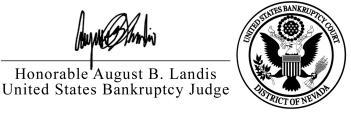
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Honorable August B. Landis



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nuary 11, 2023

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In re:

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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

Case No.: 22-11824-ABL

FRONT SIGHT MANAGEMENT LLC,

Reorganized Debtor.

Chapter 11

ORDER APPROVING STIPULATED SCHEDULING ORDER AND BRIEFING SCHEDULE REGARDING LVDF CLAIM NO. 284 AND REMAINING ADVERSARY CLAIMS

The Court has considered the Stipulated Scheduling Order and Briefing Schedule Regarding LVDF Claim No. 284 and Remaining Adversary Claims (the "Stipulated Scheduling Order")1 between and among Reorganized Debtor Front Sight Management, LLC, a Nevada

Garman Turner Gordon 7251 Amigo Street, Suite 210 Las Vegas, Nevada 89119 (725) 777-3000

¹ Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulated Scheduling Order.

1	Limited Liability Company ("Front Sight"), by and through its counsel, Garman Turner Gordo		
2	LLP, and Las Vegas Development Fund LLC, a Nevada Limited Liability Company ("LVDF")		
3	Robert Dziubla, Jon Fleming, Linda Stanwood, EB5 Impact Advisors LLC ("EB5IA"), and EB5		
4	Impact Capital Regional Center ("EB5IC," and collectively, the "LVDF Parties") by and through		
5	their counsel, Jones Lovelock and LVDF by and through its counsel the Law Office of Brian		
6	Shapiro, and good cause appearing therefor:		
7	IT IS HEREBY ORDERED:		
8	1. The Stipulated Scheduling Order is approved in its entirety.		
9	2. The following terms and deadlines are approved:		
10	Briefing Deadlines:		
11	a. LVDF intends to file an amended Proof of Claim (the "Amended Proof of Claim")		
12	for the purpose of providing a calculation of the amounts sought, bringing the amounts current.		

- for the purpose of providing a calculation of the amounts sought, bringing the amounts current, and providing a declaration of Robert Dziubla, on or before **December 23, 2022**. Front Sight reserves its right to object to the Amended Proof of Claim, including but not limited to, on the
- basis that it is late filed and/or an improper amendment.
 - b. Front Sight shall file an amended Claim Objection (the "Amended Claim Objection") on or before **December 30, 2022**.
 - c. LVDF shall file its opposition to the Amended Claim Objection on or before **January 20, 2023**.
 - d. Front Sight shall file its reply in support of the Amended Claim Objection on or before **February 3, 2023**.
 - **Scope of Discovery**: The Parties shall be permitted to conduct discovery in the Adversary Proceeding and on the Amended Claim Objection.

Fact Discovery.

- a. All fact discovery will be completed by **March 1, 2023**.
- b. The 30(b)(6) deposition Front Sight Management LLC is currently scheduled for January 11, 2023. Front Sight has advised LVDF that it is still assessing who will appear on behalf of Front Sight and that if Ignatius Piazza appears on behalf of Front Sight for some (or all) of the

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- 2023. To the extent that Ignatius Piazza is selected by Front Sight to be its 30(b)(6) witnesses on some (or all) of the 30(b)(6) topics, then the 30(b)(6) deposition of Ignatius Piazza shall take place the week of January 23, 2023. To the extent that a different individual is selected by Front Sight to be its 30(b)(6) witness on some (or all) of the 30(b)(6) topics, then the parties will work together to reschedule the 30(b)(6) deposition to an agreeable time prior to January 23, 2023, if possible. Once scheduled by the parties, that deposition will be a firm setting and LVDF will not move the deposition unless agreed upon in writing or pursuant to court order.
- c. LVDF will vacate the January 4, 2023 deposition of Ignatius Piazza and LVDF may re-notice Ignatius Piazza's deposition at a later date.
- d. The parties previously disclosed initial and rebuttal expert reports in the Adversary Proceeding. In light of the changes in the Adversary Proceeding, the LVDF Claim, and the Claim Objections, the parties agree to disclose on or before January 15, 2023 which prior initial experts each party will be relying upon, whether any prior initial reports will be amended and/or updated, or whether new experts will need to be disclosed. After January 15, 2023, the parties will meet and confer to determine new deadlines for the disclosure of initial expert reports. If the parties cannot agree on a mutually agreeable date, they may request the Court set a date for initial expert report disclosures. Rebuttal expert reports will be due thirty (30) calendar days after the initial expert report disclosure deadline. All expert depositions shall be completed by April 18, 2023.
- All potentially dispositive motions should be filed on or before **April 7, 2023**, with oppositions due on or before April 28, 2023, and replies due on or before May 12, 2023.
- f. Final lists of witnesses and exhibits shall be filed and exchanged on or before May 4, 2023.
- Parties shall file objections to final witness and exhibit lists on or before May 18, g. 2023.
 - h. Motions in limine shall be filed no later than May 11, 2023.

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1	i. Responses to motions in limine shall be filed no later than May 25, 2023.		
2	Respectfully submitted:		
3	GARMAN TURNER GORDON LLP	LAW OFFICE OF BRIAN D. SHAPIRO, LLC	
5	By: <u>/s/ Teresa M. Pilatowicz</u> GREGORY E. GARMAN, ESQ.	By: <u>/s/ Brian D. Shapiro</u> BRIAN D. SHAPIRO, ESQ.	
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7	7251 Amigo Street, Suite 210 Las Vegas, Nevada 89119	Attorneys for Las Vegas Development Fund	
8	Attorneys for Front Sight Management, LLC		
9	JONES LOVELOCK PLLC		
10	By: /s/ Andrea M. Champion		
11	ANDREA M. CHAMPION, ESQ. NICOLE E. LOCELOCK, ESQ.		
12	6600 Amelia Earhart Court, Suite C Las Vegas, Nevada 89119		
13	Attorneys for the LVDF Parties		
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