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12 Attorneys for Chapter 11 Debtor
 13 and Debtor in Possession

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

<p>13 In re:</p> <p>14 Front Sight Management LLC,</p> <p>15</p> <p>16</p> <p>17 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p>
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NOTICE OF INTENT TO ISSUE SUBPOENAS

19 Front Sight Management LLC, the chapter 11 debtor and debtor in possession herein, by and
 20 through its counsel of record, BG Law LLP, hereby provides notice of intent to issue subpoenas to
 21 the following parties: (i) Michael Meacher; and (ii) Dianne Meacher. Copies of the subpoenas are
 22 attached hereto as Exhibits 1, 2, 3 and 4.

23 DATED: July 18, 2022 BG LAW LLP

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

EXHIBIT “1”

UNITED STATES BANKRUPTCY COURT

District of Nevada

In re Front Sight Management LLC Debtor

Case No. 22-11824-abl

Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Michael Meacher (Name of person to whom the subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

Table with 2 columns: PLACE (Via Zoom - Instructions to Follow Separately) and DATE AND TIME (August 2, 2022 at 9:30 a.m.)

The examination will be recorded by this method: By audio and/or video technology in addition to stenographically

Production: You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 7/18/2022

CLERK OF COURT Signature of Clerk or Deputy Clerk

OR Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Front Sight Management LLC, who issues or requests this subpoena, are:

Steven T. Gubner, BG Law LLP, 300 S. 4th Street, Suite 1500, Las Vegas, NV 89101; sgubner@bg.law; (702) 835-0800

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT “2”

UNITED STATES BANKRUPTCY COURT

District of Nevada

In re Front Sight Management LLC Debtor

Case No. 22-11824-abl

(Complete if issued in an adversary proceeding)

Chapter 11

Plaintiff v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Michael Meacher (Name of person to whom the subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit 1 attached hereto.

Table with 2 columns: PLACE (BG Law LLP, 300 4th Street, Suite 1500, Las Vegas, NV 89101 or electronically via DropBox or similar application) and DATE AND TIME (08/01/22 9:30 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: PLACE and DATE AND TIME

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/18/22

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Front Sight Management LLC, who issues or requests this subpoena, are:

Steven T. Gubner, BG Law LLP, 300 S. 4th Street, Suite 1500, Las Vegas, NV 89101; sgubner@bg.law; (702) 835-0800

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...
(g) Contempt. The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**EXHIBIT 1 TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR
ADVERSARY PROCEEDING)**

I.

INSTRUCTION AND PRELIMINARY STATEMENT

The following instructions shall be considered to be applicable to all demands for production of documents contained herein:

A. In producing documents and things, you are requested to furnish all documents known or available to you, regardless of whether these documents are in your possession, custody or control or are possessed by any subsidiary or affiliated entities, officers, directors, agents, employees, representatives, investigators, or by your attorneys or their agents, employees, representatives or investigators.

B. In producing documents, any comment, notation, or marking appearing on any document and not a part of the original is to be considered a separate document, and any draft, preliminary form or superseded version of any document is also to be considered a separate document.

C. In producing documents, all documents should be produced in the same order as they are kept or maintained.

D. In producing documents, all documents should be produced in the file, folder, envelope or other container in which the documents are kept or maintained. If for any reason said container cannot be produced, please produce copies of all labels or other identifying markings.

E. In producing documents, documents attached to each other must not be separated.

F. In producing documents, if you assert any privilege concerning the identification or production of any of the documents described below, or if you object to the identification or production of any such documents on any grounds, or if you for any reason contend that any of the documents described below are not subject to discovery for any reason, then specify in detail in your response, the precise grounds for the objection, privilege, or other contention which you make in this regard, and describe in detail the document or documents as to which you assert this privilege,

1 objection or contention. Such description shall include a statement of the general nature of the
2 document, the name of each person who executed it, the name of each person who has received the
3 original or copies of it, the name of each person who has seen the original or any copies of it, the
4 name of each person with whom it was discussed, and a general description of the nature and
5 contents of the documents. Finally, you should identify and produce for inspection and copying all
6 documents which fit the description set forth below as to which you do not assert any such privilege,
7 objection or contention.

8 G. In producing documents, the words “and” and “or” shall be construed conjunctively
9 or disjunctively, whichever makes the request more inclusive. The term “any” includes the word
10 “all”; the term “all” includes the word “any.” The terms “all,” “each,” and “every” shall be
11 construed so as to make the request more inclusive.

12 II.

13 DEFINITIONS

14 1. The terms “YOU” and “YOUR” shall refer to Michael Meacher, and any attorneys,
15 agents and/or representatives acting on your behalf.

16 2. “BFS” shall refer to Bankgroup Financial Services.

17 3. “COMMUNICATIONS” shall mean correspondence, telephone conversations,
18 voicemails, person-to-person conversations, memoranda, e-mails, text messages (including SMS and
19 MMS), voice messages, instant messages, direct messages (including any messages on any social
20 media platform or app), facsimiles, telegrams, press releases, announcements, audio and video
21 recordings and all other forms of communicating language or thought.

22 4. “CONSULTING AGREEMENT” shall refer to the Consulting Agreement between
23 BFS and the Debtor dated July 1, 2010, and any amendments thereto including the Supplemental
24 Agreement dated June 1, 2018.

25 5. “DEBTOR” shall refer to debtor Front Sight Management, LLC, its officers,
26 directors, managers, members, employees, agents and/or representatives acting on its behalf.

27 6. “DOCUMENTS” shall mean and refer to the definition of “writing” set forth in
28 Federal Rule of Evidence 1001, and includes the original and any non-identical duplicates, and both

1 sides thereof, no matter how produced, prepared, stored, recorded, reproduced or transmitted, of
2 handwriting, typewriting, printing, photographing, electronic mail (e-mail) and every other means of
3 recording upon any tangible thing, documents stored in electronic form, computerized records,
4 computer files and all other information capable of being retrieved from a computer, and any other
5 form of communication and representation, including letters, words, pictures, sounds, and symbols,
6 or combinations thereof, and including correspondence, letters and other communications.

7 7. "EMPLOYMENT AGREEMENT" shall refer to the Employment Agreement
8 between the DEBTOR and YOU dated July 7, 2010, and any amendments or supplements thereto.

9 8. The phrase "POSSESSION, CUSTODY or CONTROL" applies to (a) a
10 DOCUMENT in YOUR physical custody; (b) a DOCUMENT that YOU own in whole or in part; (c)
11 a DOCUMENT that YOU have the right by contract, statute, or otherwise to use, inspect, examine,
12 or copy on any terms; (d) a DOCUMENT for which YOU have any understanding (express or
13 implied) that YOU may use, examine, or copy on any terms; or a DOCUMENT that YOU have, as a
14 practical matter, the ability to use, inspect, examine, or copy.

15 9. The term "PROPERTY" means and refers to that certain 550 acres of raw land in
16 Pahrump, Nevada, owned by the DEBTOR.

17 10. "REGARDING" shall mean, pertaining to, mentioning, discussing, including,
18 summarizing, describing, reflecting, containing, referring to, relating to, depicting, connected with,
19 embodying, evidencing, constituting, concerning, reporting, purporting or involving an act
20 occurrence, event, transaction, fact, thing or course of dealing.

21 11. "RELATING," "RELATED TO," "EVIDENCING," or "DEMONSTRATING" shall
22 mean supporting, refuting, undermining, constituting, pertaining to, in connection with, reflecting,
23 referring to, based upon, evidencing, demonstrating, stating or in any manner logically, factually,
24 indirectly or directly, or in any other way connecting to the matter addressed in the request.

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1 III.

2 **DOCUMENTS TO BE PRODUCED**

3 **REQUEST FOR PRODUCTION NO. 1:**

4 All DOCUMENTS RELATING to the formation of BFS, including but not limited to
5 operating agreements, bylaws, and documents filed with the relevant secretary of state of
6 incorporation.

7 **REQUEST FOR PRODUCTION NO. 2:**

8 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING the
9 EMPLOYMENT AGREEMENT, including any amendments and supplements thereto.

10 **REQUEST FOR PRODUCTION NO. 3:**

11 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
12 CONTROL REGARDING the EMPLOYMENT AGREEMENT, including COMMUNICATIONS
13 prior to July 7, 2010.

14 **REQUEST FOR PRODUCTION NO. 4:**

15 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
16 CONTROL REGARDING YOUR employment with the DEBTOR.

17 **REQUEST FOR PRODUCTION NO. 5:**

18 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING all
19 consulting agreements between YOU and the DEBTOR, including any amendments and
20 supplements thereto.

21 **REQUEST FOR PRODUCTION NO. 6:**

22 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
23 CONTROL REGARDING all consulting agreements between YOU and the DEBTOR, including
24 any amendments and supplements thereto.

25 **REQUEST FOR PRODUCTION NO. 7:**

26 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING the
27 CONSULTING AGREEMENT, including all amendments and supplements thereto.
28

1 **REQUEST FOR PRODUCTION NO. 8:**

2 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
3 CONTROL REGARDING the CONSULTING AGREEMENT.

4 **REQUEST FOR PRODUCTION NO. 9:**

5 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING
6 any agreements and/or contracts between YOU and the DEBTOR, including any amendments and
7 supplements thereto.

8 **REQUEST FOR PRODUCTION NO. 10:**

9 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
10 CONTROL REGARDING any agreements and/or contracts between YOU and the DEBTOR,
11 including any amendments and supplements thereto.

12 **REQUEST FOR PRODUCTION NO. 11:**

13 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING
14 any agreements and/or contracts between BFS and the DEBTOR, including any amendments and
15 supplements thereto.

16 **REQUEST FOR PRODUCTION NO. 12:**

17 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
18 CONTROL REGARDING any agreements and/or contracts between BFS and the DEBTOR,
19 including any amendments and supplements thereto.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All UCC financing statements filed by YOU RELATED TO YOUR alleged security interest
22 in the DEBTOR'S personal property.

23 **REQUEST FOR PRODUCTION NO. 14:**

24 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY or
25 CONTROL REGARDING any UCC financing statement filed by YOU RELATED TO YOUR
26 alleged security interest in the DEBTOR'S personal property.
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1 **REQUEST FOR PRODUCTION NO. 15:**

2 All UCC financing statements filed by BFS RELATED TO its alleged security interest in the
3 DEBTOR'S personal property.

4 **REQUEST FOR PRODUCTION NO. 16:**

5 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY or
6 CONTROL REGARDING any UCC financing statement RELATED TO BFS' alleged security
7 interest in the DEBTOR'S personal property.

8 **REQUEST FOR PRODUCTION NO. 17:**

9 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING all
10 payments made to YOU by the DEBTOR, or on the DEBTOR'S behalf, on account of the
11 CONSULTING AGREEMENT.

12 **REQUEST FOR PRODUCTION NO. 18:**

13 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING all
14 payments made to BFS by the DEBTOR, or on the DEBTOR'S behalf, on account of the
15 CONSULTING AGREEMENT.

16 **REQUEST FOR PRODUCTION NO. 19:**

17 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
18 detailed accounting of YOUR alleged claim against the DEBTOR.

19 **REQUEST FOR PRODUCTION NO. 20:**

20 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
21 detailed accounting of BFS' alleged claim against the DEBTOR.

22 **REQUEST FOR PRODUCTION NO. 21:**

23 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING
24 YOUR experience as a Chief Operating Officer prior to YOUR employment at the DEBTOR.

25 **REQUEST FOR PRODUCTION NO. 22:**

26 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING
27 YOUR experience as a Chief Financial Officer prior to YOUR employment at the DEBTOR.
28

1 **REQUEST FOR PRODUCTION NO. 23:**

2 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING the
3 work YOU performed for the DEBTOR under the CONSULTING AGREEMENT.

4 **REQUEST FOR PRODUCTION NO. 24:**

5 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
6 EVIDENCING the work YOU performed for the DEBTOR under the CONSULTING
7 AGREEMENT.

8 **REQUEST FOR PRODUCTION NO. 25:**

9 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING the
10 work BFS performed for the DEBTOR under the CONSULTING AGREEMENT.

11 **REQUEST FOR PRODUCTION NO. 26:**

12 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
13 EVIDENCING the work BFS performed for the DEBTOR under the CONSULTING
14 AGREEMENT.

15 **REQUEST FOR PRODUCTION NO. 27:**

16 All DOCUMENTS, including, but not limited to, all manuals, operating procedures,
17 memoranda, circulars, announcements, and emails, in YOUR POSSESSION, CUSTODY or
18 CONTROL RELATED TO YOUR staffing of the range instructors while YOU were an officer of
19 the DEBTOR.

20 **REQUEST FOR PRODUCTION NO. 28:**

21 All DOCUMENTS, including, but not limited to, all manuals, operating procedures,
22 memoranda, circulars, announcements, and emails, in YOUR POSSESSION, CUSTODY or
23 CONTROL RELATED TO YOUR scheduling of courses while YOU were an officer of the
24 DEBTOR.

25 **REQUEST FOR PRODUCTION NO. 29:**

26 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
27 \$10,000 payment issued by YOU and/or DEBTOR to Bill Cookston in or about the summer of 2019.
28

1 **REQUEST FOR PRODUCTION NO. 30:**

2 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
3 REGARDING a \$10,000 payment issued by YOU and/or DEBTOR to Bill Cookston in or about the
4 summer of 2019.

5 **REQUEST FOR PRODUCTION NO. 31:**

6 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
7 REGARDING a \$10,000 payment issued by YOU and/or DEBTOR to Bill Kapeles in or about the
8 summer of 2019.

9 **REQUEST FOR PRODUCTION NO. 32:**

10 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING any
11 meetings held by and between YOU, Bill Kapeles, and/or Bill Cookston at The Grill Room in
12 Mountain Falls in or about the summer of 2019 while you were an officer of the DEBTOR.

13 **REQUEST FOR PRODUCTION NO. 33:**

14 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
15 REGARDING any meetings held by and between YOU, Bill Kapeles, and/or Bill Cookston at The
16 Grill Room in Mountain Falls in or about the summer of 2019 while you were an officer of the
17 DEBTOR.

18 **REQUEST FOR PRODUCTION NO. 34:**

19 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
20 REGARDING Yvonne Blanco and Keith Henderman in or about the summer of 2019 while you
21 were an officer of the DEBTOR.

22 **REQUEST FOR PRODUCTION NO. 35:**

23 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
24 Kel-Tec brand, 12 gauge shotgun transferred to YOU while you were an officer of the DEBTOR in
25 or about April 2019 and previously transferred by DEBTOR to Bill Laird.
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1 **REQUEST FOR PRODUCTION NO. 36:**

2 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
3 REGARDING a Kel-Tec brand, 12 gauge shotgun transferred to YOU while you were an officer of
4 the DEBTOR in or about April 2019 and previously transferred by DEBTOR to Bill Laird.

5 **REQUEST FOR PRODUCTION NO. 37:**

6 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL between
7 YOU and Bill Kapeles while you were an officer of the DEBTOR.

8 **REQUEST FOR PRODUCTION NO. 38:**

9 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL between
10 YOU and Bill Cookston while you were an officer of the DEBTOR.

11 **REQUEST FOR PRODUCTION NO. 39:**

12 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
13 REGARDING why the DEBTOR entered into the CONSULTING AGREEMENT with BFS instead
14 of YOU.

15 **REQUEST FOR PRODUCTION NO. 40:**

16 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
17 REGARDING what services YOU or BFS performed under the CONSULTING AGREEMENT that
18 benefitted the DEBTOR.

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EXHIBIT “3”

UNITED STATES BANKRUPTCY COURT

District of Nevada

In re Front Sight Management LLC Debtor

Case No. 22-11824-abl

Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Dianne Meacher (Name of person to whom the subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

Table with 2 columns: PLACE (Via Zoom - Instructions to Follow Separately) and DATE AND TIME (August 2, 2022 at 1:00 p.m.)

The examination will be recorded by this method: By audio and/or video technology in addition to stenographically

Production: You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 7/18/2022

CLERK OF COURT Signature of Clerk or Deputy Clerk

OR Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Front Sight Management LLC, who issues or requests this subpoena, are:

Steven T. Gubner, BG Law LLP, 300 S. 4th Street, Suite 1500, Las Vegas, NV 89101; sgubner@bg.law; (702) 835-0800

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day’s attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server’s signature

Printed name and title

Server’s address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT “4”

UNITED STATES BANKRUPTCY COURT

District of Nevada

In re Front Sight Management LLC
Debtor

Case No. 22-11824-abl

(Complete if issued in an adversary proceeding)

Chapter 11

Plaintiff
v.

Adv. Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Dianne Meacher
(Name of person to whom the subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit 1 attached hereto.

Table with 2 columns: PLACE (BG Law LLP, 300 4th Street, Suite 1500, Las Vegas, NV 89101 or electronically via DropBox or similar application) and DATE AND TIME (08/01/22 9:30 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: PLACE and DATE AND TIME

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/18/22

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Front Sight Management LLC, who issues or requests this subpoena, are:

Steven T. Gubner, BG Law LLP, 300 S. 4th Street, Suite 1500, Las Vegas, NV 89101; sgubner@bg.law; (702) 835-0800

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

1 **EXHIBIT 1 TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR**
2 **OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR**
3 **ADVERSARY PROCEEDING)**

4 **I.**

5 **INSTRUCTION AND PRELIMINARY STATEMENT**

6 The following instructions shall be considered to be applicable to all demands for production
7 of documents contained herein:

8 A. In producing documents and things, you are requested to furnish all documents
9 known or available to you, regardless of whether these documents are in your possession, custody or
10 control or are possessed by any subsidiary or affiliated entities, officers, directors, agents,
11 employees, representatives, investigators, or by your attorneys or their agents, employees,
12 representatives or investigators.

13 B. In producing documents, any comment, notation, or marking appearing on any
14 document and not a part of the original is to be considered a separate document, and any draft,
15 preliminary form or superseded version of any document is also to be considered a separate
16 document.

17 C. In producing documents, all documents should be produced in the same order as they
18 are kept or maintained.

19 D. In producing documents, all documents should be produced in the file, folder,
20 envelope or other container in which the documents are kept or maintained. If for any reason said
21 container cannot be produced, please produce copies of all labels or other identifying markings.

22 E. In producing documents, documents attached to each other must not be separated.

23 F. In producing documents, if you assert any privilege concerning the identification or
24 production of any of the documents described below, or if you object to the identification or
25 production of any such documents on any grounds, or if you for any reason contend that any of the
26 documents described below are not subject to discovery for any reason, then specify in detail in your
27 response, the precise grounds for the objection, privilege, or other contention which you make in this
28 regard, and describe in detail the document or documents as to which you assert this privilege,

1 objection or contention. Such description shall include a statement of the general nature of the
2 document, the name of each person who executed it, the name of each person who has received the
3 original or copies of it, the name of each person who has seen the original or any copies of it, the
4 name of each person with whom it was discussed, and a general description of the nature and
5 contents of the documents. Finally, you should identify and produce for inspection and copying all
6 documents which fit the description set forth below as to which you do not assert any such privilege,
7 objection or contention.

8 G. In producing documents, the words “and” and “or” shall be construed conjunctively
9 or disjunctively, whichever makes the request more inclusive. The term “any” includes the word
10 “all”; the term “all” includes the word “any.” The terms “all,” “each,” and “every” shall be
11 construed so as to make the request more inclusive.

12 **II.**

13 **DEFINITIONS**

14 1. The terms “YOU” and “YOUR” shall refer to Dianne Meacher, and any attorneys,
15 agents and/or representatives acting on your behalf.

16 2. “BFS” shall refer to Bankgroup Financial Services.

17 3. "COMMUNICATIONS" shall mean correspondence, telephone conversations,
18 voicemails, person-to-person conversations, memoranda, e-mails, text messages (including SMS and
19 MMS), voice messages, instant messages, direct messages (including any messages on any social
20 media platform or app), facsimiles, telegrams, press releases, announcements, audio and video
21 recordings and all other forms of communicating language or thought.

22 4. “CONSULTING AGREEMENT” shall refer to the Consulting Agreement between
23 BFS and the Debtor dated July 1, 2010, and any amendments thereto including the Supplemental
24 Agreement dated June 1, 2018.

25 5. “DEBTOR” shall refer to debtor Front Sight Management, LLC, its officers,
26 directors, managers, members, employees, agents and/or representatives acting on its behalf.

27 6. “DOCUMENTS” shall mean and refer to the definition of “writing” set forth in
28 Federal Rule of Evidence 1001, and includes the original and any non-identical duplicates, and both

1 sides thereof, no matter how produced, prepared, stored, recorded, reproduced or transmitted, of
2 handwriting, typewriting, printing, photographing, electronic mail (e-mail) and every other means of
3 recording upon any tangible thing, documents stored in electronic form, computerized records,
4 computer files and all other information capable of being retrieved from a computer, and any other
5 form of communication and representation, including letters, words, pictures, sounds, and symbols,
6 or combinations thereof, and including correspondence, letters and other communications.

7 7. "DIANNE'S EMPLOYMENT AGREEMENT" shall refer to the Employment
8 Agreement between YOU and the DEBTOR, dated as of July 7, 2010.

9 8. The phrase "POSSESSION, CUSTODY or CONTROL" applies to (a) a
10 DOCUMENT in YOUR physical custody; (b) a DOCUMENT that YOU own in whole or in part; (c)
11 a DOCUMENT that YOU have the right by contract, statute, or otherwise to use, inspect, examine,
12 or copy on any terms; (d) a DOCUMENT for which YOU have any understanding (express or
13 implied) that YOU may use, examine, or copy on any terms; or a DOCUMENT that YOU have, as a
14 practical matter, the ability to use, inspect, examine, or copy.

15 9. The term "PROPERTY" means and refers to that certain 550 acres of raw land in
16 Pahrump, Nevada, owned by the DEBTOR.

17 10. "REGARDING" shall mean, pertaining to, mentioning, discussing, including,
18 summarizing, describing, reflecting, containing, referring to, relating to, depicting, connected with,
19 embodying, evidencing, constituting, concerning, reporting, purporting or involving an act
20 occurrence, event, transaction, fact, thing or course of dealing.

21 11. "RELATING," "RELATED TO," "EVIDENCING," or "DEMONSTRATING" shall
22 mean supporting, refuting, undermining, constituting, pertaining to, in connection with, reflecting,
23 referring to, based upon, evidencing, demonstrating, stating or in any manner logically, factually,
24 indirectly or directly, or in any other way connecting to the matter addressed in the request.

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1 III.

2 **DOCUMENTS TO BE PRODUCED**

3 **REQUEST FOR PRODUCTION NO. 1:**

4 All DOCUMENTS RELATING to BFS and its formation.

5 **REQUEST FOR PRODUCTION NO. 2:**

6 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING all
7 employment agreements, including DIANNE’S EMPLOYMENT AGREEMENT, between YOU
8 and the DEBTOR, including any amendments and supplements thereto.

9 **REQUEST FOR PRODUCTION NO. 3:**

10 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
11 CONTROL REGARDING all employment agreements between YOU and the DEBTOR, including
12 any amendments and supplements thereto.

13 **REQUEST FOR PRODUCTION NO. 4:**

14 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING all
15 consulting agreements between YOU and the DEBTOR, including any amendments and
16 supplements thereto.

17 **REQUEST FOR PRODUCTION NO. 5:**

18 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
19 CONTROL REGARDING all consulting agreements between YOU and the DEBTOR, including
20 any amendments and supplements thereto.

21 **REQUEST FOR PRODUCTION NO. 6:**

22 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING the
23 CONSULTING AGREEMENT, including all amendments and supplements thereto.

24 **REQUEST FOR PRODUCTION NO. 7:**

25 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
26 CONTROL REGARDING the CONSULTING AGREEMENT.

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1 **REQUEST FOR PRODUCTION NO. 8:**

2 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING
3 any agreements and/or contracts between YOU and the DEBTOR, including any amendments and
4 supplements thereto.

5 **REQUEST FOR PRODUCTION NO. 9:**

6 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
7 CONTROL REGARDING any agreements and/or contracts between YOU and the DEBTOR,
8 including any amendments and supplements thereto.

9 **REQUEST FOR PRODUCTION NO. 10:**

10 All DOCUMENTS in YOUR POSSESSION, CUSTODY OR CONTROL REGARDING
11 any agreements and/or contracts between BFS and the DEBTOR, including any amendments and
12 supplements thereto.

13 **REQUEST FOR PRODUCTION NO. 11:**

14 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY OR
15 CONTROL REGARDING any agreements and/or contracts between BFS and the DEBTOR,
16 including any amendments and supplements thereto.

17 **REQUEST FOR PRODUCTION NO. 12:**

18 All UCC financing statements filed by YOU RELATED TO YOUR alleged security interest
19 in the DEBTOR'S personal property.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY or
22 CONTROL REGARDING any UCC financing statement filed by YOU RELATED TO YOUR
23 alleged security interest in the DEBTOR'S personal property.

24 **REQUEST FOR PRODUCTION NO. 14:**

25 All UCC financing statements filed by BFS RELATED TO its alleged security interest in the
26 DEBTOR'S personal property.

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1 **REQUEST FOR PRODUCTION NO. 15:**

2 All COMMUNICATIONS with the DEBTOR in YOUR POSSESSION, CUSTODY or
3 CONTROL REGARDING any UCC financing statement RELATED TO BFS' alleged security
4 interest in the DEBTOR'S personal property.

5 **REQUEST FOR PRODUCTION NO. 16:**

6 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING all
7 payments made to YOU by the DEBTOR, or on the DEBTOR'S behalf, on account of DIANNE'S
8 EMPLOYMENT AGREEMENT.

9 **REQUEST FOR PRODUCTION NO. 17:**

10 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
11 detailed accounting of YOUR alleged claim against the DEBTOR.

12 **REQUEST FOR PRODUCTION NO. 18:**

13 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL REGARDING a
14 detailed accounting of BFS' alleged claim against the DEBTOR.

15 **REQUEST FOR PRODUCTION NO. 19:**

16 All DOCUMENTS in YOUR POSSESSION, CUSTODY or CONTROL EVIDENCING the
17 work YOU performed for the DEBTOR under the CONSULTING AGREEMENT.

18 **REQUEST FOR PRODUCTION NO. 20:**

19 All COMMUNICATIONS in YOUR POSSESSION, CUSTODY or CONTROL
20 EVIDENCING the work YOU performed for the DEBTOR under the CONSULTING
21 AGREEMENT.

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CERTIFICATE OF SERVICE

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

On July 18, 2022, I served the following document:

NOTICE OF INTENT TO ISSUE SUBPOENAS

BY ELECTRONIC MAIL

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

- JASON BLUMBERG Jason.blumberg@usdoj.gov
- CHAPTER 11 - LV USTPRegion17.lv.ecf@usdoj.gov
- DAWN M. CICA dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- THOMAS H. FELL tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- STEVEN T GUBNER sgubner@bg.law, ecf@bg.law
- BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- NICOLE E. LOVELOCK nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- EDWARD M. MCDONALD edward.m.mcdonald@usdoj.gov
- TRACY M. O'STEEN tosteen@carlyoncica.com, crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com
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- JESSICA S. WELLINGTON jwellington@bg.law

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

Executed July 18, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY