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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

FRONT SIGHT MANAGEMENT LLC,

Debtor.

Case No. 22-11824-abl

Chapter 11

Hearing Date: October 24, 2022
Hearing Time: 9:30 a.m.

**FIRST INTERIM FEE APPLICATION OF KELLEY DRYE & WARREN LLP
FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED AS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF FRONT SIGHT MANAGEMENT LLC FOR
THE PERIOD FROM JUNE 13, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

Pursuant to section 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of Nevada (the “Local Rules”), and the *Order Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals* (the “Interim Compensation Order”),¹ Kelley Drye & Warren LLP (“Kelley Drye”), as primary counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Front Sight Management LLC, the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby submits this first interim fee application (the “Application”) seeking entry of an order granting it interim allowance

¹ Docket No. 318.

1 and approval of \$484,299.50 in fees and \$875.87 in expenses incurred during the period from
2 June 13, 2022 through and including August 31, 2022 (the “Application Period”).

3 This Application is made and based upon the following Memorandum of Points
4 and Authorities, the declarations of Robert L. LeHane (the “LeHane Declaration”) and Mark
5 Eagleton (the “Eagleton Declaration”), filed concurrently herewith, the papers and pleadings on file
6 herein, judicial notice of which is respectfully requested, and any argument of counsel at the time
7 of hearing on the Application.

8 **I. SUMMARY OF REQUESTED RELIEF AND EVIDENCE**

9 1. This Application has been prepared in accordance with the United States
10 Trustee’s *Guidelines for Reviewing Applications for Compensation and Reimbursement of*
11 *Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee
12 Guidelines”), as well as in accordance with Bankruptcy Rule 2016 and Local Rule 2016. This is
13 Kelley Drye’s first interim application for allowance of compensation and reimbursement of
14 expenses in the Debtor’s chapter 11 case. Kelley Drye seeks current payment of 100% of its fees
15 and expenses relating to services rendered during the Application Period, subject in all respects to
16 limitations set forth in the *Final Order: (I) Authorizing Debtor to Obtain Post-Petition Financing,*
17 *(II) Granting Liens and Administrative Expense Claims, (III) Authorizing Debtor’s Use of Cash*
18 *Collateral, (IV) Modifying the Automatic Stay, and (V) Granting Other Related Relief*
19 (the “DIP Order”).²

20 2. This Application sets forth the fees and expenses Kelley Drye incurred as
21 primary counsel to the Committee during the Application Period. Kelley Drye requests allowance
22 of compensation in the amount of \$484,299.50 and reimbursement of expenses in the amount of
23 \$875.87 for a total of \$485,175.37 for services rendered during the Application Period.

24 3. **Exhibit 1** provides a summary of compensation by project category for the
25 Application Period.

26 4. **Exhibit 2** provides itemized time records of the attorneys and
27 paraprofessionals that have rendered services to the Committee during the Application Period.

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² Docket No. 228.

1 5. **Exhibit 3** is a summary of fees by professional. This summary sets forth
2 the total fees incurred by each timekeeper that worked on this case and sets forth each
3 professional’s hourly rate and the total amount billed by the professional during the Application
4 Period. This summary also discloses the customary and comparable compensation required by the
5 U.S. Trustee Guidelines.

6 6. **Exhibit 4** summarizes the actual and necessary expenses that Kelley Drye
7 incurred during the Application Period.

8 **II. JURISDICTION AND VENUE**

9 7. This Court has jurisdiction over this Application pursuant to
10 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (B).

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

12 9. Pursuant to Local Rule 7014.2, Kelley Drye consents to entry of final
13 order(s) or judgment(s) by the bankruptcy judge if it is determined that the bankruptcy judge,
14 absent consent of the parties, cannot enter final orders for judgment consistent with Article III of
15 the United States Constitution.

16 **III. BACKGROUND**

17 10. On May 24, 2022 (the “Petition Date”), the Debtor filed a voluntary petition
18 for relief under chapter 11 of the Bankruptcy Code with this Court. Since the Petition Date, the
19 Debtor has remained in possession of its assets and has continued to operate and manage its
20 business as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

21 11. On June 9, 2022, the Office of the United States Trustee for Region 17
22 appointed a five-member Committee consisting of: (i) Steven M. Huen; (ii) Gary Cecchi;
23 (iii) David Streck; (iv) Thomas E. Donaghy; and (v) ALM Investments LLC.³ The Committee
24 selected Kelley Drye as its lead counsel and Carlyon Cica Chtd. (“Carlyon Cica”) as Nevada
25 counsel. The Committee also selected Dundon Advisers, LLC (“Dundon”) as its financial advisor.

26 12. On July 1, 2022, Kelley Drye filed the *Application for Order Authorizing*
27 *the Employment and Retention of Kelley Drye & Warren LLP as Lead Counsel for the Official*

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³ Docket No. 116.

1 *Committee of Unsecured Creditors Effective as of June 13, 2022* (the “Retention Application”).⁴

2 The Court entered an order approving the Retention Application on July 29, 2022.⁵

3 **IV. SERVICES RENDERED DURING THE APPLICATION PERIOD**

4 13. Kelley Drye rendered the following professional legal services to the
5 Committee during the Application Period:

- 6 a. Analyze the Debtor’s motion to approve DIP financing and related
7 budget, confer with the Debtor regarding same and draft an
8 opposition to Debtor’s motion to approve DIP financing and
9 response to LVDF’s opposition to same, including related research;
- 10 b. Confer with the Debtor and FS DIP regarding the Committee’s
11 concerns with the DIP financing, including providing comments to
12 various iterations of the proposed final DIP order to address the
13 Committee’s concerns and ultimate DIP settlement;
- 14 c. Analyze Las Vegas Development Fund’s (“LVDF”) motions to
15 appoint an examiner, remand the LVDF litigation to state court and
16 to modify the automatic stay, and conduct related research;
- 17 d. Draft oppositions to each of LVDF’s motions to appoint an
18 examiner, remand the LVDF litigation to state court and to modify
19 the automatic stay based on research conducted, which motions
20 were each overruled;
- 21 e. Research and draft the motion of the Committee to intervene in the
22 LVDF adversary proceeding, which was granted by the Court;
- 23 f. Research regarding the history of the Debtor’s litigation with LVDF,
24 including the underlying claims asserted and whether such claims
25 are property of the Debtor’s estate;
- 26 g. Analyze the Debtor’s initial plan and disclosure statement and
27 confer internally, as well as with Debtor, regarding the Committee’s
28 issues and concerns with same;
- h. Commence the Committee’s investigation into the Debtor’s
prepetition conduct and transactions involving Dr. Piazza;
- i. Regularly confer with the Debtor’s advisors regarding case status
and pending matters;
- j. Prepare for, and attend, the contested June 24 and July 25 hearings,
as well as the June 27 second-day hearing; and
- k. Conduct meetings and provide email updates to the Committee
regarding the general status of the case, the Debtor’s business
operations, pleadings filed, and Kelley Drye’s ongoing negotiations

4 Docket No. 233.

5 Docket No. 302.

1 with the Debtor on various case matters.

2 14. To assist the Court in its review of the fees requested in this Application,
3 Kelley Drye has divided its time entries into the project categories set forth below.

4 **Case Administration** (Fees: \$30,043.50 – Hours: 36.5)

5 15. This category represents time spent by Kelley Drye addressing general and
6 administrative matters attendant to the commencement and initial stages of this case. During the
7 Application Period, Kelley Drye drafted bylaws to govern Committee conduct, an initial critical
8 dates chart and task list regarding immediate matters to address. In connection therewith, Kelley
9 Drye regularly conferred internally, as well as with Carlyon Cica and Dundon, regarding case
10 strategy and work streams. Kelley Drye, in coordination with Carlyon Cica, also prepared the
11 necessary *pro hac vice* motions and local counsel designations and reviewed the Local Rules with
12 respect to same.

13 **Pleadings Review** (Fees: \$19,218.00 – Hours: 26.6)

14 16. This category represents time spent by Kelley Drye monitoring the docket
15 and conducting initial reviews of relevant pleadings filed in this case, including the numerous and
16 voluminous pleadings filed by LVDF in the main case and in the LVDF adversary proceeding.

17 **Retention Matters (Applications & Objections)** (Fees: \$27,575.00 – Hours: 36.0)

18 17. This category represents time spent by Kelley Drye attendant to all matters
19 regarding the retention of professionals in this case. During the Application Period, Kelley Drye
20 prepared its retention application and incorporated comments received from the U.S. Trustee.
21 Kelley Drye also review and provided comments to Dundon’s retention application. Also during
22 the Application Period, Kelley Drye analyzed the proposed retentions of the Debtor’s professionals
23 and conferred internally regarding same.

24 **Fee Matters (Applications & Orders)** (Fees: \$15,138.50 – Hours: 19.3)

25 18. This category represents time spent by Kelley Drye preparing its first
26 monthly fee statement for the period from June 13, 2022 through and including July 30, 2022.
27 Kelley Drye also reviewed and provided comments to Dundon’s first monthly fee statement, as
28 well as reviewed the monthly fee statements submitted by other professionals in this case. Also

1 during the Application Period, Kelley Drye reviewed the motion to approve interim compensation
2 procedures and LVDF's objection to same.

3 **Financing and Cash Collateral** (Fees: \$57,390.00 – Hours: 64.3)

4 19. This category represents time spent by Kelley Drye related to the Debtor's
5 motion to approve DIP financing. During the Application Period, Kelley Drye analyzed the
6 motion and related proposed budget and conferred internally, as well as with Dundon, regarding
7 its concerns with same. Kelley Drye conducted research regarding its DIP concerns and prepared
8 a combined response to LVDF's DIP objection and limited objection to the DIP financing. Kelley
9 Drye engaged in negotiations with the Debtor and FS DIP regarding the Committee's concerns.
10 The Committee ultimately reached an agreement on its DIP financing issues with the Debtor and
11 DIP lender. Kelley Drye reviewed and provided comments to multiple iterations of the proposed
12 final DIP order to incorporate the settlement.

13 **Asset Analysis Recovery and Disposition** (Fees: \$720.00 – Hours: 0.8)

14 20. This category represents time spent by Kelley Drye related to the disposition
15 and recovery of the Debtor's assets. During the Application Period, Kelley Drye conferred with
16 FS DIP regarding the prospect of a sale of the Debtor's assets.

17 **Claims Administration, Analysis & Objection** (Fees: \$11,304.00 – Hours: 12.6)

18 21. This category represents time spent by Kelley Drye related to the analysis
19 of claims against the Debtor's estate. During the Application Period, Kelley Drye conducted an
20 initial review of the proofs of claim filed against the Debtor and corresponded with LVDF and the
21 Debtor regarding same.

22 **Disclosure Statement & Plan** (Fees: \$28,519.00 – Hours: 31.9)

23 22. This category represents time spent by Kelley Drye related to the Debtor's
24 disclosure statement and Plan. During the Application Period, Kelley Drye analyzed and reviewed
25 the Debtor's initial disclosure statement and plan, the plan related documents, including financial
26 projections and liquidation analyses, and conferred internally, with the Debtor and Dundon
27 regarding same. The issues Kelley Drye analyzed with respect to the Debtor's disclosure statement
28 and plan included timing, solicitation, voting and claims calculation.

1 **Committee and Creditor Communications** (Fees: \$74,765.00 – Hours: 84.7)

2 23. This category represents time spent by Kelley Drye preparing for and
3 conducting regular Committee meetings as well as communicating with Committee members on
4 an individual basis from time to time regarding this case. During the Application Period, Kelley
5 Drye conducted routine telephonic meetings with the Committee to discuss general case status and
6 pending case matters, including the Debtor’s DIP financing, the LVDF litigation and the Debtor’s
7 initial disclosure statement and plan. Kelley Drye also prepared regular emails updating the
8 Committee on case developments, including recently filed pleadings and recommendations
9 regarding same.

10 **Business Operations** (Fees: \$2,692.50 – Hours: 3.0)

11 24. This category represents time spent by Kelley Drye analyzing the Debtor’s
12 business operations. During the Application Period, Kelley Drye analyzed the Debtor’s cash
13 management motion, including providing comments on the proposed final order. Kelley Drye also
14 conferred with Dundon regarding the Debtor’s financial affairs, its assets and liabilities, and the
15 Debtor’s monthly operating reports.

16 **Court Hearings** (Fees: \$53,936.00 – Hours: 65.3)

17 25. This category represents time spent by Kelley Drye preparing for and
18 attending hearings on various matters before the Court. During the Application Period, Kelley
19 Drye prepared for and participated in the June 24 contested hearing with respect to the Debtor’s
20 DIP financing, the June 27 “second-day” hearing, and the July 25 contested hearing regarding
21 LVDF’s motions to appoint an examiner, remand the LVDF litigation and lift the automatic stay,
22 as well as the Committee’s motion to intervene in the LVDF litigation.

23 **Contested Matters** (Fees: \$56,088.00 – Hours: 74.7)

24 26. This category represents time spent by Kelley Drye with respect to LVDF’s
25 motion to appoint an examiner and the Debtor’s motion for an order confirming that the
26 terminating sanctions order issued by the state court is void. During the Application Period, Kelley
27 Drye analyzed LVDF’s request for the appointment of an examiner, including the research cited
28 by LVDF in support of same. Kelley Drye conducted extensive research regarding the standard

1 for the appointment of an examiner in the Ninth Circuit and conferred internally, as well as with
2 Carlyon Cica, regarding same. Given the Committee's role in the case, Kelley Drye drafted an
3 opposition to LVDF's request for the appointment of an examiner. Kelley Drye also reviewed the
4 Debtor's motion for contempt for an order confirming that the terminating sanctions are void as a
5 violation of the automatic stay.

6 **Lender Litigation** (Fees: \$68,278.00 – Hours: 111.5)

7 27. This category represents time spent by Kelley Drye with respect to all
8 matters attendant to the LVDF litigation. At the outset of this case, the Debtor removed the state
9 court litigation with LVDF to this Court. LVDF then filed motions seeking to: (i) remand the
10 LVDF litigation back to state court; and (ii) modify the automatic stay to allow the litigation to
11 proceed. Kelley Drye reviewed the record for the state court litigation, analyzed the motions, and
12 conducted research regarding the relief being sought, including whether and to what extent the
13 claims subject to the LVDF litigation are property of the estate. Based on Kelley Drye's research,
14 and in consultation with the Committee, Kelley Drye drafted an opposition to the motion to remand
15 and motion to modify the automatic stay. The Court ultimately denied LVDF's request to remand
16 the LVDF litigation and LVDF's request to modify the automatic stay to allow the case to proceed.

17 28. Given the Committee's position that the claims asserted as part of the LVDF
18 litigation were property of the estate and the impact the LVDF litigation could have on the success
19 of the overall bankruptcy case, the Committee's sought to intervene in the LVDF adversary
20 proceeding. To that end, Kelley Drye drafted a motion seeking to intervene in the LVDF adversary
21 proceeding. The Court approved the Committee's intervention.

22 **Meetings/Communications with Debtor** (Fees: \$16,367.00 – Hours: 18.4)

23 29. This category represents time spent by Kelley Drye conferring and
24 communicating with the Debtor. During the Application Period, Kelley Drye routinely conferred
25 with the Debtor's advisors regarding case status and various pending matters, including the
26 proposed DIP financing, the LVDF litigation, the Debtor's proposed plan and disclosure statement,
27 and various information requests.

28 **Insider Investigation** (Fees: \$22,265.00 – Hours: 25.2)

1 30. This category represents time spent by Kelley Drye investigating potential
2 claims against the Debtor's insiders. During the Application Period, Kelley Drye began its
3 analysis of historic transactions for potential claims. Kelley Drye regularly conferred with
4 Dundon, as well as with the Debtor, regarding potential claims and the Committee's preliminary
5 analysis of same.

6 **V. ACTUAL AND NECESSARY DISBURSEMENTS**

7 31. Kelley Drye's out of pocket disbursements during the Application Period
8 total \$875.87. These disbursements and expenses are broken down into categories of charges in
9 **Exhibit 4**. Kelley Drye submits that the expenses it has incurred in rendering legal services to the
10 Committee during the Application Period are reasonable and necessary under the circumstances,
11 and that the reimbursement to Kelley Drye for such expenses is appropriate and should be allowed.

12 **VI. VALUATION OF SERVICES**

13 32. During the Application Period, Kelley Drye's attorneys and
14 paraprofessionals expended a total of 610.8 hours, for which compensation is sought. **Exhibit 2**
15 provides itemized time records of the attorneys and paraprofessionals that have rendered services
16 to the Committee during the Application Period.

17 33. The rates charged are Kelley Drye's normal hourly rates for work of this
18 character and pursuant to the Kelley Drye's agreement with the Committee. The reasonable value
19 of the services rendered by Kelley Drye to the Committee during the Application Period is
20 \$484,299.50.

21 34. All services for which compensation is requested by Kelley Drye were
22 performed for or on behalf of the Committee, and not on behalf of the Debtor or other persons.
23 There is no agreement or understanding between Kelley Drye and any other person, other than
24 members of the firm, for the sharing of compensation to be received in this case.

25
26 **VII. THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

27 35. Section 330 provides that a court may award a professional employed under
28 section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services

1 rendered [and] reimbursement for actual, necessary expenses.”⁶ Section 330 also sets forth the
2 criteria for the award of such compensation and reimbursement:

3 In determining the amount of reasonable compensation to be
4 awarded to [a] professional person, the court shall consider the
5 nature, the extent, and the value of such services, taking into account
6 all relevant factors, including –

- 7 (A) the time spent on such services;
- 8 (B) the rates charged for such services;
- 9 (C) whether the services were necessary to the administration of,
10 or beneficial at the time at which the service was rendered
11 toward the completion of, a case under this title;
- 12 (D) whether the services were performed within a reasonable
13 amount of time commensurate with the complexity,
14 importance, and nature of the problem, issue, or task
15 addressed;
- 16 (E) with respect to a professional person, whether the person is
17 board certified or otherwise has demonstrated skill and
18 experience in the bankruptcy field; and
- 19 (F) whether the compensation is reasonable based on the
20 customary compensation charged by comparably skilled
21 practitioners in cases other than cases under this title.⁷

22 36. “A customary review of a fee application under § 330 starts with a
23 determination of the ‘lodestar’ [approach], by multiplying a reasonable number of hours expended
24 by a reasonable hourly rate.”⁸ In addition, a bankruptcy court examines the circumstances and
25 manner in which services are performed and results achieved to determine a reasonable fee.⁹ Such
26 examination includes a review of the following factors:

- 27 (a) Were the services authorized?
- 28 (b) Were the services necessary or beneficial to the
administration of the estate at the time they were rendered?
- (c) Are the services adequately documented?
- (d) Are the fees required reasonable, taking into consideration
the factors set forth in section 330(a)(3)?

25 ⁶ 11 U.S.C. § 330(a)(1).

26 ⁷ 11 U.S.C. § 330(a)(3).

27 ⁸ *Unsecured Creditors’ Committee v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th
Cir. 1991); *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983).

28 ⁹ *See Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswig Drug Co. (In re Mednet)*, 251
B.R. 103, 108 (B.A.P. 9th Cir. 2000).

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(e) In making the determination, the court must consider whether the professional exercised reasonable billing judgment.¹⁰

37. In this case, Kelley Drye submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Application were necessary for and beneficial to the Committee’s participation in this chapter 11 case. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (i) the complexity of this case; (ii) the time expended; (iii) the nature and extent of the services rendered; (iv) the value of such services; and (v) the costs of comparable services other than in a case under this title. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought in this Application is warranted.

VIII. NOTICE

38. Notice of this Application has been provided to the Reviewing Parties (as defined in the Interim Compensation Order). Because of the nature of the relief requested, the Committee respectfully submits that no further notice of the Application is necessary or required under the circumstances.

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¹⁰ *Id.*; see also *Leichty v. Neary (In re Strand)*, 375 F.3d 854, 860 (9th Cir. 2004).

CONCLUSION

Kelley Drye respectfully requests: (i) allowance of \$484,299.50 in fees for necessary professional services rendered to the Committee during the Application Period and reimbursement of actual and necessary expenses incurred in the sum of \$875.87, subject to the Final DIP Order; and (ii) such other relief as this Court deems just and proper.

Respectfully submitted.

Dated: September 23, 2022.

CARLYON CICA, CHTD

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*Nevada Counsel to the Official
Committee of Unsecured Creditors*

-and-

KELLEY DRYE & WARREN LLP

By: /s/ Robert L. LeHane, Esq.
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Jason R. Adams, Esq. (admitted *pro hac vice*)
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*Counsel to the Official Committee of Unsecured
Creditors of Front Sight Management LLC*

Exhibit 1**COMPENSATION BY PROJECT CATEGORY
JUNE 13, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

MATTER NUMBER	DESCRIPTION	HOURS	AMOUNT
0001	Case Administration	36.5	\$30,043.50
0002	Pleadings Review	26.6	\$19,218.00
0003	Retention Matters (Applications & Orders)	36.0	\$27,575.00
0004	Fee Matters (Applications & Orders)	19.3	\$15,138.50
0005	Financing/Cash Collateral	64.3	\$57,390.00
0006	Asset Analysis, Recovery and Disposition	0.8	\$720.00
0009	Claims Administration (Analysis & Objection)	12.6	\$11,304.00
0010	Disclosure Statement & Plan	31.9	\$28,519.00
0011	Committee & Creditor Communication	84.7	\$74,765.00
0012	Business Operations	3.0	\$2,692.50
0013	Court Hearings	65.3	\$53,936.00
0016	Contested Matters	74.7	\$56,088.00
0018	Lender Litigation	111.5	\$68,278.00
0019	Meetings and Communications with Debtors	18.4	\$16,367.00
0020	Insider Investigation	25.2	\$22,265.00
Totals:		610.8	\$484,299.50

Exhibit 2

**ITEMIZED FEES
JUNE 13, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
LOS ANGELES
CHICAGO
HOUSTON

NEW YORK
STAMFORD
PARSIPPANY

AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851675

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$19,390.50
Disbursements and Other Charges:	\$105.35

Total Amount Due: \$19,495.85

Terms: Payment Due on or Before August 14, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
LOS ANGELES
CHICAGO
HOUSTON

NEW YORK
STAMFORD
PARSIPPANY

AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851675

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Confer with R. LeHane (KDW) regarding initial case matters and tasks, call with P. Huygens (Province) (.7); begin outlining critical initial matters to address (.5).	JRA	1.20	\$1080.00
06/13/22	Begin creating list of preliminary case tasks (.3); follow up conference with J. Adams (KDW) regarding call with P. Huygens (Province) and initial case matters (.7).	RLL	1.00	900.00
06/14/22	Multiple conferences with R. LeHane (KDW) on preliminary matters, staffing and preliminary discussions with debtor (.5); review publicly available background information on Front Sight (.3).	JRA	0.80	720.00
06/14/22	Review correspondence from R. LeHane and J. Adams (both of KDW) regarding case status and initial tasks (.3); review correspondence with debtor's counsel on introductory matters (.3).	RV	0.60	420.00
06/14/22	Conferences with J. Adams (KDW) on initial tasks (.5); review (.2) and provide comments to (.2) case issues and task list; confer with P.	RLL	1.70	1530.00

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
LOS ANGELES
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HOUSTON

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
Client 029142
Matter 0001
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/14/22	Weintraub (KDW) regarding same (.8). Call with R. LeHane (KDW) regarding case status and team task list (.8); introductory call with local counsel D. Cica (CC) regarding case status (.2); prepare initial draft of critical dates chart (.2).	PAW	1.20	840.00
06/15/22	Review updated task list (.1); conference with R. LeHane, L. Schlusel, R. Vohra and P. Weintraub (all KDW) regarding immediate tasks (.5).	JRA	0.60	540.00
06/15/22	Telephone call with J. Adams, R. LeHane, L. Schlusel, and P. Weintraub (all of KDW) regarding case status and preliminary assignments.	RV	0.50	350.00
06/15/22	Work with local counsel regarding receipt of ECF notices, setup autorule on KDW end.	MMV	0.40	134.00
06/15/22	Initial internal team meeting with R. LeHane, J. Adams, R. Vohra and P. Weintraub (each of KDW) regarding immediate tasks to address.	LSS	0.50	442.50
06/15/22	Conference with KDW team regarding case organization and immediate next steps.	RLL	0.50	450.00
06/15/22	Team call with R. LeHane, J. Adams, L. Schlusel and R. Vohra (all KDW) regarding case status and task list (.5); revise draft task list per team call (.3); update critical dates chart (.6); email with M. Vicinanza (KDW) regarding pro hac applications (.1); review first	PAW	2.50	1750.00

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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July 15, 2022
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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	day filings for case background (1.0). Conference with J. Adams and L. Schlusssel (both KDW) and Dundon team regarding initial case matters.	RLL	0.50	450.00
06/16/22	Review updated task list (.1), critical dates chart (.1) and contact sheet (.1); participate in catch up call with R. LeHane and L. Schlusssel (both KDW) and Dundon Advisors team on case status, next steps (.5); update from P. Weintraub (KDW) and D. Cica (CC) regarding requirements on hearings and notice (.2); review case notice procedures (.2).	JRA	1.20	1080.00
06/16/22	Participate in catch up call with R. LeHane and J. Adams (both KDW) and Dundon Advisors team on case status, next steps	LSS	0.50	442.50
06/16/22	Review email from NYS Appellate Div with Certificate of good standing and draft proc application (.3); review email from D. Cica (CC) regarding 341 meeting and judge's hearing protocols (.2); review and execute local counsel designation (.2).	RLL	0.70	630.00
06/17/22	Conference with R. LeHane (KDW) regarding immediate tasks (.2); team meeting with R. LeHane, L. Schlusssel, and P. Weintraub (all KDW) on action items for next week (.4).	JRA	0.60	540.00
06/17/22	Confer with J. Adams (KDW) regarding priority tasks (.2); meeting with KDW team	RLL	0.60	540.00

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	regarding near term action items and assignments (.4)			
06/17/22	Calendar upcoming omnibus hearings and claims bar date.	MMV	0.80	268.00
06/17/22	Participate in team meeting with R. LeHane, J. Adams, R. Vohra and P. Weintraub (all KDW) on immediate tasks.	LSS	0.40	354.00
06/17/22	Team call with R. LeHane, J. Adams, and L. Schlusel and (all KDW) regarding case status and next steps.	PAW	0.40	280.00
06/20/22	Review case notice procedures to assure team compliance on filings.	JRA	0.30	270.00
06/21/22	Confer with J. Adams (KDW) regarding priority action items and scheduling calls with committee and financial advisors.	RLL	0.20	180.00
06/21/22	Conference with R. LeHane (KDW) regarding case status, DIP, next UCC call, and prep for same (.2); follow up correspondence with R. LeHane (KDW) regarding debtor request of UCC establishment of creditor response portal and general expertise on case issues (.3).	JRA	0.50	450.00
06/23/22	Conferences (2x) with R. LeHane (KDW) on case status, open DIP issues, budget restrictions, investigation issues and next steps.	JRA	0.40	360.00
06/23/22	Confer with D. Cica (CC) regarding staffing, 341 hearing and retention issues (.2); conferences (2x) with J. Adams (KDW)	RLL	0.60	540.00

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06/24/22	regarding case status, open DIP budget issues, 341 meeting and case timeline (.4). Review notes from local counsel of 341 meeting.	JRA	0.20	180.00
06/27/22	Correspondence with R. LeHane (KDW) regarding case status, DIP (.2); update R. LeHane and L. Schlusel (both KDW) following today's hearing on open action items (.2).	JRA	0.40	360.00
06/28/22	Correspondence with R. LeHane (KDW) on case status, DIP status and pleadings filed last night.	JRA	0.30	270.00
06/29/22	Call with KDW team regarding work flows and planning in response to LVDF motions.	RLL	0.70	630.00
06/29/22	Team meeting with R. LeHane, J. Adams, L. Schlusel and R. Vohra (all KDW) to discuss case update and recent filings.	PAW	0.70	490.00
06/29/22	Prepare for (.2) and participate in (.7) internal team call with R. LeHane, L. Schlusel, R. Vohra and P. Weintraub (all KDW) regarding immediate tasks and next steps.	JRA	0.90	810.00
06/29/22	Internal team meeting with R. LeHane, J. Adams, R. Vohra and P. Weintraub (each of KDW) regarding recent case pleadings filed by LVDF and strategy to address same.	LSS	0.70	619.50
06/29/22	Teams call with KDW team to discuss case status and work streams.	RV	0.70	490.00

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Total Services for this Matter: 19,390.50

Other Charges:

Westlaw Research \$105.35

Total Other Charges for this Matter: 105.35

Total this Invoice \$19,495.85

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<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	7.40	900.00	\$6,660.00
LSS	Schlüssel, Lauren	2.10	885.00	1,858.50
MMV	Vicinanza, Marie M	1.20	335.00	402.00
PAW	Weintraub, Philip A	4.80	700.00	3,360.00
RLL	LeHane, Robert L	6.50	900.00	5,850.00
RV	Vohra, Ravi	1.80	700.00	1,260.00

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(212) 808-7800

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JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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INVOICE NUMBER AS PAYMENT REFERENCE

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851676

029142 Front Sight Management Committee
0002 Pleadings Review

Account Summary And Remittance Form

Legal Services:	\$9,778.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$9,778.00

Terms: Payment Due on or Before August 14, 2022

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Client 029142
Matter 0002 Pleadings Review

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	Review filed SOFAs (.7); review Meacher opposition to DIP motion (.3) and order setting deadline to file claims (.2).	RLL	1.20	\$1080.00
06/16/22	Follow up on ECF autorule to ensure proper delivery of case pleadings.	MMV	0.30	100.50
06/16/22	Correspond with R. LeHane and J. Adams (both of KDW) regarding objection deadline to first day motions.	RV	0.10	70.00
06/17/22	Review schedules and SOFA to assess assets and liabilities.	JRA	0.50	450.00
06/21/22	Confer with local counsel regarding ECF notices and issues with receiving emails (.8); check docket to determine documents which were not forwarded (.2) and pull relevant documents for team (1.3).	MMV	2.30	770.50
06/21/22	Update on status of ECF updates (.1) and instructions to L. Schlüssel and M. Vicinanza (both KDW) on docket review (.2).	JRA	0.30	270.00
06/21/22	Summarize the following pleadings for circulation to KDW team: debtor reply to UST objection to BG Law retention (.4);	PAW	2.20	1540.00

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Front Sight Management Committee
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Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/22/22	supplemental Huygens filing in support of DIP (.3); debtor's omnibus reply to DIP (.6); Piazza declaration (.3); FS DIP reply (.6). Review P. Weintraub (KDW) summary of recent docket activity.	RLL	0.20	180.00
06/22/22	Summarize monthly operating report for period ending 5/31/2022.	PAW	0.40	280.00
06/23/22	Summarize recently filed pleadings including reply to UST objection to Province retention and supporting declaration (.3), Britton declaration with attached appraisal (.3), and debtor's removal notice related to LVDF lawsuit (.5).	PAW	1.10	770.00
06/24/22	Review summary of docket activity and notice of removal of District Court litigation (.2); review notice of removal and docket of district court litigation (.3).	RLL	0.50	450.00
06/27/22	Summarize the following pleadings: interim compensation procedures (.6), application to retain Lucas Horsfall (.4), LVDF motion to appoint examiner (.6), motion to terminate stay (.8).	PAW	2.40	1680.00
06/28/22	Review summary of docket activity (.2); review LVDF motion to appoint examiner (.2); review motion to retain accountant (.2); review motion to set interim comp procedures (.2); initial review of motion to terminate stay (1.4).	RLL	2.20	1980.00

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Front Sight Management Committee
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Page 3

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06/28/22	Review update report from P. Weintraub (KDW) on pleadings filed last night.	JRA	0.10	90.00
06/29/22	Review docket and calendar matters scheduled for the hearing on July 25.	MMV	0.20	67.00
Total Services for this Matter:				9,778.00
Total this Invoice				\$9,778.00

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 Matter 0002
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 Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.90	900.00	\$810.00
MMV	Vicinanza, Marie M	2.80	335.00	938.00
PAW	Weintraub, Philip A	6.10	700.00	4,270.00
RLL	LeHane, Robert L	4.10	900.00	3,690.00
RV	Vohra, Ravi	0.10	700.00	70.00

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851677

029142 Front Sight Management Committee
0003 Retention Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$19,594.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$19,594.50

Terms: Payment Due on or Before August 14, 2022

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Client 029142
Matter 0003 Retention Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Call with D. Cica (CC) regarding admission and retention application (.1); conference with J. Adams (KDW) regarding potential financial advisors (.2).	RLL	0.30	\$270.00
06/13/22	Conference with R. LeHane (KDW) regarding potential retention of committee financial advisor (.2); correspondence with J. Gansman (RCA) regarding potential FA role (.1).	JRA	0.30	270.00
06/14/22	Correspondence with P. Weintraub (KDW) regarding Province retention objection deadlines, hearing dates and response to same (.3); call with D. Cica (CC) regarding pro hac motions and retention application (.2); correspondence with M. Vicinanza (KDW) regarding same (.2).	RLL	0.70	630.00
06/14/22	Correspondence with R. LeHane (KDW) and UCC on FA retention and interviews (.2); correspondence with J. Gansman (RCA) (.2) and M. Dundon (DA) (.2) regarding interview process.	JRA	0.60	540.00
06/15/22	Communicate with local counsel regarding	MMV	2.10	703.50

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July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/15/22	filing, preparation of pro hacs (.8); revise pro hac applications of J. Adams (KDW) (.3) and R. LeHane (KDW) (.3); arrange to obtain good standing certificates (.3); prepare designation of counsel (.4). Review (.1) and provide comments to (.1) my draft pro hac; review (.1) and provide comments (.1) to designation of local counsel; follow up correspondence with M. Vicinanza (KDW) (.1) and D. Cica (CC) regarding same (.1); arrange for certificate of good standing (.1); confer with D. Cica (CC) regarding preparation of retention applications (.1).	JRA	0.80	720.00
06/16/22	Emails with M. Vicinanza (KDW) and D. Cica (CC) regarding pro hac vice application.	RLL	0.50	450.00
06/16/22	Follow up internal correspondence on status of pro hac applications, local counsel designation, and notices.	JRA	0.20	180.00
06/16/22	Analyze debtor's application to retain counsel, supporting declarations (.3) and UST objection (.2); analyze debtor's application to retain financial advisor and supporting declarations (.4); prepare internal recommendations on same (.4).	PAW	1.30	910.00
06/17/22	Finalize R. LeHane's (KDW) pro hac application (.2) and designation of counsel (.2) and email local counsel for filing (.1).	MMV	0.50	167.50

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06/21/22	Review debtor's interested parties list (.2); prepare same for the committee retention applications (.1).	RV	0.30	210.00
06/22/22	Review BG Law response to US Trustee objection to 328 retention.	RLL	0.20	180.00
06/22/22	Circulate firmwide email regarding retention (.1); follow up with R. Vohra (KDW) on status of KDW retention application (.2); confer with D. Cica (CC) regarding timing on retention applications for UCC professionals (.2).	JRA	0.50	450.00
06/22/22	Correspond with D. Cica (CC) regarding retention application (.1); revise interested parties list (.2); correspond with J. Adams (KDW) regarding KDW retention application preparation (.3).	RV	0.60	420.00
06/23/22	Finalize J. Adams (KDW) pro hac application and forward to local counsel for filing (.3); finalize L. Schlusel's (KDW) pro hac application for signature and prepare designation of counsel (.6).	MMV	0.90	301.50
06/23/22	Follow up on status of KDW retention application (.1); coordinate same with local counsel (.1).	JRA	0.20	180.00
06/24/22	Review supplement declaration of Dachelet in support of Province retention (.1); confer with J. Adams and R. Vohra (both KDW) regarding status of KDW retention application (.2); call	RLL	0.50	450.00

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06/27/22	with D. Cica (CC) regarding scheduling on UCC retention applications (.2). Review (.3) and provide comments (.2) to Cica retention application; review (.3) and provide comments (.3) to Dundon retention application; correspondence with R. Vohra (KDW) on revisions to KDW retention application (.2).	JRA	1.30	1170.00
06/27/22	Review letter from T. Didion regarding Province retention (.2); correspondence with J. Adams (KDW) regarding response to same (.2).	RLL	0.40	360.00
06/27/22	Review draft application to retain Kelley Drye from R. Vohra (KDW) (.4); revise same to incorporate comments (.5); review draft declaration of R. LeHane (KDW) (.2), M. Eagleton (committee chair) (.2) and proposed order (.2); begin revisions to same (.2).	LSS	1.70	1504.50
06/27/22	Review local rules and procedures (.3) regarding retention applications; draft KDW retention application (2.9); draft LeHane (KDW) declaration (1.1); draft Eagleton (committee chair) declaration (.8); draft proposed order (.4); prepare schedules to LeHane declaration (.5); correspond with L. Schlussel (KDW) regarding retention papers (.2); further revise retention application (.1).	RV	6.30	4410.00
06/28/22	Review further revised draft of Dundon	JRA	0.80	720.00

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Page 5

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06/28/22	retention application (.2) and comments from R. Vohra (KDW) (.1) prior to circulation to the committee; provide comments to draft of KDW retention application from R. Vohra (KDW) (.5). Correspond with L. Schlusel (KDW) regarding finalizing KDW retention applications (.1); prepare signature pages for same (.4); correspond with J. Adams (KDW) regarding KDW retention application (.2); review Dundon retention application and accompanying declaration/order (.5); revise same (.3); correspond with Dundon team regarding same (.1); review comments from J. Adams (KDW) to KDW retention application (.3); incorporate same (.4); correspond with D. Cica (CC) regarding KDW retention application and accompanying papers (.2); correspond with R. LeHane (KDW) regarding his declaration (.1); revise same as per comments from R. LeHane (KDW) (.1); follow up correspondence with L. Schlusel (KDW) regarding final drafts and execution (.2); revise Dundon and KDW retention applications and accompanying papers as per comments from T. O'Steen (CC) (.2).	RV	3.10	2170.00
06/28/22	Review draft declaration of R. LeHane (KDW)	LSS	1.10	973.50

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Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	in support of KDW retention (.1) and revise same (.2); review (.1) and revise (.1) draft Eagleton declaration in support of KDW retention; emails with J. Adams and R. Vohra (each of KDW) regarding same (.2); further review (.2) and finalize (.2) draft KDW retention application for circulation to the committee.			
06/29/22	Follow up with local counsel on filing of retention applications and request to shorten notice.	JRA	0.20	180.00
06/29/22	Emails with D. Cica (CC) regarding finalizing retention applications and motion to hear on shortened notice (.2); follow-up email to R. Vohra (KDW) regarding same (.1); email to M. Eagleton (ALM) regarding final committee professional retention applications for review/sign-off (.1).	LSS	0.40	354.00
06/30/22	Finalize letter to US Trustee regarding Province retention (.3); review comments (.3) and correspondence with J. Adams (KDW) regarding same (.2)	RLL	0.80	720.00
Total Services for this Matter:				19,594.50
Total this Invoice				\$19,594.50

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Front Sight Management Committee
Client 029142
Matter 0003
July 15, 2022
Page 7

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	4.90	900.00	\$4,410.00
LSS	Schluskel, Lauren	3.20	885.00	2,832.00
MMV	Vicinanza, Marie M	3.50	335.00	1,172.50
PAW	Weintraub, Philip A	1.30	700.00	910.00
RLL	LeHane, Robert L	3.40	900.00	3,060.00
RV	Vohra, Ravi	10.30	700.00	7,210.00

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175 GREENWICH STREET
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(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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INVOICE NUMBER AS PAYMENT REFERENCE

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175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851678

029142 Front Sight Management Committee
0005 Financing and Cash Collateral

Account Summary And Remittance Form

Legal Services:	\$54,078.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$54,078.00

Terms: Payment Due on or Before August 14, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
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ACCOUNT NAME: KELLEY DRYE & WARREN LLP
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New York, NY 10007

July 15, 2022
Invoice No. 2851678

Client 029142
Matter 0005 Financing and Cash Collateral

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Call with P. Huygens (Province) regarding debtor's position on DIP and adequate protection/priming fight.	RLL	0.60	\$540.00
06/14/22	Review stipulation extending committee's response and objection deadlines for DIP (.3); confer with D. Cica (CC) (.2), E. McDonald (U.S. Trustee) (.2), and S. Sefflin (BGL) (.2) regarding same.	RLL	0.90	810.00
06/14/22	Assess potential DIP issues for potential objection (.3); review draft updated budget from debtor (.2).	JRA	0.50	450.00
06/15/22	Further review of DIP budget (.1); email correspondence with D. Cica (CC) on DIP objection issues and recent local precedent (.2); further review DIP motion (.3) and first day hearing transcript (.3) in connection with DIP response.	JRA	0.90	810.00
06/15/22	Review motion to approve DIP financing (.8) and portion of transcript from first-day hearing regarding same (.6); begin draft background section regarding objection to DIP (2.2); begin	LSS	4.30	3805.50

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Front Sight Management Committee
Client 029142
Matter 0005
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	draft argument regarding extension of milestones (.7). Review current draft response and objection to DIP financing (.6); strategy conferences with J. Adams and L. Schlusel (both KDW) regarding same (.6).	RLL	1.20	1080.00
06/16/22	Prepare for (.1) and participate in internal update call with R. LeHane and L. Schlusel (both KDW) regarding DIP response strategy and open issues (.6); follow up conference with L. Schlusel (KDW) on DIP response (.1).	JRA	0.80	720.00
06/16/22	Prepare for (.1) and participate in internal update call with R. LeHane and J. Adams (both KDW) regarding DIP response strategy and open issues (.6); follow up conference with J. Adams (KDW) regarding same (.1); review draft asset purchase agreement for relevant DIP terms (.4); revise background section of DIP objection related to company history (.9), DIP provisions (.8), and stalking horse agreement (.4); draft section in response to LVDF opposition in connection with DIP objection (1.4); continue argument relating to DIP milestones (1.3); emails with D. Circa (CC) regarding 9th circuit case law on break-up fees	LSS	11.60	10266.00

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Front Sight Management Committee
Client 029142
Matter 0005
July 15, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/17/22	(.2); review research regarding same (.4); draft argument of DIP objection relating to break-up fees (1.1) and liens on avoidance actions (.7); draft preliminary statement for DIP objection (1.7); review updated draft (.6) and further revise same to incorporate all arguments (.9). Conference with R. LeHane (KDW) regarding DIP objection and responding to Meacher objection (.2); review Meacher objection, supporting declaration, and attached documents on claim and security agreement (.3); review (.4) and revise (2.2) updated draft of DIP objection; conference with R. LeHane and L. Schlusel (both KDW) regarding same (.3); review updated version from L. Schlusel (KDW) (.2) and instructions on follow up with debtor on confi issues (.1).	JRA	3.70	3330.00
06/17/22	Review (.3) and revise (1.3) draft response to DIP and LVDF objections; confer with J. Adams (KDW) regarding DIP objection and response Meacher objections (.2); review revised and updated draft objection (.3); confer with L. Schlusel and J. Adams (both KDW) regarding same (.3); emails with D. Cica (CC) regarding filing of DIP objection and next steps (.2).	RLL	2.60	2340.00
06/17/22	Conference with J. Adams and R. LeHane	LSS	2.20	1947.00

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Front Sight Management Committee
Client 029142
Matter 0005
July 15, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	(each of KDW) with comments to DIP objection (.3); revise draft DIP objection to incorporate comments to same (1.3); email to S. Seflin (BGL) regarding comments to DIP objection (.1); further revise same to incorporate (.1); conference with D. Cica (CC) regarding finalizing/filing same (.2); follow-up emails regarding comments to same (.2).			
06/19/22	Review proposed final DIP order (.7); revise same to incorporate comments (.7); review (.4) and further revise (.3) same.	LSS	2.10	1858.50
06/20/22	Review updated draft proposed final DIP order (.8); begin revisions to same (.7).	LSS	1.50	1327.50
06/21/22	Review L. Schlusel (KDW) mark up of proposed final DIP order from debtor (.4); review loan documents (.8) and stalking horse APA (.4) in connection with same; prepare additional comments to proposed DIP order (.5); conference with L. Schlusel (KDW) on same (.2).	JRA	2.30	2070.00
06/21/22	Review (.3) and further revise (.5) proposed final DIP order; conference with J. Adams (KDW) regarding additional comments to same (.2); further revise draft proposed final DIP order to incorporate additional comments (.9).	LSS	1.90	1681.50
06/22/22	Review the following DIP related pleadings: FS DIP response to committee limited	RLL	1.90	1710.00

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Front Sight Management Committee
Client 029142
Matter 0005
July 15, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/22/22	objection to financing (.3), Piazza declaration in further support of financing (.4), Huygens supplemental DIP declaration and appraisals (.2), and debtor's omni reply to DIP objections (.3); call with P. Huygens (Province) regarding preparation for DIP hearing and discussions with DIP lender (.3); follow up conference with J. Adams regarding same (.2); call with E. Ruebel (Dundon) regarding same (.2). Review D. Cica (CC) correspondence on DIP lender reply to our objection and implications (.2); preliminary review of response (.3); instructions to L. Schlüssel (KDW) on follow up with debtor and FS DIP on call to discuss issues (.2); review debtor response to DIP objections (.3) and supporting declarations from P. Huygens (PA) (.2) and I. Piazza (debtor) (.2); review FS DIP response to UCC objection (.3) and review budget (.2) and email from P. Huygens (Province) in connection with same (.1); confer with R. LeHane (KDW) regarding his call with Province on DIP issues (.2); prepare for (.2) and participate (.8) in DIP negotiation call with L. Schlüssel (KDW), P. Huygens (PA), S. Gubner and S. Sefflin (both BGL) and B. Lindsey (lender counsel); follow up conference with P. Huygens (PA) on same	JRA	3.40	3060.00

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Client 029142
Matter 0005
July 15, 2022
Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/22/22	(.2). Review (.3) and finalize (.7) comments to proposed final DIP order; draft email to S. Seflin (BGL) regarding same (.1); conference with J. Adams (KDW), S. Seflin (BGL), P. Huygens (Province) and B. Lindsey (DIP lender) regarding committee DIP issues (.8).	LSS	1.90	1681.50
06/23/22	Strategy conferences (2x) with J. Adams (KDW) regarding DIP and APA discussions and prep for final DIP hearing (.4); review and comment on update to committee regarding outcome of hearing (.3); calls and emails with debtor's advisors S. Gubner (BGL) (.3) and P. Huygens (Province) (.3) regarding contested DIP issues; follow up call with J. Adams (KDW) (.3) and E. Ruebel (Dundon) (.2) regarding next steps.	RLL	1.80	1620.00
06/23/22	Conferences (2x) with R. LeHane (KDW) on open DIP issues and discussion with debtor and DIP lender (.4); conference with M. Dundon (DA) on same and potential DIP settlement (.2); follow up correspondence with P. Huygens (PA) on open DIP issues (.1); review updated pleadings from debtor and LVDF on admissibility of declarations (.3); correspondence from B. Lindsey (FS DIP counsel) regarding settlement proposal on DIP	JRA	2.50	2250.00

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Client 029142
Matter 0005
July 15, 2022
Page 7

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/23/22	issues (.2); analyze same (.2) and prepare outline of potential response (.2); review (.1) and revise (.2) draft response from L. Schlusel (KDW); follow up correspondence with B. Lindsey and S. Schwartz (FS DIP counsel) on same (.1); conferences with L. Schlusel (KDW) (.2) and R. LeHane (KDW) (.3) on status of DIP negotiations and next steps. Review LVDF objection to debtor recent DIP submissions (.3) and debtor response to same (.2); conference with B. Lindsey (DIP counsel) regarding proposed counter to committee settlement (.4); review email from B. Lindsey (DIP counsel) regarding same (.2); review follow-up from J. Adams (KDW) regarding proposed response to same (.2); email to J. Adams (KDW) with additional comments (.1); draft (.3) revise (.2) email to B. Lindsey (DIP lender) with committee response; conference with J. Adams (KDW) on status of DIP negotiations and next steps (.2).	LSS	2.10	1858.50
06/25/22	Correspondence with R. LeHane (KDW) on open DIP issues (.3); conference with R. LeHane (KDW) and S. Gubner (BGL) on potential DIP resolutions (.9); follow up with R. LeHane (KDW) on same (.1); follow up correspondence with S. Sefflin (BGL) and S.	JRA	1.40	1260.00

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Client 029142
Matter 0005
July 15, 2022
Page 8

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/25/22	Schwartz (SL) on potential settlement discussions (.1). Participate in conference with J. Adams (KDW) and S. Gubner (BGL) regarding open DIP issues (.9); follow up conference with J. Adams (KDW) on same (.1)	RLL	1.00	900.00
06/26/22	Conference with S. Schwartz (SL) regarding potential DIP resolution (.5); update R. LeHane (KDW) regarding results of call and follow up with debtor (.1).	JRA	0.60	540.00
06/27/22	Correspondence with S. Schwartz (SL) and R. LeHane (KDW) on potential settlement parameters (.2); follow up correspondence from S. Schwartz (SL) on settlement and revised order (.1); conference with R. LeHane (KDW) regarding settlement, documentation, next steps (.3).	JRA	0.60	540.00
06/27/22	Email with S. Gubner (BGL) and P. Huygens (Province) regarding open DIP issues (.2); strategy conference with J. Adams (KDW) regarding same (.3).	RLL	0.50	450.00
06/28/22	Email correspondence with S. Schwartz (SL) and debtor's professionals on settlement parameters for DIP and next steps on documenting same (.2); update R. LeHane and L. Schlussel (both KDW) on same (.1); update chambers regarding resolution (.2).	JRA	0.50	450.00

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Client 029142
Matter 0005
July 15, 2022
Page 9

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/29/22	Conference with S. Seflin (BGL) regarding proposed revisions to final DIP order to incorporate committee resolution.	LSS	0.50	442.50
06/30/22	Prepare comments to revised version of final DIP order from S. Seflin (BGL) (.7); conference with L. Schlüssel (KDW) regarding incorporating comments (.2); review further revised draft prior to circulation to debtor (.2); review comments from S. Schwartz (AL) (.3) and follow up correspondence with S. Schwartz (SL) regarding releases; review Loan Documents for additional release language (.5); review updated revised proposed language to confirm scope of releases (.2).	JRA	2.10	1890.00
06/30/22	Review revised proposed final DIP order from debtor (.4); conference with J. Adams (KDW) regarding comments to same (.2); revise proposed final DIP order to incorporate comments (.6); review (.2) and further revise (.2) same; review loan documents for applicable release provision (.2); conference with S. Seflin (BGL) regarding release provisions in loan documents (.3); review further revised drafts from S. Schwartz (DIP lender) (.3) and S. Seflin (BGL) regarding same (.2); follow-up email to S. Seflin (BGL) regarding additional comments to same (.1).	LSS	2.70	2389.50

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Matter 0005
July 15, 2022
Page 10

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	Total Services for this Matter:			54,078.00
	Total this Invoice			\$54,078.00

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Client 029142
Matter 0005
July 15, 2022
Page 11

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	19.30	900.00	\$17,370.00
LSS	Schlusssel, Lauren	30.80	885.00	27,258.00
RLL	LeHane, Robert L	10.50	900.00	9,450.00

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July 15, 2022
Invoice No. 2851687

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$270.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$270.00

Terms: Payment Due on or Before August 14, 2022

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BANK: JP MORGAN CHASE, N.A.
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July 15, 2022
Invoice No. 2851687

Client 029142
Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	Review critical vendor motion (.1); review transcript of first day hearing with respect to same (.2).	JRA	0.30	\$270.00
Total Services for this Matter:				270.00
Total this Invoice				\$270.00

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Client 029142
Matter 0009
July 15, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.30	900.00	\$270.00

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175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851682

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$180.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$180.00

Terms: Payment Due on or Before August 14, 2022

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Client 029142
 Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/27/22	Call with S. Gubner (BGL) regarding outline of plan and status of discussions with Piazza regarding same.	RLL	0.20	\$180.00
Total Services for this Matter:				180.00
Total this Invoice				\$180.00

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July 15, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLL	LeHane, Robert L	0.20	900.00	\$180.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851683

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$33,680.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$33,680.00

Terms: Payment Due on or Before August 14, 2022

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BANK: JP MORGAN CHASE, N.A.

ABA #: 021-000-021

SWIFT CODE: CHASUS33

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ACCOUNT #:135-046110

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July 15, 2022
Invoice No. 2851683

Client 029142
Matter 0011 Committee and Creditor Communications

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Review (.1) and provide comments (.2) to draft R. LeHane UCC update email.	JRA	0.30	\$270.00
06/13/22	Draft initial UCC email regarding confidentiality, initial case tasks, potential FA engagement, next steps, and next UCC call.	RLL	0.70	630.00
06/14/22	Draft committee contact list.	PAW	0.90	630.00
06/15/22	Draft talking points for initial committee call (.9); conference with R. LeHane (KDW) preparatory to same (.2); participate, together with R. LeHane (KDW) in committee call, including financial advisory interviews (1.4).	LSS	2.50	2212.50
06/15/22	Calls with committee members, M. Eagleton (.3), D. Streck (.3) and S. Heun (.2) in advance of UCC call; conference with L. Schlüssel (KDW) in preparation for UCC call (.2); prep for (.3) and meeting with (1.4) UCC on initial matters and to interview financial advisors.	RLL	2.70	2430.00
06/15/22	Begin draft of committee bylaws.	PAW	0.70	490.00
06/16/22	Call with committee member M. Eagleton (ALM) regarding case status and correspondence from UST.	RLL	0.30	270.00

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Front Sight Management Committee
Client 029142
Matter 0011
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	Correspondence with R. LeHane (KDW) regarding UST request on clarification of committee member claim (.2); review UST letter on same (.1).	JRA	0.30	270.00
06/16/22	Review and comment on draft committee bylaws (.6); review and comment on committee contact list (.2); review email from T. Didion (UST) and attachments regarding ALM payment (.5); outline response to same (.3); emails with M. Eagleton (ALM), committee chair, regarding review and execution of local counsel designation (.2).	RLL	1.80	1620.00
06/17/22	Review (.2) and revise (.4) draft of letter response to US Trustee regarding issue with ALM Investments' claim; correspondence with L. Schlusser (KDW) regarding UCC update (.1).	JRA	0.70	630.00
06/17/22	Review revised draft bylaws from P. Weintraub (KDW) (.2) and revise same (.1); review (.1) and finalize (.1) case contact sheet for circulation; draft email to committee with update on DIP objection, administrative matters, bar date and schedules (.9).	LSS	1.40	1239.00
06/17/22	Revise committee contact sheet (.3); revise committee bylaws (.3); emails with L. Schlusser (KDW) regarding same (.1).	PAW	0.70	490.00
06/21/22	Emails (.2) and call (.2) with M. Eagleton	RLL	1.30	1170.00

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Front Sight Management Committee
Client 029142
Matter 0011
July 15, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	(ALM) regarding ALM response to US Trustee letter; review and finalize letter to T. Didion (UST) regarding committee composition (.3); confer with J. Adams (KDW) regarding comments to same (.2); call with KDW team and Dundon Advisors regarding DIP financing discussions and prep for committee update call (.4).			
06/21/22	Conference with R. LeHane, J. Adams (each of KDW), M. Dundon and E. Reubel (each of Province) preparatory to June 22 committee call (.4); draft talking points for June 22 committee call (1.2).	LSS	1.60	1416.00
06/21/22	Update call with R. LeHane and L. Schlusel (both KDW) and Dundon Advisors team in preparation for tomorrow's UCC call (.4); conference with R. LeHane (KDW) regarding UST response letter (.2); preliminary review of talking points for tomorrow's UCC update call (.2).	JRA	0.80	720.00
06/22/22	Review talking points for UCC call (.2); confer with L. Schlusel and J. Adams (both KDW) to prep for same (.5); call with UCC (1.0); finalize letter to T. Didion (UST) regarding committee composition (.3); call with committee member M. Eagleton (ALM) regarding letters to US Trustee and discussions with DIP lender and	RLL	2.20	1980.00

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Client 029142

Matter 0011

July 15, 2022

Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/22/22	debtor (.2). Review L. Schlusel (KDW) draft talking points for today's UCC call (.2); provide comments to same (.2); conference with R. LeHane and L. Schlusel (both KDW) in preparation for today's UCC call (.5); final review of response letter to UST on ALM inquiry (.1).	JRA	1.00	900.00
06/22/22	Draft email to committee with pleadings update (.7); conference with J. Adams and R. LeHane (each of KDW) preparatory to committee call (.5); participate, together with R. LeHane and J. Adams (each of KDW) in committee call (1.0); follow-up email to S. Heun (.1) and T. Donaghy (.1) regarding committee bylaws.	LSS	2.40	2124.00
06/23/22	Email to committee with information on 341 meeting.	LSS	0.30	265.50
06/24/22	Correspondence with R. LeHane (KDW) regarding UCC update regarding DIP hearing (.1); instructions to L. Schlusel (KDW) regarding same (.1); provide comments to draft UCC update (.1).	JRA	0.30	270.00
06/24/22	Draft email to committee with update on DIP hearing (.4); review revisions to same from R. LeHane (KDW) (.1); email to J. Adams and R. LeHane (each of KDW) regarding same (.1); revise draft email update to committee (.1).	LSS	0.70	619.50

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Front Sight Management Committee
Client 029142
Matter 0011
July 15, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/27/22	Emails with S. Heun, regarding status of discussions with DIP lender and debtor (.2); call with M. Eagleton (ALM) regarding correspondence from US. Trustee (.2)	RLL	0.40	360.00
06/27/22	Correspondence with creditor David Wallace regarding committee formation and participation.	JRA	0.10	90.00
06/28/22	Confer with L. Schlusel (KDW) regarding preparation for tomorrow's UCC call (.3); revise UCC update email with results of today's hearing (.3).	JRA	0.60	540.00
06/28/22	Strategy conference with J. Adams (KDW) regarding committee call preparation (.3); draft talking points for committee call (1.1); draft email to committee with update on recently filed pleadings and draft retention applications (1.8); review (.3) and revise (.6) same; review draft committee presentation from Dundon (.3); email to E. Reubel (Dundon) with comments to same (.1).	LSS	4.50	3982.50
06/29/22	Coordinate preparation and pre-call for today's UCC meeting (.1); brief review of Dundon materials in advance of committee circulation (.1); revise talking points for today's UCC call (1.0); participate in pre-call with R. LeHane and L. Schlusel (both KDW) and Dundon Advisers to prepare for call (.5); prepare for	JRA	3.70	3330.00

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Front Sight Management Committee
Client 029142
Matter 0011
July 15, 2022
Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/29/22	(.8) and participate on (1.2) UCC update call. Review and comment on talking points for committee call (.3); call with L. Schlusel and J. Adams (both KDW) and Dundon team in preparation for UCC call (.5); participate in UCC call (1.2).	RLL	2.00	1800.00
06/29/22	Review outline of recent LVDF pleadings from P. Weintraub (KDW) (.3); revise same to incorporate into talking points for committee call (.3); revise (.2) draft talking points for committee meeting; email to committee with materials for call (.1); conference with R. LeHane, J. Adams (each of KDW) and E. Reubel (DA) preparatory to committee call (.5); participate, together with R. LeHane and J. Adams (each of KDW) in committee call (1.2).	LSS	2.60	2301.00
06/30/22	Prepare draft of form response to creditor inquiries regarding case status (.3); forward to D. Cica (CC) for use with creditor inquiries (.1).	JRA	0.40	360.00
06/30/22	Call with M. Eagleton (ALM) regarding response to US Trustee request for information regarding Province retention.	RLL	0.30	270.00
Total Services for this Matter:				33,680.00
Total this Invoice				\$33,680.00

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Front Sight Management Committee
 Client 029142
 Matter 0011
 July 15, 2022
 Page 7

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	8.20	900.00	\$7,380.00
LSS	Schluskel, Lauren	16.00	885.00	14,160.00
PAW	Weintraub, Philip A	2.30	700.00	1,610.00
RLL	LeHane, Robert L	11.70	900.00	10,530.00

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 3 WORLD TRADE CENTER
 175 GREENWICH STREET
 NEW YORK, NEW YORK 10007
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JP MORGAN CHASE, N.A.
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ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
 PLEASE INDICATE CLIENT, MATTER AND
 INVOICE NUMBER AS PAYMENT REFERENCE

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851681

029142 Front Sight Management Committee
0012 Business Operations

Account Summary And Remittance Form

Legal Services:	\$1,260.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,260.00

Terms: Payment Due on or Before August 14, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
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ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
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175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851681

Client 029142
Matter 0012 Business Operations

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	Review cash management motion (.2); review interim order on same (.1); review transcript of first day hearing on same (.2); prepare comments for future final order on same (.1).	JRA	0.60	\$540.00
06/24/22	Review narrative customer description of Front Sight training courses and methods.	RLL	0.50	450.00
06/29/22	Review Dundon summary of cash position, financial affairs, assets and liabilities.	RLL	0.30	270.00
Total Services for this Matter:				1,260.00
Total this Invoice				\$1,260.00

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Front Sight Management Committee
Client 029142
Matter 0012
July 15, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.60	900.00	\$540.00
RLL	LeHane, Robert L	0.80	900.00	720.00

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July 15, 2022
Invoice No. 2851680

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$19,103.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$19,103.00

Terms: Payment Due on or Before August 14, 2022

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007July 15, 2022
Invoice No. 2851680Client 029142
Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/15/22	Email with local counsel D. Cica (CC) regarding hearing protocols for case and mega case designation (.1); review local rules and procedures related to same (.3).	PAW	0.40	\$280.00
06/23/22	Confirm instructions for participation at tomorrow's hearing (.1); conference with L. Schlüssel (KDW) on DIP outline for argument at hearing (.3); begin preparing for tomorrow's hearing, including review of DIP motion (.2), DIP agreement (.2) and preliminary pleadings from interim hearing (.7); begin outlining factual issues to address (.4).	JRA	1.90	1710.00
06/23/22	Research regarding requirements for adequate protection via equity cushion preparatory to contested June 24 DIP hearing (1.4); conference with J. Adams (KDW) regarding same (.3); draft outline of argument regarding adequate protections (1.5); review supplemental response of LVDF regarding DIP (.5); draft outline of responses to same (.8); review (.3) and further revise (.4) draft outline	LSS	5.20	4602.00

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MUMBAI, INDIA

Front Sight Management Committee
Client 029142
Matter 0013
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/24/22	on adequate protection issues. Calls (.2) and emails (.2) with S. Gubner (BGL) regarding today's hearing; call (.2) and emails (.2) with D. Cica (CC) regarding DIP status; confer with J. Adams (KDW) regarding results of today's hearing (.3).	RLL	1.10	990.00
06/24/22	Revise outline for today's DIP hearing (1.3); review most recent declarations filed by debtor relating to FS DIP relationship to debtor and good faith requirements and appraisal (.4); review case law requirements on adequate protection under 364 and 361 (1.0); conference with D. Cica (CC) regarding today's hearing (.3); participate at today's DIP hearing (2.5); follow up conferences with R. LeHane (KDW) (.3) and L. Schlusel (KDW) (.2) regarding results of hearing.	JRA	6.00	5400.00
06/24/22	Revise draft outline of adequate protection argument to incorporate case citations (1.1); review outline preparatory to hearing regarding same (.4); participate, together with J. Adams (KDW), in contested DIP financing hearing (2.5); follow-up conference with J. Adams (KDW) regarding same (.2); conference with E. Reubel (DA) regarding DIP hearing and potential results of same (.2).	LSS	4.40	3894.00
06/27/22	Arrange for appearance at continued first day	MMV	0.20	67.00

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Matter 0013
July 15, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/27/22	hearing scheduled for June 27. Attend today's status conference and hearing on debtor retentions (.5); update R. LeHane and L. Schlusel (both KDW) regarding same (.1).	JRA	0.60	540.00
06/28/22	Prepare talking points for today's hearing to update court on UCC settlement (.3); attend today's continued hearing and oral ruling on the DIP motion (1.5).	JRA	1.80	1620.00
Total Services for this Matter:				19,103.00
Total this Invoice				\$19,103.00

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Page 4

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JRA	Adams, Jason	10.30	900.00	\$9,270.00
LSS	Schluskel, Lauren	9.60	885.00	8,496.00
MMV	Vicinanza, Marie M	0.20	335.00	67.00
PAW	Weintraub, Philip A	0.40	700.00	280.00
RLL	LeHane, Robert L	1.10	900.00	990.00

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029142 Front Sight Management Committee
0016 Other Contested Matters

Account Summary And Remittance Form

Legal Services:	\$5,671.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$5,671.00

Terms: Payment Due on or Before August 14, 2022

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Client 029142
Matter 0016 Other Contested Matters

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/28/22	Review LVDF motion to appoint examiner (.2); preliminary research on 1104(c) standard and conflicting case law on same (.5).	JRA	0.70	\$630.00
06/29/22	Preliminary research for response to LVDF motion to appoint examiner.	RLL	1.20	1080.00
06/29/22	Strategy conference with R. Vohra and E. Maloof (each of KDW) regarding research on appointment of an examiner within the ninth circuit (.5); follow-up conference with R. Vohra (KDW) regarding same (.1).	LSS	0.60	531.00
06/29/22	Further analyze LVDF request for examiner appointment (.3); coordinate additional research on standard (.2); outline issues for potential response (.4).	JRA	0.90	810.00
06/29/22	Conference with L. Schluskel and R. Vohra (both KDW) regarding research assignment regarding appointment of an examiner.	ERM	0.50	150.00
06/29/22	Conference with E. Maloof and L. Schluskel (both of KDW) regarding examiner motion and research regarding same (.5); follow-up with L. Schluskel (KDW) regarding same (.1);	RV	0.70	490.00

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Front Sight Management Committee
Client 029142
Matter 0016
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/30/22	correspond with E. Maloof (KDW) regarding examiner motion (.1). Begin analyzing case precedent regarding examiner appointments (3.2); research on court split regarding examiner appointments (2.5); draft email summarizing preliminary research results (.9).	ERM	6.60	1980.00
Total Services for this Matter:				5,671.00
Total this Invoice				\$5,671.00

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Client 029142
Matter 0016
July 15, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
ERM	Maloof, Emily R	7.10	300.00	\$2,130.00
JRA	Adams, Jason	1.60	900.00	1,440.00
LSS	Schluskel, Lauren	0.60	885.00	531.00
RLL	LeHane, Robert L	1.20	900.00	1,080.00
RV	Vohra, Ravi	0.70	700.00	490.00

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(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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INVOICE NUMBER AS PAYMENT REFERENCE

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851686

029142 Front Sight Management Committee
0018 Lender Litigation

Account Summary And Remittance Form

Legal Services:	\$5,790.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$5,790.00

Terms: Payment Due on or Before August 14, 2022

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ACCOUNT #:135-046110
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July 15, 2022
Invoice No. 2851686

Client 029142
Matter 0018 Lender Litigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/16/22	Emails with counsel to LVDF, B. Shapiro (SL) regarding subpoena notices (.1); review notice and subpoenas (.4); email with S. Sefflin (BGL) regarding debtor response to same (.1).	RLL	0.60	\$540.00
06/21/22	Call with S. Gubner (BGL) regarding response to LVDF objections to DIP and prior repayment litigation (.2); review transcript of hearing regarding same (.9); review summary of EB5 lending programs (.3).	RLL	1.40	1260.00
06/28/22	Preliminary review of LVDF stay relief motion.	JRA	0.40	360.00
06/28/22	Correspondence with J. Adams (KDW) regarding response to LVDF remand motions.	RLL	0.20	180.00
06/28/22	Begin analysis of motion to remand LVDF litigation.	PAW	0.70	490.00
06/30/22	Call with S. Gubner (BGL) regarding response status of state court litigation with LVDF, remand, removal and motion to modify stay (.3); initial review of summary of status of LVDF state court litigation (.5).	RLL	0.80	720.00
06/30/22	Review LVDF state court litigation summary provided by Debtor (.3); review complaint (.7),	PAW	3.20	2240.00

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 Client 029142
 Matter 0018
 July 15, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	second amended complaint (.5) and amended answer and counterclaims (.8); prepare time line summaries of litigation and allegations (.9).			
	Total Services for this Matter:			5,790.00
	Total this Invoice			\$5,790.00

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 Client 029142
 Matter 0018
 July 15, 2022
 Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.40	900.00	\$360.00
PAW	Weintraub, Philip A	3.90	700.00	2,730.00
RLL	LeHane, Robert L	3.00	900.00	2,700.00

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ACCOUNT #:135-046110
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175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851685

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$6,531.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$6,531.50

Terms: Payment Due on or Before August 14, 2022

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July 15, 2022
Invoice No. 2851685

Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Email and call with S. Gubner (BGL) regarding response to DIP and status of discussions with lender.	RLL	0.50	\$450.00
06/13/22	Preliminary correspondence with debtor's advisors regarding engagement and preliminary discussions.	JRA	0.20	180.00
06/14/22	Review current budget (.8); call with Province and BG Law regarding overall case posture, DIP financing and sale APA (1.2); call with S. Seflin (BGL) regarding DIP financing and case exist strategy (.5).	RLL	2.50	2250.00
06/14/22	Preliminary emails with R. LeHane (KDW), S. Gubner (BGL) and P. Huygens (Province) regarding preliminary matters, requested extension of objection deadline, and preliminary discussions on case (.3); participate in introductory case call on DIP and plan process with R. LeHane and L. Schlusel (both KDW), P. Huygens (Province) and S. Gubner and S. Seflin (BGL) (1.2).	JRA	1.50	1350.00
06/14/22	Participate, together with R. LeHane and J	LSS	1.20	1062.00

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Front Sight Management Committee
Client 029142
Matter 0019
July 15, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/15/22	Adams (each of KDW) in introductory call with P. Huygens (Province), S. Seflin and S. Gubner (each of BGL) regarding case overview, upcoming DIP hearing and strategy. Email with debtor's counsel regarding interested parties list and timing of first DIP draw.	PAW	0.20	140.00
06/15/22	Correspond with S. Seflin (BGL) regarding objection deadlines for first day motions (.2); correspond with R. LeHane, J. Adams, P. Weintraub and L. Schlusel (all of KDW) regarding same (.1).	RV	0.30	210.00
06/16/22	Call with S. Seflin (BGL) regarding case status, DIP financing order, sale agreement status, cash management and critical vendor.	JRA	0.30	270.00
06/21/22	Conference with S. Seflin (BGL) regarding comments to proposed final DIP order, upcoming hearing and other case issues.	LSS	0.70	619.50
Total Services for this Matter:				6,531.50
Total this Invoice				\$6,531.50

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Client 029142
Matter 0019
July 15, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.00	900.00	\$1,800.00
LSS	Schluskel, Lauren	1.90	885.00	1,681.50
PAW	Weintraub, Philip A	0.20	700.00	140.00
RLL	LeHane, Robert L	3.00	900.00	2,700.00
RV	Vohra, Ravi	0.30	700.00	210.00

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

July 15, 2022
Invoice No. 2851684

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$450.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$450.00

Terms: Payment Due on or Before August 14, 2022

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July 15, 2022
Invoice No. 2851684

Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
06/13/22	Call with P. Huygens (Province) regarding insider claims overview.	RLL	0.30	\$270.00
06/21/22	Call with Dundon advisors regarding initial review of 4 year insider transactions.	RLL	0.20	180.00
Total Services for this Matter:				450.00
Total this Invoice				\$450.00

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Client 029142
Matter 0020
July 15, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLL	LeHane, Robert L	0.50	900.00	\$450.00

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RUN DATE: July 15, 2022 09:35:05

DATE THRU: June 30, 2022

Page: 7

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

Prebill #: 1813976

FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
06997	Schlüssel , L.S.	06/23/22	Westlaw Research	105.35	H T W	8780335
Totals:				\$105.35		

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RUN DATE: July 15, 2022 09:35:05

DATE THRU: June 30, 2022

Page: 9

Billing Timekeeper: 06284 - LeHane, Robert L

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Prebill #: 1813976

FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges Summary		Amount	Disp
000254	Westlaw Research	105.35	H T W
	Total	105.35	

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175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853051

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$6,771.00
Disbursements and Other Charges:	\$578.42

Total Amount Due: \$7,349.42

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
Invoice No. 2853051

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/05/22	Confer with J. Adams (KDW) regarding prep for calls with UCC and coordination of work on response to LVDF and interim comp motions (.2); telephone call with T. Didion (UST) regarding committee composition and bylaws (.2).	RLL	0.40	\$360.00
07/05/22	Conference with R. LeHane (KDW) regarding immediate tasks for this week.	JRA	0.20	180.00
07/07/22	Conference with R. LeHane (KDW) regarding pleadings preparation, communications with debtor and next steps (.2); review case task list for updates (.2).	JRA	0.40	360.00
07/07/22	Confer with J. Adams (KDW) regarding update on discussions with counsel to debtor and local counsel regarding response to LVDF motions (.2); revise response to UST request for additional information regarding Province retention and ALM UCC membership (1.2); correspondence with J. Adams (KDW) regarding same (.2).	RLL	1.60	1440.00
07/08/22	Review and update critical dates and task list.	RLL	0.20	180.00

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Front Sight Management Committee
Client 029142
Matter 0001
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/12/22	Conference with R. LeHane and L. Schlusel (both KDW) regarding immediate action items and next steps following filing of yesterday's pleadings in response to LVDF motions (.3); follow up team meeting with R. LeHane, L. Schlusel, R. Vohra and P. Weintraub (all KDW) on assignments related to plan, LVDF matters, and insider investigation (.3).	JRA	0.60	540.00
07/12/22	Meeting with J. Adams and L. Schlusel (both KDW) regarding work streams and prep for hearings on LVDF motions (.3); email (.1) and call (.1) with T. Didion (UST) regarding LVDF examiner motion; meeting with KDW team regarding critical dates and work stream assignments (.3).	RLL	0.80	720.00
07/12/22	Email with S. Alceus (KDW) regarding progress of assembling LVDF documents (.1); update KDW case task list (.5); attend KDW team update call with J. Adams, R. LeHane, L. Schlusel, and R. Vohra (all KDW) (.3).	PAW	0.90	630.00
07/12/22	Strategy conference with J. Adams and R. LeHane (each of KDW) regarding various workstreams and process for handling same (.3); follow-up team meeting with R. LeHane, J. Adams, P. Weintraub, and R. Vohra (each of KDW) regarding same (.3).	LSS	0.60	531.00
07/12/22	Teams call with KDW team regarding work	RV	0.30	210.00

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Client 029142
Matter 0001
August 4, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/18/22	streams and case status. Review letter from T. Didion (UST) regarding closure of ALM matter (.2); follow up email to T. Didion (UST) regarding same (.1).	RLL	0.30	270.00
07/19/22	Coordinate internal update discussion with R. LeHane and L. Schlussel (both KDW).	JRA	0.10	90.00
07/20/22	Prepare calendar entries with zoom links for scheduled 2004 depositions.	PAW	0.50	350.00
07/21/22	Revise and circulate KDW team internal task list.	PAW	0.30	210.00
07/24/22	Correspondence with J. Adams and L. Schlussel (both KDW) regarding staffing on workstreams and pro hac admissions (.3); correspondence with R. Vohra (KDW) regarding pro hac admission (.2); emails with M. Vicinanza (KDW), D. Cica and N. Rodriquez (both CC) regarding same (.2).	RLL	0.70	630.00
07/26/22	Correspond with N. Rodriguez (CC) regarding pro hac vice motion.	RV	0.10	70.00

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Client 029142
Matter 0001
August 4, 2022
Page 4

Total Services for this Matter: 6,771.00

Other Charges:

Telephone	\$61.93
Westlaw Research	131.27
Lexis Research	385.22

Total Other Charges for this Matter: 578.42

Total this Invoice \$7,349.42

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August 4, 2022
Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.30	900.00	\$1,170.00
LSS	Schluskel, Lauren	0.60	885.00	531.00
PAW	Weintraub, Philip A	1.70	700.00	1,190.00
RLL	LeHane, Robert L	4.00	900.00	3,600.00
RV	Vohra, Ravi	0.40	700.00	280.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853052

029142 Front Sight Management Committee
0002 Pleadings Review

Account Summary And Remittance Form

Legal Services:	\$2,840.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,840.00

Terms: Payment Due on or Before September 3, 2022

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BANK: JP MORGAN CHASE, N.A.
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Front Sight Management Committee
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175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853052

Client 029142
Matter 0002 Pleadings Review

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/07/22	Review interim compensation order (.2); correspond with L. Schlusel (KDW) regarding same (.1); correspond with S. Sefflin (BGL) regarding same (.1).	RV	0.40	\$280.00
07/08/22	Review notice of 2004 exams of LVDF (.2) and debtor motion for determination that termination sanctions order violated stay and is void (.3).	RLL	0.50	450.00
07/08/22	Review P. Weintraub (KDW) summary of debtor 2004 motions.	JRA	0.20	180.00
07/08/22	Review correspondence from P. Weintraub (KDW) regarding debtor's 2004 motions.	RV	0.10	70.00
07/14/22	Preliminary review of the following pleadings on 2004 requests (.1), new 2004 motions file by debtor (.1), UST objection to proposed accountant retention (.1), FS DIP response to LVDF pleadings and interim compensation procedures (.1).	JRA	0.40	360.00
07/15/22	Review and circulate to KDW team filed plan documents (.3); review, summarize and circulate other pleading filed on 7/14 and 7/15	PAW	1.20	840.00

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Front Sight Management Committee
Client 029142
Matter 0002
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/18/22	pleadings including UST objection to Horfsall, FS DIP reservation of rights and various 2004 motions, orders and subpoenas (.9). Review P. Weintraub (KDW) summary of pleadings filed on July 15 (.2); instructions to KDW team regarding review and follow up (.1).	JRA	0.30	270.00
07/18/22	Review correspondence from P. Weintraub (KDW) regarding summaries of recent pleadings (.1); review LVDF pleadings filed on July 18 (.2).	RV	0.30	210.00
07/20/22	Review P. Weintraub (KDW) summary of today's filed pleadings, including LVDF opposition to UCC motion to intervene.	JRA	0.20	180.00
Total Services for this Matter:				2,840.00
Total this Invoice				\$2,840.00

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Front Sight Management Committee
 Client 029142
 Matter 0002
 August 4, 2022
 Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.10	900.00	\$990.00
PAW	Weintraub, Philip A	1.20	700.00	840.00
RLL	LeHane, Robert L	0.50	900.00	450.00
RV	Vohra, Ravi	0.80	700.00	560.00

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853053

029142 Front Sight Management Committee
0003 Retention Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$7,130.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$7,130.50

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
Invoice No. 2853053

Client 029142
Matter 0003 Retention Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Review (.4) and revise (1.4) letter response to UST regarding UCC consideration of Province retention; conferences (2x) with R. LeHane (KDW) regarding same (.4).	JRA	2.20	\$1980.00
07/01/22	Review J. Adams (KDW) comments and edits to response to UST letter on Province retention (.3); finalize letter to T. Didion (UST) regarding Province retention (.8); multiple conferences with J. Adams (KDW) regarding same (.4).	RLL	1.50	1350.00
07/02/22	Correspond with L. Schlüssel (KDW) regarding UCC retention paper signature packet (.1); revise retention applications and accompanying papers as per comments from T. O'Steen (CC) (.2); correspond with T. O'Steen (CC) regarding same (.1).	RV	0.40	280.00
07/05/22	Review order shortening time on UCC professionals' retention applications (.1); circulate calendar invites regarding same (.1).	RV	0.20	140.00
07/19/22	Telephone call (.1) and emails (.1) with E. MacDonald (UST) regarding KDW retention	RLL	0.70	630.00

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Front Sight Management Committee
Client 029142
Matter 0003
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/19/22	terms; confer with L. Schlusel (KDW) regarding response to same (.1); review responses of UST (.1) and Debtor reply (.1) to Horsfall retention application; review docket summary for response to UCC professionals retention applications (.2). Review objection of UST to debtor's retention of Lucas Horsfall (.2) and debtor response to same (.2); confer with R. LeHane (KDW) regarding UST comments to committee retention applications (.1); review retention applications (.2) and applicable bankruptcy code provisions (.2) regarding same; brief research regarding same (.2).	LSS	1.10	973.50
07/19/22	Email correspondence with E. McDonald (UST) regarding KDW retention application and modification to order.	JRA	0.20	180.00
07/22/22	Phone call (.2) and emails (.2) with E. McDonald (UST) regarding Dundon Advisors retention order; emails with E. Ruebel (Dundon) regarding same (.1); confer with R. Vohra (KDW) on same (.1).	RLL	0.60	540.00
07/22/22	Conference with R. LeHane (KDW) regarding US Trustee comments to KDW and Dundon retention applications (.1); review same (.1); correspond with R. LeHane (KDW) regarding same (.2).	RV	0.40	280.00

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Front Sight Management Committee
Client 029142
Matter 0003
August 4, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/22/22	Emails with D. Cica (CC) regarding process for submission of revised order approving UCC professionals' retention.	LSS	0.20	177.00
07/25/22	Confer with R. Vohra (KDW) (.1) and emails with E. McDonald (UST) regarding revised retention orders for Dundon and KDW (.1).	RLL	0.20	180.00
07/25/22	Correspond with E. McDonald (UST) and D. Cica (CC) regarding revised retention orders (.2); conference with R. LeHane (KDW) regarding same (.1); revise Dundon and Kelley Drye retention orders (.2).	RV	0.50	350.00
07/28/22	Correspond with D. Cica (CC) regarding retention orders.	RV	0.10	70.00
Total Services for this Matter:				7,130.50
Total this Invoice				\$7,130.50

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Front Sight Management Committee
 Client 029142
 Matter 0003
 August 4, 2022
 Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.40	900.00	\$2,160.00
LSS	Schlüssel, Lauren	1.30	885.00	1,150.50
RLL	LeHane, Robert L	3.00	900.00	2,700.00
RV	Vohra, Ravi	1.60	700.00	1,120.00

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 3 WORLD TRADE CENTER
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 NEW YORK, NEW YORK 10007
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PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853054

029142 Front Sight Management Committee
0004 Fee Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$4,395.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$4,395.50

Terms: Payment Due on or Before September 3, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
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SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

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175 GREENWICH STREET
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c/o Robert LeHane
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August 4, 2022
Invoice No. 2853054

Client 029142
Matter 0004 Fee Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/07/22	Review comments to interim compensation procedures from R. Vohra (KDW) (.1); provide additional comments to same (.2).	LSS	0.30	\$265.50
07/11/22	Begin review of KDW invoices for June in connection with preparation of first monthly fee statement in accordance with interim compensation procedures and bi-weekly reporting under DIP financing.	JRA	2.10	1890.00
07/11/22	Correspond with J. Adams (KDW) regarding FS DIP June fee statement (.1); correspond with J. Adams (KDW) and S. Sefflin (BG Law) regarding interim compensation order and comments thereto (.2).	RV	0.30	210.00
07/12/22	Review LVDF response to motion to establish interim compensation procedures (.1); follow up correspondence with R. LeHane and L. Schlüssel (both KDW) regarding impact of same and response (.2); continue review of KDW invoices for June in connection with preparation of monthly fee statement and bi-weekly reporting requirements under DIP	JRA	1.40	1260.00

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Front Sight Management Committee
Client 029142
Matter 0004
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/13/22	(1.1). Review FS DIP invoices (.2); correspond with J. Adams (KDW) regarding same (.1).	RV	0.20	140.00
07/14/22	Final review of KDW invoices for June in connection with preparation of monthly fee statement and estimate under DIP.	JRA	0.70	630.00
Total Services for this Matter:				4,395.50
Total this Invoice				\$4,395.50

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Front Sight Management Committee
Client 029142
Matter 0004
August 4, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	4.20	900.00	\$3,780.00
LSS	Schluskel, Lauren	0.30	885.00	265.50
RV	Vohra, Ravi	0.50	700.00	350.00

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175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853055

029142 Front Sight Management Committee
0005 Financing and Cash Collateral

Account Summary And Remittance Form

Legal Services:	\$2,952.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,952.00

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
Invoice No. 2853055

Client 029142
Matter 0005 Financing and Cash Collateral

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Review updated DIP budget from P. Huygens (Province) (.2); follow up correspondence with P. Huygens (Province) and Dundon team regarding same, go forward review and budget variances (.1); brief review of further revised DIP order to incorporate additional comments (.2); follow up correspondence with L. Schlüssel (KDW), S. Seflin (BGL) and other parties regarding final sign off on final DIP order (.3).	JRA	0.80	\$720.00
07/01/22	Review further revised DIP order (.3); email to J. Adams (KDW) regarding same (.1); provide additional comments to S. Seflin (BGL) regarding same (.2); conference with S. Seflin (BGL) regarding status of final DIP order and proposed budget (.1); conference with E. Reubel (Dundon) regarding revised budget and concerns with same (.4); follow-up email to S. Seflin (BGL) regarding committee signoff (.1).	LSS	1.20	1062.00
07/06/22	Review revised budget and Dundon analysis regarding same.	RLL	0.60	540.00

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Front Sight Management Committee
 Client 029142
 Matter 0005
 August 4, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/07/22	Brief review of FS DIP fee statement for June and instructions to team on analysis.	JRA	0.10	90.00
07/13/22	Correspondence from Province on budget reporting under DIP (.1); instructions to KDW team on same (.1).	JRA	0.20	180.00
07/18/22	Analyze updated DIP budget from P. Huygens (Province) (.3); update to R. LeHane (KDW) on same and key takeaways (.1).	JRA	0.40	360.00
Total Services for this Matter:				2,952.00
Total this Invoice				\$2,952.00

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Client 029142
Matter 0005
August 4, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.50	900.00	\$1,350.00
LSS	Schluskel, Lauren	1.20	885.00	1,062.00
RLL	LeHane, Robert L	0.60	900.00	540.00

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853056

029142 Front Sight Management Committee
0006 Asset Analysis, Recovery and Disposition

Account Summary And Remittance Form

Legal Services:	\$720.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$720.00

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
 Invoice No. 2853056

Client 029142
 Matter 0006 Asset Analysis, Recovery and Disposition

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/28/22	Conference with S. Schwartz (SL), counsel for FS DIP, regarding case status, plan prospects, sale and potential meeting between FS DIP and UCC (.3); review materials from same regarding FS DIP corporate parent (.3); follow up correspondence with R. LeHane and L. Schlüssel (both KDW) regarding same (.2).	JRA	0.80	\$720.00
Total Services for this Matter:				720.00
Total this Invoice				\$720.00

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Client 029142
Matter 0006
August 4, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.80	900.00	\$720.00

PAYMENT BY CHECK:

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ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853065

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$2,340.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,340.00

Terms: Payment Due on or Before September 3, 2022

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BANK: JP MORGAN CHASE, N.A.
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August 4, 2022
Invoice No. 2853065

Client 029142
Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/21/22	Review claims register for new claims (.2); analyze large claims (in excess of \$10MM) for substance and potential areas for challenge (.5); outline follow up questions for debtor on same (.3).	JRA	1.00	\$900.00
07/27/22	Follow up correspondence with individual UCC members on claims bar date.	JRA	0.40	360.00
07/29/22	Further analyze significant claims filed in connection with FS bucks and coin to assess legal validity of claims and address LVDF questions on same (.7); review Piazza correspondence on same (.4); follow up with Dundon team on same (.1).	JRA	1.20	1080.00
Total Services for this Matter:				2,340.00
Total this Invoice				\$2,340.00

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Front Sight Management Committee
Client 029142
Matter 0009
August 4, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.60	900.00	\$2,340.00

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175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853060

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$16,515.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$16,515.00

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
Invoice No. 2853060

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/08/22	Conference with P. Huygens (Province) regarding status of draft plan and disclosure statement, core terms, and UCC review and comment.	JRA	0.30	\$270.00
07/12/22	Initial review and analysis of plan projections, liquidation analysis and notes.	RLL	1.10	990.00
07/12/22	Review the following plan related documents from the debtor: financial projections (.2) and liquidation analysis (.4); outline follow up questions on same (.2); follow up with P. Huygens (Province) on status of remaining plan documents (.1).	JRA	0.90	810.00
07/12/22	Conference with S. Seflin (BG) regarding plan overview and timeline for same.	LSS	0.40	354.00
07/13/22	Review proposed financial projections (.5) and draft liquidation analysis (.4) from the debtor in connection with proposed plan.	LSS	0.90	796.50
07/14/22	Review draft disclosure statement in connection with debtor's proposed plan (2.6); draft preliminary outline of proposed creditor treatment (.5); conference with S. Seflin (BG)	LSS	4.40	3894.00

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Front Sight Management Committee
Client 029142
Matter 0010
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/14/22	regarding plan overview and strategy (1.0); follow-up conference with J. Adams (KDW) regarding same (.3). Preliminary review of draft disclosure statement from debtor (1.6); conference with L. Schlüssel (KDW) regarding same (.3); review correspondence from Dundon team on same and review of supporting financial assumptions (.2).	JRA	2.10	1890.00
07/15/22	Continue review of draft disclosure statement and plan.	RLL	0.70	630.00
07/18/22	Review memorandum from Dundon Advisers regarding debtor's business plan and related projections.	LSS	0.80	708.00
07/19/22	Review Dundon Advisors memo regarding plan projections.	RLL	0.40	360.00
07/19/22	Review Dundon preliminary analysis on plan issues.	JRA	0.30	270.00
07/21/22	Review update report from E. Reubel (Dundon) regarding discussion with Province on plan and next steps (.1); confer with L. Schlüssel (KDW) regarding outlining plan and disclosure statement issues for discussion with debtor (.3); review core issues to address in plan (.4).	JRA	0.80	720.00
07/21/22	Conference with E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding business plan analysis and next steps (.7); follow-up	LSS	1.00	885.00

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Front Sight Management Committee
Client 029142
Matter 0010
August 4, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/25/22	conference with J. Adams (KDW) regarding same (.3). Review Dundon analysis of updated plan projections.	RLL	0.50	450.00
07/25/22	Review revised memorandum from Dundon Advisers regarding business plan assumptions and sensitivity analysis (.5); conference with E. Reubel and Y. Zhu (each of DA) regarding same (.5).	LSS	1.00	885.00
07/26/22	Review updated analysis from Dundon team regarding plan projections and liquidation analysis (.4); prepare notes on same to follow up on open assumptions and questions (.3); review member information in connection with claims and classification issues (.3); follow up on liquidation analysis open issues, claims pool and potential distributable value (.2).	JRA	1.20	1080.00
07/28/22	Conference with L. Schlusel (KDW) and Dundon team regarding plan analysis, potential settlement discussions, and next steps on same and potential global resolution proposal (.5); follow up with L. Schlusel (KDW) on outlining same (.1).	JRA	0.60	540.00
07/28/22	Conference with J. Adams (KDW), E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding business plan overview, concerns and next steps regarding same.	LSS	0.50	442.50

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Front Sight Management Committee
 Client 029142
 Matter 0010
 August 4, 2022
 Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/29/22	Follow up review of alternative firearm training facilities provided by committee member to assess membership and fee structure in comparison to Front Sight proposal under plan.	JRA	0.60	540.00
Total Services for this Matter:				16,515.00
Total this Invoice				\$16,515.00

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 Client 029142
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 August 4, 2022
 Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	6.80	900.00	\$6,120.00
LSS	Schlusssel, Lauren	9.00	885.00	7,965.00
RLL	LeHane, Robert L	2.70	900.00	2,430.00

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MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853061

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$27,072.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$27,072.50

Terms: Payment Due on or Before September 3, 2022

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New York, NY 10007

August 4, 2022
Invoice No. 2853061

Client 029142
Matter 0011 Committee and Creditor Communications

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Calls with the following committee members on case status: M. Eagleton (ALM) (.4), D. Streck (.3), and T. Donaghy (.2); emails with committee members regarding response to US Trustee inquiries (.7).	RLL	1.60	\$1440.00
07/05/22	Strategy conference with J. Adams (KDW) preparatory to committee call (.2); emails with E. Reubel (DA) regarding same (.2); draft talking points for committee call (1.1).	LSS	1.50	1327.50
07/05/22	Call with L. Schlusel (KDW) in preparation for tomorrow's UCC call.	JRA	0.20	180.00
07/06/22	Review Dundon materials for today's UCC call (.2); review L. Schlusel (KDW) comments to same (.1); review talking points for today's UCC call (.2); instructions to L. Schlusel (KDW) on same and agenda (.1); conference with R. LeHane and L. Schlusel (both KDW) in preparation for today's UCC call (.3); prepare for (.5) and participate with L. Schlusel (KDW) (.7) on today's UCC call; follow up instructions to L. Schlusel (KDW)	JRA	2.40	2160.00

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Front Sight Management Committee
Client 029142
Matter 0011
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/06/22	on next call (.2); follow up correspondence with R. LeHane (KDW) on outcome of call (.1). Review proposed talking point for UCC Call (.2); call with J. Adams and L. Schlusel (both KDW) regarding prep for call with committee (.3); emails with committee members, D. Streck regarding case status and response to LVDF litigation (.2).	RLL	0.70	630.00
07/06/22	Review draft presentation from Dundon (.2); provide comments to same (.3); strategy conference with R. LeHane and J. Adams (each of KDW) regarding upcoming committee call (.3); conference with E. Reubel (DA) regarding same (.1); review talking points preparatory to committee call (.6); participate, together with J. Adams (KDW), in committee call (.7).	LSS	2.20	1947.00
07/07/22	Confer with UCC members M. Eagleton (.2); S. Heun (.2); D. Streck (.2); TA. Donaghy (.2) regarding Province retention and correspondence with UST regarding same.	RLL	0.80	720.00
07/08/22	Review draft UCC update from R. Vohra (KDW) on LVDF litigation.	JRA	0.20	180.00
07/10/22	Draft email to committee with draft opposition pleadings and update on recently filed debtor pleadings.	LSS	0.40	354.00
07/11/22	Call with D. Streck, Committee member,	RLL	0.60	540.00

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Client 029142
Matter 0011
August 4, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/11/22	regarding opposition to LVDF and status of plan process. Follow up correspondence from T. Didion (UST) regarding ALM participation in UCC consideration of examiner motion (.1); correspondence with R. LeHane (KDW) regarding same (.1).	JRA	0.20	180.00
07/12/22	Review draft UCC update email on yesterday's pleadings (.2); follow up with R. LeHane (KDW) on additional inquiry from T. Didion (UST) on information related to ALM and voting on examiner motion (.1).	JRA	0.30	270.00
07/12/22	Review draft email from R. Vohra (KDW) to the committee with pleadings update (.3); revise same (.6); review case dockets to ensure inclusion of all recent pleadings (.4); review recent 2004 motions for inclusion (.2); review joinder of LVDF co-defendants in remand (.2); update draft email to committee with same (.4).	LSS	2.10	1858.50
07/12/22	Prepare email for the committee regarding July 11 filings and summaries thereto (.8); correspond with L. Schluskel (KDW) regarding same (.1).	RV	0.90	630.00
07/14/22	Draft email to committee with update on draft disclosure statement.	LSS	0.50	442.50
07/18/22	Review follow up letter from T. Didion (UST) regarding closing of inquiry into ALM issues.	JRA	0.20	180.00

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Front Sight Management Committee
Client 029142
Matter 0011
August 4, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/19/22	Conference with R. LeHane and J. Adams (each of KDW) regarding strategy for upcoming committee call and adjournment of same (.2); draft email to committee with update on recently filed pleadings (1.1).	LSS	1.30	1150.50
07/19/22	Review UCC update on last night's pleadings prior to circulation (.2); email correspondence with Dundon team regarding need to reschedule tomorrow's UCC call (.1); conference with R. LeHane and L. Schlusel (both KDW) regarding same (.2).	JRA	0.50	450.00
07/19/22	Confer with L. Schlusel and J. Adams (both KDW) regarding committee call schedule and pleadings update (.2) emails with committee member, M. Eagleton, regarding same (.1).	RLL	0.30	270.00
07/22/22	Emails with committee member D. Streck regarding status of LVDF litigation.	RLL	0.20	180.00
07/25/22	Draft email to committee with update regarding debtor status report on 2004 discovery dispute and LVDF response to same (1.1); draft follow-up email to committee with hearing update (.5).	LSS	1.60	1416.00
07/25/22	Review UCC update regarding today's hearing in advance of sending.	JRA	0.20	180.00
07/26/22	Confer with J. Adams and L. Schlusel (both KDW) regarding prep for committee meeting.	RLL	0.30	270.00
07/26/22	Conference with R. LeHane and L. Schlusel	JRA	2.70	2430.00

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August 4, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	(both KDW) regarding tomorrow's committee call (.3); review Dundon team presentation to the UCC (.3) and provide comments to same (.2); review draft talking points from L. Schlusel for tomorrow's UCC call (.5); prepare for (.2) and participate (1.0) in conference with L. Schlusel (KDW) and Dundon team, including E. Reubel, regarding tomorrow's UCC call and discussion materials for same; review revised draft of same before circulation to the UCC (.2).			
07/26/22	Review presentation from Dundon Advisers for committee call (.3); conference with J. Adams and R. LeHane (each of KDW) regarding upcoming committee call preparation (.3); strategy conference with J. Adams (KDW), E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding same, business plan and upcoming committee call (1.0); review revised presentation from Dundon Advisers incorporating comments (.2); email to committee with same in advance of July 27 committee call (.1); email to M. Eagleton regarding hearing results and upcoming pleadings to be filed by LVDF (.2); draft talking points for committee call (.9).	LSS	3.00	2655.00
07/27/22	Revise talking points for today's UCC call	JRA	3.10	2790.00

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Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/27/22	(1.3); conduct today's committee call with L. Schlusssel (KDW) and Dundon team (1.4); follow up conference with L. Schlusssel (KDW) regarding same and next steps (.2); follow up correspondence with D. Streck (UCC member) regarding training alternatives and impact on analysis of plan (.2). Participate, together with J. Adams (KDW), in committee call (1.4); follow-up conference with J. Adams (KDW) regarding same (.2); follow-up conference with E. Reubel (DA) regarding same and case follow-up (.1); review draft email from R. Vohra (KDW) to committee members regarding bar date (.1); revise same (.1).	LSS	1.90	1681.50
07/27/22	Prepare emails to each committee member with claim information and proof of claim instructions (.6); correspond with L. Schlusssel and J. Adams (both of KDW) regarding same (.2).	RV	0.80	560.00
Total Services for this Matter:				27,072.50
Total this Invoice				\$27,072.50

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Page 7

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	10.00	900.00	\$9,000.00
LSS	Schlüssel, Lauren	14.50	885.00	12,832.50
RLL	LeHane, Robert L	4.50	900.00	4,050.00
RV	Vohra, Ravi	1.70	700.00	1,190.00

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853059

029142 Front Sight Management Committee
0012 Business Operations

Account Summary And Remittance Form

Legal Services:	\$802.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$802.50

Terms: Payment Due on or Before September 3, 2022

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3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853059

Client 029142
Matter 0012 Business Operations

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/22/22	Emails with E. Reubel (DA) regarding operating report and discrepancy with DIP budget.	LSS	0.30	\$265.50
07/22/22	Review summary of June MOR from E. Reubel (Dundon) (.2); review underlying MOR to cross-reference analysis and address open questions on discrepancies (.2).	JRA	0.40	360.00
07/26/22	Review email and information from E. Reubel (DA) regarding Gold Status members and company contributions.	LSS	0.20	177.00
Total Services for this Matter:				802.50
Total this Invoice				\$802.50

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Front Sight Management Committee
Client 029142
Matter 0012
August 4, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.40	900.00	\$360.00
LSS	Schlusssel, Lauren	0.50	885.00	442.50

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PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853058

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$32,052.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$32,052.00

Terms: Payment Due on or Before September 3, 2022

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BANK: JP MORGAN CHASE, N.A.
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Client 029142
Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/12/22	Conference with D. Cica (CC) regarding strategy for upcoming July 25 hearing.	LSS	0.20	\$177.00
07/21/22	Meeting with R. LeHane, L. Schlusser, R. Vohra and P. Weintraub (all KDW) regarding preparation for Monday's hearing.	JRA	0.30	270.00
07/21/22	Emails with local counsel regarding appearance at July 25 hearing as well as zoom link to appear (.1); email the Dundon team with links to the hearing (.1).	MMV	0.20	67.00
07/21/22	Teams meeting with KDW Team to discuss work streams for July 25 hearing.	RV	0.30	210.00
07/21/22	Confer with KDW team to coordinate prep for 7/25 omnibus hearing.	RLL	0.30	270.00
07/21/22	Review updated case task list preparatory to internal team meeting (.1); internal strategy conference with J. Adams, R. LeHane, R. Vohra and P. Weintraub (each of KDW) regarding upcoming hearing and preparation for same (.3); review motion to appoint examiner (.2), Kelley Drye response (.4); debtor response (.2) and LVDF reply (.4) to	LSS	4.20	3717.00

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Client 029142
Matter 0013
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Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/21/22	same; draft talking points relating to examiner motion for hearing (1.4); review (.3) and revise (.5) same; conference with S. Seflin (BGL) regarding status report of discovery dispute for upcoming hearing (.4). Team meeting with R. LeHane, J. Adams, L. Schlüssel, R. Vohra (all KDW) to prepare for July 25 hearing (.3); prepare comprehensive index of documents for July 25 hearing (1.4).	PAW	1.70	1190.00
07/22/22	Review and revise summary of arguments and index of pleadings in preparation for July 25 omnibus hearing (1.4); conference with R. Vohra (KDW) regarding same (.1).	RLL	1.50	1350.00
07/22/22	Review pleadings index from P. Weintraub (KDW) in connection with Monday's hearing (.2); follow up with R. LeHane (KDW) regarding same, updating and hearing preparation (.2); review updated index (.1); correspondence with R. LeHane and R. Vohra (both KDW) on preparation for Monday's hearing (.4); correspondence with D. Cica (CC) regarding responsive pleadings for hearing and confirming appearances for matters (.2).	JRA	1.10	990.00
07/22/22	Draft outlines for July 25 hearing with respect to intervention and remand (4.1); review pleadings regarding same (.7); conference with R. LeHane (KDW) regarding same (.1).	RV	4.90	3430.00

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Client 029142

Matter 0013

August 4, 2022

Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/22/22	Revise pleading and exhibits index for July 25 hearing.	PAW	1.20	840.00
07/22/22	Review (.3) and further revise (.3) talking points on examiner motion for July 25 hearing.	LSS	0.60	531.00
07/23/22	Continue drafting remand and lift stay outlines for July 25 hearing (2.1); correspondence with R. LeHane (KDW) regarding same (.1).	RV	2.20	1540.00
07/24/22	Continue preparing for July 25 hearing (3.2); strategy conference with R. Vohra (KDW) regarding same (.3).	RLL	3.50	3150.00
07/24/22	Revise remand and lift stay outlines for July 25 hearing (.7); telephone calls with R. LeHane (KDW) regarding same (.3); update intervention outline (1.2); follow up research regarding same (.6).	RV	2.80	1960.00
07/25/22	Call with D. Cica (CC) and R. Vohra (KDW) in preparation for today's hearing (.2); follow up conference with R. Vohra (KDW) (.1); continue preparation for same (2.9); call with J. Adams (KDW) in advance of hearing (.3); participate in omnibus hearing on remand, lift stay and examiner motions (3.7).	RLL	7.20	6480.00
07/25/22	Confer with R. LeHane (KDW) in advance of today's hearing (.3); review updated filings for today's hearing (.2); update from R. LeHane and R. Vohra (both KDW) following hearing (.2).	JRA	0.70	630.00

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Client 029142
Matter 0013
August 4, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/25/22	Update intervention talking points for today's hearing (1.2); follow up research regarding same (.7); telephone conference with D. Cica (CC) and R. LeHane (KDW) regarding today's hearing (.2); conference with R. LeHane (KDW) regarding same (.1); attend and participate at hearing (3.7).	RV	5.90	4130.00
07/25/22	Revise index of LVDF filings (.3); circulate LVDF opposition to committee motion to intervene in adversary proceeding along with summary and cases cited (.8); email summary of Horsfall retention filings to R. LeHane (KDW) in preparation of hearing (.4).	PAW	1.60	1120.00
Total Services for this Matter:				32,052.00
Total this Invoice				\$32,052.00

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Client 029142
Matter 0013
August 4, 2022
Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.10	900.00	\$1,890.00
LSS	Schlüssel, Lauren	5.00	885.00	4,425.00
MMV	Vicinanza, Marie M	0.20	335.00	67.00
PAW	Weintraub, Philip A	4.50	700.00	3,150.00
RLL	LeHane, Robert L	12.50	900.00	11,250.00
RV	Vohra, Ravi	16.10	700.00	11,270.00

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175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853057

029142 Front Sight Management Committee
0016 Other Contested Matters

Account Summary And Remittance Form

Legal Services:	\$48,204.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$48,204.50

Terms: Payment Due on or Before September 3, 2022

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Client 029142
Matter 0016 Other Contested Matters

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Update research on standard for appointment of an examiner.	ERM	0.90	\$270.00
07/01/22	Analyze motion to appoint an examiner (.3); review research from E. Maloof (KDW) regarding mandatory nature of appointment under section 1104(c) (.3).	LSS	0.60	531.00
07/05/22	Review research from E. Maloof (KDW) regarding standard for appointment of examiner (.4); outline additional response points (.3); instructions to L. Schlusel (KDW) on same (.3).	JRA	1.00	900.00
07/05/22	Continue research on opposition to examiner appointment per further instructions from L. Schlusel (KDW) (2.8); discuss additional case precedent with L. Schlusel (KDW) (.3).	ERM	3.10	930.00
07/05/22	Review summary of LVDF litigation counterclaims from P. Weintraub (KDW) (.6); draft outline of objection to examiner motion (.7); draft background section of objection to LVDF motion to appoint examiner (1.1); review transcript of oral ruling on DIP in	LSS	3.30	2920.50

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Client 029142
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Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/06/22	connection with same (.6); conference with E. Maloof (KDW) regarding additional research needed on examiner appointment (.3). Further research on case precedent on opposition to examiner motion.	ERM	4.90	1470.00
07/06/22	Continue to draft background section of objection to LVDF examiner motion (1.6); begin draft of legal argument regarding discretionary appointment of an examiner (2.2); begin draft argument regarding committee as fiduciary to undertake investigation (1.1) and lack of funding to pay examiner (.7); review additional research from E. Maloof (KDW) responsive to open questions (.3).	LSS	5.90	5221.50
07/07/22	Analyze examiner precedent relating to fraud allegations (1.0); Discuss case analysis with L. Schlüssel (KDW) (.2)	ERM	1.20	360.00
07/07/22	Continue to draft background section of objection to examiner motion to incorporate DIP hearing results (.9); continue to draft legal background for objection regarding discretionary nature of examiner appointment (.8); revise same (.6); continue to draft argument section of objection to examiner motion, including lack of evidence (1.1), role of committee (1.3), cost of examiner (.9) and litigation tactic by LVDF (2.1); further review	LSS	11.70	10354.50

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Front Sight Management Committee
Client 029142
Matter 0016
August 4, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	caselaw provided by E. Maloof (KDW) in support of objection (.7); conference with E, Maloof (KDW) regarding additional research needed in connection with same (.2); review additional case law in support of examiner opposition (.3); review draft opposition to examiner motion from S. Sefflin (BG); begin draft of preliminary statement (1.6); revise same (1.2).			
07/07/22	Review and comment on revised draft UCC opposition (.7) and review debtor response to LVDF examiner motion (.2);	RLL	0.90	810.00
07/08/22	Review and revise draft response to LVDF motion to appoint examiner (1.5); confer with J. Adams (.2) and L. Schlusel (.2) (both KDW) regarding same.	RLL	1.90	1710.00
07/08/22	Preliminary review of draft objection to LVDF examiner motion (.7); follow up research on standard (1.0); outline comments to same (.5); conference with R. LeHane (KDW) regarding same (.2).	JRA	2.40	2160.00
07/08/22	Conference with R. LeHane (KDW) regarding comments to committee objection to appointment of examiner (.2); begin revisions to fact section (.8); further review ResCap decision (.9); revise draft legal section to incorporate additional analysis of ResCap	LSS	6.20	5487.00

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Client 029142
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Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/09/22	decision (1.3); revise same (.7); revise draft argument on committee as estate representative (.9) and litigation tactic by LVDF (1.4). Preliminary review of draft application to shorten time and opposition to LVDF remand (.3) and lift stay (.3) motions; confer with J. Adams (KDW) regarding same (.2); correspondence with R. Vohra (KDW) (.3) regarding same; review and revise opposition to examiner motion (1.5); confer with L. Schlüssel (KDW) regarding same (.3); review case law regarding appointment of examiner and intervention (.7); brief review of draft motion to intervene in adversary proceeding (.3); confer with L. Schlüssel (KDW) regarding same (.2).	RLL	4.10	3690.00
07/09/22	Confer with R. LeHane (KDW) regarding review of UCC response to LVDF examiner motion.	JRA	0.20	180.00
07/09/22	Continue to draft argument section to objection to motion to appoint examiner (3.1); revise preliminary statement in connection with same (2.1); conference with R. LeHane (KDW) regarding comments to same (.3); follow-up conference with R. LeHane (KDW) regarding same (.2).	LSS	5.70	5044.50
07/10/22	Review revised draft of objection to LVDF	JRA	2.10	1890.00

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Client 029142
Matter 0016
August 4, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/10/22	examiner motion (.2); outline additional comments to same (.2); review further revised draft incorporating R. LeHane (KDW) comments (.3); revise same (1.4). Correspondence with R. LeHane (KDW) regarding additional comments to examiner objection and process for circulating to committee with other draft pleadings (.2); review revised draft of examiner objection from J. Adams (KDW) (.3); further revise same (.4).	LSS	0.90	796.50
07/11/22	Review and edit objection to examiner motion (.8); conferences regarding same with J. Adams (.2) and L. Schlusel (.2) (both KDW),	RLL	1.20	1080.00
07/11/22	Review comments from D. Cica (CC) to final draft of UCC objection to motion to appoint examiner (.1); confer with R. LeHane (KDW) regarding same (.2).	JRA	0.30	270.00
07/11/22	Correspond with L. Schlusel (KDW) regarding comments to the examiner motion (.1); review same (.1); incorporate same (.1); correspond with S. Sefflin and S. Gubner (both BGL) regarding same (.1); correspond with D. Cica and T. O'Steen (both of CC) regarding same (.1).	RV	0.50	350.00
07/11/22	Review final versions of objection to examiner (.3); conference with R. LeHane (KDW)	LSS	1.10	973.50

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Matter 0016
August 4, 2022
Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding same (.2); revise same (.2); emails with D. Cica (CC) regarding same (.2); email to R. Vohra (KDW) regarding finalizing same for filing (.2).			
07/12/22	Review debtor's objection to LVDF motion to appoint an examiner.	JRA	0.30	270.00
07/18/22	Review LVDF reply to objections to motion to appoint examiner.	JRA	0.30	270.00
07/19/22	Review reply filed by LVDF in further support of examiner motion.	LSS	0.30	265.50
	Total Services for this Matter:			48,204.50
	Total this Invoice			\$48,204.50

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<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
ERM	Maloof, Emily R	10.10	300.00	\$3,030.00
JRA	Adams, Jason	6.60	900.00	5,940.00
LSS	Schlussel, Lauren	35.70	885.00	31,594.50
RLL	LeHane, Robert L	8.10	900.00	7,290.00
RV	Vohra, Ravi	0.50	700.00	350.00

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Invoice No. 2853064

029142 Front Sight Management Committee
0018 Lender Litigation

Account Summary And Remittance Form

Legal Services:	\$57,434.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$57,434.00

Terms: Payment Due on or Before September 3, 2022

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August 4, 2022
Invoice No. 2853064

Client 029142
Matter 0018 Lender Litigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Review state court amended complaint against LVDF (.9); review LVDF counter complaint (.8); draft state court litigation timeline (1.1); draft LVDF factual timeline (1.6); research LVDF counterclaims (.8); draft chart summarizing counterclaims (1.0).	PAW	6.20	\$4340.00
07/03/22	Review debtor's Rule 2004 motions regarding LVDF and Dziubla (.2); draft summaries of same for KDW team (.4).	PAW	0.60	420.00
07/04/22	Revise chart of LVDF counterclaims (.3); email with KDW team regarding LVDF counterclaims and responses to LVDF filings (.3).	PAW	0.60	420.00
07/05/22	Preliminary analysis of LVDF litigation overview from P. Weintraub (KDW) and counter claim impact on estate claims.	RLL	0.70	630.00
07/05/22	Review P. Weintraub (KDW) summary of state court claims in connection with removed action and response to stay relief and remand (.4); preliminary review of new filings from debtor in adversary to assess next steps in review (.2).	JRA	0.60	540.00

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Front Sight Management Committee
Client 029142
Matter 0018
August 4, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/05/22	Preliminary review of remand pleadings.	RV	0.40	280.00
07/06/22	Follow up correspondence with L. Schlusel (KDW) on preparation of joinder papers for response to lift stay and remand (.2); research regarding intervention (.2) and follow up correspondence (.2) with local counsel on same.	JRA	0.60	540.00
07/06/22	Call with D. Cica (CC) and L. Schlusel (KDW) regarding response to remand and lift stay motions (.3); follow-up call with L. Schlusel (KDW) regarding same (.1); begin research regarding motions to intervene under section 1109(b) and Rule 24 (3.6); further call with L. Schlusel (KDW) regarding same (.1).	RV	4.10	2870.00
07/06/22	Conference with R. Vohra (KDW) and D. Cica (CC) regarding joinder to debtor's objection to LVDF motion for remand and stay relief (.3); follow-up conference with R. Vohra (KDW) regarding same (.1); review email from D. Cica (CC) regarding ability of committee to reply to remand in adversary proceeding (.1); brief research regarding same (.4); follow-up conference with R. Vohra (KDW) regarding same (.1).	LSS	1.00	885.00
07/07/22	Preliminary review of debtor motion for order confirming terminating sanctions orders are void (.5); conference with R. Vohra and L.	JRA	2.20	1980.00

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Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	Schlüssel (both KDW) regarding same and intervention in adversary (.2); review follow up research on intervention from local counsel (.2); review debtor rule 2004 requests (.3); instructions to P. Weintraub (KDW) on litigation review (.2); follow up correspondence on UCC intervention and drafting pleadings with respect to same (.3); review (.1) and revise (.1) R. Vohra (KDW) email to debtor and LVDF on consent to intervention; follow up research intervention (.3).			
07/07/22	Conference with P. Weintraub (KDW) regarding categorization of state court dockets in pending litigation between Front Sight and LVDF (.5); download and categorize dockets for future reference (4.7).	SA	5.20	1534.00
07/07/22	Review emails from D. Cica (CC) and J. Adams (KDW) regarding committee standing in adversary proceeding (.2); emails with D. Cica (CC) (.2) regarding intervention in adversary proceeding.	RLL	0.40	360.00
07/07/22	Conference with J. Adams and R. Vohra (each of KDW) regarding process for committee intervention and strategy regarding same.	LSS	0.20	177.00
07/07/22	Continue research regarding committee intervention under 1109(b) (.5); correspond with D. Cica (CC) regarding same; conference	RV	1.00	700.00

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Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/07/22	with J. Adams and L. Schlusel (both of KDW) regarding same (.2); draft email to LVDF and debtor regarding consent to intervention (.2); correspond with B. Shapiro (counsel to LVDF) and S. Gubner (BGL) regarding same (.1). Confer with S. Alceus (KDW) regarding collection and indexing of LVDF state court lawsuit docket.	PAW	0.50	350.00
07/08/22	Continue download and categorizing state court LVDF litigation dockets for review.	SA	5.00	1475.00
07/08/22	Conduct further research regarding intervention under Rule 24 in the Ninth Circuit (1.4); begin drafting committee intervention motion for LVDF litigation (2.2); review pleadings in connection with same (.6); review drafts of oppositions to the lift stay motion and remand motion from local counsel (.2).	RV	4.40	3080.00
07/08/22	Review debtor notice of 2004 exams of LVDF (.2) and Dziubla (.2); review debtor motion for determination that termination sanctions order violated stay and is void (.5); draft preliminary outline of response to same (.3); review case law regarding intervention in adversary proceedings as of right (.5); review debtor motion for determination of sanctions order as void (.4); review supporting declaration of S. Gubner and attached correspondence (.7).	RLL	2.80	2520.00

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Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/09/22	Follow up correspondence with B. Shapiro (counsel to LVDF) and S. Gubner (BGL) regarding consent to intervention or order shortening time (.1); continue drafting intervention motion (3.3) and proposed order (.3); conduct further research regarding Rule 24 intervention standard in Ninth Circuit (.5); review draft opposition to lift stay (.6); revise same (.7); review draft opposition to remand motion (.8); revise same (.7); correspond with KDW team regarding same (.2); review correspondence from B. Shapiro (counsel to LVDF) regarding intervention (.1); correspond with KDW team regarding same (.1).	RV	7.40	5180.00
07/09/22	Brief review of draft motion from R. Vohra (KDW) for committee intervention.	LSS	0.30	265.50
07/10/22	Review (.2) and provide comments (.4) to motion to intervene in LVDF adversary; correspondence with R. Vohra (KDW) regarding same (.1).	JRA	0.70	630.00
07/10/22	Review draft opposition to remand (.4) and lift stay (.3) from D. Cica, incorporating R. Vohra (KDW) comments (CC): revise same (.4).	LSS	1.10	973.50
07/11/22	Upload relevant adversary case proceedings for P. Weintraub (KDW).	SA	1.50	442.50
07/11/22	Review comments from D. Cica (CC) to motion to intervene and oppositions to lift stay	JRA	0.60	540.00

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Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/11/22	and remand (.3); confirm final drafts of UCC responses to remand and lift stay and motion to intervene in advance of filing (.3). Confer with L. Schlusel (KDW) regarding remand motion and stay relief motion (.2); revise committee intervention motion (.3); revise opposition to remand (.2); correspond with S. Seflin and S. Gubner (both of BGL) regarding same (.1); review comments from S. Seflin (BGL) to intervention motion (.2); correspond with R. LeHane and L. Schlusel (both of KDW) regarding same (.1); incorporate same (.2); correspond with D. Cica and T. O'Steen (both of CC) regarding order shortening time and final pleadings to be filed (.3).	RV	1.60	1120.00
07/11/22	Revise opposition to remand motion (.3) and stay relief motion (.5) conference with R. Vohra (KDW) regarding finalizing same for filing (.2).	LSS	1.00	885.00
07/12/22	Review the following pleadings filed last night with respect to LVDF's motion: debtor objection to lift stay (.2) debtor's objection to remand (.3), debtor's motion to strike Dziubla joinder to remand motion (.1), and Piazza joinders to opposition to lift stay (.1) and remand (.2).	JRA	0.90	810.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/12/22	Review Piazza response and objection to LVDF motion to remand (.3); email and call to G. Garman (GG) counsel to Piazza, regarding remand and examiner motions (.2).	RLL	0.50	450.00
07/12/22	Continue uploading and summarizing LVDF state court litigation dockets for P. Weintraub (KDW).	SA	4.60	1357.00
07/13/22	Continue uploading adversary proceeding documents for P. Weintraub (KDW).	SA	0.40	118.00
07/14/22	Call and email to counsel to LVDF regarding investigation of insiders (.2); strategy conference with J. Adams (KDW) regarding prep for hearing on remand, lift stay and examiner motions (.2).	RLL	0.40	360.00
07/14/22	Conference with R. LeHane (KDW) regarding status of LVDF matters for hearing, preparation for same.	JRA	0.20	180.00
07/14/22	Continue uploading state court documents.	SA	2.60	767.00
07/14/22	Conference with P. Weintraub (KDW) regarding organization of litigation documents (.9); begin organizing and labeling filings from litigation (.6).	DM	1.50	450.00
07/14/22	Conferences with D. McAuliffe (KDW) regarding organizing and indexing Front Sight v LVDF state court docket as uploaded to adversary proceeding (.9); review downloaded .pdfs related to same (.4).	PAW	1.30	910.00

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Page 8

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/15/22	Strategy conference with P. Weintraub (KDW) regarding LVDF construction loan related claims (.2); review summary of same (.6); emails with D. Cica (CC) regarding status of OTC shortening time for hearing on motion to intervene (.2).	RLL	1.00	900.00
07/15/22	Continue organizing state court litigation files.	DM	8.50	2550.00
07/15/22	Call with R. LeHane (KDW) regarding LVDF causes of action.	PAW	0.90	630.00
07/18/22	Review entered order and notice setting hearing on motion to intervene (.1); email and call with B. Shapiro (Shapiro Law) counsel to LVDF, regarding examiner, remand and automatic stay motions (.3); review schedule of 2004 examinations (.2); strategy conference with J. Adams (KDW) regarding same (.2); emails with A. Champion, counsel to Dziubla, regarding state court protective order (.1); initial review of protective order (.2).	RLL	1.10	990.00
07/18/22	Review LVDF replies to stay relief objections (.3) and in further support of motion for remand (.2); review Piazza motion to reconsider sanctions order (.4); conference with R. LeHane (KDW) regarding discussion with counsel for LVDF, settlement concepts and access to information (.2); review form of protective order in state court action for	JRA	1.40	1260.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/18/22	incorporation in adversary (.3). Continue organizing and labeling state court litigation files (5.1); confer with P. Weintraub (KDW) regarding state court orders entered (.6).	DM	5.70	1710.00
07/18/22	Continue uploading remaining state court litigation files.	SA	2.30	678.50
07/18/22	Calls with D. McAuliffe (KDW) regarding search of state court docket for entered orders and protective orders.	PAW	0.60	420.00
07/19/22	Review reply filed by LVDF in further support of motion to remand (.4) and motion to terminate stay (.3).	LSS	0.70	619.50
07/19/22	Organize state court summary judgment motions and orders.	DM	2.30	690.00
07/19/22	Review LVDF replies to opposition to examiner motion (.4); opposition to motion to remand (.4).	RLL	0.80	720.00
07/20/22	Follow up correspondence with R. LeHane (KDW) regarding LVDF status, information sharing and protective order.	JRA	0.20	180.00
07/20/22	Review LVDF reply to UCC motion to intervene in adversary proceeding.	RLL	0.30	270.00
07/20/22	Review opposition to committee intervention motion and attached unreported decision in support (.7); circulate summary of same to KDW team (.2).	PAW	0.90	630.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/21/22	Analyze LVDF objection to UCC intervention motion (.4); follow up correspondence with KDW team regarding not requiring a formal response and preparation for argument (.2).	JRA	0.60	540.00
07/21/22	Review letter from S. Gubner (BG) to counsel to Dziubla, A. Champion, regarding response to 2004 subpoenas and document requests (.5); review LVDF reply and exhibits in support of motion to terminate automatic stay (8).	RLL	1.30	1170.00
07/25/22	Review status report from debtor regarding 2004 discovery dispute with LVDF (.5) and LVDF response to same (.4).	LSS	0.90	796.50
07/25/22	Correspondence with R. LeHane (KDW) and D. Cica (CC) regarding potential response on terminating sanctions motions.	JRA	0.20	180.00
07/26/22	Strategy conference with J. Adams (KDW) regarding litigation, next steps.	RLL	0.30	270.00
07/26/22	Strategy conference with R. LeHane (KDW) regarding litigation status and next steps, including potential responses related to terminating sanction motions filed by debtor and individuals (.3); follow up correspondence with P. Weintraub (KDW) regarding same (.1); correspondence with B. Shapiro (counsel for LVDF) regarding LVDF concerns on debtor identification of creditors (.2).	JRA	0.60	540.00
07/28/22	Correspondence with L. Schluskel (KDW)	JRA	0.20	180.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/28/22	regarding debtor's request for assistance on deed of trust analysis (.1); follow up on same to confirm need and approval (.1). Correspond with L. Schlussel (KDW) regarding draft protective order (.2); review legacy protective order between litigation parties (.2); review precedent (.3); draft same (2.9).	RV	3.60	2520.00
07/29/22	Internal correspondence on LVDF deed of trust review process (.2); follow up correspondence from S. Sefflin (BGL) regarding analysis of LVDF loan closing statement (.1); review same (.2).	JRA	0.50	450.00
Total Services for this Matter:				57,434.00
Total this Invoice				\$57,434.00

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DM	McAuliffe, Daniel	18.00	300.00	\$5,400.00
JRA	Adams, Jason	9.50	900.00	8,550.00
LSS	Schluskel, Lauren	5.20	885.00	4,602.00
PAW	Weintraub, Philip A	11.60	700.00	8,120.00
RLL	LeHane, Robert L	9.60	900.00	8,640.00
RV	Vohra, Ravi	22.50	700.00	15,750.00
SA	Alceus, Sherlly	21.60	295.00	6,372.00

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ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

August 4, 2022
Invoice No. 2853063

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$2,247.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,247.00

Terms: Payment Due on or Before September 3, 2022

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Invoice No. 2853063Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	Emails with P. Huygens (Province) and S. Gubner (BGL) regarding revised and updated budget.	RLL	0.20	\$180.00
07/08/22	Call with S. Gubner regarding 2004 motions and intervention in LVDF adversary proceeding.	RLL	0.30	270.00
07/11/22	Call with S. Sefflin (BG) regarding LVDF litigation, outline of plan and status of DS preparation (.4); call with S. Gubner (BG) regarding remand, intervention substitution strategy regarding LVDF claims (.2).	RLL	0.60	540.00
07/13/22	Call with T. Pilatowicz, counsel to Piazza regarding response to remand and examiner motions.	RLL	0.20	180.00
07/18/22	Update J. Adams (KDW) regarding budget discussions with BG and Province (.2); email with S. Gubner (BGL) and P. Huygens (Province) (.1) and telephone call with S. Gubner (BGL) regarding same (.2).	RLL	0.50	450.00
07/25/22	Call with S. Gubner (BGL) regarding LVDF discovery litigation, settlement discussions,	RLL	0.20	180.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/27/22	plan process and exit strategy. Correspondence with L. Schlusel (KDW) and S. Seflin (BGL) regarding insider analysis and potential UCC meeting with the debtor.	JRA	0.20	180.00
07/29/22	Correspondence with P. Huygens (Province) regarding case status, review of LVDF perfection documents.	JRA	0.10	90.00
07/29/22	Email to S. Seflin (BGL) regarding upcoming Meacher and LVDF depositions.	LSS	0.20	177.00
Total Services for this Matter:				2,247.00
Total this Invoice				\$2,247.00

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<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.30	900.00	\$270.00
LSS	Schlüssel, Lauren	0.20	885.00	177.00
RLL	LeHane, Robert L	2.00	900.00	1,800.00

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August 4, 2022
Invoice No. 2853062

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$1,890.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,890.00

Terms: Payment Due on or Before September 3, 2022

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Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
07/15/22	Review outline of claims against insiders identified in LVDF litigation and proposed treatment of same.	RLL	0.70	\$630.00
07/20/22	Review 2004 exam motion and subpoena for Meacher.	RLL	0.50	450.00
07/28/22	Preliminary review of insider analysis conducted by debtor (.3) and assess follow up diligence for use in discussions regarding insider plan contribution (.2).	JRA	0.50	450.00
07/29/22	Further analyze Province analysis of insider contributions and transfers (.3); prepare follow up questions on same (.1).	JRA	0.40	360.00
Total Services for this Matter:				1,890.00
Total this Invoice				\$1,890.00

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Client 029142
Matter 0020
August 4, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.90	900.00	\$810.00
RLL	LeHane, Robert L	1.20	900.00	1,080.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY **

RUN DATE: August 4, 2022 16:20:34

DATE THRU: July 31, 2022

Page: 4

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

Prebill #: 1817194

FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
06997	Schlüssel , L.S.	06/13/22	Loopup Invoice#:338709;Invoice Date:06/30/2022;Loopup caller: Lauren Schlüssel;Call date: 6/13/2022 3:18:00 PMTelephone	0.32	H T W	8784564
07036	Adams , J.R.	06/14/22	Loopup Invoice#:338709;Invoice Date:06/30/2022;Loopup caller: Jason Adams;Call date: 6/14/2022 9:00:00 PMTelephone	34.29	H T W	8784575
06997	Schlüssel , L.S.	06/21/22	Loopup Invoice#:338709;Invoice Date:06/30/2022;Loopup caller: Lauren Schlüssel;Call date: 6/21/2022 11:59:00 AMTelephone	9.59	H T W	8784612
06997	Schlüssel , L.S.	06/22/22	Loopup Invoice#:338709;Invoice Date:06/30/2022;Loopup caller: Lauren Schlüssel;Call date: 6/22/2022 11:56:00 AMTelephone	0.12	H T W	8784622
06997	Schlüssel , L.S.	06/22/22	Loopup Invoice#:338709;Invoice Date:06/30/2022;Loopup caller: Lauren Schlüssel;Call date: 6/22/2022 2:59:00 PMTelephone	17.61	H T W	8784630
06997	Schlüssel , L.S.	07/06/22	Westlaw Research	131.27	H T W	8785088
07979	Vohra , R.	07/06/22	Lexis Research	33.99	H T W	8785408
07979	Vohra , R.	07/06/22	Lexis Research	124.63	H T W	8785410
07979	Vohra , R.	07/07/22	Lexis Research	56.65	H T W	8785411
07979	Vohra , R.	07/08/22	Lexis Research	33.99	H T W	8785409
07979	Vohra , R.	07/09/22	Lexis Research	124.62	H T W	8785412
07979	Vohra , R.	07/25/22	Lexis Research	11.34	H T W	8785413

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RUN DATE: August 4, 2022 16:20:34

DATE THRU: July 31, 2022

Page: 5

Billing Timekeeper: 06284 - LeHane, Robert L

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029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges/Disbursements

<u>Atty ID</u>	<u>Attorney</u>	<u>Date</u>	<u>Description</u>	<u>Bill Amount</u>	<u>Disp.</u>	<u>Disb Id</u>
				Totals:	\$578.42	

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RUN DATE: August 4, 2022 16:20:34

DATE THRU: July 31, 2022

Page: 7

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

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FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges Summary

Amount	Disp
61.93	H T W
131.27	H T W
385.22	H T W
578.42	

000204 Telephone

000254 Westlaw Research

000256 Lexis Research

Total

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855886

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$3,882.00
Disbursements and Other Charges:	\$192.10

Total Amount Due: \$4,074.10

Terms: Payment Due on or Before October 14, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
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September 14, 2022
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Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/03/22	Outline immediate action items to address based on proposed delayed plan timeline.	JRA	0.30	\$270.00
08/07/22	Correspondence with R. LeHane (KDW) on case status.	JRA	0.20	180.00
08/09/22	Review updated case tasks, upcoming critical dates and work stream assignment chart.	RLL	0.50	450.00
08/16/22	Review current task list (.2); assess follow up (.2).	JRA	0.40	360.00
08/17/22	Confer with J. Adams and L. Schlusel (both KDW) regarding work streams, exit strategy and staffing.	RLL	0.40	360.00
08/17/22	Prepare for internal team conference, including review of my outline of open case issues and insider transfer document from debtor (.5); conference with R. LeHane and L. Schlusel (both KDW) regarding case status, next steps (.4).	JRA	0.90	810.00
08/17/22	Conference with R. LeHane and J. Adams (both KDW) regarding status of various work streams and strategy for moving forward.	LSS	0.40	354.00
08/22/22	Confer with L. Schlusel (KDW) regarding	RLL	0.20	180.00

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Front Sight Management Committee
Client 029142
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September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	coordination of calls with UCC and debtor professionals.			
08/22/22	Conference with R. LeHane (KDW) regarding various work streams and status of same.	LSS	0.20	177.00
08/29/22	Create sharepoint site and upload due diligence documents requested by committee.	MMV	0.60	201.00
08/30/22	Review outstanding tasks list and open matters (.3); review internal follow up list (.2); internal follow up on next steps (.1).	JRA	0.60	540.00

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Front Sight Management Committee
Client 029142
Matter 0001
September 14, 2022
Page 3

Total Services for this Matter: 3,882.00

Other Charges:

Pacer \$192.10

Total Other Charges for this Matter: 192.10

Total this Invoice \$4,074.10

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Front Sight Management Committee
 Client 029142
 Matter 0001
 September 14, 2022
 Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.40	900.00	\$2,160.00
LSS	Schluskel, Lauren	0.60	885.00	531.00
MMV	Vicinanza, Marie M	0.60	335.00	201.00
RLL	LeHane, Robert L	1.10	900.00	990.00

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Front Sight Management Committee
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175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855887

029142 Front Sight Management Committee
0002 Pleadings Review

Account Summary And Remittance Form

Legal Services:	\$6,600.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$6,600.00

Terms: Payment Due on or Before October 14, 2022

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September 14, 2022
Invoice No. 2855887

Client 029142
Matter 0002 Pleadings Review

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Review P. Weintraub (KDW) summary of Friday pleadings.	JRA	0.20	\$180.00
08/01/22	Summarize for KDW team July 29 filings including, redline of interim comp procedures, supplemental Horsfall declaration, Dundon and KDW retention orders, and LVDF motion to quash 2004 exams and subpoenas and the declarations in support thereof.	PAW	1.80	1260.00
08/01/22	Review correspondence from P. Weintraub (KDW) regarding discovery pleadings filed.	RV	0.10	70.00
08/19/22	Review P. Weintraub (KDW) summary of pleadings filed on August 18 by the debtor and LVDF and underlying pleadings.	JRA	0.70	630.00
08/19/22	Summary August 18 filings including the debtor's opposition to the motion to quash, LVDF opposition to the reconsideration motion and opposition to confirming terminating sanctions order is void, and Shapiro opposition to same.	PAW	2.80	1960.00
08/26/22	Review P. Weintraub (KDW) summary of pleadings filed in adversary on August 25 (.4);	JRA	0.60	540.00

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Front Sight Management Committee
 Client 029142
 Matter 0002
 September 14, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/26/22	assess need for further analysis (.2). Summary August 25 substantive filings including LVDF reply in support of motion to quash 2004 exams, debtor's filings related to terminating sanctions order and violations of the automatic stay and Piazza's reply on motion for reconsideration (2.6); prepare sharefile folder for KDW team and UCC members (.2).	PAW	2.80	1960.00
Total Services for this Matter:				6,600.00
Total this Invoice				\$6,600.00

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Front Sight Management Committee
 Client 029142
 Matter 0002
 September 14, 2022
 Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.50	900.00	\$1,350.00
PAW	Weintraub, Philip A	7.40	700.00	5,180.00
RV	Vohra, Ravi	0.10	700.00	70.00

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 NEW YORK, NEW YORK 10007
 (212) 808-7800

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ACCOUNT NAME:KELLEY DRYE & WARREN LLP
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855888

029142 Front Sight Management Committee
0003 Retention Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$850.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$850.00

Terms: Payment Due on or Before October 14, 2022

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BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
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c/o Robert LeHane
175 Greenwich Street
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September 14, 2022
Invoice No. 2855888

Client 029142
Matter 0003 Retention Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/30/22	Summary debtor's application to retain Greenberg Traurig.	PAW	0.70	\$490.00
08/31/22	Review P. Weintraub (KDW) summary of Greenberg retention application (.1); review terms of engagement, including purpose (.2); email correspondence with KDW team regarding same, analysis of retention and UCC recommendation (.1).	JRA	0.40	360.00
Total Services for this Matter:				850.00
Total this Invoice				\$850.00

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Front Sight Management Committee
 Client 029142
 Matter 0003
 September 14, 2022
 Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.40	900.00	\$360.00
PAW	Weintraub, Philip A	0.70	700.00	490.00

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September 14, 2022
Invoice No. 2855889

029142 Front Sight Management Committee
0004 Fee Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$10,743.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$10,743.00

Terms: Payment Due on or Before October 14, 2022

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September 14, 2022
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Client 029142
Matter 0004 Fee Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/03/22	Brief review of revised version of interim compensation order following today's hearing to confirm UCC sign off (.1); follow up correspondence with R. Vohra (KDW) and D. Cica (CC) regarding same (.1); review KDW bills for July in connection with preparation of fee reporting under DIP and in connection with first combined monthly fee statement (1.2).	JRA	1.40	\$1260.00
08/04/22	Continue review of KDW July bills in connection with DIP reporting and preparation of combined monthly fee statement.	JRA	1.10	990.00
08/04/22	Correspond with M. Vicinanza (KDW) regarding July fee work sheet.	RV	0.10	70.00
08/05/22	Review KDW July invoices (.2) and prepare July fee worksheet (.5).	MMV	0.70	234.50
08/09/22	Initial review of KDW hours reports and monthly time entries.	RLL	0.30	270.00
08/09/22	Review KDW invoices (.3); review fee work sheet (.9); revise same (.4); revise KDW monthly fee statement (1.4); verify accuracy of all amounts (.6); correspond with L. Schlussel	RV	3.80	2660.00

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Front Sight Management Committee
Client 029142
Matter 0004
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/10/22	(KDW) regarding same (.2). Review draft KDW monthly fee statement (.4) and revise same (.3).	LSS	0.70	619.50
08/10/22	Correspond with L. Schlüssel (KDW) regarding KDW first monthly fee statement.	RV	0.10	70.00
08/11/22	Circulate calendar invites for monthly statements and applications due under the Interim Compensation Order.	RV	0.30	210.00
08/12/22	Further review draft KDW monthly fee statement (.4); conference with E. Reubel (DA) regarding process for monthly fee statement (.1).	LSS	0.50	442.50
08/12/22	Correspond with L. Schlüssel (KDW) regarding revised KDW fee statement (.1); review same (.1).	RV	0.20	140.00
08/15/22	Briefly review draft of KDW combined first monthly fee statement prior to circulation to notice parties.	JRA	0.20	180.00
08/15/22	Review draft Dundon monthly fee statement (.2); revise same (.2); emails with R. Vohra (KDW) regarding finalizing same for service (.1); review proposed redactions from R. Vohra (KDW) regarding Kelley Drye monthly fee statement (.2); email to R. Vohra (KDW) regarding same (.1); follow-up emails regarding finalizing and serving monthly fee statements (.1).	LSS	0.90	796.50

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Front Sight Management Committee
Client 029142
Matter 0004
September 14, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/15/22	Revise Dundon's monthly fee statement (.2); correspond with L. Schlusssel (KDW) regarding same (.3); correspond with J. Adams and R. LeHane (both of KDW) regarding same (.1); correspond with (.2) and telephone call with T. Rizvi (Dundon) regarding same (.1); correspond with D. Cica regarding CC's monthly fee statement (.2); finalize KDW's monthly fee statement (.4); review KDW invoices with respect to confidential and privileged information (1.2); serve Dundon's and KDW's fee statements on notice parties (.2).	RV	2.90	2030.00
08/17/22	Prepare fee tracker for professionals' fees (.3); correspond with R. LeHane, J. Adams and L. Schlusssel (all of KDW) regarding same (.1); correspond with D. Cica (CC) regarding same (.1); correspond with S. Seflin (BGL) regarding same (.1).	RV	0.60	420.00
08/30/22	Review correspondence from D. Cica (CC) regarding objection deadline to fee statement (.1); review interim compensation procedures regarding same (.1); correspond with L. Schlusssel (KDW) regarding same (.1); correspond with E. Reubel (Dundon) regarding same (.1); review invoice for wire information (.1).	RV	0.50	350.00

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September 14, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	Total Services for this Matter:			10,743.00
	Total this Invoice			\$10,743.00

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Front Sight Management Committee
Client 029142
Matter 0004
September 14, 2022
Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.70	900.00	\$2,430.00
LSS	Schluskel, Lauren	2.10	885.00	1,858.50
MMV	Vicinanza, Marie M	0.70	335.00	234.50
RLL	LeHane, Robert L	0.30	900.00	270.00
RV	Vohra, Ravi	8.50	700.00	5,950.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855890

029142 Front Sight Management Committee
0005 Financing and Cash Collateral

Account Summary And Remittance Form

Legal Services:	\$360.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$360.00

Terms: Payment Due on or Before October 14, 2022

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September 14, 2022
Invoice No. 2855890

Client 029142
Matter 0005 Financing and Cash Collateral

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/04/22	Prepare KDW fee/expense report for July 11 through July 31 in accordance with DIP requirements.	JRA	0.20	\$180.00
08/30/22	Correspondence on internal fee report for August in connection with debtor request on DIP reporting.	JRA	0.20	180.00
Total Services for this Matter:				360.00
Total this Invoice				\$360.00

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Front Sight Management Committee
Client 029142
Matter 0005
September 14, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.40	900.00	\$360.00

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855899

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$8,694.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$8,694.00

Terms: Payment Due on or Before October 14, 2022

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September 14, 2022
Invoice No. 2855899

Client 029142
Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/03/22	Review updated claims register for new claim assessment (.3); outline follow up issues related to claims and various membership and reward programs (.5).	JRA	0.80	\$720.00
08/04/22	Conference with T. Pilatowicz (GTG), counsel for Piazza, regarding request for extension of claims filing deadline (.2); confer with S. Seflin (BLG) regarding debtor position on same (.2); follow up call with S. Seflin (BGL) regarding same following call with counsel for Piazza (.1).	JRA	0.50	450.00
08/06/22	Initial review of K. Johnson \$1.1 billion claim (.5); review email from B. Shapiro (Shapiro Law), counsel to LVDF, regarding same (.2).	RLL	0.70	630.00
08/08/22	Email correspondence with B. Shapiro (Shapiro Law), counsel to LVDF, regarding unsecured claims investigation (.2); confer with J. Adams (KDW) regarding same (.2).	RLL	0.40	360.00
08/08/22	Review correspondence from S. Seflin (BGL) responding to LVDF questioning of debtor's analysis of claims (.3); outline follow up issues	JRA	0.70	630.00

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Front Sight Management Committee
Client 029142
Matter 0009
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/09/22	(.2); call with R. LeHane (KDW) on same (.2). Review email analysis from S. Sefflin (BGL) regarding inclusion of certain creditors on top-20 list and claim issues.	LSS	0.40	354.00
08/23/22	Preliminary review of debtor's claims analysis (.5); correspondence with R. LeHane (KDW) regarding same (.2); email with E. Reubel (Dundon) regarding same (.2); review insider claim related to unpaid rent (.3); follow up correspondence with Dundon team on same (.2); conference with L. Schlusser (KDW) regarding same (.2).	JRA	1.60	1440.00
08/23/22	Initial review of claims analysis from Province (.7); emails with E. Reubel (Dundon) regarding same (.2).	RLL	0.90	810.00
08/23/22	Review claims analysis from T. James (Province) (.5); review follow-up analysis from E. Reubel (DA) (.1); emails with E. Reubel and Y. Zhu (each of DA) regarding landlord insider claim (.2); review claim filed by I. Piazza (.1) and insider landlord (.2); conference with J. Adams (KDW) regarding same and debtor objections to overstated claims (.2).	LSS	1.30	1150.50
08/24/22	Review draft of objection from S. Sefflin (BGL) with respect to LVDF claim (.6); prepare notes on same (.3).	JRA	0.90	810.00
08/25/22	Email to L. Schlusser and R. LeHane (both	JRA	0.10	90.00

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Front Sight Management Committee
 Client 029142
 Matter 0009
 September 14, 2022
 Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	KDW) regarding debtor objection to LVDF claim and next steps.			
08/25/22	Continue review of draft objection to LVDF claim (.5); correspondence with J. Adams (KDW) regarding same (.2).	RLL	0.70	630.00
08/26/22	Briefly review draft objection from debtor to LVDF claim.	LSS	0.70	619.50
Total Services for this Matter:				8,694.00
Total this Invoice				\$8,694.00

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Front Sight Management Committee
Client 029142
Matter 0009
September 14, 2022
Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	4.60	900.00	\$4,140.00
LSS	Schluskel, Lauren	2.40	885.00	2,124.00
RLL	LeHane, Robert L	2.70	900.00	2,430.00

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855894

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$11,824.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$11,824.00

Terms: Payment Due on or Before October 14, 2022

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855894

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Prepare for (.4) and participate in (.7) follow up conference call with R. LeHane and L. Schlusser (both KDW) and Dundon team on open plan issues, claims calculation issues related to perks and impact on voting and solicitation, insider analysis status and use for plan settlement negotiations; instructions to L. Schlusser (KDW) on outlining key open issues (.2); review analysis on open issues (.4).	JRA	1.70	\$1530.00
08/01/22	Conference with R. LeHane and J. Adams (both KDW) and E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding open plan issues and impact insider payments, front-sight bucks and other related case issues on same.	LSS	0.70	619.50
08/01/22	Strategy meeting with J. Adams and L. Schlusser (both KDW) and M. Dundon, E. Reubel and R. Tabish (all Dundon) regarding revised plan term sheet and response to same.	RLL	0.70	630.00
08/03/22	Review correspondence from J. Adams (KDW) regarding new plan confirmation timeline.	RV	0.10	70.00
08/19/22	Review LVDF objection and reservations	JRA	0.10	90.00

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Front Sight Management Committee
Client 029142
Matter 0010
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/21/22	regarding current plan and disclosure statement. Review correspondence from S. Seflin (BGL) regarding intent to send proposed email from I. Piazza to membership regarding go-forward membership options (.2); review underlying draft email (.3); review underlying legal precedence from S. Seflin (BGL) regarding analysis of improper solicitation (.2); follow up correspondence with S. Seflin (BGL) regarding equity interest (.1); follow up correspondence with R. LeHane (KDW) regarding same (.2).	JRA	1.00	900.00
08/21/22	Emails (.2) and call (.2) with S. Seflin (BGL) regarding Piazza feedback outreach to members; strategy conference with L. Schlusel (KDW) regarding response to same (.2); review Piazza email to members (.2).	RLL	0.80	720.00
08/21/22	Review email (.2) from S. Seflin (BGL) and proposed letter from Piazza regarding new membership plans (.2); strategy conference with R. LeHane (KDW) regarding same (.2).	LSS	0.60	531.00
08/22/22	Conference with R. LeHane (KDW) regarding Piazza member email regarding potential plan options, next steps to address same (.3); follow up correspondence with R. LeHane (KDW) and debtor's advisors, including S. Seflin and S. Gubner (both BGL) and P. Huygens (Province)	JRA	0.80	720.00

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Front Sight Management Committee
Client 029142
Matter 0010
September 14, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding same, open questions, and request for meeting between committee and debtor (.1); correspondence with E. Reubel (Dundon) regarding debtor ability to track responses (.2); confer with L. Schlusel (KDW) regarding same (.2).			
08/22/22	Calls with J. Adams (.3) and L. Schlusel (.2) (both KDW) regarding response to Piazza request for feedback and plan proposal to members; emails with UCC regarding same (.3).	RLL	0.80	720.00
08/22/22	Strategy conference with R. LeHane (KDW) regarding Piazza letter to members (.2); follow up call with J. Adams (KDW) on same, next steps (.2).	LSS	0.40	354.00
08/23/22	Correspondence with L. Schlusel (KDW) regarding plan status, potential delay and next steps.	JRA	0.20	180.00
08/25/22	Conference with L. Schlusel (KDW) regarding open plan issues, potential voting issues and preparation for next round of plan (.5); review checklist of plan issues in connection with same (.3); review solicitation issues and assess potential options on new membership questions (.5).	JRA	1.30	1170.00
08/26/22	Review update and comment on status report to committee regarding revised plan timeline.	RLL	0.20	180.00

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Front Sight Management Committee
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Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/29/22	Review update from E. Reubel (Dundon) regarding discussion with P. Huygens (PA) on plan status, feasibility issues, insider contribution and next steps (.3); review research on plan classification issues (.5); review (.2) and follow up research (1.0) on claim objections for voting purposes; update outline of potential plan and DS objection issues for discussion with committee (.3).	JRA	2.30	2070.00
08/31/22	Call with L. Schlusel and J. Adams (both KDW) regarding status of plan discussions and response to revised plan and disclosure statement.	RLL	0.40	360.00
08/31/22	Conference with R. LeHane and L. Schlusel (both KDW) regarding plan update from debtor, next steps.	JRA	0.40	360.00
08/31/22	Conference with S. Seflin (BGL) regarding plan process and insider contribution (.3); follow-up conference with R. LeHane and J. Adams (each of KDW) regarding same (.4).	LSS	0.70	619.50
Total Services for this Matter:				11,824.00
Total this Invoice				\$11,824.00

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Front Sight Management Committee
 Client 029142
 Matter 0010
 September 14, 2022
 Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	7.80	900.00	\$7,020.00
LSS	Schlüssel, Lauren	2.40	885.00	2,124.00
RLL	LeHane, Robert L	2.90	900.00	2,610.00
RV	Vohra, Ravi	0.10	700.00	70.00

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September 14, 2022
Invoice No. 2855895

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$14,012.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$14,012.50

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Client 029142
Matter 0011 Committee and Creditor Communications

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Draft email to committee with update regarding motion to quash and other recently filed pleadings.	LSS	0.60	\$531.00
08/01/22	Prepare for and call with committee regarding status and response to binding term sheet.	RLL	0.80	720.00
08/02/22	Confer with L. Schlüssel (KDW) regarding committee questions on LVDF litigation and discovery, motion to quash, and process forward (.2); review responsive emails on questions (.2).	JRA	0.40	360.00
08/02/22	Review email from M. Eagleton (ALM) regarding motion to quash and debtor response to same (.1); confer with J. Adams (KDW) regarding UCC questions on LVDF litigation (.2); email to M. Eagleton (ALM) regarding same (.1).	LSS	0.40	354.00
08/03/22	Update email to UCC regarding modified plan timeline, final bar date reminder, and general next steps (.4); follow up correspondence from D. Streck (UCC member) regarding same, claim deadline and follow up on plan issues	JRA	0.70	630.00

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Front Sight Management Committee
Client 029142
Matter 0011
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/04/22	(.3). Conference with D. Streck (UCC member) regarding case status and claims process.	JRA	0.60	540.00
08/07/22	Correspondence with D. Streck (UCC member) regarding problems with claims filing (.1); instructions to team on review of issue (.1).	JRA	0.20	180.00
08/21/22	Email correspondence with UCC members and Dundon team regarding request to convene UCC meeting to consider draft email from I. Piazza (.2); review correspondence from D. Streck (UCC member) advising that Piazza email has already been sent (.1).	JRA	0.30	270.00
08/21/22	Draft email to committee with update regarding proposed Piazza letter and request for a call.	LSS	0.40	354.00
08/22/22	Follow up correspondence with R. LeHane (KDW) regarding I. Piazza email to members and follow up with UCC (.2); follow up committee email correspondence on same, next call (.1); follow up correspondence from S. Heun (UCC member) regarding same (.1).	JRA	0.40	360.00
08/22/22	Review recent pleadings summary from P. Weintraub (KDW) for inclusion in committee email update (.4); conference with P. Weintraub (KDW) regarding same (.2); draft email to committee regarding upcoming committee call and same (.8).	LSS	1.40	1239.00
08/22/22	Confer with L. Schlüssel (KDW) regarding	PAW	0.40	280.00

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Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/23/22	committee update email summarizing recent pleadings (.2); review same prior to sending (.2). Review notes from R. LeHane (KDW) from debtor call preparatory to drafting talking points for August 24 committee call (.4); draft talking points for August 24 committee call (1.6).	LSS	2.00	1770.00
08/24/22	Review L. Schlusel (KDW) draft talking points for today's UCC call (.4); confer with R. LeHane (KDW) regarding same in advance of committee call (.3).	JRA	0.70	630.00
08/24/22	Review and comment on talking points for UCC call (.3); confer with J. Adams (.3) and L. Schlusel (.2) (both KDW) regarding prep for call; call with UCC and Dundon team (1.2); follow up call with L. Schlusel (KDW) and Dundon team regarding same (.6).	RLL	2.60	2340.00
08/24/22	Review talking points preparatory to committee call (.4); conference with R. LeHane (KDW) preparatory to committee call (.2); participate, together with R. LeHane (KDW), in committee call (1.2); follow-up conference with T. Rizvi (DA) regarding same (.1); further follow-up with R. LeHane (KDW), T. Rizvi and E. Reubel (each of DA) regarding same (.6); email to S. Heun (UCC member) regarding email on	LSS	2.60	2301.00

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Front Sight Management Committee
Client 029142
Matter 0011
September 14, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/26/22	business plan proposal (.1). Review UCC update email on recent pleadings, extension of expected plan timeline and next UCC call prior to circulation.	JRA	0.20	180.00
08/26/22	Review summary of recent pleadings from P. Weintraub (KDW) for committee update email (.4); draft email to committee with case and pleadings update (.7).	LSS	1.10	973.50
Total Services for this Matter:				14,012.50
Total this Invoice				\$14,012.50

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Front Sight Management Committee
Client 029142
Matter 0011
September 14, 2022
Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	3.50	900.00	\$3,150.00
LSS	Schluskel, Lauren	8.50	885.00	7,522.50
PAW	Weintraub, Philip A	0.40	700.00	280.00
RLL	LeHane, Robert L	3.40	900.00	3,060.00

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ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855893

029142 Front Sight Management Committee
0012 Business Operations

Account Summary And Remittance Form

Legal Services:	\$630.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$630.00

Terms: Payment Due on or Before October 14, 2022

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September 14, 2022
 Invoice No. 2855893

Client 029142
 Matter 0012 Business Operations

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/24/22	Review July MOR (.4); cross reference additional questions on same from B. Shapiro (LVDF counsel) email of August 23 (.1); follow up correspondence with Dundon team to inquire about specific issues raised by LVDF with respect to same (.2).	JRA	0.70	\$630.00
Total Services for this Matter:				630.00
Total this Invoice				\$630.00

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Front Sight Management Committee
Client 029142
Matter 0012
September 14, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.70	900.00	\$630.00

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175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855892

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$2,781.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,781.00

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175 Greenwich Street
New York, NY 10007September 14, 2022
Invoice No. 2855892Client 029142
Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Arrange for participation at Wednesday's hearing.	JRA	0.20	\$180.00
08/01/22	Calendar upcoming hearings for KDW team.	RV	0.70	490.00
08/03/22	Review update report from D. Cica (CC) regarding today's hearing.	JRA	0.10	90.00
08/03/22	Correspond with D. Cica (CC) regarding hearing on interim compensation (.1); review order (.1).	RV	0.20	140.00
08/04/22	Follow up with R. Vohra (KDW) on yesterday's hearing and interim comp order.	JRA	0.20	180.00
08/24/22	Review email from S. Seflin (BG) regarding proposed adjournment of disclosure statement hearing (.1); email to S. Seflin (BG) regarding same (.1); follow-up email to E. Reubel (DA) regarding same (.1).	LSS	0.30	265.50
08/26/22	Correspondence with R. LeHane (KDW) regarding upcoming hearing and committee position regarding same.	LSS	0.30	265.50
08/31/22	Strategy conference with J. Adams (KDW) (.2) and prepare for hearing on motions to quash subpoena and find terminating sanctions orders	RLL	0.90	810.00

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Front Sight Management Committee
 Client 029142
 Matter 0013
 September 14, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/31/22	void for violating stay (.7). Conference with R. LeHane (KDW) in preparation for tomorrow's hearing (.2); correspondence with L. Schlussel and M. Vicinanza (both KDW) on appearances for tomorrow's hearing, preparation for same (.2).	JRA	0.40	360.00
Total Services for this Matter:				2,781.00
Total this Invoice				\$2,781.00

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Front Sight Management Committee
Client 029142
Matter 0013
September 14, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.90	900.00	\$810.00
LSS	Schlüssel, Lauren	0.60	885.00	531.00
RLL	LeHane, Robert L	0.90	900.00	810.00
RV	Vohra, Ravi	0.90	700.00	630.00

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175 Greenwich Street
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September 14, 2022
Invoice No. 2855891

029142 Front Sight Management Committee
0016 Other Contested Matters

Account Summary And Remittance Form

Legal Services:	\$2,212.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,212.50

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Invoice No. 2855891

Client 029142
Matter 0016 Other Contested Matters

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/08/22	Review motion for sanctions (.3) and declaration in support (.3) from LVDF to BG Law.	LSS	0.60	\$531.00
08/09/22	Review draft motion from LVDF for sanctions against debtor's counsel (.7) and declaration in support (.4); review emails from S. Sefflin (BG) contradicting same (.2).	LSS	1.30	1150.50
08/17/22	Review notes from D. Cica (CC) regarding D. Meacher deposition.	LSS	0.60	531.00
Total Services for this Matter:				2,212.50
Total this Invoice				\$2,212.50

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Front Sight Management Committee
Client 029142
Matter 0016
September 14, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlusssel, Lauren	2.50	885.00	\$2,212.50

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September 14, 2022
Invoice No. 2855898

029142 Front Sight Management Committee
0018 Lender Litigation

Account Summary And Remittance Form

Legal Services:	\$5,054.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$5,054.00

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ACCOUNT #:135-046110
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New York, NY 10007September 14, 2022
Invoice No. 2855898Client 029142
Matter 0018 Lender Litigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Review summary of docket activity, hearing dates and objection deadline notices in connection with LVDF litigation.	RLL	0.40	\$360.00
08/01/22	Conference with M. Gelade (KDW) regarding LVDF deed of trust (.2); follow-up email to M. Gelade (KDW) regarding same (.1); review analysis of same from M. Gelade (KDW) (.3).	LSS	0.60	531.00
08/01/22	Conference with L. Schlusel (KDW) regarding LVDF deed of trust review (.2); review title and lien search (1.0); prepare summary email of potential issues (.5).	MG	1.70	1173.00
08/22/22	Review debtor opposition to motion to quash 2004 exams (.4); review LVDF opposition to Piazza motion for reconsideration (.4) and motion to find terminating sanctions order void (.4) and supporting declaration of A. Champion (Lovelock) (.1); review opposition of B. Shapiro to debtor's amended motions for sanctions for stay violation (.2).	RLL	1.50	1350.00
08/26/22	Review debtor reply to LVDF opposition to debtor motion to find terminating sanctions	RLL	1.20	1080.00

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Front Sight Management Committee
 Client 029142
 Matter 0018
 September 14, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/30/22	order void (.4); and Piazza reply in support of motion for reconsideration of same order (.4); review supporting affidavits and requests for judicial notice and attached exhibits. (.4). Confer with L. Schlüssel (KDW) regarding access to state court filings uploaded to adversary proceeding docket (.3); review exhibits to bankruptcy court filings and documents uploaded to adversary proceeding in connection with Porter expert report (.5)	PAW	0.80	560.00
Total Services for this Matter:				5,054.00
Total this Invoice				\$5,054.00

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Front Sight Management Committee
Client 029142
Matter 0018
September 14, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlüssel, Lauren	0.60	885.00	\$531.00
MG	Gelade, Melissa	1.70	690.00	1,173.00
PAW	Weintraub, Philip A	0.80	700.00	560.00
RLL	LeHane, Robert L	3.10	900.00	2,790.00

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September 14, 2022
Invoice No. 2855897

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$7,588.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$7,588.50

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September 14, 2022
Invoice No. 2855897

Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Follow up correspondence to S. Seflin (BGL) regarding LVDF loan closing statement and preliminary assessment.	JRA	0.20	\$180.00
08/02/22	Update from L. Schlusel (KDW) following discussion with S. Seflin (BGL) on timing of updated plan and disclosure statement and expected timing on solicitation hearing (.2); confer with L. Schlusel (KDW) on same and timing for follow up requests (.2).	JRA	0.40	360.00
08/02/22	Conference with S. Seflin (BGL) regarding draft protective order, adjournment of disclosure statement hearing and other case issues (.5); follow up conference with J. Adams (KDW) on same (.2)./	LSS	0.70	619.50
08/07/22	Email correspondence with S. Seflin (BGL) regarding response to correspondence from B. Shapiro regarding claims.	RLL	0.40	360.00
08/17/22	Correspondence with R. LeHane and L. Schlusel (both KDW) regarding debtor follow up on diligence and update call (.2); review information list for same (.2).	JRA	0.40	360.00

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Front Sight Management Committee
Client 029142
Matter 0019
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/17/22	Draft email to R. LeHane (KDW) with topics and issues for debtor call.	LSS	0.70	619.50
08/18/22	Confer with L. Schlusssel (KDW) (.1) and email to S. Gubner and S. Seflin (both BGL) and P. Huygens (Province) (.1) regarding meeting to discuss case status and exit strategy.	RLL	0.20	180.00
08/22/22	Correspondence with L. Schlusssel (KDW) and S. Gubner and S. Seflin (both BGL) regarding follow up call.	JRA	0.20	180.00
08/23/22	Review case notes and emails to prepare for debtor call (.4); call with L. Schlusssel (KDW), S. Gubner and S. Seflin (both BGL), P. Huygens (Province) and E. Reubel (Dundon) regarding case status, feedback from members, disclosure statement and plan process, response to insider diligence and analysis of claims and reconciliation and objection next steps (1.5); follow up call with S. Gubner (BGL) regarding status of plan process and discussions.	RLL	2.10	1890.00
08/23/22	Update from L. Schlusssel (KDW) regarding today's call with debtor's advisors.	JRA	0.20	180.00
08/23/22	Review topics and questions preparatory to debtor call (.4); participate, together with R. LeHane (KDW) and E. Reubel (DA) in meeting with debtor's advisors, including S. Seflin, S. Gubner (each of BG), P. Huygens and T. Smith (each of Province) regarding plan	LSS	2.10	1858.50

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Front Sight Management Committee
 Client 029142
 Matter 0019
 September 14, 2022
 Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	process, claims reconciliation, insider investigation and other case issues (1.5); update J. Adams (KDW) following same (.2).			
08/24/22	Draft email to R. LeHane (KDW) with bullet points on debtor follow-up regarding real estate purchases and unsecured equity participation.	LSS	0.60	531.00
08/30/22	Review outstanding diligence requests for debtor (.2); correspondence with L. Schlusel (KDW) and S. Seflin (BGL) regarding same (.1).	JRA	0.30	270.00
Total Services for this Matter:				7,588.50
Total this Invoice				\$7,588.50

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
 LOS ANGELES
 CHICAGO
 HOUSTON

NEW YORK
 STAMFORD
 PARSIPPANY

AFFILIATE OFFICE:
 MUMBAI, INDIA

Front Sight Management Committee
 Client 029142
 Matter 0019
 September 14, 2022
 Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.70	900.00	\$1,530.00
LSS	Schluskel, Lauren	4.10	885.00	3,628.50
RLL	LeHane, Robert L	2.70	900.00	2,430.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
 ATTN: TREASURER'S DEPARTMENT
 3 WORLD TRADE CENTER
 175 GREENWICH STREET
 NEW YORK, NEW YORK 10007
 (212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
 PLEASE INDICATE CLIENT, MATTER AND
 INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855896

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$19,925.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$19,925.00

Terms: Payment Due on or Before October 14, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
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NEW YORK, NEW YORK 10007
(212) 808-7800

KELLEY DRYE & WARREN LLP

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PARSIPPANY

AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

September 14, 2022
Invoice No. 2855896

Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/01/22	Revise protective order (.7); review precedent regarding same (.3); correspond with L. Schlüssel (KDW) regarding same (.1).	RV	1.10	\$770.00
08/01/22	Review draft protective order with LVDF from R. Vohra (KDW) (.8); review samples of other protective orders in connection with same (.6); begin revisions to same (.8).	LSS	2.20	1947.00
08/02/22	Brief review of comments to form of protective order for information sharing from LVDF (.3); follow up correspondence regarding same with L. Schlüssel (KDW) and A. Champion (JL) (.3).	JRA	0.60	540.00
08/02/22	Continue to revise draft protective order from R. Vohra (KDW) (2.2); review (.6) and finalize (.8) same; emails with A. Champion (JL) regarding same (.3).	LSS	3.90	3451.50
08/17/22	Review insider analysis from debtor in connection with initial diligence requests (.6); draft initial diligence requests relating to insider analysis (1.7).	LSS	2.30	2035.50
08/18/22	Review L. Schlüssel (KDW) follow up	JRA	0.80	720.00

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MUMBAI, INDIA

Front Sight Management Committee
Client 029142
Matter 0020
September 14, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	diligence request for insider transactions (.3); provide comments to same (.1); review summary analysis from debtor in connection with same (.2); correspondence with Dundon team regarding supplementing diligence request (.2).			
08/18/22	Review and comment on draft diligence request to insiders (.2); email from E. Reubel (Dundon) regarding same (.1).	RLL	0.30	270.00
08/18/22	Further revise draft insider diligence requests (.3); revise same to incorporate comments from J. Adams (KDW) (.1); email to E. Reubel regarding same (.1).	LSS	0.50	442.50
08/19/22	Follow up correspondence with Dundon team on insider analysis, further diligence.	JRA	0.30	270.00
08/22/22	Review update insider diligence and correspondence with debtor on same.	JRA	0.30	270.00
08/22/22	Conference with E. Reubel (DA) regarding comments to insider investigation diligence requests (.2); revise same (.3); draft follow-up email to A. Champion (JL) regarding draft protective order (.2).	LSS	0.70	619.50
08/23/22	Review minutes of debtor annual meetings.	RLL	0.40	360.00
08/24/22	Review correspondence with Province on populating data room with respect to insider analysis and general availability of information (.2); begin preliminary review of information.	JRA	2.90	2610.00

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Front Sight Management Committee
Client 029142
Matter 0020
September 14, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	including tax returns (1.6) and insider transaction tracking spreadsheet (.3); correspondence with L. Schlussel (KDW) on Dundon team review (.1); brief review of board minutes (.2); brief overview of Piazza personal credit card records (.5).			
08/25/22	Email to E. Reubel (Dundon) regarding status of insider document review and next steps.	JRA	0.30	270.00
08/25/22	Begin review of information provided by T. James (Province) in response to insider diligence requests.	LSS	1.40	1239.00
08/30/22	Conference with P. Weintraub (KDW) regarding adversary proceeding index for information necessary for insider analysis (.4); correspondence with R. LeHane (KDW) regarding same (.1); draft email to S. Seflin (BGL) regarding additional insider information requests (.4).	LSS	0.90	796.50
08/31/22	Review Porter expert report (.9) and deposition transcript (.7) regarding LVDF loan, insider transactions; email correspondence with L. Schlussel and R. LeHane (both KDW) regarding same and follow up with Dundon team (.2).	JRA	1.80	1620.00
08/31/22	Review Porter forensic report regarding Piazza finances, Front Sight solvency and insider transfers.	RLL	0.80	720.00

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Front Sight Management Committee
 Client 029142
 Matter 0020
 September 14, 2022
 Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
08/31/22	Review expert report prepared by J. Porter in connection with state court litigation (.9); email to E. Reubel (DA) regarding same (.2).	LSS	1.10	973.50
Total Services for this Matter:				19,925.00
Total this Invoice				\$19,925.00

KELLEY DRYE & WARREN LLP

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Front Sight Management Committee
Client 029142
Matter 0020
September 14, 2022
Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	7.00	900.00	\$6,300.00
LSS	Schlüssel, Lauren	13.00	885.00	11,505.00
RLL	LeHane, Robert L	1.50	900.00	1,350.00
RV	Vohra, Ravi	1.10	700.00	770.00

PAYMENT BY CHECK:

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ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP
**** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY ****

RUN DATE: September 14, 2022 12:58:20
Billing Timekeeper: 06284 - LeHane, Robert L
 Prebill #: 1820674
029142 - Front Sight Management Committee
0001 - Case Administration

DATE THRU: August 31, 2022

Page: 3
Responsible Timekeeper: 06284 - LeHane, Robert L
 FORMAT 021

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
		08/19/22	Pacer	192.10	H T W	8788049
Totals:				\$192.10		

KELLEY DRYE & WARREN LLP
**** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY ****

RUN DATE: September 14, 2022 12:58:20

DATE THRU: August 31, 2022

Page: 5

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

Prebill #: 1820674

FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges Summary		Amount	Disp
000348	Pacer	192.10	H T W
	Total	192.10	

Exhibit 3**COMPENSATION BY TIMEKEEPER
JUNE 13, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

NAME OF PROFESSIONAL: PARTNERS & SPECIAL COUNSEL	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Robert L. LeHane (Partner)	Bankruptcy	1999	\$900.00	113.3	\$101,970.00
Jason R. Adams (Partner)	Bankruptcy	2000	\$900.00	140.0	\$126,000.00
Melissa L. Gelade (Partner)	Real Estate	2000	\$690.00	1.7	\$1,173.00
Lauren S. Schluskel (Special Counsel)	Bankruptcy	2009	\$885.00	174.5	\$154,432.50
Total Partners & Special Counsel:				429.5	\$383,575.50

NAME OF PROFESSIONAL: SENIOR ASSOCIATES	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Philip A. Weintraub	Bankruptcy	2005	\$700.00	47.3	\$33,110.00
Ravi Vohra	Bankruptcy	2013	\$700.00	68.0	\$47,600.00
Total Associates:				115.3	\$80,710.00

NAME OF PROFESSIONAL: SUMMER ASSOCIATES	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Emily R. Maloof	N/A	N/A	\$300.00	17.2	\$5,160.00
Daniel McAuliffe	N/A	N/A	\$300.00	18.0	\$5,400.00
Total Summer Associates:				35.2	\$10,560.00

NAME OF PROFESSIONAL: PARAPROFESSIONALS	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Marie M. Vicinanza	Bankruptcy	N/A	\$335.00	9.2	\$3,082.00
Sherlly Alceus	Bankruptcy	N/A	\$295.00	21.6	\$6,372.00
Total Summer Associates:				30.8	\$9,454.00

	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners and Special Counsel	\$893.07	429.5	\$383,575.50
Associates & Summer Associates	\$606.45	150.5	\$91,270.00
Paraprofessional	\$306.95	30.8	\$9,454.00
Blended Attorney Rate	\$818.70		
Blended Professionals Rate	\$792.89		
Totals:		610.8	\$484,299.50

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

Category of Timekeeper	Blended Hourly Rate	
	Billed or Collected in 2021 (Excluding Bankruptcy)¹	Billed in this Fee Application
Partner	\$832.96	\$898.60
Special Counsel	\$717.01	\$885.00
Senior Associate (6 years or more years since first admission)	\$623.44	\$700.00
Paraprofessionals	\$310.62	\$306.95
All timekeepers aggregated	\$644.83	\$792.89

¹ Under the UST Guidelines, “preceding year” means “either the applicant’s prior completed fiscal year or a rolling 12 month year.” Kelley Drye’s blended rates reflect work performed in Kelley Drye’s 2021 fiscal year in Kelley Drye’s domestic offices, excluding all data from bankruptcy matters.

Exhibit 4

**KELLEY DRYE EXPENSE SUMMARY
JUNE 13, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

EXPENSE	AMOUNT
Legal Research	\$621.84
Telephone	\$61.93
Pacer	\$192.10
Totals:	\$875.87

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

Case No.: 22-11824-abl Chapter: 11 Hearing Date/Time: 10/24/22 at 9:30 am

Debtor: Front Sight Management LLC

Applicant: Kelley Drye & Warren LLP

Date of Employment: July 29, 2022, effective as of June 13, 2022

Interim Fee Application No. First

Amounts Requested:

Client Approval: Yes No

Fees \$484,299.50

Expenses \$875.87

Total \$485,175.37

Hours 610.8

Blended Rate: \$792.89

Fees Previously Requested: N/A **Awarded:** _____

Expenses Previously Requested: N/A **Awarded:** _____

Total Previously Requested: N/A **Awarded:** _____

Total Amount Paid: \$311,998.17¹

I certify under the penalty of perjury that the above is true.

/s/ Robert L. LeHane
Signature

Date September 23, 2022

¹ Kelley Drye received payment of 80% of fees and 100% of expenses in connection with its combined first monthly fee statement for the period from June 13, 2022 through and including July 31, 2022, which was served on the Reviewing Parties pursuant to the *Order Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals* [Docket No. 318].