

1 MICHAEL R. HOGUE, ESQ.
Nevada Bar No. 12400
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Nevada Bar No. 14025
3 **GREENBERG TRAUIG, LLP**
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Email: hoguem@gtlaw.com
6 andersonel@gtlaw.com

7 *Special Counsel for Debtor*

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **DISTRICT OF NEVADA**

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

Case No. 22-11824-abl
Chapter 11

Hearing Date: November 18, 2022
Hearing Time: 9:30 a.m.

16
17 **FIRST AND FINAL APPLICATION OF GREENBERG TRAUIG, LLP,**
18 **AS SPECIAL COUNSEL FOR THE DEBTOR, FOR THE ALLOWANCE**
19 **OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED**

20 Greenberg Traurig, LLP (“GT”), special counsel to debtor Front Sight Management LLC
21 (“Debtor”), hereby files this application (the “Application”), pursuant to Section 330 of Title 11 of
22 the United States Code (the “Bankruptcy Code”), Federal Rule of Bankruptcy Procedure 2016, and
23 Local Rule 2016, seeking entry of an order allowing and authorizing payment for final compensation
24 totaling \$24,925.50 for fees for professional services rendered as Special Counsel to the Debtor from
25 July 22, 2022 to the present (the “Fee Period”). This Application is based on the following
26 Memorandum of Points and Authorities, the concurrently filed declaration of James S. Mace (the
27 “Mace Declaration”), and the papers and pleadings filed in this chapter 11 case, judicial notice of
28 which is respectfully requested pursuant to Federal Rule of Evidence 201. In support of this
Application, GT represents as follows:

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SUMMARY COVER SHEET

Fee Application:	First and Final
Applicant:	Greenberg Traurig, LLP
Capacity:	Special Counsel to Debtor
Debtor:	Front Sight Management LLC
Covered Period:	July 22, 2022 – Present
Petition Date:	May 24, 2022
Retention Date:	August 5, 2022
Date of Order Approving Employment:	October 19, 2022 (ECF No. 425)
Previous Fees and Costs Requested:	\$0
Previous Fees and Costs Paid:	\$0
First and Final Fees Requested:	\$24,925.50
First and Final Costs Requested:	\$0
Total Compensation Requested:	\$24,925.50
Blended Rate for Attorneys:	\$728.54
Blended Rate for All Timekeepers:	\$555.03
Number of Professionals:	3
Number of Hours:	44.9

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JURISDICTION AND VENUE

1. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A).
3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).
4. The statutory basis for the relief requested herein are Sections 327, 330, 331, 1107 and 1108 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016.
5. Pursuant to Local Rule 9014.2, GT consents to entry of a final order or judgment by the bankruptcy judge if it is determined that the bankruptcy judge, absent consent of the parties, cannot enter final orders for judgment consistent with Article III of the U.S. Constitution.

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BACKGROUND OF DEBTOR’S BANKRUPTCY CASE

1
2 6. On May 24, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief
3 under chapter 11 of the Bankruptcy Code. The Debtor continues to operate its business and manage
4 its affairs as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
5 No trustee or examiner has been appointed in this case. On June 9, 2022, the Official Committee of
6 Unsecured Creditors (the “Committee”) was appointed by the Office of the United States Trustee
7 (“US Trustee”) pursuant to section 1102 of the Bankruptcy Code.

8 7. The Debtor was originally formed as a California business and operated near
9 Bakersfield, California from its formation in 1996 until 2002. ECF No. 383, ¶ 29. In 1998, the Debtor
10 purchased real property located at 1 Front Sight Road, Pahrump, Nevada 89061 (the “Front Sight
11 Property”) and began building what is now the finest and largest private firearms training facility in
12 the world. *Id.*

13 8. The Front Sight Property is accessed by a four-mile, two lane paved road, and is
14 currently comprised of 50 outdoor firearms training ranges, live fire tactical training simulators, an
15 8,000 square foot classroom and pro shop, and assorted accessory buildings, bathrooms, three water
16 wells and thousands of square yards of completed grading for future development (the “Front Sight
17 Firearms Facility”). *Id.*, ¶ 30.

18 9. The Debtor provides firearms training courses which promote the defensive use of
19 various firearms. Courses are offered to the general public, members of law enforcement and military
20 members. *Id.*, ¶ 31. The Front Sight Firearms Facility is the most successful of its type in the United
21 States. *Id.* The Debtor provides classes and instruction annually to upward of 40,000 gun and
22 weapons enthusiasts. *Id.* The Debtor is considered the leader in its field and provides additional
23 training and instruction for numerous city and state agencies seeking to improve performance of their
24 respective law enforcement departments. *Id.* Over the last 25 years, the Debtor has trained a million
25 students and currently has approximately 263,000 members. *Id.*

26 10. Historically, the Debtor has operated its business by selling lifetime memberships,
27 courses and ancillary products. *Id.*, ¶ 32. The Debtor’s business model centered around a major
28 expansion plan that was intended to build the Front Sight Vacation Club & Resort (vacation

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1 residences, a RV park, etc.), a retail area adjacent to the vacation club and a pavilion. *Id.* The Debtor’s
2 intent was that the discounted lifetime memberships and other promotional benefits (like “Front Sight
3 bucks” [money to be used on limited items at Front Sight], certificates [to be used for 2 day or 4-day
4 training courses], etc.) would lead to a “captive” customer base that would be more likely to take
5 advantage of the Vacation Club & Resort which would then bring increased revenue to the Debtor.
6 *Id.*

7 11. The primary factor that precipitated the filing of this bankruptcy case arose out of
8 Debtor’s prepetition business dealings with a third party. *Id.*, ¶ 33.

9 **GT’S RETENTION**

10 12. Following the Debtor’s bankruptcy filing, the Debtor’s representatives requested GT
11 to provide advice and legal documentation for the Debtor’s membership program whereby members
12 would get access to and benefits at the Front Sight Property shooting facilities.

13 13. On August 29, 2022, the Debtor filed its Application to Employ GT as Special Counsel
14 (ECF No. 329) (the “Employment Application”), effective August 5, 2022, which was approved by
15 the Court by order dated October 19, 2022 (ECF No. 425).

16 14. As stated in the Employment Application, the Debtor retained GT “to provide legal
17 advice and assistance related to developing a membership plan and drafting membership agreement
18 templates and related documentation.” ECF No. 329, ¶ 16. Furthermore, the Debtor “selected GT
19 based on its extensive experience in structuring and developing membership programs in the context
20 of business reorganizations under chapter 11 of the Bankruptcy Code.” *Id.*, ¶ 13.

21 15. A copy of GT’s statement of qualifications, which includes certain summaries of the
22 background, education, and professional experience for Jim Mace and Mark Hillier, the GT attorneys
23 primarily handling this matter, is attached hereto as **Exhibit 1**.

24 **STATEMENT OF SERVICES RENDERED**

25 16. Attached hereto as **Exhibit 2** are GT’s contemporaneous billing records. In
26 accordance with Federal Rule of Bankruptcy Procedure 2016, these records reflect in detail (1) the
27 services rendered by GT, (2) the time expended, and (3) the amounts requested.

28 ///

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1 17. To summarize the services rendered by GT during the Fee Period, GT participated in
2 numerous calls with the Debtor and its legal representation; drafted multiple membership documents,
3 including membership agreements, membership addenda, and Rules and Regulations for use by the
4 Debtor with the Front Sight membership program; and prepared numerous interoffice memoranda
5 regarding membership club issues raised by the Debtor.

6 18. As set forth in the Mace Declaration, GT's attorneys diligently worked to coordinate
7 and facilitate the efficient prosecution of this matter. In addition, GT was uniquely qualified to
8 represent the Debtor in this capacity as its attorneys are very experienced in this highly specialized
9 area of law.

10 19. As stated, Jim Mace and Mark Hillier handled this matter along with Beth Gripor,
11 paralegal. Ms. Gripor's hourly rate was \$390, Mr. Hillier's was \$700, and Mr. Mace's was \$835.
12 Mr. Mace billed a total of 3.7 hours to the file, Mr. Hillier billed 13.8, and Ms. Gripor billed 18.4
13 hours. None of these hourly rates were increased during the case.

14 **SUMMARY OF COMPENSATION FOR PROFESSIONAL SERVICES**

15 20. As reflected on Exhibit 2, GT spent a total of 35.9 hours during the Fee Period,
16 resulting in a total of \$19,925.50 in fees. The blended rate for the work GT performed is
17 approximately \$555.03 per hour. The blended rate for only attorney time was approximately \$728.54.
18 Because all of the time entries set forth on Exhibit 2 relate to drafting and preparing numerous
19 documents in furtherance of the Debtor's membership program, they can all be categorized as
20 Business Operations under the *Guidelines for Reviewing Applications for Compensation and*
21 *Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11*
22 *Cases.*

23 21. GT anticipates that it will have spent an additional 9 hours preparing and filing this
24 Fee Application. Using the same overall blended rate of \$555.03 for this estimated work, GT
25 respectfully requests an additional \$5,000 in estimated fees for the preparation and filing of this Fee
26 Application.

27 22. GT does not request any expenses.

28 ///

1 23. Accordingly, GT requests allowance of fees for services as special counsel to the
2 Debtor in the total amount of \$24,925.50.

3 24. No payments have been made to GT in any capacity whatsoever in connection with
4 this case.

5 25. GT entered into no agreement and made no understanding, formal or otherwise, with
6 any person or entity concerning the sharing of compensation to be received, except as among the
7 principals of GT.

8 **THE COURT SHOULD ALLOW THE REQUESTED COMPENSATION**

9 26. Section 330 provides that a court may award a professional employed pursuant to
10 Section 327 “reasonable compensation for actual, necessary services rendered . . . and reimbursement
11 for actual, necessary expenses.” 11 U.S.C. § 330(a)(1). Section 330(a)(3) elaborates that “[i]n
12 determining the amount of reasonable compensation to be awarded to [a] . . . professional person, the
13 court shall consider the nature, the extent, and the value of such services, taking into account all
14 relevant factors, including” each of the following:

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

25 11 U.S.C. § 330(a)(3).

26 27. “A customary review of a fee application under § 330 starts with a determination of
27 the ‘lodestar,’ by multiplying a reasonable number of hours expended by a reasonable hourly rate.”
28 *Unsecured Creditors’ Committee v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th Cir. 1991);

1 *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983). In addition, a bankruptcy court examines the
2 circumstances and manner in which services are performed and results achieved to determine a
3 reasonable fee. *See Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswick Drug Co. (In re Mednet)*,
4 251 B.R. 103, 108 (B.A.P. 9th Cir. 2000). Such examination includes a review of the following
5 factors:

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

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

15 28. In the present case, all of the above factors weigh in favor of allowing GT's requested
16 compensation. First, as reflected on Exhibit 2 and the Mace Declaration, the time spent on the
17 services GT rendered was reasonable given the novelty and complexity of the issues involved.
18 Second, GT charges hourly rates that are similar to, if not lower than, those rates charged by
19 comparable law firms for similar legal services, and the rates charged were the same rates agreed
20 upon and disclosed in the application to employ GT. In addition, at the time GT rendered the services,
21 they were necessary to the administration of or beneficial to the completion of this bankruptcy case.
22 Although the Debtor and its legal representation have since changed course and strategy, at the time
23 the services were rendered, they were necessary and beneficial to the estate. As reflected on Exhibit
24 1, GT's professionals are highly experienced in developing and structuring membership programs
25 such as the those they were asked to prepare in this case. Finally, GT's services were authorized,
26 adequately documented, and GT's professionals exercised diligent billing judgment to avoid
27 duplication of efforts or unnecessary billing. GT respectfully submits that its compensation should
28 be allowed by this Court.

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CONCLUSION

GT respectfully requests that the Court enter an order: (i) approving the allowance and authorizing Debtor to pay \$24,925.50 to GT for necessary professional services rendered during the Fee Period; and (ii) for such other and further relief as the Court may deem just and proper.

DATED this 20th day of October, 2022.

GREENBERG TRAURIG, LLP

/s/ Michael R. Hogue

MICHAEL R. HOGUE, ESQ.

Nevada Bar No. 12400

ELLIOT T. ANDERSON, ESQ.

Nevada Bar No. 14025

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of October, 2022, a true and correct copy of the foregoing was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s EM/ECF system, and parties may access this filing through the Court’s CM/ECF system.

/s/Andrea Flintz
An employee of Greenberg Traurig, LLP

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EXHIBIT “1”

EXHIBIT “1”



Jim Mace

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Jim Mace, Managing Shareholder of the firm's Las Vegas office, focuses his practice in the development, acquisition and disposition of virtually all asset classes of real estate. He represents private equity funds, developers and other investors and operators in the acquisition, financing, development, sale and leasing of commercial properties, including mixed use projects, resort hotels, retail assets, multi-family projects, timeshare developments, condominium properties, golf courses and strategic land sites.

Concentrations

- Acquisition, development, financing and operation of real estate projects of all types
- Land use and the development regulatory process
- Design, structure, regulatory compliance and financing for mixed use, timeshare, condominium, retail and resort hotel projects

Capabilities

[Real Estate](#) | [Real Estate Finance](#) | [Hospitality](#) | [Land Use](#)

Experience

Acquisitions

- Represented Crestview Partners in connection with the acquisition of Emerald EMS, an electronics manufacturing services provider specializing in high-mix, low-volume engineering, design, prototyping, testing, assembly and lifecycle support services for blue-chip original equipment manufacturers across a range of end markets.
- Represented Blackstone Real Estate Income Trust (BREIT) in a BREIT-led joint venture with MGM Growth Properties LLC to acquire the Las Vegas real estate assets of MGM Grand and Mandalay Bay for \$4.6 billion.
- Represented Blackstone Real Estate Income Trust (BREIT) in a BREIT-led joint venture with MGM Resorts International to acquire the real estate assets of the Bellagio for \$4.25 billion in a sale-leaseback transaction.

- Represented Black Dragon Capital in connection with its acquisition of Grass Valley, a leading technology supplier of advanced broadcast and media solutions, with operations in over 20 different jurisdictions worldwide.
- Represented an affiliate of Centre Partners in connection with its acquisition of Boomerang Laboratories, Inc., a manufacturer of liquid products for personal care, household and pharmaceutical use.
- Represented Blue Wolf Capital Partners, LLC in connection with its acquisition of Kirlin Design Build LLC, one of the country's leading engineering and construction companies, focused on large, complex federal and private sector projects.
- Represented Centre Partners in connection with its sale of Stonewall Kitchen, a leading manufacturer of premium branded specialty food and gift products, including jams, olive oils, bottled sauces, crackers and pancake mixes.
- Represented Blue Wolf Capital Partners, LLC in connection with its acquisition of RHA Health Services, a leading provider of community-based health services focused on individuals with intellectual and developmental disabilities, behavioral health needs and substance use challenges.
- Represented WeWork in connection with its acquisition of Emprenurban, a Latin American-based real estate development and construction company.
- Represented Orange Lake Holdings, LLP with the acquisition of Silverleaf Resorts, Inc. from an affiliate of Cerberus Capital Management, L.P. Orange Lake Holdings, LLP is home to the Holiday Inn Club Vacations brand.
- Represented several gaming companies in the acquisition and disposition of hotel-casinos.

Development

- Represented the developer of casino-hotel, condominium, condominium hotel and retail exceeding \$8 billion in cost.
- Represented the developer of a casino-hotel, condominium hotel and retail development exceeding \$3 billion in cost.
- Represented various developers of condominium hotels exceeding \$3 billion in cost.
- Represented the developer of a condominium project exceeding \$800 million in cost.
- Represented the developer of an approximate 100-acre lifestyle retail project.

Military Experience

- Served, U.S. Army, 82nd Military Police Company, 82nd Airborne Division

Recognition & Leadership

Awards & Accolades

- Listed, *The Best Lawyers in America*, Real Estate Law; Land Use and Zoning Law, 2006-2023

- Listed, *Chambers USA Guide*, 2002-2022
- Team Member, *Chambers & Partners USA Real Estate Law Firm of the Year*, 2013, 2017-2018, and 2022
- Listed, *VEGAS INC*, "Top Lawyers," Real Estate, 2013, 2021
- Team Member, a *Law360* "Hospitality Practice Group of the Year," 2018, 2020, and 2021
- Listed, *Super Lawyers* magazine, *Mountain States Super Lawyers*, 2005-2019
- Team Member, a U.S. News - Best Lawyers[®], "Law Firm of the Year" in Real Estate Law, 2015
- Team Member, *The Legal 500 United States*, "Top Tier" Firm in Real Estate, 2013 and 2014
- Team Member, a *Law360* "Real Estate Practice Group of the Year," 2012-2013 and 2015
- Rated, AV Preeminent[®] 5.0 out of 5.0

°AV[®], AV Preeminent[®], Martindale-Hubbell DistinguishedSM and Martindale-Hubbell NotableSM are certification marks used under license in accordance with the Martindale-Hubbell[®] certification procedures, standards and policies.

Professional & Community Involvement

- Court Appointed Special Advocate (CASA) Clark County, Nevada District Court, Family Division
- Trustee Member, American Resort Development Association (ARDA)
- Board Member, Child Focus, Inc.
- Board Member, St. Jude's Ranch for Children
- Member, Clark County Bar Association
- Member, The Florida Bar
- Member, New York State Bar
- Member, State Bar of Nevada

Credentials

Education

- J.D., *cum laude*, Syracuse University College of Law, 1983
- B.A., State University of New York at Buffalo, 1981

Admissions

- Nevada
- Florida
- New York

News, Insights & Events

May 20, 2022 PRESS RELEASE

Greenberg Traurig Advises Affiliate of Blackstone Real Estate Income Trust in Acquisition of The Cosmopolitan of Las Vegas

June 28, 2021 PRESS RELEASE

Eight Greenberg Traurig Attorneys are Among Vegas Inc's Top Lawyers

May 24, 2021 PRESS RELEASE

8 Greenberg Traurig Nevada Attorneys & 4 Practices Areas Ranked in 2021 Chambers USA Guide

February 14, 2020 PRESS RELEASE

Greenberg Traurig Provides Counsel to Blackstone Real Estate Income Trust in Joint Venture's Acquisition of MGM Grand and Mandalay Bay Real Estate

November 15, 2019 PRESS RELEASE

Greenberg Traurig Provides Nevada and Gaming Counsel to Blackstone Real Estate Income Trust in Acquisition of Bellagio Real Estate

October 16, 2019 PRESS RELEASE

Greenberg Traurig Represents Blue Wolf Capital in connection with its Acquisition of Kirlin Design Build

August 20, 2019 PRESS RELEASE

16 Greenberg Traurig Las Vegas Attorneys Listed in the 2020 Edition of Best Lawyers in America

August 12, 2019 MEDIA COVERAGE

GT attorneys recognized in 'The Notes: Legal, Aug. 12, 2019'

August 05, 2019 PRESS RELEASE

GT Represents Centre Partners in its Sale of Stonewall Kitchen

August 05, 2019 PRESS RELEASE

Greenberg Traurig Represents Blue Wolf Capital in Acquisition of RHA Health Services

May 15, 2019 PRESS RELEASE

Greenberg Traurig Represents Blue Wolf Capital and Peloton Equity on Formation and Launch of ClearSky Health and Acquisition of 3 Inpatient Rehabilitation Facilities

May 09, 2019 PRESS RELEASE

7 Greenberg Traurig Las Vegas Attorneys & 4 Practices Included in 2019 Chambers USA Guide

April 12, 2019 PRESS RELEASE

Greenberg Traurig Represents Orange Lake Resorts in Connection with a New 5-year, \$500 Million Credit Facility

April 12, 2019 PRESS RELEASE

Greenberg Traurig Advises Orange Lake Resorts and Wilson Family on Sale of a Significant Minority Investment

June 13, 2018 PRESS RELEASE

15 Attorneys Listed as 2018 Mountain States Super Lawyers and Rising Stars



Mark D. Hillier

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Mark D. Hillier has worked in several architectural, land planning, legal, and consulting firms in the Recreational and Hospitality Practice since 1992. Mark is experienced in the areas of recreation and hospitality law, corporate, real estate, timeshare, infrastructure, securities, and taxation and has been active in events of the Urban Land Institute (ULI) Southeastern/Caribbean Council and the national ULI. Mark also has experience in structuring private residence and fractional membership programs, infrastructure cost recovery programs, conservation easements, marina slip membership programs, resort membership programs, community based and stand-alone golf and country club membership programs in the United States, Canada, the Caribbean and Mexico.

Concentrations

- Recreation and hospitality law
- Real estate
- Taxation
- Corporate law
- Securities
- Land development

Capabilities

[Real Estate](#) | [Hospitality](#) | [American Indian Law](#)

Experience

Representative Matters

- Represented land developers, amenity owners and member groups in structuring club membership programs including:
 - Formulating new specialized stand-alone clubs (such as International Polo Club Palm Beach in Florida and The Shoals Club in North Carolina)
 - Restructuring existing golf, country and resort clubs to fund amenity expansions and renovations and increase cash flow (The Club at PGA West in California, Dorado Beach in Puerto Rico, Muirfield Golf Club in Ohio and Royal Palm Yacht & Country Club in Florida)
 - Structuring community-based private, semi-private, and resort clubs to accelerate residence and

homesite absorption (Timberline Golf Club in Alabama, The Grand Golf Club in California and Shooting Star in Wyoming)

- Designing and documenting slip membership programs that enabled marina owners to capitalize on marina investments (Sunset Harbour Yacht Club in Florida)
- Researched Do-Not-Call legislation and prepared club marketing strategy that incorporated new telephone contact restrictions.
- Represented land developers and amenity owners in negotiating amenity access agreements and hotel management agreements.
- Represented land developers and amenity owners in designing Founder Membership Programs to fund facilities construction.
- Represented land developers and resort owners in registering projects with land sales and timeshare regulators.
- Represented land developers in structuring conservation easements.

Internships

- Intern, Victor S. Johnson III, District Attorney General, Nashville, TN, 1998-1999
- Intern, Congresswoman Ileana Ros-Lehtinen, Washington, D.C., 1996-1997

Recognition & Leadership

Awards & Accolades

- Team Member, a *Law360* "Hospitality Practice Group of the Year," 2021
- Team Member, *Chambers & Partners USA* Real Estate Law Firm of the Year, 2010, 2017-2018, and 2022
- Team Member, a U.S. News - Best Lawyers[®], "Law Firm of the Year" in Real Estate Law, 2015
- Team Member, *The Legal 500 United States*, "Top Tier" Firm in Real Estate, 2013 and 2014
- Team Member, a *Law360* "Real Estate Practice Group of the Year," 2011-2013 and 2015

Professional & Community Involvement

- Full Member, Urban Land Institute, 2000-Present
 - Southeast Florida and Caribbean District Council, Executive Committee, 2004-Present
 - Chair, Young Leaders Group Committee, 2003-2004
 - Recreational Development Council, Red Flight, 2003-Present
- Member, American Bar Association, 2000-Present
- Member, Phi Delta Phi Legal Fraternity, 1998-Present

Credentials

Education

- J.D., Vanderbilt University Law School, 2000
 - President, The Federalist Society
 - President, Criminal Law Society
 - Member, Business Law Society
 - Member, Entertainment Law Society
- B.A., American University, 1997

Admissions

- Florida

Languages

- Spanish

News, Insights & Events

October 11, 2021, 8:00 AM - October 14, 2021, 4:00 PM ET EVENT

Urban Land Institute (ULI) Fall Meeting

May 20, 2015 GT ALERT

CFPB's First ILSA Enforcement Action

EXHIBIT “2”

EXHIBIT “2”



Page : 1
 Date : September 6, 2022
 Client No. : 210254.010100
 Invoice No. : 1000073598
 Tax ID : [REDACTED]

Front Sight Management LLC
 1 Front Sight Road
 Pahrump, NV 89061

Membership Agreements

07/22/22	MDH	Prepare information request.	0.50 hrs.	350.00
07/25/22	JM	Addressed membership agreement issues.	0.50 hrs.	417.50
08/03/22	MDH	Review S. Sefflin interoffice memoranda; prepare agenda; prepare for call.	1.50 hrs.	1,050.00
08/03/22	JM	Reviewed membership club issues and drafted correspondence to Mark Hillier re same.	0.50 hrs.	417.50
08/04/22	MDH	Review I. Piazza interoffice memorandum; telephone conference with J. Mace; prepare for call; telephone conference with I. Piazza, J. Mace and team.	1.80 hrs.	1,260.00
08/04/22	JM	Reviewed correspondence re membership plan and T/Cs with Mark Hillier and Greg Garman re same. Attended call with client and client representatives re membership plan issues. T/C Mark Hillier re same.	1.80 hrs.	1,503.00
08/05/22	MDH	Prepare membership documents.	0.60 hrs.	420.00
08/05/22	JM	Correspondence with Dr. Ignatius Piazza and Greg Garman.	0.20 hrs.	167.00
08/08/22	BRG	Prepare membership documents.	0.90 hrs.	351.00
08/08/22	MDH	Prepare membership documents.	1.60 hrs.	1,120.00
08/09/22	MDH	Prepare membership documents.	1.00 hrs.	700.00

JM:TKK



Page : 2

Date : September 6, 2022

Client No. : 210254.010100

Invoice No. : 1000073598

Tax ID : [REDACTED]

08/10/22	BRG	Prepare membership documents.	1.30 hrs.	507.00
08/10/22	MDH	Prepare membership documents.	0.60 hrs.	420.00
08/11/22	BRG	Prepare membership documents.	1.70 hrs.	663.00
08/11/22	MDH	Prepare club documents.	0.50 hrs.	350.00
08/12/22	BRG	Prepare membership documents.	3.20 hrs.	1,248.00
08/12/22	MDH	Prepare membership documents.	1.00 hrs.	700.00
08/14/22	BRG	Prepare membership documents.	0.30 hrs.	117.00
08/15/22	BRG	Prepare membership documents.	2.80 hrs.	1,092.00
08/15/22	MDH	Review document comments; prepare revised membership documents.	1.10 hrs.	770.00
08/16/22	BRG	Prepare membership documents.	0.10 hrs.	39.00
08/16/22	MDH	Prepare membership documents.	0.10 hrs.	70.00
08/17/22	BRG	Prepare membership documents.	1.90 hrs.	741.00
08/17/22	MDH	Prepare revised membership documents.	0.50 hrs.	350.00
08/18/22	BRG	Prepare membership documents.	0.40 hrs.	156.00
08/18/22	JM	Correspondence with debtor's counsel.	0.20 hrs.	167.00
08/19/22	BRG	Prepare membership documents.	0.70 hrs.	273.00
08/19/22	MDH	Prepare membership documents.	0.20 hrs.	140.00
08/22/22	BRG	Prepare membership documents.	0.80 hrs.	312.00
08/22/22	MDH	Review I. Piazza interoffice memorandum; prepare revised addenda and agreement.	0.90 hrs.	630.00

JM:TKK



Page : 3

Date : September 6, 2022

Client No. : 210254.010100

Invoice No. : 1000073598

Tax ID : XXXXXXXXXX

08/22/22	JM	Correspondence with Mark Hillier re management agreement.	0.20 hrs.	167.00
08/23/22	MDH	Prepare rules.	0.50 hrs.	350.00
08/23/22	JM	T/C Mark Hillier re management agreement issues and reviewed same.	0.30 hrs.	250.50
08/25/22	MDH	Review J. Wellington and C. Januska interoffice memoranda; attention to documents.	0.10 hrs.	70.00
08/30/22	MDH	Prepare B. Ackman interoffice memorandum; attention to Rules.	0.20 hrs.	140.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate</u>	<u>Total</u>
Mark D. Hillier	12.70	700.00	8,890.00
James Mace	3.70	835.00	3,089.50
Beth R. Gripor	14.10	390.00	5,499.00
TOTAL:	30.50	573.07	\$17,478.50

Current Services Rendered: \$ 17,478.50

Total Current Fees and Expenses: \$ 17,478.50

JM:TKK



Page : 4
Date : September 6, 2022
Client No. : 210254.010100
Invoice No. : 1000073598
Tax ID : [REDACTED]

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: FRONT SIGHT MANAGEMENT LLC
FILE NUMBER: 210254.010100
INVOICE NUMBER: 1000073598*
BILLING PROFESSIONAL: James Mace

Current Invoice:	\$	17,478.50
Total Amount Due:	\$	17,478.50

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: [REDACTED]
ABA #: [REDACTED]

For ACH Instructions:

Bank: [REDACTED]
ABA#: [REDACTED]

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: [REDACTED]

PLEASE

REFERENCE: **CLIENT NAME:** FRONT SIGHT MANAGEMENT LLC
FILE NUMBER: 210254.010100
INVOICE NUMBER: 1000073598*
BILLING
PROFESSIONAL: James Mace

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

JM:TKK



Page : 5
Date : September 6, 2022
Client No. : 210254.010100
Invoice No. : 1000073598
Tax ID : [REDACTED]

JM:TKK



Page : 1
 Date : October 4, 2022
 Client No. : 210254.010100
 Invoice No. : 1000098010
 Tax ID : [REDACTED]

Front Sight Management LLC
 1 Front Sight Road
 Pahrump, NV 89061

Membership Agreements

09/06/22	MDH	Prepare B. Ackman interoffice memorandum.	0.10 hrs.	70.00
09/07/22	MDH	Review B. Ackman interoffice memorandum; prepare revised membership documents.	0.20 hrs.	140.00
09/19/22	BRG	Prepare membership documents.	4.30 hrs.	1,677.00
09/19/22	MDH	Review E. McDonald interoffice memorandum; prepare revised rules.	0.70 hrs.	490.00
09/21/22	MDH	Prepare rules.	0.10 hrs.	70.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate</u>	<u>Total</u>
Mark D. Hillier	1.10	700.00	770.00
Beth R. Gripor	4.30	390.00	1,677.00
TOTAL:	5.40	453.15	\$2,447.00

Current Services Rendered: \$ 2,447.00

Total Current Fees and Expenses: \$ 2,447.00

Previous Balance (see attached statement): \$ 17,478.50

Total Amount Due: \$ 19,925.50

JM:TKK



Page : 2
Date : October 4, 2022
Client No. : 210254.010100
Invoice No. : 1000098010
Tax ID : [REDACTED]

JM:TKK



Page : 3
Date : October 4, 2022
Client No. : 210254.010100
Invoice No. : 1000098010
Tax ID : [REDACTED]

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
09/06/22	1000073598	17,478.50	0.00	0.00	17,478.50
	Totals:	\$ 17,478.50	\$ 0.00	\$ 0.00	\$ 17,478.50

JM:TKK



Page : 4
Date : October 4, 2022
Client No. : 210254.010100
Invoice No. : 1000098010
Tax ID : [REDACTED]

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: FRONT SIGHT MANAGEMENT LLC
FILE NUMBER: 210254.010100
INVOICE NUMBER: 1000098010*
BILLING PROFESSIONAL: James Mace

Current Invoice:	\$	2,447.00
Previous Balance:	\$	17,478.50
Total Amount Due:	\$	19,925.50

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: [REDACTED]
ABA #: [REDACTED]

For ACH Instructions:

Bank: [REDACTED]
ABA#: [REDACTED]

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: [REDACTED]

PLEASE

REFERENCE: **CLIENT NAME:** FRONT SIGHT MANAGEMENT LLC
FILE NUMBER: 210254.010100
INVOICE NUMBER: 1000098010*
BILLING
PROFESSIONAL: James Mace

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

JM:TKK



Page : 5
Date : October 4, 2022
Client No. : 210254.010100
Invoice No. : 1000098010
Tax ID : [REDACTED]

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

JM:TKK

NVB 2016 (05/2022)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

Fee Application Cover Sheet

Case No.: 22-11824-abl Chapter: 11 Hearing Date/Time: 11/18/2022 09:30

Debtor: Front Sight Management LLC

Applicant: Greenberg Traurig, LLP

Date of Employment: August 5, 2022

Interim Fee Application No: _____ OR Final Fee Application X

Amounts Requested:

Client Approval: Yes No

Fees: \$ 24,925.50

Expenses: \$ 0.00

Total: \$ 24,925.50

Hours: 44.90

Blended Rate: \$ 555.03

Fees Previously Requested: \$ 0.00

Awarded: \$ 0.00

Expenses Previously Requested: \$ 0.00

Awarded: \$ 0.00

Total Previously Requested: \$ 0.00

Awarded: \$ 0.00

Total Amount Paid: \$ 0.00

Chapter 13 Cases ONLY:

Yes No Elected to accept the Chapter 13 Presumptive Fee pursuant to LR 2016.2, and filed the "Notice of Election to Accept the Presumptive Fee" on _____.

Yes No Participated in the Mortgage Mediation Program: **If yes**, amount received: \$ _____

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

/s/ Michael R. Hogue
Signature

Date October 20, 2022