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Honorable August B. Landis  
United States Bankruptcy Judge



Entered on Docket  
March 23, 2023

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*Attorneys for Reorganized Debtor  
Front Sight Management LLC*

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

In re:	Case No.: 22-11824-ABL Chapter 11
FRONT SIGHT MANAGEMENT LLC,  Reorganized Debtor.	Hearing Date: March 24, 2023 Hearing Time: 9:30 a.m.  Continued Hearing Date: April 7, 2023 Continued Hearing Time: 3:00 p.m.

**ORDER APPROVING STIPULATION TO ATTEND SETTLEMENT MEETING AND  
EXTEND DISCOVERY DEADLINES REGARDING LVDF CLAIM NO. 284  
AND REMAINING ADVERSARY CLAIMS**

The Court has considered the *Stipulation to Attend Settlement Meeting and Extend  
Discovery Deadlines Regarding LVDF Claim No. 284 and Remaining Adversary Claims* (the

1 “Stipulation”<sup>1</sup> between and among Reorganized Debtor Front Sight Management, LLC, a Nevada  
2 limited liability company (“Debtor” or “Front Sight,” as applicable), by and through its counsel,  
3 Garman Turner Gordon LLP, and Las Vegas Development Fund LLC, a Nevada limited liability  
4 company (“LVDF”), Robert Dziubla, Jon Fleming, Linda Stanwood, EB5 Impact Advisors LLC  
5 (“EB5IA”), and EB5 Impact Capital Regional Center (“EB5IC,” and collectively, the “LVDF  
6 Parties,” and together with Front Sight, the “Parties”), by and through their counsel, Jones  
7 Lovelock, and LVDF, by and through its counsel, the Law Office of Brian Shapiro, and good cause  
8 appearing therefor, and in light of the continued trial dates for this matter, hereby enters in this  
9 amended scheduling order:

10 **IT IS HEREBY ORDERED:**

- 11 1. The Parties shall attend a Settlement Meeting on March 29, 2023 commencing at  
12 9:00 a.m.;
- 13 2. Discovery is stayed pending the Settlement Meeting;
- 14 3. The hearing on the Motion shall be continued from March 24, 2023 at 9:30 a.m. to  
15 April 7, 2023 at 3:00 p.m.
- 16 4. The deadline for LVDF to file its reply in support of the Motion is continued from  
17 March 21, 2023 and April 4, 2023;
- 18 5. The Discovery deadlines are extended as follows:
  - 19 a. All fact discovery will be completed by **May 15, 2023**.
  - 20 b. If necessary, the Parties shall meet and confer as soon as practical after the  
21 Settlement Meeting to reschedule the Depositions at mutually agreeable dates and times prior to  
22 May 15, 2023.
  - 23 c. If necessary, the Parties shall meet and confer as soon as practical after the  
24 Settlement Meeting to confirm when supplemental responses to the Written Discovery will be  
25 provided.
  - 26 d. Initial expert reports shall be exchanged on or before **April 14, 2023**.

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28 <sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

1 Rebuttal expert reports will be due thirty (30) calendar days after the initial expert report disclosure  
2 deadline (*i.e.*, on or before May 15, 2023). All expert depositions shall be completed by **June 15,**  
3 **2023.**

4 e. All potential dispositive motions should be filed on or before **May 22, 2023,**  
5 with oppositions due on or before **June 12, 2023,** and replies due on or before **June 26, 2023.**

6 f. Final lists of witnesses and exhibits shall be filed and exchanged on or  
7 before **June 12, 2023.**

8 g. Parties shall file objections to final witness and exhibit lists on or before  
9 **June 26, 2023.**

10 h. Motions *in limine* shall be filed no later than **June 12, 2023.**

11 i. Responses to motions *in limine* shall be filed no later than **June 26, 2023.**

12 Respectfully submitted:

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14 GARMAN TURNER GORDON LLP

JONES LOVELOCK PLLC

15  
16 By: /s/ Teresa M. Pilatowicz  
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