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Honorable August B. Landis
United States Bankruptcy Judge



Entered on Docket
January 11, 2023

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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:	Case No.: 22-11824-ABL
FRONT SIGHT MANAGEMENT LLC,	Chapter 11
Reorganized Debtor.	

**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

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 Gordon
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,
13 and providing a declaration of Robert Dziubla, on or before **December 23, 2022**. Front Sight
14 reserves its right to object to the Amended Proof of Claim, including but not limited to, on the
15 basis that it is late filed and/or an improper amendment.

16 b. Front Sight shall file an amended Claim Objection (the “Amended Claim
17 Objection”) on or before **December 30, 2022**.

18 c. LVDF shall file its opposition to the Amended Claim Objection on or before
19 **January 20, 2023**.

20 d. Front Sight shall file its reply in support of the Amended Claim Objection on or
21 before **February 3, 2023**.

22 **Scope of Discovery:** The Parties shall be permitted to conduct discovery in the Adversary
23 Proceeding and on the Amended Claim Objection.

24 **Fact Discovery.**

25 a. All fact discovery will be completed by **March 1, 2023**.

26 b. The 30(b)(6) deposition Front Sight Management LLC is currently scheduled for
27 January 11, 2023. Front Sight has advised LVDF that it is still assessing who will appear on behalf
28 of Front Sight and that if Ignatius Piazza appears on behalf of Front Sight for some (or all) of the

1 30(b)(6) topics, he will not be available on or after January 11, 2023 until the week of January 23,
2 2023. To the extent that Ignatius Piazza is selected by Front Sight to be its 30(b)(6) witnesses on
3 some (or all) of the 30(b)(6) topics, then the 30(b)(6) deposition of Ignatius Piazza shall take place
4 the week of January 23, 2023. To the extent that a different individual is selected by Front Sight
5 to be its 30(b)(6) witness on some (or all) of the 30(b)(6) topics, then the parties will work together
6 to reschedule the 30(b)(6) deposition to an agreeable time prior to January 23, 2023, if possible.
7 Once scheduled by the parties, that deposition will be a firm setting and LVDF will not move the
8 deposition unless agreed upon in writing or pursuant to court order.

9 c. LVDF will vacate the January 4, 2023 deposition of Ignatius Piazza and LVDF may
10 re-notice Ignatius Piazza's deposition at a later date.

11 d. The parties previously disclosed initial and rebuttal expert reports in the Adversary
12 Proceeding. In light of the changes in the Adversary Proceeding, the LVDF Claim, and the Claim
13 Objections, the parties agree to disclose on or before **January 15, 2023** which prior initial experts
14 each party will be relying upon, whether any prior initial reports will be amended and/or updated,
15 or whether new experts will need to be disclosed. After January 15, 2023, the parties will meet and
16 confer to determine new deadlines for the disclosure of initial expert reports. If the parties cannot
17 agree on a mutually agreeable date, they may request the Court set a date for initial expert report
18 disclosures. Rebuttal expert reports will be due thirty (30) calendar days after the initial expert
19 report disclosure deadline. All expert depositions shall be completed by **April 18, 2023**.

20 e. All potentially dispositive motions should be filed on or before **April 7, 2023**, with
21 oppositions due on or before **April 28, 2023**, and replies due on or before **May 12, 2023**.

22 f. Final lists of witnesses and exhibits shall be filed and exchanged on or before **May**
23 **4, 2023**.

24 g. Parties shall file objections to final witness and exhibit lists on or before **May 18,**
25 **2023**.

26 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

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