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15  
16 **UNITED STATES BANKRUPTCY COURT**  
17 **DISTRICT OF NEVADA**

18 In re:	Case No. BK-S-22-11824-ABL
19 FRONT SIGHT MANAGEMENT, LLC	Chapter 11
20 Debtor.	
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22 **DECLARATION OF ANDREA M. CHAMPION, ESQ. IN SUPPORT OF MOTION FOR AN**  
23 **ORDER SHORTENING TIME TO HEAR LAS VEGAS DEVELOPMENT FUND, LLC’S**  
24 **MOTION LIMITED FOR PROTECTIVE ORDER**

24 I, Andrea M. Champion, Esq. declare as follows:

25 1. I am over eighteen (18) years of age and mentally competent.

26 1. I am an attorney duly licensed to practice law in the State of Nevada and am counsel  
27 for Las Vegas Development Fund, LLC (“LVDF”) and Robert W. Dziubla (“Dziubla”).  
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1           2.       I have personal knowledge of and am competent to testify to the fact contained in this  
2 Declaration. If called to do so, I would competently and truthfully testify to all matters set forth  
3 herein, except for those matters stated to be based upon information and belief.

4           2.       I make this declaration in support of the Motion for An Order Shortening Time to Hear  
5 Las Vegas Development Fund, LLC’s (“LVDF”) Motion for Limited Protective Order (the “Motion”).

6           3.       On February 17, 2023, I participated in a telephonic meet and confer call with Teresa  
7 Pilatowicz, counsel for Front Sight Management, LLC (“Front Sight”) regarding Front Sight’s proposed  
8 30(b)(6) topics for the deposition of LVDF. At the conclusion of that call, Ms. Pilatowicz and I agreed  
9 that if the parties could not resolve their dispute regarding the proposed 30(b)(6) topics, we would agree  
10 to a briefing schedule for any motion regarding the 30(b)(6) topics.

11           4.       Ms. Pilatowicz and I have since met and conferred and are unable to resolve all of the  
12 parties disputes.

13           5.       The parties have agreed that Robert Dziubla will be deposed as the 30(b)(6) designee on  
14 behalf of LVDF for those topics on which he is designated on March 31, 2023, provided that a ruling on  
15 the Motion is issued before..

16           6.       Accordingly, the parties also agreed that LVDF’s Motion should be filed with a request  
17 to hear the matter on shortened time, understanding that the Court is available for a hearing on the  
18 morning of March 24, 2023.

19           7.       The parties have agreed to the following briefing schedule:

- 20                   a.       LVDF will file its Motion contemporaneous with this request that the Motion be
- 21                               heard on shortened time on March 6, 2023;
- 22                   b.       Front Sight will file its opposition, if any, to the Motion by March 16, 2023;
- 23                   c.       LVDF will file its reply, if any, in support of the Motion by March 21, 2023.

24           8.       The parties have exchanged various drafts of a stipulation and order confirming the same  
25 but as of the filing of this Motion, have yet to finalize such a stipulation.

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9. Because the parties agree that the Motion needs to heard before the 30(b)(6) deposition of LVDF, and fact discovery closes in this matter on April 3, 2023, Affiant requests this Court to hear this matter on shortened time.

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

DATED this 6<sup>th</sup> day of March, 2023.

/s/ Andrea M. Champion, Esq.  
Andrea M. Champion, Esq.

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