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7 Attorneys for Chapter 11 Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**
 9 **FOR THE DISTRICT OF NEVADA**

<p>11 In re:</p> <p>12 Front Sight Management LLC,</p> <p>13</p> <p>14 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: January 9, 2023 Hearing Time: 9:30 a.m.</p>
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17 **NOTICE OF HEARING ON DEBTOR’S THIRD OMNIBUS OBJECTION (1) REDUCING**
 18 **AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND**
 19 **EXPUNGING CERTAIN OTHER MEMBER CLAIMS**

20 **PLEASE TAKE NOTICE** that a hearing will be held on **January 9, 2023 at 9:30 a.m.**
 21 before the Honorable August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1
 22 located at 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to
 23 consider the *Third Omnibus Objection (1) Reducing and Allowing Certain Member Claims and (2)*
 24 *Disallowing and Expunging Certain Other Member Claims* [ECF No. 442] (the “Omnibus
 25 Objection”) filed by Front Sight Management LLC, the chapter 11 debtor and debtor in possession
 26 herein (the “Debtor”), pursuant to which the Debtor seeks entry of an order sustaining the Omnibus
 27 Objection, under Section 502(b) and pursuant to Bankruptcy Rule 3007(d)(1) and Local Rule 3007,
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1 and reducing certain claims and disallowing certain claims filed by certain of the Debtor's members.

2 Hearing information is available at <https://www.nvb.uscourts.gov/case-info/mega-cases/>.

3 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and the
 4 supporting declaration of Ignatius Piazza may be obtained from the Court, located at the Foley
 5 Federal Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, through the Court's
 6 electronic filing system (<https://ecf.nvb.uscourts.gov/>), for free at the Debtor's noticing agent's
 7 website <https://cases.stretto.com/FrontSight> or by sending a written request to counsel for the
 8 Debtor, Susan K. Seflin, via email at sseflin@bg.law. If the Omnibus Objection pertains to you, you
 9 should have received a copy in the mail with this Notice.

10 **PLEASE TAKE FURTHER NOTICE** that, the Omnibus Objection, the Debtor seeks to
 11 object to the following claims filed by the following claimants:

Claimant	Claim No.	Claim Amount	Proposed Treatment
Brian Lorenz	3-1	\$12,000.00	Allow as a \$4,943 general unsecured claim.
Brett Swaim	5-1	\$10,000.00	Allow as a \$5,788 general unsecured claim.
Kevin Conway	10-1	\$60,900.00	Disallow claim in its entirety.
Andrew Kisse	13-1	\$60,000.00	Allow as a \$99 general unsecured claim.
Richard F. Marz	14-1	\$22,074.00	Allow as a \$7,387 general unsecured claim.
Jennifer Shockley	23-1	\$10,000.00	Disallow claim in its entirety.
Elizabeth Shockley	25-1	\$10,000.00	Disallow claim in its entirety.
Greg Raven	52-1	\$11,974.50	Allow as a \$3,163 general unsecured claim.
Victor Reilley	61-1	\$10,000.00	Allow as a \$896 general unsecured claim.
Stan Hilton	69-1	\$10,000.00	Allow as a \$6,618 general unsecured claim.
Paul Davidson	71-1	\$15,000.00	Allow as a \$10,400 general unsecured claim.
Nick Voth	73-1	\$10,000.00	Allow as a \$1,497 general unsecured claim.
Brian Levy	75-1	\$53,000.00	Allow as a \$4,893 general unsecured claim.
Geoffrey Hicks	79-1	\$10,000.00	Disallow claim in its entirety.
Maryann Hicks	80-1	\$10,000.00	Allow as a \$99 general unsecured claim.

	Claimant	Claim No.	Claim Amount	Proposed Treatment
1	Angela Hicks	81-1	\$10,000.00	Disallow claim in its entirety.
2	Michael Langiano	85-1	\$10,000.00	Disallow claim in its entirety.
3	Robert Waggoner/ Rob Waggoner	96-1	\$21,646.00	Allow as a \$32,475 general unsecured claim.
4	Leman W. Pendley	98-1	\$50,000.00	Allow as a \$20,041.80 general unsecured claim.
5	Jodie Yelton	99-1	\$12,997.00	Allow as a \$9,736 general unsecured claim.
6	Harry DeWolf	119-1	\$83,892.20	Allow as a \$4,840 general unsecured claim.
7	Matthew Seavey	127-1	\$80,000.00	Allow as a \$700 general unsecured claim.
8	Steven C. Peterson	130-1	\$12,000.00	Disallow claim in its entirety.
9	Andi Rausch	132-1	\$68,800.00	Allow as a \$99 general unsecured claim.
10	Jeff Rausch	133-1	\$60,000.00	Allow as a \$549 general unsecured claim.
11	Greg Raven	137-1	\$11,974.50	Disallow claim in its entirety.
12	Mark Welitzkin	139-1	\$10,000.00	Disallow claim in its entirety.
13	1801 Labrador St (Mary Cutaia)	140-1	\$10,000.00	Disallow claim in its entirety.
14	Maraya Tamera Evans	142-1	\$4,800.00	Disallow claim in its entirety.
15	Charles Evans	143-1	\$4,800.00	Allow as a \$399 general unsecured claim.
16	Patricia M. Passaretti	153-1	\$60,000.00	Disallow claim in its entirety.
17	Steven Carr	156-1	\$16,361.00	Allow as a \$7,339 general unsecured claim.
18	Robert Rosen	159-1	\$77,750.00	Allow as a \$1,400 general unsecured claim.
19	Michael P. Kauffman	160-1	\$25,000.00	Disallow claim in its entirety.
20	Kiril P. Boyadjieff	170-1	\$20,000.00	Disallow claim in its entirety.
21	Robert Waggoner/ Rob Waggoner	171-2	\$21,646.00	Disallow claim in its entirety.
22	Richard Faulk	178-1	\$12,000.00	Allow as a \$50 general unsecured claim.
23	Terry O'Reilly	197-1	\$50,000.00	Disallow claim in its entirety.
24	Greg Raven	200-1	\$12,042.00	Disallow claim in its entirety.
25	Catherine A. Tardy	204-1	\$82,213.03	Allow as a \$6,240 general unsecured claim.
26	Rick Mantin	212-1	\$34,689.00	Allow as a \$22,138 general unsecured claim.

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Claimant	Claim No.	Claim Amount	Proposed Treatment
Ward Stringham	220-1	\$50,000.00	Disallow claim in its entirety.
Allyson Harriss	221-1	\$60,800.00	Disallow claim in its entirety.
Jorge Ragde	230-1	\$22,000.00	Disallow claim in its entirety.
Patrick Joseph Hughes	233-1	\$10,000.00	Allow as a \$999 general unsecured claim.
Joshua Morrison (deceased) & Tacy Morrison	236-1	\$54,910.00	Allow as a \$47,067 general unsecured claim.
Valerie Ann Wade	242-1	\$14,940.00	Allow as a \$8,870 general unsecured claim.
Matthew Lewis	255-1	\$87,070.00	Allow as a \$52,932 general unsecured claim.
Uzzell S. Branson IV	262-1	\$15,000.00	Allow as a \$448 general unsecured claim.
Michael G. Jones	263-1	\$43,520.00	Allow as a \$38,587 general unsecured claim.
Gary Krystof	265-1	\$12,234.00	Allow as a \$2,739 general unsecured claim.
Ronald R. Webb	266-1	\$15,000.00	Allow as a \$1,347 general unsecured claim.
Brian Pavey	270-1	\$58,135.00	Allow as a \$43,098 general unsecured claim.
Matthew A. Lockitski	272-1	\$10,000.00	Disallow claim in its entirety.
Anthony Sgarlatti	273-1	\$32,890.32	Allow as a \$11,692 general unsecured claim.
Randall R. Webb	285-1	\$50,000.00	Allow as a \$15,545 general unsecured claim.
Melissa Ramiso Lewis	288-1	\$15,000.00	Disallow claim in its entirety.
Kortney Otten	290-1	\$15,000.00	Disallow claim in its entirety.
Logan Mitchell Lewis	292-1	\$60,000.00	Allow as a \$548 general unsecured claim.
Douglas R. Bonney	293-1	\$70,000.00	Disallow claim in its entirety.
Mark Collins Founding Member	316-1	\$10,000.00	Allow as a \$1,145 general unsecured claim.
Raymond W. Connors	322-1	\$60,000.00	Disallow claim in its entirety.
Leonard Yutaka Ishiguro	364-1	\$18,000.00	Allow as a \$2,988 general unsecured claim.
William Turner	394-1	\$74,350.00	Allow as a \$3,987 general unsecured claim.
Joseph Van Bruaene	405-1	\$29,297.00	Allow as a \$15,187 general unsecured claim.
Jonathan Paul Gunzel	417-1	\$68,500.00	Allow as a \$6,294 general unsecured claim.

Claimant	Claim No.	Claim Amount	Proposed Treatment
Life on Your Terms, Inc.	420-1	\$21,235.00	Allow as a \$4,597 general unsecured claim.
John C. Lindsey	431-1	\$11,000.00	Allow as a \$5,786 general unsecured claim.
Liza Pitch	441-1	\$40,000.00	Disallow claim in its entirety.
Kevin G. Miller	461-1	\$17,400.00	Allow as a \$1,500 general unsecured claim.
Cameron Ruppe	464-1	\$86,334.89	Allow as a \$14,661 general unsecured claim.
Michael H. Cox	475-1	\$10,000.00	Allow as a \$7,034 general unsecured claim.
Christian Gulde	481-1	\$10,000.00	Allow as a \$3,642 general unsecured claim.
Bryant Zollinger	486-1	\$26,368.00	Allow as a \$8,026 general unsecured claim.
John F. Moran	487-1	\$80,000.00	Allow as a \$549 general unsecured claim.
Gerald Bittner Jr., Paula, Jerry III, Chloe, and Lauren Bittner	494-1	\$25,000.00	Allow as a \$1,200 general unsecured claim.
Mark Woodson	517-1	\$10,000.00	Allow as a \$448 general unsecured claim.
Clark Hatch	534-1	\$17,228.00	Allow as a \$997 general unsecured claim.
Douglas Ralston	543-1	\$50,000.00	Allow as a \$4,491 general unsecured claim.
Nola T. Hatch	566-1	\$71,250.00	Disallow claim in its entirety.
James E. Synovec	580-1	\$6,158,697.00	Allow as a \$1,497 general unsecured claim.
Michael Shapiro	593-1	\$56,000.00	Allow as a \$3,792 general unsecured claim.
Brandon Raymond	594-1	\$22,622.00	Allow as a \$2,441 general unsecured claim.
Stephen J. Waltz	597-1	\$94,070.07	Allow as a \$7,438 general unsecured claim.
Eric Stay	608-1	\$50,000.00	Allow as a \$1,394 general unsecured claim.
Robert Foelak	614-1	\$70,700.00	Allow as a \$210 general unsecured claim.

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1 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Omnibus Objection must
2 be filed pursuant to Local Rule 9014(d)(1).

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4 If you object to the relief requested, you *must* file a **WRITTEN** response to the Omnibus
5 Objection with the Court. You *must* also serve your written response on the person who sent
6 you this notice.

7 If you do not file a written response with the Court, or if you do not serve your written
8 response on the person who sent you this notice, then:

- 9 • The Court may *refuse to allow you to speak* at the scheduled hearing; and
- 10 • The Court may *rule against you* without formally calling the matter at the hearing.

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12 DATED: October 21, 2022

BG Law LLP

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14 By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

15 Attorneys for Chapter 11 Debtor and
16 Debtor in Possession
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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 **October 21, 2022**, I served the following document:

NOTICE OF HEARING ON DEBTOR’S THIRD OMNIBUS OBJECTION (1) REDUCING AND ALLOWING CERTAIN MEMBER CLAIMS AND (2) DISALLOWING AND EXPUNGING CERTAIN OTHER MEMBER CLAIMS

BY ELECTRONIC MAIL

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

- **JASON BLUMBERG** Jason.blumberg@usdoj.gov
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- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAWN M. CICA** dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
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- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **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 October 21, 2022, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY