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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

In re:

Case No. 22-11824-abl
Chapter 11

STIPLI ATION TO S

Debtor.

STIPULATION TO SUBMIT EXHIBITS UNDER SEAL IN CONNECTION WITH THE OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO CONFIRMATION OF DEBTOR'S SECOND AMENDED CHAPTER 11 PLAN OF REORGANIZATION

Hearing Date: November 18, 2022

Hearing Time: 9:30 a.m.

The Official Committee of Unsecured Creditors of Front Sight Management LLC (the "Committee") and Front Sight Management LLC ("Debtor" and together with the Committee, the "Parties"), by and through their respective undersigned counsel of record, hereby stipulate and agree as follows (the "Stipulation"):

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WHEREAS, currently pending before the Court is the *Debtor's Second Amended Chapter* 11 Plan of Reorganization [ECF No. 405] (the "Plan"). Objections to confirmation of the Plan are due on November 4, 2022.

WHEREAS, the Debtor produced certain documents to the Committee, including a schedule referencing distributions to the Debtor's shareholders between 2012 and 2020 (the "Debtor Schedule"), which was not marked confidential.

WHEREAS, the Committee intends to file an objection to confirmation of the plan (the "Committee Objection") and submit a declaration from Dundon Advisers LLC (the "Dundon Declaration") in support of the Committee Objection.

WHEREAS, the Dundon Declaration will attach two exhibits prepared by Dundon that are based on the Debtor Schedule (the "<u>Dundon Declaration Exhibits</u>").

WHEREAS, the Committee Objection will also reference certain of the information contained in the Dundon Declaration, which itself is based on the Debtor Exhibit.

WHEREAS, the Committee agrees to submit the Dundon Declaration Exhibits under seal.

WHEREAS, the Parties agree that the total amount of insider transfers referenced in the Committee Objection and the Dundon Declaration shall not be confidential.

Based on the foregoing, the Parties hereby stipulate and agree that the Dundon Declaration Exhibits shall be submitted under seal pursuant to 11 U.S.C. § 107 and LR 9018. This Stipulation is without prejudice to the foregoing and the Committee further reserves the right to challenge the designation as confidential by among other things filing a motion to unseal the Dundon Declaration Exhibits at a future date.

IT IS SO STIPULATED.

DATED this 7th day of November, 2022.

[Signatures on the next page]

1 2 CARLYON CICA CHTD. **BG LAW LLP** 3 By: /s/ Dawn M. Cica, Esq. By:/s/ Susan K. Seflin CANDACE C. CARLYON, ESQ. STEVEN T. GUBNER 4 Nevada Bar No. 2666 Nevada Bar No. 4624 SUSAN K. SEFLIN, Esq. 5 DAWN M. CICA, ESQ. Nevada Bar No. 4565 Admitted Pro Hac Vice 6 TRACY M. O'STEEN JESSICA S. WELLINGTON Nevada Bar No. 10949 Admitted Pro Hac Vice 7 265 E. Warm Springs Road, Suite 107 300 S. 4th Street, Suite 1550 Las Vegas, Nevada 89119 Las Vegas, NV 89101 8 Nevada Counsel to the Official Committee of 9 Counsel for Debtor Unsecured Creditors of Front Sight Management LLC 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

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