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1 2 3 4 5 6 7	Nicholas Strozza, Assistant United States Trustee State Bar No. CA 117234 Edward M. McDonald Jr., Trial Attorney State Bar No. NY 4126009 edward.m.mcdonald@usdoj.gov UNITED STATES DEPARTMENT OF JUSTICE Office of the United States Trustee 300 Las Vegas Blvd., So., Ste. 4300, Las Vegas, NV 89101 Cell: (202) 603-5222 Attorneys for the United States Trustee for Region 17 TRACY HOPE DAVIS	
8	UNITED STATES BANKRUPTCY COURT	
9	DISTRICT OF NEVADA	
10	In re:	Case No: 22-11824-ABL
11	FRONT SIGHT MANAGEMENT LLC,	Chapter 11
12 13	Debtor.	Date: January 9, 2023 Time: 9:30 a.m.
13	Debtor.	Place: Telephonic, Foley Courtroom 1
15 16	UNITED STATES TRUSTEE'S NOTICE OF VOLUNTARY REDUCTION IN FEES WITH RESPECT TO CARLYON CICA CHTD.'S SECOND AND FINAL FEE APPLICATION	
17	Tracy Hope Davis, United States Trustee for Region 17, by and through her	
18	undersigned counsel, hereby files this Notice of Voluntary Reduction in Fees with Respect to	
19	the Final Fee Application filed by Carlyon Cica Chtd. ("Applicant") in the above-captioned	
20	case (the "Application"). [ECF Nos. 362 and 600 (first interim and second and final,	
21	respectively)].	
22		
23	In support, the United States Trustee respectfully represents as follows:	
24 25	1. The fee applicant bears the burden of proof to show entitlement to the requested	
26	fees under 11 U.S.C. § 330. See In re Eliapo, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), rev'd in	
27	part on other grounds, 468 F.3d 592 (9th Cir. 2006); In re Ginji Corp., 117 B.R. 983, 990	
28	(Bankr. D. Nev. 1990) ("[t]he applicant has the burden of proof to show the reasonableness of	
	the fees sought").	
	1	

The United States Trustee has reached an agreement with Applicant to resolve the United States Trustee's informal objections to the Application prior to the above-captioned hearing. Applicant has consented to a voluntary reduction of \$2,002.00 to address the United States Trustee's informal objections to the Application.
After accounting for Applicant's voluntary reduction of \$2,002.00 in fees, the Application requests a total of \$147,194.00 in fees and \$2,542.67 in expenses, plus estimated

fees. [See ECF Nos. 362 and 600]. Considering the voluntary reduction, the United States

Trustee does not object to Applicant's second and final request for fees and expenses.

Dated: <u>December 23, 2022</u>

## TRACY HOPE DAVIS UNITED STATES TRUSTEE

<u>/s/ Edward M. McDonald Jr.</u> Edward M. McDonald Jr. Trial Attorney for the United States Trustee