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Counsel to the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

In re:

Case No. 22-11824-abl

Chapter 11

Debtor.

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

DECLARATION OF ERIC A. REUBEL IN SUPPORT OF FINAL FEE APPLICATION OF DUNDON ADVISERS LLC FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL ADVISER TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF FRONT SIGHT MANAGEMENT LLC FOR THE PERIOD OF JUNE 15, 2022 THROUGH AND INCLUDING DECEMBER 9, 2022

I, Eric A. Reubel, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am a member of the financial advisory firm of Dundon Advisers ("Dundon Advisers"), which maintains offices at Ten Bank Street, White Plains, New York, New York 10606. Dundon Advisers is financial adviser to the Official Committee of Unsecured Creditors (the "Committee") of Front Sight Management LLC ("Debtor"). I am familiar with Dundon Advisers' work and billing practices, of relevant documents, and information supplied to me by other attorneys and employees of the firm. If called upon to testify as to the content of this declaration, I could and would competently do so under penalty of perjury.

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- 2. I make this declaration in support of the Final Fee Application of Dundon Advisers for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial adviser to the Official Committee of Unsecured Creditors of Front Sight Management LLC for the Period of June 15, 2022 Through and Including December 9, 2022 (the "Application").
- 3. The Application has been prepared in accordance with the United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases (the "U.S. Trustee Guidelines"), as well as in accordance with Rule 2016 of the Federal Rules of Bankruptcy Procedure.
- 4. I have personally reviewed the information contained in the Application, and the same is true and correct to the best of my knowledge, information and belief.
- 5. I have personally reviewed the bills in this matter, and in my opinion, the charges for legal services and the expenses for which reimbursement are requested represent the actual reasonable fees and charges incurred by my firm in its representation of the Committee.
- 6. The Application is Dundon Advisers' second and final application for allowance of compensation and reimbursement of expenses in the Debtor's chapter 11 case. The Application covers the period from June 15, 2022 through and including December 9, 2022 (the "<u>Final Period</u>").
- 7. Pursuant to the Application, Dundon Advisers requests allowance of compensation in the amount of \$268,436.00 and reimbursement of expenses in the amount of \$0.00 for a total of \$268,436.00 in connection with services provided during the Final Period. During the Final Period, Dundon Advisers' professionals expended a total of 392.0 hours for which compensation is sought.
- 8. All services for which compensation is requested by Dundon Advisers were performed for or on behalf of the Committee, and not on behalf of the Debtor or other persons. There is no agreement or understanding between Dundon Advisers and any other person, other than members of the firm, for the sharing of compensation to be received in this case.
- 9. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (i) the complexity of this case; (ii) the time expended; (iii) the nature and extent of the services rendered; (iv) the value of such services; and (v) the costs of comparable services other than in a case under this title.

I declare under penalty of perjury of the laws of the United States that these facts are true to the best of my knowledge and belief. Respectfully Submitted this 12th day of December 2022. /s/ Eric A. Reubel ERIC A. REUBEL