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9	TRACY HOPE DAVIS		
10	UNITED STATES BANKRUPTCY COURT		
11	DISTRICT OF NEVADA		
12	In re	Case No: BK-S-22-11824-ABL Chapter 11	
13	FRONT SIGHT MANAGEMENT LLC,	Date: October 24, 2022	
14	Debtor.	Time: 9:30 a.m.	
15	Location: Foley Courtroom 1, Telephonic OMNIBUS RESERVATION OF RIGHTS OF THE U.S. TRUSTEE WITH RESPECT TO:		
16 17	(A) FIRST INTERIM FEE APPLICATION OF PROVINCE, LLC, AS FINANCIAL ADVISOR FOR THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES [ECF NOS. 358, 359, 382 & 384];		
18	(B) FIRST INTERIM FEE APPLICATION OF CARLYON CICA CHTD., AS NEVADA COUNSEL TO		
19	THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE		
20	Period of June 13, 2022 Through Augus		
21	(C) FIRST INTERIM FEE APPLICATION OF KELLEY DRYE & WARREN LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES		
22	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 [ECF Nos. 364, 365 & 368];		
23			
24	(D) FIRST INTERIM FEE APPLICATION OF DUNDON ADVISERS LLC FOR COMPENSATION		
25	FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL Adviser to the Official Committee of Unsecured Creditors of Front Sight		
26	MANAGEMENT LLC FOR THE PERIOD FROM JUNE 15, 2022 THROUGH AND INCLUDING AUGUST 31, 2022 [ECF Nos. 366, 367 & 368]; AND,		
27 28	(E) FIRST INTERIM FEE APPLICATION OF BG LAW LLP, AS BANKRUPTCY COUNSEL FOR THE DEBTOR, FOR THE ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES [ECF Nos. 369, 370, 383 & 384].		

To the Honorable August B. Landis, Chief United States Bankruptcy Judge: Tracy Hope Davis, United States Trustee for Region 17, hereby files this omnibus

reservation of rights with respect to:

(a) First Interim Fee Application of Province, LLC ("Province"), As Financial
 Advisor for the Debtor, for the Allowance of Compensation for Professional Services Rendered
 and Reimbursement of Expenses [ECF Nos. 358, 359, 382 & 384];

(b) First Interim Fee Application of Carlyon Cica Chtd. ("CC"), as Nevada Counsel
to the Official Committee of Unsecured Creditors, for Allowance of Compensation for
Professional Services Rendered and Reimbursement of Expenses for the Period of June 13, 2022
Through August 31, 2022 [ECF Nos. 362, 363 & 368];

(c) First Interim Fee Application of Kelley Drye & Warren LLP ("KDW") 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 [ECF Nos. 364, 365 & 368];

(d) First Interim Fee Application of Dundon Advisers LLC ("DA") 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 [ECF Nos. 366, 367 & 368]; and,

(e) First Interim Fee Application of BG Law LLP ("BG"), as Bankruptcy Counsel for the Debtor, for the Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses [ECF Nos. 369, 370, 383 & 384].

In support of her reservation of rights, the U.S. Trustee respectfully represents as follows:

1. The fee applicant bears the burden of proof to show entitlement to the requested fees under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev'd in part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990 (Bankr. D. Nev. 1990) ("The applicant ... has the burden of proof to show the reasonableness of the fees sought.").

2. Through the Province First Interim Application, Province seeks allowance of fees of \$581,381.50 and reimbursement of expenses of \$750.07 for 05/24/2022 – 08/31/2022. [*See* ECF No. 382, p. 1 of 98].

3. Through the CC First Interim Application, CC seeks allowance of fees of \$82,570.00 and reimbursement of expenses of \$1,945.76 for 06/13/2022 – 08/31/2022. [*See* ECF No. 362, p. 2 of 68].

4. Through the KDW First Interim Application, KDW seeks allowance of fees of \$484,299.50 and reimbursement of expenses of \$875.87 for 06/13/2022 – 08/31/2022. [*See* ECF No. 364, p. 2 of 237].

5. Through the DA First Interim Application, DA seeks allowance of fees of
\$114,167.00 and reimbursement of expenses of \$0.00 for 06/13/2022 – 08/31/2022. [See ECF No. 366, p. 2 of 30].

6. Through the BG First Interim Application, BG seeks allowance of fees of \$577,955.50 and reimbursement of expenses of \$13,580.22 for 05/24/2022 – 08/31/2022. [See ECF No. 383, p. 1 of 98].

7. Although the U.S. Trustee does not object to the requested fees at this time, the U.S. Trustee reserves the right to object to any and all of Province's, CC's, KDW's, DA's and/or BG's fees on any and all grounds in connection with subsequent interim and final fee applications. *Cf. In re Strand*, 375 F.3d 854, 858 (9th Cir. 2004) (interim fee awards are "always" subject to reexamination during the course of the case).

Dated: October 7, 2022

TRACY HOPE DAVIS UNITED STATES TRUSTEE, REGION 17

By: <u>/s/ Edward M. McDonald Jr.</u> Edward M. McDonald Jr., Esq., Trial Attorney