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12 Attorneys for Chapter 11 Debtor
 13 and Debtor in Possession

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

16 In re:

17 Front Sight Management LLC,

18 Debtor.

19 Case No. 22-11824-abl

20 Chapter 11

21 **Hearing Date:** September 30, 2022

22 **Hearing Time:** 9:30 a.m.

23 **DEBTOR’S APPLICATION TO EMPLOY GREENBERG TRAUIG, LLP AS**
 24 **SPECIAL COUNSEL PURSUANT TO 11 U.S.C. §§ 327(e), 328 AND 330**
 25 **EFFECTIVE AS OF AUGUST 5, 2022**

26 Front Sight Management LLC dba Front Sight Firearms Training Institute, the chapter 11
 27 debtor and debtor in possession herein (the “Debtor”), hereby files this application (“Application”)
 28 for entry of an order pursuant to Sections 327(e), 328 and 330 of 11 U.S.C. §§ 101 *et seq.* (the
 “Bankruptcy Code”) and Rule 2016(a) of the Federal Rules of Bankruptcy Procedure (the
 “Bankruptcy Rules”) authorizing the Debtor to retain and employ Greenberg Traurig, LLP (“GT”) as
 special counsel effective as of August 5, 2022. In support of the Application, the Debtor respectfully
 represents as follows:

I.

JURISDICTION AND VENUE

1
2
3 1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and
4 1334. This Application is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A).

5 2. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

6 3. The statutory basis for the relief requested herein are Sections 105(a), 327(e), 328,
7 330, 1107 and 1108 of the Bankruptcy Code; Bankruptcy Rules 2014, 2016 and 5002, and the Guide
8 to Applications for Retainers, and Professional and Insider Compensation issued from the Office of
9 the United States Trustee (revised April 2008) (“Compensation Guide”).

10 II.

STATEMENT OF FACTS

11
12 4. On May 24, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief
13 under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtor
14 continues to operate its business and manage its affairs as a debtor in possession pursuant to Sections
15 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the
16 Debtor’s chapter 11 case. On June 9, 2022, the Official Committee of Unsecured Creditors was
17 appointed by the Office of the United States Trustee pursuant to Section 1102 of the Bankruptcy
18 Code.

19 5. The Debtor was originally formed as a California business and operated near
20 Bakersfield, California from its formation in 1996 until 2002. In 1998, the Debtor purchased real
21 property located at 1 Front Sight Road, Pahrump, Nevada 89061 (the “Front Sight Property”) and
22 began building what is now the finest and largest private firearms training facility in the world.

23 6. The Front Sight Property is accessed by a four-mile, two lane paved road, and is
24 currently comprised of 50 outdoor firearms training ranges, live fire tactical training simulators, an
25 8,000 square foot classroom and pro shop, and assorted accessory buildings, bathrooms, three water
26 wells and thousands of square yards of completed grading for future development (the “Front Sight
27 Firearms Facility”).

28 7. The Debtor provides firearms training courses which promote the defensive use of

1 various firearms. Courses are offered to the general public, members of law enforcement and
2 military members. The Front Sight Firearms Facility is the most successful of its type in the United
3 States. The Debtor provides classes and instruction annually to upward of 40,000 gun and weapons
4 enthusiasts. The Debtor is considered the leader in its field and provides additional training and
5 instruction for numerous city and state agencies seeking to improve performance of their respective
6 law enforcement departments. Over the last 25 years, the Debtor has trained a million students and
7 currently has over 263,000 members.

8 8. Historically, the Debtor has operated its business by selling lifetime memberships,
9 courses and ancillary products. The Debtor's business model centered around a major expansion
10 plan that was intended to build the Front Sight Vacation Club & Resort (vacation residences, a RV
11 park, etc.), a retail area adjacent to the vacation club and a pavilion. The Debtor's intent was that the
12 discounted lifetime memberships and other promotional benefits (like "Front Sight bucks" [money to
13 be used on limited items at Front Sight], certificates [to be used for 2 day or 4-day training courses],
14 etc.) would lead to a "captive" customer base that would be more likely to take advantage of the
15 Vacation Club & Resort which would then bring increased revenue to the Debtor.

16 9. Postpetition, the Debtor requires legal assistance to review the Debtor's historical
17 practices and structure membership agreements such that they comport with the Debtor's
18 reorganization efforts, as specifically described below.

19 III.

20 **RELIEF REQUESTED**

21 10. Through reorganization, the Debtor intends on honoring prepetition memberships
22 subject to terms and conditions that will be set forth more fully in the Debtor's soon to be filed
23 amended disclosure statement and plan. Thus, the Debtor requires the assistance of legal counsel
24 who has experience in structuring membership programs in the bankruptcy context to develop and
25 draft membership agreement templates, and related documentation.

26 11. GT is a full-service firm with significant expertise structuring private residence and
27 fractional membership programs, marina slip membership programs, resort membership programs,
28 community based and stand-alone golf and country club membership programs in the United States,

1 Canada, the Caribbean and Mexico. Additionally, GT has significant experience structuring
2 membership programs in the context of business reorganizations under chapter 11 of the Bankruptcy
3 Code.

4 12. By this Application, the Debtor seeks authority from this Court to employ GT as
5 special counsel to provide legal advice and assistance related to developing a membership plan and
6 drafting membership agreement templates, and related documentation. The Debtor seeks to employ
7 at the expense of its estate and to have its employment of GT be deemed effective as of August 5,
8 2022. Such representation shall be subject to the Engagement Agreement, as described more fully
9 below, which sets forth the terms of such representation as well as the applicable reimbursement
10 policies in accordance with GT's standard practices.

11 13. The Debtor has selected GT based on its extensive experience in structuring and
12 developing membership programs in the context of business reorganizations under chapter 11 of the
13 Bankruptcy Code. The Debtor believes that the employment of GT will be in the best interests of
14 the Debtor and its estate.

15 14. A copy of GT's statement of qualifications, which includes certain summaries of the
16 background, education, and professional experience for Jim Mace and Mark Hillier, the attorneys
17 primarily handling this matter, is attached hereto as **Exhibit A**. As shown therein, GT and its
18 attorneys are experienced in developing and structuring membership programs in various
19 jurisdictions. GT is well qualified to review the Debtor's historical practices and structure
20 membership agreements such that they comport with the Debtor's reorganization efforts.

21 IV.

22 SCOPE OF SERVICES

23 15. The Debtor retained (subject to Court approval) GT on or about August 5, 2022 (the
24 "Retention Date"). A copy of the Engagement Agreement dated August 5, 2022, entered into
25 between the Debtor and GT is attached to the concurrently filed Declaration of Jim Mace as **Exhibit**
26 **1**. GT did not receive a retainer from the Debtor.

27 16. The Debtor seeks to employ GT as special counsel to provide legal advice and
28 assistance related to developing a membership plan and drafting membership agreement templates,

1 and related documentation. In light of GT's expertise in this area, GT is well-qualified to perform
2 the requested services and assist the Debtor in the capacity outlined herein.

3 17. GT will use reasonable efforts to coordinate with the Debtor's other professionals to
4 avoid unnecessary duplication of services.

5 18. GT has stated its willingness to act as the Debtor's special counsel during the
6 pendency of this chapter 11 case.

7 19. The scope of GT's services may be modified from time to time, provided that GT and
8 the Debtor mutually agree in writing to any such modification and corresponding change in the fee
9 structure subject to further Court approval.

10 **V.**

11 **COMPENSATION**

12 20. As set forth in the Engagement Agreement, staff and professionals at GT will be
13 billed at hourly rates subject to approval by this court pursuant to Sections 330 and 331 of the
14 Bankruptcy Code. The rates charged by GT are reasonable and customary in the community and
15 comparable to the rates charged by other law firms in Las Vegas with respect to structuring
16 membership programs. As is the case with respect to rates charged in non-bankruptcy matter, GT's
17 rates are subject to periodic adjustment to reflect economic and other conditions. GT's current
18 hourly rates applicable to the principal attorneys proposed to be engaged in this matter are:

19

Professional	Per Hour (USD)
Jim Mace	\$835
Mark Hillier	\$700

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23

24 21. Other attorneys and paraprofessionals will render services to the Debtor, as needed.
25 Generally, GT's hourly rates for Shareholders range from \$510-\$775; Of Counsel, hourly rates range
26 from \$485-\$590; for Associates, hourly rates range from \$325-\$450; and for Paralegals, hourly rates
27 range from \$250-\$295.

28 22. GT has not shared, nor agreed to share, (a) any compensation it may receive with any

1 other party or person, other than with shareholders, counsel, associates and employees of GT, or (b)
2 any compensation another person or party has received or may receive.

3 23. In addition to the hourly rate, the Debtor will reimburse GT for all reasonable, out-of-
4 expenses incurred in connection with this chapter 11 case, including but not limited to telephone,
5 overnight mail, messenger, travel, meals, accommodations, and other expenses specifically related to
6 the engagement.

7 24. GT will seek compensation for its fees and expenses incurred on behalf of the Debtor,
8 consistent with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the United States
9 Trustee Guidelines, and any applicable rules or orders of this Court, from the Debtor's estate.

10 25. GT shall be considered a Professional as that term is defined the *Order Establishing*
11 *Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals*
12 [ECF No. 318] (the "Procedures Order"). GT will comply with the procedures set forth in the
13 Procedures Order regarding monthly payment of compensation and reimbursement of expenses. GT
14 agrees that its billing and reimbursement requests shall be subject to all applicable rules under the
15 Bankruptcy Code, the Bankruptcy Rules and the Local Rules, and the Engagement Agreement shall
16 be modified as may be necessary to comply with any and all such limitations provided in those rules
17 and regulations.

18 26. The Debtor respectfully submits that the fee arrangement with GT, as set forth above
19 and in the Engagement Agreement, is reasonable in light of: (i) industry practice and similar market
20 rates both in and out of chapter 11 proceedings; (ii) GT's experience structuring membership
21 programs; and (iii) work to be performed pursuant to its retention. The Debtor believes that, given
22 the nature of the legal services to be provided by GT, the proposed compensation arrangement is
23 both fair and reasonable.

24 VI.

25 **NO ADVERSE INTEREST**

26 27. Pursuant to Section 327(e) of the Bankruptcy Code, a debtor may employ an attorney
27 "for a specified special purpose, other than to represent the [debtor] in conducting the case, . . . if in
28

1 the best interest of the estate, and if such attorney does not represent or hold any interest adverse to
2 the debtor or to the estate with respect to the matter on which such attorney is to be employed.”

3 28. Here, the Debtor requests to employ GT for the specified purpose of assisting the
4 Debtor with developing a membership plan and drafting membership agreement templates, and
5 related documentation. Such retention is in the best interest of the estate because GT has the
6 necessary qualifications and expertise necessary to assist the Debtor with developing a post-
7 confirmation membership program.

8 29. The Debtor has disclosed to GT the individuals of which it is aware that constitute
9 members, creditors, potential creditors, and other parties-in-interest to determine any prior or present
10 representation of any creditors or parties-in-interest. *See* Mace Decl. Based on its review of the
11 information provided by Debtor, GT believes that neither it nor any of its principals or associates
12 have any present or prior connection with the Debtor, the Debtor’s creditors, or other parties-in-
13 interest, except as set forth in detail in the Mace Declaration.

14 30. To the best of Mr. Mace’s knowledge, GT and its principals and associates do not
15 hold or represent any interest adverse to Debtor’s estate, and GT and its shareholders and employees
16 are disinterested persons within the meaning of Sections 101(14) and 327 of the Bankruptcy Code,
17 as modified by Section 1107(b). Additionally, neither GT nor any of its shareholders or employees
18 have any connection with the Office of the United States Trustee or any persons employed in the
19 Office of the United States Trustee. GT’s representation of Debtor will not be adverse to Debtor’s
20 estate.

21 31. None of the principals or employees of GT have ever served as an officer or director
22 of the Debtor. GT is not an equity security holder of the Debtor and has never received
23 compensation for any services normally attributed to an officer or director of the Debtor.

24 32. GT will conduct an ongoing review of its files to ensure that no disqualifying
25 circumstances arise, and if any new relevant facts or relationships are discovered, it will supplement
26 its disclosure to the Court.


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VII.

CONCLUSION

The Debtor respectfully requests entry of an order in substantially the form attached hereto as **Exhibit B** authorizing the employment of GT as special counsel effective as of August 5, 2022, and granting the Debtor such other and further relief as is just and proper

Dated: August 26, 2022



Ignatius Piazza
Manger of Front Sight Management LLC,
Chapter 11 Debtor and Debtor in Possession

Submitted by:

BG LAW LLP

By: /s/ Jessica S. Wellington

Steven T. Gubner

Susan K. Seflin

Jessica S. Wellington

Attorneys for Front Sight Management LLC,

Chapter 11 Debtor in Possession

EXHIBIT A



Our Team



Jim Mace

SHAREHOLDER

Jim.Mace@gtlaw.com

LAS VEGAS

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Las Vegas, NV 89135
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ORLANDO

450 South Orange Avenue
Suite 650
Orlando, FL 32801

Real Estate | Real Estate Finance | Hospitality | Land Use

Jim Mace, Managing Shareholder of the firm's Las Vegas office, focuses his practice in the development, acquisition and disposition of virtually all asset classes of real estate. He represents private equity funds, developers and other investors and operators in the acquisition, financing, development, sale and leasing of commercial properties, including mixed use projects, resort hotels, retail assets, multi-family projects, timeshare developments, condominium properties, golf courses and strategic land sites.

Concentrations

- Acquisition, development, financing and operation of real estate projects of all types
- Design, structure, regulatory compliance and financing for mixed use, timeshare, condominium, retail and resort hotel projects
- Land use and the development regulatory process

Experience

Acquisitions

- Represented Crestview Partners in connection with the acquisition of Emerald EMS, an electronics manufacturing services provider specializing in high-mix, low-volume engineering, design, prototyping, testing, assembly and lifecycle support services for blue-chip original equipment manufacturers across a range of end markets.
- Represented Blackstone Real Estate Income Trust (BREIT) in a BREIT-led joint venture with MGM Growth Properties LLC to acquire the Las Vegas real estate assets of MGM Grand and Mandalay Bay for \$4.6 billion.
- Represented Blackstone Real Estate Income Trust (BREIT) in a BREIT-led joint venture with MGM Resorts International to acquire the real estate assets of the Bellagio for \$4.25 billion in a sale-leaseback transaction.
- Represented Black Dragon Capital in connection with its acquisition of Grass Valley, a leading technology supplier of advanced broadcast and media solutions, with operations in over 20 different jurisdictions worldwide.
- Represented an affiliate of Centre Partners in connection with its acquisition of Boomerang Laboratories, Inc., a manufacturer of liquid products for personal care, household and pharmaceutical use.
- Represented Blue Wolf Capital Partners, LLC in connection with its acquisition of Kirlin Design Build LLC, one of the country's leading engineering and construction companies, focused on large, complex federal and private sector projects.
- Represented Centre Partners in connection with its sale of Stonewall Kitchen, a leading manufacturer of premium branded specialty food and gift products, including jams, olive oils, bottled sauces, crackers and pancake mixes.
- Represented Blue Wolf Capital Partners, LLC in connection with its acquisition of RHA Health Services, a leading provider of community-based health services focused on individuals with intellectual and developmental disabilities, behavioral health needs and substance use challenges.
- Represented WeWork in connection with its acquisition of Emprenurban, a Latin American-based real estate development and construction company.
- Represented Orange Lake Holdings, LLP with the acquisition of Silverleaf Resorts, Inc. from an affiliate of Cerberus Capital Management, L.P. Orange Lake Holdings, LLP is home to the Holiday Inn Club Vacations brand.
- Represented several gaming companies in the acquisition and disposition of hotel-casinos.

Development

- Represented the developer of casino-hotel, condominium, condominium hotel and retail exceeding \$8 billion in cost.
- Represented the developer of a casino-hotel, condominium hotel and retail development exceeding \$3 billion in cost.
- Represented various developers of condominium hotels exceeding \$3 billion in cost.
- Represented the developer of a condominium project exceeding \$800 million in cost.
- Represented the developer of an approximate 100-acre lifestyle retail project.

Military Experience

- Served, U.S. Army, 82nd Military Police Company, 82nd Airborne Division

Recognition & Leadership

Awards & Accolades

- Listed, *The Best Lawyers in America*, Real Estate Law; Land Use and Zoning Law, 2006-2023
- Listed, *Chambers USA Guide*, 2002-2022
- Team Member, *Chambers & Partners USA* Real Estate Law Firm of the Year, 2013, 2017-2018, and 2022
- Listed, *VEGAS INC*, "Top Lawyers," Real Estate, 2013, 2021
- Team Member, a *Law360* "Hospitality Practice Group of the Year," 2018, 2020, and 2021
- Listed, *Super Lawyers* magazine, *Mountain States Super Lawyers*, 2005-2019
- Team Member, a U.S. News - Best Lawyers®, "Law Firm of the Year" in Real Estate Law, 2015
- Team Member, *The Legal 500 United States*, "Top Tier" Firm in Real Estate, 2013 and 2014
- Team Member, a *Law360* "Real Estate Practice Group of the Year," 2012-2013 and 2015
- Rated, AV Preeminent® 5.0 out of 5.0

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Professional & Community Involvement

- Court Appointed Special Advocate (CASA) Clark County, Nevada District Court, Family Division
- Trustee Member, American Resort Development Association (ARDA)
- Board Member, Child Focus, Inc.
- Board Member, St. Jude's Ranch for Children
- Member, Clark County Bar Association
- Member, The Florida Bar
- Member, New York State Bar
- Member, State Bar of Nevada

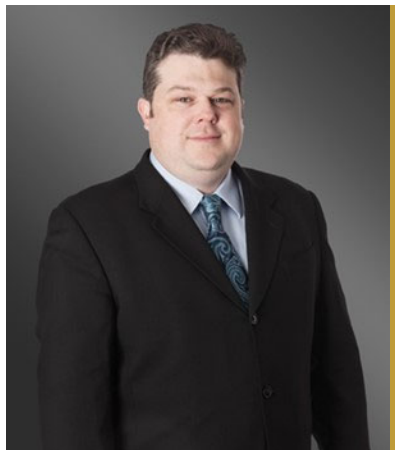
Credentials

Education

- J.D., *cum laude*, Syracuse University College of Law, 1983
- B.A., State University of New York at Buffalo, 1981

Admissions

- Nevada
- Florida
- New York



Mark D. Hillier

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Suite 300 East
West Palm Beach, FL 33401
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Real Estate | Hospitality | American Indian Law

Mark D. Hillier has worked in several architectural, land planning, legal, and consulting firms in the Recreational and Hospitality Practice since 1992. Mark is experienced in the areas of recreation and hospitality law, corporate, real estate, timeshare, infrastructure, securities, and taxation and has been active in events of the Urban Land Institute (ULI) Southeastern/Caribbean Council and the national ULI. Mark also has experience in structuring private residence and fractional membership programs, infrastructure cost recovery programs, conservation easements, marina slip membership programs, resort membership programs, community based and stand-alone golf and country club membership programs in the United States, Canada, the Caribbean and Mexico.

Concentrations

- Recreation and hospitality law
- Corporate law
- Real estate
- Securities
- Taxation
- Land development

Experience

Representative Matters

- Represented land developers, amenity owners and member groups in structuring club membership programs including:
 - Formulating new specialized stand-alone clubs (such as International Polo Club Palm Beach in Florida and The Shoals Club in North Carolina)
 - Restructuring existing golf, country and resort clubs to fund amenity expansions and renovations and increase cash flow (The Club at PGA West in California, Dorado Beach in Puerto Rico, Muirfield Golf Club in Ohio and Royal Palm Yacht & Country Club in Florida)



- Structuring community-based private, semi-private, and resort clubs to accelerate residence and homesite absorption (Timberline Golf Club in Alabama, The Grand Golf Club in California and Shooting Star in Wyoming)
- Designing and documenting slip membership programs that enabled marina owners to capitalize on marina investments (Sunset Harbour Yacht Club in Florida)
- Researched Do-Not-Call legislation and prepared club marketing strategy that incorporated new telephone contact restrictions.
- Represented land developers and amenity owners in negotiating amenity access agreements and hotel management agreements.
- Represented land developers and amenity owners in designing Founder Membership Programs to fund facilities construction.
- Represented land developers and resort owners in registering projects with land sales and timeshare regulators.
- Represented land developers in structuring conservation easements.

Internships

- Intern, Victor S. Johnson III, District Attorney General, Nashville, TN, 1998-1999
- Intern, Congresswoman Ileana Ros-Lehtinen, Washington, D.C., 1996-1997

Recognition & Leadership

Awards & Accolades

- Team Member, a *Law360* "Hospitality Practice Group of the Year," 2021
- Team Member, *Chambers USA* Award for Excellence, Real Estate, 2010 and 2017-2018
- Team Member, a U.S. News - Best Lawyers®, "Law Firm of the Year" in Real Estate Law, 2015
- Team Member, *The Legal 500 United States*, "Top Tier" Firm in Real Estate, 2013 and 2014
- Team Member, a *Law360* "Real Estate Practice Group of the Year," 2011-2013 and 2015

Professional & Community Involvement

- Full Member, Urban Land Institute, 2000-Present
 - Southeast Florida and Caribbean District Council, Executive Committee, 2004-Present
 - Chair, Young Leaders Group Committee, 2003-2004
 - Recreational Development Council, Red Flight, 2003-Present
- Member, American Bar Association, 2000-Present
- Member, Phi Delta Phi Legal Fraternity, 1998-Present

Credentials

Education

- J.D., Vanderbilt University Law School, 2000
 - President, The Federalist Society
 - President, Criminal Law Society
 - Member, Business Law Society
 - Member, Entertainment Law Society
- B.A., American University, 1997

Admissions

- Florida

Languages

- Spanish

EXHIBIT B

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Attorneys for Chapter 11 Debtor
and Debtor in Possession

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

In re:

Front Sight Management LLC,

Debtor.

Case No. 22-11824-abl

Chapter 11

Hearing Date: September 30, 2022
Hearing Time: 9:30 a.m.

**[PROPOSED] ORDER GRANTING DEBTOR’S APPLICATION
TO EMPLOY GREENBERG TRAURIG, LLP AS SPECIAL
COUNSEL PURSUANT TO 11 U.S.C. §§ 327(e), 328 AND 330
EFFECTIVE AS OF AUGUST 5, 2022**

On September 30, 2022 at 9:30 a.m., a hearing was held before the Honorable August Landis, Chief United States Bankruptcy Judge for District of Nevada, for the Court to consider the application (“Application”) filed by Front Sight Management LLC, the chapter 11 debtor in possession herein (the “Debtor”), to employ Greenberg Traurig, LLP (“GT”) as special counsel

1 pursuant to 11 U.S.C. §§ 327(e), 328 and 330 effective as of August 5, 2022. Appearances were as
2 duly noted on the record at the hearing.¹

3 The Court, having read and considered the Application and all evidence filed in support of
4 the Application including the Declaration of Jim Mace; the Court having considered the argument
5 and representations of counsel at the hearing and other matters which the Court may properly take
6 judicial notice, including, without limitation, the record in this case as reflected on the docket; the
7 Court having set forth its findings and conclusions on the record pursuant to Rule 52 of the Federal
8 Rules of Civil Procedure and Rule 7052 of the Federal Rules of Bankruptcy Procedure; the Court
9 having found that notice of the Application was sufficient under the circumstances and no other or
10 further notice is required; the Court having determined that the legal and factual bases set forth in the
11 Application establish just cause for the relief sought therein; and after due deliberation and sufficient
12 cause appearing therefor,

13 **IT IS HEREBY ORDERED AS FOLLOWS:**

14 1. The Application is GRANTED in its entirety.

15 2. Pursuant to 11 U.S.C. §§ 327(e), 328 and Rule 2014 of the Federal Rules of
16 Bankruptcy Procedure, the Debtor is authorized to retain and employ GT effective August 5, 2022,
17 as special counsel to perform the services set forth in the Application and under the terms of the
18 Engagement Agreement attached as Exhibit 1 to the Declaration of Jim Mace.

19 3. GT shall be compensated from the Debtor's estate in accordance with the procedures
20 set forth in the Application, 11 U.S.C. §§ 330 and 331, the Bankruptcy Rules, the Local Bankruptcy
21 Rules and Orders of this Court.

22 4. The Court shall retain jurisdiction to hear and determine all matters arising from the
23 implementation of this Order.

24 **IT IS SO ORDERED.**

25 **[Remainder of Page Intentionally Blank]**

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28 ¹ Any capitalized term that is not set forth in this Order has the same meaning as set forth in the Application.

1 Submitted by:
2 BG Law LLP

3 By: /s/ Jessica S. Wellington
4 Steven T. Gubner
5 Susan K. Seflin
6 Jessica S. Wellington

7 Attorneys for Chapter 11
8 Debtor and Debtor in Possession
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