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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:** August 21, 2023

**Hearing Time:** 9:30 a.m.

21 **FOURTEENTH OMNIBUS OBJECTION TO LATE-FILED PROOFS OF CLAIM**

22 **\*\*IF YOU ARE RECEIVING THIS OMNIBUS OBJECTION IN THE MAIL THEN IT APPLIES**  
 23 **TO YOU AND YOU SHOULD READ THIS DOCUMENT IN FULL\*\***

24 Province, LLC, solely in its capacity as the duly authorized and acting Liquidating Trustee  
 25 (the “Liquidating Trustee”)<sup>1</sup> of the Front Sight Creditors Trust (the “Trust”), hereby submits this

26  
 27 <sup>1</sup> Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of  
 28 reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections  
 in this case except for those relating to Las Vegas Development Fund, LLC and Michael Meacher.

1 fourteenth omnibus objection (“Omnibus Objection”) pursuant to Section<sup>2</sup> 502 and Bankruptcy Rule  
 2 3007, to the proofs of claim identified herein. After careful review, the Liquidating Trustee has  
 3 determined that the proofs of claim listed in the chart below (each a “Late-Filed Claim” and  
 4 collectively, the “Late-Filed Claims”) filed by the respective claimants (collectively, the “Claimants”  
 5 and each a “Claimant”)<sup>3</sup> were filed after January 3, 2023.

Claimant	Claim No.	Date Filed	Claim Amount
Bennett, Richard Dee	1066-1	02/24/2023	\$33,370.00
Compomizzo, David	1067-1	03/02/2023	\$22,000.00
McAvoy, Kathryn L.	1072-1	05/08/2023	\$0.00
McAvoy, Richard J.	1073-1	05/09/2023	\$5,000.00
Miller, Gary	1069-1	03/13/2023	\$138.00
Scruggs, William M.	1068-1	03/04/2023 <sup>4</sup>	\$3,767.10

11  
 12 The Liquidating Trustee seeks an order disallowing the Late-Filed Claims in the above-  
 13 captioned bankruptcy case. Accordingly, the Liquidating Trustee objects to the Late-Filed Claims  
 14 and respectfully requests entry of an order substantially in the form attached hereto as **Exhibit 2**  
 15 sustaining this Omnibus Objection and disallowing and expunging the Late-Filed Claims in their  
 16 entirety pursuant to Section 502(b) and Bankruptcy Rules 3003 and 3007.<sup>5</sup>

17 **CLAIMANTS RECEIVING THIS OMNIBUS OBJECTION SHOULD LOCATE**  
 18 **THEIR NAMES AND CLAIMS ON PAGES 2 AND 5.**

19 This Omnibus Objection is made and based upon the following Memorandum of Points and  
 20 Authorities, the declaration of Amanda Demby Swift (the “Swift Decl.”) filed in support of the  
 21 Omnibus Objection, the papers, pleadings, and other documents on file with the clerk of the Court,  
 22 and judicial notice of which is respectfully requested pursuant to Federal Rule of Evidence 201, and  
 23 such other and further evidence as may be provided at the hearing on the Omnibus Objection.

24  
 25 <sup>2</sup> References to “Section” refer to the Bankruptcy Code (11 U.S.C. §§ 101 et seq.); references to  
 “Bankruptcy Rule” refer to the Federal Rules of Bankruptcy Procedure; and references to “Local  
 Rule” refer to the Local Bankruptcy Rules.

26 <sup>3</sup> As required by Local Rule 3007(a)(4), the first page of each of the Proofs of Claim are attached  
 27 hereto as **Exhibit 1**.

28 <sup>4</sup> The proof of claim was received by Stretto on February 16, 2023.

<sup>5</sup> The Liquidating Trustee expressly reserves the right to object to the Late-Filed Claims on any other  
 grounds that bankruptcy or non-bankruptcy law permits.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and Local Rule 1001(b)(1).

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

4. The statutory predicates for the relief sought herein are Section 11 U.S.C. §§ 105 and 502, Bankruptcy Rule 3007, and Local Rule 3007.

5. As required by Local Rule 9014.2, the Liquidating Trustee consents to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

**II. STATEMENT OF FACTS**

6. On May 24, 2022, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On June 9, 2022, United States Trustee for Region 17 filed its *Amended Appointment of the Official Committee of Unsecured Creditors* [ECF No. 116].

7. On November 29, 2022, the order confirming the Debtor’s second amended chapter 11 plan of reorganization was entered [ECF No. 556] (the “Conformation Order”) pursuant to which the “Reorganized Debtor” has new ownership and membership on the “effective date” of the plan. The “effective date” of the plan was December 2, 2022 [ECF No. 584].

8. Pursuant to the Confirmation Order, the Trust was created to, among other things, oversee and administer general unsecured claims, objections thereto, and ultimately distributions on allowed claims. Accordingly, the Liquidating Trustee is the party in interest as to this Omnibus Objection.

9. On December 5, 2022, the Reorganized Debtor filed a *Notice of: (I) Effective Date of Debtor’s Plan of Reorganization; (II) Administrative Claim Bar Date; (III) Professional Compensation Bar Date; (IV) Claims Objection Deadline; and (V) Bar Date for Claims Arising from Rejection of Memberships* [ECF No. 584] (the “Membership Bar Date Notice”).

10. Pursuant to the Membership Bar Date Notice, the deadline for members to file proof of claims for claims arising out of rejection of their memberships was January 3, 2023.

### III. RELIEF REQUESTED

11. The Liquidating Trustee has reviewed the Claims Register and the proofs of claim filed in this case and has determined that each of the Late-Filed Claims were filed by a former member of the Debtor and the claims arise out of rejection of the Claimants' memberships. Each of the Late-Filed Claims were filed after January 3, 2023, as summarized in the following table:

Claimant	Claim No.	Date Filed	Claim Amount
Bennett, Richard Dee	1066-1	02/24/2023	\$33,370.00
Compomizzo, David	1067-1	03/02/2023	\$22,000.00
McAvoy, Kathryn L.	1072-1	05/08/2023	\$0.00
McAvoy, Richard J.	1073-1	05/09/2023	\$5,000.00
Miller, Gary	1069-1	03/13/2023	\$138.00
Scruggs, William M.	1068-1	03/04/2023 <sup>6</sup>	\$3,767.10

12. The Liquidating Trustee objects to the Late-Filed Claims and seeks an order disallowing and expunging the Late-Filed Claims in their entirety pursuant to Section 502(b) and Bankruptcy Rules 3003 and 3007.

### IV. BASIS FOR RELIEF

#### A. Standard for Disallowance of Proofs of Claims

13. Bankruptcy Rule 3001(f) provides that a "proof of claim executed and filed in accordance with these rules shall constitute prima facie evidence of the validity and amount of the claim." It is well established in the Ninth Circuit that the initial burden of persuasion for establishing the validity and amount of a proof of claim is upon the claimant. *Ashford v. Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*, 178 B.R. 222 (9th Cir. BAP 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996) (a proof of claim must have a writing attached and include supporting documentation to qualify for presumptive validity). However, the prima facie validity of a claim does not attach unless the claim sets forth the facts necessary to support the claim. *Id.* at 226.

<sup>6</sup> The proof of claim was received by Stretto on February 16, 2023.

1           14.       Section 502 authorizes a “party in interest,” such as the Liquidating Trustee, to object  
2 to claims. 11 U.S.C. § 502(a). Once the objector raises “facts tending to defeat the claim by  
3 probative force equal to that of the allegations of the proofs of claim themselves,” then the burden  
4 reverts to the claimant to prove the validity of the claim by a preponderance of evidence. *Wright v.*  
5 *Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991); *In re Consolidated Pioneer Mortgage*, 178  
6 B.R. at 226. Indeed, the ultimate burden of persuasion is always on the claimant. *In re Holm*, 931  
7 F.2d at 623; *see also In re Heath*, 331 B.R. 424 (9th Cir. BAP 2005) (explaining that a claim that  
8 fails to attach supporting documentation is not entitled to be considered as prima facie evidence of  
9 validity and amount of claim).

10           15.       Section 502(b)(1) requires disallowance of a claim if “such claim is unenforceable  
11 against the debtor and property of the debtor, under any agreement or applicable law for a reason  
12 other than because such claim is contingent or unmatured. . .” 11 U.S.C. § 502(b)(1). The  
13 “applicable law” referenced in Section 502(b)(1) includes bankruptcy law as well as other federal  
14 and state laws. *See Cavaliere v. Sapir*, 208 B.R. 784, 786-787 (D. Conn. 1997) (providing that  
15 “applicable law” includes bankruptcy law). A debtor is therefore allowed to raise any federal or  
16 state law defenses to a claim. *See In re G.I. Industries, Inc.*, 204 F.3d 1276, 1281 (9th Cir. 2000)  
17 (stating that a claim cannot be allowed under Section 502(b)(1) if it is unenforceable under  
18 nonbankruptcy law); *Johnson v. Righetti*, 756 F.2d 738, 741 (9th Cir. 1985) (finding that the validity  
19 of the claim may be determined under state law); *In re Eastview Estates II*, 713 F.2d 443, 447 (9th  
20 Cir. 1983) (applying California law).

21           **B.       The Late-Filed Claims Should Be Disallowed**

22           16.       Section 502(b)(9) provides, in relevant part, that if an “objection to claim is made, the  
23 court, after notice and a hearing, shall determine the amount of such claim . . . and shall allow such  
24 claim in such amount, except to the extent that . . . proof of such claim is not timely filed.” 11  
25 U.S.C. § 502(b)(9).

26           17.       As set forth above, each of the Claimants is a former member of the Debtor and each  
27 of the Late-Filed Claims arise out of the rejection of the Claimants’ memberships. Pursuant to the  
28

1 Membership Bar Date Notice, Claimants were required to file such claims by January 3, 2023. The  
2 Late-Filed Claims were filed after that date.

3 18. Accordingly, the Liquidating Trustee requests that the Late-Filed Claims be  
4 disallowed under Section 502(b)(9), and that the disallowance be applicable and binding for all  
5 purposes.

6 **C. The Standards Governing Omnibus Objections to Claims Have Been Met**

7 19. Bankruptcy Rule 3007(d)(4) and (e) govern omnibus objections to late filed proofs of  
8 claim. Bankruptcy Rule 3007(d)(4) specifically allows for omnibus objections to claims if “they  
9 were not timely filed.” Fed. R. Bankr. P. 3007(d)(4). The requirements for omnibus objections are  
10 contained in Bankruptcy Rule 3007(e), which provides that such objections shall:

- 11 (1) state in a conspicuous place that claimants receiving the  
12 objection should locate their names and claims in the objection; (2)  
13 list claimants alphabetically, provide a cross-reference to claim  
14 numbers, and, if appropriate, list claimants by category of claims;  
15 (3) state the grounds of the objection to each claim and provide a  
16 cross-reference to the pages in the omnibus objection pertinent to  
17 the stated grounds; (4) state in the title the identity of the objector  
18 and the grounds for the objections; (5) be numbered consecutively  
19 with other omnibus objections filed by the same objector; and (6)  
20 contain objections to no more than 100 claims.

21 Fed. R. Bankr. P. 3007(e).

22 20. This Omnibus Objection falls within the grounds set forth in Bankruptcy Rule  
23 3007(d)(1). Furthermore, each of the requirements set forth in Bankruptcy Rule 3007(e) have been  
24 complied with or will be complied with upon the filing of this Omnibus Objection. Therefore, this  
25 Omnibus Objection should be sustained.

26 **V. RESERVATION OF RIGHTS**

27 21. The Liquidating Trustee specifically reserves the right to amend this Omnibus  
28 Objection, file additional papers in support of this Omnibus Objection or take other appropriate  
actions, including, *inter alia*, to: (a) respond to any allegation or defense that may be raised in a  
response filed by or on behalf of any of the Claimants or other interested parties; (b) object further to  
any claim for which a Claimant provides (or attempts to provide) additional documentation or  
substantiation; and (c) object further to any of the claims addressed herein based on additional

1 information that may be discovered upon further review by the Liquidating Trustee or through  
2 discovery pursuant to the Bankruptcy Rules.

3 **VI. SEPARATE CONTESTED MATTERS**

4 22. Each of the claims and the Liquidating Trustee's objections thereto constitute a  
5 separate contested matter as contemplated by Bankruptcy Rules 3007 and 9014 and Local Rule  
6 3007. The Liquidating Trustee requests that any order entered by the Court with respect to a  
7 particular claim objected to in this Omnibus Objection be deemed a separate order with respect to  
8 each claim in accordance with Bankruptcy Rule 3007(1).

9 **VII. NOTICE**

10 23. The Liquidating Trustee will serve copies of this Omnibus Objection upon each of the  
11 Claimants identified in the chart contained herein at the addresses listed on the Late-Filed Claims, as  
12 filed.

13 **VIII. CONCLUSION**

14 For the foregoing reasons, the Liquidating Trustee respectfully requests that the Court enter  
15 an order substantially in the form attached hereto as **Exhibit 2**:

16 A. Sustaining the Omnibus Objection, and disallowing the Late-Filed Claims;

17 B. Providing that each of the Late-Filed Claims shall be expunged from the official claims  
18 register in the Debtor's bankruptcy case;

19 C. Providing that for any Late-Filed Claim disallowed pursuant to this Omnibus Objection,  
20 the Claimant forever waives such claim against the Trust, the Liquidating Trustee, the Debtor and its  
21 estate;

22 D. Providing that if any Claimant files or asserts any new claim, or an amendment of any  
23 other proof of claim, related to any of the Late-Filed Claims resolved by this Omnibus Objection,  
24 then such amendment shall be deemed disallowed with prejudice and automatically expunged from  
25 the claims register in the Debtor's case, without further order of this Court;

26 E. Providing that, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, made  
27 applicable in contested matters through Bankruptcy Rules 7054 and 9014, any such ruling on the  
28 Omnibus Objection shall be treated as a final judgment with respect to the Claimants and their

1 claims subject to such ruling, and determining that there is no just reason for delay in entry of a final  
2 judgment on the claims resolved herein; and

3 F. Granting such other and further relief as the Court deems just and proper.

4 DATED: July 21, 2023

BG Law LLP

5  
6 By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

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

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Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 2/24/2023  
 Mary A. Schott, Clerk

**Official Form 410  
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Richard Dee Bennett	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
<b>3. Where should notices and payments to the creditor be sent?</b>  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	Richard Dee Bennett	152 S 350 E
	Name	Name
	11964 S 700 W Draper, UT 84020-9435	Farmington, UT 84025
	Contact phone 8015801868	Contact phone 801-390-0025
	Contact email austinjaybennett@gmail.com	Contact email dqbennett2@msn.com
	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known)	
		Filed on MM/DD/YYYY
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 3/2/2023  
 Mary A. Schott, Clerk

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 Proof of Claim**

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	David Compomizzo	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
<b>3. Where should notices and payments to the creditor be sent?</b>  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	David Compomizzo	
	Name	Name
	3722 Fair Oaks Court Redding, CA 96001	
	Contact phone	Contact phone
	Contact email	Contact email
	Uniform claim identifier for electronic payments in chapter 13 (if you use one):	
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ <span style="float: right;">MM / DD / YYYY</span>	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 5/8/2023  
 Mary A. Schott, Clerk

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 Proof of Claim**

04/22

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Kathryn L. McAvoy	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	Kathy McAvoy, Dr. Kathryn L. McAvoy, Ph.D.
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
<b>3. Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	Kathryn L. McAvoy	_____
	Name	Name
	8090 North Payne Road Indianapolis, IN 46268-1923	
	Contact phone 317-228-2391	Contact phone _____
Contact email Win95gal@iquest.net	Contact email _____	
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ <span style="float: right;">MM / DD / YYYY</span>	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 5/9/2023  
 Mary A. Schott, Clerk

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A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Richard J. McAvoy Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
<b>3. Where should notices and payments to the creditor be sent?</b>  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	Richard J. McAvoy Name	_____ Name
	8090 N. Payne Rd. Indianapolis, IN 46268-1923	
	Contact phone 317-228-2391	Contact phone _____
	Contact email Win95gal@outlook.com	Contact email _____
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ <span style="float: right;">MM / DD / YYYY</span>	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Fill in this information to identify the case:	
Debtor 1	FRONT SIGHT MANAGEMENT LLC
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court	District of Nevada
Case number:	22-11824

FILED  
 U.S. Bankruptcy Court  
 District of Nevada  
 3/13/2023  
 Mary A. Schott, Clerk

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 Proof of Claim**

04/22

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Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Gary Miller _____ Name of the current creditor (the person or entity to be paid for this claim)  Other names the creditor used with the debtor _____	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
<b>3. Where should notices and payments to the creditor be sent?</b>  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	Gary Miller _____	_____
	Name	Name
	PO Box 1171 Pasco, WA 99301	
	Contact phone <u>5095211876</u>	Contact phone _____
Contact email <u>gmiller3@charter.net</u>	Contact email _____	
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ <span style="float: right;">MM / DD / YYYY</span>	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Fill in this information to identify the case:**

Debtor 1 Front Sight Management LLC

Debtor 2 WILLIAM M SCRUGGS  
(Spouse, if filing)

United States Bankruptcy Court for the: District of Nevada

Case number 22-11824-abl

Official Form 410

**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor? WILLIAM M SCRUGGS  
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

<p><b>Where should notices to the creditor be sent?</b></p> <p><u>WILLIAM M SCRUGGS</u> Name</p> <p><u>8 MORRIS LANE</u> Number Street</p> <p><u>EAST LYME CT 06333</u> City State ZIP Code</p> <p>Contact phone <u>970-846-8819</u></p> <p>Contact email <u>860-850-3020</u></p>	<p><b>Where should payments to the creditor be sent? (if different)</b></p> <p>_____ Name</p> <p>_____ Number Street</p> <p>_____ City State ZIP Code</p> <p>Contact phone _____</p> <p>Contact email _____</p>
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Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
\_\_\_\_\_

4. Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

**STRETTO**  
**FEB 16 2023**  
**RECEIVED**

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STEVEN T. GUBNER – NV Bar No. 4624  
SUSAN K. SEFLIN – CA Bar No. 213865 – Admitted *Pro Hac Vice*  
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Facsimile: (866) 995-0215  
Email: sgubner@bg.law  
sseflin@bg.law  
jwellington@bg.law

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

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

In re:  
  
Front Sight Management LLC,  
  
Debtor.

Case No. 22-11824-abl  
  
Chapter 11

**Hearing Date:** August 21, 2023  
**Hearing Time:** 9:30 a.m.

**ORDER SUSTAINING FOURTEENTH OMNIBUS OBJECTION TO  
LATE-FILED PROOFS OF CLAIM**

On August 21, 2023 at 9:30 a.m., a hearing was held before the Honorable August Landis,  
Chief United States Bankruptcy Judge for the District of Nevada, for the Court to consider the  
*Fourteenth Omnibus Objection to Late-Filed Proofs of Claim* [ECF No. \_\_\_\_] (the “Omnibus

1 Objection”)<sup>1</sup> filed by Province, LLC, solely in its capacity as the duly authorized and acting  
 2 Liquidating Trustee (the “Liquidating Trustee”)<sup>2</sup> of the Front Sight Creditors Trust (the “Liquidating  
 3 Trust”). Appearances were as duly noted on the record at the hearing.

4 The Court, having read and considered the Omnibus Objection and all evidence filed in  
 5 support of the Omnibus Objection; the Court having considered the argument and representations of  
 6 counsel at the hearing and other matters which the Court may properly take judicial notice,  
 7 including, without limitation, the record in this case as reflected on the docket; the Court having set  
 8 forth its findings and conclusions on the record pursuant to Rule 52 of the Federal Rules of Civil  
 9 Procedure and Rule 7052 of the Federal Rules of Bankruptcy Procedure; the Court having found that  
 10 notice of the Omnibus Objection was sufficient under the circumstances and no other or further  
 11 notice is required; no responses to the Omnibus Objection having been filed; the Court having  
 12 determined that the legal and factual bases set forth in the Omnibus Objection establish just cause for  
 13 the relief sought therein; and after due deliberation and sufficient cause appearing therefor,

14 **IT IS HEREBY ORDERED** that the Omnibus Objection is sustained.

15 **IT IS HEREBY FURTHER ORDERED** that the following Proofs of Claim filed by the  
 16 following claimants (“Claimants”) shall be DISALLOWED in their entirety:

Claimant	Claim No.	Date Filed	Filed Claim Amount	Treatment
Bennett, Richard Dee	1066-1	02/24/2023	\$33,370.00	Disallowed
Compomizzo, David	1067-1	03/02/2023	\$22,000.00	Disallowed
McAvoy, Kathryn L.	1072-1	05/08/2023	\$0.00	Disallowed
McAvoy, Richard J.	1073-1	05/09/2023	\$5,000.00	Disallowed
Miller, Gary	1069-1	03/13/2023	\$138.00	Disallowed
Scruggs, William M.	1068-1	03/04/2023	\$3,767.10	Disallowed

26 <sup>1</sup> All initial capitalized terms not defined herein shall have the same meaning ascribed to them in the  
 Omnibus Objection.

27 <sup>2</sup> Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of  
 28 reorganization and order thereon, the Liquidating Trustee has standing to pursue all claim objections  
 of general unsecured creditors in this case.



1           **IT IS HEREBY FURTHER ORDERED** that for any Claim disallowed pursuant to this  
2 Order, Claimant forever waives such Claim against the Debtor, its estate, the Liquidating Trustee  
3 and the Liquidating Trust.

4           **IT IS HEREBY FURTHER ORDERED** that any further claims filed or asserted by the  
5 Claimants, including any amendments, shall be deemed disallowed without further Court order.

6           **IT IS HEREBY FURTHER ORDERED** that pursuant to Civil Rule 54(b), made applicable  
7 in contested matters through Bankruptcy Rules 7054 and 9014, this Order shall be treated as a final  
8 judgment with respect to Claimants and their Claims.

9           **IT IS SO ORDERED.**

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23 Prepared and Submitted By:

24 BG Law LLP

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