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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
 18 Front Sight Management LLC,
 19
 20 Debtor.

Case No. 22-11824-abl

Chapter 11

Hearing Date: April 13, 2023

Hearing Time: 9:30 a.m.

21 **DECLARATION OF AMANDA DEMBY SWIFT IN SUPPORT OF LIQUIDATING**
 22 **TRUSTEE’S MOTION FOR ENTRY OF AN ORDER EXTENDING**
 23 **THE CLAIM OBJECTION DEADLINE TO AUGUST 28, 2023**

24 I, Amanda Demby Swift, hereby declare as follows:

25 1. I am a principal of Province, LLC, the duly appointed liquidating trustee
 26 (“Liquidating Trustee”) for the Front Sight Creditors Trust (the “Trust”), and I am the individual
 27 charged with acting on the Liquidating Trustee’s behalf. In my capacity in serving on behalf of the
 28 Liquidating Trustee, I am responsible for overseeing and generally managing the Trust’s efforts to
 maximize the value of the estate for distributions to holders of allowed general unsecured claims.

1 2. Except as otherwise indicated, all statements herein are based on my personal
2 knowledge, my review of Front Sight Management LLC's (the "Debtor") books and records, and/or
3 my opinion based upon my experience and knowledge of the matters at issue. I am over 18 years of
4 age, and if called upon to testify, I could and would competently testify to each of the facts set forth
5 herein based on my personal knowledge, review of the documents, or opinion.

6 3. I make this declaration in support of the *Liquidating Trustee's Motion for Entry of an*
7 *Order Extending the Claim Objection Deadline to August 28, 2023* (the "Motion") filed concurrently
8 herewith. If called upon to testify, I could and would testify competently to the facts set forth in this
9 Declaration and the Motion. I am authorized to submit this Declaration on the Liquidating Trustee's
10 behalf. Any capitalized term not defined in this Declaration has the same meaning ascribed to it in
11 the Motion.

12 4. Pursuant to the Confirmation Order, the current deadline in this case for filing
13 objections to proofs of claim is February 28, 2023 (the "Objection Deadline"). However, the Plan
14 itself provided for a claim objection deadline that was 180 days after the Effective Date (or May 31,
15 2023). I.e., the Confirmation Order included an incorrect Objection Deadline for filing objections to
16 proofs of claim.

17 5. The Liquidating Trustee and its agents and professionals have made significant
18 progress in resolving the disputed general unsecured claims in this case. Approximately 1,065
19 proofs of claim have been filed against the Debtor and over 2,900 claims were scheduled by the
20 Debtor in its Schedule of Assets and Liabilities. The vast majority of the proof of claim were filed
21 by pre-petition members of the Debtor.

22 6. As of the filing of this Motion, the Liquidating Trustee has filed six omnibus claim
23 objections [ECF Nos. 691, 695, 700, 709, 711, and 713] since its appointment (and a total of thirteen
24 omnibus objections have been filed to date in this case). If all of the Liquidating Trustee's
25 objections are sustained, the claims asserted against the Debtor will be reduced by approximately
26 \$4.6 million.

27 7. Many of the Debtor's pre-petition members filed their claims based on the amount of
28 their member rewards, rather than the amount they paid to the Debtor. The Liquidating Trustee does

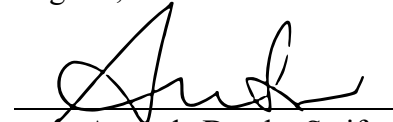
1 not object to the Debtor's pre-petition members having a claim against the Debtor for the amounts
2 they paid to the Debtor. However, reviewing the proofs of claim and comparing them to the
3 Debtor's records takes a significant amount of time.

4 8. While the Liquidating Trustee and its agents and professionals have made substantial
5 progress towards reconciling the claims filed against the Debtor, the Liquidating Trustee anticipates
6 filing more claim objections and thus requires additional time to complete the claim objection
7 process. An extension of the Objection Deadline will ensure a thorough analysis of each of the
8 claims in this case and will hopefully provide the Liquidating Trustee with sufficient time to resolve
9 all disputed claims.

10 9. I believe that a six (6) month extension of the Objection Deadline will likely provide
11 enough time for my team and I to resolve the outstanding claim objections, to prepare a final
12 distribution chart in this case and to make final distributions.

13 I declare under the penalty of perjury of the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed on this 23rd day of February, 2023 in Los Angeles, California.

16 
17 Amanda Demby Swift