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In re:

1	CARLYON CICA CHTD.
	DAWN M. CICA, ESQ.
2	Nevada Bar No. 4565
	TRACY M. O'STEEN, ESQ.
3	Nevada Bar No. 10949
	265 E. Warm Springs Road, Suite 107
4	Las Vegas, NV 89119
	PHONE: (702) 685-4444
5	FAX: (725) 220-4360
	Email: DCica@CarlyonCica.com
6	TOSteen@CarlyonCica.com
	Proposed Nevada Counsel for Official
7	Committee of Unsecured Creditors

KELLEY DRYE & WARREN LLP

ROBERT L. LEHANE, ESQ. (Admitted pro hac vice)
New York Bar No. 2937761
JASON R. ADAMS, ESQ. (Admitted pro hac vice)
New York Bar No. 3972106
LAUREN S. SCHLUSSEL, ESQ. (Admitted pro hac vice)

New York Bar No. 4801742 3 World Trade Center 175 Greenwich Street New York, NY 10007 PHONE: (212) 808-7800

FAX: (212) 808-7897 Email: RLehane@kelleydrye.com JAdams@ kelleydrye.com

LSchlussel@kelleydrye.com
Proposed Counsel to the Official Committee of

Unsecured Creditors

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

FRONT SIGHT MANAGEMENT LLC,
Debtor.

FRONT SIGHT MANAGEMENT LLC, a
Nevada limited liability company,
v.

LAS VEGAS DEVELOPMENT FUND LLC, a
Nevada limited liability company, et al.

And all related counterclaims.

Case No. 22-11824-abl Chapter 11

Adv. No. 22-01116-abl

DECLARATION OF TRACY M.
O'STEEN, ESQ. IN SUPPORT OF EX
PARTE APPLICATION FOR ORDER
SHORTENING TIME FOR HEARING ON
MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS' TO INVERVENE UNDER
BANKRUPTCY RULE 7024

Hearing Date: N/A Hearing Time: N/A

TRACY M. O'STEEN, ESQ., being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law in the state of Nevada and admitted to practice before this Court. I am an attorney with the law firm of Carlyon Cica Chtd., proposed Nevada counsel to the Official Committee of Unsecured Creditors in the above-captioned

bankruptcy case (the "<u>Committee</u>"). I make this declaration in support of the Committee's *Ex Parte Application for Order Shortening Time for Hearing on Motion of the Official Committee of Unsecured Creditors to Intervene Under Bankruptcy Rule 7024* (the "<u>Application</u>").

- 2. The following facts are personally known to me, unless otherwise stated to be upon information and belief, and if called to testify thereto, I could and would do so competently under oath.
- 3. The Application seeks an order shortening time to hear the *Motion of the Official Committee of Unsecured Creditors to Intervene Under Bankruptcy Rule 7024* (the "Motion to Intervene") in this adversary case to the same time set for hearing the Motion to Remand, filed by Las Vegas Development Fund LLC ("LVDF") which is July 25, 2022 at 9:30 a.m. If the Motion to Intervene is heard in the ordinary course then the hearing on the Motion to Remand will be held before the Committee has an opportunity to present its objections to remand to the Court. The Committee respectfully requests that the Court shorten the notice required for the hearing on the Motion to Intervene so that it can be heard on July 25, 2022 at the time the Motion to Remand is set for hearing.
- 4. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

DATED this 11th day of July 2022.

/s/ Tracy M. O'Steen, Esq.
TRACY M. O'STEEN, ESQ.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court which sent e-mail notification of such filing to all CM/ECF participants in this case as indicated on the service list on July 11, 2022.

/s/ Cristina Robertson
Cristina Robertson