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E-Filed: July 11, 2022

4 **UNITED STATES DEPARTMENT OF JUSTICE**
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10 TRACY HOPE DAVIS

11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re

14 **FRONT SIGHT MANAGEMENT LLC,**

15 Debtor.

16 Case No: BK-S-22-11824-ABL
17 Chapter 11

18 Date: July 25, 2022

19 Time: 9:30 a.m.

20 Location: Foley Courtroom 1, Remote

21 **THE UNITED STATES TRUSTEE’S RESPONSE AND RESERVATION OF RIGHTS TO**
22 **DEBTOR’S APPLICATION TO EMPLOY LUCAS HORSFALL AS**
23 **ACCOUNTANT PURSUANT TO 11 U.S.C. §§ 327(a), 328(a) AND 330**
24 **EFFECTIVE AS OF THE PETITION DATE [ECF No. 200]**

25 To the Honorable AUGUST B. LANDIS, Chief United States Bankruptcy Judge:

26 Tracy Hope Davis, United States Trustee for Region 17 (the “U.S. Trustee”),

27 by and through her undersigned counsel, hereby files this response and reservation of rights to the
28 *Debtor’s Application to Employ Lucas Horsfall as Accountant Pursuant to 11 U.S.C. §§ 327(a),*
328(a) and 330 Effective as of the Petition Date [ECF No. 200] .¹

¹ Unless otherwise noted: “Section” refers to a section of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”); “ECF No.” refers to the bankruptcy docket for case number 22-11824-ABL; “FRBP” refers to the Federal Rules of Bankruptcy Procedure; “FRE” refers to the Federal Rules of Evidence.

1 1. On June 27, 2022, Debtor filed an application to employ Lucas Horsfall as its
2 accountant (“Application”) and set it for hearing on July 25, 2022. [ECF No. 200] ²

3 2. The deadline for opposition to be filed to the Application is July 11, 2022. [ECF
4 No.205].

5 3. The U.S. Trustee and Debtor’s Counsel are engaged in a dialogue concerning issues
6 the U.S. Trustee has raised informally, and additional information will be forthcoming from
7 Debtor.

8 4. Until this information has been received and reviewed, the U.S. Trustee reserves all
9 her rights under the Bankruptcy Code and FRBP, including to object to the Application and any
10 amendments or supplements to the Application, prior to or at the hearing.

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12 Dated: July 11, 2022

Respectfully Submitted,

13 TRACY HOPE DAVIS
14 UNITED STATES TRUSTEE

15 By: /s/ Terri H. Didion
16 Terri H. Didion, Asst. U.S. Trustee

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25 ² The U.S. Trustee requests that the Court take judicial notice of the pleadings and documents
26 filed in this case, pursuant to Federal Rule of Bankruptcy Procedure (“FRBP”) 9017 and Federal
27 Rule of Evidence (“FRE”) 201. To the extent that the U.S. Trustee’s objection contains factual
28 assertions predicated upon statements made by Debtor, any of its current or former affiliates,
agents, attorneys, professionals, officers, directors or employees, the U.S. Trustee submits that
such factual assertions are supported by admissible evidence in the form of admissions of a party
opponent under FRBP 9017 and FRE 801(d)(2).