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7 Attorneys for Province, LLC, solely in its capacity as
 the Liquidating Trustee of the Front Sight Creditors Trust
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9 **UNITED STATES BANKRUPTCY COURT**
 10 **FOR THE DISTRICT OF NEVADA**

<p>11 In re:</p> <p>12 Front Sight Management LLC,</p> <p>13</p> <p>14 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: April 13, 2023 Hearing Time: 9:30 a.m.</p>
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18 **STIPULATION RESOLVING NINTH OMNIBUS OBJECTION AS IT**
 19 **RELATES TO CLAIM 338-1 FILED BY MATTHEW LEE BALDWIN**

20 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee
 21 (the “Liquidating Trustee”) of the Front Sight Creditors Trust (the “Liquidating Trust”), on the one
 22 hand, and claimant Matthew Lee Baldwin (“Claimant”), on the other hand, hereby enter into this
 23 stipulation (the “Stipulation”) with regard to the following facts:

24 **RECITALS**

25 A. On May 24, 2022, Front Sight Management LLC (the “Debtor”) filed a voluntary
 26 petition for relief under chapter 11 of the Bankruptcy Code, commencing this bankruptcy case.

27 B. On October 5, 2022, Claimant filed Proof of Claim 338-1 (“Claim 338”) in the
 28 amount of a \$2,000.00 general unsecured claim.

1 C. On February 16, 2023, the Liquidating Trustee filed its ninth omnibus objection to
2 claim [ECF No. 695] (the “9th Omnibus Objection”) pursuant to which the Liquidating Trustee
3 objected to Claim 338 and sought to disallow the claim in its entirety.

4 D. On or around March 3, 2023, Claimant contacted counsel for the Liquidating Trustee
5 and provided additional evidence in support of his claim.

6 E. After good faith discussions between the parties, the Liquidating Trustee has agreed
7 to allow Claim 338 in the amount of a \$299.00 general unsecured claim.

8 **STIPULATION**

9 **WHEREFORE**, the parties hereby agree and stipulate, subject to Court approval, as follows:

10 1. The foregoing recitals are incorporated herein in full by this reference.

11 2. Claim 338 shall be allowed as a general unsecured claim in the amount of \$299.00
12 (the “Allowed Claim”) and disallowed to the extent that it asserts an amount over \$299.00.

13 3. Except for the Allowed Claim and the right to enforce this Stipulation and the order
14 approving this Stipulation, Claimant shall have no additional claim(s) against the Debtor, its estate,
15 the Liquidating Trust or the Liquidating Trustee arising from or relating to the facts alleged in Claim
16 338.

17 4. To the extent that the 9th Omnibus Objection relates to Claim 338, it is resolved
18 pursuant to this Stipulation.

19 5. Upon entry of the order approving this Stipulation, the Court clerk shall be directed to
20 modify and update the claim register in this case to reflect an allowed amount of a \$299.00 general
21 unsecured claim for Claim 338.

22 6. The parties agree that signatures transmitted electronically, including, for example, by
23 email or facsimile, shall be original signatures for all purposes, and that multiple signed versions of
24 the Stipulation shall constitute one and the same instrument.

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1 7. The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce
2 this Stipulation and the order approving it.

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4 **THE FOREGOING IS AGREED:**

5 DATED: April 4, 2023

BG Law LLP


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7 By: /s/ Jessica S. Wellington

Susan K. Seflin

Jessica S. Wellington

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

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12 DATED: April 4, 2023

13
14 By:  _____

Matthew Lee Baldwin, Claimant

CERTIFICATE OF SERVICE

I declare 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.

On April 4, 2023, I served the following document:

STIPULATION RESOLVING NINTH OMNIBUS OBJECTION AS IT RELATES TO CLAIM 338-1 FILED BY MATTHEW LEE BALDWIN

Those designated "[NEF]" on the Court docket were served with the Notice by the Court via Electronic Mail, as follows:

(1) The Court's CM/ECF List:

- JASON BLUMBERG Jason.blumberg@usdoj.gov
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- JESSICA S. WELLINGTON jwellington@bg.law, ecf@bg.law

(2) VIA E-Mail:

Matthew Baldwin - Matthew@vargasgonzalez.com

I declare 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 States of America and the State of California that the foregoing is true and correct.

Executed April 4, 2023, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY