(f)(6) (waiver, denial, or revocation of a discharge as provided in Bankruptcy Rule 4006);
- xii. Bankruptcy Rule 2002(f)(7) (entry of an order confirming a chapter 11 plan); and
- xiii. Bankruptcy Rule 2002(f)(8) (summary of the trustee's final report and account should a case be converted to chapter 7 of the Bankruptcy Code).

Service of Excluded Court Filings shall be made on all persons identified on the Master Mailing List as well as all equity security holders to the extent required by Bankruptcy Rule 2002(d). Where required, service on any such person not included in a Limited Service List shall be effected by first class mail, private mail service, or hand delivery; *provided, however*, that service of the Excluded Court Filings shall be limited as follows: (i) with respect to Requests for Relief, only service of the notice of hearing is required; and (ii) with respect to Objections, only service of the first page of the Objection is required. Service upon any such person included on the Limited Service List shall be effected as otherwise permitted in these Notice Procedures for service upon the Limited Service List.

#### **E. Service of Orders**

All parties submitting orders in accordance with applicable Bankruptcy Rules and Local Rules shall, within two business days after entry thereof, serve a copy of the entered order on (i) the

1 Limited Service Lists, (ii) any Affected Party, and (iii) Notice Agent. Notice Agent shall post all  
2 orders on the Case Website.

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# EXHIBIT B

**Fill in this information to identify the case:**

Debtor 1 Front Sight Management LLC

Debtor 2  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

Official Form 410

**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim) \_\_\_\_\_

Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?

No

Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name _____	Name _____
	Number _____ Street _____	Number _____ Street _____
	City _____ State _____ ZIP Code _____	City _____ State _____ ZIP Code _____
	Contact phone _____	Contact phone _____
	Contact email _____	Contact email _____
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	

4. Does this claim amend one already filed?

No

Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No

Yes. Who made the earlier filing? \_\_\_\_\_

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_ \_

7. How much is the claim? \$\_\_\_\_\_. Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.

**Nature of property:**  
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_

**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)

**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_

**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_

**12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

No

Yes. Check one:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)(    ) that applies.

**Amount entitled to priority**

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

**The person completing this proof of claim must sign and date it. FRBP 9011(b).**

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

**A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.**

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date \_\_\_\_\_  
MM / DD / YYYY

\_\_\_\_\_  
Signature

**Print the name of the person who is completing and signing this claim:**

Name \_\_\_\_\_  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_  
Number Street

City State ZIP Code

Contact phone \_\_\_\_\_ Email \_\_\_\_\_

# EXHIBIT C

Information to identify the case:			
Debtor	Front Sight Management LLC Name	EIN	77 - 0306282
United States Bankruptcy Court for the:	District of Nevada (State)	[Date case filed for chapter 11	05/24/2022 MM / DD / YYYY OR
Case number:	22-11824-abl	[Date case filed in chapter	MM / DD / YYYY
		Date case converted to chapter 11	MM / DD / YYYY

## Official Form 309F1 (For Corporations or Partnerships)

**Notice of Chapter 11 Bankruptcy Case**

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

1. **Debtor's full name** Front Sight Management LLC

2. **All other names used in the last 8 years** Front Sight Firearms Training Institute; Front Sight Resorts; Front Sight

3. **Address** 1 Front Sight Road, Pahrump, NV 89061

4. **Debtor's attorney** Susan Sefflin, BG Law, 300 S. 4th St., Ste 1550, Las Vegas, NV 89101  
Name and address  
Contact phone (702) 835-0800  
Email ssefflin@bg.law

5. **Bankruptcy clerk's office**  
Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at <https://pacer.uscourts.gov>.  
Address U.S. Bankruptcy Court, District of Nevada  
Foley Federal Building and U.S. Courthouse  
300 Las Vegas Boulevard South  
Las Vegas, NV 89101  
Hours open: 8AM - 4PM Mon-Fri  
Phone Contact: Please contact Stretto, the court-appointed claims and noticing agent by calling 855-423-1655 (toll free) or 949-241-8683 (international)

6. **Meeting of creditors**  
The debtor's representative must attend the meeting to be questioned under oath.  
Creditors may attend, but are not required to do so.  
Date June 23, 2022 at 9:00 AM  
Time  
Location: Call-in Number: 877-920-8646  
Passcode: 7968994  
The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

For more information, see page 2 ►

Debtor Front Sight Management, LLC  
NameCase number (if known) 22-11824-abl

<p><b>7. Proof of claim deadline</b></p>	<p><b>Where to file your claim:</b></p> <p>Front Sight Claims Processing c/o Stretto 410 Exchange, Suite 100 Irvine, CA 92602</p> <p>If by electronic transmission: <a href="http://www.cases.stretto/frontsight">www.cases.stretto/frontsight</a></p> <p>A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at <a href="http://www.uscourts.gov">www.uscourts.gov</a>, the claims agent website at <a href="https://cases.stretto.com/frontsight">https://cases.stretto.com/frontsight</a> and any bankruptcy clerk's office.</p> <p>Your claim will be allowed in the amount scheduled unless:</p> <ul style="list-style-type: none"> <li>■ your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>;</li> <li>■ you file a proof of claim in a different amount; or</li> <li>■ you receive another notice.</li> </ul> <p>If your claim is not scheduled or if your claim is designated as <i>disputed</i>, <i>contingent</i>, or <i>unliquidated</i>, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.</p> <p>You may review the schedules at the bankruptcy clerk's office or online at <a href="https://pacer.uscourts.gov">https://pacer.uscourts.gov</a>.</p> <p>Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.</p>	<p><b>Deadline for filing proof of claim:</b></p> <p><b>General Bar Date: July 15, 2022</b></p> <p><b>Governmental Bar Date: November 21, 2022</b></p>
<p><b>8. Exception to discharge deadline</b></p> <p>The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.</p>	<p>If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.</p> <p><b>Deadline for filing the complaint:</b> _____</p>	
<p><b>9. Creditors with a foreign address</b></p>	<p>If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.</p>	
<p><b>10. Filing a Chapter 11 bankruptcy case</b></p>	<p>Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.</p>	
<p><b>11. Discharge of debts</b></p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.</p>	

# EXHIBIT D



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

7 Proposed Attorneys for Chapter 11 Debtor  
 and Debtor in Possession

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

<p>11</p> <p>12 In re</p> <p>13 Front Sight Management LLC,</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p>
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18 **NOTICE OF BAR DATE FOR FILING PROOFS OF CLAIMS**

19

20 TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST FRONT SIGHT  
 MANAGEMENT, LLC:

21

22 Please take notice that, on \_\_\_\_\_, 2022, the United States Bankruptcy Court for  
 the District of Nevada (the “Court”), having jurisdiction over the Chapter 11 Case of Front Sight  
 23 Management LLC (“Debtor”) entered an order (the “Bar Date Order”) establishing (i) **July 15, 2022**  
 at 11:59 p.m. (Pacific Time) as the last date and time for each person or entity (including, without  
 24 limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim  
 (“Proof of Claim”) based on prepetition claims against the Debtor (the “General Bar Date”); and (ii)  
 25 **November 21, 2022 at 11:59 p.m. (Pacific Time)** as the last date and time for each governmental  
 unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on  
 26 prepetition claims against Debtor (the “Governmental Bar Date” and, together with the General Bar  
 Date, the “Bar Dates”). The Bar Date Order, the Bar Dates, and the procedures set forth below for  
 27 the filing of Proofs of Claim apply to all claims against Debtor (other than those set forth below as  
 28

1 being specifically excluded) that arose prior to May 24, 2022, the date on which Debtor commenced  
 2 its case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

### 3 **1. WHO MUST FILE A PROOF OF CLAIM**

4 You MUST file a Proof of Claim to share in any distribution by Debtor if you have a claim  
 5 that occurred prior to May 24, 2022, and it is not one of the other types of claims described in  
 6 Section 2 below. Acts or omissions of Debtor that arose before May 24, 2022 may give rise to  
 7 claims against Debtor that must be filed by the applicable Bar Date, notwithstanding that such claims  
 8 may not have matured or become fixed or liquidated or certain prior to May 24, 2022. Pursuant to  
 9 section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a  
 10 right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed,  
 11 contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b)  
 12 a right to an equitable remedy for breach of performance if such breach gives rise to a right to  
 13 payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent,  
 14 matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured  
 15 claims, secured claims, and priority claims.

### 16 **2. WHO NEED NOT FILE A PROOF OF CLAIM**

17 You need *not* file a Proof of Claim if:

- 18 a. any person or entity whose claim is listed on the Debtor’s Schedules D, E and/or F  
 19 (the “Schedules”) and (i) whose claim is not described thereon as “disputed,”  
 20 “contingent,” or “unliquidated,” (ii) who does not dispute the amount or classification  
 21 of the claim set forth in the Schedules, and (iii) who does not dispute that the claim is  
 22 an obligation of the Debtor against which the claim is listed on the Schedules;
- 23 b. any person or entity whose claim has been paid in full;
- 24 c. any person or entity that holds an interest in Debtor, which interest is based  
 25 exclusively upon the ownership of common or preferred stock, membership interests,  
 26 partnership interests, or warrants or rights to purchase, sell or subscribe to such a  
 27 security or interest; provided, however, that interest holders that wish to assert claims  
 28 (as opposed to ownership interests) against the Debtor that arise out of or relate to the  
 ownership or purchase of an interest, including claims arising out of or relating to the  
 sale, issuance, or distribution of the interest, must file Proofs of Claim on or before  
 the applicable Bar Date, unless another exception identified herein applies;
- d. any holder of a claim allowable under sections 503(b) and 507(a)(2) of the  
 Bankruptcy Code as an administrative expense (other than a holder of a 503(b)(9)  
 Claim);
- e. any person or entity that holds a claim that has been allowed by an order of this Court  
 entered on or before the applicable Bar Date;
- f. any holder of a claim for which a separate deadline is fixed by this Court;

- g. any holder of a claim who has already properly filed a Proof of Claim with the Clerk of the Court against Debtor, utilizing a claim form which substantially conforms to the Proof of Claim Form or Official Form 410; or
- h. any person or entity that relies on the Schedules has the responsibility to determine that the claim is accurately listed in the Schedules.

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST DEBTOR. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT DEBTOR OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.**

### **3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable Bar Date, and (ii) the date which is thirty days following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of May 24, 2022 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable Bar Date unless an exception identified above applies.

### **4. WHEN AND WHERE TO FILE**

All Proofs of Claim must be filed so as to be actually received on or before the applicable Bar Date at the following address:

If sent by first class mail:

Front Sight Claims Processing  
c/o Stretto  
410 Exchange, Suite 100  
Irvine, CA 92602

If sent by electronic mail:

[www.cases.stretto.com/frontsight](http://www.cases.stretto.com/frontsight)

Proofs of Claim will be deemed timely filed only if actually received by the Debtor's Noticing and Claims Agent, Stretto, on or before the applicable Bar Date.

### **5. WHAT TO FILE.**

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to Official Bankruptcy Form No. 410; (iv) set forth with specificity the legal and factual basis for the alleged claim; (v) include supporting documentation or an explanation as to why such documentation is not available; and (vi) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

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**6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE**

*Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against Debtor, will be forever barred, estopped and enjoined from asserting the claim against Debtor and its estate (or filing a Proof of Claim with respect to the claim), and Debtor and its estate, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to participate in any distribution in Debtor’s Chapter 11 Case on account of the claim, or receive further notices with respect to the Chapter 11 Case.*

If you have any questions relating to this Notice, please feel free to contact Jessica Wellington at (702) 835-0800 or by e-mail at [jwellington@bg.law](mailto:jwellington@bg.law) or the Debtor’s Noticing and Claims Agent, Stretto, at (855) 423-1655 (toll-free) or (949) 241-8683 (international) or by email at [TeamFrontSight@stretto.com](mailto:TeamFrontSight@stretto.com)

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY OTHER QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

DATED: May 24, 2022

BG LAW LLP

By: /s/ Jessica S. Wellington  
Steven T. Gubner  
Susan K. Seflin  
Jessica Wellington  
300 S. 4<sup>th</sup> Street, Suite 1550  
Las Vegas, NV 89101  
[Proposed] Attorneys for Chapter 11  
Debtor and Debtor in Possession