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**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.

**FINAL FEE APPLICATION OF KELLEY DRYE & WARREN LLP
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
FRONT SIGHT MANAGEMENT LLC FOR THE PERIOD FROM
JUNE 13, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022**

Pursuant to section 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of Nevada (the “Local Rules”), and the *Order Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals* (the “Interim Compensation Order”),¹ Kelley Drye & Warren LLP (“Kelley Drye”), as primary counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Front Sight Management LLC, the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby submits its final fee

¹ Docket No. 318.

1 application (the “Application”) seeking entry of an order granting it final compensation and
2 reimbursement of expenses for the period from June 13, 2022 through and including
3 December 2, 2022 (the “Final Period”), which includes the second interim period of
4 September 1, 2022 through and including December 2, 2022 (the “Second Interim Period”).

5 This Application is made and based upon the following Memorandum of Points
6 and Authorities, the declarations of Robert L. LeHane and Mark Eagleton, each filed concurrently
7 herewith, the papers and pleadings on file herein, judicial notice of which is respectfully requested,
8 and any argument of counsel at the time of hearing on the Application.

9 **I. SUMMARY OF REQUESTED RELIEF AND EVIDENCE**

10 1. This Application has been prepared in accordance with the United States
11 Trustee’s *Guidelines for Reviewing Applications for Compensation and Reimbursement of*
12 *Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee
13 Guidelines”), as well as in accordance with Bankruptcy Rule 2016 and Local Rule 2016. This is
14 Kelley Drye’s final application for allowance of compensation and reimbursement of expenses in
15 the Debtor’s chapter 11 case. Kelley Drye seeks final payment of 100% of its fees and expenses
16 relating to services rendered during the Final Period.

17 2. This Application sets forth the fees and expenses Kelley Drye incurred as
18 primary counsel to the Committee during the Final Period. Kelley Drye requests final allowance
19 of compensation in the amount of \$933,736.50 and reimbursement of expenses in the amount of
20 \$5,323.57 for a total of \$939,060.07 for services rendered during the Final Period.²

21 3. **Exhibit 1** provides a summary of compensation requested by project
22 category for the Second Interim Period.

23 4. **Exhibit 2** provides a summary of compensation requested by project
24 category for the Final Period.

25 _____
26 ² This amount includes an estimated \$10,000 in fees and expenses incurred after the
27 Effective Date in connection with (i) preparing this Application; (ii) responding to any
28 objections to this Application; and (iii) attending the hearing thereon. Kelley Drye reserves
the right to seek additional fees or expenses incurred during the time period indicated above
if not included herein: (i) in preparing this Application and reviewing the final fee
applications of other professionals; (ii) responding to objections to this Application, if any;
and (iii) attending any hearings thereon.

1 5. **Exhibit 3** provides itemized time records of the attorneys and
2 paraprofessionals that have rendered services to the Committee during the Second Interim Period.

3 6. **Exhibit 4** is a summary of fees by professional. This summary sets forth
4 the total fees incurred by each timekeeper that worked on this case and sets forth each
5 professional's hourly rate and the total amount billed by the professional during the Final Period.

6 7. **Exhibit 5** discloses the customary and comparable compensation required
7 by the U.S. Trustee Guidelines.

8 8. **Exhibit 6** summarizes the actual and necessary expenses that Kelley Drye
9 incurred during the Second Interim Period.

10 9. **Exhibit 7** summarizes the actual and necessary expenses that Kelley Drye
11 incurred during the Final Period.

12 **II. JURISDICTION AND VENUE**

13 10. This Court has jurisdiction over this Application pursuant to
14 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (B).

15 11. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

16 12. Pursuant to Local Rule 9014.2, Kelley Drye consents to entry of final
17 order(s) or judgment(s) by the bankruptcy judge if it is determined that the bankruptcy judge,
18 absent consent of the parties, cannot enter final orders for judgment consistent with Article III of
19 the United States Constitution.

20 **III. BACKGROUND**

21 13. On May 24, 2022 (the "Petition Date"), the Debtor filed a voluntary petition
22 for relief under chapter 11 of the Bankruptcy Code with this Court. Since the Petition Date, the
23 Debtor has remained in possession of its assets and has continued to operate and manage its
24 business as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

25 14. On June 9, 2022, the Office of the United States Trustee for Region 17
26 appointed a five-member Committee consisting of: (i) Steven M. Huen; (ii) Gary Cecchi;
27 (iii) David Streck; (iv) Thomas E. Donaghy; and (v) ALM Investments LLC.³ The Committee

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³ Docket No. 116.

1 selected Kelley Drye as its lead counsel and Carlyon Cica Chtd. (“Carlyon Cica”) as Nevada
2 counsel. The Committee also selected Dundon Advisers, LLC (“Dundon”) as its financial advisor.

3 15. On July 1, 2022, Kelley Drye filed the *Application for Order Authorizing*
4 *the Employment and Retention of Kelley Drye & Warren LLP as Lead Counsel for the Official*
5 *Committee of Unsecured Creditors Effective as of June 13, 2022* (the “Retention Application”).⁴
6 The Court entered an order approving the Retention Application on July 29, 2022.⁵

7 16. On September 23, 2022, Kelley Drye filed its first interim fee application
8 (the “First Interim Fee Application”) for compensation for services rendered and reimbursement
9 of expenses incurred from June 13, 2022 through August 31, 2022 (the “First Interim Period”).⁶
10 On October 25, 2022, the Court entered an order granting the First Interim Fee Application.⁷

11 17. On November 29, 2022, the Court entered an order confirming the *Debtor’s*
12 *Second Amended Chapter 11 Plan of Reorganization* (as may be amended, modified or
13 supplemented, the “Plan”).⁸ On December 2, 2022 (the “Effective Date”), the Plan became
14 effective and the Committee was disbanded.

15 **IV. SERVICES RENDERED DURING THE SECOND INTERIM PERIOD**

16 18. Kelley Drye rendered the following professional legal services to the
17 Committee during the Second Interim Period:

- 18 a. Analyze the Debtor’s Plan and amended disclosure statement,
19 conduct research regarding issues with respect to same, prepare and
20 file an objection to each, and confer internally, as well as with the
21 Debtor, regarding the Committee’s issues and concerns with same;
- 22 b. Continue the investigation into and conduct research related to the
23 Debtor’s prepetition conduct and transactions involving Dr. Piazza;
- 24 c. Prepare for a deposition of Dr. Piazza in connection with the
25 Committee’s investigation;
- 26 d. Negotiate a global settlement (the “Global Settlement”) with the
27 Debtor, Dr. Piazza and PrairieFire for the benefit of general
28 unsecured creditors and incorporate the Global Settlement into the

25 ⁴ Docket No. 233.

26 ⁵ Docket No. 302.

27 ⁶ Docket No. 365.

28 ⁷ Docket No. 453.

⁸ Docket No. 405, 556.

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Plan;

- e. Prepare for, and attend, the September 1 hearing regarding the Debtor’s motion for terminating sanctions and LVDF’s motion to quash subpoenas and 2004 exams;
- f. Prepare for, and attend, the September 9 oral rulings on LVDF’s motions: (i) to appoint an examiner; (ii) to remand the adversary proceeding; and (iii) for relief from stay, as well as the Committee’s motion to intervene in the LVDF adversary proceeding;
- g. Prepare for, and attend, the September 30 disclosure statement hearing and November 18 confirmation hearing; and
- h. Conduct meetings and provide email updates to the Committee regarding the general status of the case, the Debtor’s business operations, pleadings filed, and Kelley Drye’s ongoing negotiations with the Debtor on various case matters.

19. All services rendered for which compensation is requested and all costs incurred by Kelley Drye for which reimbursement is requested in this Application were reasonable, necessary and appropriate, and were performed for or incurred on behalf of the Committee during the Final Period. The fees and expenses incurred during the Second Interim Period are set forth below:

Date Range	Requested	
	Fees	Expenses
September 1, 2022 – September 30, 2022	\$180,153.00	\$2,507.66
October 1, 2022 – October 31, 2022	\$95,097.00	\$104.25
November 1, 2022 – November 30, 2022	\$161,981.00	\$1,820.04
December 1, 2022 – December 2, 2022	\$2,206.00	\$15.75
Totals:	\$439,437.00	\$4,447.70

To assist the Court in its review of the fees incurred during the Second Interim Period, Kelley Drye has divided its time entries into the project categories set forth below.⁹

⁹ Summaries of time billed to project categories during the First Interim Period were included in the First Interim Fee Application. *See* Docket No. 364.

1 **Case Administration** (Fees: \$1,460.00 – Hours: 2.0)

2 20. This category represents time spent by Kelley Drye addressing general and
3 administrative matters attendant to the case. During the Second Interim Period, Kelley Drye
4 prepared an application for *pro hac vice* admission for William S. Gyves, the attorney responsible
5 for deposing Dr. Piazza.

6 **Pleadings Review** (Fees: \$2,420.00 – Hours: 3.4)

7 21. This category represents time spent by Kelley Drye monitoring the docket
8 and conducting initial reviews of relevant pleadings filed in this case, including the Plan related
9 documents and the Debtor's objections to claims.

10 **Retention Matters (Applications & Objections)** (Fees: \$1,079.50 – Hours: 1.3)

11 22. This category represents time spent by Kelley Drye attendant to all matters
12 regarding the retention of professionals in this case. During the Second Interim Period, Kelley
13 Drye reviewed the Debtor's application to employ Greenberg Traurig as special counsel and the
14 U.S. Trustee's objection to same.

15 **Fee Matters (Applications & Orders)** (Fees: \$25,635.50 – Hours: 34.4)

16 23. This category represents time spent by Kelley Drye preparing and serving
17 its monthly fee statement, Kelley Drye's first interim fee application for the period from June 13,
18 2022 through August 31, 2022, providing comments to Dundon's first interim fee application, and
19 beginning to prepare this Application.

20 **Asset Analysis Recovery and Disposition** (Fees: \$1,260.00 – Hours: 1.4)

21 24. This category represents time spent by Kelley Drye related to the disposition
22 and recovery of the Debtor's assets. During the Second Interim Period, Kelley Drye analyzed the
23 possibility of a sale of the Debtor's assets and conferred internally and with Dundon regarding
24 same.

25 **Claims Administration, Analysis & Objection** (Fees: \$6,922.00 – Hours: 8.8)

26 25. This category represents time spent by Kelley Drye related to the analysis
27 of claims against the Debtor's estate. During the Second Interim Period, Kelley Drye reviewed
28

1 the Debtor's six omnibus objections to claims and conducted research with respect to the treatment
2 of membership claims in bankruptcy.

3 **Disclosure Statement & Plan** (Fees: \$242,044.00 – Hours: 291.6)

4 26. This category represents time spent by Kelley Drye related to the Debtor's
5 disclosure statement and Plan. During the Second Interim Period, Kelley Drye analyzed and
6 reviewed the Debtor's first and second amended disclosure statements and Plan, the Plan related
7 documents, including three Plan supplements, financial projections and liquidation analyses, and
8 conferred internally, with the Debtor and Dundon regarding same.

9 27. The issues Kelley Drye analyzed and researched with respect to the
10 Debtor's disclosure statement and Plan included timing, solicitation, voting, claims calculation,
11 insider releases, the absolute priority rule, and other key disclosure and confirmation issues.
12 Kelley Drye also drafted and filed objections to both the amended disclosure statement and Plan,
13 reviewed Meacher's and the U.S. Trustee's objections to the Plan, reviewed the various
14 stipulations entered into between the Debtor, LVDF, PrairieFire and entered into a stipulation with
15 the Debtor regarding the Global Settlement.

16 28. The Committee's objection to the disclosure statement resulted in an
17 opportunity for 8,000 members, whose membership agreements were subject to rejection, to vote
18 on the Plan and provided for more robust disclosures to allow creditors to evaluate the Plan,
19 including disclosures related to risk factors and the unsecured creditors' claims pool. The Court
20 ultimately approved the revised disclosure statement as containing adequate information.¹⁰

21 29. Likewise, the Committee's efforts in objecting to the Plan culminated in the
22 Global Settlement. The Global Settlement resulted in: (i) Dr. Piazza agreeing to share 25% of his
23 net savings related to the disputed claims of LVDF and Meacher, up to \$500,000, and (ii) a
24 liquidating trust for the benefit of general unsecured creditors; and (iii) an oversight committee
25 consisting of three Committee members.

26 **Committee and Creditor Communications** (Fees: \$59,495.00 – Hours: 67.5)

27 30. This category represents time spent by Kelley Drye preparing for and
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¹⁰ Docket No. 403.

1 conducting regular Committee meetings as well as communicating with Committee members on
2 an individual basis from time to time regarding this case. During the Second Interim Period, Kelley
3 Drye conducted routine telephonic meetings with the Committee to discuss general case status and
4 pending case matters, including summaries of the disclosure statement and Plan, negotiations with
5 respect to same, terms of the membership options proposed by PrairieFire, the LVDF litigation,
6 the Debtor's omnibus objections to claims, and the Debtor's rejection of all membership
7 agreements. Kelley Drye also prepared regular emails updating the Committee on case
8 developments, including recently filed pleadings and recommendations regarding same.

9 **Business Operations** (Fees: \$177.00 – Hours: 0.2)

10 31. This category represents time spent by Kelley Drye analyzing the Debtor's
11 business operations. During the Second Interim Period, Kelley Drye conferred with Carlyon Cica
12 regarding the Debtor's August monthly operating report.

13 **Court Hearings** (Fees: \$20,496.00 – Hours: 22.9)

14 32. This category represents time spent by Kelley Drye preparing for and
15 attending hearings on various matters before the Court. During the Second Interim Period, Kelley
16 Drye prepared for and participated in (i) the September 1 hearing in the LVDF adversary
17 proceeding regarding the Debtor's motion for terminating sanctions and LVDF's motion to quash
18 subpoenas and 2004 exams; (ii) the September 9 oral rulings on LVDF's motions: (a) to appoint
19 an examiner, (b) to remand the adversary proceeding, and (c) for relief from stay, as well as the
20 Committee's motion to intervene in the LVDF adversary proceeding; (iii) the September 30
21 hearing on the Debtor's amended disclosure statement; (iv) October 24 hearing on the Committee's
22 professionals' first interim fee applications; and (v) the November 18 confirmation hearing.

23 **Lender Litigation** (Fees: \$177.00 – Hours: 0.2)

24 33. This category represents time spent by Kelley Drye with respect to all
25 matters attendant to the LVDF litigation. During the Second Interim Period, Kelley Drye reviewed
26 a summary of the stipulation between the Debtor and LVDF vacating the terminating sanction
27 order entered by the state court.

28 **Meetings/Communications with Debtor** (Fees: \$6,724.50 – Hours: 7.5)

1 34. This category represents time spent by Kelley Drye conferring and
2 communicating with the Debtor. During the Second Interim Period, Kelley Drye conferred with
3 the Debtor's advisors regarding case status and various pending matters, including the LVDF
4 litigation, the disclosure statement and Plan, and various information requests.

5 **Insider Investigation** (Fees: \$71,546.50 – Hours: 88.7)

6 35. This category represents time spent by Kelley Drye investigating potential
7 claims against the Debtor's insiders. During the Second Interim Period, Kelley Drye continued its
8 analysis of historic transactions for potential claims. In connection therewith, Kelley Drye
9 analyzed additional information produced by the Debtors in response to the Committee's
10 information requests, including tax returns, email correspondence and historical documents, and
11 conferred with Dundon regarding its analysis of potential claims. Kelley Drye also prepared for
12 the scheduled deposition of Dr. Piazza, which was canceled due to the Global Settlement.

13 **V. ACTUAL AND NECESSARY DISBURSEMENTS**

14 36. Kelley Drye's out of pocket disbursements during the Second Interim
15 Period total \$4,447.70. Kelley Drye's out of pocket disbursements during the Final Period total
16 \$5,323.57. These disbursements and expenses are broken down into categories of charges in
17 **Exhibit 6** and **Exhibit 7**, respectively. Kelley Drye submits that the expenses it has incurred in
18 rendering legal services to the Committee are reasonable and necessary under the circumstances,
19 and that the reimbursement to Kelley Drye for such expenses is appropriate and should be allowed.

20 **VI. VALUATION OF SERVICES**

21 37. During the Final Period, Kelley Drye's attorneys and paraprofessionals
22 expended a total of 1,140.7 hours, for which compensation is sought. **Exhibit 3** provides itemized
23 time records of the attorneys and paraprofessionals that have rendered services to the Committee
24 during the Second Interim Period. Kelley Drye included itemized time records for the First Interim
25 Period as an exhibit to the First Interim Fee Application.¹¹

26 38. The rates charged are Kelley Drye's normal hourly rates for work of this
27 character and pursuant to the Kelley Drye's agreement with the Committee. The reasonable value

28 _____
¹¹ See Docket No. 364.

1 of the services rendered by Kelley Drye to the Committee during the Final Period is \$923,736.50.

2 39. All services for which compensation is requested by Kelley Drye were
3 performed for or on behalf of the Committee, and not on behalf of the Debtor or other persons.
4 There is no agreement or understanding between Kelley Drye and any other person, other than
5 members of the firm, for the sharing of compensation to be received in this case.

6 **VII. THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

7 40. Section 330 provides that a court may award a professional employed under
8 section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services
9 rendered [and] reimbursement for actual, necessary expenses.”¹² Section 330 also sets forth the
10 criteria for the award of such compensation and reimbursement:

11 In determining the amount of reasonable compensation to be
12 awarded to [a] professional person, the court shall consider the
13 nature, the extent, and the value of such services, taking into account
all relevant factors, including –

- 14 (A) the time spent on such services;
- 15 (B) the rates charged for such services;
- 16 (C) whether the services were necessary to the administration of,
17 or beneficial at the time at which the service was rendered
toward the completion of, a case under this title;
- 18 (D) whether the services were performed within a reasonable
19 amount of time commensurate with the complexity,
importance, and nature of the problem, issue, or task
20 addressed;
- 21 (E) with respect to a professional person, whether the person is
22 board certified or otherwise has demonstrated skill and
experience in the bankruptcy field; and
- 23 (F) whether the compensation is reasonable based on the
24 customary compensation charged by comparably skilled
25 practitioners in cases other than cases under this title.¹³

26 41. “A customary review of a fee application under § 330 starts with a
determination of the ‘lodestar’ [approach], by multiplying a reasonable number of hours expended

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28 ¹² 11 U.S.C. § 330(a)(1).

¹³ 11 U.S.C. § 330(a)(3).

1 by a reasonable hourly rate.”¹⁴ In addition, a bankruptcy court examines the circumstances and
2 manner in which services are performed and results achieved to determine a reasonable fee.¹⁵ Such
3 examination includes a review of the following factors:
4

- 5 (a) Were the services authorized?
- 6 (b) Were the services necessary or beneficial to the
7 administration of the estate at the time they were rendered?
- 8 (c) Are the services adequately documented?
- 9 (d) Are the fees required reasonable, taking into consideration
10 the factors set forth in section 330(a)(3)?
- 11 (e) In making the determination, the court must consider
12 whether the professional exercised reasonable billing
13 judgment.¹⁶

14 42. In this case, Kelley Drye submits that the services for which it seeks
15 compensation and the expenditures for which it seeks reimbursement in this Application were
16 necessary for and beneficial to the Committee’s participation in this chapter 11 case. In accordance
17 with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair
18 and reasonable given (i) the complexity of this case; (ii) the time expended; (iii) the nature and
19 extent of the services rendered; (iv) the value of such services; and (v) the costs of comparable
20 services other than in a case under this title. Accordingly, approval of the compensation for
21 professional services and reimbursement of expenses sought in this Application is warranted.

22 **VIII. NOTICE**

23 43. Notice of this Application has been provided to the Reviewing Parties (as
24 defined in the Interim Compensation Order) and in accordance with the provisions of the Plan.
25 Because of the nature of the relief requested, the Committee respectfully submits that no further

26 ¹⁴ *Unsecured Creditors’ Committee v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th
27 Cir. 1991); *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983).

28 ¹⁵ *See Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswick Drug Co. (In re Mednet)*, 251
B.R. 103, 108 (B.A.P. 9th Cir. 2000).

¹⁶ *Id.*; *see also Leichty v. Neary (In re Strand)*, 375 F.3d 854, 860 (9th Cir. 2004).

1 notice of the Application is necessary or required under the circumstances.

2 **CONCLUSION**

3 **WHEREFORE**, Kelley Drye respectfully requests that the Court: (i) grant the
4 Application and authorize final allowance of compensation for necessary and valuable professional
5 services rendered to the Committee in the sum of \$933,736.50 and reimbursement of actual and
6 necessary expenses incurred in the sum of \$5,323.57 during the Final Period; and (ii) authorize
7 payment of the amounts requested in the Application; and (iii) grant such other relief as this Court
8 deems just and proper.

9
10 Dated: December 12, 2022.
Las Vegas, NV

Respectfully submitted.
CARLYON CICA, CHTD

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18 -and-

19 **KELLEY DRYE & WARREN LLP**

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Jason R. Adams, Esq. (admitted *pro hac vice*)
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27
28 *Counsel to the Official Committee of Unsecured
Creditors of Front Sight Management LLC*

Exhibit 1**COMPENSATION BY PROJECT CATEGORY
SEPTEMBER 1, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022**

MATTER NUMBER	DESCRIPTION	HOURS	AMOUNT
0001	Case Administration	2.0	\$1,460.00
0002	Pleadings Review	3.4	\$2,420.00
0003	Retention Matters (Applications & Orders)	1.3	\$1,079.50
0004	Fee Matters (Applications & Orders)	34.4	\$25,635.50
0006	Asset Analysis, Recovery and Disposition	1.4	\$1,260.00
0009	Claims Administration (Analysis & Objection)	8.8	\$6,922.00
0010	Disclosure Statement & Plan	291.6	\$242,044.00
0011	Committee & Creditor Communication	67.5	\$59,495.00
0012	Business Operations	0.2	\$177.00
0013	Court Hearings	22.9	\$20,496.00
0018	Lender Litigation	0.2	\$177.00
0019	Meetings and Communications with Debtors	7.5	\$6,724.50
0020	Insider Investigation	88.7	\$71,546.50
Totals:		529.9	\$439,437.00

Exhibit 2**COMPENSATION BY PROJECT CATEGORY
JUNE 13, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022**

MATTER NUMBER	DESCRIPTION	HOURS	AMOUNT
0001	Case Administration	38.5	\$31,503.50
0002	Pleadings Review	30.0	\$21,638.00
0003	Retention Matters (Applications & Orders)	37.3	\$28,654.50
0004	Fee Matters (Applications & Orders)	53.7	\$40,774.00
0005	Financing/Cash Collateral	64.3	\$57,390.00
0006	Asset Analysis, Recovery and Disposition	2.2	\$1,980.00
0009	Claims Administration (Analysis & Objection)	21.4	\$18,226.00
0010	Disclosure Statement & Plan	323.5	\$270,563.00
0011	Committee & Creditor Communication	152.2	\$134,260.00
0012	Business Operations	3.2	\$2,869.50
0013	Court Hearings	88.2	\$74,432.00
0016	Contested Matters	74.7	\$56,088.00
0018	Lender Litigation	111.7	\$68,455.00
0019	Meetings and Communications with Debtors	25.9	\$23,091.50
0020	Insider Investigation	113.9	\$93,811.50
Totals:		1,140.7	\$923,736.50

Exhibit 3

**ITEMIZED FEES
SEPTEMBER 1, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022**

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
LOS ANGELES
CHICAGO
HOUSTON

NEW YORK
STAMFORD
PARSIPPANY

AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859242

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$0.00
Disbursements and Other Charges:	\$2,507.66

Total Amount Due: \$2,507.66

Terms: Payment Due on or Before November 24, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
LOS ANGELES
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HOUSTON

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859242

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

Other Charges:

Westlaw Research	\$2,398.80	
Lexis Research	108.86	
Total Other Charges for this Matter:		2,507.66
Total this Invoice		\$2,507.66

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859243

029142 Front Sight Management Committee
0003 Retention Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$1,079.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,079.50

Terms: Payment Due on or Before November 24, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

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Client 029142
Matter 0003 Retention Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/16/22	Review application to retain Greenberg Traurig as special counsel (.3) and objection of the U.S. trustee to same (.2); email correspondence with S. Seflin (BG) regarding questions and concerns with same (.2).	LSS	0.70	\$619.50
09/19/22	Summarize and circulate to KDW team UST objection to Greenberg Traurig retention application.	PAW	0.40	280.00
09/19/22	Review UST objection to the debtor's request to retain GT.	JRA	0.20	180.00
Total Services for this Matter:				1,079.50
Total this Invoice				\$1,079.50

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Front Sight Management Committee

Client 029142

Matter 0003

October 25, 2022

Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.20	900.00	\$180.00
LSS	Schluskel, Lauren	0.70	885.00	619.50
PAW	Weintraub, Philip A	0.40	700.00	280.00

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October 25, 2022
Invoice No. 2859244

029142 Front Sight Management Committee
0004 Fee Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$20,205.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$20,205.50

Terms: Payment Due on or Before November 24, 2022

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Matter 0004 Fee Matters (Applications & Objections)

Attorney: 06284

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Emails with R. Vohra (KDW) regarding KDW monthly fee statement.	LSS	0.30	\$265.50
09/06/22	Review KDW prebills for August in connection with preparation of monthly fee statement.	JRA	1.10	990.00
09/07/22	Review schedule of UCC professionals' fee statements and coordinate preparation of same.	RLL	0.20	180.00
09/09/22	Review additional prebills for KDW August time in connection with preparation of fee statement.	JRA	0.20	180.00
09/12/22	Correspond with L. Schlusel (KDW) and T. O'Steen (CC) regarding UCC professionals' second monthly fee statements and 1st interim fee applications.	RV	0.20	140.00
09/12/22	Further review of KDW prebills for August time in connection with preparation of monthly fee statement.	JRA	0.30	270.00
09/14/22	Email from S. Seflin (BG) regarding monthly fee statements.	RLL	0.10	90.00
09/14/22	Continue preparing KDW second monthly fee statement (.6); review invoices and fee worksheet regarding same (.4); correspond with	RV	1.10	770.00

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Front Sight Management Committee
Client 029142
Matter 0004
October 25, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/14/22	L. Schlüssel (KDW) regarding same (.1). Review KDW invoices (.2) and begin preparing KDW August fee worksheet (.8).	MMV	1.00	335.00
09/15/22	Correspondence with S. Sefflin (BGL) regarding interim compensation order, carve-out and go-forward monthly statements.	JRA	0.20	180.00
09/15/22	Review (.2) and revise (.4) KDW monthly fee statement.	LSS	0.60	531.00
09/15/22	Telephone call (.1) and correspondence (.1) with E. Reubel (Dundon) regarding second monthly fee statement (.1); correspondence with L. Schlüssel (KDW) regarding same (.1); begin preparing KDW first interim fee application (.7).	RV	1.10	770.00
09/16/22	Continue drafting KDW first interim fee application and task specific narratives (5.6); review invoices and fee work sheet with respect to same (1.2); review local rules and procedures regarding same (.4).	RV	7.20	5040.00
09/17/22	Continue drafting KDW first interim fee application (1.1), LeHane declaration (.7); review invoices to verify amounts (.3); review UST guidelines with respect to same (.3).	RV	2.40	1680.00
09/19/22	Finalize draft of KDW interim fee application (.2); proof same, exhibits and declaration (.3); draft cover sheet (.1); correspond with L. Schlüssel (KDW) regarding same (.1); review	RV	0.80	560.00

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Front Sight Management Committee
Client 029142
Matter 0004
October 25, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/20/22	correspondence from T. O'Steen (CC) regarding Eagleton declaration (.1). Review (.1) and revise (.1) the Eagleton declaration in support of the UCC professionals' fee applications; correspond with T. O'Steen (CC) regarding same (.1); correspond with E. Reubel (Dundon) regarding drafts of Kelley Drye's first interim fee application (.1).	RV	0.40	280.00
09/21/22	Correspond with T. O'Steen (CC) regarding notice of hearing for interim fee applications (.1); review (.1) and revise (.1) same; correspond with T. O'Steen (CC) regarding CC fee application (.1); review same (.1); correspond with E. Reubel (Dundon) regarding Dundon fee application (.1); review (.2) and revise (.2) same; review (.2) and revise (.1) Reubel declaration; correspond with E. Reubel (Dundon) regarding same (.1).	RV	1.40	980.00
09/22/22	Review draft of KDW interim application from R. Vohra (KDW) (.5); provide comments to same (.4).	JRA	0.90	810.00
09/22/22	Revise draft of KDW first interim fee statement from R. Vohra (KDW) (1.3); review exhibits (.2) and LeHane declaration in support of same (.2); revise declaration (.2); conference with R. Vohra (KDW) regarding missing information	LSS	2.40	2124.00

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Client 029142
Matter 0004
October 25, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	from exhibits (.2); conference with R. Vohra (KDW) regarding Dundon interim fee application and declaration needed in support of same (.2); conference with M. Eagleton (ALM) regarding declaration in support of same (.1).			
09/22/22	Conference with L. Schlusser (KDW) regarding revising KDW fee application exhibits (.2); conference with L. Schlusser (KDW) regarding Dundon interim fee application and declaration needed in support of same (.2); review (.6) and revise (.5) the KDW interim fee application, LeHane declaration, Eagleton declaration, and accompanying exhibits; correspond with J. Adams (KDW) regarding same (.1); review comments from J. Adams (KDW) regarding same (.3); incorporate same (.6).	RV	2.50	1750.00
09/23/22	Review further revised draft of KDW interim fee application in advance of filing.	JRA	0.20	180.00
09/23/22	Review J. Adams (KDW) further comments to KDW fee application (.4); LeHane declaration (.1); cover sheet (.1); and exhibits (.1); incorporate same (.3); draft email to J. Adams (KDW) addressing open questions and providing revised drafts (.2); review (.2) and revise (.1) Dundon's fee application and exhibit; correspond with E. Reubel (Dundon)	RV	3.00	2100.00

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Front Sight Management Committee
Client 029142
Matter 0004
October 25, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding redlines of same (.1); multiple telephone calls with T. O'Steen (CC) regarding local procedures and filing of same (.2); revise Reubel declaration (.2); correspond with E. Reubel (Dundon) regarding same (.1); correspond with T. O'Steen (CC) regarding filing of same (.1); compile fee applications, invoices, and accompanying declarations and exhibits (.6); correspondence with L. Schlusel (KDW) regarding same (.1); correspond with T O'Steen (CC) regarding same (.1).			
	Total Services for this Matter:			20,205.50
	Total this Invoice			\$20,205.50

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Front Sight Management Committee
Client 029142
Matter 0004
October 25, 2022
Page 6

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.90	900.00	\$2,610.00
LSS	Schluskel, Lauren	3.30	885.00	2,920.50
MMV	Vicinanza, Marie M	1.00	335.00	335.00
RLL	LeHane, Robert L	0.30	900.00	270.00
RV	Vohra, Ravi	20.10	700.00	14,070.00

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859245

029142 Front Sight Management Committee
0006 Asset Analysis, Recovery and Disposition

Account Summary And Remittance Form

Legal Services:	\$1,260.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,260.00

Terms: Payment Due on or Before November 24, 2022

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October 25, 2022
Invoice No. 2859245

Client 029142
Matter 0006 Asset Analysis, Recovery and Disposition

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Review update report from R. LeHane (KDW) on pivot to sale (.2); analyze potential terms with respect to same (.3); conference with E. Reubel (Dundon) regarding same, implications and next steps (.4).	JRA	0.90	\$810.00
09/08/22	Conference with S. Schwartz (SL) regarding proposed sale transaction to be implemented through plan, next steps and potential meeting between proposed purchaser and committee (.3); update R. LeHane and L. Schlüssel (both KDW) regarding same (.2).	JRA	0.50	450.00
Total Services for this Matter:				1,260.00
Total this Invoice				\$1,260.00

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Front Sight Management Committee
Client 029142
Matter 0006
October 25, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.40	900.00	\$1,260.00

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175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859252

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$1,170.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,170.00

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Client 029142
 Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Follow up research regarding treatment of membership claims in bankruptcy.	JRA	1.30	\$1170.00
Total Services for this Matter:				1,170.00
Total this Invoice				\$1,170.00

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Front Sight Management Committee
Client 029142
Matter 0009
October 25, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.30	900.00	\$1,170.00

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October 25, 2022
Invoice No. 2859248

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$84,916.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$84,916.00

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October 25, 2022
Invoice No. 2859248

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Call with E. Reubel (Dundon) regarding status of plan discussions with Piazza and DIP lender (.2); update J. Adams (KDW) regarding same (.2).	RLL	0.40	\$360.00
09/01/22	Preliminary research on vote designation issues involving lender purchase of unsecured claims and factors to consider (.6); assess plan issues in connection with pivot to sale and liquidating plan, including insider release issues (.4); update from R. LeHane (KDW) on plan discussions (.2).	JRA	1.20	1080.00
09/01/22	Review email from R. LeHane (KDW) with update regarding proposed plan process and acquisition by FS DIP.	LSS	0.20	177.00
09/02/22	Call with S. Seflin (BG) regarding update on term sheet with DIP lender buyer (.5); emails with E. Reubel (Dundon), J. Adams and L. Schlusser (both KDW) regarding same (.3).	RLL	0.80	720.00
09/02/22	Analyze correspondence from R. LeHane (KDW) and E. Reubel (Dundon) on terms of updated plan/sale transaction (.3); review plan	JRA	1.00	900.00

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Front Sight Management Committee
Client 029142
Matter 0010
October 25, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/02/22	term sheet (.5); correspondence with BG law and notice parties on request to shorten notice for disclosure statement hearing in light of modified timeline for filing revised plan (.2). Conference with S. Seflin (BG) regarding updated plan terms and related issues (.4); conference with E. Reubel (DA) regarding same (.2); follow-up email to J. Adams and R. LeHane (each of KDW) regarding same (.1); review executed plan term sheet from FS DIP (.3).	LSS	1.00	885.00
09/08/22	Strategy conference with J. Adams and R. Vohra (each of KDW) regarding plan issues, potential research questions and next steps regarding same.	LSS	0.70	619.50
09/08/22	Outline anticipated plan issues for internal meeting on plan analysis preparation (.5); strategy conference with L. Schlusssel and R. Vohra (both KDW) regarding plan and disclosure statement issues for follow up on factual issues and legal research (.7).	JRA	1.20	1080.00
09/08/22	Office conference with L. Schlusssel and J. Adams (both of KDW) regarding plan and disclosure statement strategy.	RV	0.70	490.00
09/09/22	Update conference with R. LeHane (KDW) regarding plan process, analysis and follow up research (.2); high level review of filed revised	JRA	0.70	630.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	plan, disclosure statement and solicitation motion (.5).			
09/09/22	Initial review of revised disclosure statement (.4) and plan (.4); conference with J., Adams (KDW) regarding same (.2).	RLL	1.00	900.00
09/09/22	Draft outline of plan and insider issues for analysis and research (1.6); email to J. Adams and R. Vohra (both KDW) regarding same (.1).	LSS	1.70	1504.50
09/10/22	Review motion to approve disclosure statement (.8); confirmation hearing notice (.2) and proposed ballot (.1); emails with R. LeHane (KDW) regarding same, committee update and next committee call (.3).	LSS	1.40	1239.00
09/10/22	Emails with L. Schlusel (KDW) regarding plan and disclosure statement review (.2); review solicitation motion (.5).	RLL	0.70	630.00
09/12/22	Review Prairie Fire new membership plan in connection with updated plan.	LSS	1.20	1062.00
09/12/22	Conduct secondary, in-depth analysis of disclosure statement terms, focusing on impaired classes, new membership program exhibits, release provisions and voting rights (1.3); review solicitation motion to assess breadth of solicitation (.7); prepare notes on same (.2); correspondence with R. LeHane and L. Schlusel (both KDW) regarding same (.3).	JRA	2.50	2250.00
09/13/22	Draft email to S. Seflin (BG) regarding classes	LSS	1.30	1150.50

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	of membership interests and plan voting questions (.7); follow-up conference with J. Adams (KDW) regarding same (.3); review bar date motion in connection with service of same on membership classes (.3).			
09/13/22	Conference with L. Schlüssel (KDW) on plan and solicitation issues (.3); analyze correspondence from S. Seflin (BG) regarding membership interests, claims and solicitation and cross-reference solicitation materials (.5).	JRA	0.80	720.00
09/13/22	Review plan (.7) and disclosure statement (.6).	RV	1.30	910.00
09/14/22	Preliminary review of L. Schlüssel (KDW) disclosure statement issues list (.3); cross-reference plan and solicitation procedures (.3).	JRA	0.60	540.00
09/14/22	Continue to analyze draft disclosure statement (1.8); draft outline of disclosure statement and voting issues (1.7).	LSS	3.50	3097.50
09/15/22	Prepare comments to L. Schlüssel (KDW) draft disclosure statement issues list and potential objection outline.	JRA	0.60	540.00
09/15/22	Conference with L. Schlüssel (KDW) regarding legal arguments in DS objection (.3); review samples of legal arguments for adequacy of DS and solicitation (.2).	CC	0.50	257.50
09/15/22	Conference with C. Choe (KDW) regarding disclosure statement issues and legal section of	LSS	1.10	973.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	draft objection (.3); begin draft of background section of objection to disclosure statement (.8).			
09/17/22	Continue to draft background section of disclosure statement objection.	LSS	1.60	1416.00
09/18/22	Review case law regarding adequacy of disclosure statement (.8); update objection (.3).	CC	1.10	566.50
09/19/22	Follow up with S. Schwartz (SL) regarding PF plan sale and potential meeting with committee to discuss path forward (.1); conference with S. Schwartz (SL) on plan status, open issues (.6); update L. Schlusel (KDW) on discussion, disclosure statement objection status (.2).	JRA	0.90	810.00
09/19/22	Continue research on disclosure statement adequacy (1.3); continue drafting legal arguments (2.3).	CC	3.60	1854.00
09/20/22	Continue researching disclosure statement issues regarding debtor releases (2.5); continue drafting adequacy argument (1.4); conduct research on plan feasibility (1.2); draft legal argument (.4); conduct research on impairment and good faith of plan (1.0); draft legal argument (.4); conduct research on risk factors and solicitation requirements (.8); continue drafting legal arguments (.8); conference with L. Schlusel (KDW) regarding next steps (.2).	CC	8.70	4480.50
09/20/22	Call with L. Schlusel (KDW) regarding	RLL	0.30	270.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/20/22	disclosure statement objections and status of discussions with counsel to debtor regarding plan settlement. Begin outlining settlement scenarios and potential term sheet for global case settlement on plan and insider issues (1.7); follow up research on strength of insider claims in connection with same (1.8); review LVDF counterclaims to assess lookback period issues (.5); conference with L. Schlusel (KDW) on status of disclosure statement issues and follow up with S. Seflin (BG) regarding same (.3).	JRA	4.30	3870.00
09/20/22	Review draft legal sections of disclosure statement objection from C. Choe (KDW) (.6); follow up research regarding third-party releases within the ninth circuit (.6); revise draft legal section (1.1); revise draft argument section of objection regarding insider release (1.3); conferences with each of C. Choe (.2), R. LeHane (.2) and J. Adams (.3) (all KDW) regarding objection and plan issues; conference with E. Reubel (DA) regarding follow-up on Province conversation (.2); conference with S. Seflin (BG) regarding disclosure statement concerns (.4); draft disclosure statement issues list (1.4); review (.3) and revise (.4) same; email to S. Seflin (BG) regarding same (.1).	LSS	7.10	6283.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/21/22	Confer with L. Schlüssel (KDW) regarding draft objection to DS (.3); confer with J. Adams (KDW) regarding outline of plan settlement issues and draft objection to DS (.3).	RLL	0.60	540.00
09/21/22	Confer with L. Schlüssel (KDW) regarding research issue (.1); continue disclosure statement objection research on releases (.8); revise argument (.3).	CC	1.20	618.00
09/21/22	Conference with R. LeHane (KDW) regarding plan process, disclosure statement objection and global settlement parameters (.3); review outstanding DS issues list (.1) and follow up with L. Schlüssel (KDW) on status of DS objection (.1).	JRA	0.50	450.00
09/21/22	Continue to revise insider release portion of disclosure statement objection (1.4); begin to draft remaining portions of disclosure statement objection, including retention of new value by insider (.9), claims impairment (1.1) unsecured creditor distributions (1.3) and member voting (1.3); revise same (1.1); revise background section (.6); conferences with C. Choe (.1), R. LeHane (.3) and J. Adams (.1) (all KDW) regarding draft objection; begin draft of preliminary statement (1.6).	LSS	9.80	8673.00
09/22/22	Review of draft disclosure statement objection (.4); confer with R. LeHane (KDW) regarding	JRA	0.60	540.00

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09/22/22	revisions to same (.2). Confer with L. Schlusel (KDW) regarding additional research for objection (.2); conduct additional research (.4).	CC	0.60	309.00
09/22/22	Review and revised disclosure statement objection (2.3); confer with J. Adams (KDW) (.2) and L. Schlusel (KDW) (2x) (.6) regarding same.	RLL	3.10	2790.00
09/22/22	Review (.6) and further revise (1.3) draft objection to disclosure statement; conference with C. Choe (KDW) on additional research (.2); conference with R. LeHane (KDW) regarding comments to objection (.3); further revise draft disclosure statement to incorporate comments from R. LeHane (KDW) (2.2); review revised preliminary statement from R. LeHane (KDW) (.2) and incorporate comments (.2); further follow-up conference with R. LeHane (KDW) regarding same (.3).	LSS	5.30	4690.50
09/23/22	Review revised DS objection and J. Adams (KDW) comments regarding same.	RLL	0.60	540.00
09/23/22	Review further updated draft of disclosure statement objection from L. Schlusel (KDW) (.6); prepare comments to same (.5); revise discrete paragraphs of same (.3).	JRA	1.40	1260.00
09/23/22	Review (.3) and revise (.4) draft disclosure statement objection; review comments to draft	LSS	4.00	3540.00

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09/24/22	disclosure statement objection from J. Adams (KDW) (.3); revise draft objection to incorporate same (.7); further revise same to incorporate comments from C. Carlyon (CC) (.2); review (.5) and finalize (.9) same; review disclosure statement objections from the U.S. trustee (.2), LVDF (.3) and Meacher (.2). Correspondence with R. LeHane and L. Schlusel (both KDW) and Dundon team on debtor response to UCC objection to DS and follow up on global settlement (.3); brief review of UST (.2) and LVDF (.3) objections.	JRA	0.80	720.00
09/26/22	Participate in conference with R. LeHane and L. Schlusel (both KDW), P. Huygens (Province), S. Sefflin (BG) and G. Garman (GTG) regarding UCC DS objection, solicitation issues and global settlement parameters (.6); follow up with R. LeHane (KDW) regarding same (.3); continue outlining settlement considerations (.3).	JRA	1.20	1080.00
09/26/22	Call regarding DS and plan settlement issues with debtor FA, P. Huygens (Province), debtor counsel, S. Sefflin (BG) and Piazza counsel, G. Garman (GL) and J. Adams and L. Schlusel (both KDW) (.6); follow up strategy conference with J. Adams (KDW) regarding next steps (.3).	RLL	0.90	810.00

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09/26/22	Participate, together with R. LeHane and J. Adams (each of KDW) in conference with P. Huygens (Province), S. Seflin (BG) and G. Garman (GTG) regarding disclosure statement concerns and global settlement prospect.	LSS	0.60	531.00
09/27/22	Continue formulating global settlement structure (.7); conference with L. Schlusel (KDW) and Dundon team on same (1.0).	JRA	1.70	1530.00
09/27/22	Strategy conference with J. Adams (KDW), E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding potential global settlement parameters.	LSS	1.00	885.00
09/28/22	Review reply to committee and other disclosure statement objections from debtor (.7) and Prairie Fire (.6); review updated analysis from E. Reubel (DA) regarding insider distributions (.3); strategy conference with E. Reubel, T. Rizvi, M. Garber and Y. Zhu (each of DA) regarding same (1.0); follow-up strategy conference with R. LeHane and J. Adams (each of KDW) regarding same and parameters for global settlement (.3); draft follow-up email to R. LeHane (KDW) with data points on potential global settlement (.5).	LSS	3.40	3009.00
09/28/22	Review Dundon updated settlement analysis (.4); conference with E. Reubel (Dundon) regarding settlement parameter analysis (.6);	JRA	2.00	1800.00

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09/28/22	conference with R. LeHane and L. Schlusel (both KDW) on same (.3); brief review of replies to DS objections from debtor (.4) and purchaser (.3). Review updated claims analysis from Dundon advisors related to plan and settlement (.4); strategy conference with L. Schlusel and J. Adams (both KDW) regarding revised plan counter (.3).	RLL	0.70	630.00
09/29/22	Conference with R. LeHane and L. Schlusel (both KDW) regarding disclosure statement issues, potential global settlement parameters (.5); update from R. LeHane (KDW) on conference with G. Garman (GL) (.2); conference with S. Schwartz (SL) regarding settlement parameters (.2); correspondence with S. Sefflin (BG) and L. Schlusel (KDW) on disclosure statement revisions (.2); conference with S. Schwartz (SL) regarding settlement parameters (.2); follow up with R. LeHane (KDW) on same (.2).	JRA	1.50	1350.00
09/29/22	Strategy conference with J. Adams and L. Schlusel (both KDW) regarding plan and DS settlement discussions (.5); review debtor reply (.3) and objections of LVDF (.3) and US Trustee (.2) to disclosure statement; prepare for (.4) and calls with G. Garman (GL) counsel to	RLL	3.40	3060.00

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	Piazza (.5), S. Gubner (BG) counsel to debtor (.4), P. Huygens (Province) FA to debtor (.5), and B. Shapiro, counsel to LVDF (.3), regarding disclosure statement and plan settlement discussions.			
09/29/22	Strategy conference with R. LeHane and J. Adams (KDW) regarding global settlement terms (.5); conference with S. Seflin (BG) regarding global settlement, disclosure statement comments and upcoming hearing (.4); follow-up email to S. Seflin (BG) regarding same (.2); follow-up conference with S. Seflin (BG) regarding same (.2).	LSS	1.30	1150.50
09/30/22	Review and comment on draft order approving disclosure statement (.5); emails with counsel to debtor, S. Seflin (BG) regarding same (.2); confer with J. Adams (KDW) regarding current status of settlement discussions (.2).	RLL	0.90	810.00
09/30/22	Review updated settlement proposal from G. Garman (GL) (.2); conference with R. LeHane (KDW) regarding current settlement proposal, UCC recommendation and process forward for today's DS hearing (.2).	JRA	0.40	360.00
09/30/22	Review initial proposed order approving disclosure statement (.3) and incorporate comments to same (.4); conference with S. Seflin (BG) regarding solicitation of non-active	LSS	1.10	973.50

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	members (.4).			
	Total Services for this Matter:			84,916.00
	Total this Invoice			\$84,916.00

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CC	Choe, Connie	15.70	515.00	\$8,085.50
JRA	Adams, Jason	23.90	900.00	21,510.00
LSS	Schlussel, Lauren	47.30	885.00	41,860.50
RLL	LeHane, Robert L	13.40	900.00	12,060.00
RV	Vohra, Ravi	2.00	700.00	1,400.00

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175 Greenwich Street
New York, NY 10007

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029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$34,122.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$34,122.00

Terms: Payment Due on or Before November 24, 2022

Please Return This Page With Your Payment

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BANK: JP MORGAN CHASE, N.A.
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ATTN: TREASURER'S DEPARTMENT
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Attorney: 06284

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09/01/22	Confer with committee members D. Streck (.2) and S. Heun (.2) regarding case status; emails to UCC regarding update on hearing (.5).	RLL	0.90	\$810.00
09/01/22	Review correspondence from multiple committee members regarding offers from DIP lender to purchase claims (.2); correspondence with R. LeHane (KDW) regarding implications of same (.3).	JRA	0.50	450.00
09/02/22	Email correspondence with R. LeHane and L. Schlüssel (both KDW) on UCC update and next call in light of shift to sale transaction (.3); review UCC update (.1); further correspondence from UCC members regarding offers from FS DIP to acquire claims (.2).	JRA	0.60	540.00
09/02/22	Draft email to committee with update on plan term sheet (.8); follow-up emails with R. LeHane and J. Adams (each of KDW) regarding upcoming committee call and information needed in connection with same (.3); follow-up email to D. Streck regarding committee call (.1).	LSS	1.20	1062.00

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09/02/22	Call and emails with committee members D. Streck (.3) and S. Heun (.2) regarding status and timing of claims reconciliation process.	RLL	0.30	270.00
09/06/22	Emails with committee members regarding approved DS and next steps.	RLL	0.20	180.00
09/06/22	Instructions to L. Schlusel (KDW) on preparation of talking points for tomorrow's UCC call.	JRA	0.30	270.00
09/06/22	Begin draft of talking points for September 7 committee call.	LSS	0.90	796.50
09/07/22	Review (.3) and provide comments (1.4) to L. Schlusel (KDW) draft of talking points for today's UCC call; prepare for (.6) and conduct, with R. LeHane and L. Schlusel (both KDW), today's UCC update call (1.2).	JRA	3.50	3150.00
09/07/22	Continue to draft talking points for committee call (.8); review revisions to same from J. Adams (KDW) (.2); further review same preparatory to committee call (.4); participate, together with R. LeHane and J. Adams (each of KDW) in committee call (1.2).	LSS	2.60	2301.00
09/07/22	Call with UCC regarding response to term sheet, sale of equity to FS Prairie Fire, and impact on plan.	RLL	1.20	1080.00
09/09/22	Review R. LeHane (KDW) draft update email to UCC on results of hearing (.2) and revise same (.4).	JRA	0.60	540.00

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09/10/22	Revise email to committee regarding outcome of LVDF litigation motions and next steps.	RLL	1.10	990.00
09/13/22	Prepare plan summary presentation for committee.	RV	1.60	1120.00
09/13/22	Draft email to committee with update on membership terms and scheduling committee call.	LSS	0.40	354.00
09/13/22	Instructions to L. Schlusel (KDW) regarding UCC update email, setting up UCC call.	JRA	0.30	270.00
09/14/22	Emails with S. Heun regarding availability for call (.1); follow-up email with E. Reubel (DA) regarding same (.1); further follow-up to committee members regarding rescheduling committee call (.2); correspondence with R. LeHane (KDW) regarding same (.2); review draft summary of plan and membership terms from R. Vohra (KDW) (.3); begin revisions to plan summary (.9) and membership summary (.4) sections.	LSS	2.20	1947.00
09/15/22	Review Dundon materials for tomorrow's UCC call (.3); review L. Schlusel (KDW) plan summary for tomorrow's UCC call (.2); conference with R. LeHane, L. Schlusel and R. Vohra (all KDW) in preparation for tomorrow's UCC call (1.1).	JRA	1.60	1440.00
09/15/22	Continue to revise membership summary portion of presentation from R. Vohra (KDW)	LSS	4.80	4248.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	for committee call (.9); strategy conference with R. LeHane, J. Adams and R. Vohra (each of KDW) regarding upcoming committee call and preparation for same (1.1); update draft presentation to include summary of disclosure statement issues (.8); draft talking points for committee call (1.2); review draft presentation from Dundon with insider analysis (.3); begin revisions to same (.2); conference with E. Reubel (Dundon) regarding comments to same (.3).			
09/15/22	Review talking point to prepare for UCC call (.4); call with D. Carlyon (CL) regarding same (.2); participate in UCC prep call with J. Adams, L. Schlüssel and R. Vohra (all KDW) (1.1).	RLL	1.70	1530.00
09/15/22	Conference with J. Adams, L. Schlüssel and R. LeHane (all of KDW) regarding talking points regarding plan, disclosure statement, and insider investigations for September 16 committee call.	RV	1.10	770.00
09/16/22	Review draft talking points for today's UCC call from L. Schlüssel (.5); prepare comments to same (.8); review presentations for call in connection with preparation (.4); conference L. Schlüssel (KDW) in preparation for same (.4); conduct UCC call (1.7); follow up conference	JRA	4.10	3690.00

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Front Sight Management Committee
Client 029142
Matter 0011
October 25, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/16/22	with L. Schlusser (KDW) and local counsel regarding next steps (.3). Review revised Dundon presentation from E. Reubel (DA) (.2); review talking points preparatory to committee call (.4); conference with J. Adams (KDW) to prepare for call (.4); participate, together with J. Adams (KDW), in committee call (1.7); follow-up conference with J. Adams (KDW) and C. Carlyon regarding comments to disclosure statement and questions on same (.3).	LSS	3.00	2655.00
09/23/22	Correspondence with UCC members regarding draft of disclosure statement objection and interim fee applications prior to filing (.2); correspondence with R. LeHane and L. Schlusser (both KDW) regarding same (.2); revise draft response to UCC on plan and wind down (.2).	JRA	0.60	540.00
09/23/22	Review email from M. Eagleton (ALM) regarding case issues (.2); draft email in response to same (.6); email to J. Adams and R. LeHane (each of KDW) regarding same (.1); draft email to committee with filed disclosure statement objections (.3).	LSS	1.20	1062.00
09/28/22	Calls with committee members M. Eagleton (.2); S. Heun (.3), D. Streck (.3) and T. Donaghy (.1) regarding status of settlement	RLL	0.90	810.00

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Front Sight Management Committee
Client 029142
Matter 0011
October 25, 2022
Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/29/22	discussions with counsel to Front Sight and Piazza. Draft email to committee with update on replies to omnibus objections and settlement parameters.	LSS	0.90	796.50
09/29/22	Emails with Committee members regarding settlement discussion with Piazza, Debtor and FS PF.	RLL	0.50	450.00
Total Services for this Matter:				34,122.00
Total this Invoice				\$34,122.00

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Front Sight Management Committee
 Client 029142
 Matter 0011
 October 25, 2022
 Page 7

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	12.10	900.00	\$10,890.00
LSS	Schluskel, Lauren	17.20	885.00	15,222.00
RLL	LeHane, Robert L	6.80	900.00	6,120.00
RV	Vohra, Ravi	2.70	700.00	1,890.00

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ABA #:021-000-021
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ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859247

029142 Front Sight Management Committee
0012 Business Operations

Account Summary And Remittance Form

Legal Services:	\$177.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$177.00

Terms: Payment Due on or Before November 24, 2022

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Client 029142
 Matter 0012 Business Operations

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/12/22	Review email from S. Seflin (BG) regarding information responsive to questions on monthly operating report.	LSS	0.20	\$177.00
Total Services for this Matter:				177.00
Total this Invoice				\$177.00

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Client 029142
Matter 0012
October 25, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlussel, Lauren	0.20	885.00	\$177.00

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New York, NY 10007

October 25, 2022
Invoice No. 2859246

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$14,940.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$14,940.00

Terms: Payment Due on or Before November 24, 2022

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October 25, 2022
Invoice No. 2859246

Client 029142
Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/01/22	Review adversary proceeding motions to reconsider to find terminating sanctions order void as violation of stay (.3), LVDF motion to quash 2004 exam (.3), supporting declarations (.3) and oppositions (.3); attend hearing on terminating sanctions motions (2.8).	RLL	4.00	\$3600.00
09/09/22	Review summary of motions to prepare for today's hearing (.3); attend hearing/oral ruling on LVDF motions to remand, lift stay and appoint examiner (2.0); confer with J. Adams (KDW) regarding same (.2).	RLL	2.50	2250.00
09/09/22	Participate in portion of today's hearing regarding oral rulings on remand, stay relief, UCC intervention and motion to appoint examiner (1.5); follow up conference with R. LeHane (KDW) regarding outcome, next steps and UCC follow up (.2).	JRA	1.70	1530.00
09/14/22	Correspond with L. Schlusel (KDW) regarding hearing on motion to void terminating sanctions (.1); circulate calendar invite regarding same (.1).	RV	0.20	140.00

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Front Sight Management Committee
Client 029142
Matter 0013
October 25, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/15/22	Prepare for and participate in continued hearing on approval of plan solicitation procedures.	RLL	0.70	630.00
09/29/22	Correspond with E. Reubel (Dundon) regarding disclosure statement hearing.	RV	0.10	70.00
09/29/22	Review revised DS inserts and review and revise talking points outline in preparation for DS hearing.	RLL	0.70	630.00
09/29/22	Draft outline of committee issues and proposed resolutions for R. LeHane (KDW) preparatory to hearing on disclosure statement.	LSS	1.10	973.50
09/30/22	Review motions, objections and replies to prepare for today's hearing (1.5); attend hearing to approve disclosure statement and solicitation process (3.1).	RLL	4.60	4140.00
09/30/22	Update from R. LeHane (KDW) regarding results of today's hearing.	JRA	0.20	180.00
09/30/22	Email to R. LeHane (KDW) regarding Greenberg Traurig retention preparatory to upcoming hearing (.3); emails with R. LeHane (KDW) regarding status of disclosure statement review for report to court at hearing (.2); review notes from R. LeHane (KDW) regarding disclosure statement hearings (.2); update from R. LeHane (KDW) regarding same and next steps (.2).	LSS	0.90	796.50
Total Services for this Matter:				14,940.00
Total this Invoice				\$14,940.00

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Front Sight Management Committee
 Client 029142
 Matter 0013
 October 25, 2022
 Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.90	900.00	\$1,710.00
LSS	Schluskel, Lauren	2.00	885.00	1,770.00
RLL	LeHane, Robert L	12.50	900.00	11,250.00
RV	Vohra, Ravi	0.30	700.00	210.00

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October 25, 2022
Invoice No. 2859241

029142 Front Sight Management Committee
0018 Lender Litigation

Account Summary And Remittance Form

Legal Services:	\$177.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$177.00

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October 25, 2022
Invoice No. 2859241

Client 029142
Matter 0018 Lender Litigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/14/22	Review summary from C. Carlyon (CC) of stipulation vacating terminating sanctions order.	LSS	0.20	\$177.00
Total Services for this Matter:				177.00
Total this Invoice				\$177.00

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Front Sight Management Committee
Client 029142
Matter 0018
October 25, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlusssel, Lauren	0.20	885.00	\$177.00

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ACCOUNT #:135-046110
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October 25, 2022
Invoice No. 2859251

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$1,255.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,255.50

Terms: Payment Due on or Before November 24, 2022

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ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

October 25, 2022
Invoice No. 2859251

Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/12/22	Correspondence with L. Schluskel (KDW) and S. Seflin (BGL) regarding status of UCC investigation.	JRA	0.20	\$180.00
09/12/22	Emails with S. Seflin (BG) and L. Schluskel (KDW) regarding diligence on insider historic transfers and distributions.	RLL	0.50	450.00
09/13/22	Conference with S. Seflin (BG) regarding proposal for LVDF to void terminating sanctions order.	LSS	0.30	265.50
09/20/22	Call with S. Gubner (BG), counsel to Front Sight, regarding disclosure statement and plan settlement discussions.	RLL	0.40	360.00
Total Services for this Matter:				1,255.50
Total this Invoice				\$1,255.50

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Front Sight Management Committee
 Client 029142
 Matter 0019
 October 25, 2022
 Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.20	900.00	\$180.00
LSS	Schlüssel, Lauren	0.30	885.00	265.50
RLL	LeHane, Robert L	0.90	900.00	810.00

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October 25, 2022
Invoice No. 2859250

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$20,850.50
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$20,850.50

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October 25, 2022
Invoice No. 2859250

Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/02/22	Further analyze insider transactions in preparation for Tuesday's call with Dundon (.6); correspondence with R. LeHane (KDW) regarding same and preparation for UCC presentation on same (.3).	JRA	0.90	\$810.00
09/06/22	Prepare notes on company tax returns and expert report in connection with insider distributions and loans in preparation for call with Dundon team on investigation (1.2); participate in call with L. Schlusser (KDW) and M. Dundon, E. Reubel and Dundon team (all Dundon) regarding follow up on investigation (.8); outline follow up research needed for insider analysis (.3).	JRA	2.30	2070.00
09/06/22	Review Porter expert report (.8) and historical tax returns (.6) preparatory to call with Dundon to discuss same; participate, together with J. Adams (KDW), M. Dundon, E. Reubel, T. Rizvi and Y. Zhu (each of DA) regarding insider payments and follow-up analysis (.8).	LSS	2.20	1947.00
09/07/22	Brief research regarding Nevada fraudulent	LSS	0.70	619.50

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Matter 0020
October 25, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/08/22	conveyance statute of limitation and expansion of same. Conduct research regarding potential causes of action against insiders (.9); review statutes and case law regarding same (.7).	RV	1.60	1120.00
09/08/22	Conference with E. Reubel (DA) regarding status of insider payment analysis and next steps.	LSS	0.20	177.00
09/08/22	Assemble prior legal memorandum on potential insider claims for use in analysis of potential insider claims.	JRA	0.60	540.00
09/09/22	Email correspondence from E. Reubel (Dundon) regarding status of diligence on insider claims.	JRA	0.20	180.00
09/12/22	Analyze email summary of updated schedule of insider distributions from E. Reubel (DA).	LSS	0.70	619.50
09/13/22	Review updated analysis of insider transfers and shareholder distributions and Dundon analysis of same (.7); participate in portion of call with E. Reubel and M. Garbe (both Dundon) and J. Adams and L. Schlusel (both KDW) regarding same and potential insider claims (.8).	RLL	1.50	1350.00
09/13/22	Review email from E. Reubel (DA) with additional information regarding insider distributions (.3); strategy conference with R. LeHane, J. Adams (each of KDW), E. Reubel	LSS	1.50	1327.50

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Front Sight Management Committee
Client 029142
Matter 0020
October 25, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/13/22	and M. Garbe (each of DA) regarding additional insider distribution analysis and next steps to address same (1.2). Prepare for (.5) and participate on call (1.2) with R. LeHane and L. Schlusel (both KDW) and Dundon team regarding insider transactions; review follow up issues on same (.4).	JRA	2.10	1890.00
09/14/22	Initial review of R. Vohra (KDW) summary on insider claim analysis and legal requirements for claims.	JRA	0.40	360.00
09/14/22	Conduct research on potential causes of action for insider claims (2.8); prepare outline regarding same (.5); correspond with L. Schlusel and J. Adams (both of KDW) regarding same (.1).	RV	3.40	2380.00
09/15/22	Prepare comments to R. Vohra (KDW) insider claim analysis.	JRA	0.30	270.00
09/20/22	Conduct research regarding look-back periods under various clawback statutes (1.7); draft summary regarding same (.8); correspondence with L. Schlusel (KDW) regarding same (.1).	RV	2.60	1820.00
09/20/22	Call with J. Adams (KDW) regarding LVDF counterclaims in connection with insider lookback period (.1); review state court docket and exhibits to bankruptcy court filings regarding original LVDF counterclaim and	PAW	1.20	840.00

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Front Sight Management Committee
Client 029142
Matter 0020
October 25, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
09/21/22	amended counterclaim (.9); prepare and revise summaries of same (.2). Continue conducting research regarding look-back periods and use of same under various clawback statutes in various jurisdictions (1.9); continue drafting summary of same (.8).	RV	2.70	1890.00
09/22/22	Review R. Vohra (KDW) follow up research regarding avoidance of insider transactions and look back period (.3); follow up with R. Vohra (KDW) on same (.1).	JRA	0.40	360.00
09/22/22	Finalize summary of clawback look-back periods research (.3); correspond with J. Adams and L. Schlüssel (both of KDW) regarding same (.1).	RV	0.40	280.00
Total Services for this Matter:				20,850.50
Total this Invoice				\$20,850.50

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Front Sight Management Committee
Client 029142
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Page 5

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	7.20	900.00	\$6,480.00
LSS	Schluskel, Lauren	5.30	885.00	4,690.50
PAW	Weintraub, Philip A	1.20	700.00	840.00
RLL	LeHane, Robert L	1.50	900.00	1,350.00
RV	Vohra, Ravi	10.70	700.00	7,490.00

PAYMENT BY CHECK:

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(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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INVOICE NUMBER AS PAYMENT REFERENCE

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c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

November 9, 2022
Invoice No. 2861312

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$270.00
Disbursements and Other Charges:	\$104.25

Total Amount Due: \$374.25

Terms: Payment Due on or Before December 9, 2022

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November 9, 2022
Invoice No. 2861312

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/03/22	Review critical dates and email correspondence from all parties regarding case status.	RLL	0.30	\$270.00

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Front Sight Management Committee
Client 029142
Matter 0001
November 9, 2022
Page 2

Total Services for this Matter: 270.00

Other Charges:

Lexis Research \$104.25

Total Other Charges for this Matter: 104.25

Total this Invoice \$374.25

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Front Sight Management Committee
Client 029142
Matter 0001
November 9, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLL	LeHane, Robert L	0.30	900.00	\$270.00

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November 9, 2022
Invoice No. 2861313

029142 Front Sight Management Committee
0002 Pleadings Review

Account Summary And Remittance Form

Legal Services:	\$1,470.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,470.00

Terms: Payment Due on or Before December 9, 2022

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November 9, 2022
Invoice No. 2861313

Client 029142
Matter 0002 Pleadings Review

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/25/22	Review chapter 11 plan supplement (.2) and summarize same (.4); review debtor's motion for confirmation of the chapter 11 plan (.3); and summarize same (.2); review Piazza objection to LVDF Claim and debtor's objection to same (.4); summarize same (.3); review third omnibus objection to claims (.1) and summarize same (.2).	PAW	2.10	\$1470.00
Total Services for this Matter:				1,470.00
Total this Invoice				\$1,470.00

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Front Sight Management Committee
Client 029142
Matter 0002
November 9, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PAW	Weintraub, Philip A	2.10	700.00	\$1,470.00

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November 9, 2022
Invoice No. 2861314

029142 Front Sight Management Committee
0004 Fee Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$2,967.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,967.00

Terms: Payment Due on or Before December 9, 2022

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ACCOUNT #:135-046110

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175 Greenwich Street
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November 9, 2022
Invoice No. 2861314

Client 029142
Matter 0004 Fee Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/11/22	Review KDW invoices for September in connection with reporting and preparation of monthly fee statement.	JRA	1.60	\$1440.00
10/15/22	Initial review of BG Law (.1) and Province interim fee statements (.1).	RLL	0.20	180.00
10/24/22	Review draft proposed order approving interim fee statement from D. Cica (CC).	LSS	0.20	177.00
10/24/22	Further review of KDW prebills for September in connection with reporting and preparation of monthly fee statement.	JRA	1.30	1170.00
Total Services for this Matter:				2,967.00
Total this Invoice				\$2,967.00

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Front Sight Management Committee
Client 029142
Matter 0004
November 9, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	2.90	900.00	\$2,610.00
LSS	Schluskel, Lauren	0.20	885.00	177.00
RLL	LeHane, Robert L	0.20	900.00	180.00

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November 9, 2022
Invoice No. 2861320

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$3,378.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$3,378.00

Terms: Payment Due on or Before December 9, 2022

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ACCOUNT #:135-046110
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Invoice No. 2861320

Client 029142
Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/07/22	Review debtor's first omnibus objection to certain member claims (.3); instructions to P. Weintraub (KDW) on same (.1).	JRA	0.40	\$360.00
10/07/22	Review and summarize first omnibus objection to member claims (.5); review proofs of claim subject to same (.4); review and summarize notice of rejection of membership and proposed form of notice (.7); emails with J. Adams and R. LeHane (both KDW) regarding same (.2)	PAW	1.80	1260.00
10/19/22	Review debtor's second omnibus objection to member claims and supporting declaration (.3); prepare summary of same for committee (.3).	PAW	0.60	420.00
10/19/22	Review P. Weintraub (KDW) summary of second omnibus objection to claims (.2); follow up correspondence with R. LeHane and L. Schlusel (both KDW) regarding same, UCC update (.2).	JRA	0.40	360.00
10/19/22	Review debtor's second omnibus objection to certain claims and impact on D. Streck claim (.3); review schedules for D. Streck claim (.1); email to D. Streck regarding same (.2).	LSS	0.60	531.00

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Front Sight Management Committee
 Client 029142
 Matter 0009
 November 9, 2022
 Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/20/22	Follow up correspondence with R. LeHane and L. Schlusel (both KDW) regarding debtor's second omnibus objection, LVDF motion to estimate claim for plan purposes, and UCC update on general claim status.	JRA	0.30	270.00
10/23/22	Review email from D. Streck with information regarding claim and family member claims in response to debtor objection to claim.	LSS	0.20	177.00
Total Services for this Matter:				3,378.00
Total this Invoice				\$3,378.00

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Front Sight Management Committee
Client 029142
Matter 0009
November 9, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.10	900.00	\$990.00
LSS	Schluskel, Lauren	0.80	885.00	708.00
PAW	Weintraub, Philip A	2.40	700.00	1,680.00

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175 Greenwich Street
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November 9, 2022
Invoice No. 2861316

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$66,851.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$66,851.00

Terms: Payment Due on or Before December 9, 2022

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November 9, 2022
Invoice No. 2861316

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/01/22	Review revised order approving disclosure statements and comments to same from L. Schlusel (KDW), US Trustee, debtor, LVDF and PrairieFire (.9); emails with L. Schlusel (KDW) regarding same (.3).	RLL	1.20	\$1080.00
10/01/22	Review revised proposed order approving disclosure statement (.7) and email from S. Seflin (BG) regarding same (.2); revise draft proposed order (.6); email correspondence with R. LeHane (KDW) regarding issues with same (.3).	LSS	1.80	1593.00
10/02/22	Review revised disclosure statement (.7); revise same (.6); conference with S. Seflin (BG) regarding same and solicitation (.4); follow-up conference with S. Seflin (BG) and P. Huygens (Province) regarding same (.2); follow-up correspondence with R. LeHane (KDW) regarding same (.3); review comments to disclosure statement from the U.S. Trustee (.2), Meacher (.1), FS DIP (.2) and LVDF (.2).	LSS	2.90	2566.50
10/02/22	Review multiple revised drafts of disclosure	RLL	1.50	1350.00

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Client 029142
Matter 0010
November 9, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/03/22	statements and comments to same from US Trustee, Debtor, LVDF and FS DIP (1.2); follow up emails with L. Schlusser (KDW) regarding same (.3). Review filed redline of plan and DS (.7); multiple emails with S. Schwartz (Schwartz Law), G. Garman (GTG), S. Seflin (BG Law) and E. MacDonald (OUST) regarding same and timing of filing of plan supplement (.6); review and sign off on post-hearing revised procedures order (.3).	RLL	1.60	1440.00
10/03/22	Correspondence with R. LeHane and L. Schlusser (both KDW) regarding open disclosure statement and solicitation issues (.3); update from R. LeHane (KDW) on resolution of same, next steps in connection with confirmation (.3).	JRA	0.60	540.00
10/03/22	Extensive correspondence with R. LeHane (KDW) regarding remaining comments to disclosure statement (.6); email to S. Seflin and S. Gubner (BG) regarding timing concern (.3); follow-up email to E. McDonald (UST) regarding same (.3); email to R. LeHane (KDW) with outline regarding timing concern (.5); review revised confirmation hearing notice from S. Seflin (BG) (.3).	LSS	2.00	1770.00
10/04/22	Conference with L. Schlusser (KDW) on next	JRA	0.20	180.00

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November 9, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/04/22	steps with respect to global settlement negotiations, preparation for confirmation objection. Strategy conference with J. Adams (KDW) regarding proposed global settlement (.2); draft email to counsel for the debtor, PrairieFire and Piazza with proposed settlement offer (.8).	LSS	1.00	885.00
10/11/22	Strategy conference with R. LeHane and L. Schlusser (both KDW) regarding settlement status and potential limited discovery requests in connection with confirmation objection,	JRA	0.30	270.00
10/11/22	Strategy conference with J. Adams and L. Schlusser (both KDW) regarding settlement discussions and preparation for contested confirmation hearing.	RLL	0.30	270.00
10/11/22	Strategy conference with R. LeHane and J. Adams (each of KDW) regarding global settlement and information requests needed (.3); review claims file regarding historical spend and member claims (.6); strategy conference with E. Reubel (DA) regarding same and other diligence needed (.4); begin draft information requests for confirmation objection (.7).	LSS	2.00	1770.00
10/12/22	Follow up correspondence with M. Garbe (Dundon) on factual information required for confirmation objection related to historic	JRA	0.80	720.00

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Front Sight Management Committee
Client 029142
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November 9, 2022
Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/12/22	distributions and potential need for further diligence (.3); review update from E. Reubel (Dundon) on same (.5). Review email from M. Garbe (DA) with analysis of insider transaction documents for plan information requests (.4); follow-up conference with E. Reubel (DA) regarding same and additional information needed (.2); review follow-up analysis from E. Reubel (DA) regarding same (.3) and follow-up correspondence with E. Reubel (DA) regarding same (.2); begin revisions to draft information request letter in light of additional diligence requested by Dundon Advisors (.4).	LSS	1.50	1327.50
10/13/22	Review and comment on discovery letter to counsel to debtor and Piazza (.4); review emails from M. Garbe and E. Reubel (both Dundon) regarding same (.3).	RLL	0.70	630.00
10/13/22	Correspondence with R. LeHane and L. Schlussel (both KDW) on plan discovery requests (.3); correspondence with M. Garbe (Dundon) regarding same (.2).	JRA	0.50	450.00
10/13/22	Emails with R. LeHane (KDW) regarding status of information request letter (.2); follow-up email to E. Reubel (DA) regarding same (.2); review email from M. Garbe (DA) with account information requests (.2); strategy	LSS	1.80	1593.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/14/22	conference with E. Reubel and M. Garbe (each of DA) regarding additional requests (.4); revise draft information request letter to incorporate additional requests on account valuations from balance sheet (.8).	JRA	1.10	990.00
10/14/22	Correspondence with L. Schlusssel and R. LeHane (both KDW) and Y. Zhu (Dundon) regarding additional plan discovery requests (.2); review same (.3); confer with L. Schlusssel (KDW) on revisions (.2); review further revised draft (.2) and provide additional comments (.2).	RLL	0.70	630.00
10/14/22	Review revised discovery letter (.3); emails with J. Adams and L. Schlusssel (both KDW) (.2); confer with L. Schlusssel (KDW) regarding same (.2).	LSS	2.20	1947.00
10/14/22	Review email from R. LeHane (KDW) with questions and comments on draft information request letter (.2); revise draft information request letter to incorporate comments from R. LeHane (KDW) (.6); follow-up conference with J. Adams (KDW) regarding additional comments to same (.2); emails with E. Reubel (DA) regarding comments and additions to information request letter (.3); revise same (.5); confer with R. LeHane (KDW) regarding same (.2); draft email to S. Gubner and S. Seflin			

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/18/22	(each of BG) with information request letter (.2). Review S. Seflin (BGL) response to follow up on discovery requests (.2); review L. Schlusssel (KDW) draft response (.2) and follow up correspondence with R. LeHane and L. Schlusssel (both KDW) regarding same (.2).	JRA	0.60	540.00
10/18/22	Conference with R. Vohra (KDW) regarding draft objection to plan confirmation (.3); draft follow-up email to S. Seflin and S. Gubner (each of BG) regarding same (.2); review follow-up email from S. Seflin (BG) regarding questions on information requests (.2); draft email in response to same (.4); conference with R. LeHane (KDW) regarding same (.2); follow-up emails with J. Adams and R. LeHane (each of KDW) with comments regarding same (.3).	LSS	1.60	1416.00
10/18/22	Strategy conference with L. Schlusssel regarding follow up on information requests (.2); and emails from S. Seflin (BG) (.1) and T. Platowicz (GG) (.1) regarding outstanding information requests.	RLL	0.40	360.00
10/18/22	Conference with L. Schlusssel (KDW) regarding objection to confirmation and strategy regarding same.	RV	0.30	210.00
10/19/22	Review preliminary discovery production	JRA	0.60	540.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/19/22	related to debtor historic tax returns. Conduct research on valuation disputes (.4); review plan (.2) and disclosure statement (.2); review objection to disclosure statement (.3).	RV	1.10	770.00
10/19/22	Conference with T. Polatowicz (GTG) regarding Piazza personal tax returns for committee analysis.	LSS	0.20	177.00
10/20/22	Review preliminary discovery responses to UCC request on plan issues, including property rights, gift cards and property interests.	JRA	0.60	540.00
10/21/22	Correspondence with R. Vohra (KDW) regarding plan objection preparation and arguments.	JRA	0.30	270.00
10/21/22	Strategy conference with E. Reubel (DA) regarding information received from debtor responsive to committee information requests and next steps regarding same (.3); begin review of information from debtor responsive to information requests (1.1).	LSS	1.40	1239.00
10/22/22	Review draft motion in support of confirmation (.7) and Piazza declaration in support of same (.3).	LSS	1.00	885.00
10/22/22	Review debtor brief in support of confirmation (.5); review declaration in support of same (.2); review plan supplement (.2); correspondence with internal team on call to discuss review and impact on objection (.2).	JRA	1.10	990.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/24/22	Prepare notes for today's team call regarding debtors' plan filings on Friday and impact on objection (.7); conference with R. LeHane, L. Schlusser and R. Vohra (all KDW) regarding same (.5).	JRA	1.20	1080.00
10/24/22	Strategy conference with R. LeHane, J. Adams and R. Vohra (each of KDW) regarding recent debtor pleadings and committee objection (.5); review email from M. Garbe (DA) regarding water rights (.2); follow-up email to M. Garbe (DA) with questions regarding same (.1); follow-up email to S. Sefflin (BG) with follow-up regarding water rights (.2).	LSS	1.00	885.00
10/24/22	Strategy conference with J. Adams, R. Vohra and L. Schlusser (all KDW) regarding status of discovery and response to motion in support of plan.	RLL	0.50	450.00
10/24/22	Telephone call with J. Adams, R. LeHane and L. Schlusser (all of KDW) regarding the Debtor's plan issues (.5); review confirmation brief and amended plan (.3).	RV	0.80	560.00
10/25/22	Review LVDF treatment under amended plan (.1); conduct research regarding impairment of claims (2.1); correspond with J. Adams, R. LeHane and L. Schlusser (all of KDW) regarding same (.1); review precedent for confirmation objections (.2).	RV	2.50	1750.00

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Page 9

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/25/22	Draft follow-up email to S. Seflin (BG) regarding water rights inquiries (.3); review information from S. Seflin (BG) regarding platinum memberships (1.0).	LSS	1.30	1150.50
10/25/22	Review email and attachments from P. Huygens (Province) with response to information request regarding water rights, pumps and drilling logs.	RLL	0.50	450.00
10/26/22	Review R. Vohra (KDW) legal analysis on impairment cases (.2); follow up correspondence with L. Schlusssel and R. Vohra (both KDW) regarding same (.2); review information from D. Streck (UCC member) regarding correspondence on real property interests from debtor (.2); review correspondence from L. Schlusssel (KDW) regarding 2005 member fraud class action and resolution (.1); review underlying complaint and settlement documents for incorporation into plan objection (.7).	JRA	1.40	1260.00
10/26/22	Review draft declaration from Dundon in support of plan confirmation (.4); begin revisions to same (.3); review email from R. Vohra (KDW) regarding basis for impaired treatment (.2); review confirmation requirements in connection with same (.2); follow-up emails with R. Vohra and J. Adams	LSS	3.90	3451.50

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10/26/22	(each of KDW) regarding same (.3); review information provided by D. Streck regarding platinum memberships in connection with committee plan diligence (1.6); review 2005 class action against debtor and Piazza (.7); email to R. LeHane, J. Adams (each of KDW) and E. Reubel (DA) regarding same (.2). Review correspondence from (.1) and correspond with L. Schlusssel and J. Adams (both of KDW) regarding impairment issue (.1); telephone call with E. McDonald (UST) regarding plan issues (.1); correspond with J. Adams, R. LeHane and L. Schlusssel (all of KDW) regarding same (.1).	RV	0.40	280.00
10/27/22	Review plan (.3);, disclosure statement (.2), notes from internal calls (.2), and prepare an outline of the objection to confirmation (.7); correspond (.1) and telephone call (.2) with L. Schlusssel (KDW) regarding same; begin drafting background section of objection to confirmation (2.4); correspond with R. Bolger (KDW) regarding research assignment (.2).	RV	4.30	3010.00
10/27/22	Review draft outline of plan objection from R. Vohra (KDW) (.1); call with R. Vohra (KDW) regarding same (.2).	LSS	0.30	265.50
10/28/22	Review research assignment from R. Vohra (KDW) into absolute priority rule in 9th Circuit	RTB	3.80	1805.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	(.1); review case docket and filings including KDW objection to disclosure statement as to proposed reorganization plan (.3); research caselaw on absolute priority rule in 9th Circuit as to valuations resulting in windfalls to senior classes of creditors (1.7); draft email summarizing findings (.8); identify 9th circuit precedent as to plan confirmation standards and avoidance actions as property of the estate for unsecured creditors (.9).			
10/28/22	Draft email to M. Bordwin regarding real estate appraisals (.3); conference with E. McDonald (UST) regarding plan issues (.5); emails with E. Reubel (DA) regarding property mineral rights (.2).	LSS	1.00	885.00
10/28/22	Continue drafting background section (1.1) of confirmation objection; begin drafting insufficient value objection (1.7); conduct research regarding same (.4); review research from R. Bolger (KDW) regarding Ninth Circuit case law (.1).	RV	3.30	2310.00
10/29/22	Conference with R. LeHane and L. Schlusel (both KDW) regarding plan objection, discovery and Piazza deposition preparation.	JRA	0.40	360.00
10/29/22	Strategy conference with L. Schlusel and J. Adams (.4) and with R. Vohra (.2) (all KDW) regarding plan objection and discovery.	RLL	0.40	360.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/29/22	Strategy conference with R. LeHane and J. Adams (each of KDW) regarding upcoming confirmation objection and related discovery.	LSS	0.40	354.00
10/29/22	Continue drafting insufficient value portion (1.4) of confirmation objection; begin drafting absolute priority rule portion (.9) of same; conduct research regarding same (.6); begin drafting debtor-release portion of same (.4); review research related to same (.2); continue drafting background and facts section of same (2.0); conference with R. LeHane (KDW) regarding objection status (.2); conduct research on impairment on feasibility (.7).	RV	6.40	4480.00
10/30/22	Review draft confirmation objection from R. Vohra (KDW).	LSS	0.60	531.00
10/30/22	Conduct research on third-party releases (.7); continue drafting insufficient value (.8); absolute priority rule (.4); feasibility (.3); debtor-release (.6); impairment (.3); and artificial impairment (.3) portions of objection; draft preliminary statement (.7); proofread document (.4); correspond with L. Schluskel (KDW) regarding same (.1).	RV	4.60	3220.00
10/31/22	Draft email to S. Seflin (BG) with questions regarding mineral rights on debtor's property (.3); revise draft objection to confirmation from R. Vohra (KDW) to incorporate information	LSS	5.70	5044.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding committee investigation and cause of action theories (2.6); revise background section on plan treatment (1.1); begin revisions to argument section to insufficient value argument (.9); strategy conference with J. Adams (KDW) regarding factual section of confirmation objection (.3); review email from R. Vohra (KDW) regarding claims impairment and research regarding same (.3); follow-up emails regarding same (.2).			
10/31/22	Correspondence with W. Gyves, R. LeHane and L. Schlusel (all KDW) regarding deposition notice and logistics (.2); conference with L. Schlusel (KDW) regarding plan objection and fact development (.3).	JRA	0.50	450.00
10/31/22	Conduct research on absolute priority rule as it relates to debtor releases (2.8); correspond with L. Schlusel (KDW) regarding findings (.2); conduct supplemental research regarding same (.3); correspond with library regarding same (.2); correspond with L. Schlusel (KDW) regarding cram down requirements (.1).	RV	3.60	2520.00
Total Services for this Matter:				66,851.00
Total this Invoice				\$66,851.00

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JRA	Adams, Jason	10.20	900.00	\$9,180.00
LSS	Schlüssel, Lauren	33.60	885.00	29,736.00
RLL	LeHane, Robert L	7.80	900.00	7,020.00
RTB	Bolger, Ryan T	3.80	475.00	1,805.00
RV	Vohra, Ravi	27.30	700.00	19,110.00

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November 9, 2022
Invoice No. 2861317

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$12,084.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$12,084.00

Terms: Payment Due on or Before December 9, 2022

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Matter 0011 Committee and Creditor Communications

Attorney: 06284

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/04/22	Draft email to committee with update on global settlement.	LSS	0.80	\$708.00
10/07/22	Review (.2) draft email update to UCC from P. Weintraub (KDW) on notice of termination of memberships, claim deadline and omnibus claim objections; revise same (.4).	JRA	0.60	540.00
10/19/22	Review summary of claim objections (.2); email with D. Streck regarding same (.2); email with L. Schlüssel (KDW) regarding committee meeting and updates (.2).	RLL	0.60	540.00
10/20/22	Instructions to P. Weintraub (KDW) on UCC update email (.1); review draft UCC update email from P. Weintraub (KDW) (.1); revise same (.2).	JRA	0.40	360.00
10/20/22	Conference with D. Streck regard debtor objection to claim and proposed resolution of same (.3); revise draft email to committee to include next committee call (.2).	LSS	0.50	442.50
10/20/22	Draft committee update email regarding second omnibus objection to member claims and motion to estimate LVDF claim.	PAW	0.60	420.00

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10/25/22	Review draft email from P. Weintraub (KDW) to committee with recent pleadings (.3); revise same (.3); follow-up email to M. Eagleton regarding same (.3).	LSS	0.90	796.50
10/26/22	Conference with D. Streck regarding case status, potential claims against Piazza and information gathering.	LSS	0.40	354.00
10/27/22	Review draft talking points and call with L. Schlüssel (KDW) regarding same.	RLL	0.50	450.00
10/27/22	Draft talking points preparatory to October 28 committee call.	LSS	2.20	1947.00
10/28/22	Conference with R. LeHane (KDW) preparatory to committee call (.2); review talking points preparatory to same (.7); participate, together with R. LeHane (KDW), in committee call (1.5); follow-up conference with E. Reubel and M. Garbe (each of DA) regarding next steps (.3); draft follow-up email to committee with next steps (.4); email to D. Streck regarding withdrawal of debtor objection to claim (.2).	LSS	3.30	2920.50
10/28/22	Conference with L. Schlüssel (KDW) in preparation for today's UCC call (.2); prepare for (.2) and call (1.5) with committee, L. Schlüssel (KDW) and Dundon team regarding case status, plan objections and next steps; emails with committee member D. Streck	RLL	2.10	1890.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/31/22	regarding status of objections to claims (.2). Conference with L. Schlusel (KDW) regarding M. Eagleton email (.1); telephone call and emails with committee member M. Eagleton regarding preparation for committee call and status of voting on plan (.4).	RLL	0.50	450.00
10/31/22	Review email from M. Eagleton (.1) and proposed response from R. LeHane (KDW) to same (.1); conference with R. LeHane (KDW) regarding same (.1).	LSS	0.30	265.50
Total Services for this Matter:				12,084.00
Total this Invoice				\$12,084.00

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<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.00	900.00	\$900.00
LSS	Schluskel, Lauren	8.40	885.00	7,434.00
PAW	Weintraub, Philip A	0.60	700.00	420.00
RLL	LeHane, Robert L	3.70	900.00	3,330.00

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November 9, 2022
Invoice No. 2861315

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$1,416.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,416.00

Terms: Payment Due on or Before December 9, 2022

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ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

November 9, 2022
Invoice No. 2861315

Client 029142
Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/24/22	Preliminary conference with D. Cica (CC) regarding case status preparatory to interim fee hearing (.1); review Kelley Drye interim fee application (.3) and Dundon Advisors interim fee application (.1) preparatory to hearing on same; participate in first interim fee hearing (1.0); update J. Adams (KDW) regarding same (.1).	LSS	1.60	\$1416.00
Total Services for this Matter:				1,416.00
Total this Invoice				\$1,416.00

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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Front Sight Management Committee
Client 029142
Matter 0013
November 9, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlüssel, Lauren	1.60	885.00	\$1,416.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

November 9, 2022
Invoice No. 2861319

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$1,239.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,239.00

Terms: Payment Due on or Before December 9, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.

ABA #: 021-000-021

SWIFT CODE: CHASUS33

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ACCOUNT #:135-046110

**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
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November 9, 2022
Invoice No. 2861319

Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/21/22	Strategy conference with S. Seflin (BG) regarding Streck claim objection, plan status, plan supplement and related issues.	LSS	0.70	\$619.50
10/26/22	Conference with S. Seflin regarding information responsive to committee request, plan status and LVDF.	LSS	0.70	619.50
Total Services for this Matter:				1,239.00
Total this Invoice				\$1,239.00

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Front Sight Management Committee
Client 029142
Matter 0019
November 9, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlusssel, Lauren	1.40	885.00	\$1,239.00

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

November 9, 2022
Invoice No. 2861318

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$5,422.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$5,422.00

Terms: Payment Due on or Before December 9, 2022

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ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
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MUMBAI, INDIA

Front Sight Management Committee
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175 Greenwich Street
New York, NY 10007

November 9, 2022
Invoice No. 2861318

Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/12/22	Review updated analysis of insider distributions from Dundon Advisors (.3) and email from E. Reubel (Dundon) regarding same (.2); emails with L. Schlusel and J. Adams (both KDW) regarding same (.2).	RLL	0.70	\$630.00
10/27/22	Review historical emails from Piazza to D. Streck.	LSS	0.70	619.50
10/29/22	Instructions to W. Gyves (KDW) regarding discovery and deposition of Piazza and preparation for same (.4); outline topics for discovery (.3).	RLL	0.70	630.00
10/29/22	Review case background and information in connection with upcoming deposition (.6); email to W. Gyves (KDW) regarding same (.1).	LSS	0.70	619.50
10/30/22	Emails with W. Gyves (KDW) regarding deposition preparation (.3); emails with L. Schlusel (KDW) regarding preparation of deposition notice (.3).	RLL	0.60	540.00
10/30/22	Correspondence with R. LeHane (KDW) regarding deposition of I. Piazza (.2); preliminary review of background materials	WSG	1.60	1336.00

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Front Sight Management Committee
Client 029142
Matter 0020
November 9, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
10/31/22	(1.4). Email to D. Cica (CC) regarding deposition notice and related information requests (.2); follow-up emails with W. Gyves and R. LeHane (each of KDW) regarding same (.2); review draft deposition notice (.1); conference with D. Cica (CC) regarding same (.2) and further follow-up with R. LeHane (KDW) regarding same (.2).	LSS	0.90	796.50
10/31/22	Correspondence (multiple) with KDW team regarding litigation strategy and logistics.	WSG	0.30	250.50
Total Services for this Matter:				5,422.00
Total this Invoice				\$5,422.00

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Front Sight Management Committee
 Client 029142
 Matter 0020
 November 9, 2022
 Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlussel, Lauren	2.30	885.00	\$2,035.50
RLL	LeHane, Robert L	2.00	900.00	1,800.00
WSG	Gyves, William	1.90	835.00	1,586.50

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JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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KELLEY DRYE & WARREN LLP
**** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY ****

RUN DATE: November 17, 2022 08:30:14

DATE THRU: October 31, 2022

Page: 2

Billing Timekeeper: 06284 - LeHane, Robert L
Prebill #: 1828413
029142 - Front Sight Management Committee
0001 - Case Administration

Responsible Timekeeper: 06284 - LeHane, Robert L
FORMAT 021

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
07979	Vohra , R.	10/25/22	Lexis Research	66.34	H T W	8800700
07979	Vohra , R.	10/27/22	Lexis Research	37.91	H T W	8800701
Totals:				\$104.25		

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RUN DATE: November 17, 2022 08:30:14

DATE THRU: October 31, 2022

Page: 4

Billing Timekeeper: 06284 - LeHane, Robert L
Prebill #: 1828413
029142 - Front Sight Management Committee
0001 - Case Administration

Responsible Timekeeper: 06284 - LeHane, Robert L
FORMAT 021

Other Charges Summary		Amount	Disp
000256	Lexis Research	104.25	H T W
	Total	104.25	

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862875

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$1,190.00
Disbursements and Other Charges:	\$1,820.04

Total Amount Due: \$3,010.04

Terms: Payment Due On or Before December 31, 2022

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862875

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/07/22	Prepare pro hac vice application for W. Gyves (KDW) (.3); correspond with L. Schlusssel and W. Gyves (both of KDW) regarding same (.2); order NY good standing for W. Gyves (KDW) (.1).	RV	0.60	\$420.00
11/08/22	Correspond with E. Cataquet and W. Gyves (both of KDW) regarding W. Gyves pro hac vice application (.3); review court admissions (.1); revise pro hac vice application to include court admissions (.2); correspond with M. Eagleton (Committee chair) regarding designation of local counsel signature (.1); correspond with L. Schlusssel (KDW) regarding same (.1); correspond with D. Cica and T. O'Steen (CC) regarding local rules and procedures with respect to same (.1).	RV	0.90	630.00
11/09/22	Correspond with T. O'Steen (CC) regarding W. Gyves pro hac vice application (.1); correspond with W. Gyves (KDW) regarding same (.1).	RV	0.20	140.00

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Front Sight Management Committee
Client 029142
Matter 0001
December 8, 2022
Page 2

Total Services for this Matter: 1,190.00

Other Charges:

Duplication	\$70.40
Courier	66.78
Certified Copies	267.00
Miscellaneous Expense	395.00
Cab Service	449.34
Westlaw Research	324.71
Lexis Research	246.81

Total Other Charges for this Matter: 1,820.04

Total this Invoice \$3,010.04

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AFFILIATE OFFICE:
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Front Sight Management Committee
Client 029142
Matter 0001
December 8, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RV	Vohra, Ravi	1.70	700.00	\$1,190.00

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ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862876

029142 Front Sight Management Committee
0002 Pleadings Review

Account Summary And Remittance Form

Legal Services:	\$950.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$950.00

Terms: Payment Due On or Before December 31, 2022

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December 8, 2022
Invoice No. 2862876

Client 029142
Matter 0002 Pleadings Review

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/11/22	Summarize debtor's reply in support of confirmation (.6); review motion to strike (.2); correspond with L. Schlusel (KDW) regarding same (.3).	RV	1.10	\$770.00
11/23/22	Review order to show cause for emergency hearing on entry of plan confirmation order.	RLL	0.20	180.00
Total Services for this Matter:				950.00
Total this Invoice				\$950.00

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Front Sight Management Committee
Client 029142
Matter 0002
December 8, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLL	LeHane, Robert L	0.20	900.00	\$180.00
RV	Vohra, Ravi	1.10	700.00	770.00

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175 Greenwich Street
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December 8, 2022
Invoice No. 2862877

029142 Front Sight Management Committee
0004 Fee Matters (Applications & Objections)

Account Summary And Remittance Form

Legal Services:	\$2,463.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,463.00

Terms: Payment Due On or Before December 31, 2022

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December 8, 2022
Invoice No. 2862877

Client 029142
Matter 0004 Fee Matters (Applications & Objections)

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/09/22	Review KDW October invoices in connection with preparation of fee statements.	JRA	1.20	\$1080.00
11/17/22	Review KDW September and October invoices (.3); prepare fee worksheet for both September and October (.9).	MMV	1.20	402.00
11/17/22	Review fees incurred by month from accounting (.3); email to R. LeHane (KDW) with same (.3).	LSS	0.60	531.00
11/28/22	Review summary of total fees (.2); emails with L. Schlusel (KDW) (.1) and T. James (Province) (.2) regarding same.	RLL	0.50	450.00
Total Services for this Matter:				2,463.00
Total this Invoice				\$2,463.00

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Front Sight Management Committee
 Client 029142
 Matter 0004
 December 8, 2022
 Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	1.20	900.00	\$1,080.00
LSS	Schluskel, Lauren	0.60	885.00	531.00
MMV	Vicinanza, Marie M	1.20	335.00	402.00
RLL	LeHane, Robert L	0.50	900.00	450.00

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ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862883

029142 Front Sight Management Committee
0009 Claims Administration, Analysis & Objections

Account Summary And Remittance Form

Legal Services:	\$2,374.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$2,374.00

Terms: Payment Due On or Before December 31, 2022

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ACCOUNT #:135-046110
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MUMBAI, INDIA

Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862883

Client 029142
Matter 0009 Claims Administration, Analysis & Objections

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/01/22	Review all omnibus objections to member claims to determine total amount of claims objected to and total proposed revised amount of remaining claims (1.3); email with L. Schlusel (KDW) regarding same (.1).	PAW	1.40	\$980.00
11/03/22	Email to R. LeHane (KDW) with information regarding rejection of membership agreements and timeline for filing claims for circulation to members.	LSS	0.40	354.00
11/12/22	Review Piazza declarations in support of 1st, 2nd, 3rd and 4th Omni claim objections.	RLL	0.30	270.00
11/30/22	Review and summarize fourth, fifth, sixth and seventh omnibus member claim objections and standalone objections filed by debtor.	PAW	1.10	770.00
Total Services for this Matter:				2,374.00
Total this Invoice				\$2,374.00

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Front Sight Management Committee
Client 029142
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December 8, 2022
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<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlüssel, Lauren	0.40	885.00	\$354.00
PAW	Weintraub, Philip A	2.50	700.00	1,750.00
RLL	LeHane, Robert L	0.30	900.00	270.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862940

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$88,956.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$88,956.00

Terms: Payment Due On or Before December 31, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.

ABA #: 021-000-021

SWIFT CODE: CHASUS33

ACCOUNT NAME: KELLEY DRYE & WARREN LLP

ACCOUNT #:135-046110

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175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862940

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/01/22	Initial conference with L. Schlüssel (KDW) regarding comments to confirmation objection (.3); conduct research regarding absolute priority (1.2); revise objection on insufficient value (.8), absolute priority rule (.9), and class impairment (.4); working conference with L. Schlüssel (KDW) regarding open issues with plan objection, including absolute priority rule, claims impairment and releases (.8); review revised confirmation objection (.3); further revise same (.2).	RV	4.90	\$3430.00
11/01/22	Preliminary conference with R. Vohra (KDW) regarding comments to plan objection (.3); continue to revise background section (.9) and argument section on insufficient value for unsecured creditors (1.1); revise draft objection from R. Vohra (KDW) on absolute priority rule (1.3), feasibility (.9) and artificial impairment (.8); review liquidation analysis in connection with insufficient value argument (.5); follow-up working conference with R. Vohra (KDW)	LSS	9.90	8761.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding claims impairment, releases and absolute priority rule (.8); review revised sections from R. Vohra (KDW) regarding absolute priority rule (.2) and I.R.S. lookback period (.2); review research regarding absolute priority rule (.8); revise draft preliminary statement to plan objection from R. Vohra (KDW) (.8); review (.2) and further revise same (.6); review email from P. Weintraub (KDW) regarding aggregate impact of pending claim objections for inclusion in objection (.2); review email from E. Reubel (DA) regarding analysis of debtor mineral rights (.3).			
11/02/22	Review draft objection to plan (.8); revise preliminary statement and fair value arguments (.7); conference with L. Schlusssel and R. Vohra (both KDW) regarding objection revisions (.4); confer with J. Adams (KDW) regarding same (.2).	RLL	2.10	1890.00
11/02/22	Review current draft of plan objection from L. Schlusssel (KDW) (.6); prepare notes to same (1.3); confer with R. LeHane (KDW) on revisions (.2); review email discovery produced by debtor in connection with member communications (1.1).	JRA	3.20	2880.00
11/02/22	Telephone call with R. LeHane and L. Schlusssel (both of KDW) to discuss	RV	3.40	2380.00

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	confirmation objection (.4); follow-up calls with L. Schlusel (KDW) regarding same, debtor releases, and open issues (.6); revise background section of same (.3); telephone call with D. Cica (CC) regarding debtor release (.2); conduct research regarding same (1.6); review correspondence from L. Schlusel, J. Adams and R. LeHane (all of KDW) regarding revised confirmation objection and comments to same (.2); review comments to same from C. Carylon (CC) (.1).			
11/02/22	Strategy conference with R. LeHane and R. Vohra (KDW) regarding comments to draft confirmation objection (.4); review draft background section based on comments from R. LeHane (KDW) (.4) and further revise same (.8); revise draft preliminary statement (.9); follow-up conferences with R. Vohra (KDW) regarding releases, impairment and open confirmation issues (.6); review additional comments from R. LeHane (KDW) (.2); further revise draft objection to incorporate same (.6); review revised declaration from E. Reubel (DA) in support of confirmation objection (.6); review comments to plan objection from C. Carlyon (CC) (.4).	LSS	4.50	3982.50
11/03/22	Download list of claims from claims register	RTB	1.00	475.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/03/22	and sort by value in excel (.4) in connection with voting issues; review largest POCs and compile sampling from claims register (.6). Revise updated draft of committee plan objection, including revisions to fact section (1.9) and argument sections (1.2); cross reference disclosure statement, first day declaration, liquidation analysis, class complaint and insider analysis in connection with same (1.0); review member/Piazza correspondence with respect to same (.7); conference with R. LeHane, L. Schlusel and R. Vohra (all KDW) regarding draft and further revisions (.4); revise preliminary statement (.8).	JRA	6.00	5400.00
11/03/22	Emails with counsel to Debtor, S. Sefflin (BG) regarding Piazza deposition, status of voting, and plan negotiations (.2); strategy conference with Adams, L. Schlusel and R. Vohra (all KDW) regarding objection (.4); review and revise plan objection (1.3); email G. Garman (GL) regarding potential settlement of plan objections (.3).	RLL	2.20	1980.00
11/03/22	Revise draft of Reubel declaration (.6); conference with E. Reubel (DA) regarding same (.3); conference with E. McDonald (UST) regarding proposed confirmation arguments (.3); research regarding debtor releases within	LSS	7.50	6637.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	the 9th circuit (.8); review revised draft objection from J. Adams (KDW) (.6); strategy conference with R. LeHane, J. Adams and R. Vohra (KDW) regarding same and next steps (.4); revise draft objection to clean-up fact section (.9); multiple conferences (3x) with R. Vohra (KDW) regarding comments to draft objection (.5); revise draft objection to incorporate updated section on debtor release (1.1); email correspondence with D. Cica (CC) regarding proposed filing of certain documents under seal (.2); follow-up conference regarding same (.2); emails with S. Sefflin (BG) regarding inclusion of debtor schedule in connection with same (.2); review revised preliminary statement from J. Adams (KDW) (.3); revise same (.5); emails with D. Cica (CC) regarding comments to plan objection (.2); review stipulation between the debtor and LVDF regarding plan treatment and claim objection (.2); follow-up conference with R. Vohra (KDW) regarding LVDF stipulation, Piazza deposition and confidentiality issues (.2).			
11/03/22	Office conference with J. Adams, R. LeHane and L. Schluskel (all of KDW) regarding confirmation objection and open issues regarding arguments (.4); multiple office	RV	3.90	2730.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/04/22	<p>conferences with L. Schlusel (KDW) regarding comments to confirmation objection, incorporation of same, and open issues (.5); incorporate comments from J. Adams, R. LeHane, L. Schlusel (all of KDW) and local counsel into same (1.4); review debtor-release argument from L. Schlusel (KDW) (.2); revise same (.2); further revise confirmation objection to add exhibits, comments to preliminary statements, and revised release section (.6); correspond with L. Schlusel regarding same (.2); correspond with D. Cica (CC) regarding email exhibit (.1); review local rules with respect to same (.1); office conference with L. Schlusel (KDW) to discuss LVDF/Debtor stipulation and open issues (.2).</p> <p>Review and revise preliminary statement in plan objection (1.1) confer with L. Schlusel (KDW) regarding same, coordinating filing exhibits to Dundon declaration under seal and objection deadline (.2); emails with S. Seflin (BG) regarding status of voting and plan negotiations (.2); emails and conferences with J. Adams and L. Schlusel (both KDW) regarding same (.6); review and edit revised plan objection (.9); emails and calls with T. Polotowicz (GL) counsel to Piazza, regarding</p>	RLL	4.10	3690.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/04/22	plan objection settlement (.4); email and call with E. Macdonald (OUST) regarding plan status (.3); review US Trustee objection to plan (.4). Review updated draft of Reubel declaration in support of confirmation objection (.3); begin revising same (.3); conference with L. Schlusel (KDW) regarding questions on same (.2); further revise same (.5); follow up correspondence with R. LeHane (KDW) regarding status of objection and follow up with Piazza's counsel on objection, potential settlement (.2); correspondence with counsel for debtor and Piazza on extended objection deadline (.2).	JRA	1.70	1530.00
11/04/22	Review draft stipulation from D. Cica (CC) regarding sealing of exhibits (.2); revise same (.2); conference with J. Adams (KDW) regarding comments to Dundon declaration in support of objection (.2); review comments from J. Adams (KDW) to same (.3); conference with E. Reubel (DA) regarding same (.3); review revised declaration from M. Garbe (DA) in support of objection (.4); review draft exhibits in support of same (.2); follow-up emails with R. Vohra (KDW) regarding same (.1); review revised draft of objection from R.	LSS	5.50	4867.50

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	LeHane (KDW) (.4); confer with R. LeHane (KDW) regarding same (.2); further revise same (.6); review additional comments to same from R. Vohra (KDW) (.2); review revised declaration from E. Reubel (DA) (.2); further revise same (.4); review email from M. Garbe (DA) regarding analysis of taxes paid on distribution (.3); follow-up conference with E. Reubel (DA) regarding same (.3); further revise draft declaration (.3); conference with R. LeHane (KDW) regarding extension of committee objection deadline (.2); follow-up email to T. Pilatowicz (GL) regarding agreement to extend committee objection deadline (.1); review draft stipulation from D. Cica (CC) adjourning committee objection deadline (.2); follow-up emails with D. Cica (CC) regarding same (.2).			
11/04/22	Compile exhibits for confirmation objection (.2); review DIP hearing transcript regarding same (.2); review (.8) and finalize (.3) confirmation objection; correspond with D. Cica (CC) regarding redaction of email exhibit to confirmation objection (.1); correspond with L. Schlusser (KDW) regarding insufficient value argument and objection deadline (.1).	RV	1.70	1190.00
11/07/22	Conference with E. Reubel (DA) regarding	LSS	1.80	1593.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/07/22	declaration in support of confirmation objection (.2); review revised declaration from E. Reubel (DA) (.1) and further revise same (.1); follow-up conference with E. Reubel and M. Garbe (both of DA) regarding finalizing objection and declaration (.2); finalize draft confirmation objection (.9); emails with D. Cica (CC) regarding same (.3).	RLL	0.60	540.00
11/07/22	Emails with L. Schlusel (KDW) plan objection strategy and debtor response to discovery requests (.3); emails (.1) and call (.2) with counsel to Piazza, T. Polotowicz and G. Garman (both GL) and J. Adams (KDW) regarding potential settlement of plan objection.	JRA	1.00	900.00
11/07/22	Review updated version of plan objection (.3) and Dundon supporting declaration (.2); correspondence on Piazza deposition issues (.3); conference with R. LeHane (KDW) and G. Garman (GL) regarding potential settlement (.2).	RV	0.30	210.00
11/09/22	Review Reubel declaration in support of confirmation objection (.1); correspond with T. O'Steen (CC) regarding same (.1); correspond with D. Cica (CC) and L. Schlusel (KDW) regarding objection filing (.1).	JRA	0.60	540.00

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	deposition and provide comments to same (.1); correspondence with D. Grey (GL), counsel for Meacher and debtors regarding participation at Piazza deposition (.3); correspondence with S. Seflin (BG) regarding same and LVDF participation (.2).			
11/09/22	Multiple emails from J. Adams (KDW) and D. Cica (CC) regarding Piazza deposition and participation by counsel for plan objectors (.3); call with S. King (DA) regarding property and water rights appraisal (.2); emails from B. Shapiro, counsel to LVDF (.2) and D. Grey, counsel to Meacher (.2) regarding attendance at Piazza deposition.	RLL	0.90	810.00
11/09/22	Review stipulation between the debtor and LVDF regarding LVDF plan treatment.	LSS	0.30	265.50
11/10/22	Conference with R. LeHane (KDW) regarding plan depo, settlement discussions, next steps.	JRA	0.20	180.00
11/10/22	Strategy conferences with J. Adams (KDW) regarding plan objection settlement discussions.	RLL	0.20	180.00
11/11/22	Review voting and tabulation results (.3); review response to plan objection from the debtor (.5) and joinder from FS DIP (.2) and Piazza (.2) to same; review debtor's motion to strike certain factual arguments contained in committee plan objection (.3).	LSS	1.50	1327.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/11/22	Conference with R. LeHane (KDW) regarding voting results, settlement negotiations (.6); call with R. LeHane (KDW) and G. Garman (GL) regarding settlement (.1); follow up call with R. LeHane (KDW) (.2); review debtor reply to UCC plan objection (.4) and motion to strike (.2); review replies from Piazza (.3) and FS DIP (.2).	JRA	2.00	1800.00
11/11/22	Review and analysis voting certification from Stretto (.5); call with J. Adams (KDW) regarding voting results and settlement discussions (.6); calls with counsel to Piazza, G. Garman (GL) along with J. Adams (KDW) regarding settlement discussions (.1); follow up call with J. Adams (KDW) regarding response to proposal (.2).	RLL	1.40	1260.00
11/12/22	Review and analysis of replies to UCC plan objection of Piazza (.2), FS DIP (.2) and debtor (.4); strategy conference with J. Adams, L. Schlussel and R. Vohra (all KDW) regarding response to same (.6); call with counsel to Piazza, G. Garman (GL) and S. Gubner (BG) along with J. Adams (KDW) regarding settlement discussions (.2); follow up call with J. Adams regarding response to proposal and next steps (.2); review analysis of voting and last minute claim objections and emails with L.	RLL	2.20	1980.00

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/12/22	Schlusssel (KDW) regarding same (.4). Phone call with L. Schlusssel (KDW) regarding analysis of claim objections in relation to voting claims and cross referencing underlying large claims (.2); download top 25 proofs of claim (.4); review same for supporting documentation and summarize in spreadsheet for analysis (1.8).	RTB	2.40	1140.00
11/12/22	Strategy conference with R. LeHane, J. Adams and R. Vohra (each of KDW) regarding vote tabulation and additional analysis needed with respect to same (.6); follow-up conference with R. Vohra (KDW) regarding same (.3); conference with R. Bolger (KDW) regarding analysis of highest claims voting to accept the plan (.2); compare top plan rejectors with scheduled claims and spending tab (.8); review analysis from R. Vohra (KDW) regarding results of claims subject to objection voting on the plan (.2); follow-up conference with R. Vohra (KDW) regarding same (.2); draft email to R. LeHane and J. Adams (each of KDW) with results of analysis (.4); further follow-up analysis (.3) and emails with J. Adams (KDW) regarding same (.2); continue to draft email to committee with plan pleadings update (.4).	LSS	3.60	3186.00
11/12/22	Conference with R. LeHane, L. Schlusssel and	JRA	2.10	1890.00

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11/12/22	R. Vohra (all KDW) regarding analysis of voting results (.6); review team analysis to assess voting outcome and potential concerns on same (.6); follow up review of voting results and cross reference claim information (.5); settlement call with R. LeHane (KDW), S. Gubner (BG) and G. Garman (GL) (.2); follow up call with R. LeHane (KDW) (.2). Participate in telephone conference with J. Adams, L. Schluskel and R. LeHane (all of KDW) regarding voting and tabulation results and open issues (.6); follow-up conferences (2x) with L. Schluskel (KDW) regarding open work streams and voting analysis (.5); review omnibus objections to analyze voting results with respect to objected to claims (.6); review voting and tabulation of ballots regarding same (.8); correspond with L. Schluskel and R. Bolger (both of KDW) regarding voting analysis (.1).	RV	2.60	1820.00
11/13/22	Conferences (.2) and correspondence (.3) with R. LeHane (KDW) on status of settlement discussions; correspondence with S. Gubner (BG) regarding settlement terms (.1).	JRA	0.60	540.00
11/13/22	Correspondence (.3) and conference (.2) with J. Adams (KDW) regarding settlement correspondence; follow up correspondence	RLL	0.80	720.00

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11/14/22	with G. Garman (GL) and S. Gubner (BG) regarding same (.3). Emails with D. Cica (CC) regarding case settlement and next steps (.2); conference with E. Reubel (DA) regarding same (.2).	LSS	0.40	354.00
11/15/22	Conference with L. Schlüssel (KDW) regarding plan settlement, next steps in documentation.	JRA	0.20	180.00
11/15/22	Strategy conference with J. Adams (KDW) regarding next steps on committee plan settlement (.2); conferences (3x) with D. Kane (KDW) regarding questions on trust structure and plan (.3); emails with S. Seflin (BG) regarding stipulation providing for amended plan to incorporate committee settlement (.2); review draft stipulation from D. Cica (CC) regarding plan settlement (.2) and revise same to incorporate comments (.2); begin revision to plan to incorporate committee settlement (1.6).	LSS	2.70	2389.50
11/16/22	Continue to revise plan to incorporate committee settlement (2.2); conference with D. Kane (KDW) regarding same (.2); follow-up correspondence with R. LeHane (KDW) regarding same (.2); conference with S. Seflin (BG) regarding status of settlement and modifications to plan to address same (.5); emails with D. Cica and T. O'Steen (each of CC) regarding plan stipulation and email to	LSS	3.30	2920.50

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11/16/22	chambers regarding settlement (.2). Continue drafting relevant trust provisions (.6); call with L. Schlusel (KDW) regarding plan settlement status (.2).	DPK	0.80	632.00
11/17/22	Review draft confirmation order (.7); email to S. Seflin (BG) with comments to same (.1); follow-up conference with S. Seflin (BG) regarding upcoming confirmation hearing and revisions to plan documents to incorporate committee settlement (.3).	LSS	1.10	973.50
11/18/22	Review and comment on stipulation resolving committee objection to plan	RLL	0.30	270.00
11/18/22	Review draft stipulation regarding committee settlement (.2); follow-up emails with R. LeHane and J. Adams (each of KDW) regarding same (.2); follow-up emails with S. Seflin (BG) regarding same (.1); review stipulation regarding lien release (.2); email to R. LeHane (KDW) with summary regarding same (.1).	LSS	0.80	708.00
11/20/22	Review revised confirmation order (.6); emails with S. Seflin (BG) regarding trust agreement and timing for filing same (.1).	LSS	0.70	619.50
11/22/22	Review revised confirmation order from S. Seflin (BG) (.5); revise same to incorporate comments from the committee (.8); conference with S. Seflin (BG) regarding open issues	LSS	1.60	1416.00

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MUMBAI, INDIA

Front Sight Management Committee
Client 029142
Matter 0010
December 8, 2022
Page 16

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/23/22	regarding same and hearing to address open concerns (.3). Strategy conference with L. Schlusel (KDW) regarding comments to confirmation order provisions regarding trust, funds held in reserve and oversight committee issues (.4); review and comment on multiple revisions to confirmation order and liquidating trust agreement (.5); telephone call and emails with counsel to PF, S. Schwartz (SL) regarding same and treatment of reserve funds (.5).	RLL	1.40	1260.00
11/23/22	Review draft liquidating trust agreement (.6); revise same to incorporate oversight committee and other modifications (1.0); review comments to trust agreement from S. Seflin (BG) (.2); conference with R. LeHane (KDW) on same (.4); review additional comments to confirmation order (.3) and trust agreement (.2) from FS DIP.	LSS	2.70	2389.50
11/28/22	Conference with S. Seflin (BG) regarding status of confirmation order and open issues (.3); review proposed final draft of trust agreement (.2); revise same to incorporate additional comments (.2).	LSS	0.70	619.50
11/29/22	Review blackline of revised confirmation order (.4) and emails from S. Seflin (BG) regarding same (.1); email with L. Schlusel (KDW)	RLL	0.70	630.00

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Front Sight Management Committee
Client 029142
Matter 0010
December 8, 2022
Page 17

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	regarding same (.1); emails from all parties with approval of revised confirmation order (.1).			
11/29/22	Review revised version of confirmation order (.3); email to R. LeHane (KDW) regarding same (.1); follow-up email to S. Seflin (BG) regarding committee signoff on same (.1).	LSS	0.50	442.50
11/30/22	Emails from S. Schwartz (SL), counsel to FS Prairie Fire, regarding ownership of inventory and closing delay (.1); email from S. Seflin (BGL) in response to same (.1).	RLL	0.20	180.00
11/30/22	Review emails from S. Seflin (BG) regarding closing issues due to ownership and location of certain firearms (.2) and initial email from S. Schwartz (SL) regarding same (.1).	LSS	0.30	265.50
Total Services for this Matter:				88,956.00
Total this Invoice				\$88,956.00

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Front Sight Management Committee
 Client 029142
 Matter 0010
 December 8, 2022
 Page 18

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
DPK	Kane, Dana P	0.80	790.00	\$632.00
JRA	Adams, Jason	17.60	900.00	15,840.00
LSS	Schlussel, Lauren	49.40	885.00	43,719.00
RLL	LeHane, Robert L	17.10	900.00	15,390.00
RTB	Bolger, Ryan T	3.40	475.00	1,615.00
RV	Vohra, Ravi	16.80	700.00	11,760.00

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 175 GREENWICH STREET
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ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862939

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$12,404.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$12,404.00

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BANK: JP MORGAN CHASE, N.A.
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ACCOUNT #:135-046110
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AS PAYMENT REFERENCE**

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December 8, 2022
Invoice No. 2862939

Client 029142
Matter 0011 Committee and Creditor Communications

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/01/22	Prepare for (.5) and participate in call with committee (1.5); correspond with M. Eagleton regarding status of voting and plan objections (.3).	RLL	2.30	\$2070.00
11/01/22	Email to committee members regarding upcoming committee call.	LSS	0.20	177.00
11/02/22	Emails with committee member D. Streck regarding plan objection and his comments to same.	RLL	0.20	180.00
11/02/22	Email to committee with draft confirmation objection.	LSS	0.20	177.00
11/03/22	Emails with committee members regarding plan negotiations, voting and claim reconciliation process (.6); review and respond to emails from numerous creditors regarding objections to proposed plan (.6); call with D. Cica (CC) to coordinate tracking and response to creditor emails (.2).	RLL	1.40	1260.00
11/04/22	Review and respond to multiple emails from creditors objecting to plan (1.3); email update to committee members regarding status of plan	RLL	2.90	2610.00

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Front Sight Management Committee

Client 029142

Matter 0011

December 8, 2022

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	negotiations and objection (.5); follow up emails with committee members M. Eagleton (.2), G. Cecci (.1), S. Heun (.2), and D. Streck (.2) regarding same; email update to committee members regarding discussions with Piazza counsel and extension of objection deadline (.4).			
11/05/22	Emails with multiple creditors regarding objections to claim and payments to Piazza.	RLL	0.60	540.00
11/07/22	Emails with committee members regarding settlement negotiations with Piazza (.7); emails from multiple creditors about objections to plan (.3).	RLL	1.00	900.00
11/07/22	Review draft email from R. Vohra (KDW) with pleadings update (.2) and revise same (.4).	LSS	0.60	531.00
11/07/22	Prepare email to the committee regarding summaries of Meacher objection to confirmation (.3), US Trustee objection to confirmation (.3), and stipulation between the debtor and LVDF (.2).	RV	0.80	560.00
11/11/22	Begin draft email to committee with update on recent pleadings.	LSS	0.60	531.00
11/12/22	Review draft email to committee with update on recent pleadings.	LSS	0.30	265.50
11/13/22	Emails and calls with committee members D. Streck (.3), M. Eagleton. (.2), and G. Cecchi (.1) regarding plan settlement discussions.	RLL	0.60	540.00

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Front Sight Management Committee
Client 029142
Matter 0011
December 8, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/17/22	Emails with committee regarding status of plan settlement and trust governance discussions (.3); call (.2) and email (.1) with committee member D. Streck and call with committee member S. Heun (.1) regarding oversight committee participation and settlement of plan objection.	RLL	0.70	630.00
11/18/22	Emails with committee member M. Eagleton regarding oversight committee and settlement of plan objection (.3); emails with committee member S. Heun regarding same (.3); email to committee with report on confirmation hearing (.5).	RLL	1.10	990.00
11/29/22	Draft email to committee with update on confirmation order and trust agreement (.3); emails with T. Donaghy regarding process for filing proofs of claim (.2).	LSS	0.50	442.50
Total Services for this Matter:				12,404.00
Total this Invoice				\$12,404.00

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Front Sight Management Committee
Client 029142
Matter 0011
December 8, 2022
Page 4

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlussel, Lauren	2.40	885.00	\$2,124.00
RLL	LeHane, Robert L	10.80	900.00	9,720.00
RV	Vohra, Ravi	0.80	700.00	560.00

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175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2862878

029142 Front Sight Management Committee
0013 Court Hearings

Account Summary And Remittance Form

Legal Services:	\$4,140.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$4,140.00

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December 8, 2022
 Invoice No. 2862878

Client 029142
 Matter 0013 Court Hearings

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/18/22	Prepare for (1.1) and attend hearing (3.5) on plan confirmation and claim objections.	RLL	4.60	\$4140.00
Total Services for this Matter:				4,140.00
Total this Invoice				\$4,140.00

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Client 029142
Matter 0013
December 8, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLL	LeHane, Robert L	4.60	900.00	\$4,140.00

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December 8, 2022
Invoice No. 2862882

029142 Front Sight Management Committee
0019 Meetings/Communications with Debtors

Account Summary And Remittance Form

Legal Services:	\$4,230.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$4,230.00

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175 Greenwich Street
New York, NY 10007December 8, 2022
Invoice No. 2862882Client 029142
Matter 0019 Meetings/Communications with Debtors

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/03/22	Correspondence with S. Seflin (BG) regarding debtor position on reconsideration of claim objections and justification for same.	JRA	0.10	\$90.00
11/07/22	Emails with S. Seflin and S. Gubner (BG) regarding Piazza deposition notice, scheduling and confidentiality issues.	RLL	0.20	180.00
11/09/22	Multiple emails from S. Seflin (BG) regarding Piazza deposition and participation by counsel for plan objectors.	RLL	0.30	270.00
11/10/22	Calls with S. Gubner (BG) regarding UCC plan objection and Piazza deposition.	RLL	0.20	180.00
11/13/22	Call and email with G. Garman (GL) regarding plan objection settlement (.6); email with S. Gubner (BG) regarding same (.2).	RLL	0.80	720.00
11/15/22	Call and email with counsel to Piazza, G. Garman (GL), regarding plan objection settlement (.3); email with S. Gubner (BG) regarding same (.3); emails with S. Seflin (BG) regarding settlement stipulation (.2).	RLL	0.80	720.00
11/16/22	Call and emails with S. Gubner (BG) (.2) and G. Garman (GL) (.2) regarding plan settlement	RLL	0.60	540.00

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Front Sight Management Committee
Client 029142
Matter 0019
December 8, 2022
Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	discussion; emails with S. Seflin (BG) regarding plan objection settlement stipulation (.2).			
11/17/22	Multiple calls with S. Gubner and S. Seflin (both BG), P. Huygens (Province), and G. Garman (GL) regarding settlement of plan issues and administrative expense issues (.8); follow up email with S. Seflin (BG) (.2) and call with G. Garman (GL) (.2) regarding same.	RLL	1.20	1080.00
11/23/22	Review multiple emails from S. Seflin (BG) regarding comments to confirmation order and treatment of funds to be held in reserve.	RLL	0.50	450.00
Total Services for this Matter:				4,230.00
Total this Invoice				\$4,230.00

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Front Sight Management Committee
Client 029142
Matter 0019
December 8, 2022
Page 3

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JRA	Adams, Jason	0.10	900.00	\$90.00
RLL	LeHane, Robert L	4.60	900.00	4,140.00

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ACCOUNT NAME:KELLEY DRYE & WARREN LLP
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175 Greenwich Street
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December 8, 2022
Invoice No. 2862881

029142 Front Sight Management Committee
0020 Insider Investigation

Account Summary And Remittance Form

Legal Services:	\$45,274.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$45,274.00

Terms: Payment Due On or Before December 31, 2022

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December 8, 2022
Invoice No. 2862881

Client 029142
Matter 0020 Insider Investigation

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/01/22	Meet and confer with W. Gyves, J. Adams and L. Schlüssel (all KDW) regarding Piazza deposition strategy.	RLL	0.30	\$270.00
11/01/22	Conference with R. LeHane, W. Gyves and L. Schlüssel (all KDW) regarding Piazza deposition preparation.	JRA	0.30	270.00
11/01/22	Prepare for and participate in telephone conference with KDW team regarding deposition strategy (.3); review relevant case background documents (1.2); begin identifying investigation areas regarding Piazza's background (.2).	WSG	1.70	1419.50
11/02/22	Review prior class action complaint and emails between Piazza and various levels of membership.	RLL	0.70	630.00
11/02/22	Review relevant emails (.4); correspondence with KDW team regarding deposition logistics (.1).	WSG	0.50	417.50
11/02/22	Email to W. Gyves (KDW) regarding rescheduling of Piazza deposition (.1); follow-up email to T. Pilatowicz (GTG) and S.	LSS	0.70	619.50

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Client 029142

Matter 0020

December 8, 2022

Page 2

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	Seflin (BG) regarding same (.1); initial review of emails produced responsive to committee information requests (.3); email to W. Gyves (KDW) regarding same (.2).			
11/03/22	Review draft Dundon declaration in preparation for Piazza deposition.	WSG	0.60	501.00
11/03/22	Emails with S. Seflin (BG) regarding Piazza declaration and subject of deposition.	LSS	0.30	265.50
11/04/22	Review second amended plan and disclosure statement in preparation for I. Piazza deposition.	WSG	1.40	1169.00
11/05/22	Review draft of committee objection in preparation for Piazza deposition.	WSG	0.40	334.00
11/07/22	Correspond with W. Gyves (KDW) regarding preparation for deposition of I. Piazza.	EAH	0.30	142.50
11/07/22	Follow-up emails with S. Seflin (BG) regarding production of member emails (.3); review email from S. Seflin and S. Gubner (each of BG) regarding Piazza deposition and expansion to members (.3); strategy conference with D. Cica (CC) regarding same (.3); review draft stipulation limiting deposition (.2).	LSS	1.10	973.50
11/08/22	Pull key case documents for review by W. Gyves (KDW) for deposition preparation.	EAH	0.70	332.50
11/08/22	Review initial information produced on insider investigation to share with W. Gyves (KDW) (.4); conference with E. Reubel (DA) regarding	LSS	0.60	531.00

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Front Sight Management Committee
Client 029142
Matter 0020
December 8, 2022
Page 3

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/08/22	same (.1); emails with W. Gyves (KDW) regarding same (.1). Correspondence with L. Schlüssel (KDW) on background information and correspondence produced by debtor (.4); begin preparing for Piazza deposition and attention to logistics regarding same (3.3).	WSG	3.70	3089.50
11/09/22	Upload additional documents to Sharefile and rename.	MMV	0.30	100.50
11/09/22	Continue preparing for I. Piazza deposition.	WSG	4.30	3590.50
11/09/22	Correspond with T. Herod (KDW) regarding amended Piazza deposition notice (.1); review correspondence from W. Gyves and T. Herod (both of KDW) regarding same (.1).	RV	0.20	140.00
11/09/22	Review comments from S. Seflin (BG) to confidentiality stipulation (.2); review emails from D. Grey, counsel for Meacher, regarding attendance at hearing (.2).	LSS	0.40	354.00
11/10/22	Discuss logistics regarding deposition with W. Gyves (KDW) (.1); correspond with R. Vohra (KDW) regarding same (.1); organize the I. Piazza deposition (.4).	EAH	0.60	285.00
11/10/22	Conference with L. Schlüssel (KDW) in preparation for Piazza declaration (.4); continue preparing for I. Piazza deposition (3.7); conference with R. LeHane (KDW) on settlement status (.4).	WSG	4.50	3757.50

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

WASHINGTON
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HOUSTON

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AFFILIATE OFFICE:
MUMBAI, INDIA

Front Sight Management Committee

Client 029142

Matter 0020

December 8, 2022

Page 4

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/10/22	Strategy conference with W. Gyves (KDW) regarding questions for upcoming deposition of Piazza (.4); follow-up email to E. Reubel and M. Garbe (each of DA) regarding same (.1); review information from Dundon regarding PrairieFire (.2); follow-up email to W. Gyves (KDW) regarding same (.1).	LSS	0.80	708.00
11/10/22	Strategy conference with W. Gyves (KDW) regarding response to settlement proposal.	RLL	0.40	360.00
11/11/22	Prepare for and organize I. Piazza deposition (.3); discuss preparation plan with W. Gyves (KDW) (.1).	EAH	0.40	190.00
11/11/22	Conference with E. Reubel (DA) regarding follow-up on open question for Piazza deposition (.3); email correspondence with W. Gyves (KDW) regarding LLC versus Inc. designation of debtor entity (.3).	LSS	0.60	531.00
11/11/22	Continue preparing for I. Piazza deposition (6.0); conference with T. Herod (KDW) regarding same (.1); strategy conference with R. LeHane and J. Adams (both KDW) regarding deposition strategy (.8).	WSG	6.90	5761.50
11/11/22	Conference with W. Gyves and R. LeHane (partial) (both KDW) regarding preparation for Monday's Piazza deposition.	JRA	0.80	720.00
11/11/22	Strategy conference with W. Gyves and J. Adams (both KDW) regarding topics and	RLL	0.30	270.00

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Front Sight Management Committee
Client 029142
Matter 0020
December 8, 2022
Page 5

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
11/12/22	approach to Piazza deposition. Review email from W. Gyves (KDW) regarding debtor voting (.1); review disclosure statement regarding same (.1); draft email to W. Gyves (KDW) with information regarding same (.1).	LSS	0.30	265.50
11/12/22	Continue preparing for I. Piazza deposition.	WSG	7.80	6513.00
11/13/22	Prepare exhibits for I. Piazza deposition (3.8); meet with W. Gyves (KDW) to discuss planning for deposition (.4).	EAH	4.20	1995.00
11/13/22	Continue preparing for I. Piazza deposition (8.3); conferene with T. Herod (KDW) regarding same (.4); telephone conference with R. LeHane and J. Adams (both KDW) regarding potential resolution (.4).	WSG	9.10	7598.50
11/13/22	Conference with R. LeHane and W. Gyves (both KDW) regarding settlement status, deposition preparation.	JRA	0.40	360.00
11/13/22	Conference with W. Gyves and J. Adams (both KDW) on settlement status, deposition preparation.	RLL	0.40	360.00
11/14/22	Correspond with R. Vohra, W. Gyves, and L. Schlüssel (all of KDW) regarding cancellation of deposition.	EAH	0.20	95.00
11/14/22	Emails with court reporter and proposed attendees regarding cancellation of Piazza deposition (.2); follow-up email to D. Grey,	LSS	0.40	354.00

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Front Sight Management Committee
 Client 029142
 Matter 0020
 December 8, 2022
 Page 6

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
	counsel for Meacher, regarding same (.2).			
	Total Services for this Matter:			45,274.00
	Total this Invoice			\$45,274.00

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Front Sight Management Committee
Client 029142
Matter 0020
December 8, 2022
Page 7

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
EAH	Herod, Ted	6.40	475.00	\$3,040.00
JRA	Adams, Jason	1.50	900.00	1,350.00
LSS	Schluskel, Lauren	5.20	885.00	4,602.00
MMV	Vicinanza, Marie M	0.30	335.00	100.50
RLL	LeHane, Robert L	2.10	900.00	1,890.00
RV	Vohra, Ravi	0.20	700.00	140.00
WSG	Gyves, William	40.90	835.00	34,151.50

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY **

RUN DATE: December 8, 2022 14:55:33

DATE THRU: November 30, 2022

Page: 2

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

Prebill #: 1832078

FORMAT 021

029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
		11/07/22	Duplication	35.60	H T W	8801401
		11/14/22	Duplication	34.80	H T W	8802341
06892	Gyves , W.S.	11/07/22	FEDEX Invoice # 793819045 029142-0020 SHIPPED ON 11/03/2022 FROM: William S. Gyves 175 Greenwich Street NEW YORK NY 10007, TO: William Gyves, , [REDACTED]	21.92	H T W	8805376
			/Courier			
90075	Glaviano , P.	11/14/22	FEDEX Invoice # 794539321 029142-0020 SHIPPED ON 11/09/2022 FROM: Patricia Glaviano 3 World Trade Center NEW YORK NY 10007, TO: William S. Gyves, , [REDACTED]	22.43	H T W	8802820
			/Courier			
06892	Gyves , W.S.	11/14/22	FEDEX Invoice # 794539321 029142-0020 SHIPPED ON 11/08/2022 FROM: William S. Gyves 175 Greenwich Street NEW YORK NY 10007, TO: William Gyves, , [REDACTED]	22.43	H T W	8802821
			/Courier			
06892	Gyves , W.S.	11/10/22	Certified Copies : Fees re certified copies re Front Sight Management LLC	267.00	H T W	8802418
07036	Adams , J.R.	11/15/22	Miscellaneous Expense : Remote VideoConference	395.00	H T W	8803514
07979	Vohra , R.	11/01/22	Cab Service : Transaction Date: 11/01/22; late care home; Office/Home	14.76	H T W	8803707
07979	Vohra , R.	11/03/22	Cab Service : Transaction Date: 11/03/22; late care home; Office/Home	14.06	H T W	8803708
06892	Gyves , W.S.	11/11/22	Cab Service : Transaction Date: 11/11/22; Uber to NY Office 11/11 re: Front Sight.; to office, from home	52.59	H T W	8802090

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DATE THRU: November 30, 2022

Page: 3

Billing Timekeeper: 06284 - LeHane, Robert L

Responsible Timekeeper: 06284 - LeHane, Robert L

Prebill #: 1832078

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029142 - Front Sight Management Committee

0001 - Case Administration

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
06892	Gyves , W.S.	11/12/22	Cab Service : Transaction Date: 11/12/22; Uber to home /from NY office on 11/12 re: Front Sight.; to home, from NY office	95.93	H T W	8802273
06892	Gyves , W.S.	11/12/22	Cab Service : Transaction Date: 11/12/22; Uber to NY office 11/12 re: Front Sight.; to office, from home	53.65	H T W	8802274
06892	Gyves , W.S.	11/13/22	Cab Service : Transaction Date: 11/13/22; Uber to NY office 11/13 re Front Sight.; to office, from home	125.58	H T W	8802270
06892	Gyves , W.S.	11/13/22	Cab Service : Transaction Date: 11/13/22; Uber to home 11/13 re Front Sight.; to home, from NY office	92.77	H T W	8802272
06997	Schlussel , L.S.	11/02/22	Westlaw Research	178.75	H T W	8804236
06997	Schlussel , L.S.	11/03/22	Westlaw Research	145.96	H T W	8804237
07979	Vohra , R.	11/01/22	Lexis Research	9.86	H T W	8804925
07979	Vohra , R.	11/01/22	Lexis Research	167.85	H T W	8804926
07979	Vohra , R.	11/02/22	Lexis Research	59.24	H T W	8804927
07979	Vohra , R.	11/03/22	Lexis Research	9.86	H T W	8804928
Totals:				\$1,820.04		

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RUN DATE: December 8, 2022 14:55:33

DATE THRU: November 30, 2022

Page: 5

Billing Timekeeper: 06284 - LeHane, Robert L
Prebill #: 1832078
029142 - Front Sight Management Committee
0001 - Case Administration

Responsible Timekeeper: 06284 - LeHane, Robert L
FORMAT 021

Other Charges Summary		Amount	Disp		
000203	Duplication	70.40	H	T	W
000206	Courier	66.78	H	T	W
000219	Certified Copies	267.00	H	T	W
000224	Miscellaneous Expense	395.00	H	T	W
000225	Cab Service	449.34	H	T	W
000254	Westlaw Research	324.71	H	T	W
000256	Lexis Research	246.81	H	T	W
	Total	1,820.04			

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AFFILIATE OFFICE:
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863055

029142 Front Sight Management Committee
0001 Case Administration

Account Summary And Remittance Form

Legal Services:	\$0.00
Disbursements and Other Charges:	\$15.75

Total Amount Due: \$15.75

Terms: Payment Due On or Before December 31, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
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(212) 808-7800

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863055

Client 029142
Matter 0001 Case Administration

Attorney: 06284

Page 1

Other Charges:

Meals	\$15.75	
Total Other Charges for this Matter:		15.75
Total this Invoice		\$15.75

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Front Sight Management Committee
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175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863053

029142 Front Sight Management Committee
0010 Disclosure Statement/Plan Issues

Account Summary And Remittance Form

Legal Services:	\$1,321.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$1,321.00

Terms: Payment Due On or Before December 31, 2022

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PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
**PLEASE INDICATE CLIENT, MATTER AND INVOICE NUMBER
AS PAYMENT REFERENCE**

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AFFILIATE OFFICE:
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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863053

Client 029142
Matter 0010 Disclosure Statement/Plan Issues

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
12/01/22	Multiple emails from S. Seflin (BG) (.3) and S. Schwartz (SL) (.3) regarding closing, transfer of funds and disputed registration of firearms; correspondence with L. Schlussel (KDW) regarding same and client updates (.2).	RLL	0.80	\$720.00
12/01/22	Conference with S. Seflin (BG) regarding status of plan effective date and open issues.	LSS	0.30	265.50
12/01/22	Review correspondence from L. Schlussel (KDW) regarding plan effective date.	RV	0.10	70.00
12/02/22	Review emails from S. Seflin (BG) and S. Schwartz (SL), counsel for PrairieFire, regarding revision to A&D books and plan effective date.	LSS	0.30	265.50
Total Services for this Matter:				1,321.00
Total this Invoice				\$1,321.00

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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AFFILIATE OFFICE:
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Front Sight Management Committee
Client 029142
Matter 0010
December 8, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlussel, Lauren	0.60	885.00	\$531.00
RLL	LeHane, Robert L	0.80	900.00	720.00
RV	Vohra, Ravi	0.10	700.00	70.00

PAYMENT BY CHECK:

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NEW YORK, NEW YORK 10007
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PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP

FEDERAL ID NO. 13-5335107

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Front Sight Management Committee
c/o Robert LeHane
175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863054

029142 Front Sight Management Committee
0011 Committee and Creditor Communications

Account Summary And Remittance Form

Legal Services:	\$885.00
Disbursements and Other Charges:	\$0.00

Total Amount Due: \$885.00

Terms: Payment Due On or Before December 31, 2022

Please Return This Page With Your Payment

PAYMENT BY WIRE OR ACH IS PREFERRED:

BANK: JP MORGAN CHASE, N.A.
ABA #: 021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME: KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
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Front Sight Management Committee
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175 Greenwich Street
New York, NY 10007

December 8, 2022
Invoice No. 2863054

Client 029142
Matter 0011 Committee and Creditor Communications

Attorney: 06284

Page 1

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Amount</u>
12/01/22	Email to committee with update on status of plan effective date (.2); follow-up email with further update regarding same (.2).	LSS	0.40	\$354.00
12/02/22	Draft email to committee regarding plan effective date and bar date (.4); follow-up emails with S. Heun (.1) and D. Streck (.1) regarding same.	LSS	0.60	531.00
Total Services for this Matter:				885.00
Total this Invoice				\$885.00

KELLEY DRYE & WARREN LLP

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Front Sight Management Committee
Client 029142
Matter 0011
December 8, 2022
Page 2

<u>Tkpr</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LSS	Schlusssel, Lauren	1.00	885.00	\$885.00

PAYMENT BY CHECK:

KELLEY DRYE & WARREN LLP
ATTN: TREASURER'S DEPARTMENT
3 WORLD TRADE CENTER
175 GREENWICH STREET
NEW YORK, NEW YORK 10007
(212) 808-7800

PAYMENT BY WIRE:

JP MORGAN CHASE, N.A.
ABA #:021-000-021
SWIFT CODE: CHASUS33
ACCOUNT NAME:KELLEY DRYE & WARREN LLP
ACCOUNT #:135-046110
PLEASE INDICATE CLIENT, MATTER AND
INVOICE NUMBER AS PAYMENT REFERENCE

KELLEY DRYE & WARREN LLP
**** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY ****

RUN DATE: December 8, 2022 16:31:32
Billing Timekeeper: 06284 - LeHane, Robert L
 Prebill #: 1832127
029142 - Front Sight Management Committee
0001 - Case Administration

DATE THRU: December 2, 2022

Page: 1
Responsible Timekeeper: 06284 - LeHane, Robert L
 FORMAT 021

c/o Robert LeHane
 175 Greenwich Street
 New York, NY 10007

Other Charges/Disbursements

Atty ID	Attorney	Date	Description	Bill Amount	Disp.	Disb Id
07917	Herod , E.A.	11/13/22	GrubHub Holdings Inc. f/k/a Seamless invoice SL-2580-133 Meals from POKE BOWL delivered on 2022-11-13 14:08:22 EST for Edwin Herod ordered by Edwin HerodMeals	15.75	H T W	8806218
Totals:				\$15.75		

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**** CONFIDENTIAL WORK SHEET FOR INTERNAL USE ONLY ****

RUN DATE: December 8, 2022 16:31:32

DATE THRU: December 2, 2022

Page: 2

Billing Timekeeper: 06284 - LeHane, Robert L
Prebill #: 1832127
029142 - Front Sight Management Committee
0001 - Case Administration

Responsible Timekeeper: 06284 - LeHane, Robert L
FORMAT 021

Other Charges Summary		Amount	Disp
000226	Meals	15.75	H T W
	Total	15.75	

Exhibit 4**COMPENSATION BY TIMEKEEPER
JUNE 13, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022**

NAME OF PROFESSIONAL: PARTNERS & SPECIAL COUNSEL	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Robert L. LeHane (Partner)	Bankruptcy	1999	\$900.00	203.7	\$183,330.00
William S. Gyves (Partner)	Litigation	1991	\$835.00	42.8	\$35,738.00
Jason R. Adams (Partner)	Bankruptcy	2000	\$900.00	226.7	\$204,030.00
Melissa L. Gelade (Partner)	Real Estate	2000	\$690.00	1.7	\$1,173.00
Dana P. Kane (Special Counsel)	Bankruptcy	1998	\$790.00	0.8	\$632.00
Lauren S. Schlusel (Special Counsel)	Bankruptcy	2009	\$885.00	358.9	\$317,626.50
Total Partners & Special Counsel:				834.6	\$742,529.50

NAME OF PROFESSIONAL: ASSOCIATES	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Philip A. Weintraub (Senior Associate)	Bankruptcy	2005	\$700.00	56.5	\$39,550.00
Ravi Vohra (Senior Associate)	Bankruptcy	2013	\$700.00	151.8	\$106,260.00
Connie Y. Choe (Associate)	Bankruptcy	2020	\$515.00	15.7	\$8,085.50
Ryan T. Bolger (Associate)	Bankruptcy	2021	\$475.00	7.2	\$3,420.00
Total Associates:				231.2	\$157,315.50

NAME OF PROFESSIONAL: SUMMER ASSOCIATES & LAW CLERKS	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Emily R. Maloof (Summer Associate)	N/A	N/A	\$300.00	17.2	\$5,160.00
Daniel McAuliffe (Summer Associate)	N/A	N/A	\$300.00	18.0	\$5,400.00
Edwin A. Herod (Law Clerk)	N/A	2022	\$475.00	6.4	\$3,040.00
Total Summer Associates & Law Clerks:				41.6	\$13,600.00

NAME OF PROFESSIONAL: PARAPROFESSIONALS	DEPARTMENT	YEAR OF LAW SCHOOL GRADUATION	HOURLY RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Marie M. Vicinanza	Bankruptcy	N/A	\$335.00	11.7	\$3,919.50
Sherlly Alceus	Bankruptcy	N/A	\$295.00	21.6	\$6,372.00
Total Paraprofessionals:				33.3	\$10,291.50

	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners and Special Counsel	\$889.68	834.6	\$742,529.50
Associates, Summer Associates & Law Clerks	\$626.52	272.8	\$170,915.50
Paraprofessional	\$309.05	33.3	\$10,291.50
Blended Attorney Rate	\$844.29		
Blended Professionals Rate	\$809.80		
Totals:		1,140.7	\$923,736.50

Exhibit 5**CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

Category of Timekeeper	Blended Hourly Rate	
	Billed or Collected in 2021 (Excluding Bankruptcy) ¹	Billed in this Fee Application
Partner	\$832.96	\$893.39
Special Counsel	\$717.01	\$884.79
Senior Associate (6 or more years since first admission)	\$623.44	\$700.00
Associate (0-5 years since first admission)	\$523.89	\$502.42
Paraprofessionals	\$310.62	\$309.05
All timekeepers aggregated	\$644.83	\$809.80

¹ Under the UST Guidelines, “preceding year” means “either the applicant’s prior completed fiscal year or a rolling 12-month year.” Kelley Drye’s blended rates reflect work performed in Kelley Drye’s 2021 fiscal year in Kelley Drye’s domestic offices, excluding all data from bankruptcy matters.

Exhibit 6**KELLEY DRYE EXPENSE SUMMARY**
SEPTEMBER 1, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022

EXPENSE	AMOUNT
Legal Research	\$3,183.43
Cab Service	\$449.34
Certified Copies	\$267.00
Courier	\$66.78
Duplication	\$70.40
Zoom Fees	\$395.00
Meals	\$15.75
Totals:	\$4,447.70

Exhibit 7**KELLEY DRYE EXPENSE SUMMARY**
JUNE 13, 2022 THROUGH AND INCLUDING DECEMBER 2, 2022

EXPENSE	AMOUNT
Legal Research	\$3,805.27
Telephone	\$61.93
Pacer	\$192.10
Cab Service	\$449.34
Certified Copies	\$267.00
Courier	\$66.78
Duplication	\$70.40
Zoom Fees	\$395.00
Meals	\$15.75
Totals:	\$5,323.57

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

Case No.: 22-11824-abl Chapter: 11 Hearing Date/Time: 01/09/23 at 9:30 am

Debtor: Front Sight Management LLC

Applicant: Kelley Drye & Warren LLP

Date of Employment: July 29, 2022, effective as of June 13, 2022

Interim Fee Application No. Second and Final

Amounts Requested: **Client Approval:** Yes No

Fees \$933,736.50¹

Expenses \$5,323.57

Total \$939,060.07

Hours 1,140.7

Blended Rate: \$809.80

Fees Previously Requested: 484,299.50 **Awarded:** \$484,299.50

Expenses Previously Requested: \$875.87 **Awarded:** \$875.87

Total Previously Requested: \$485,175.37 **Awarded:** \$485,175.37

Total Amount Paid: \$485,175.37

I certify under the penalty of perjury that the above is true.

/s/ Robert L. LeHane, Esq.

Signature

Date December 12, 2022

¹ This amount includes an estimated \$10,000 in additional fees and expenses incurred after December 2, 2022 in connection with (i) preparing this Application; and (ii) responding to objections to this Application, if any; and (iii) attending the hearing thereon. Kelley Drye reserves the right to seek additional fees or expenses incurred during the time period indicated above if not included herein: (i) in preparing this Application and reviewing the final fee applications of other professionals; (ii) responding to objections to this Application, if any; and (iii) attending any hearings thereon.