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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:  
  
FRONT SIGHT MANAGEMENT LLC,  
  
Debtor.

Case No. 22-11824-abl  
  
Chapter 11

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

**FINAL FEE APPLICATION OF DUNDON ADVISERS LLC FOR COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
AS FINANCIAL ADVISER TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF FRONT SIGHT MANAGEMENT LLC FOR  
THE PERIOD FROM JUNE 15, 2022 THROUGH DECEMBER 9, 2022**

Pursuant to section 330 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of Nevada (the “Local Rules”), and the *Order Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals* (the “Interim Compensation Order”),<sup>1</sup> Dundon Advisers LLC (“Dundon”), as financial adviser to the Official Committee of Unsecured Creditors (the “Committee”) of Front Sight Management LLC, the above-captioned debtor and debtor-in-possession (the “Debtor”), hereby submits this Final fee application (the “Application”) seeking entry of an order granting it final allowance and approval of \$268,436.00

<sup>1</sup> Docket No. 318.

1 in fees incurred during the period from June 15, 2022 through and including December 9, 2022 (the  
2 “Final Period”).

3 This Application is made and based upon the following Memorandum of Points and  
4 Authorities, the declarations of Eric A. Reubel and Mark Eagleton, each filed concurrently herewith,  
5 the papers and pleadings on file herein, judicial notice of which is respectfully requested, and any  
6 argument of counsel at the time of hearing on the Application.

7 **I. SUMMARY OF REQUESTED RELIEF AND EVIDENCE**

8 1. This Application has been prepared in accordance with the United States  
9 Trustee’s *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses*  
10 *Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases* (the “U.S. Trustee  
11 Guidelines”), as well as in accordance with Bankruptcy Rule 2016 and Local Rule 2016. This is  
12 Dundon’s Final application for allowance of compensation and reimbursement of expenses in the  
13 Debtor’s chapter 11 case. Dundon seeks payment of 100% of its fees relating to services rendered  
14 during the Final Period.

15 2. This Application sets forth the fees and expenses Dundon incurred as  
16 financial adviser to the Committee during the Final Period. Dundon requests final allowance of  
17 compensation in the amount of \$268,436.00 and reimbursement of expenses in the amount of \$0.00  
18 for a total of \$268,436.00 for services rendered during the Final Period.

19 3. **Exhibit 1** provides a summary of compensation requested by project category  
20 for the Final Period.

21 4. **Exhibit 2** provides itemized time records of the professionals that have  
22 rendered services to the Committee between September 1, 2022 and December 9, 2022 (the “Second  
23 Interim Period”).

24 5. **Exhibit 3** is a summary of fees by professional. This summary sets forth the  
25 total fees incurred by each timekeeper that worked on this case and sets forth each professional’s  
26 hourly rate and the total amount billed by the professional during the Final Period.

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1           **II.       JURISDICTION AND VENUE**

2                     6.       This Court has jurisdiction over this Application pursuant to  
3 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (B).

4                     7.       Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

5                     8.       Pursuant to Local Rule 9014.2, Dundon consents to entry of final order(s) or  
6 judgment(s) by the bankruptcy judge if it is determined that the bankruptcy judge, absent consent of  
7 the parties, cannot enter final orders for judgment consistent with Article III of the United States  
8 Constitution.

9           **III.       BACKGROUND**

10                    9.       On May 24, 2022 (the "Petition Date"), the Debtor filed a voluntary petition  
11 for relief under chapter 11 of the Bankruptcy Code with this Court. Since the Petition Date, the  
12 Debtor has remained in possession of its assets and has continued to operate and manage its business  
13 as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

14                    10.      On June 9, 2022, the Office of the United States Trustee for Region 17 (the  
15 "US Trustee") appointed a five-member Committee consisting of: (i) Steven M. Huen; (ii) Gary  
16 Cecchi; (iii) David Streck; (iv) Thomas E. Donaghy; and (v) ALM Investments LLC.<sup>2</sup> The  
17 Committee selected Kelley Drye & Warren LLP as its proposed lead counsel and Carlyon Cica Chtd.  
18 ("Carlyon") as proposed Nevada counsel. The Committee also selected Dundon as its proposed  
19 financial advisor.

20                    11.      On July 1, 2022, Dundon filed the *Application for Order Authorizing the*  
21 *Employment and Retention of Dundon Advisers LLC as Financial Adviser for the Official Committee*  
22 *of Unsecured Creditors Effective as of June 15, 2022* (the "Retention Application").<sup>3</sup> The Court  
23 entered an order approving the Retention Application on July 29, 2022.<sup>4</sup>

24                    12.      On September 23, 2022, Dundon filed its first interim fee application  
25 (the "First Interim Fee Application")<sup>5</sup> for compensation for services rendered and reimbursement of

26                    <sup>2</sup>       Docket No. 116.

27                    <sup>3</sup>       Docket No. 236.

28                    <sup>4</sup>       Docket No. 303.

<sup>5</sup>       Docket No. 366.

1 expenses incurred for the period from June 15, 2022 through and including  
2 August 31, 2022 (the “First Interim Period”). On October 25, 2022, the Court entered an order  
3 granting the First Interim Fee Application.<sup>6</sup>

4 13. On October 5, 2022, the Debtor filed the *Second Amended Chapter 11 Plan*  
5 *of Reorganization for Front Sight Management LLC, Under Chapter 11 of the Bankruptcy Code*  
6 [ECF No. 405] (the “Plan”).

7 14. On November 29, 2022, the court confirmed the Plan by *the Findings of Fact,*  
8 *Conclusions of Law, and Order Confirming the Second Amended Chapter 11 Plan of Reorganization*  
9 *for Front Sight Management LLC Under Chapter 11 of the Bankruptcy Code* [ECF No. 556] (the  
10 “Confirmation Order”).

11 15. All conditions of the Plan were met on December 2, 2022 (the “Effective  
12 Date”) [ECF No. 584].

13 **IV. SERVICES RENDERED DURING THE FINAL PERIOD**

14 16. Dundon rendered the following professional legal services to the Committee  
15 during the Final Period:

- 16 a. Assisting in the analysis, review and monitoring of the restructuring process,  
17 including, but not limited to an assessment of the unsecured claims pool and potential  
18 recoveries for unsecured creditors;
- 19 b. Developing a complete understanding of the Debtor’s business and its valuations;
- 20 c. Determining whether there are viable alternative paths for the disposition of the  
21 Debtor’s assets (e.g., restructuring, sale) from those proposed by the Debtor;
- 22 d. Assisting the Committee in identifying, valuing and pursuing estate causes of action;
- 23 e. Assisting the Committee to address claims against the Debtor and to identify,  
24 preserve, value and monetize tax assets of the Debtor;
- 25 f. Advising the Committee in negotiations with the Debtor and third parties;
- 26 g. Assisting the Committee in reviewing the Debtor’s financial reports, including, but  
27 not limited to, statements of financial affairs and schedules of assets and liabilities;
- 28 h. Reviewing and providing analysis on the Plan and disclosure statement;
- i. Attending meetings and assisting in discussions with the Committee, the Debtor, and  
other parties in interest and professionals;

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<sup>6</sup> Docket No. 454.

- 1           j. Presenting at meetings of the Committee, as well as meetings with other key  
2           stakeholders and parties; and
- 3           k. Providing testimony on behalf of the Committee as and when may be deemed  
4           appropriate.

5           17. To assist the Court in its review of the fees requested in this Application, Dundon has  
6           divided its time entries into the project categories set forth below.

7           **Business Analysis**

8           18. The time incurred in this task reflects time spent examining Debtor’s business and  
9           strategy, reviewing company projections and forecasts, in concert with Committee Counsel,  
10          analyzing monthly operating reports, reviewing transaction documents and negotiating with  
11          professionals fees to maximize value to the unsecured creditors. Dundon spent a total of 46.7 hours  
12          performing services related to Business Analysis and charged fees for these services in the amount  
13          of \$31,148.00.

14          **Case Administration**

15          19. The time incurred in this task reflects time spent on the administration of the chapter  
16          11 case, including reviewing the docket to remain apprised with the status of the chapter 11 case,  
17          reviewing the Interim Compensation Procedures Order, and conducting status calls. Dundon spent  
18          a total of 3.5 hours performing services related to Case Administration and charged fees for these  
19          services in the amount of \$2,363.00.

20          **Claims Analysis**

21          20. The time incurred in this task code reflects time analyzing (and reviewing the analysis  
22          of others) of potential claims upon the debtor’s estates and conferring with parties regarding the  
23          same. Dundon spent a total of 5.8 hours performing services related to the Claims Analysis and  
24          charged fees for these services in the amount of \$4,205.50.

25          **Court Hearings**

26          21. The time incurred in this task code reflects time spent attending hearings. Dundon  
27          spent a total of 5.1 hours performing services related to the Court Hearings task and charged fees for  
28          these services in the amount of \$3,714.00.

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1 **Committee Member/Professional Meetings & Communications**

2 22. The time incurred in this task reflects time spent conferring with the Debtor's  
3 professionals, Committee members, Committee counsel and internally with other professionals of  
4 Dundon regarding this chapter 11 case, including preparing presentations for Committee calls.  
5 Dundon spent a total of 55.7 hours performing services related to Meetings and Communications  
6 with Committee members and professionals and charged fees for these services in the amount of  
7 \$38,707.00.

8 **Investigations**

9 23. The time incurred in this task code reflects time analyzing i) shareholder  
10 distributions, ii) Front Sight tax returns, iii) shareholder tax returns, iv) production of shareholder  
11 communications with committee members, v) financial statements, vi) debtor produced documents  
12 and vii bank account records. Dundon also participated in meetings with the Debtor's financial  
13 advisers and tax professionals and conducted a site visit. The issues Dundon investigated included  
14 water rights issues, development issues, capital expenditures and progress toward delivering  
15 shareholder development of a resort property. Dundon drafted status reports and supported  
16 Committee counsel, preparing and investigating facts for the Committee plan objection and helping  
17 Committee counsel prepare for proposed deposition of the shareholder. Dundon spent a total of  
18 132.9 hours performing services related to investigations and charged fees for these services in the  
19 amount of \$88,609.00.

20 **Plan and Disclosure Statement**

21 24. The time incurred in this task code reflects time spent analyzing and reviewing the  
22 Debtor's initial plan and accompanying disclosure statement and stress-testing the Debtor's financial  
23 projections in same. Dundon incurred further time in this task code i) reviewing, analyzing and  
24 commenting on the Debtor's first and second amended disclosure statement and the Plan, ii)  
25 reviewing and analyzing various declaration in support of the Plan, iii) reviewing and analyzing  
26 objections to the Plan from various parties and interests, iv) supporting Committee counsel in  
27 preparation of the Committee's disclosure statement objection and Plan objection, v) drafting and  
28 preparing Dundon's declaration in support of the Committee Plan objection, vi) supporting

1 Committee counsel in negotiations leading to resolution of all Committee objections to the Plan.  
2 Dundon spent a total of 122.3 hours performing services related to the Plan and Disclosure Statement  
3 and charged fees for these services in the amount of \$84,483.50.

4 **Retention and Fee Applications**

5 25. The time incurred in this task reflects time spent drafting the Dundon's retention  
6 application, conferring with counsel regarding same and preparing the first combined monthly fee  
7 statement, which Dundon served on the Reviewing Parties (as defined in the Interim Compensation  
8 Order). Dundon spent a total of 18.8 hours performing services related to the Retention and Fee  
9 Applications and charged fees for these services in the amount of \$14,309.00.

10 **Review of Other Case Professionals**

11 26. The time incurred in this task reflects time spent reviewing the interim fee  
12 applications of the Debtor's professionals. Dundon spent a total of 0.7 hours performing services  
13 related to the Retention and Fee Applications and charged fees for these services in the amount of  
14 \$532.00.

15 **Sale Process**

16 27. The time incurred in this task reflects time reviewing the stalking horse asset purchase  
17 agreement. Dundon spent a total of 0.5 hours performing services related to the Sale Process and  
18 charged fees for these services in the amount of \$365.00.

19 **V. ACTUAL AND NECESSARY DISBURSEMENTS**

20 28. Dundon did not incur any out of pocket disbursements during the Final Period.

21 **VI. VALUATION OF SERVICES**

22 29. During the Final Period, Dundon's professionals expended a total of 392.0 hours for  
23 which compensation is sought. **Exhibit 2** provides itemized time records of the attorneys and  
24 paraprofessionals that have rendered services to the Committee during the Second Interim Period.  
25 Dundon included itemized time records for the First Interim Period as an exhibit to the First Interim  
26 Fee Application.

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1           30.     The rates charged are Dundon’s normal hourly rates for work of this character and  
2 pursuant to the Dundon’s agreement with the Committee. The reasonable value of the services  
3 rendered by Dundon to the Committee during the Final Period is \$268,436.00

4           31.     All services for which compensation is requested by Dundon were performed for or  
5 on behalf of the Committee, and not on behalf of the Debtor or other persons. There is no agreement  
6 or understanding between Dundon and any other person, other than members of the firm, for the  
7 sharing of compensation to be received in this case.

8           **VII. THE REQUESTED COMPENSATION SHOULD BE ALLOWED**

9           32.     Section 330 provides that a Court may award a professional employed under section  
10 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered [and]  
11 reimbursement for actual, necessary expenses.”<sup>7</sup> Section 330 also sets forth the criteria for the award  
12 of such compensation and reimbursement:

13                   In determining the amount of reasonable compensation to be  
14 awarded to [a] professional person, the court shall consider the  
15 nature, the extent, and the value of such services, taking into account  
16 all relevant factors, including –

- 17                   (A)     the time spent on such services;
- 18                   (B)     the rates charged for such services;
- 19                   (C)     whether the services were necessary to the administration of,  
20 or beneficial at the time at which the service was rendered toward  
21 the completion of, a case under this title;
- 22                   (D)     whether the services were performed within a reasonable  
23 amount of time commensurate with the complexity, importance, and  
24 nature of the problem, issue, or task addressed;
- 25                   (E)     with respect to a professional person, whether the person is  
26 board certified or otherwise has demonstrated skill and experience  
27 in the bankruptcy field; and
- 28                   (F)     whether the compensation is reasonable based on the  
customary compensation charged by comparably skilled  
practitioners in cases other than cases under this title.<sup>8</sup>

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<sup>7</sup> 11 U.S.C. § 330(a)(1).

<sup>8</sup> 11 U.S.C. § 330(a)(3).



1 33. “A customary review of a fee application under § 330 starts with a determination of  
2 the ‘lodestar,’ by multiplying a reasonable number of hours expended by a reasonable hourly rate.”<sup>9</sup>  
3 In addition, a bankruptcy court examines the circumstances and manner in which services are  
4 performed and results achieved to determine a reasonable fee.<sup>10</sup> Such examination includes a review  
5 of the following factors:

6 (a) Were the services authorized?

7 (b) Were the services necessary or beneficial to the administration  
8 of the estate at the time they were rendered?

9 (c) Are the services adequately documented?

10 (d) Are the fees required reasonable, taking into consideration the  
factors set forth in section 330(a)(3)?

11 (e) In making the determination, the court must consider whether the  
12 professional exercised reasonable billing judgment.<sup>11</sup>

13 34. In this case, Dundon submits that the services for which it seeks compensation and  
14 the expenditures for which it seeks reimbursement in this Application were necessary for and  
15 beneficial to the Committee’s participation in this chapter 11 case. In accordance with the factors  
16 enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable  
17 given (i) the complexity of this case; (ii) the time expended; (iii) the nature and extent of the services  
18 rendered; (iv) the value of such services; and (v) the costs of comparable services other than in a  
19 case under this title. Accordingly, approval of the compensation for professional services and  
20 reimbursement of expenses sought in this Application is warranted.

21 **VIII. NOTICE**

22 35. Notice of this Application has been provided to the Reviewing Parties (as defined in  
23 the Interim Compensation Order) and in accordance with the provisions of the Plan. Because of the  
24

26 <sup>9</sup> *Unsecured Creditors’ Committee v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th Cir. 1991); *In re Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983).

27 <sup>10</sup> *See Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswig Drug Co. (In re Mednet)*, 251 B.R. 103, 108 (B.A.P. 9th Cir. 2000).

28 <sup>11</sup> *Id.*; *see also Leichty v. Neary (In re Strand)*, 375 F.3d 854, 860 (9th Cir. 2004).

1 nature of the relief requested, the Committee respectfully submits that no further notice of the  
2 Application is necessary or required under the circumstances.

3 **CONCLUSION**

4 **WHEREFORE**, Dundon respectfully requests that the Court: (i) grant the  
5 Application and authorize final allowance of compensation for necessary and valuable professional  
6 services rendered to the Committee in the sum of \$268,436.00; (ii) authorize payment of the  
7 amounts requested in the Application; and (iii) grant such other relief as this Court deems just and  
8 proper.

9 Respectfully submitted.

10 Dated: December 12, 2022.  
11 Las Vegas, NV

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*Financial Adviser to the Official Committee of  
Unsecured Creditors*

**Exhibit 1****COMPENSATION BY PROJECT CATEGORY  
JUNE 15, 2022 THROUGH AND INCLUDING DECEMBER 9, 2022**

<i>Categories</i>	<i>Hours</i>	<i>Fees</i>
Asset Analysis	0.0	\$0.00
Business Analysis	46.7	\$31,148.00
Case Administration	3.5	\$2,363.00
Claims Analysis	5.8	\$4,205.50
Court Hearings	5.1	\$3,714.00
Committee Member/Professional Meetings & Communications	55.7	\$38,707.00
Communications with Debtor's Advisers	0.0	\$0.00
Exit planning	0.0	\$0.00
Investigations	132.9	\$88,609.00
Plan and Disclosure Statement	122.3	\$84,483.50
Retention and Fee Applications	18.8	\$14,309.00
Review of Other Case Professionals	0.7	\$532.00
Sale Process	0.5	\$365.00
<b>Total, without giving effect to rate cap</b>	<b>392.0</b>	<b>\$268,436.00</b>

**Exhibit 2****ITEMIZED FEES**  
**SEPTEMBER 1, 2022 THROUGH AND INCLUDING DECEMBER 9, 2022**

<b>Time keeper</b>	<b>Date</b>	<b>Description</b>	<b>Task Code</b>	<b>Hours</b>	<b>Rate</b>	<b>Fee</b>
Zhu	9/4/2022	Review Insider Due Diligence files from Debtor; compile document list.	Business Analysis	1.2	\$ 625	\$ 750.00
Garbe	9/6/2022	Receive 2018 through 2020 federal tax returns of FSM, call with Eric to discuss issues to be investigated concerning Distributions to Share Holder are requested by counsel.	Investigations	0.7	\$ 625	\$ 437.50
Reubel	9/6/2022	Receive and review insider diligence materials from Debtor	Business Analysis	1.2	\$ 760	\$ 912.00
Reubel	9/6/2022	Telecon prep discussion w/ KDW and Dundon re: UCC meeting (.8); follow-up discussion w/ T. Rizvi re: same (.3)	Investigations	1.1	\$ 760	\$ 836.00
Reubel	9/6/2022	Telecon discussion w/ M. Garbe re: distributions to Share Holder are requested by counsel.	Investigations	0.7	\$ 760	\$ 532.00
Reubel	9/6/2022	Attend teams discussion w/ Dundon and KDW re: insider analysis	Investigations	0.8	\$ 760	\$ 608.00
Rizvi	9/6/2022	Participate on call with counsel to discuss term sheet, including following up with E. Reubel and Y. Kim (separately) on preparation for call with UCC	Investigations	1.1	\$ 760	\$ 836.00
Zhu	9/6/2022	Teams call with Kelley Drye regarding insider analysis.	Business Analysis	0.8	\$ 625	\$ 500.00
Zhu	9/6/2022	Call with Tabish Rizvi regarding insider analysis materials.	Business Analysis	0.2	\$ 625	\$ 125.00
Zhu	9/6/2022	Review Insider Due Diligence files from Debtor; revise document list; email Eric Reubel and Tabish Rizvi.	Business Analysis	2.0	\$ 625	\$ 1,250.00
Zhu	9/6/2022	Coordinate with Eric Reubel and Michael Garbe regarding tax return review and due diligence call.	Business Analysis	0.1	\$ 625	\$ 62.50
Reubel	9/7/2022	Review LVDF joint status report to continue hearing [D.I. 335]	Business Analysis	0.1	\$ 760	\$ 76.00

Reubel	9/7/2022	Prepare for and attend UCC call	Committee Member/Professional Meetings & Communications	1.3	\$ 760	\$ 988.00
Rizvi	9/7/2022	Participate on committee call to discuss for sale term sheet solicited by debtor	Investigations	1.0	\$ 760	\$ 760.00
Zhu	9/7/2022	Zoom committee call	Committee Member/Professional Meetings & Communications	1.1	\$ 625	\$ 687.50
Reubel	9/8/2022	Telecon discussion w/ T. Rizvi re: LVDF loan proceeds, including finding and sharing loan documents for LVDF mortgage/note	Investigations	0.3	\$ 760	\$ 228.00
Rizvi	9/8/2022	Participate on call with Eric Reubel regarding LVDF loan proceeds, including finding and sharing loan documents for LVDF mortgage/note	Investigations	0.3	\$ 760	\$ 228.00
Garbe	9/9/2022	Receive and start review of FSM 2018 through 2021 financial statements including balance sheet and income statement, and schedule of insider transactions as prepared by Province, compare balance and amount to tax returns, including amounts noted as Share Holder Loan and Share Holder Distributions.	Investigations	0.7	\$ 625	\$ 437.50
Garbe	9/9/2022	Tel call with tanner and Paul of Province and Eric to discuss information provided in insider transaction schedule as prepared by Tanner, the tax returns, and the F/S as well as issues concerning same.	Investigations	0.7	\$ 625	\$ 437.50
Reubel	9/9/2022	Telecon discussion w/ Y. Zhu re: site visit	Business Analysis	0.2	\$ 760	\$ 152.00
Reubel	9/9/2022	Receive Y. Zhu email re: financial statements	Business Analysis	0.1	\$ 760	\$ 76.00
Reubel	9/9/2022	Telecon discussion w/ Province and M. Garbe re: insider investigation	Investigations	0.7	\$ 760	\$ 532.00
Zhu	9/9/2022	Call with Eric Reubel regarding site visit and financial data.	Business Analysis	0.2	\$ 625	\$ 125.00
Zhu	9/9/2022	Site visit.	Business Analysis	3.4	\$ 625	\$ 2,125.00
Zhu	9/9/2022	Draft email to Michael Garbe and Eric Reubel regarding Front Sight's financial statements.	Business Analysis	0.1	\$ 625	\$ 62.50

		Continue investigation of Share Holder distributions and Share Holder Loan account, receive and review several journal entries provide by Province in support of transactions in these accounts, prepare analysis schedule, sent to Eric with comments.				
Garbe	9/10/2022		Investigations	3.0	\$ 625	\$ 1,875.00
Garbe	9/10/2022	Several Tel calls with Eric to discuss review of documents provided by Province, and to discuss findings determined by those documents.	Investigations	0.8	\$ 625	\$ 500.00
Garbe	9/10/2022	Follow-up Tel calls with Paul, Tanner, and Eric concerning information provided by Province and Dundon findings related to those documents.	Investigations	1.1	\$ 625	\$ 687.50
Reubel	9/10/2022	Receive and review M. Garbe analysis of insider transactions (.3); discussions with M. Garbe re: same (.8)	Investigations	1.1	\$ 760	\$ 836.00
Reubel	9/10/2022	Telecon discussions w/ Province and M. Garbe re: Province documents w/r/t insider transactions and tax distributions	Investigations	1.1	\$ 760	\$ 836.00
Reubel	9/10/2022	Review first amended ch 11 plan [D.I.337]	Plan and Disclosure Statement	2.3	\$ 760	\$ 1,748.00
Reubel	9/10/2022	Review first amended DS [D.I. 338]	Plan and Disclosure Statement	1.5	\$ 760	\$ 1,140.00
Garbe	9/11/2022	Receive and review additional information provided by Province in support of Share Holder Loan and Share Holder distribution accounts, confirm new information as consistent with tax returns and financial statements, and journal entries previously provided.	Investigations	1.2	\$ 625	\$ 750.00
Garbe	9/11/2022	Tel call with Eric to discuss in detail newly provided Share Holder transaction schedule, prepare email to Paul and Tanner outlining findings, prepare email to UCC counsel outlining findings of review of activity in Share Holder Loan and Share Holder Distribution accounts.	Investigations	1.9	\$ 625	\$ 1,187.50
Garbe	9/11/2022	Tel call with Paul Huygens to discuss findings associated with Share Holder Loan and Share Holder distribution accounts.	Investigations	0.3	\$ 625	\$ 187.50

Reubel	9/11/2022	Receive and review updated M. Garbe analysis of shareholder loan information (.3); follow-up discussions w/ M. Garbe re: same (1.7)	Investigations	2.0	\$ 760	\$ 1,520.00
Reubel	9/11/2022	Edit email to UCC counsel re: investigations into Share Holder Loan and Share Holder Distribution accounts.	Investigations	0.5	\$ 760	\$ 380.00
Reubel	9/11/2022	Telecon discussion w/ Province and M. Garbe re: Share Holder Loan and Share Holder distribution accounts	Investigations	0.3	\$ 760	\$ 228.00
Zhu	9/11/2022	Compile summary of site visit.	Business Analysis	1.8	\$ 625	\$ 1,125.00
Garbe	9/12/2022	Call with Eric to discuss topics for upcoming meeting with Province and Leslie Sobol, accountant for FSM.	Investigations	0.6	\$ 625	\$ 375.00
Garbe	9/12/2022	Call with Eric, Province and Leslie Sobol to discuss accounting methods and amortization of Share Holder loan account, deferred income recognition and its tax treatment an other matters.	Investigations	1.0	\$ 625	\$ 625.00
Reubel	9/12/2022	Telecon w/ M. Garbe re: prep for meeting with Province and Leslie Sobol, accountant for FSM.	Investigations	0.6	\$ 760	\$ 456.00
Reubel	9/12/2022	Telecon discussion w/ Province, L. Sobol and M. Garbe re: accounting methods for financial statements and tax distributions	Investigations	1.0	\$ 760	\$ 760.00
Reubel	9/12/2022	Draft call report to KDW re: meeting w/ Province and L. Sobel (.6); follow-up discussion w/ M. Garbe re: same (.2)	Investigations	0.8	\$ 760	\$ 608.00
Reubel	9/12/2022	Receive and review "gift card" breakage spreadsheet (.3); follow-up discussion w/ M. Garbe re: same (.2)	Investigations	0.5	\$ 760	\$ 380.00
Zhu	9/12/2022	Revise site visit summary.	Business Analysis	0.7	\$ 625	\$ 437.50
Garbe	9/13/2022	Call with Kelley Drye lawyers to review with them accounting methods and treatment of Share Holder Loan accounts, tax return treatment of same, and recognition of deferred income, pending Disclosure Statement objection and other matters.	Committee Member/Professional Meetings & Communications	1.1	\$ 625	\$ 687.50
Garbe	9/13/2022	Prepare UCC presentation of FSM's method for recording	Investigations	1.0	\$ 625	\$ 625.00

		and amortizing Share Holder Loans, deferred income, and Retained Earning treatment, send to Eric with comments.				
Reubel	9/13/2022	Receive and review Y. Zhu site visit summary	Business Analysis	0.8	\$ 760	\$ 608.00
Reubel	9/13/2022	Telecon discussion w/ KDW re: insider investigations, pending Disclosure Statement objection and other matters.	Committee Member/Professional Meetings & Communications	1.2	\$ 760	\$ 912.00
Reubel	9/13/2022	Prepare and edit UCC presentation	Investigations	1.0	\$ 760	\$ 760.00
Reubel	9/13/2022	Draft status report email to M. Dundon	Investigations	0.4	\$ 760	\$ 304.00
Reubel	9/13/2022	Review T. James email re: state court order w/r/t LVDF spending	Investigations	0.4	\$ 760	\$ 304.00
Reubel	9/13/2022	Review and respond to L. Schlusser email re: fee recap	Retention and Fee Applications	0.1	\$ 760	\$ 76.00
Zhu	9/13/2022	Revise site visit summary and email to Eric Reubel, Tabish Rizvi, and Michael Garbe.	Business Analysis	0.4	\$ 625	\$ 250.00
Zhu	9/13/2022	Review Amended Plan and Disclosure Statement	Business Analysis	0.4	\$ 625	\$ 250.00
Reubel	9/14/2022	Further revise UCC presentation	Committee Member/Professional Meetings & Communications	1.2	\$ 760	\$ 912.00
Reubel	9/15/2022	Review order denying to appoint examiner [D.I. 347]	Business Analysis	0.1	\$ 760	\$ 76.00
Reubel	9/16/2022	Prepare for and attend UCC call	Committee Member/Professional Meetings & Communications	1.7	\$ 760	\$ 1,292.00
Reubel	9/16/2022	Review UST objection to employ Greenberg Traurig [D.I. 349]	Review of Other Case Professionals	0.3	\$ 760	\$ 228.00
Zhu	9/16/2022	Review Kelly Drye's presentation before Committee call.	Committee Member/Professional Meetings & Communications	0.5	\$ 625	\$ 312.50
Zhu	9/16/2022	Attend committee call.	Committee Member/Professional Meetings & Communications	1.7	\$ 625	\$ 1,062.50
Garbe	9/17/2022	Call with Eric to discuss and further review Share Holder Loan account treatment, and 4 year look-back schedule prepared by Province.	Investigations	0.7	\$ 625	\$ 437.50
Reubel	9/17/2022	Telecon discussion w/ M. Garbe re: further review of Share Holder Loan account treatment, and 4 year look-back schedule prepared by Province	Investigations	0.7	\$ 760	\$ 532.00



Garbe	9/19/2022	Receive and review Front Sight Management's 2021 federal tax return, compare return to previously received FSM 2021 financial statements, note difference between documents.	Investigations	1.0	\$ 625	\$ 625.00
Garbe	9/19/2022	Prepare for meeting with Province and Eric to discuss recently provided 2021 tax return, 4 year look back schedule, and 12 year analysis of Share Holder distributions.	Investigations	0.5	\$ 625	\$ 312.50
Garbe	9/20/2022	Tel call with Province and Eric to discuss recently provided FSM's tax return and other schedules noting differences between documents, discuss source of differences, agree that Province will provide additional schedules and other information in support of their previous analysis.	Investigations	0.5	\$ 625	\$ 312.50
Garbe	9/20/2022	Call with Eric, then Lauren to discuss findings from discussion with Province and status of Disclosure Statement objection and timing.	Investigations	0.4	\$ 625	\$ 250.00
Reubel	9/20/2022	Telecon discussion w/ M. Garbe and L. Schlüssel re: Disclosure Statement objection and timing	Committee Member/Professional Meetings & Communications	0.4	\$ 760	\$ 304.00
Reubel	9/20/2022	Telcon discussion w/ Province and M. Garbe re: insider investigation	Investigations	0.5	\$ 760	\$ 380.00
Reubel	9/20/2022	Discussion w/ P. Hyugens re: DS Status	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Reubel	9/20/2022	Prepare First Interim fee application	Retention and Fee Applications	3.0	\$ 760	\$ 2,280.00
Reubel	9/21/2022	Review R. Vohra comments to first interim fee application	Retention and Fee Applications	0.3	\$ 760	\$ 228.00
Reubel	9/22/2022	Review Aug MOR [D.I. 354]	Business Analysis	0.3	\$ 760	\$ 228.00
Reubel	9/23/2022	Review committee draft DS objection	Plan and Disclosure Statement	0.8	\$ 760	\$ 608.00
Reubel	9/25/2022	Review first interim fee application of Province [D.I. 358]	Review of Other Case Professionals	0.4	\$ 760	\$ 304.00
Garbe	9/27/2022	Call with Eric to discuss FSM's 4 year look back	Investigations	0.5	\$ 625	\$ 312.50
Garbe	9/27/2022	Receive response to request for further analysis of 4 year look back calculation by Province, prepare further reconciliation of 4 year look back to 10 year	Investigations	4.0	\$ 625	\$ 2,500.00

		look back, and general ledger for Share Holder Loan account				
Garbe	9/27/2022	Call with Eric to discuss findings of reconciliation of 4 year look back to 10 year look back and general ledger for Share Holder account, discuss various possible counter proposals to GUC settlement, assist Eric in preparation of email to Kelley Drye with outline of findings from reconciliations.	Investigations	1.1	\$ 625	\$ 687.50
Reubel	9/27/2022	Telecon discussion w/ M. Garbe re: shareholder investigation (1.1); draft email to KDW re: same (.6)	Committee Member/Professional Meetings & Communications	1.7	\$ 760	\$ 1,292.00
Reubel	9/27/2022	Telecon discussion w/ KDW and Dundon re: case strategy and potential settlement with PrairieFire	Investigations	0.9	\$ 760	\$ 684.00
Reubel	9/27/2022	Telecon discussion w/ M. Garbe re: 4-year look back	Investigations	0.5	\$ 760	\$ 380.00
Rizvi	9/27/2022	Participate on call with counsel regarding scope of settlement with Prairie Fire	Investigations	0.9	\$ 760	\$ 684.00
Zhu	9/27/2022	Call with Kelly Drye regarding claims and strategy going forward.	Investigations	1.1	\$ 625	\$ 687.50
Zhu	9/27/2022	Review insider analysis dataroom and draft email to Eric Reubel, Michael Garbe, and Tabish Rizvi.	Business Analysis	0.4	\$ 625	\$ 250.00
Reubel	9/28/2022	Telecon discussion w/ KDW and Dundon to establish revised ranges for avoidance action against Piazza for fraud (1.3); follow-up w/ Dundon team re: same (.3)	Investigations	1.6	\$ 760	\$ 1,216.00
Reubel	9/28/2022	Telecon discussion w/ KDW and Dundon re: scope of settlement with Prairie Fire	Investigations	0.3	\$ 760	\$ 228.00
Reubel	9/28/2022	Review debtor's omnibus reply to UST, Committee and LVDF DS objections [D.I. 387]	Plan and Disclosure Statement	0.7	\$ 760	\$ 532.00
Rizvi	9/28/2022	Participate in follow on discussion with Y. Zhu about \$2.9mm missing from additional paid in capital	Investigations	0.1	\$ 760	\$ 76.00
Rizvi	9/28/2022	Participate on call with counsel to establish revised ranges for avoidance action against Piazza for fraud	Investigations	1.3	\$ 760	\$ 988.00
Rizvi	9/28/2022	Participate on call with counsel regarding possible regarding	Investigations	0.3	\$ 760	\$ 228.00

		scope of settlement with Prairie Fire				
Rizvi	9/28/2022	Participate on call with team to discuss scope of settlement with Prairie Fire and adjustment to amount distributed to Piazza	Investigations	0.3	\$ 760	\$ 228.00
Garbe	9/28/2022	Call with Lauren of KD to discuss e-mail out line of reconciliations of 4 year look back and 10 year look back, Tax return distributions and approach to GUC settlement counter proposals,	Committee Member/Professional Meetings & Communications	1.0	\$ 625	\$ 625.00
Garbe	9/28/2022	Call with Jason and Eric to discuss calculations of 4 year look back and 10 year look back and application of those finding to UCC settlement counter proposal.	Committee Member/Professional Meetings & Communications	0.5	\$ 625	\$ 312.50
Reubel	9/28/2022	Telecon discussion w/ M. Garbe and L. Schlusel re: Tax Distributions and approach to GUC settlement counter proposal (1.0); follow-up discussion w/ J. Adams re: same (5)	Committee Member/Professional Meetings & Communications	1.5	\$ 760	\$ 1,140.00
Reubel	9/29/2022	Review debtor's objection to LVDF claim [D.I. 393]	Claims Analysis	0.5	\$ 760	\$ 380.00
Reubel	9/30/2022	Attend DS hearing	Court Hearings	1.5	\$ 760	\$ 1,140.00
Reubel	10/4/2022	Review second amended Plan [D.I.405] and DS [D.I. 406]	Plan and Disclosure Statement	1.3	\$ 760	\$ 988.00
Reubel	10/7/2022	Review first omnibus claims objection [D.I. 411]	Claims Analysis	0.3	\$ 760	\$ 228.00
Reubel	10/11/2022	Draft email to M. Dundon re: insider loan investigation	Investigations	0.2	\$ 760	\$ 152.00
Garbe	10/12/2022	Telecon prep-discussion w/ M. Garbe re: call w/ L. Schlusel	Committee Member/Professional Meetings & Communications	0.8	\$ 625	\$ 500.00
Garbe	10/12/2022	Call with Lauren and Dundon team to discuss Share Holder Distribution accountings, schedule prepared for meeting, schedule prepared by Province (9.11.2022 Exhibit), accounting methodology used to post loans and write off to Retained Earnings the reporting Tax Distributions, possible 2004 motion to obtain additional information.	Committee Member/Professional Meetings & Communications	1.0	\$ 625	\$ 625.00
Garbe	10/12/2022	Call with Eric to review in detail Province prepared 9.11.2022 Exhibit including	Investigations	4.1	\$ 625	\$ 2,562.50

		Share Holder Loan account postings and write offs, Tax Distribution amounts, confirmation of amounts by tracing to g/l and tax returns, additional items needed to complete confirmation process, revise Exhibit to clarify meaning of amounts found in schedule, write detailed memo explaining Exhibit review findings, send to Kelley Drye with comments.				
Reubel	10/12/2022	Telecon prep discussion w/ M. Garbe re: conference with L. Schlusser	Committee Member/Professional Meetings & Communications	0.8	\$ 760	\$ 608.00
Reubel	10/12/2022	Telecon discussion w/ L. Schlusser and Dundon team re: shareholder investigation	Committee Member/Professional Meetings & Communications	1.0	\$ 760	\$ 760.00
Reubel	10/12/2022	Telecon discussion w/ M. Garbe re: Province prepared 9.11.2022 Exhibit (.5); receive and review M. Garbe memo and edit into declaration draft (1.5)	Investigations	2.0	\$ 760	\$ 1,520.00
Reubel	10/12/2022	Review J. Adams email re: request, if needed, for additional diligence	Investigations	0.1	\$ 760	\$ 76.00
Reubel	10/12/2022	Draft email to J. Adams re: 9:11 exhibit an shareholder distributions	Investigations	0.3	\$ 760	\$ 228.00
Zhu	10/12/2022	Call with Eric Reubel, Michael Garbe, and Tabish Rizvi regarding due diligence request from KDW.	Investigations	1.0	\$ 625	\$ 625.00
Zhu	10/12/2022	Review Insider Analysis request history and draft email to Tabish Rizvi, Eric Reubel, and Michael Garbe	Business Analysis	0.2	\$ 625	\$ 125.00
Garbe	10/13/2022	Call with Eric to prepare list of additional diligence request to be included in 2004 filing, send email to Lauren with list of items.	Investigations	0.5	\$ 625	\$ 312.50
Garbe	10/13/2022	Call with Lauren and Eric to review items to be included in 2004 filing, discuss Kelley Drye preparation of Objection and Declaration to be prepared by Dundon regarding 9.11.2022 Exhibit review findings, and timing for 2004 and Objection.	Committee Member/Professional Meetings & Communications	0.5	\$ 625	\$ 312.50

Reubel	10/13/2022	Telecon discussion w/ M. Garbe re: additional diligence requests	Committee Member/Professional Meetings & Communications	0.5	\$ 760	\$ 380.00
Reubel	10/13/2022	Telecon discussion w/ M. Garbe and L. Schlüssel re: 9.11.2022 Exhibit review findings, and timing for 2004 and Objection.	Committee Member/Professional Meetings & Communications	0.5	\$ 760	\$ 380.00
Zhu	10/13/2022	Review bank statements submitted by Debtor and compile missing list; email to Michael Garbe, Eric Reubel, and Tabish Rizvi.	Business Analysis	0.5	\$ 625	\$ 312.50
Garbe	10/16/2022	Prepare Objection Declaration related to Share Holder Loan account and Tax Distributions, discuss MKT accounting methodology, Tax Distributions as set forth in Schedule M-2 of tax returns, Dundon's detailed analysis of Exhibit 9.11.2022 prepared by Province and related findings send to Eric for his review of Declaration.	Investigations	4.5	\$ 625	\$ 2,812.50
Reubel	10/16/2022	Receive and revise Reubel Declaration draft	Investigations	1.5	\$ 760	\$ 1,140.00
Garbe	10/16/2022	Call with Eric to discuss preparation MKT Objection Declaration related to Shar Holder Loans and Tax Distributions.	Committee Member/Professional Meetings & Communications	0.2	\$ 625	\$ 125.00
Garbe	10/16/2022	Call with Eric to review MKT Objection Declaration, make changes, prepare Exhibit attachment.	Committee Member/Professional Meetings & Communications	0.3	\$ 625	\$ 187.50
Reubel	10/16/2022	Telecon discussion w/ M. Garbe re: Reubel declaration (.2); follow-up discussion re: same (.3)	Committee Member/Professional Meetings & Communications	0.5	\$ 760	\$ 380.00
Reubel	10/18/2022	Review and review claims for S. Heun and D. Streck	Claims Analysis	0.3	\$ 760	\$ 228.00
Zhu	10/18/2022	Search and review claims register; retrieve claims from Steve Heun and Dave Streck; email to Eric Reubel.	Claims Analysis	0.5	\$ 625	\$ 312.50
Zhu	10/19/2022	Review additional discovery production.	Investigations	0.2	\$ 625	\$ 125.00
Garbe	10/20/2022	Call with Eric to discuss next draft of ER Declaration in support of limited objection.	Plan and Disclosure Statement	0.3	\$ 625	\$ 187.50
Garbe	10/20/2022	Review ER Declaration, prepare next draft of narrative and Exhibit.	Plan and Disclosure Statement	1.9	\$ 625	\$ 1,187.50

Garbe	10/20/2022	Meet with Eric to discuss next draft and make additional revisions to narrative and Exhibit.	Plan and Disclosure Statement	1.0	\$ 625	\$ 625.00
Reubel	10/20/2022	Review second omnibus claims objection [D.I. 426]	Claims Analysis	0.4	\$ 760	\$ 304.00
Reubel	10/20/2022	Further revise declaration draft (1.4); follow-up discussion w/ M. Garbe re: same (.5)	Plan and Disclosure Statement	1.9	\$ 760	\$ 1,444.00
Garbe	10/21/2022	Continue revisions to next draft of ER Declaration and related Exhibit.	Plan and Disclosure Statement	4.8	\$ 625	\$ 3,000.00
Garbe	10/21/2022	Discuss completed next draft of ER Declaration and his comments to that draft.	Plan and Disclosure Statement	0.2	\$ 625	\$ 125.00
Garbe	10/21/2022	Receive additional diligence items including 2012 thru 2017 tax returns, trace amounts from new diligence items to Exhibit 1 of ER Declaration, update Exhibit 1 to include additional diligence items information, send to Eric for his review.	Plan and Disclosure Statement	1.5	\$ 625	\$ 937.50
Reubel	10/21/2022	Telecon discussion w/ M. Garbe re: final declaration draft (.5); circulate to KDW (.1)	Plan and Disclosure Statement	0.6	\$ 760	\$ 456.00
Reubel	10/21/2022	Review committee draft plan objection (1.3); follow-up discussion w/ M. Garbe re: same (.6)	Plan and Disclosure Statement	1.9	\$ 760	\$ 1,444.00
Reubel	10/22/2022	Review September MOR	Business Analysis	0.3	\$ 760	\$ 228.00
Reubel	10/23/2022	Review debtor's third omnibus claims objection [D.I. 443]	Claims Analysis	0.3	\$ 760	\$ 228.00
Reubel	10/23/2022	Review Debtors motion to confirm second amended plan	Plan and Disclosure Statement	0.4	\$ 760	\$ 304.00
Reubel	10/23/2022	Review plan supplement/Piazza consulting agreement term sheet [D.I. 445]	Plan and Disclosure Statement	0.4	\$ 760	\$ 304.00
Garbe	10/24/2022	Call with Eric to discuss next draft of ER Declaration to Limited Objection.	Plan and Disclosure Statement	0.6	\$ 625	\$ 375.00
Garbe	10/24/2022	Research water rights issues in Pahrump Nevada related to FSM's water rights holding, write memo and send to Lauren.	Investigations	0.7	\$ 625	\$ 437.50
Garbe	10/24/2022	Receive and review additional discovery information related to so-called Heritage Membership Flyers for information related to promises or commitments made by FSM concerning time share or other property offers.	Investigations	1.0	\$ 625	\$ 625.00

Reubel	10/24/2022	Attend Hearing	Court Hearings	1.0	\$ 760	\$ 760.00
Reubel	10/24/2022	Receive and review Piazza communications discovery w/ committee members	Investigations	2.2	\$ 760	\$ 1,672.00
Reubel	10/24/2022	Review KDW comments and revise declaration	Plan and Disclosure Statement	0.6	\$ 760	\$ 456.00
Reubel	10/24/2022	Attend to w9/wire instructions for Province	Retention and Fee Applications	0.1	\$ 760	\$ 76.00
Garbe	10/25/2022	Review next draft of ER Declaration related to Limited Objection as prepared by Eric, make changes to narrative and Exhibit 1, send revised draft to Eric for his review.	Plan and Disclosure Statement	4.4	\$ 625	\$ 2,750.00
Reubel	10/25/2022	Review L. Schlusel email re: committee member questions	Investigations	0.2	\$ 760	\$ 152.00
Reubel	10/25/2022	Further revise declaration draft	Plan and Disclosure Statement	0.5	\$ 760	\$ 380.00
Chen	10/26/2022	Discussed initiating research regarding Front Sight's water rights with Eric Reubel and Michael Garbe	Business Analysis	0.5	\$ 370	\$ 185.00
Garbe	10/26/2022	Call with David Chen and Eric to discuss need for research on Front Site Land and Water Rights value.	Investigations	0.5	\$ 625	\$ 312.50
Garbe	10/26/2022	Call with Eric and Lauren to discuss FSM emails concerning promises and commitments related to offer to develop resort as contained in the "Dear Dave" email, back ground and time line issues, and additional discovery items to be requested or received.	Plan and Disclosure Statement	0.7	\$ 625	\$ 437.50
Reubel	10/26/2022	Telecon discussion w/ D. Chen and M. Garbe re: research on Front Site Land and Water Rights value	Investigations	0.5	\$ 760	\$ 380.00
Reubel	10/26/2022	Review 2005 class action complaint, stipulations and judgements	Investigations	2.0	\$ 760	\$ 1,520.00
Reubel	10/26/2022	Discussion w/ L. Schlusel re: Platinum letter, other property issues	Investigations	0.6	\$ 760	\$ 456.00
Reubel	10/26/2022	Telecon discussion w/ M. Garbe and L. Schlusel re: FSM emails concerning resort developments	Plan and Disclosure Statement	0.7	\$ 760	\$ 532.00
Chen	10/27/2022	Conducted research about Front Sight's water rights based on the database in Nevada Division of Water Resources	Business Analysis	2.8	\$ 370	\$ 1,036.00

Chen	10/27/2022	Conducted research about Front Sight's water rights based on the database in Nevada Division of Water Resources	Business Analysis	3.4	\$ 370	\$ 1,258.00
Chen	10/27/2022	Conducted research about Front Sight's water rights based on the database in Nevada Division of Water Resources	Business Analysis	2.4	\$ 370	\$ 888.00
Garbe	10/27/2022	Call with David Chen to discuss partial findings on water rights search and documentation.	Investigations	0.5	\$ 625	\$ 312.50
Reubel	10/27/2022	Receive and review D. Chen research re: water rights	Business Analysis	0.4	\$ 760	\$ 304.00
Reubel	10/27/2022	Telecon discussion w/ Y. Zhu re: development comps in Pahrump	Business Analysis	0.5	\$ 760	\$ 380.00
Zhu	10/27/2022	Call with Eric Reubel regarding research and study of the real estate asset's liquidation value.	Business Analysis	0.4	\$ 625	\$ 250.00
Garbe	10/28/2022	Attend UCC meeting to, discuss depositions, land, water rights, mineral rights, property development and opposition to proposed plan.	Committee Member/Professional Meetings & Communications	0.5	\$ 625	\$ 312.50
Garbe	10/28/2022	Call with Eric, Lauren, and Bob for follow up call on FSM UCC meeting and next steps.	Committee Member/Professional Meetings & Communications	0.3	\$ 625	\$ 187.50
Reubel	10/28/2022	Attend UCC call	Committee Member/Professional Meetings & Communications	1.6	\$ 760	\$ 1,216.00
Reubel	10/28/2022	Telecon discussion w/ M. Garbe and KDW re: UCC strategy	Committee Member/Professional Meetings & Communications	0.3	\$ 760	\$ 228.00
Reubel	10/28/2022	Receive and review preliminary Y. Zhu research re: Spring Mountain development	Investigations	0.5	\$ 760	\$ 380.00
Rizvi	10/28/2022	Participate on committee call about position on plan and disclosure statement	Committee Member/Professional Meetings & Communications	1.6	\$ 760	\$ 1,216.00
Zhu	10/28/2022	Real estate property research for the Pahrump area; email tentative results to Eric Reubel.	Business Analysis	0.5	\$ 625	\$ 312.50
Zhu	10/28/2022	Attend committee call.	Committee Member/Professional Meetings & Communications	1.4	\$ 625	\$ 875.00
Zhu	10/28/2022	Research on nearby resort developments and in particular Spring Mountain Motor Resort	Business Analysis	0.3	\$ 625	\$ 187.50



		Country Club; email Eric Reubel.				
Reubel	10/29/2022	Review second plan supplement re: assumed contracts [D.I. 466]	Claims Analysis	0.3	\$ 760	\$ 228.00
Zhu	10/31/2022	Reach out to Spring Valley Motor Sports Resort & Club for real estate asset valuation research in the Pahrump area.	Business Analysis	0.2	\$ 625	\$ 125.00
Rizvi	11/1/2022	Review materials regarding water and mineral rights under land	Investigations	0.3	\$ 760	\$ 228.00
Rizvi	11/1/2022	Review stipulation and associated summary on ReOrg.com	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Zhu	11/1/2022	Call with Eric Reubel regarding newly submitted documentation of Debtor's mineral and water rights.	Investigations	0.3	\$ 625	\$ 187.50
Zhu	11/1/2022	Review the Britton-Adamo Group appraisal for Front Sight from Jan. 2022 and discuss with Eric Reubel.	Investigations	0.4	\$ 625	\$ 250.00
Zhu	11/1/2022	Attend committee call	Committee Member/Professional Meetings & Communications	1.1	\$ 625	\$ 687.50
Reubel	11/1/2022	Review Debtor's produced documents/materials re: water and mineral rights (.3); follow-up discussion w/ T, Rizvi re: same (.3)	Business Analysis	0.6	\$ 760	\$ 456.00
Reubel	11/1/2022	Analyze the Jan 2022 Britton-Adamo Group FS appraisal (1.2); follow-up discussion w/ Y. Zhu re: same (.2)	Business Analysis	1.4	\$ 760	\$ 1,064.00
Reubel	11/1/2022	Attend UCC call	Committee Member/Professional Meetings & Communications	1.1	\$ 760	\$ 836.00
Reubel	11/1/2022	Review debtor's notice of withdrawal of claim objection [D.I. 471-472]	Claims Analysis	0.1	\$ 760	\$ 76.00
Reubel	11/1/2022	Review UCC notice re: shareholder deposition [D.I. 470]	Investigations	0.1	\$ 760	\$ 76.00
Garbe	11/2/2022	Call with Eric to discuss Declaration and plan for exhibits, receive and review next drafts of Declaration -v2 &v3, make revisions, send to Eric for his review and comment.	Investigations	3.0	\$ 625	\$ 1,875.00
Reubel	11/2/2022	Multiple telecon discussions w/ M. Garbe re: Dundon	Investigations	2.7	\$ 760	\$ 2,052.00

		declaration and plan for exhibits (1.5); receive and review declaration draft (1.2)				
Reubel	11/2/2022	Discussion w/ L. Schlusser re: email production & Dundon objection	Investigations	0.2	\$ 760	\$ 152.00
Reubel	11/2/2022	Review email production of committee members	Investigations	2.5	\$ 760	\$ 1,900.00
Reubel	11/2/2022	Discuss new chart w/ M. Garbe	Investigations	0.2	\$ 760	\$ 152.00
Reubel	11/2/2022	Review draft committee objection	Plan and Disclosure Statement	2.2	\$ 760	\$ 1,672.00
Garbe	11/3/2022	Call with Eric to discuss next draft of Front Sight Management Objection and Declaration, make changes per Lauren's comments to previous draft.	Plan and Disclosure Statement	1.2	\$ 625	\$ 750.00
Garbe	11/3/2022	Receive and review Shareholder's redacted personal tax returns for 2017, 2018, 2019, 2020, trace declared earnings and k1 information to corporate returns and to 9.11.2022 schedule prepared by Debtors.	Investigations	2.0	\$ 625	\$ 1,250.00
Garbe	11/3/2022	Call with Eric to discuss Debtor's 9.11.2022 schedule and differences to Declaration Exhibit 1, prepare next version of Declaration to incorporate Exhibits and additional information related to Shareholder tax returns, language changes and other revisions, send to Lauren with comments.	Investigations	2.0	\$ 625	\$ 1,250.00
Garbe	11/3/2022	Review Objection V5 with Eric, prepare comments for Lauren.	Plan and Disclosure Statement	0.7	\$ 625	\$ 437.50
Reubel	11/3/2022	Telecon discussion w/ M. Garbe re: Debtor's 9.11.2022 schedule	Plan and Disclosure Statement	1.2	\$ 760	\$ 912.00
Reubel	11/3/2022	Further review UCC plan objection V5 (.5); follow-up discussion w/ M. Garbe re: same (.2)	Plan and Disclosure Statement	0.7	\$ 760	\$ 532.00
Reubel	11/3/2022	Review L. Schlusser email re: plan objection (.2); follow-up discussion re: same (.3)	Plan and Disclosure Statement	0.5	\$ 760	\$ 380.00
Reubel	11/3/2022	Review/analyze shareholder personal tax returns	Investigations	1.2	\$ 760	\$ 912.00
Reubel	11/3/2022	Review/analyze 2005 class action and associated orders	Investigations	2.2	\$ 760	\$ 1,672.00

Reubel	11/3/2022	Revise Reubel Declaration (2.0); confer w/ M. Garbe re: same (1.5)	Investigations	3.5	\$ 760	\$ 2,660.00
Garbe	11/4/2022	Finalize Declaration and related exhibits with Eric, send to Lauren with comments, review next draft of Objection in preparation of filing.	Investigations	2.3	\$ 625	\$ 1,437.50
Reubel	11/4/2022	Further review/analysis of committee plan objection	Plan and Disclosure Statement	0.7	\$ 760	\$ 532.00
Reubel	11/4/2022	Further review/analysis of 2005 class action complaint	Investigations	1.5	\$ 760	\$ 1,140.00
Reubel	11/4/2022	Call w/ L. Schluskel re: Reubel declaration	Investigations	0.5	\$ 760	\$ 380.00
Reubel	11/4/2022	Revise Reubel declaration (.5); multiple discussions w/ M. Garbe re: same (1.5)	Investigations	2.0	\$ 760	\$ 1,520.00
Reubel	11/4/2022	Review M. Garbe email re: declaration revisions (.2); follow-up email w/ L. Schluskel (.2)	Investigations	0.4	\$ 760	\$ 304.00
Reubel	11/4/2022	Review S. Heun email & response	Investigations	0.3	\$ 760	\$ 228.00
Reubel	11/4/2022	Review Debtor/LVDF stipulation [D.I. 474]	Claims Analysis	0.3	\$ 760	\$ 228.00
Reubel	11/4/2022	Review stipulation extending UCC plan objection deadline [D.I. 479]	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Reubel	11/5/2022	Review the class action complaint	Investigations	0.5	\$ 760	\$ 380.00
Reubel	11/5/2022	Review UST plan objection [D.I. 475]	Plan and Disclosure Statement	0.8	\$ 760	\$ 608.00
Reubel	11/5/2022	Review debtor's fourth omnibus claims objection [D.I. 477]	Claims Analysis	0.4	\$ 760	\$ 304.00
Reubel	11/5/2022	Review Debtor's amended 4th omnibus claim objection [D.I. 480]; Shareholder's declaration ISO 4th amended omnibus claims objection [D.I. 481]	Plan and Disclosure Statement	0.4	\$ 760	\$ 304.00
Reubel	11/5/2022	Review/analyze Meacher plan objection [D.I. 484]	Plan and Disclosure Statement	1.0	\$ 760	\$ 760.00
Garbe	11/7/2022	Call with Lauren to discuss upcoming deposition of Shareholder, objection filing and related Declaration.	Committee Member/Professional Meetings & Communications	0.1	\$ 625	\$ 62.50
Rizvi	11/7/2022	Review stipulation between LVDF and the debtor resolving LVDF's treatment under the plan	Plan and Disclosure Statement	0.4	\$ 760	\$ 304.00
Rizvi	11/7/2022	Review UCC's objection to the plan and Dundon's declaration in support.	Plan and Disclosure Statement	0.6	\$ 760	\$ 456.00
Rizvi	11/7/2022	Review USTO's objection to the plan	Plan and Disclosure Statement	0.5	\$ 760	\$ 380.00

Reubel	11/7/2022	Review stipulation between LVDF and the debtor resolving LVDF's treatment under the plan	Plan and Disclosure Statement	0.4	\$ 760	\$ 304.00
Reubel	11/7/2022	Review UCC's objection to the plan and Dundon's declaration in support.	Plan and Disclosure Statement	0.6	\$ 760	\$ 456.00
Reubel	11/7/2022	Review USTO's objection to the plan	Plan and Disclosure Statement	0.5	\$ 760	\$ 380.00
Reubel	11/7/2022	Call with Lauren to discuss upcoming deposition of Shareholder, objection filing and related Declaration.	Committee Member/Professional Meetings & Communications	0.1	\$ 760	\$ 76.00
Reubel	11/7/2022	Review R. Lehane email re: settlement	Investigations	0.1	\$ 760	\$ 76.00
Reubel	11/7/2022	Attend to final declaration edits (.2); follow-up discussion w/ L. Schlüssel/M. Garbe re: same	Investigations	0.3	\$ 760	\$ 228.00
Reubel	11/7/2022	Review filed UCC objection // Reubel declaration [D.I. 495-495]	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Reubel	11/9/2022	Review UCC/Debtor stipulation w/r/t shareholder deposition [D.I. 504]	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Reubel	11/9/2022	Review LVDF objection w/r/t shareholder deposition [D.I. 506]	Plan and Disclosure Statement	0.2	\$ 760	\$ 152.00
Reubel	11/9/2022	Analyze Meacher adversary complaint [D.I. 508]	Plan and Disclosure Statement	1.6	\$ 760	\$ 1,216.00
Reubel	11/10/2022	Prepare combined September-October fee application	Retention and Fee Applications	2.0	\$ 760	\$ 1,520.00
Reubel	11/10/2022	Discussion w/ L. Schlüssel re: prairiefire	Investigations	0.1	\$ 760	\$ 76.00
Reubel	11/10/2022	Attend to FS scheduling w/ B. Gyves	Investigations	0.2	\$ 760	\$ 152.00
Reubel	11/11/2022	Telecon discussion w/ B. Gyves and M. Garbe	Investigations	0.6	\$ 760	\$ 456.00
Reubel	11/11/2022	Analyze Fialdowski declaration re: plan voting results	Plan and Disclosure Statement	0.2	\$ 760	\$ 152.00
Reubel	11/11/2022	Debtor's reply to UCC plan objection [D.I. 520]	Plan and Disclosure Statement	0.2	\$ 760	\$ 152.00
Reubel	11/11/2022	Review Shareholder joinder ISO plan confirmation [D.I. 522]	Plan and Disclosure Statement	0.3	\$ 760	\$ 228.00
Reubel	11/11/2022	Review FS DIP joinder ISO plan confirmation [D.I.523]	Plan and Disclosure Statement	0.1	\$ 760	\$ 76.00
Reubel	11/13/2022	Review J. Adams email re: plan voting	Plan and Disclosure Statement	0.2	\$ 760	\$ 152.00
Reubel	11/15/2022	Attend to FS Fee estimate	Retention and Fee Applications	0.3	\$ 760	\$ 228.00
Reubel	11/17/2022	Attend to fee estimate	Retention and Fee Applications	0.5	\$ 760	\$ 380.00
Reubel	11/18/2022	attend confirmation hearing	Plan and Disclosure Statement	2.5	\$ 760	\$ 1,900.00





**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

Case No.: 22-11824-abl Chapter: 11 Hearing Date/Time: 01/9/23 at 9:30 am

Debtor: Front Sight Management LLC

Applicant: Dundon Advisers LLC

Date of Employment: July 29, 2022, effective as of June 15, 2022

Interim Fee Application No. Second and Final

**Amounts Requested:**

**Client Approval:** Yes  No

**Fees** \$268,436.00

**Expenses** \$0.00

**Total** \$268,436.00

**Hours** 392.0

**Blended Rate:** \$684.79

**Fees Previously Requested:** \$114,167.00 **Awarded:** \$114,167.00

**Expenses Previously Requested:** N/A **Awarded:**                     

**Total Previously Requested:** N/A **Awarded:**                     

**Total Amount Paid:** \$114,167.00<sup>1</sup>

I certify under the penalty of perjury that the above is true.

/s/ Eric A. Reubel Date December 12, 2022

<sup>1</sup> Payment of 100% of fees and 100% of expenses (N/A) was received in connection with the order granting Dundon Advisers' Combined First Interim Fee Statement [Docket No. 454]; a first monthly application that paid 80% of requested fees was served on the Reviewing Parties pursuant to the *Order Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses for Professionals* [Docket No. 318].