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

17 In re:

Case No. BK-S-22-11824-ABL
Chapter 11

18
19 FRONT SIGHT MANAGEMENT, LLC
20 Debtor.

**DECLARATION IN SUPPORT OF
OBJECTION TO STIPULATION
REGARDING DEPOSITION OF IGNATIUS
A. PIAZZA IN CONNECTION WITH THE
COMMITTEE’S OBJECTION TO PLAN
CONFIRMATION**

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23 Brian D. Shapiro, hereby states:

- 24 1. Affiant is counsel for Las Vegas Development Fund (“LVDF”). I have personal
25 knowledge of the facts and circumstances stated herein and am competent to testify to
26 the same.
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28 2. On November 2, 2022, the Committee filed an amended notice of deposition of Ignatius
Piazza. Such notice stated that “All Parties may attend and cross-examine”.

- 1 3. On November 3, 2022, correspondence was sent by the undersigned to Dawn Cica,
2 counsel for the Committee as to the status of the deposition and was advised that it was
3 moved to November 14, 2022 and that a link would be provided from the Court
4 Reporter. A true and correct copy of the email correspondence is attached to LVDF's
5 objection as **Exhibit 1**.
- 6 4. Also, Lauren Schluskel of Kelly Drye & Warren LLP responded that the court reporter
7 will include myself and Ms. Champion when the links are sent. A true and correct copy
8 of that email correspondence is attached to LVDF's objection as **Exhibit 2**.
- 9 5. On November 6, 2022, a link was provided to Affiant by Remote Depo for the
10 deposition of Mr. Piazza. A true and correct copy of that email is attached hereto as
11 **Exhibit 3**.
- 12 6. On November 9, 2022, the Committee and the Debtor entered into a Stipulation that
13 attempts to restrict LVDF and other parties to attend the deposition of Ignatius A.
14 Piazza and to make such deposition confidential.
- 15 7. After reviewing the stipulation, an email was sent to counsel of the Debtor and the
16 Committee to inquire if there was an objection to LVDF attending. The Debtor has
17 objected to LVDF attending such deposition. A true and correct copy of that email is
18 attached to LVDF's objection as **Exhibit 4**.
- 19 8. After sending such correspondence, the undersigned spoke with Dawn Cica who
20 advised that the Committee had no objection to LVDF attending but understood that
21 the Debtor did not want any other party to attend.
- 22 9. As the deposition is being taken as part of a contested proceeding in which LVDF is a
23 party, LVDF should be entitled to attend such deposition. Accordingly, LVDF requests
24 this Court to deny the Stipulation and/or alternatively permit LVDF and its counsel to
25 attend the deposition.
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1 10. I declare under penalty of perjury that the foregoing is true and correct.
2

3 DATED 11-9-2022

4 /s/ Brian D. Shapiro, Esq.
5 Brian D. Shapiro, Esq.
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