

STEVEN T. GUBNER – NV Bar No. 4624  
 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*  
 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*  
 BG LAW LLP  
 300 S. 4<sup>th</sup> Street, Suite 1550  
 Las Vegas, NV 89101  
 Telephone: (702) 835-0800  
 Facsimile: (866) 995-0215  
 Email: ssubner@bg.law  
 sseflin@bg.law  
 jwellington@bg.law

Attorneys for Chapter 11 Debtor

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

In re  
 Front Sight Management LLC,  
 Debtor.

Case No. 22-11824-abl  
 Chapter 11

**Hearing Date:** January 9, 2023  
**Hearing Time:** 9:30 a.m.

**OMNIBUS NOTICE OF HEARING ON FINAL FEE**  
**APPLICATIONS OF PROFESSIONALS**

On December 12, 2022, the following applications for approval and allowance of final fees and expenses (collectively, the “Fee Applications”) were filed in the above-captioned chapter 11 bankruptcy case of Front Sight Management LLC (the “Debtor”):

1. *Second and Final Fee Application of BG Law LLP, as Bankruptcy Counsel for the Debtor, for the Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses* [ECF No. 590];
2. *Second and Final Fee Application of Province, LLC, as Financial Advisor for the Debtor, for the Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses* [ECF No. 592];

1           3.       *First and Final Application of Lucas, Horsfall, Murphy & Pindroh, LLP, as*  
 2 *Accountant for the Debtor, for the Allowance of Compensation for Professional Services Rendered*  
 3 *[ECF No. 588];*

4           4.       *Second and Final Fee Application of Carlyon Cica Chtd., as Nevada counsel to the*  
 5 *Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional*  
 6 *Servicers Rendered and Reimbursement of Expenses;*

7           5.       *Second and Final Fee Application of Kelley Drye & Warren LLP for Compensation*  
 8 *for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Official*  
 9 *Committee of Unsecured Creditors of Front Sight Management LLC; and*

10          6.       *Second and Final Fee Application of Dundon Advisers LLC for Compensation for*  
 11 *Services Rendered and Reimbursement of Expenses Incurred as Financial Adviser to the Official*  
 12 *Committee of Unsecured Creditors of Front Sight Management LLC.*

13           The Fee Applications request approval of compensation for services rendered to the Debtor  
 14 or its estate and reimbursement of expenses incurred in connection with such services on a final  
 15 basis, as follows:

16 **BG Law LLP**

17	Role of Applicant:	Chapter 11 Counsel for the Debtor
18	Compensation Period:	September 1, 2022 – December 9, 2022
19	Final Application Period:	May 24, 2022 – December 9, 2022
20	Compensation Period Fees Requested:	\$569,489.50
21	Previous Fees Requested and Rewarded:	\$577,955.50
22	Final Application Fees Requested:	\$1,147,445.00
23	Compensation Period Costs Requested:	\$11,245.03
24	Previous Costs Requested and Rewarded:	\$13,580.22
25	Final Application Costs Requested:	\$24,825.25
26	Total Final Fees and Costs Sought:	\$1,172,270.25 <sup>1</sup>
27	Total Additional Payment Sought:	\$307,584.80 (plus any amounts per Footnote 1)

27 <sup>1</sup> BG will submit a supplement that includes time incurred from December 9, 2022 through and  
 28 including the hearing on the Application (including an estimate for time incurred in connection with  
 the hearing on the Application).

**Province, LLC**

Role of Applicant:	Financial Advisor for the Debtor
Compensation Period:	September 1, 2022 – December 2, 2022
Final Application Period:	May 24, 2022 – December 2, 2022

Compensation Period Fees Requested:	\$676,643.55
Previous Fees Requested and Rewarded:	\$581,381.50
Final Application Fees Requested:	\$1,258,025.05

Compensation Period Costs Requested:	\$1,551.51
Previous Costs Requested and Rewarded:	\$750.07
Final Application Costs Requested:	\$2,301.58

Total Final Fees and Costs Sought:	\$1,260,326.63 <sup>2</sup>
Total Additional Payment Sought:	\$315,157.67

**Lucas, Horsfall, Murphy & Pindroh, LLP**

Role of Applicant:	Accountant for the Debtor
Compensation Period:	May 24, 2022 – December 2, 2022
Final Application Period:	May 24, 2022 – December 2, 2022

Compensation Period Fees Requested:	\$49,348.50
Previous Fees Requested and Rewarded:	N/A
Final Application Fees Requested:	\$49,348.50

Compensation Period Costs Requested:	\$0.00
Previous Costs Requested and Rewarded:	N/A
Final Application Costs Requested:	\$0.00

Total Final Fees and Costs Sought:	\$49,348.50
Total Additional Payment Sought:	\$19,348.50

**Carlvon Cica CHTD.**

Role of Applicant:	Nevada Counsel to the Official Committee of Unsecured Creditors
Compensation Period:	September 1, 2022 – December 2, 2022
Final Application Period:	June 13, 2022 – December 2, 2022

Compensation Period Fees Requested:	\$71,626
Previous Fees Requested and Rewarded:	\$82,570
Final Application Period Fees Requested:	\$154,196

Compensation Period Costs Requested:	\$596.91
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<sup>2</sup> This includes \$5,000 estimated for post-effective date fees.

1 Previous Costs Requested and Rewarded: \$1,945.76  
 2 Final Application Period Costs Requested: \$2,542.67

3 Total Final Fees and Costs Sought: \$156,738.67<sup>3</sup>  
 4 Total Additional Payment Sought: \$59,554.91

5 **Kelley Drye & Warren LLP**

6 Role of Applicant: Counsel to the Official Committee of Unsecured  
 7 Creditors

8 Compensation Period: September 1, 2022 – December 2, 2022

9 Final Application Period: June 13, 2022 – December 2, 2022

10 Compensation Period Fees Requested: \$439,437.00

11 Previous Fees Requested and Rewarded: \$484,299.50

12 Final Application Period Fees Requested: \$933,736.50

13 Compensation Period Costs Requested: \$4,447.70

14 Previous Costs Requested and Rewarded: \$875.87

15 Final Application Period Costs Requested: \$5,323.57

16 Total Final Fees and Costs Sought: \$939,060.07<sup>4</sup>

17 Total Additional Payment Sought: \$453,884.70

18 **Dundon Advisors LLC**

19 Role of Applicant: Financial Advisor to the Official Committee of  
 20 Unsecured Creditors

21 Compensation Period: September 1, 2022 – December 9, 2022

22 Final Application Period: June 15, 2022 – December 9, 2022

23 Compensation Period Fees Requested: \$154,269.00

24 Previous Fees Requested and Rewarded: \$114,167.00

25 Final Application Period Fees Requested: \$268,436.00

26 Compensation Period Costs Requested: N/A

27 Previous Costs Requested and Rewarded: N/A

28 Final Application Period Costs Requested: N/A

Total Final Fees and Costs Sought: \$268,436.00

Total Additional Payment Sought: \$154,269.00

<sup>3</sup> This includes \$5,000 for estimated post-effective date fees.

<sup>4</sup> This includes \$10,000 for estimated post-effective date fees.

1           **PLEASE TAKE NOTICE** that on **January 9, 2023 at 9:30 a.m.** before the Honorable  
2 August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1 located at 300 Las Vegas  
3 Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to consider the Fee  
4 Applications, which unless otherwise indicated in a specific application, seek approval on a final  
5 basis of all fees and expenses incurred during the pendency of this chapter 11 case. Hearing  
6 information can be obtained at the following link on the Court’s website:

7 <https://www.nvb.uscourts.gov/case-info/mega-cases/front-sight-management/>.

8           **PLEASE TAKE FURTHER NOTICE THAT** copies of the Fee Applications may be  
9 obtained from the above-captioned Court, located at the Foley Federal Building, 300 Las Vegas  
10 Blvd. South, Las Vegas, Nevada 89101, through the Court’s electronic filing system  
11 (<https://ecf.nvb.uscourts.gov/>), for free via the Debtor’s noticing agent at  
12 <https://cases.stretto.com/FrontSight> or by sending a written request to counsel for the Debtor, Susan  
13 K. Seflin, via email at [sseflin@bg.law](mailto:sseflin@bg.law).

14  
15           If you object to the relief requested, you *must* file a **WRITTEN** response to the Fee  
16 Applications with the Court. You *must* also serve your written response on the person who  
17 sent you this notice.

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

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

22           **PLEASE TAKE FURTHER NOTICE** that any opposition to the Fee Applications must be  
23 filed pursuant to Local Rule 9014(d)(1).

24           **PLEASE TAKE FURTHER NOTICE THAT** that if you do not want the court to grant the  
25 relief sought in the Fee Applications, or if you want the court to consider your views on the Fee  
26 Applications, then you must file an opposition with the court, and serve a copy on the person making  
27 the Applications ***no later than 14 days*** preceding the hearing date for the Fee Applications, unless an  
28 exception applies (see Local Rule 9014(d)(3)). The opposition must state your position, set forth all

1 relevant facts and legal authority, and be supported by affidavits or declarations that conform to  
2 Local rule 9014(c).

3 DATED: December 12, 2022

BG Law LLP

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5 By: /s/ Susan K. Seflin  
6 Susan K. Seflin  
7 Attorneys for Chapter 11 Debtor  
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