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14 *Robert Dziubla*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **DISTRICT OF NEVADA**

17 In re:  
18 FRONT SIGHT MANAGEMENT, LLC  
19 Debtor.

Case No. BK-S-22-11824-ABL  
Chapter 11

**JOINT STATUS REPORT AND REQUEST TO  
WITHDRAW AND TAKE OFF CALENDAR  
THE MOTION TO QUASH AND/OR  
PROTECTIVE ORDER FILED BY LAS VEGAS  
DEVELOPMENT FUND, LLC AND ROBERT  
W. DZIUBLA**

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25 Las Vegas Development Fund, LLC ("**LVDF**"), Robert Dzibula ("**Mr. Dziubla**") by and  
26 through their attorneys Brian D. Shapiro, Esq., of the Law Office of Brian D. Shapiro, LLC, and  
27 Andrea M. Champion, Esq., of Jones Lovelock PLLC, and Front Sight Management, LLC ("**Debtor**"),  
28 by and through, Jessica Bagdanov, Esq., of BG Law LLP hereby submits their joint status report and

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1 jointly request that LVDF’s Motion to Quash and/or Protective Order be taken off calendar.

2 On July 29, 2022, LVDF and Mr. Dziubla filed a motion to quash 2004 exams and subpoenas to  
3 produce documents and request for a protective order (“**Motion to Quash**”). See, ECF No. 309.

4 On September 1, 2022, this Court heard arguments on the Motion to Quash, requested that the  
5 Parties meet and confer again and report back to the Court on or before September 9, 2022. See,  
6 ECF No. 333.

7 On September 7, 2022, the Parties had a productive meet and confer and on September 7, 2022,  
8 submitted their first Joint Status Report, requesting that the Court continue the Motion to Quash to  
9 September 30, 2022 at 9:30 a.m., for status only. See, ECF No. 335. The Parties had a subsequent  
10 meet and confer on September 21, 2022 and, at that time, Debtor agreed to withdraw its Subpoenas  
11 for Documents to LVDF and Mr. Dziubla as well as its requests for 2004 exams of LVDF and Mr.  
12 Dziubla. Debtor is withdrawing its Subpoenas and 2004 exams without prejudice and reserving the  
13 right to issue new subpoenas and/or deposition notices once its objection to LVDF’s claim is on file.  
14 In light of Debtor’s decision to withdraw the Subpoenas and 2004 exams, the parties agree that  
15 LVDF’s Motion to Quash be withdrawn. The parties’ reserve their rights to address any future  
16 subpoenas, 2004 exams and/or deposition notices.

17 DATED 09-29-2022

DATED 09-29-2022

19 /s/ Nicole E. Lovelock, Esq  
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