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Honorable August B. Landis
United States Bankruptcy Judge



Entered on Docket
November 07, 2022

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

In re:

FRONT SIGHT MANAGEMENT LLC,

Debtor.

Case No.: 22-11824-ABL

Chapter 11

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

**ORDER APPROVING STIPULATION REGARDING LAS VEGAS DEVELOPMENT
FUND, LLC'S TREATMENT UNDER DEBTOR'S SECOND AMENDED CHAPTER 11
PLAN OF REORGANIZATION**

The Court has considered the *Stipulation Regarding Las Vegas Development Fund, LLC's Treatment Under Debtor's Second Amended Chapter 11 Plan of Reorganization* (the "Stipulation")¹ between and among Front Sight Management LLC (the "Debtor"), by and through its counsel BG Law; Nevada PF, LLC ("Nevada PF"), by and through its counsel, Schwartz Law;

¹ Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

1 Dr. Ignatius Piazza, Jennifer Piazza, VNV Dynasty Trust I, and VNV Dynasty Trust II
2 (collectively, the “Piazzas”), by and through their counsel, Garman Turner Gordon; and Las Vegas
3 Development Fund, LLC (“LVDF”, and together with Debtor, Nevada PF, and the Piazzas, the
4 “Parties”), by and thorough its counsel, the Law Office of Brian D. Shapiro and Jones Lovelock, and
5 good cause appearing therefor:

6 **IT IS HEREBY ORDERED:**

- 7 1. The Stipulation is approved in its entirety.
- 8 2. The Debtor and Nevada PF shall increase the LVDF Claim Reserve by \$750,000, to
9 a total of \$12,555,706.01. If the Plan is confirmed, then LVDF’s lien shall attach only to the Claim
10 Reserve of \$12,555,706.01.
- 11 3. The Plan confirmation order shall provide that the LVDF Interest Provision is stricken
12 in its entirety. For avoidance of doubt, any interest on the principal amount of the LVDF Claim shall
13 be determined in connection with the adjudication of the Claim Objections.
- 14 4. Except as stated herein, LVDF shall not be required to file an opposition to the Claim
15 Objections.
- 16 5. The Debtor, LVDF, and the Piazzas shall attend an in-person settlement conference
17 (the “Settlement Conference”) related to the LVDF Claim, Claim Objections, and Adversary
18 Proceeding on December 8 and 9, 2022 before the Honorable Peggy Leen. The cost of such
19 Settlement Conference (which shall be immediately due) shall be split 50/50 between LVDF, on the
20 one hand, and the Debtor on the other hand
- 21 6. The Debtor, LVDF, and the Piazzas shall, no later than the conclusion of the
22 Confirmation Hearing, request that the Bankruptcy Court set a firm trial date at the earliest possible
23 date to resolve the LVDF Claim, the Claim Objections, and the Adversary Proceeding.
- 24 7. If a settlement is not reached at the Settlement Conference, the Parties shall stipulate
25 to a mutually agreeable discovery and briefing schedule related to the Claim Objections and the
26 Adversary Proceeding and if unable to stipulate, then the Court shall enter a discovery and briefing
27 schedule related to the Claim Objections and the Adversary Proceeding. The briefing schedules shall
28 set forth the deadlines for LVDF to file an opposition, if necessary, to the Claim Objections.

1 8. If a settlement is not reached at the Settlement Conference, then an in-person
2 deposition of Dr. Ignatius Piazza shall take place on January 4, 2023, and a deposition of Jennifer
3 Piazza will take place via zoom or some similar format on January 3, 2023. The Parties agree that
4 these shall be firm deposition dates and will not be continued or moved absent Court order or by
5 stipulation.

6 9. LVDF shall not object to the Plan.

7 10. LVDF shall submit a ballot voting in favor of the Plan by the voting deadline of
8 November 4, 2022.

9 IT IS SO ORDERED.

10 Submitted by:

11 GARMAN TURNER GORDON LLP

BG LAW LLP

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13
14 By: /s/ Teresa Pilatowicz
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