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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 DUNDON ADVISERS LLC FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS FINANCIAL ADVISER TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS OF FRONT SIGHT MANAGEMENT LLC FOR
THE PERIOD FROM JUNE 15, 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 Dundon Advisers LLC (“Dundon”), as financial adviser 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 and approval of

¹ Docket No. 318.

1 \$114,167.00 in fees and \$0.00 in expenses incurred during the period from June 15, 2022 through
2 and including August 31, 2022 (the “Application Period”).

3 This Application is made and based upon the following Memorandum of Points and
4 Authorities, the declarations of Mark Eagleton (the “Eagleton Declaration”) and Erica A. Reubel
5 (the “Reubel Declaration”), filed concurrently herewith, the papers and pleadings on file herein,
6 judicial notice of which is respectfully requested, and any argument of counsel at the time of hearing
7 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 Dundon’s first interim application for allowance of compensation and reimbursement of expenses
14 in the Debtor’s chapter 11 case. Dundon seeks payment of 100% of its fees and expenses relating
15 to services rendered during the Application Period subject in all respects to the *Final Order: (I)*
16 *Authorizing Debtor to Obtain Post-Petition Financing, (II) Granting Liens and Administrative*
17 *Expense Claims, (III) Authorizing Debtor’s Use of Cash Collateral, (IV) Modifying the Automatic*
18 *Stay, and (V) Granting Other Related Relief* (the “DIP Order”).²

19 2. This Application sets forth the fees and expenses Dundon incurred as
20 financial adviser to the Committee during the Application Period. Dundon requests allowance of
21 compensation in the amount of \$114,167.00 and reimbursement of expenses in the amount of \$0.00
22 for a total of \$114,167.00 in connection with services provided during the Application Period.

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

25 4. **Exhibit 2** provides itemized time records of the attorneys and
26 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 throughout the duration
4 of this case.

5 **II. JURISDICTION AND VENUE**

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

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

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

13 **III. BACKGROUND**

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

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

24 11. On July 1, 2022, Dundon filed the *Application for Order Authorizing the*
25 *Employment and Retention of Dundon Advisers LLC as Financial Adviser for the Official*
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³ Docket No. 116.

1 *Committee of Unsecured Creditors Effective as of June 15, 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 12. Dundon rendered the following professional legal services to the
5 Committee during the Application Period:

- 6
- 7 a. Assisting in the analysis, review and monitoring of the restructuring process,
8 including, but not limited to an assessment of the unsecured claims pool and
9 potential recoveries for unsecured creditors;
 - 10 b. Developing a complete understanding of the Debtor’s business and its valuations;
 - 11 c. Determining whether there are viable alternative paths for the disposition of the
12 Debtor’s assets (e.g., restructuring, sale) from those proposed by the Debtor;
 - 13 d. Assisting the Committee in identifying, valuing and pursuing estate causes of
14 action;
 - 15 e. Assisting the Committee to address claims against the Debtor and to identify,
16 preserve, value and monetize tax assets of the Debtor;
 - 17 f. Advising the Committee in negotiations with the Debtor and third parties;
 - 18 g. Assisting the Committee in reviewing the Debtor’s financial reports, including, but
19 not limited to, statements of financial affairs and schedules of assets and liabilities;
 - 20 h. Reviewing and providing analysis of potential chapter 11 plan;
 - 21 i. Attending meetings and assisting in discussions with the Committee, the Debtor,
22 and other parties in interest and professionals;
 - 23 j. Presenting at meetings of the Committee, as well as meetings with other key
24 stakeholders and parties; and
 - 25 k. Providing testimony on behalf of the Committee as and when may be deemed
26 appropriate.

27 13. To assist the Court in its review of the fees requested in this Application, Dundon
28 has divided its time entries into the project categories set forth below.

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Business Analysis

⁴ Docket No. 236.

⁵ Docket No. 303.

1 14. The time incurred in this task reflects time spent examining Debtor’s business and
2 strategy, reviewing company projections and forecasts, in concert with Committee Counsel,
3 analyzing monthly operating reports, reviewing transaction documents and negotiating with
4 professionals fees to maximize value to the unsecured creditors. Dundon spent a total of 45.3
5 hours performing services related to Business Analysis and charged fees for these services in the
6 amount of \$30,192.00.

7 **Case Administration**

8 15. The time incurred in this task reflects time spent on the administration of the chapter
9 11 case, including reviewing the docket to remain apprised with the status of the chapter 11 case,
10 reviewing the Interim Compensation Procedures Order, and conducting status calls. Dundon spent
11 a total of 3.4 hours performing services related to Case Administration and charged fees for these
12 services in the amount of \$2,287.00.

13 **Claims Analysis**

14 16. The time incurred in this task code reflects time analyzing (and reviewing the
15 analysis of others) of potential claims upon the debtor’s estates and conferring with parties
16 regarding the same. Dundon spent a total of 2.4 hours performing services related to the Claims
17 Analysis and charged fees for these services in the amount of \$1,689.00.

18 **Court Hearings**

19 17. The time incurred in this task code reflects time spent attending hearings. Dundon
20 spent a total of 2.6 hours performing services related to the Court Hearings task and charged fees
21 for these services in the amount of \$1,184.00.

22 **Committee Member/Professional Meetings & Communications**

23 18. The time incurred in this task reflects time spent conferring with the Debtor’s
24 professionals, Committee members, Committee counsel and internally with other professionals of
25 Dundon regarding this chapter 11 case, including preparing presentations for Committee calls.
26 Dundon spent a total of 29.3 hours performing services related to Meetings and Communications
27 with Committee members and professionals and charged fees for these services in the amount of
28 \$19,925.00.

1 **Investigations**

2 19. The time incurred in this task code reflects time analyzing shareholder distributions
3 over the course of the period from 2018–2021. Dundon spent a total of 11.9 hours performing
4 services related to investigations and charged fees for these services in the amount of \$7,974.00.

5 **Plan and Disclosure Statement**

6 20. The time incurred in this task code reflects time spent analyzing and stress-testing
7 the Debtor’s financial projections in the Debtor’s chapter 11 plan. Dundon spent a total of 65.7
8 hours performing services related to the Claims Analysis and charged fees for these services in the
9 amount of \$44,275.50.

10 **Retention and Fee Applications**

11 21. The time incurred in this task reflects time spent drafting the Retention Application,
12 conferring with counsel regarding the same and preparing the first combined monthly fee
13 statement, which Dundon served on the Reviewing Parties (as defined in the Interim Compensation
14 Order). Dundon spent a total of 7.4 hours performing services related to the Retention and Fee
15 Applications and charged fees for these services in the amount of \$5,645.00.

16 **Sale Process**

17 22. The time incurred in this task reflects time reviewing the stalking horse asset
18 purchase agreement. Dundon spent a total of 0.5 hours performing services related to the Sale
19 Process and charged fees for these services in the amount of \$365.00.

20 **V. ACTUAL AND NECESSARY DISBURSEMENTS**

21 23. Dundon’s out of pocket disbursements during the Application Period total \$0.00.
22 These disbursements and expenses are broken down into categories of charges on **Exhibit 4** of this
23 Application. Dundon submits that the expenses it has incurred in rendering legal services to the
24 Committee during the Application Period are reasonable and necessary under the circumstances,
25 and that the reimbursement to Dundon for such expenses is appropriate and should be allowed.

26 **VI. VALUATION OF SERVICES**

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1 24. During the Application Period, Dundon’s professionals expended a total of 168.5
2 hours for which compensation is sought. **Exhibit 2** provides itemized time records of the attorneys
3 and paraprofessionals that have rendered services to the Committee during the Application Period.

4 25. The rates charged are Dundon’s normal hourly rates for work of this character and
5 pursuant to the Dundon’s agreement with the Committee. The reasonable value of the services
6 rendered by Dundon to the Committee during the Application Period is \$114,167.00.

7 26. All services for which compensation is requested by Dundon were performed for
8 or on behalf of the Committee, and not on behalf of the Debtor or other persons. There is no
9 agreement or understanding between Dundon and any other person, other than members of the
10 firm, for the sharing of compensation to be received in this case.

11 **VII. THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

12 27. Section 330 provides that a Court may award a professional employed under section
13 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered
14 [and] reimbursement for actual, necessary expenses.”⁶ Section 330 also sets forth the criteria for
15 the award of such compensation and reimbursement:

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

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

28 28. “A customary review of a fee application under § 330 starts with a determination
of the ‘lodestar,’ by multiplying a reasonable number of hours expended by a reasonable hourly

⁶ 11 U.S.C. § 330(a)(1).

⁷ 11 U.S.C. § 330(a)(3).

1 rate.”⁸ In addition, a bankruptcy court examines the circumstances and manner in which services
2 are performed and results achieved to determine a reasonable fee.⁹ Such examination includes a
3 review of the following factors:

- 4 (a) Were the services authorized?
- 5 (b) Were the services necessary or beneficial to the administration
6 of the estate at the time they were rendered?
- 7 (c) Are the services adequately documented?
- 8 (d) Are the fees required reasonable, taking into consideration the
9 factors set forth in section 330(a)(3)?
- 10 (e) In making the determination, the court must consider whether the
11 professional exercised reasonable billing judgment.¹⁰

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

20 **VIII. NOTICE**

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

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26 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).

27 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).

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

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CONCLUSION

WHEREFORE, Dundon respectfully requests: (i) allowance of \$114,167.00 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 \$0.00; and (ii) such other relief as this Court deems just and proper.

Respectfully submitted,

Dated: September 23, 2022.
Las Vegas, NV

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-and-

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*Financial Adviser to the Official Committee of
Unsecured Creditors*

Exhibit 1**COMPENSATION BY PROJECT CATEGORY
JUNE 15, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

| <i>Categories</i> | <i>Hours</i> | <i>Fees</i> |
|---|--------------|---------------------|
| Asset Analysis | 0.0 | \$0.00 |
| Business Analysis | 45.3 | \$30,192.00 |
| Case Administration | 3.4 | \$2,287.00 |
| Claims Analysis | 2.4 | \$1,689.00 |
| Court Hearings | 2.6 | \$1,814.00 |
| Committee Member/Professional Meetings & Communications | 29.3 | \$19,925.50 |
| Communications with Debtor's Advisers | 0.0 | \$0.00 |
| Exit planning | 0.0 | \$0.00 |
| Investigations | 11.9 | \$7,974.00 |
| Plan and Disclosure Statement | 65.7 | \$44,275.50 |
| Retention and Fee Applications | 7.4 | \$5,645.00 |
| Review of Other Case Professionals | 0.0 | \$0.00 |
| Sale Process | 0.5 | \$365.00 |
| Total, without giving effect to rate cap | 168.5 | \$114,167.00 |

Exhibit 2**ITEMIZED FEES
JUNE 15, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

| Time keeper | Date | Description | Task Code | Hours | Rate | Fee |
|--------------------|-------------|--|---|--------------|-------------|------------|
| Reubel | 6/15/2022 | Discussion w/ Y. Zhu re: DIP budget (.7); follow-up discussion w/ Y. Zhu re: same (.4) | Business Analysis | 1.1 | \$ 730 | \$ 803.00 |
| Reubel | 6/15/2022 | Review various LVDF 2004 motions | Investigations | 0.4 | \$ 730 | \$ 292.00 |
| Zhu | 6/15/2022 | Review DIP budget and prepare discussion with Eric Reubel. | Business Analysis | 0.7 | \$ 550 | \$ 385.00 |
| Zhu | 6/15/2022 | Discussion with Eric Reubel regarding proposed DIP budget. | Business Analysis | 0.4 | \$ 550 | \$ 220.00 |
| Reubel | 6/16/2022 | Review Y. Zhu email re: summary of recent docket filing | Business Analysis | 0.3 | \$ 730 | \$ 219.00 |
| Reubel | 6/16/2022 | Review APA | Sale Process | 0.5 | \$ 730 | \$ 365.00 |
| Reubel | 6/16/2022 | Internal pre-kick-off meeting with Dundon team | Committee Member/Professional Meetings & Communications | 0.5 | \$ 730 | \$ 365.00 |
| Reubel | 6/16/2022 | Kick-off w/ Kelly Drye and Dundon | Committee Member/Professional Meetings & Communications | 0.5 | \$ 730 | \$ 365.00 |
| Reubel | 6/16/2022 | Review limited DIP objection | Business Analysis | 0.5 | \$ 730 | \$ 365.00 |
| Reubel | 6/16/2022 | Review LVDF DIP objections | Business Analysis | 1.2 | \$ 730 | \$ 876.00 |
| Rizvi | 6/16/2022 | Participate in call with Kelley Drye to kick off engagement | Committee Member/Professional Meetings & Communications | 0.5 | \$ 650 | \$ 325.00 |
| Rizvi | 6/16/2022 | Review motions filed by UCC objection to DIP and other administrative matters | Business Analysis | 0.5 | \$ 650 | \$ 325.00 |
| Rizvi | 6/16/2022 | Participate on call with committee about agenda mainly about DIP loan | Committee Member/Professional Meetings & Communications | 0.7 | \$ 650 | \$ 455.00 |

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|--------|-----------|--|---|-----|--------|-------------|
| Short | 6/16/2022 | Familiarization of Front Sight Management case. (Reading dockets, pitchbooks, Reorg summaries, etc.) | Committee Member/Professional Meetings & Communications | 3.1 | \$ 450 | \$ 1,395.00 |
| Zhu | 6/16/2022 | Review new filings and draft email to Eric Reubel and Matt Dundon. | Business Analysis | 1.7 | \$ 550 | \$ 935.00 |
| Dundon | 6/16/2022 | Internal pre-kick-off meeting with Dundon team | Committee Member/Professional Meetings & Communications | 0.5 | \$ 790 | \$ 395.00 |
| Dundon | 6/16/2022 | Kick-off w/ Kelly Drye and Dundon | Committee Member/Professional Meetings & Communications | 0.5 | \$ 790 | \$ 395.00 |
| Short | 6/17/2022 | Call with E. Rubel and M. Dundon to discuss workstreams for Front Sight Management Case. | Case Administration | 0.5 | \$ 450 | \$ 225.00 |
| Reubel | 6/18/2022 | Review Wilson declaration ISO FS DIP | Business Analysis | 0.2 | \$ 730 | \$ 146.00 |
| Dundon | 6/18/2022 | Prepare Dundon Retention Application | Retention and Fee Applications | 1.0 | \$ 790 | \$ 790.00 |
| Dundon | 6/19/2022 | Further revise Dundon Retention Application | Retention and Fee Applications | 0.5 | \$ 790 | \$ 395.00 |
| Reubel | 6/20/2022 | Discussion w/ Y. Zhu re: docket filings | Business Analysis | 0.3 | \$ 730 | \$ 219.00 |
| Reubel | 6/20/2022 | Review Huygens declaration ISO FS DIP | Business Analysis | 1.2 | \$ 730 | \$ 876.00 |
| Zhu | 6/20/2022 | Review latest filings in preparation for discussion with Eric Reubel. | Business Analysis | 0.6 | \$ 550 | \$ 330.00 |
| Zhu | 6/20/2022 | Discussion with Eric Reubel regarding latest filings. | Business Analysis | 0.2 | \$ 550 | \$ 110.00 |
| Reubel | 6/21/2022 | Attend pre-call w/ KDW re: Province diligence materials | Committee Member/Professional Meetings & Communications | 0.3 | \$ 730 | \$ 219.00 |
| Reubel | 6/21/2022 | Review Province insider transfer analysis (.4); follow-up discussion w/ Y. Zhu re: same (.3) | Investigations | 0.7 | \$ 730 | \$ 511.00 |
| Reubel | 6/21/2022 | Review pleading packet from KDW | Business Analysis | 1.0 | \$ 730 | \$ 730.00 |

| | | | | | | |
|--------|-----------|--|---|-----|--------|-------------|
| Rizvi | 6/21/2022 | Participate on pre-call with UCC counsel to go over new information received from Province. | Investigations | 0.3 | \$ 650 | \$ 195.00 |
| Zhu | 6/21/2022 | Review insider transfer analysis from Province. | Investigations | 0.5 | \$ 550 | \$ 275.00 |
| Zhu | 6/21/2022 | Call with Eric Reubel to discuss Province's findings of insider transactions. | Investigations | 0.3 | \$ 550 | \$ 165.00 |
| Reubel | 6/22/2022 | Attend UCC meeting (.8); follow-up w/ Y. Zhu re: same (.3) | Committee Member/Professional Meetings & Communications | 1.1 | \$ 730 | \$ 803.00 |
| Reubel | 6/22/2022 | Discussion w/ R. LeHane re: case strategy | Committee Member/Professional Meetings & Communications | 0.4 | \$ 730 | \$ 292.00 |
| Zhu | 6/22/2022 | Attend Committee call | Committee Member/Professional Meetings & Communications | 1.0 | \$ 550 | \$ 550.00 |
| Zhu | 6/22/2022 | Call with Eric Reubel regarding Front Sight's latest filings. | Business Analysis | 0.3 | \$ 550 | \$ 165.00 |
| Zhu | 6/22/2022 | Review recent filings and draft summary. | Business Analysis | 1.7 | \$ 550 | \$ 935.00 |
| Reubel | 6/23/2022 | Review Y. Zhu docket summaries (.4); follow-up discussion w/ Y. Zhu re: same (.2) | Case Administration | 0.6 | \$ 730 | \$ 438.00 |
| Reubel | 6/23/2022 | Review/analyze Y. Zhu summary of 341 meeting | Investigations | 0.3 | \$ 730 | \$ 219.00 |
| Zhu | 6/23/2022 | Review recent filings and draft summary email to Matt Dundon, Eric Reubel, and Tabish Rizvi. | Business Analysis | 1.7 | \$ 550 | \$ 935.00 |
| Zhu | 6/23/2022 | Attend 341 meeting. | Investigations | 3.0 | \$ 550 | \$ 1,650.00 |
| Reubel | 6/24/2022 | Review model/working session w/ Y. Zhu | Business Analysis | 0.9 | \$ 730 | \$ 657.00 |
| Reubel | 6/24/2022 | Analyze LVDF motion to move litigation from state court to bankruptcy court | Case Administration | 0.3 | \$ 730 | \$ 219.00 |
| Rizvi | 6/24/2022 | Download files from docket and attached | Case Administration | 0.2 | \$ 650 | \$ 130.00 |

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|--------|-----------|---|--------------------------------|-----|--------|-----------|
| | | to emails from counsel for review | | | | |
| Reubel | 6/25/2022 | Review Dundon retention application and Dundon declaration | Retention and Fee Applications | 0.6 | \$ 730 | \$ 438.00 |
| Rizvi | 6/26/2022 | Review 1st Day Filings in advance of scheduled continuation of 1st Day Hearing on 06-27-2022 at 12:30 p.m. EST | Business Analysis | 1.2 | \$ 650 | \$ 780.00 |
| Reubel | 6/27/2022 | Attend continued DIP hearing | Court Hearings | 1.0 | \$ 730 | \$ 730.00 |
| Reubel | 6/27/2022 | Review and respond to J. Adams comments re: Dundon retention application | Retention and Fee Applications | 0.2 | \$ 730 | \$ 146.00 |
| Reubel | 6/27/2022 | Email R. Vohra re: scheduling hearing attendance | Case Administration | 0.1 | \$ 730 | \$ 73.00 |
| Rizvi | 6/27/2022 | Participate in con'd status conference/hearing scheduled with Honorable August B. Landis regarding DIP, BG's retention, et. al. | Court Hearings | 1.0 | \$ 650 | \$ 650.00 |
| Zhu | 6/27/2022 | Preparation and attendance of status hearing which also covered employment of BG Law and Province. | Business Analysis | 1.0 | \$ 550 | \$ 550.00 |
| Reubel | 6/28/2022 | Discussion w/ T. Rizvi and Y. Zhu re: insider transfers | Investigations | 0.4 | \$ 730 | \$ 292.00 |
| Reubel | 6/28/2022 | Receive and review Schedules | Business Analysis | 0.4 | \$ 730 | \$ 292.00 |
| Rizvi | 6/28/2022 | Participate on pre-call with counsel to understand issues that will be discussed at scheduled UCC update | Business Analysis | 0.4 | \$ 650 | \$ 260.00 |
| Rizvi | 6/28/2022 | Listen in on continued 1st Day Hearing regarding court's opinion rendered on DIP financing | Court Hearings | 0.2 | \$ 650 | \$ 130.00 |
| Rizvi | 6/28/2022 | Participate in meeting with Yi Zhu around | Investigations | 0.4 | \$ 650 | \$ 260.00 |

| | | | | | | |
|--------|-----------|---|-------------------------------|-----|--------|-------------|
| | | insider payments/transactions based on analysis prepared by Province, including call with Eric Reubel | | | | |
| Zhu | 6/28/2022 | Prepare Front Sight schedules presentation. | Business Analysis | 1.0 | \$ 550 | \$ 550.00 |
| Zhu | 6/28/2022 | Revise schedules presentation and forward to Eric Reubel. | Business Analysis | 0.5 | \$ 550 | \$ 275.00 |
| Zhu | 6/28/2022 | Review Piazza's declarations and SOFA; revise schedules presentation and forward to Eric Reubel. | Business Analysis | 0.7 | \$ 550 | \$ 385.00 |
| Zhu | 6/28/2022 | Revise schedules presentation with new committee member claim slide. | Business Analysis | 0.4 | \$ 550 | \$ 220.00 |
| Reubel | 6/29/2022 | Review LVDF motion to appoint an examiner | Investigations | 0.2 | \$ 730 | \$ 146.00 |
| Zhu | 6/29/2022 | Review recent filings and discuss with Sean Bradley. | Business Analysis | 0.6 | \$ 550 | \$ 330.00 |
| Reubel | 6/30/2022 | Review interim compensation motion | Case Administration | 0.3 | \$ 730 | \$ 219.00 |
| Reubel | 7/1/2022 | Review Piazza declaration | Business Analysis | 0.4 | \$ 760 | \$ 304.00 |
| Reubel | 7/1/2022 | Discussion w/ Y. Zhu re: revised cash budget | Business Analysis | 0.7 | \$ 760 | \$ 532.00 |
| Reubel | 7/1/2022 | Discussion w/ P. Huygens and Y. Zhu (1.3); follow-up call w/ L. Schlusel (.7) | Plan and Disclosure Statement | 2.0 | \$ 760 | \$ 1,520.00 |
| Zhu | 7/1/2022 | Call with Eric Reubel regarding revised cash budget. | Business Analysis | 0.7 | \$ 625 | \$ 437.50 |
| Zhu | 7/1/2022 | Call with Paul Huygens and Eric Reubel regarding revised projections | Plan and Disclosure Statement | 1.3 | \$ 625 | \$ 812.50 |
| Zhu | 7/1/2022 | Call with Lauren Schlusel and Eric Reubel regarding revised projections | Plan and Disclosure Statement | 0.7 | \$ 625 | \$ 437.50 |
| Zhu | 7/1/2022 | Review recent filing for information relating to West Wind | Business Analysis | 0.4 | \$ 625 | \$ 250.00 |

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| | | and the \$500/year annual fee program proposed by Debtor. | | | | |
| Reubel | 7/5/2022 | Review and respond to L. Schlusser email re: UCC meeting (.1); discuss UCC presentation w/ Y. Zhu (.3) | Committee Member/Professional Meetings & Communications | 0.4 | \$ 760 | \$ 304.00 |
| Reubel | 7/5/2022 | Discussion w/ Y. Zhu re: 13-week model and variance table (.4); revise and edit budget presentation (1.0) | Committee Member/Professional Meetings & Communications | 1.4 | \$ 760 | \$ 1,064.00 |
| Rizvi | 7/5/2022 | Participate on call with Eric Reubel and Yi Zhu regarding deliverable requested by counsel on 13 week cash flow | Business Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Zhu | 7/5/2022 | Review Province's revised budget and initial version. Compile spreadsheet to compare Front Sight actual vs. forecast variance. Summarize findings in presentation. | Plan and Disclosure Statement | 0.9 | \$ 625 | \$ 562.50 |
| Zhu | 7/5/2022 | Compile presentation regarding Front Sight actual vs. forecast variance. | Plan and Disclosure Statement | 0.7 | \$ 625 | \$ 437.50 |
| Zhu | 7/5/2022 | Call with Eric Reubel regarding Front Sight Management actual vs. forecast variance. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/5/2022 | Call with Eric Reubel regarding committee presentation | Committee Member/Professional Meetings & Communications | 0.4 | \$ 625 | \$ 250.00 |
| Reubel | 7/6/2022 | Pre-call w/ T. Rizvi re: UCC presentation | Committee Member/Professional Meetings & Communications | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/6/2022 | Attend part of UCC meeting | Committee Member/Professional Meetings & Communications | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/6/2022 | Discussion w/ Y. Zhu re: budget (.2); follow-up discussion re: same (.4) | Business Analysis | 0.6 | \$ 760 | \$ 456.00 |

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| Reubel | 7/6/2022 | Discussion w/ L. Schlusser and T. Rizvi re: UCC variance analysis and UCC meeting follow-up | Committee Member/Professional Meetings & Communications | 0.9 | \$ 760 | \$ 684.00 |
| Rizvi | 7/6/2022 | Researching LVDF motions on Stretto following committee update | Business Analysis | 0.9 | \$ 760 | \$ 684.00 |
| Rizvi | 7/6/2022 | Participate on UCC update call, including presentation Dundon's analysis on 13-week budget | Committee Member/Professional Meetings & Communications | 0.8 | \$ 760 | \$ 608.00 |
| Rizvi | 7/6/2022 | Participate on calls with Eric Reubel and Lauren Schlusser (KD) to discuss takeaways from variance analysis and presentation to UCC | Business Analysis | 0.9 | \$ 760 | \$ 684.00 |
| Zhu | 7/6/2022 | Revise committee presentation on cash budget. Draft email reply to Kelley Drye and forward the presentation. | Plan and Disclosure Statement | 0.3 | \$ 625 | \$ 187.50 |
| Zhu | 7/6/2022 | Call with Eric Reubel regarding committee presentation on plan projections | Business Analysis | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/6/2022 | Committee pre-call with Tabish Rizvi, Eric Reubel. | Committee Member/Professional Meetings & Communications | 0.3 | \$ 625 | \$ 187.50 |
| Zhu | 7/6/2022 | Zoom call with Kelley Drye and committee members. | Committee Member/Professional Meetings & Communications | 0.8 | \$ 625 | \$ 500.00 |
| Zhu | 7/8/2022 | Review debtor's diligence files from the dropbox link provided by Province. | Business Analysis | 1.3 | \$ 625 | \$ 812.50 |
| Reubel | 7/9/2022 | Review Y. Zhu summary analysis re: diligence materials | Investigations | 0.3 | \$ 760 | \$ 228.00 |
| Zhu | 7/9/2022 | Review debtor's diligence files from the dropbox link provided by Province and draft email to Eric Reubel. | Business Analysis | 0.4 | \$ 625 | \$ 250.00 |

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| Reubel | 7/12/2022 | Review UCC objection to examiner motion | Investigations | 0.3 | \$ 760 | \$ 228.00 |
| Zhu | 7/12/2022 | Review liquidation and restructuring projections and prepare for discussion with Eric Reubel. | Plan and Disclosure Statement | 0.7 | \$ 625 | \$ 437.50 |
| Reubel | 7/13/2022 | Respond to Province re: June fees | Case Administration | 0.1 | \$ 760 | \$ 76.00 |
| Reubel | 7/13/2022 | Discussion w/ Y. Zhu re: model projections | Plan and Disclosure Statement | 1.0 | \$ 760 | \$ 760.00 |
| Zhu | 7/13/2022 | Review Debtor's 7-year post-confirmation projections and compare with cash budget during chapter 11. | Business Analysis | 2.1 | \$ 625 | \$ 1,312.50 |
| Zhu | 7/13/2022 | Review Debtor's 7-year post-confirmation projections and draft email to Tabish Rizvi and Eric Reubel. | Business Analysis | 0.7 | \$ 625 | \$ 437.50 |
| Zhu | 7/13/2022 | Call with Eric Reubel regarding Debtor's post confirmation projections and presentation to Kelly Drye. | Plan and Disclosure Statement | 0.8 | \$ 625 | \$ 500.00 |
| Zhu | 7/13/2022 | Analyze the Debtor's post-confirmation plan projections and prepare presentation to the committee. Draft email to Eric Reubel. | Plan and Disclosure Statement | 2.3 | \$ 625 | \$ 1,437.50 |
| Zhu | 7/13/2022 | Revise the presentation to committee regarding Debtor's plan projections. | Committee Member/Professional Meetings & Communications | 0.4 | \$ 625 | \$ 250.00 |
| Reubel | 7/14/2022 | Review Y. Zhu work product/presentation (.3); follow-up email re: same (.2) | Plan and Disclosure Statement | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 7/14/2022 | Review model w/ Y. Zhu re: assumptions | Plan and Disclosure Statement | 1.0 | \$ 760 | \$ 760.00 |
| Reubel | 7/14/2022 | Review L. Schlusel plan and DS comments (.1); respond on Dundon update (.1) | Plan and Disclosure Statement | 0.2 | \$ 760 | \$ 152.00 |

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| Rizvi | 7/14/2022 | Participate in discussion with Yi Zhu, including reviewing projections prepared by Province | Plan and Disclosure Statement | 1.3 | \$ 760 | \$ 988.00 |
| Rizvi | 7/14/2022 | Participate on call with Eric Reubel regarding analysis of plan, disclosure statement, and projections and preparation of memo for Kelly Drye | Plan and Disclosure Statement | 0.8 | \$ 760 | \$ 608.00 |
| Zhu | 7/14/2022 | Modify the Debtor's cash flow model to add scenario analysis, in preparation for email/presentation to counsel. Draft email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 1.2 | \$ 625 | \$ 750.00 |
| Zhu | 7/14/2022 | Call with Eric Reubel regarding Debtor's plan projections | Plan and Disclosure Statement | 0.4 | \$ 625 | \$ 250.00 |
| Zhu | 7/14/2022 | Discussion with Tabish Rizvi regarding Debtor's post-confirmation projection model and sensitivity analysis. | Plan and Disclosure Statement | 0.5 | \$ 625 | \$ 312.50 |
| Zhu | 7/14/2022 | Review Committee's and Debtor's objections to LVDF's motion to appoint examiner and to terminate stay; draft email to Tabish Rizvi and Eric Reubel. | Business Analysis | 0.6 | \$ 625 | \$ 375.00 |
| Zhu | 7/14/2022 | Call with Eric Reubel and Tabish Rizvi regarding Debtor's plan projections, liquidation analysis, and memo to Kelly Drye. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 7/14/2022 | Draft the memo to Kelly Drye regarding plan projections and liquidation analysis. | Plan and Disclosure Statement | 1.7 | \$ 625 | \$ 1,062.50 |
| Zhu | 7/14/2022 | Continue to draft the memo to Kelly Drye regarding plan projections and liquidation analysis. | Plan and Disclosure Statement | 1.8 | \$ 625 | \$ 1,125.00 |

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| Reubel | 7/15/2022 | Review/analyze plan & DS | Plan and Disclosure Statement | 1.5 | \$ 760 | \$ 1,140.00 |
| Rizvi | 7/15/2022 | Prepare memo for counsel regarding observations on disclosure statement and liquidation analysis, including accompanying financial projections | Plan and Disclosure Statement | 2.4 | \$ 760 | \$ 1,824.00 |
| Rizvi | 7/15/2022 | Revise memo for counsel regarding observations on plan projections | Plan and Disclosure Statement | 2.6 | \$ 760 | \$ 1,976.00 |
| Zhu | 7/15/2022 | Call with Tabish Rizvi regarding plan projections and comparison with cash budget. | Plan and Disclosure Statement | 0.7 | \$ 625 | \$ 437.50 |
| Zhu | 7/15/2022 | Call with Tabish Rizvi regarding Debtor's projections in support of the restructuring plan. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Reubel | 7/16/2022 | Review/analyze projections memo | Plan and Disclosure Statement | 0.8 | \$ 760 | \$ 608.00 |
| Rizvi | 7/18/2022 | Prepare memo for counsel regarding observations on plan projections | Plan and Disclosure Statement | 1.3 | \$ 760 | \$ 988.00 |
| Zhu | 7/18/2022 | Modify the memo for restructuring plan projections and the supporting spreadsheet. | Plan and Disclosure Statement | 0.8 | \$ 625 | \$ 500.00 |
| Zhu | 7/18/2022 | Review filed plan and projections; summarize and draft email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 0.5 | \$ 625 | \$ 312.50 |
| Zhu | 7/18/2022 | Modify plan disclosure memo and email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 0.4 | \$ 625 | \$ 250.00 |
| Zhu | 7/18/2022 | Review Debtor's projections; verify calculation and simplify Excel formulas. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Rizvi | 7/19/2022 | Coordinate schedules for pre-call and scheduled UCC call, including sidebar with Eric Reubel | Business Analysis | 0.6 | \$ 760 | \$ 456.00 |

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| Zhu | 7/19/2022 | Further review Debtor's financial projections for the restructuring plan; modify model for scenario analysis and illustration of cost differences from cash budget. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 7/20/2022 | Download and review latest filings and summarize for Tabish Rizvi and Eric Reubel. | Case Administration | 0.6 | \$ 625 | \$ 375.00 |
| Zhu | 7/20/2022 | Set up Teams call for plan projections discussion. | Committee Member/Professional Meetings & Communications | 0.1 | \$ 625 | \$ 62.50 |
| Reubel | 7/21/2022 | Discussion w/ KDW and Dundon re: projection memo | Plan and Disclosure Statement | 0.6 | \$ 760 | \$ 456.00 |
| Reubel | 7/21/2022 | Review Debtor's ch 11 status report | Court Hearings | 0.4 | \$ 760 | \$ 304.00 |
| Rizvi | 7/21/2022 | Review plan projections deliverable shared with counsel in preparation of discussion with Kelley Drye | Plan and Disclosure Statement | 0.3 | \$ 760 | \$ 228.00 |
| Rizvi | 7/21/2022 | Participate on call with counsel regarding plan projections memo circulated earlier in the week | Plan and Disclosure Statement | 0.7 | \$ 760 | \$ 532.00 |
| Zhu | 7/21/2022 | Review Debtor's plan disclosure and projections in preparation for discussion with Kelly Drye. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/21/2022 | Discussion with Lauren Schlusel, Eric Reubel, and Tabish Rizvi regarding plan projections. | Committee Member/Professional Meetings & Communications | 0.9 | \$ 625 | \$ 562.50 |
| Zhu | 7/21/2022 | Call with Eric Reubel and Province (Paul Huygens, Tanner James) regarding plan projections. | Committee Member/Professional Meetings & Communications | 0.6 | \$ 625 | \$ 375.00 |
| Rizvi | 7/22/2022 | Participate on call with Yi and Eric | Plan and Disclosure Statement | 0.5 | \$ 760 | \$ 380.00 |

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| | | following up on call with Province regarding debtor's refresh of plan projections | | | | |
| Rizvi | 7/22/2022 | Participate on call with Province regarding debtor's refresh of plan projections | Plan and Disclosure Statement | 1.2 | \$ 760 | \$ 912.00 |
| Zhu | 7/22/2022 | Review revised plan projection model from Debtor; compile list of questions in preparation for call at 12 noon ET. | Plan and Disclosure Statement | 1.7 | \$ 625 | \$ 1,062.50 |
| Zhu | 7/22/2022 | Call with Debtor's financial advisor regarding plan projections. | Committee Member/Professional Meetings & Communications | 1.2 | \$ 625 | \$ 750.00 |
| Zhu | 7/22/2022 | Review Debtor's June operating report and draft email to Tabish Rizvi and Eric Reubel. | Business Analysis | 0.3 | \$ 625 | \$ 187.50 |
| Zhu | 7/22/2022 | Modify plan projection model; add toggles and data table for sensitivity analysis; draft presentation for counsel. | Plan and Disclosure Statement | 1.4 | \$ 625 | \$ 875.00 |
| Zhu | 7/22/2022 | Draft revised memo to Kelly Drye and presentation to Committee, both regarding plan projections. | Plan and Disclosure Statement | 1.7 | \$ 625 | \$ 1,062.50 |
| Rizvi | 7/23/2022 | Participate on call with Yi Zhu regarding deliverable for counsel and committee following debtor's refresh of plan projections | Plan and Disclosure Statement | 0.3 | \$ 760 | \$ 228.00 |
| Zhu | 7/23/2022 | Call with Tabish Rizvi regarding memo to Kelly Drye and presentation to Committee, both regarding plan projections. | Plan and Disclosure Statement | 0.4 | \$ 625 | \$ 250.00 |
| Zhu | 7/23/2022 | Revise plan projections Excel model to add scenario | Plan and Disclosure Statement | 2.0 | \$ 625 | \$ 1,250.00 |

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| | | analysis; revise memo to Kelly Drye and presentation to Committee. | | | | |
| Reubel | 7/24/2022 | Receive and review revised projections memo (.5); follow-up with Y. Zhu re: same | Plan and Disclosure Statement | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 7/24/2022 | Discussion w/ Y. Zhu re: LVDF amortization rate | Plan and Disclosure Statement | 0.3 | \$ 760 | \$ 228.00 |
| Rizvi | 7/24/2022 | Participate on call with Eric regarding deliverables for counsel and committee requested by Kelley Drye following refresh of plan projections | Plan and Disclosure Statement | 0.5 | \$ 760 | \$ 380.00 |
| Zhu | 7/24/2022 | Revise memo to Kelly Drye and presentation to Committee; draft email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 7/24/2022 | Revise plan projection model from Debtor's FA to add scenario analysis; compile scenario tables. | Plan and Disclosure Statement | 1.1 | \$ 625 | \$ 687.50 |
| Zhu | 7/24/2022 | Revise memo to Kelly Drye and presentation to Committee, based on input from Eric Reubel and Tabish Rizvi; draft email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 2.0 | \$ 625 | \$ 1,250.00 |
| Zhu | 7/24/2022 | Discussion with Eric Reubel and Tabish Rizvi through emails. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/24/2022 | Call with Eric Reubel regarding Debtor's Plan Projections and sensitivity analysis. | Plan and Disclosure Statement | 0.4 | \$ 625 | \$ 250.00 |
| Zhu | 7/24/2022 | Revise memo to Kelly Drye and presentation to Committee based on Eric Reubel's input. | Plan and Disclosure Statement | 0.5 | \$ 625 | \$ 312.50 |
| Zhu | 7/24/2022 | Call with Eric Reubel regarding amortization rate of | Plan and Disclosure Statement | 0.3 | \$ 625 | \$ 187.50 |

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| | | LVDF debt and related revision of memo to Kelley Drye. | | | | |
| Reubel | 7/25/2022 | Meeting w/ L. Schlüssel and Y. Zhu to review UCC presentation and agenda | Committee Member/Professional Meetings & Communications | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 7/25/2022 | Review KDW committee email | Committee Member/Professional Meetings & Communications | 0.2 | \$ 760 | \$ 152.00 |
| Zhu | 7/25/2022 | Teams call with Eric Reubel and Lauren Schlüssel regarding plan projections and committee presentation. | Plan and Disclosure Statement | 0.5 | \$ 625 | \$ 312.50 |
| Rizvi | 7/26/2022 | Participate on pre-call with counsel in advance of UCC call | Committee Member/Professional Meetings & Communications | 1.3 | \$ 760 | \$ 988.00 |
| Zhu | 7/26/2022 | Revise Committee presentation and email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 7/26/2022 | Review and analyze prospective post-confirmation member list from Debtor. | Plan and Disclosure Statement | 0.5 | \$ 625 | \$ 312.50 |
| Zhu | 7/26/2022 | Call with Eric Reubel regarding UCC presentation on Plan Disclosure. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/26/2022 | Further revise presentation on Plan Disclosure and email to Eric Reubel and Tabish Rizvi. | Plan and Disclosure Statement | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 7/26/2022 | Review related adversary case (22-01116). | Business Analysis | 0.6 | \$ 625 | \$ 375.00 |
| Zhu | 7/26/2022 | Pre-call with counsel regarding plan disclosure to Committee. | Plan and Disclosure Statement | 1.2 | \$ 625 | \$ 750.00 |
| Zhu | 7/26/2022 | Revise Committee presentation on plan disclosure and projections. | Plan and Disclosure Statement | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 7/26/2022 | Revise Committee presentation on plan disclosure and projections. | Plan and Disclosure Statement | 1.4 | \$ 625 | \$ 875.00 |

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| Reubel | 7/27/2022 | Revise UCC presentation | Committee Member/Professional Meetings & Communications | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/27/2022 | Receive and analyze membership data (.5); draft email to KDW (.2) | Business Analysis | 0.7 | \$ 760 | \$ 532.00 |
| Reubel | 7/27/2022 | UCC pre-call w/ KDW and Dundon | Committee Member/Professional Meetings & Communications | 1.0 | \$ 760 | \$ 760.00 |
| Reubel | 7/27/2022 | Further revise UCC Presentation | Committee Member/Professional Meetings & Communications | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 7/27/2022 | Review/analyze comments from committee member re: rate structures | Business Analysis | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/27/2022 | Review and respond to L. Schlüssel email re: insider inflows/outflows | Investigations | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/27/2022 | Attend UCC call (1.4); follow-up call w/ KDW and Dundon (.6) | Committee Member/Professional Meetings & Communications | 2.0 | \$ 760 | \$ 1,520.00 |
| Rizvi | 7/27/2022 | Participate on UCC call to discuss plan projections and LVDF | Plan and Disclosure Statement | 1.4 | \$ 760 | \$ 1,064.00 |
| Zhu | 7/27/2022 | Attend Committee zoom meeting. | Committee Member/Professional Meetings & Communications | 1.4 | \$ 625 | \$ 875.00 |
| Rizvi | 7/28/2022 | Participate on call with counsel regarding debtor's business plan and execution | Plan and Disclosure Statement | 0.5 | \$ 760 | \$ 380.00 |
| Rizvi | 7/28/2022 | Correspond with Yi Zhu regarding scenario analysis as requested by counsel regarding plan feasibility | Plan and Disclosure Statement | 0.2 | \$ 760 | \$ 152.00 |
| Zhu | 7/28/2022 | Follow-up Teams call with counsel. | Plan and Disclosure Statement | 0.6 | \$ 625 | \$ 375.00 |
| Zhu | 7/28/2022 | Perform additional scenario analyses on Plan Projection model and draft presentation. | Plan and Disclosure Statement | 1.1 | \$ 625 | \$ 687.50 |

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| Zhu | 7/28/2022 | Modify Plan Projection model and generate scenarios under different assumptions; draft presentation and email to Tabish Rizvi and Eric Reubel. | Plan and Disclosure Statement | 1.5 | \$ 625 | \$ 937.50 |
| Rizvi | 7/29/2022 | Saving working papers and files to company Dropbox for case management | Case Administration | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 7/30/2022 | Review LVDF motion to quash 2004 exams | Investigations | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 8/1/2022 | Telecon w/ Dundon and Kelley Drye re: case strategy (.7); follow-up w/ T. Rizvi re: same (.2) | Business Analysis | 0.9 | \$ 760 | \$ 684.00 |
| Reubel | 8/1/2022 | Review/analyze Frontsight point allocation calculations | Claims Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Rizvi | 8/1/2022 | Participate on call with Kelley Drye regarding myriad investigations into debtor's plan | Business Analysis | 0.6 | \$ 760 | \$ 456.00 |
| Rizvi | 8/1/2022 | Participate on follow up call with Eric Reubel regarding outline discussed with counsel | Business Analysis | 0.2 | \$ 760 | \$ 152.00 |
| Zhu | 8/1/2022 | Zoom call with Kelley Drye. | Plan and Disclosure Statement | 0.7 | \$ 625 | \$ 437.50 |
| Reubel | 8/2/2022 | Discussion w/ T. Rizvi re: Debtor's forecast stress test to scenarios | Business Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Rizvi | 8/2/2022 | Participate in discussion with Zhu about modeling different scenarios based on what debtor has disclosed to date | Business Analysis | 1.3 | \$ 760 | \$ 988.00 |
| Rizvi | 8/2/2022 | Participate on call with Eric Reubel about modeling different scenarios based on what debtor has disclosed to date | Business Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 8/3/2022 | Review J. Adams email re: plan process | Plan and Disclosure Statement | 0.1 | \$ 760 | \$ 76.00 |

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| Reubel | 8/6/2022 | Review Interim Fee Order [D.I. 318] | Retention and Fee Applications | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 8/13/2022 | Prepare first monthly fee application | Retention and Fee Applications | 3.0 | \$ 760 | \$ 2,280.00 |
| Reubel | 8/14/2022 | Further prepare first monthly fee application | Retention and Fee Applications | 1.0 | \$ 760 | \$ 760.00 |
| Rizvi | 8/15/2022 | Reciprocate counsel's request for updates to Dundon's initial fee application | Retention and Fee Applications | 0.8 | \$ 760 | \$ 608.00 |
| Reubel | 8/18/2022 | Receive and review Y. Zhu's diligence list | Business Analysis | 0.3 | \$ 760 | \$ 228.00 |
| Reubel | 8/18/2022 | Review and edit diligence list re: insider investigation | Investigations | 0.2 | \$ 760 | \$ 152.00 |
| Zhu | 8/18/2022 | Review due diligence list from counsel and propose additions. | Business Analysis | 0.3 | \$ 625 | \$ 187.50 |
| Reubel | 8/19/2022 | Review Debtor's opposition to LVDF's motion to quash 2004 exams [D.I. 322] & Gubner declaration ISO Debtor's opposition to same (.4) | Investigations | 0.7 | \$ 760 | \$ 532.00 |
| Zhu | 8/22/2022 | Review recent filings and prepare for discussion. | Business Analysis | 0.4 | \$ 625 | \$ 250.00 |
| Zhu | 8/22/2022 | Email response to Committee member question regarding weekly meeting. | Committee Member/Professional Meetings & Communications | 0.2 | \$ 625 | \$ 125.00 |
| Reubel | 8/23/2022 | Discussion w/ T. Rizvi re: Piazza's email solicitation | Business Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 8/23/2022 | Receive and review Y. Zhu's claims analysis | Claims Analysis | 0.5 | \$ 760 | \$ 380.00 |
| Reubel | 8/23/2022 | Review and respond to Y. Zhu email re: \$2.4 million landlord claim | Claims Analysis | 0.2 | \$ 760 | \$ 152.00 |
| Reubel | 8/23/2022 | Receive and review Y. Zhu analysis re: Piazza's claim for Alaska rent | Claims Analysis | 0.2 | \$ 760 | \$ 152.00 |
| Reubel | 8/23/2022 | Analyze July MOR [D.I. 325] | Business Analysis | 0.6 | \$ 760 | \$ 456.00 |
| Rizvi | 8/23/2022 | Participate on call with Eric Reubel to discuss Piazza's email and debtors' end game | Business Analysis | 0.5 | \$ 760 | \$ 380.00 |

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| Zhu | 8/23/2022 | Review claims analysis from Debtor's financial advisor and draft email to Eric Reubel and Rizvi. | Claims Analysis | 0.5 | \$ 625 | \$ 312.50 |
| Zhu | 8/23/2022 | Research for the \$2.4 million landlord claim and email to Eric Reubel, Rizvi and counsel. | Claims Analysis | 0.2 | \$ 625 | \$ 125.00 |
| Zhu | 8/23/2022 | Research into Piazza's claim for Alaska rent; review filings for references to Alaska; draft email to counsel, Eric Reubel and Rizvi. | Claims Analysis | 0.3 | \$ 625 | \$ 187.50 |
| Reubel | 8/24/2022 | Prepare for and attend periodic UCC call (1.5); follow-up discussion with KDW team re: same (.2) | Committee Member/Professional Meetings & Communications | 1.7 | \$ 760 | \$ 1,292.00 |
| Reubel | 8/24/2022 | Receive and respond to Y. Zhu email re: LVDF issues | Business Analysis | 0.6 | \$ 760 | \$ 456.00 |
| Reubel | 8/24/2022 | Attend weekly UCC zoom call (1.0); follow-up w/ R. LeHane re: same (.3) | Committee Member/Professional Meetings & Communications | 1.3 | \$ 760 | \$ 988.00 |
| Reubel | 8/24/2022 | Receive and review insider analysis documents | Investigations | 0.9 | \$ 760 | \$ 684.00 |
| Reubel | 8/24/2022 | Status call w/ R. LeHane (.2); query to Province re: same (.2) | case Administration | 0.4 | \$ 760 | \$ 304.00 |
| Reubel | 8/24/2022 | Review and respond to J. Adams email re: July MOR | Business Analysis | 0.8 | \$ 760 | \$ 608.00 |
| Rizvi | 8/24/2022 | Participate on call with UCC, follow up with counsel afterwards | Business Analysis | 1.5 | \$ 760 | \$ 1,140.00 |
| Zhu | 8/24/2022 | Research into questions raised by LVDF and forwarded by Eric Reubel; draft email replies. | Business Analysis | 0.6 | \$ 625 | \$ 375.00 |
| Zhu | 8/24/2022 | Attend weekly Committee Zoom call. | Committee Member/Professional Meetings & Communications | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 8/24/2022 | Download and review zipped documents | Investigations | 0.9 | \$ 625 | \$ 562.50 |

| | | | | | | |
|--------|-----------|---|-------------------------------|-----|--------|-----------|
| | | from Debtor for insider analysis. | | | | |
| Zhu | 8/25/2022 | Call with Rizvi regarding insider analysis. | Investigations | 0.1 | \$ 625 | \$ 62.50 |
| Reubel | 8/26/2022 | Review LVDF reply ISO motion to quash [D.I.327] | Investigations | 1.2 | \$ 760 | \$ 912.00 |
| Reubel | 8/27/2022 | Discussion w/ P. Huygens re: plan (1.0); draft call report to KDW re: same (.3) | Plan and Disclosure Statement | 1.3 | \$ 760 | \$ 988.00 |
| Zhu | 8/30/2022 | Set up September site visit. | Business Analysis | 0.1 | \$ 625 | \$ 62.50 |
| Zhu | 8/30/2022 | Review July MOR. | Business Analysis | 1.0 | \$ 625 | \$ 625.00 |
| Zhu | 8/31/2022 | Review insider report sent by counsel; draft email to counsel. | Business Analysis | 0.5 | \$ 625 | \$ 312.50 |

Exhibit 3**COMPENSATION BY TIMEKEEPER
JUNE 15, 2022 THROUGH AND INCLUDING AUGUST 31, 2022**

| <i>Name</i> | <i>Rate</i> | <i>Hours</i> | <i>Fees</i> |
|---------------------------------|-----------------|--------------|------------------|
| Matthew Dundon | \$790.00 | 2.5 | 1,975.0 |
| Eric Reubel | \$751.00 | 54.0 | 40,575.0 |
| Tabish Rizvi | \$740.00 | 30.1 | 22,282.0 |
| Yi Zhu | \$609.00 | 78.3 | 47,715.0 |
| Thomas Short | \$450.00 | 3.6 | 1,620.0 |
| Total | | 168.5 | 114,167.0 |
| Blended Rate¹ | \$677.55 | | |

¹ Reflects blended Dundon rates for increases effective July 1, 2022

**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: Dundon Advisers LLC

Date of Employment: July 29, 2022, effective as of June 15, 2022

Interim Fee Application No. First

Amounts Requested: **Client Approval:** Yes No

Fees \$114,167.00

Expenses \$0.00

Total \$114,167.00

Hours 168.5 Blended Rate: \$677.55

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

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

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

Total Amount Paid: \$73,888.80¹

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

/s/ Eric A. Reubel Date September 23, 2022
Signature

¹ Payment of 80% of fees and 100% of expenses was received in connection with Dundon Advisers' Combined First Monthly Fee Statement, 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].