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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**

<p>16 In re:</p> <p>17 Front Sight Management LLC,</p> <p>18 Debtor.</p>	<p>19 Case No. 22-11824-abl</p> <p>20 Chapter 11</p> <p>21 <b>Hearing Date:</b> March 12, 2024  <b>Hearing Time:</b> 1:30 p.m.</p>
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22 **NOTICE OF HEARING ON LIQUIDATING TRUSTEE’S MOTION FOR AN ORDER IN  
 23 AID OF IMPLEMENTATION OF CONFIRMED CHAPTER 11 PLAN OF  
 24 REORGANIZATION DEEMING UNCLAIMED DISTRIBUTIONS TO CERTAIN  
 25 HOLDERS OF ALLOWED CLAIMS TO BE FORFEITED TO THE LIQUIDATING TRUST  
 26 PURSUANT TO 11 U.S.C. §§ 105(a) AND 1142 AND BANKRUPTCY RULE 3020(d)**

27 **PLEASE TAKE NOTICE** that a hearing will be held on **March 12, 2024, at 1:30 p.m.**  
 28 before the Honorable August Landis, Chief United States Bankruptcy Judge, in his Courtroom 1  
 located at 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, via ZoomGov, for the Court to  
 consider the *Liquidating Trustee’s Motion for an Order in Aide of Implementation of Confirmed  
 Chapter 11 Plan of Reorganization Deeming Unclaimed Distributions to Certain holders of Allowed  
 Claims to be Forfeited to the Liquidating Trust Pursuant to 11 U.S.C. §§ 105(a) and 1142 and*

1 *Bankruptcy Rule 3020(d)* [ECF No. 865] (the “Motion”) filed by Province, LLC, solely in its  
 2 capacity as the duly authorized and acting Liquidating Trustee (the “Liquidating Trustee”)<sup>1</sup> of the  
 3 Front Sight Creditors Trust (the “Trust”), pursuant to which the Liquidating Trustee seeks entry of  
 4 an order under Sections 105(a)<sup>2</sup> and 1142, Bankruptcy Rule 3020(d), Local Rule 3011.1, and  
 5 pursuant to the confirmation order entered in this case, deeming unclaimed distributions to certain  
 6 holders of allowed claims to be deemed forfeited to the Trust for the claimants’ failure to comply  
 7 with the terms of the confirmed plan and the liquidating trust agreement. Hearing information is  
 8 available at <https://www.nvb.uscourts.gov/case-info/mega-cases/>.

9 **PLEASE TAKE FURTHER NOTICE** that the Motion pertains to the claims (the “Affected  
 10 Claims”) of each of the creditors (the “Affected Creditors”) set forth in **Exhibit 1** to the Motion,  
 11 which exhibit is also attached to this Notice. **Exhibit 1** lists the Affected Creditors alphabetically by  
 12 the Affected Creditors’ last name, or first name for businesses, and shows the claim number for, and  
 13 the amount of, each of the Affected Claims.<sup>3</sup>

14 **PLEASE TAKE FURTHER NOTICE** that the Liquidating Trustee has filed the Motion  
 15 out of an abundance of caution to implement the result specified in the confirmed *Debtor’s Second*  
 16 *Amended Chapter 11 Plan of Reorganization* [ECF No. 405] (together with any and all amendments  
 17 thereto, all exhibits and schedules thereto and all documents incorporated by reference therein  
 18 including all supplements, the “Plan”). As set forth in the Plan, in relevant part, an unclaimed  
 19 distribution is defined as any disbursement that was not made because the Holder (as defined in the  
 20 Plan) of any Allowed Claim (as defined in the Plan) failed to provide required tax information within  
 21 45 days after the Liquidating Trustee has sent any request for such information. Pursuant to the  
 22 order confirming the Plan [ECF No. 556], any unclaimed distribution attributable to an allowed  
 23 general unsecured claim shall be forfeited to the Trust.

24  
 25 <sup>1</sup> Pursuant to Front Sight Management, LLC’s (the “Debtor”) confirmed chapter 11 plan of  
 26 reorganization and order thereon, the Liquidating Trustee is overseeing and administering general  
 unsecured claims and distributions thereon.

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

<sup>3</sup> The Affected Claims of the Affected Creditors total, in the aggregate, approximately \$1.58 million.

1           **PLEASE TAKE FURTHER NOTICE** that each of the Affected Creditors has received no  
2 fewer than six (6) notices from the Liquidating Trustee notifying them of their obligation to provide  
3 their taxpayer identification number to the Liquidating Trustee, the most recent notice having been  
4 sent to each of the Affected Creditors on January 24, 2024. These notices, among other things,  
5 notified the Affected Creditors they were required to provide their taxpayer identification  
6 information and that their claims would be forfeited if the information was not provided. None of  
7 the Affected Creditors provided the requested taxpayer identification information to the Liquidating  
8 Trustee, as evidenced by the concurrently filed Swift Declaration.

9           **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and the supporting  
10 declaration of Amanda Demby Swift may be obtained from the Court, located at the Foley Federal  
11 Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, through the Court’s electronic  
12 filing system (<https://ecf.nvb.uscourts.gov/>), for free at the Debtor’s noticing agent’s website  
13 <https://cases.stretto.com/FrontSight> or by sending a written request to counsel for the Liquidating  
14 Trustee, Susan K. Seflin, via email at [sseflin@bg.law](mailto:sseflin@bg.law). If the Motion pertains to you, you should  
15 have received a copy of the Motion with this Notice.

16           **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 9014(d)(1), any  
17 opposition or response to the Motion (i) must set forth all relevant facts and any relevant legal  
18 authority, (ii) must be supported by affidavits or declarations that conform to the provisions of Local  
19 Rule 9014(c), and (iii) must be filed with the Court no later than **February 27, 2024 (or 14 days**  
20 **before the hearing)**.

21           **NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief sought  
22 in the Motion, or if you want the Court to consider your views on the Motion, then you must file an  
23 opposition with the Court, and serve a copy on the person making the Motion **no later than 14 days**  
24 preceding the hearing date for the Motion, unless an exception applies (*see* Local Rule 9014(d)(3)).

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If you object to the relief requested, you *must* file a **WRITTEN** response to the Motion with the Court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the Court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

DATED: February 13, 2024

BG Law LLP

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

# **EXHIBIT 1**

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
1	ADAMSON, KIM	2402906		\$350,000.00
2	ALLEN, DARLENE	2402919		\$3,000.00
3	ANGEL, RAFAEL	2402941		\$48,000.00
4	AVANT, IRA M. [AVANT, MIKE]	8-1	5/26/2022	\$10,000.00
5	BANNING, DARRELL	2402996		\$6,000.00
6	BARRANCO, ROGER	2403020		\$18,006.00
7	BELL, TIMOTHY	2403047		\$3,000.00
8	BLEVINS, JOHN	2403108		\$3,000.00
9	BOYER, TERRY	2403149		\$6,000.00
10	BROWN, RICHARD	2403193		\$6,000.00
11	CAMPBELL, ROBERT	745-1	10/31/2022	\$3,995.00
12	CART, CURTIS	2403258		\$3,000.00
13	CHONG, GEORGE	599-1	10/19/2022	\$2,995.00
14	CLARRY, KEITH	2403315		\$9,003.00
15	COCO, RONNIE	2403338		\$6,000.00
16	COOPER, MICHAEL (Texas)	2403382		\$1,500.00
17	COVE, NORMAN	2403392		\$3,000.00
18	CRANMER, ROSS	2403397		\$6,000.00
19	CRAWLEY, HENRY	2403395		\$5,003.00
20	DABBS, VAUGHAN	925-1	11/14/2022	\$24,000.00
21	DAVIS, BRIAN	2403448		\$6,000.00
22	DEARTH, CYNTHIA	2403468		\$12,000.00
23	DOBBS, EDWARD	2403512		\$24,000.00
24	DYER, ROBERT	2403564		\$6,000.00
25	EBRIGHT, SCOTT	2403573		\$24,000.00
26	ECKENROTH, WILLIAM	2403569		\$6,000.00
27	EMBAUGH, TERRY	2403607		\$6,000.00
28	ESPINOSA, RANDALL	2403621		\$3,000.00
29	FAN, KEN	258-2	1/2/2023	\$18,118.00
30	FEILD, JAKE	623-1	10/23/2022	\$2,500.00
31	FELIX, TED	2403657		\$3,000.00
32	FISCHER, DANIEL	2403689		\$2,500.00
33	FOGLE, RODNEY	2403693		\$3,000.00
34	FORMAN, PATRICIA	146-2	6/14/2022	\$3,342.00
35	FRY, THOMAS	2403732		\$3,000.00
36	GABRIELSON, DANIEL	2403731		\$3,000.00
37	GALLO, TIMOTHY	2403747		\$35,000.00
38	GEYER, DON	2403787		\$12,000.00
39	GOEKEN, ANTHONY	2403815		\$3,000.00
40	GREEN, DARIUS	2403845		\$3,000.00
41	GREENWALD, ROBERT	2403862		\$6,000.00
42	GREGORY, JOHN	718-1	10/30/2022	\$2,397.00
43	GRONINGER, CRAIG	2403868		\$3,000.00
44	GROOTERS, RONALD	2403885		\$6,000.00
45	GUICHARD, MICHEL	2403891		\$3,000.00

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
46	GULDE, CHRISTIAN	481-1	10/11/2022	\$3,642.00
47	GUNCRAFTERS	2403888		\$2,662.00
48	HELWIG, LELAND	2404001		\$12,000.00
49	HENSLEY, LINDA C	356-1	10/5/2022	\$2,700.00
50	HOGSETT, ROGER	2404056		\$6,000.00
51	HORNEY, EDWIN	2404068		\$3,000.00
52	HOWARD, WILLIAM	2404072		\$3,000.00
53	JACKSON, RICHARD	2404124		\$6,000.00
54	JANNUZZI, CHRISTIAN	843-1	11/3/2022	\$5,272.00
55	JOHNSON, ROBERT	2404173		\$6,000.00
56	JORGENSEN, STEVEN	2404197		\$500.00
57	KAPLER, JOHN	2404214		\$7,500.00
58	KEIM, JEFF	2404252		\$6,000.00
59	KONRAD, PETER [DANELLE, JORDAN, GARRETT & AMANDA KONRAD]	477-1	10/11/2022	\$2,894.00
60	KOPLow, STEVEN	2404301		\$13,268.00
61	KWANG, DANIEL	2404336		\$6,000.00
62	LAIRD, WILLIAM	2404324		\$33,503.00
63	LANGO, RICHARD	2404368		\$3,000.00
64	LEMAY, ARMAND	2404408		\$3,000.00
65	LEWIS, DAVID CLYDE	20-1	5/27/2022	\$7,020.00
66	LIPPMANN, ROBERT	1065-1	2/15/2023	\$5,000.00
67	LOCKE, DAVID	2404430		\$9,003.00
68	LOGIUDICE, ERIC	2404445		\$6,000.00
69	LOVERING, GENE	2404437		\$24,000.00
70	MACARTHUR, ROBERT	2404453		\$6,000.00
71	MACDONALD, PAUL	830-1	11/3/2022	\$13,996.00
72	MACIAS, CHARLENE	2404452		\$6,000.00
73	MADDOX, DENIS	2404455		\$3,000.00
74	MALONE, PETER THEODORE	35-1	5/27/2022	\$3,317.00
75	MARCH, JOHN	2404486		\$24,000.00
76	MARMAN, LUKE	2404492		\$6,000.00
77	MCCAMBRIDGE, WARREN	2404537		\$6,000.00
78	MCCARTHY, ANTHONY	2404558		\$3,000.00
79	MCINTYRE, GENE	2404585		\$3,000.00
80	MCKEE, JEFF	2404563		\$4,500.00
81	MCNEELY, JAMES	2404571		\$6,000.00
82	MERRELL, LESLIE	2404601		\$3,000.00
83	MERTZ, EUGENE	2404610		\$3,500.00
84	MONROE, BASIL	2404656		\$6,000.00
85	MYERS, RICHARD	2404700		\$3,000.00
86	NESSEN, STEVEN	109-1	6/4/2022	\$5,000.00
87	NEWPORT, SHAWN	2404777		\$3,000.00
88	ORNDORFF, ALAN	2404819		\$4,500.00
89	PALMER, JOHN (California)	2404840		\$1,500.00

	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
90	PAPAIAN, HAIG	2404843		\$35,000.00
91	PARSONS, JAMES	2404836		\$6,000.00
92	PATSCH, JACK	2404842		\$6,000.00
93	PAUL THOMPSON BRICKER	497-1	10/12/2022	\$4,191.00
94	PEASE, MARTIN	2404838		\$3,000.00
95	PENDLEY, LEMAN W	98-1	6/3/2022	\$20,041.80
96	PETRONE, STEVEN	2404907		\$6,000.00
97	PILUSO, DOM	2404890		\$7,500.00
98	PINCKERT, THOMAS	369-1	10/6/2022	\$9,000.00
99	POLLOCK, PETER	498-1	10/12/2022	\$2,596.00
100	PRESTON ARZA LLP	2404963		\$72,444.60
101	PURDY, STEVEN	2404960		\$5,000.00
102	RAMIREZ, JACK	2404959		\$3,000.00
103	RANDOLPH, MICHAEL	2405004		\$6,000.00
104	RAPPLEYE, JACOB	2405006		\$3,000.00
105	RAYMER, LEIGHTON	2404978		\$6,000.00
106	ROBERTSON, JAMES (Utah)	2405042		\$500.00
107	RODERICK, STACY	944-1	11/18/2022	\$4,997.00
108	RYAN, JAMES	2405100		\$3,000.00
109	SARDELLA, CRAIG	2405157		\$6,000.00
110	SCHAEFFER, JAMES	2405168		\$35,000.00
111	SCHIEBER, CEDRIC	2405178		\$3,000.00
112	SEYMOUR, JOHN	2405205		\$3,500.00
113	SGARLATTI, ANTHONY	273-1	8/8/2022	\$11,692.00
114	SHEFFIELD, STEPHEN	2405243		\$48,000.00
115	SHERFEY, BRADFORD	2405217		\$6,000.00
116	SIGURDSON, VINCENT	2405263		\$3,000.00
117	SIMMONS, DANIEL	2405269		\$31,006.00
118	SIMPSON, GARY	2405247		\$3,000.00
119	SIPES, BRETT	2405286		\$4,500.00
120	SIPES, MONA	2405248		\$6,000.00
121	SMITH, EMANUEL	2405276		\$3,000.00
122	SMITH, JERRY	2405306		\$6,000.00
123	SOMMER, DAVID [SOMMER, DAVID EDWARD]	937-1	11/16/2022	\$9,139.00
124	SPRAGUE, BASIL	2405346		\$48,000.00
125	STETSON, MARK	166-1	6/22/2022	\$4,272.00
126	STOCKDALE, ROGER	2405372		\$3,000.00
127	STONE, ROBERT	164-1	6/22/2022	\$7,000.00
128	THREADGILL, JOHN	2405467		\$1,500.00
129	TO, VINCENT	2405461		\$6,000.00
130	TORRES, JOE	2405470		\$6,000.00
131	TURNER, JACK	2405487		\$3,000.00
132	VAN LENNEP, JOHN	2405505		\$3,000.00
133	VANDESTEEG, JIM	2405514		\$6,000.00



	Claimant	Schedule Number/ Claim Number	Date Filed	Claim Amount
134	VILLASIS, REGINALD	2405542		\$3,000.00
135	WAHLQUIST, JOHN	331-1	9/6/2022	\$6,000.00
136	WARD, DAVID (Lousiana)	2405592		\$500.00
137	WATTS, LENNY	2405634		\$22,006.00
138	WEBB, RANDALL R [WEBB, RANDY]	285-1	8/8/2022	\$15,545.00
139	WELBORN, FRANKLIN	2405655		\$6,000.00
140	WELLING, DAVID	2405650		\$35,000.00
141	WHITEHEAD, DANIEL	2405680		\$3,000.00
142	WINDER, DAN	2405725		\$2,503.00
143	WISE, STEVEN	633-1	10/24/2022	\$4,750.00
144	WOODS, BRUCE	2405729		\$2,500.00
145	YORK, JOHN	2405773		\$3,000.00