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12 Attorneys for Province, LLC, solely in its capacity as  
 13 the Liquidating Trustee of the Front Sight Creditors Trust

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

16 In re:  
 17 Front Sight Management LLC,  
 18  
 19 Debtor.

Case No. 22-11824-abl

Chapter 11

**Hearing Date:** April 13, 2023

**Hearing Time:** 9:30 a.m.

20 **TWELFTH OMNIBUS OBJECTION TO LATE-FILED PROOFS OF CLAIM**

21 **\*\*IF YOU ARE RECEIVING THIS OMNIBUS OBJECTION IN THE MAIL THEN IT APPLIES**  
 22 **TO YOU AND YOU SHOULD READ THIS DOCUMENT IN FULL\*\***

23 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee  
 24 (the “Liquidating Trustee”)<sup>1</sup> of the Front Sight Creditors Trust (the “Trust”), hereby submits this  
 25

26  
 27 <sup>1</sup> Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of  
 28 reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections  
 in this case except for those relating to Las Vegas Development Fund, LLC and Michael Meacher.

1 twelfth omnibus objection (“Omnibus Objection”) pursuant to Section<sup>2</sup> 502 and Bankruptcy Rule  
 2 3007, to the proofs of claim identified herein. After careful review, the Liquidating Trustee has  
 3 determined that the proofs of claim listed in the chart below (each a “Late-Filed Claim” and  
 4 collectively, the “Late-Filed Claims”) filed by the respective claimants (collectively, the “Claimants”  
 5 and each a “Claimant”)<sup>3</sup> were filed after January 3, 2023.

Claimant	Claim No.	Date Filed	Claim Amount
Dib, Fadi	1064-1	2/14/2023	\$2,765.00
Hale, Kenneth D.	1059-1	1/16/2023 <sup>4</sup>	\$20,000.00
Karnow, Robert F.	1060-1	1/19/2023 <sup>5</sup>	\$450.00
Lippmann, Robert M.	1065-1	2/15/2023 <sup>6</sup>	\$5,000.00
Rougeaux, Ron	1063-1	2/5/2023	\$37,000.00
Slater, Jason	1061-1	1/26/2023	\$198.00

11 The Liquidating Trustee seeks an order disallowing the Late-Filed Claims in the above-  
 12 captioned bankruptcy case. Accordingly, the Liquidating Trustee objects to the Late-Filed Claims  
 13 and respectfully requests entry of an order substantially in the form attached hereto as **Exhibit 2**  
 14 sustaining this Omnibus Objection and disallowing and expunging the Late-Filed Claims in their  
 15 entirety pursuant to Section 502(b) and Bankruptcy Rules 3003 and 3007.<sup>7</sup>

17 **CLAIMANTS RECEIVING THIS OMNIBUS OBJECTION SHOULD LOCATE**  
 18 **THEIR NAMES AND CLAIMS ON PAGES 2 AND 4-5.**

19 This Omnibus Objection is made and based upon the following Memorandum of Points and  
 20 Authorities, the declaration of Amanda Demby Swift (the “Swift Decl.”) filed in support of the  
 21 Omnibus Objection, the papers, pleadings, and other documents on file with the clerk of the Court,

23 <sup>2</sup> References to “Section” refer to the Bankruptcy Code (11 U.S.C. §§ 101 et seq.); references to  
 24 “Bankruptcy Rule” refer to the Federal Rules of Bankruptcy Procedure; and references to “Local  
 Rule” refer to the Local Bankruptcy Rules.

25 <sup>3</sup> As required by Local Rule 3007(a)(4), the first page of each of the Proofs of Claim are attached  
 hereto as **Exhibit 1**.

26 <sup>4</sup> This proof of claim was received by Stretto on January 6, 2023.

27 <sup>5</sup> This proof of claim was received by Stretto on January 18, 2023.

28 <sup>6</sup> This proof of claim was received by Stretto on January 31, 2023.

<sup>7</sup> The Liquidating Trustee expressly reserves the right to object to the Late-Filed Claims on any other  
 grounds that bankruptcy or non-bankruptcy law permits.

1 and judicial notice of which is respectfully requested pursuant to Federal Rule of Evidence 201, and  
2 such other and further evidence as may be provided at the hearing on the Omnibus Objection.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I. JURISDICTION AND VENUE**

5 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and  
6 1334 and Local Rule 1001(b)(1).

7 2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

8 3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

9 4. The statutory predicates for the relief sought herein are Section 11 U.S.C. §§ 105 and  
10 502, Bankruptcy Rule 3007, and Local Rule 3007.

11 5. As required by Local Rule 9014.2, the Liquidating Trustee consents to the entry of  
12 final orders or judgments by this Court if it is determined that this Court, absent consent of the  
13 parties, cannot enter final orders or judgments consistent with Article III of the United States  
14 Constitution.

15 **II. STATEMENT OF FACTS**

16 **A. General Case Background**

17 6. On May 24, 2022, the Debtor filed a voluntary petition for relief under chapter 11 of  
18 the Bankruptcy Code. On June 9, 2022, United States Trustee for Region 17 filed its *Amended*  
19 *Appointment of the Official Committee of Unsecured Creditors* [ECF No. 116].

20 7. On November 29, 2022, the order confirming the Debtor’s second amended chapter  
21 11 plan of reorganization was entered [ECF No. 556] (the “Conformation Order”) pursuant to which  
22 the “Reorganized Debtor” has new ownership and membership on the “effective date” of the plan.  
23 The “effective date” of the plan was December 2, 2022 [ECF No. 584].

24 8. Pursuant to the Confirmation Order, the Trust was created to, among other things,  
25 oversee and administer general unsecured claims, objections thereto, and ultimately distributions on  
26 allowed claims. Accordingly, the Liquidating Trustee is the party in interest as to this Omnibus  
27 Objection.

28

1           9.       On December 5, 2022, the Reorganized Debtor filed a *Notice of: (I) Effective Date of*  
2 *Debtor’s Plan of Reorganization; (II) Administrative Claim Bar Date; (III) Professional*  
3 *Compensation Bar Date; (IV) Claims Objection Deadline; and (V) Bar Date for Claims Arising from*  
4 *Rejection of Memberships* [ECF No. 584] (the “Membership Bar Date Notice”).

5           10.       Pursuant to the Membership Bar Date Notice, the deadline for members to file proof  
6 of claims for claims arising out of rejection of their memberships was January 3, 2023.

7           **B.       General History of the Debtor**

8           11.       In 1998, the Debtor purchased 550 acres of raw land 45 minutes from Las Vegas,  
9 acquired approximately 500 acre feet of water rights and began building the largest private firearms  
10 training facility in the world (the “Front Sight Property”).

11           12.       Historically, the Debtor provided firearms training courses which promoted the  
12 defensive use of various firearms. Courses were offered to the general public, members of law  
13 enforcement and military members.

14           13.       Historically, the Debtor operated its business by selling “lifetime” memberships and  
15 promotional benefits such as “Front Sight Bucks,” TBD memberships, and certificates to use for  
16 training courses, plus the Debtor sold ancillary products. Pre-petition, the Debtor developed a major  
17 expansion plan that contemplated the construction of a vacation and resort development to be known  
18 as the “Front Sight Vacation Club & Resort,” to include vacation residences, an RV park and related  
19 facilities, a retail area, and a pavilion. The Debtor envisioned creating a self-fulfilling ecosystem,  
20 involving memberships and promotional benefits, that would lead to an incentivized customer base  
21 that would take advantage of the club and resort and other offerings to redound to the Debtor’s  
22 benefit.

23           14.       Ultimately, due to facts not relevant to this Omnibus Objection, the Debtor was  
24 unable to expand its business, was facing a foreclosure of the Front Sight Property, and sought  
25 protection under chapter 11 of the Bankruptcy Code to restructure its business.

26           **III.   RELIEF REQUESTED**

27           15.       The Liquidating Trustee has reviewed the Claims Register and the proofs of claim  
28 filed in this case and has determined that each of the Late-Filed Claims were filed by a former

1 member of the Debtor and the claims arise out of rejection of the Claimants' memberships. Each of  
 2 the Late-Filed Claims were filed after January 3, 2023, as summarized in the following table:

Claimant	Claim No.	Date Filed	Claim Amount
Dib, Fadi	1064-1	2/14/2023	\$2,765.00
Hale, Kenneth D.	1059-1	1/16/2023 <sup>8</sup>	\$20,000.00
Karnow, Robert F.	1060-1	1/19/2023 <sup>9</sup>	\$450.00
Lippmann, Robert M.	1065-1	2/15/2023 <sup>10</sup>	\$5,000.00
Rougeaux, Ron	1063-1	2/5/2023	\$37,000.00
Slater, Jason	1061-1	1/26/2023	\$198.00

8  
 9 16. The Liquidating Trustee objects to the Late-Filed Claims and seeks an order  
 10 disallowing and expunging the Late-Filed Claims in their entirety pursuant to Section 502(b) and  
 11 Bankruptcy Rules 3003 and 3007.

#### 12 **IV. BASIS FOR RELIEF**

##### 13 **A. Standard for Disallowance of Proofs of Claims**

14 17. Bankruptcy Rule 3001(f) provides that a "proof of claim executed and filed in  
 15 accordance with these rules shall constitute prima facie evidence of the validity and amount of the  
 16 claim." It is well established in the Ninth Circuit that the initial burden of persuasion for  
 17 establishing the validity and amount of a proof of claim is upon the claimant. *Ashford v.*  
 18 *Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*, 178 B.R. 222 (9th Cir.  
 19 BAP 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996) (a proof of claim must have a writing attached and  
 20 include supporting documentation to qualify for presumptive validity). However, the prima facie  
 21 validity of a claim does not attach unless the claim sets forth the facts necessary to support the claim.  
 22 *Id.* at 226.

23 18. Section 502 authorizes a "party in interest," such as the Liquidating Trustee, to object  
 24 to claims. 11 U.S.C. § 502(a). Once the objector raises "facts tending to defeat the claim by  
 25 probative force equal to that of the allegations of the proofs of claim themselves," then the burden  
 26 reverts to the claimant to prove the validity of the claim by a preponderance of evidence. *Wright v.*

27 <sup>8</sup> This proof of claim was received by Stretto on January 6, 2023.

28 <sup>9</sup> This proof of claim was received by Stretto on January 18, 2023.

<sup>10</sup> This proof of claim was received by Stretto on January 31, 2023.

1 *Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991); *In re Consolidated Pioneer Mortgage*, 178  
2 B.R. at 226. Indeed, the ultimate burden of persuasion is always on the claimant. *In re Holm*, 931  
3 F.2d at 623; *see also In re Heath*, 331 B.R. 424 (9th Cir. BAP 2005) (explaining that a claim that  
4 fails to attach supporting documentation is not entitled to be considered as prima facie evidence of  
5 validity and amount of claim).

6 19. Section 502(b)(1) requires disallowance of a claim if “such claim is unenforceable  
7 against the debtor and property of the debtor, under any agreement or applicable law for a reason  
8 other than because such claim is contingent or unmatured. . .” 11 U.S.C. § 502(b)(1). The  
9 “applicable law” referenced in Section 502(b)(1) includes bankruptcy law as well as other federal  
10 and state laws. *See Cavaliere v. Sapir*, 208 B.R. 784, 786-787 (D. Conn. 1997) (providing that  
11 “applicable law” includes bankruptcy law). A debtor is therefore allowed to raise any federal or  
12 state law defenses to a claim. *See In re G.I. Industries, Inc.*, 204 F.3d 1276, 1281 (9th Cir. 2000)  
13 (stating that a claim cannot be allowed under Section 502(b)(1) if it is unenforceable under  
14 nonbankruptcy law); *Johnson v. Righetti*, 756 F.2d 738, 741 (9th Cir. 1985) (finding that the validity  
15 of the claim may be determined under state law); *In re Eastview Estates II*, 713 F.2d 443, 447 (9th  
16 Cir. 1983) (applying California law).

17 **B. The Late-Filed Claims Should Be Disallowed**

18 20. Section 502(b)(9) provides, in relevant part, that if an “objection to claim is made, the  
19 court, after notice and a hearing, shall determine the amount of such claim . . . and shall allow such  
20 claim in such amount, except to the extent that . . . proof of such claim is not timely filed.” 11  
21 U.S.C. § 502(b)(9).

22 21. As set forth above, each of the Claimants is a former member of the Debtor and each  
23 of the Late-Filed Claims arise out of the rejection of the Claimants’ memberships. Pursuant to the  
24 Membership Bar Date Notice, Claimants were required to file such claims by January 3, 2023. The  
25 Late-Filed Claims were filed after that date.

26 22. Accordingly, the Liquidating Trustee requests that the Late-Filed Claims be  
27 disallowed under Section 502(b)(9), and that the disallowance be applicable and binding for all  
28 purposes.

1           **C.     The Standards Governing Omnibus Objections to Claims Have Been Met**

2           23.     Bankruptcy Rule 3007(d)(4) and (e) govern omnibus objections to late filed proofs of  
3 claim. Bankruptcy Rule 3007(d)(4) specifically allows for omnibus objections to claims if “they  
4 were not timely filed.” Fed. R. Bankr. P. 3007(d)(4). The requirements for omnibus objections are  
5 contained in Bankruptcy Rule 3007(e), which provides that such objections shall:

- 6                     (1) state in a conspicuous place that claimants receiving the  
7 objection should locate their names and claims in the objection; (2)  
8 list claimants alphabetically, provide a cross-reference to claim  
9 numbers, and, if appropriate, list claimants by category of claims;  
10                    (3) state the grounds of the objection to each claim and provide a  
11 cross-reference to the pages in the omnibus objection pertinent to  
12 the stated grounds; (4) state in the title the identity of the objector  
13 and the grounds for the objections; (5) be numbered consecutively  
14 with other omnibus objections filed by the same objector; and (6)  
15 contain objections to no more than 100 claims.

16 Fed. R. Bankr. P. 3007(e).

17           24.     This Omnibus Objection falls within the grounds set forth in Bankruptcy Rule  
18 3007(d)(1). Furthermore, each of the requirements set forth in Bankruptcy Rule 3007(e) have been  
19 complied with or will be complied with upon the filing of this Omnibus Objection. Therefore, this  
20 Omnibus Objection should be sustained.

21           **V.     RESERVATION OF RIGHTS**

22           25.     The Liquidating Trustee specifically reserves the right to amend this Omnibus  
23 Objection, file additional papers in support of this Omnibus Objection or take other appropriate  
24 actions, including, *inter alia*, to: (a) respond to any allegation or defense that may be raised in a  
25 response filed by or on behalf of any of the Claimants or other interested parties; (b) object further to  
26 any claim for which a Claimant provides (or attempts to provide) additional documentation or  
27 substantiation; and (c) object further to any of the claims addressed herein based on additional  
28 information that may be discovered upon further review by the Liquidating Trustee or through  
discovery pursuant to the Bankruptcy Rules.

29           **VI.    SEPARATE CONTESTED MATTERS**

30           26.     Each of the claims and the Liquidating Trustee’s objections thereto constitute a  
separate contested matter as contemplated by Bankruptcy Rules 3007 and 9014 and Local Rule

1 3007. The Liquidating Trustee requests that any order entered by the Court with respect to a  
2 particular claim objected to in this Omnibus Objection be deemed a separate order with respect to  
3 each claim in accordance with Bankruptcy Rule 3007(1).

4 **VII. NOTICE**

5 27. The Liquidating Trustee will serve copies of this Omnibus Objection upon each of the  
6 Claimants identified in the chart contained herein at the addresses listed on the Late-Filed Claims, as  
7 filed.

8 **VIII. CONCLUSION**

9 For the foregoing reasons, the Liquidating Trustee respectfully requests that the Court enter  
10 an order substantially in the form attached hereto as **Exhibit 2**:

11 A. Sustaining the Omnibus Objection, and disallowing the Late-Filed Claims;

12 B. Providing that each of the Late-Filed Claims shall be expunged from the official claims  
13 register in the Debtor's bankruptcy case;

14 C. Providing that for any Late-Filed Claim disallowed pursuant to this Omnibus Objection,  
15 the Claimant forever waives such claim against the Trust, the Liquidating Trustee, the Debtor and its  
16 estate;

17 D. Providing that if any Claimant files or asserts any new claim, or an amendment of any  
18 other proof of claim, related to any of the Late-Filed Claims resolved by this Omnibus Objection,  
19 then such amendment shall be deemed disallowed with prejudice and automatically expunged from  
20 the claims register in the Debtor's case, without further order of this Court;

21 E. Providing that, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, made  
22 applicable in contested matters through Bankruptcy Rules 7054 and 9014, any such ruling on the  
23 Omnibus Objection shall be treated as a final judgment with respect to the Claimants and their  
24 claims subject to such ruling, and determining that there is no just reason for delay in entry of a final  
25 judgment on the claims resolved herein;

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F. Directing and authorizing the clerk of the Court to modify its claims register in this case to expunge the Late-Filed Claims consistent with the terms of the order sustaining this Omnibus Objection; and

G. Granting such other and further relief as the Court deems just and proper.

DATED: February 22, 2023

BG Law LLP

By: /s/ Susan K. Seflin  
Susan K. Seflin  
Jessica S. Wellington  
Attorneys for Province, LLC, solely in its capacity as  
the Liquidating Trustee of the Front Sight Creditors  
Trust

# **EXHIBIT 1**

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 2/14/2023  
 Mary A. Schott, Clerk

**Official Form 410  
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim															
1. Who is the current creditor?	Fadi Dib Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor														
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?														
3. Where should notices and payments to the creditor be sent?	<table border="0"> <tr> <th>Where should notices to the creditor be sent?</th> <th>Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td>Fadi Dib</td> <td></td> </tr> <tr> <td>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</td> <td></td> </tr> <tr> <td>Name 25084 Meredith Hayward, CA 94545</td> <td>Name</td> </tr> <tr> <td>Contact phone 510-432-3946</td> <td>Contact phone</td> </tr> <tr> <td>Contact email fadi.dib@sbcglobal.net</td> <td>Contact email</td> </tr> <tr> <td colspan="2">Uniform claim identifier for electronic payments in chapter 13 (if you use one):</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	Fadi Dib		Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)		Name 25084 Meredith Hayward, CA 94545	Name	Contact phone 510-432-3946	Contact phone	Contact email fadi.dib@sbcglobal.net	Contact email	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)														
Fadi Dib															
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)															
Name 25084 Meredith Hayward, CA 94545	Name														
Contact phone 510-432-3946	Contact phone														
Contact email fadi.dib@sbcglobal.net	Contact email														
Uniform claim identifier for electronic payments in chapter 13 (if you use one):															
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM/DD/YYYY														
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?														

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

Official Form 410  
**Proof of Claim**

04/22

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Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor?  
 Name of the current creditor (the person or entity to be paid for this claim) Kenneth Do Hale  
 Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Name <u>Kenneth Do Hale</u> Number <u>PO Box 287</u> Street _____ City <u>Papaikou, HI</u> State <u>96781</u> ZIP Code _____ Contact phone <u>661-281-8952</u> Contact email <u>khalead54@gmail.com</u>	Name _____ Number _____ Street _____ City _____ State _____ ZIP Code _____ Contact phone _____ Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
 \_\_\_\_\_

**STRETTO**  
**JAN 06 2023**  
**RECEIVED**

4. Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

Fill in this information to identify the case:

Debtor 1 Front Sight Management LLC

Debtor 2 (Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

**Official Form 410**  
**Proof of Claim**

04/22

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Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

- Who is the current creditor? ROBERT F. KARNOW  
Name of the current creditor (the person or entity to be paid for this claim)  
Other names the creditor used with the debtor \_\_\_\_\_
  - Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_
  - Where should notices and payments to the creditor be sent?  
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)  
**STRETTO**  
**JAN 18 2023**  
**RECEIVED**  
OR ROBERT KARNOW@YAHOO.COM
- |   |  |
|---|--|
| <p>Where should notices to the creditor be sent?</p> <p><u>ROBERT F. KARNOW</u><br/>Name</p> <p><u>5630 E. HALF ROUND BAY Rd.</u><br/>Number Street</p> <p><u>HARRISON ID 83833</u><br/>City State ZIP Code</p> <p>Contact phone <u>(916) 769-9045</u></p> <p>Contact email <u>bobthedog427@yahoo.com</u></p> <p>Uniform claim identifier for electronic payments in chapter 13 (if you use one):<br/>-----</p> | <p>Where should payments to the creditor be sent? (if different)</p> <p>_____<br/>Name</p> <p>_____<br/>Number Street</p> <p>_____<br/>City State ZIP Code</p> <p>Contact phone _____</p> <p>Contact email _____</p> |
|---|--|
- Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY
  - Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

**Fill in this information to identify the case:**

Debtor 1 Front Sight Management LLC

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

**Official Form 410**  
**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor? ROBERT M. LIPPMANN  
Name of the current creditor (the person or entity to be paid for this claim)  
Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

<p><b>Where should notices to the creditor be sent?</b></p> <p><u>ROBERT M LIPPMANN</u> Name</p> <p><u>3475 NW HIGH HEAVEN RD</u> Number Street</p> <p><u>Medinaville OH 97128</u> City State ZIP Code</p> <p>Contact phone <u>971-261-0747</u></p> <p>Contact email <u>LippmannBob@gmail.com</u></p>	<p><b>Where should payments to the creditor be sent? (if different)</b></p> <p>_____ Name</p> <p>_____ Number Street</p> <p>_____ City State ZIP Code</p> <p>_____ Contact phone</p> <p>_____ Contact email</p>
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Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
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4. Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

**STRETTO**  
**JAN 31 2023**  
**RECEIVED**

**Fill in this information to identify the case:**

Debtor 1 <u>FRONT SIGHT MANAGEMENT LLC</u>
Debtor 2
(Spouse, if filing)
United States Bankruptcy Court <u>District of Nevada</u>
Case number: <u>22-11824</u>

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 2/5/2023  
 Mary A. Schott, Clerk

**Official Form 410  
 Proof of Claim**

**04/22**

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents**; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	<u>Ron Rougeaux</u>														
	Name of the current creditor (the person or entity to be paid for this claim)														
	Other names the creditor used with the debtor _____														
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____														
<b>3. Where should notices and payments to the creditor be sent?</b>	<table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <th style="background-color: #cccccc; width: 50%; padding: 2px;">Where should notices to the creditor be sent?</th> <th style="background-color: #cccccc; width: 50%; padding: 2px;">Where should payments to the creditor be sent? (if different)</th> </tr> <tr> <td style="padding: 5px;"><u>Ron Rougeaux</u></td> <td style="padding: 5px;"><u>261 Green Mountain Drive</u></td> </tr> <tr> <td style="padding: 5px;">Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</td> <td style="padding: 5px;">Name</td> </tr> <tr> <td style="padding: 5px;"><u>261 Green Mountain Drive palm desert, CA 92211-261</u></td> <td style="padding: 5px;">palm desert, CA 92211</td> </tr> <tr> <td style="padding: 5px;">Contact phone <u>7199633160</u></td> <td style="padding: 5px;">Contact phone <u>7199633160</u></td> </tr> <tr> <td style="padding: 5px;">Contact email <u>rougeaux@gmail.com</u></td> <td style="padding: 5px;">Contact email <u>rougeaux@gmail.com</u></td> </tr> <tr> <td colspan="2" style="padding: 5px;">Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____</td> </tr> </table>	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	<u>Ron Rougeaux</u>	<u>261 Green Mountain Drive</u>	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name	<u>261 Green Mountain Drive palm desert, CA 92211-261</u>	palm desert, CA 92211	Contact phone <u>7199633160</u>	Contact phone <u>7199633160</u>	Contact email <u>rougeaux@gmail.com</u>	Contact email <u>rougeaux@gmail.com</u>	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)														
<u>Ron Rougeaux</u>	<u>261 Green Mountain Drive</u>														
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name														
<u>261 Green Mountain Drive palm desert, CA 92211-261</u>	palm desert, CA 92211														
Contact phone <u>7199633160</u>	Contact phone <u>7199633160</u>														
Contact email <u>rougeaux@gmail.com</u>	Contact email <u>rougeaux@gmail.com</u>														
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____															
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY														
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____														

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 1/26/2023  
 Mary A. Schott, Clerk

**Official Form 410  
 Proof of Claim**

04/22

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Jason Slater Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
<b>3. Where should notices and payments to the creditor be sent?</b>  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	Jason Slater Name 939 Belle Meade rd Bumpass, VA 23024	
	Contact phone 5408725995	Contact phone
	Contact email jaiebo@yahoo.com	Contact email
	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM/DD/YYYY	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	



# **EXHIBIT 2**

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

Attorneys for Province, LLC, solely in its capacity as  
the Liquidating Trustee of the Front Sight Creditors Trust

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

<p>In re:  Front Sight Management LLC,  Debtor.</p>	<p>Case No. 22-11824-abl  Chapter 11  <b>Hearing Date:</b> April 13, 2023 <b>Hearing Time:</b> 9:30 a.m.</p>
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**ORDER SUSTAINING TWELFTH OMNIBUS OBJECTION TO  
LATE-FILED PROOFS OF CLAIM**

On April 13, 2023 at 9:30 a.m., a hearing was held before the Honorable August Landis,  
Chief United States Bankruptcy Judge for the District of Nevada, for the Court to consider the  
*Twelfth Omnibus Objection to Late-Filed Proofs of Claim* [ECF No. \_\_\_\_] (the “Omnibus

1 Objection”)<sup>1</sup> filed by Province, LLC, solely in its capacity as the duly authorized and acting  
 2 Liquidating Trustee (the “Liquidating Trustee”)<sup>2</sup> of the Front Sight Creditors Trust (the “Liquidating  
 3 Trust”). Appearances were as duly noted on the record at the hearing.

4 The Court, having read and considered the Omnibus Objection and all evidence filed in  
 5 support of the Omnibus Objection; the Court having considered the argument and representations of  
 6 counsel at the hearing and other matters which the Court may properly take judicial notice,  
 7 including, without limitation, the record in this case as reflected on the docket; the Court having set  
 8 forth its findings and conclusions on the record pursuant to Rule 52 of the Federal Rules of Civil  
 9 Procedure and Rule 7052 of the Federal Rules of Bankruptcy Procedure; the Court having found that  
 10 notice of the Omnibus Objection was sufficient under the circumstances and no other or further  
 11 notice is required; the Court having determined that the legal and factual bases set forth in the  
 12 Omnibus Objection establish just cause for the relief sought therein; and after due deliberation and  
 13 sufficient cause appearing therefor,

14 **IT IS HEREBY ORDERED** that the Omnibus Objection is sustained in its entirety.

15 **IT IS HEREBY FURTHER ORDERED** that the following Proofs of Claim filed by the  
 16 following claimants (“Claimants”) shall be DISALLOWED in their entirety:

Claimant	Claim No.	Date Filed	Filed Claim Amount	Treatment
Dib, Fadi	1064-1	2/14/2023	\$2,765.00	Disallowed
Hale, Kenneth D.	1059-1	1/16/2023	\$20,000.00	Disallowed
Karnow, Robert F.	1060-1	1/19/2023	\$450.00	Disallowed
Lippmann, Robert M.	1065-1	2/15/2023	\$5,000.00	Disallowed
Rougeaux, Ron	1063-1	2/5/2023	\$37,000.00	Disallowed
Slater, Jason	1061-1	1/26/2023	\$198.00	Disallowed

22 **[Remainder of Page Intentionally Blank]**

26 <sup>1</sup> All initial capitalized terms not defined herein shall have the same meaning ascribed to them in the  
 Omnibus Objection.

27 <sup>2</sup> Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of  
 28 reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections  
 of general unsecured creditors in this case.

1           **IT IS HEREBY FURTHER ORDERED** that for any Claim disallowed pursuant to this  
2 Order, Claimant forever waives such Claim against the Debtor, its estate, the Liquidating Trustee  
3 and the Liquidating Trust.

4           **IT IS HEREBY FURTHER ORDERED** that any further claims filed or asserted by the  
5 Claimants, including any amendments, shall be deemed disallowed without further Court order.

6           **IT IS HEREBY FURTHER ORDERED** that pursuant to Civil Rule 54(b), made applicable  
7 in contested matters through Bankruptcy Rules 7054 and 9014, this Order shall be treated as a final  
8 judgment with respect to Claimants and their Claims.

9           **IT IS HEREBY FURTHER ORDERED** that the Court clerk is hereby directed to modify  
10 the claim register in this case consistent with this Order.

11           **IT IS SO ORDERED.**

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22 Prepared and Submitted By:

23 BG Law LLP

24 By: /s/ Susan K. Seflin  
25 Susan K. Seflin  
26 Jessica S. Wellington  
27 Attorneys for Province, LLC, solely in its capacity as  
28 the Liquidating Trustee of the Front Sight Creditors  
Trust