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 and Debtor in Possession

9 **UNITED STATES BANKRUPTCY COURT**
 10 **DISTRICT OF NEVADA**

11 In re
 12 Front Sight Management LLC,
 13
 14 Debtor.

Case No. 22-11824-abl
 CHAPTER 11

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

19
 20 **DECLARATION OF STEVEN T. GUBNER IN SUPPORT OF FIRST INTERIM**
 21 **APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTOR,**
 22 **RENDERED AND REIMBURSEMENT OF EXPENSES**

23 I, Steven T. Gubner, declare as follows:

24 1. I am an attorney duly licensed in and am a member in good standing of the bar for the
 25 State of Nevada and am admitted to practice before all courts of the State of Nevada, including the
 26 United States Bankruptcy Court for the District of Nevada, and I am authorized to make this
 27 declaration. I am the managing partner and founder of the law firm of BG Law LLP (“BG”),
 28 bankruptcy counsel for Front Sight Management LLC (the “Debtor”).

1 2. I am the attorney at BG primarily responsible for overseeing the billing in this matter
2 and for assuring compliance with the Bankruptcy Rules, the Local Rules, and the guidelines from the
3 Office of the United States Trustee (“US Trustee”). The facts set forth herein are based upon my
4 personal knowledge, and, if called as a witness, I could and would testify competently thereto.

5 3. I make this declaration in support of the *First Interim Application of BG Law LLP, as*
6 *Bankruptcy Counsel for the Debtor, for the Allowance of Compensation for Professional Services*
7 *Rendered and Reimbursement of Expenses* (the “Application”) filed concurrently with this
8 declaration. All capitalized terms not otherwise defined herein shall have the same meaning as set
9 forth in the Application.

10 4. I reviewed the Application, and the matters stated therein are true to the best of my
11 knowledge, information and belief.

12 5. The amounts requested in the Application for fees and costs are based on the records
13 assembled and kept in the ordinary course of BG’s business. Such records are made at or near the
14 time incurred by, or from information transmitted by, a person with knowledge of the matter
15 recorded.

16 6. Pursuant to the terms of the order approving BG’s employment, BG was employed on
17 an hourly fee basis.

18 7. A true and correct copy of BG’s detailed billing statements including all of BG’s time
19 records for legal services rendered in this case during the Covered Period, including time spent by
20 paralegals, is attached as **Exhibit 1** to the Application, and incorporated herein by this reference.
21 The billing statement reflects a format in which the entries are listed in chronological order and
22 sorted by activity code category. The activity code categories used were created in conformity with
23 the guidelines established by the US Trustee.

24 8. True and correct copies of summaries of fees sorted by activity codes for timekeeper
25 totals and on a monthly basis, prepared for the purpose of this Application, are attached to the
26 Application as **Exhibits 2 and 3**, respectively, and are incorporated herein by this reference.

27 9. A true and correct copy of a summary of all expenses incurred on a monthly basis in
28 representing the Debtor during the Covered Period is attached as **Exhibit 4** to the Application and


1 incorporated herein by this reference. I am informed and believe that BG adhered to allowable rates
2 for expenses as fixed by the guidelines set forth by the US Trustee.

3 10. Biographical information describing the professional education and experience of
4 BG's attorneys and paralegals that rendered services in this case is attached as **Exhibit 5** to the
5 Application and incorporated herein by this reference.

6 11. No agreement or understanding exists between BG and any other entity for the
7 sharing of compensation received or to be received for services rendered in or in connection with the
8 case except as between members and associates of the BG.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct.

11 Executed this 23rd day of September, 2022 at Woodland Hills, California.

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Steven T. Gubner

CERTIFICATE OF SERVICE

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

On September 23, 2022, I served the following document:

DECLARATION OF STEVEN T. GUBNER IN SUPPORT OF FIRST INTERIM APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES

BY ELECTRONIC MAIL

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

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- CHAPTER 11 - LV USTPRegion17.lv.ecf@usdoj.gov
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- JESSICA S. WELLINGTON jwellington@bg.law

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

Executed September 23, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY