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13 **UNITED STATES BANKRUPTCY COURT**
14 **DISTRICT OF NEVADA**

15 In re:	Case No.: 22-11824-ABL
16 Front Sight Management LLC,	Chapter 11
17 Debtor.	Confirmation Hearing: November 18, 2022 Hearing Time: 9:30 a.m. Pacific

18 **SECOND PLAN SUPPLEMENT REGARDING NOTICE OF ASSUMPTION OF**
19 **CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

20 **PLEASE TAKE NOTICE** that, on October 3, 2022, Front Sight Management LLC, the
21 Chapter 11 debtor-in-possession and plan proponent (the “**Debtor**”), filed the *Debtor’s Second*
22 *Amended Chapter 11 Plan of Reorganization* (as may be amended, supplemented, or otherwise
23 modified from time to time, the “**Plan**”) [ECF No. 405].

24 **PLEASE TAKE FURTHER NOTICE** that, on October 21, 2022, the Debtor filed its
25 *Supplement to Second Amended Chapter 11 Plan of Reorganization* (the “**First Plan**
26 **Supplement**”) [ECF No. 445].

27 **PLEASE TAKE FURTHER NOTICE** that the Debtor hereby files its *Second Plan*
28 *Supplement Regarding Notice of Assumption of Certain Executory Contracts and Unexpired*

1 Leases (the “**Second Plan Supplement**”) as set forth and in accordance with the Plan.¹

2 **PLEASE TAKE FURTHER NOTICE** that the Second Plan Supplement consists of the
3 following:

4 **Exhibit A** - Schedule of Assumed Contracts.

5 **PLEASE TAKE FURTHER NOTICE** that certain documents or portions thereof
6 contained in the Second Plan Supplement remain subject to ongoing negotiations between the
7 Debtor, Nevada PF, LLC, and certain interested parties with respect thereto. The Debtor reserves
8 all rights, subject to the terms and conditions set forth in the Plan, to amend, revise, or supplement
9 the Second Plan Supplement, and any of the documents and designations contained therein, until
10 such date as may be provided for in the Plan or an order of the Bankruptcy Court.

11 **PLEASE TAKE FURTHER NOTICE** that the hearing to consider confirmation of the
12 Plan has been scheduled for **November 18, 2022, at 9:30 AM PST**, before the Honorable August
13 B. Landis., Chief United States Bankruptcy Judge, in Courtroom 1, located in the Foley Federal
14 Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada 89101, via ZoomGov.

15 **PLEASE TAKE FURTHER NOTICE** that **November 4, 2022, at 10:00 PM PDT**, is
16 established as the date (the “**Objection Deadline**”) for filing and serving objections (the
17 “**Objections**”) to (i) confirmation of the Plan; and/or (ii) the Debtor’s proposed assumption and
18 assignment of the Assigned Contracts and related Cure Amounts under the Plan (as listed on the
19 Schedule of Assumed Contracts attached hereto as Exhibit A). Objections not filed and served by
20 the Objection Deadline in the manner set forth below may not be considered by the Bankruptcy
21 Court.

22 **PLEASE TAKE FURTHER NOTICE** that, to be considered by the Bankruptcy Court,
23
24

25
26
27 _____
28 ¹ Capitalized terms used herein, but not otherwise defined, shall have the meanings ascribed to them in the Plan.

1 Objections, if any, to the Plan and/or the assumption and assignment of the Assigned Contracts
2 and related Cure Amounts, must (a) be in writing, (b) state the name and address of the objecting
3 party and the amount and nature of the Claim or Interest of such party, (c) state with particularity
4 the basis and nature of any Objection or proposed modification (including, as applicable,
5 proposed Cure Amount modifications), and (d) be filed with the Court and served (with two
6 single-sided copies to the Court's chambers) so that they are actually received on or before the
7 Objection Deadline by: (a) the Debtor, Front Sight Management LLC, 1 Front Sight Road,
8 Pahrump, Nevada 89061; (b) counsel to the Debtor, BG Law LLP, 300 South 4th Street, Suite
9 1550, Las Vegas, Nevada 89101 (Attn: Susan K. Seflin, Esq. (sseflin@bg.law)); (c) the Office of
10 the United States Trustee for the District of Nevada, 300 Las Vegas Boulevard South, Suite 4300,
11 Las Vegas, Nevada 89101 (Attn: Mr. Edward McDonald Jr., Esq.
12 (edward.m.mcdonald@usdoj.gov)); (d) the Debtor's postpetition secured lender, FS DIP, LLC,
13 through its counsel, Schwartz Law, PLLC, 601 East Bridger Avenue, Las Vegas, Nevada 89101
14 (Attn: Samuel A. Schwartz, Esq. (saschwartz@nvfirm.com)). Objections not timely filed and
15 served in accordance with the provisions of this Notice may not be heard and may be overruled.
16
17

18 **PLEASE TAKE FURTHER NOTICE** that copies of the Plan and First and Second Plan
19 Supplements, in addition to all other pleadings in this case, may be obtained free of charge by
20 visiting the website of Stretto at <https://cases.stretto.com/FrontSight>. You may also obtain copies
21 of any pleadings by visiting the Court's website at <https://www.nvb.uscourts.gov> in accordance
22 with the procedures and fees set forth therein.
23

24 Dated: October 28, 2022

BG Law LLP

25
26 By: /s/ Susan K. Seflin

Susan K. Seflin
Attorneys for Chapter 11 Debtor in
Possession and Plan Proponent

EXHIBIT A

Schedule of Assumed Contracts

Vendor/Lessor	Description	Vendor/Lessor Address	Cure Amount
Evolution Insurance Brokers, LLC	Certificate of Insurance – Commercial Liability	8722 S. Harrison St. Sandy, UT 84070	\$0.00
Nevada Retail Network Self Insured Group	Workers' Compensation and Employers Liability Coverage	575 S. Saliman Road Carson City, NV 89701	\$0.00
Risk Placement Services	Evidence of Property Insurance	1231E Basin Road, #6 Pahrump, NV 89060	\$0.00
Scottsdale Insurance Company	Common Policy Agreement	One Nationwide Plaza Columbus, OH 43215	\$0.00
State Farm	Auto Insurance Renewal	3250 S Highway 160, Ste 1 Pahrump, NV 89048-4876	\$0.00
Maverick	Merchant Agreement	26520 Agoura Road 1st Floor Calabasas, CA 91302	\$0.00