	Case 22-11824-abl Doc 791 Entered 03/31/23 08:53:11 Page 1 of 4				
1	STEVEN T. GUBNER – NV Bar No. 4624 SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted <i>Pro Hac Vice</i> JESSICA S. WELLINGTON – CA Bar No. 324477 – Admitted <i>Pro Hac Vice</i>				
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7 8	Attorneys for Province, LLC, solely in its capacity as the Liquidating Trustee of the Front Sight Creditors Trust				
9		BANKRUPTCY COURT			
10	FOR THE DIST	<b>TRICT OF NEVADA</b>			
11	In re:	Case No. 22-11824-abl			
12					
13	Front Sight Management LLC, Chapter 11				
14	Debtor. Hearing Date: April 13, 2023				
15	Hearing Time: 9:30 a.m.				
16					
17	STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT				
18	<b>RELATES TO CLAIMS 992 AND 1001 FILED BY VINCENT MAYER</b>				
19	Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee				
20	(the "Liquidating Trustee") of the Front Sight Creditors Trust, on the one hand, and claimant				
21	Vincent Mayer ("Claimant"), on the other hand, hereby enter into this stipulation (the "Stipulation")				
22	with regard to the following facts:				
23	RE	CITALS			
24	A. On May 24, 2022, Front Sight M	anagement LLC (the "Debtor") filed a voluntary			
25	petition for relief under chapter 11 of the Bankruptcy Code, commencing this bankruptcy case.				
26					
27	amount of a \$13,741.60 general unsecured claim. On December 22, 2022, Claimant filed Proof of				
28					

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1	Claim 1001-1 ("Claim 1001") in the amount of a \$13,741.60 general unsecured claim and also			
2	named Lisa Mayer as a claimant (though only Claimant signed Claim 1001).			
3	C. On February 16, 2023, the Liquidating Trustee filed its eighth omnibus objection to			
4	claim [ECF No. 691] (the "8 <sup>th</sup> Omnibus Objection") pursuant to which the Liquidating Trustee			
5	objected to both claims, sought to disallow Claim 992 in its entirety and sought to disallow Claim			
6	1001 to the extent it exceeds \$1,345.			
7	D. On or around February 23, 2023, Claimant contacted counsel for the Liquidating			
8	Trustee and provided additional evidence in support of his claim.			
9	E. After good faith discussions between the parties, the Liquidating Trustee has agreed			
10	to allow Claim 992 in the amount of a \$12,289.60 general unsecured claim, with Claim 1001			
11	disallowed in its entirety.			
12	<b>STIPULATION</b>			
13	WHEREFORE, the parties hereby agree and stipulate, subject to Court approval, as follows:			
14	1. The foregoing recitals are incorporated herein in full by this reference.			
15	2. Claim 992 shall be allowed as a general unsecured claim in the amount of \$12,289.60			
16	(the "Allowed Claim"), and disallowed to the extent that it asserts any amount over \$12,289.60.			
17	3. Claim 1001 shall be disallowed in its entirety.			
18	4. Except for the Allowed Claim and the right to enforce this Stipulation and the order			
19	approving this Stipulation, Claimant shall have no additional claim(s) against the Debtor, its estate,			
20	the Liquidating Trust or the Liquidating Trustee arising from or relating to the facts alleged in Claim			
21	992 or Claim 1001.			
22	5. To the extent that the 8 <sup>th</sup> Omnibus Objection relates to Claim 992 or Claim 1001, it is			
23	resolved pursuant to this Stipulation.			
24	6. Upon entry of the order approving this Stipulation, the Court clerk shall be directed to			
25	modify and update the claim register in this case to reflect an allowed amount of a \$12,289.60			
26	general unsecured claim for Claim 992, and to reflect that Claim 1001 is disallowed in its entirety.			
27				
28				

1	7.	The parties agree that signatures transmitted electronically, including, for example, by
2	email or facsim	nile, shall be original signatures for all purposes, and that multiple signed versions of
3	the Stipulation	shall constitute one and the same instrument.

4 8. The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce
5 this Stipulation and the order approving it.

	THE	FOR	EGO	ING	IS	AGRE	ED:
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8	DATED:	March 31, 2023	
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DATED: March 30, 2023

BG Law LLP

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

By:

Vincent Mayer, Claimant

<ul> <li>ncica.com</li> <li>CHAPTER 11 - LV USTPRegion 17.1v.ecf@usdoj.gov</li> <li>DAWN M. CICA dcica@earlyoncica.com, nrodriguez@earlyoncica.com;contextson@earlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen @carlyoncica.com;3342887420@filings.docketbird.com</li> <li>WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com</li> <li>THOMAS H. FELL tfell@fennemorelaw.com, clandis@fennemorelaw.com, STEVEN T GUBNER sgubner@bg.law, ccf@bg.law</li> <li>RAMIR M. HERNANDEZ rhemandez@wrightlegal.net, jcraig@wrightlegal.net;nvbkfiling@wrightlegal.net</li> <li>MICHAEL R. HOGUE hoguem@gtlaw.com, LVLiDock@GTLAW com;flintz@gtlaw.com, asSON B KOMORSKY jkomorsky@bg.law</li> <li>BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com</li> <li>NICOLE E. LOVELOCK nlovelock@joneslovelock.com, januskevicius@joneslovelock.com</li> <li>EDWARD M. MCDONALD edward.m.mcdonal@usdoj.gov</li> <li>DAVID MINCIN dmincin@mincinlaw.com, cburk@mincinlaw.com</li> <li>TRACY M. O'STEEN tosteen@earlyoncica.com; crobertson@earlyoncica.com;modriguez@earlyoncica.com; cef@nvfirm.com;senwartz#35599@notify.bestcase.com;eanderson@nvfirm.com; sUSAN K. SEFLIN sseflim@bg.law</li> <li>BRIAN D. SHAPIRO brian@prianshapirolaw.com, kshapiro@brianshapirolaw.com;655036420@filings.docketbird.com</li> <li>STEVEN T. USTPRegion17.1v.ecf@usdoj.gov</li> <li>BRIAN D. SHAPIRO brian@prianshapirolaw.com, cef@nvfirm.com;schwartz#35599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com</li> <li>SUSAN K. SEFLIN sseflim@bj.law</li> <li>BRIAN D. SHAPIRO brian@prianshapirolaw.com, kshapiro@brianshapirolaw.com;655036420@filings.docketbird.com</li> <li>STRUSTEE - LV-11 USTPRegion17.1v.ecf@usdoj.gov</li> <li>JESSICA S. WELLINGTON jwellington@bg.law</li> <li>MICHAEL A-Mail: Vincent Mayer – vmayer45@yahoo.com</li> <li>Ideclare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I</li></ul>		Case 22-11824-abl Doc 791 Entered 03/31/23 08:53:11 Page 4 of 4
1       Ideclare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.         3       On March 31, 2023, I served the following document:         4       STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT RELATES TO CLAIMS 992 AND 1001 FILED BY VINCENT MAYER         5       Those designated "[NEF]" on the Court docket were served with the Notice by the Court via         6       Electronic Mail, as follows:         7       .       JASON BLUMBERG Jasonbiumberg@usdoj.gov         8       .       CANDACE CCARLYON cert/son@earlyoncica.com, CRobertson@earlyoncica.com, and dica@earlyoncica.com, and dica@earlyoncica.com, and dica@earlyoncica.com, 3342887420@filings.docketbird.com, 22773@notify.bestcase.com         10       .       DITPREgion171v.vecf@usdoj.gov         12       .       CHAPTER 11 - LV       USTPRegion171v.vecf@usdoj.gov         13       .       DIAWN M. CICA       dica@earlyoncica.com, and motica@gmail.com, dica@earlyoncica.com         14       .       RAMIR M. HERNANDEZ       hemandez@uscinc.com/uscinca.com         14       .       RAMIR M. HERNANDEZ       hemandez@uscinc.com/uscinca.com         14       .       RAMIR M. HERNANDEZ       hemandez@uscincumcodus.com         14       .       RAMIR M. HERNANDEZ       hemandez@uscincumc	1	CERTIFICATE OF SERVICE
3       Woodland Hills, California 91367.         4       On March 31, 2023, I served the following document:         5       STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT         6       RELATES TO CLAIMS 992 AND 1001 FILED BY VINCENT MAYER         7       Those designated "INEF]" on the Court docket were served with the Notice by the Court via         6       Electronic Mail, as follows:         7       (1) The Court's CM/ECF List:         8       CANDACT C CARLYON cearlyon@carlyoncica.com,         9       ncica.com         9       CANDACT C CARLYON cearlyon@carlyoncica.com,         9       CANDACT C CARLYON cearlyon@carlyoncica.com,         9       CANDACT C CARLYON cearlyon@carlyoncica.com,         9       CHAPTER II -LV       USTPRegion17.1v.ec@usdoj.gvv         9       DAWN M. CLCA dcica@carlyoncica.com,         9       recarvoncica.com:3428874204[filings.docketbird.com         10       WILLIAM C DEVINE         11       WILLIAM C DEVINE         12       THOMAS H, FELL If file@fennemorelaw.com         13       PHILIP S GERSON Philp@genem@glaw.com.acom.acom.acom.acom.acom.acom.acom         14       RAMIR M. HERNANDEZ         15       IVLIDeK@GTLAW.com; filtra@@flaw.com.acom.acom.acarrom@glaw.com         16       BART K.LARSEN & MLA		
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CRobertson@earlyoncica.com;rodriguez@earlyoncica.com;9232006420@filings.docketbird.com;Dcica@earlyoncica.com;rodriguez@earlyoncica.com; [januskevicius@joneslovelock.com]         13       CHAPTER       NECONALD       edward@unicinalw.com       StaSON BKOMORSKY       joon;foon;foor;foor;foor;foor;foor;foor;f		
<ul> <li>CHAPTER 11-LV USTPRegion 17.1v.ecf@usdoj.gov</li> <li>DAWN M. CICA dcica@carlyoncica.com, mordiguez@carlyoncica.com;comertoenso@carlyoncica.com;dmcica@gmail.com;dcica@carlyoncica.com;tosteen @carlyoncica.com;3342887420@filings.docketbird.com</li> <li>WILLIAM C DEVINE william@devine.legal, courtney@devine.legal;devinewr72773@notify.bestcase.com</li> <li>THOMAS H. FELL tfell@tennemorelaw.com, clandis@fennemorelaw.com;CourtFilings@fennemorelaw.com</li> <li>PHILIP S. GERSON Philip@gersonvlaw.com</li> <li>STEVEN T GUBNER sgubner@bg.law, ccf@bg.law</li> <li>RAMIR M. HERNANDEZ thernandez@wrightlegal.net, joraig@wrightlegal.net;nvbkfiling@wrightlegal.net</li> <li>MICHAEL R. HOGUE hoguem@gtlaw.com; JASON B KOMORSKY jkomorsky@bg.law</li> <li>BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com</li> <li>JASON B KOMORSKY jkomorsky@bg.law</li> <li>BART K. LARSEN BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com</li> <li>NICOLE E. LOVELOCK nlovelock@joneslovelock.com, ljanuskevicius@joneslovelock.com</li> <li>EDWARD M. MCDONALD edward.m.mcdonald@usdoj.gov</li> <li>DAVID MINCIN dminein@mineinlaw.com; oburke@mineinlaw.com</li> <li>TRACY M. O'STEEN tosteen@carlyoncica.com;ccarlyon@carlyoncica.com</li> <li>TERESA M. PILATOWICZ tpilatovicz@gtg.legal, bknotices@gtg.legal</li> <li>SAMUEL A. SCHWARTZ saschwartZ@urfim.com; ecf@nvfirm.com;schwartzsr45599@notify.bestcase.com;eanderson@nvfirm.com;samid@nvfirm.com</li> <li>SUSAN K. SEFLIN sseflin@bj.law</li> <li>BRIAN D. SHAPIRO brian@brianshapirolaw.com; u.S. TRUSTEE - LV - 11 USTPRegion17.1v.ecf@usdoj.gov</li> <li>JESICA S. WELLINGTON jwellington@bj.law, ecf@bg.law</li> <li>Q) VIA E-Maili</li> <li>Vincent Mayer – vmayer45@yahoo.com</li> <li>Ideclare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United State: of America and the State of California that</li></ul>	_	CRoberts on @ carlyoncica.com; nrodriguez @ carlyoncica.com; 9232006420 @ filings.docketbird.com; Dcica @ carlyoncica.com; 0.232006420 @ filings.docketbird.com; 0.2320006420 @ filings.docketbird.com; 0.2320006420 @ filings.docketbird.com; 0.2320000000000000000000000000000000000
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27 Executed <b>March 31, 2023</b> , at Woodland Hills, California.	27	Executed March 31, 2023, at Woodland Hills, California.
28 /s/ Jessica Studley JESSICA STUDLEY	28	/s/ Jessica Studley JESSICA STUDLEY