

1 STEVEN T. GUBNER – NV Bar No. 4624
 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*
 2 JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted *Pro Hac Vice*
 BG LAW LLP
 3 300 S. 4th Street, Suite 1550
 Las Vegas, NV 89101
 4 Telephone: (702) 835-0800
 Facsimile: (866) 995-0215
 5 Email: ssubner@bg.law
 sseflin@bg.law
 6 jwellington@bg.law

7 Attorneys for Chapter 11 Debtor

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

11 In re
 12 Front Sight Management LLC,
 13 Debtor.

Case No. 22-11824-abl
 Chapter 11

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

19
 20 **SUPPLEMENT TO BG LAW LLP’S SECOND AND FINAL FEE APPLICATION**

21 BG Law LLP (“BG”), bankruptcy counsel to Front Sight Management LLC (the “Debtor”) in
 22 its chapter 11 bankruptcy case, hereby respectfully submits this supplement (“Supplement”) to its
 23 *Second and Final Fee Application of BG Law LLP, as Bankruptcy Counsel for the Debtor, for the*
 24 *Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses*
 25 [ECF No. 590] (the “Application”) with respect to fees incurred during the period December 10,
 26 2022 through January 3, 2023, which were not included in the Application. BG refers the Court to
 27 the Application for a complete description of the case and work performed by BG on behalf of the
 28 Debtor.

1 Included in the attached **Exhibits 1 through 4** and incorporated herein by this reference is a
2 summary of the supplemental fees (“Supplemental Fees”) incurred by BG. By this Supplement, BG
3 requests additional compensation of \$12,234.50 for services performed by BG from December 10,
4 2022 through January 3, 2023. The Supplemental Fees include time spent by BG: (i) preparing the
5 Application and related pleadings; (ii) preparing the Debtor’s accountant’s final fee application [ECF
6 No. 588]; (iii) corresponding with counsel for the United States Trustee regarding the accountant’s
7 final fee application; (iv) preparing a supplement to the accountant’s final fee application [ECF No.
8 614]; and (v) corresponding with counsel for the United States Trustee regarding the Application.

9 Attached hereto as **Exhibit 5** is the biographical information describing the professional
10 education and experience of BG’s attorneys and paralegals that rendered services in this case from
11 December 10, 2022 through January 3, 2023.

12 BG also requests an additional \$5,400.00 (“Estimated Fees”) for an estimated 8 hours of time
13 to be spent by attorney Susan K. Seflin at her normal hourly rate of \$675.00 for services to be
14 incurred for (i) preparing for the hearing on the Application and the applications of the Debtor’s
15 other professionals, (ii) attending the hearing on the Application and the applications of the Debtor’s
16 other professionals, (iii) preparing orders on the Application and the applications of the Debtor’s
17 other professionals, (iv) preparing this Supplement, and (v) performing other miscellaneous services
18 that arise related to final fee applications.

19 Accordingly, BG respectfully requests the Court enter an order:

- 20 1. Approving the Application;
- 21 2. Allowing on final basis the Supplemental Fees and Estimated Fees in the aggregate
22 amount of \$17,634.50;
- 23 3. Authorizing BG to pay itself \$320,219.30, consisting of the \$302,584.80 (which is the
24 equal to the amount requested in the Application to be paid of \$307,584.80 minus the \$5,000 agreed
25 upon discount with the United States Trustee) plus the Supplemental Fees and Estimated Fees, from
26 the funds maintained in its settlement trust account pursuant to the confirmation order; and

27 ///

28 ///

1 4. For such other and further relief as this Court deems just and proper.

2 DATED: January 6, 2022

BG Law LLP

3

4

By: /s/ Susan K. Seflin
Susan K. Seflin
Jessica S. Wellington
Attorneys for Chapter 11 Debtor

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

EXHIBIT 1



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

For the period from 12/11/2022 through 1/3/2023

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate/Hr</u> | <u>Amount</u> |
|--|-----------------|---|--------------|----------------|-----------------|
| EXHIBIT 1 - FEES FOR PROFESSIONAL SERVICES RENDERED | | | | | |
| [5890.002] | | Front Sight Management Ch. 11 BK 22-11824 | | | |
| <u>[115] Case Administration</u> | | | | | |
| 12/21/2022 | SKS | Review correspondence (multiple) from Sam Schwartz regarding monthly operating report and fee application and prepare correspondence (multiple) regarding same [.7] | 0.7 | \$675.00 | \$472.50 |
| 1/3/2023 | SKS | Review invoice and correspondence from Stretto regarding November fees [.3] | 0.3 | \$725.00 | \$217.50 |
| Subtotal [115] Case Administration | | | 1.0 | | \$690.00 |
| <u>[130] Fee/Employment Applications</u> | | | | | |
| 12/11/2022 | JSW | Draft final fee application for Lucas Horsfall [2.7]; revise declaration of Piazza in support of the same [.1]; draft cover sheet re the same [.1]; revise omnibus notice of hearing re the same [.1]; draft declaration of Sobol in support fo the same [.5] | 3.5 | \$395.00 | \$1,382.50 |
| 12/11/2022 | SKS | Revise BG final fee application [1.1] | 1.1 | \$675.00 | \$742.50 |
| 12/11/2022 | SKS | Revise Lucas Horsfall final fee application [.2]; prepare correspondence to Leslie Sobol regarding same [.2] | 0.4 | \$675.00 | \$270.00 |
| 12/12/2022 | SKS | Revise BG final fee application [2.4] | 2.4 | \$675.00 | \$1,620.00 |
| 12/12/2022 | SKS | Revise Lucas Horsfall final fee application [.9]; prepare emails (multiple) to Leslie Sobol regarding same and review emails regarding same [.3] | 1.2 | \$675.00 | \$810.00 |
| 12/12/2022 | SKS | Review Province final fee application and cover sheet [.2]; revise Province final fee application [.2]; prepare correspondence to Eric Mattson regarding same and review correspondence regarding same [.4]; revise Province declaration [.1] | 0.9 | \$675.00 | \$607.50 |
| 12/12/2022 | SKS | Revise notice of hearing on final fee applications multiple times [.3]; prepare correspondence to Stretto regarding serving and review emails regarding same [.2] | 0.5 | \$675.00 | \$337.50 |
| 12/12/2022 | JSW | Further draft BG's final fee application | 0.8 | \$395.00 | \$316.00 |
| 12/12/2022 | JSW | Further draft notice of final fee applications | 0.7 | \$395.00 | \$276.50 |
| 12/12/2022 | JSW | Analysis of issues re preparing final fee applications for Province, BG and Lucas Horsfall | 0.7 | \$395.00 | \$276.50 |
| 12/12/2022 | JSW | Edit Lucas Horsfall final fee application [.2]; edit declaration of Leslie Sobol in support of the same [.3]; multiple correspondence with Leslie Sobol re the same [.2] | 0.7 | \$395.00 | \$276.50 |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

For the period from 12/11/2022 through 1/3/2023

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate/Hr</u> | <u>Amount</u> |
|-------------|-----------------|--|--------------|----------------|---------------|
| 12/12/2022 | SKS | Conversation with Tracy O'Steen regarding committee professional final fee applications [.1]; prepare emails (multiple) to Ms. O'Steen regarding final fee applications and notice and review emails regarding same [.3] | 0.4 | \$675.00 | \$270.00 |
| 12/12/2022 | JSW | Edit Province's final fee application | 0.5 | \$395.00 | \$197.50 |
| 12/12/2022 | SKS | Revise Gubner declaration in support of final fee application [.1]; prepare correspondence regarding same [.1] | 0.2 | \$675.00 | \$135.00 |
| 12/12/2022 | JSW | Further draft omnibus notice of hearing on final fee applications | 0.3 | \$395.00 | \$118.50 |
| 12/12/2022 | JSW | Draft Province cover sheet to be filed with final fee application | 0.3 | \$395.00 | \$118.50 |
| 12/12/2022 | JSW | Further edit BG's final fee application | 0.3 | \$395.00 | \$118.50 |
| 12/12/2022 | YD | Analysis of revised final version of fee application and review of exhibits and email S. Beck on reverse of payments, review of statement and balance account and review of responses on same and reply thereto. | 0.4 | \$280.00 | \$112.00 |
| 12/12/2022 | JSW | Multiple correspondence with Candace Carlyon re final fee application | 0.2 | \$395.00 | \$79.00 |
| 12/12/2022 | JSW | Further edit Lucas Horsfall's final fee application | 0.2 | \$395.00 | \$79.00 |
| 12/12/2022 | JSW | Further edit Lucas Horsfall final fee application [.1]; email to Leslie Sobol re the same [.1] | 0.2 | \$395.00 | \$79.00 |
| 12/12/2022 | JSW | Revise declaration of S. Gubner in support of BG's final fee application [.1]; revise declaration of Piazza in support of the same [.1] | 0.2 | \$395.00 | \$79.00 |
| 12/12/2022 | JSW | Edit declaration of Huygens in support of Province's final fee application [.1]; email to Paul Huygens re the same [.1] | 0.2 | \$395.00 | \$79.00 |
| 12/12/2022 | SKS | Review correspondence from Ed McDonald regarding LEDES data and prepare email regarding same [.1] | 0.1 | \$675.00 | \$67.50 |
| 12/12/2022 | YD | Prep of email to J. Wellington re BG Final Fee App and finalizing same and Exhibits and further changes and review of J. Wellington response; email to accounting regarding reversing payments and posting same and filed fee app. | 0.2 | \$280.00 | \$56.00 |
| 12/12/2022 | YD | Analysis of email from S. Beck re status of Fee App and reversing payments on same and review of documents and email response on same. | 0.2 | \$280.00 | \$56.00 |
| 12/12/2022 | YD | Analysis of email from S. Gubner re Fee App and tel conference with S. Gubner re reversed payments and Fee App and requests from S. Seflin. | 0.2 | \$280.00 | \$56.00 |
| 12/12/2022 | JSW | Edit Piazza declaration in support of final fee applications | 0.1 | \$395.00 | \$39.50 |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

For the period from 12/11/2022 through 1/3/2023

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate/Hr</u> | <u>Amount</u> |
|---|-----------------|---|--------------|----------------|--------------------|
| 12/12/2022 | JSW | Further revise omnibus notice of hearing on final fee applications | 0.1 | \$395.00 | \$39.50 |
| 12/12/2022 | JSW | Further revise omnibus notice of hearing on final fee applications | 0.1 | \$395.00 | \$39.50 |
| 12/13/2022 | JSW | Multiple emails to Dr. Piazza re declaration in support of final fee applications | 0.2 | \$395.00 | \$79.00 |
| 12/13/2022 | YD | Analysis of email from S. Beck to UST re LEDES BG Fee App and attachments thereto. | 0.2 | \$280.00 | \$56.00 |
| 12/13/2022 | YD | Analysis of documents re BG Fee App and review emails for same and email to J. Studley on same. | 0.2 | \$280.00 | \$56.00 |
| 12/13/2022 | YD | Analysis of email from S. Sefflin re Fee App and S. Beck email on same and LEDES UST request and respond to emails. | 0.2 | \$280.00 | \$56.00 |
| 12/21/2022 | SKS | Conversations (multiple) with Jared Day regarding BG final fee application [.5] | 0.5 | \$675.00 | \$337.50 |
| 12/21/2022 | SKS | Conversation with Athanasios Agelakopoulos regarding reorganized debtor request for BG fee reduction [.5] | 0.5 | \$675.00 | \$337.50 |
| 12/22/2022 | JSW | Call with US Trustee's office to discuss issues with Lucas Horsfall's final fee application [.2]; call to Leslie Sobol re the same [.1]; email to Leslie Sobol re the need to file supplement to final fee application [.1] | 0.4 | \$395.00 | \$158.00 |
| 12/22/2022 | JSW | Call with Leslie Sobol re US Trustee issues with Lucas Horsfall final fee application | 0.3 | \$395.00 | \$118.50 |
| 12/22/2022 | JSW | Draft supplement to Lucas Horsfall's final fee application | 0.2 | \$395.00 | \$79.00 |
| 1/3/2023 | SKS | Review UST responses to fee applications and prepare chart regarding amount owed to each professional [.9]; prepare correspondence to Tanner James and Paul Huygens regarding same [.2] | 1.1 | \$725.00 | \$797.50 |
| 1/3/2023 | YD | Analysis of documents re Fee App and backup and preparation of proforma of fees and costs for supplement to fee app thru 1/3/2023 and format versions of same (.5); prep of email to J. Wellington on same (.1). | 0.6 | \$325.00 | \$195.00 |
| Subtotal [130] Fee/Employment Applications | | | 21.7 | | \$11,004.50 |
| [170] Plan & Disclosure Statement | | | | | |
| 12/12/2022 | SKS | Analysis of issues regarding funds to be transferred to various reserve accounts and review documents [.4]; conversations (multiple) with Adam Fialkowski regarding Meacher and LVDF reserve accounts [.3]; conversation with Fred Brown [.1] | 0.8 | \$675.00 | \$540.00 |
| Subtotal [170] Plan & Disclosure Statement | | | 0.8 | | \$540.00 |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

For the period from 12/11/2022 through 1/3/2023

| <u>Date</u> | <u>Initials</u> | <u>Description</u> | <u>Hours</u> | <u>Rate/Hr</u> | <u>Amount</u> |
|-------------|-----------------|---|--------------|----------------|--------------------|
| | | Subtotal [5890.002] Front Sight Management Ch. 11 BK 22-11824 | 23.5 | | \$12,234.50 |
| | | Total Fees for Professional Services Rendered: | 23.5 | | \$12,234.50 |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

| EXHIBIT 1 (CONTINUED) - PROFESSIONAL RATE SUMMARY | | | For 2022 | For 2023 | For the period from 12/11/2022 through 1/3/2023 | | |
|---|-----------------------|------------------|----------------|----------------|---|------------------------|---------------------------|
| <u>Initials</u> | <u>Prof Name</u> | <u>Prof Type</u> | <u>Rate/Hr</u> | <u>Rate/Hr</u> | <u>Hours</u> | <u>Blended Rate</u> | <u>Amount</u> |
| JSW | Jessica S. Wellington | Associate | \$395.00 | | 10.2 | | \$4,029.00 |
| SKS | Susan K. Seflin | Partner | \$675.00 | \$725.00 | 11.1 | | \$7,562.50 |
| YD | Yves Derac | Paralegal | \$280.00 | \$325.00 | 2.2 | | \$643.00 |
| Total | | | | | <u>23.5</u> | <u>\$520.62</u> | <u>\$12,234.50</u> |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

EXHIBIT 1 (CONTINUED) - MATTER RATE SUMMARY

| <u>Matter ID</u> | <u>Matter Desc</u> | <u>Hours</u> | <u>Amount</u> |
|------------------|---|--------------------|---------------------------|
| 5890.002 | Front Sight Management Ch. 11 BK 22-11824 | 23.5 | \$12,234.50 |
| | Case Administration | 1.0 | \$690.00 |
| | Fee/Employment Applications | 21.7 | \$11,004.50 |
| | Plan & Disclosure Statement | 0.8 | \$540.00 |
| | Grand Total | <u>23.5</u> | <u>\$12,234.50</u> |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

| EXHIBIT 1 (CONTINUED) - BILLING RECORD SUMMARY | <u>Fees</u> | <u>Total</u> |
|---|---------------------------|---------------------------|
| [5890.002] Front Sight Management Ch. 11 BK 22-11824 | \$12,234.50 | \$12,234.50 |
| Subtotal [115] Case Administration | \$690.00 | \$690.00 |
| Subtotal [130] Fee/Employment Applications | \$11,004.50 | \$11,004.50 |
| Subtotal [170] Plan & Disclosure Statement | \$540.00 | \$540.00 |
| Total | <u>\$12,234.50</u> | <u>\$12,234.50</u> |

EXHIBIT 2



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

EXHIBIT 2 - PROFESSIONAL FEES ACTIVITY SUMMARY

| <u>Matter</u> | <u>Initials</u> | <u>Prof Name</u> | <u>Prof Type</u> | <u>Hours</u> | <u>Avg Rate/Hr</u> | <u>Amount</u> | |
|---------------|-----------------|--|------------------|--------------|--------------------|--------------------|--------------------|
| 5890.002 | | | | | | | |
| | | Front Sight Management Ch. 11 BK 22-11824 | | | | | |
| | | [115] Case Administration | | | | | |
| | SKS | Susan K. Seflin | Partner | 1.0 | \$690.00 | \$690.00 | |
| | | [115] Case Administration Subtotal | | | | 1.0 | \$690.00 |
| | | [130] Fee/Employment Applications | | | | | |
| | SKS | Susan K. Seflin | Partner | 9.3 | \$680.91 | \$6,332.50 | |
| | JSW | Jessica S. Wellington | Associate | 10.2 | \$395.00 | \$4,029.00 | |
| | YD | Yves Derac | Paralegal | 2.2 | \$292.27 | \$643.00 | |
| | | [130] Fee/Employment Applications Subtotal | | | | 21.7 | \$11,004.50 |
| | | [170] Plan & Disclosure Statement | | | | | |
| | SKS | Susan K. Seflin | Partner | 0.8 | \$675.00 | \$540.00 | |
| | | [170] Plan & Disclosure Statement Subtotal | | | | 0.8 | \$540.00 |
| | | 5890.002 Front Sight Management Ch. 11 BK 22-11824 Subtotal | | | | 23.5 | \$12,234.50 |
| | | Total Fees for Professional Services Rendered: | | | | 23.5 | \$520.62 |
| | | | | | | \$12,234.50 | |

EXHIBIT 3



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

| EXHIBIT 3 - MONTHLY FEE SUMMARY | Dec 2022 | Jan 2023 | Total |
|---|---------------------------------------|---------------------------------------|---------------------------------------|
| Matter | <u>Amount</u> <u>Hours</u> | <u>Amount</u> <u>Hours</u> | <u>Amount</u> <u>Hours</u> |
| 5890.002 | <u>\$11,024.50</u> | <u>\$1,210.00</u> | <u>\$12,234.50</u> |
| Front Sight Management Ch. 11 BK 22-11824 | 21.5 | 2.0 | 23.5 |
| [115] Case Administration | <u>\$472.50</u> | <u>\$217.50</u> | <u>\$690.00</u> |
| | 0.7 | 0.3 | 1.0 |
| [130] Fee/Employment Applications | <u>\$10,012.00</u> | <u>\$992.50</u> | <u>\$11,004.50</u> |
| | 20.0 | 1.7 | 21.7 |
| [170] Plan & Disclosure Statement | <u>\$540.00</u> | | <u>\$540.00</u> |
| | 0.8 | | 0.8 |
| Total | <u>\$11,024.50</u> | <u>\$1,210.00</u> | <u>\$12,234.50</u> |
| | 21.5 | 2.0 | 23.5 |

EXHIBIT 4



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

| EXHIBIT 4 - MONTHLY COST SUMMARY | Total |
|---|----------------------|
| <u>Component Description</u> | <u>Amount</u> |
| Total | |



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

| EXHIBIT 4 (CONTINUED) - DETAIL OF HARD COSTS EXCEEDING \$1,000 | | | | |
|---|------------------|------------------|-------------------|---------------|
| <u>Date</u> | <u>Matter ID</u> | <u>Comp Desc</u> | <u>Trans Desc</u> | <u>Amount</u> |
| There are no hard cost transactions that exceed \$1,000.00. | | | | N/A |

EXHIBIT 5



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]



Transactions - FEE APP EXHIBITS - PORTRAIT after logo update

[matter id begins with '5890.002'] and [date is between 12/10/2022 and 1/3/2023 and [statement units > 0.0]

EXHIBIT 5 - BIOGRAPHICAL INFORMATION

For the period from 12/11/2022 through 1/3/2023

Associate **Jessica S. Wellington (JSW)**

Ms. Wellington works in the Firm's bankruptcy department. She obtained her Bachelor of Arts, cum laude, in Family and Consumer Sciences from California State University, Sacramento in 2010 and her Juris Doctor with Great Distinction, Business Concentration and Tax Concentration from The University of the Pacific, McGeorge School of Law in May 2018. She served as Law Clerk to the Honorable Victoria S. Kaufman at the United States Bankruptcy Court for the Central District of California. Ms. Wellington was admitted to the State Bar of California in December 2018.

Partner **Susan K. Seflin (SKS)**

Susan K. Seflin is a Partner of BG Law. Ms. Seflin's practice involves all aspects of bankruptcy and creditor-debtor rights, with particular emphasis on Chapter 11 reorganizations and related litigation. Ms. Seflin received her B.A. in Economics from University of California Berkeley, an MBA from Pepperdine School of Business and Management and her Juris Doctor from Pepperdine University School of Law in Malibu, California (2000). During graduate school, Ms. Seflin externed for the Hon. Arthur M. Greenwald, U.S. Bankruptcy Judge for the Central District of California. Ms. Seflin was admitted to the California State Bar in June 2001.

Paralegal **Yves Derac (YD)**

Mr. Dérac has extensive background in business reorganization, creditors' rights and bankruptcy on behalf of debtors, trustees and creditors in a myriad of industries including manufacturing, marketing and promotion, retail, entertainment, finance, golf courses, real estate development, hospitality, insurance, real estate, shipping, and healthcare. Mr. Dérac received his Bachelor of Science Degree from John Jay College of Criminal Justice (CUNY), New York, New York, and his Paralegal Specialist Certificate in Litigation and Corporate Transactions from Adelphi University, Long Island, New York. Mr. Dérac also completed the first year curriculum in law school at Texas Southern University.

CERTIFICATE OF SERVICE

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On **January 6, 2023**, I served the following document:

SUPPLEMENT TO BG LAW LLP’S SECOND AND FINAL FEE APPLICATION

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

(1) The Court’s CM/ECF List:

- JASON BLUMBERG Jason.blumberg@usdoj.gov
- CANDACE C CARLYON ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com;nrodriguez@carlyoncica.com;9232006420@filings.docketbird.com;Dcica@carlyoncica.com
- CHAPTER 11 - LV USTPRegion17.lv.ecf@usdoj.gov
- DAWN M. CICA dcica@carlyoncica.com, nrodriguez@carlyoncica.com;crobertson@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen@carlyoncica.com;3342887420@filings.docketbird.com
- WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com
- THOMAS H. FELL tfell@fennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com
- PHILIP S. GERSON Philip@gersonnvlaw.com
- STEVEN T GUBNER sgubner@bg.law, ecf@bg.law
- RAMIR M. HERNANDEZ rhernandez@wrightlegal.net, jrcraig@wrightlegal.net;nvbkfiling@wrightlegal.net
- MICHAEL R. HOGUE hoguem@gtlaw.com, LVLitDock@GTLAW.com;flintza@gtlaw.com;navarrom@gtlaw.com
- JASON B KOMORSKY jkomorsky@bg.law
- BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- NICOLE E. LOVELOCK nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com
- EDWARD M. MCDONALD edward.m.mcdonald@usdoj.gov
- DAVID MINCIN dmincin@mincinlaw.com, cburke@mincinlaw.com
- TRACY M. O’STEEN tosteen@carlyoncica.com, crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com
- TERESA M. PILATOWICZ tpilatowicz@gtg.legal, bknotices@gtg.legal
- SAMUEL A. SCHWARTZ saschwartz@nvfirm.com, ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com
- SUSAN K. SEFLIN sseflin@bg.law
- BRIAN D. SHAPIRO brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com;6855036420@filings.docketbird.com
- STRETTO ecf@cases-cr.stretto-services.com, aw01@ecfcbis.com,pacerpleadings@stretto.com
- U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov
- JESSICA S. WELLINGTON jwellington@bg.law, ecf@bg.law

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed January 6, 2023, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY