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UNITED STATES DEPARTMENT OF JUSTICE
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TRACY HOPE DAVIS

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

FRONT SIGHT MANAGEMENT LLC,

Debtor.

Case No: 22-11824-ABL
Chapter 11

Date: January 9, 2023
Time: 9:30 a.m.
Place: Telephonic, Foley Courtroom 1

**UNITED STATES TRUSTEE’S NOTICE OF VOLUNTARY REDUCTION
IN FEES WITH RESPECT TO PROVINCE LLC’S
SECOND AND FINAL FEE APPLICATION**

Tracy Hope Davis, United States Trustee for Region 17, by and through her undersigned counsel, hereby files this *Notice of Voluntary Reduction in Fees* with Respect to the Second and Final Fee Application filed by Province, LLC (“Applicant”) in the above-captioned case (the “Application”). [ECF Nos. 382 and 592 (first interim and second and final, respectively)].

In support, the United States Trustee respectfully represents as follows:

1. The fee applicant bears the burden of proof to show entitlement to the requested fees under 11 U.S.C. § 330. See *In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev'd in part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990 (Bankr. D. Nev. 1990) (“[t]he applicant ... has the burden of proof to show the reasonableness of the fees sought”).

1 2. The United States Trustee has reached an agreement with Applicant to resolve the
2 United States Trustee’s informal objections to the Application prior to the above-captioned
3 hearing. Applicant has consented to a voluntary reduction of \$16,384 in fees instead of filing of
4 a supplement to address various legal service descriptions that, in the United States Trustee’s
5 view, contain vague entries or constitute block billing.
6

7 3. After accounting for Applicant’s voluntary reduction of \$16,384 in fees, the
8 Application requests a total of \$1,241,641.05 in fees and \$2,301.58 in expenses. [*See* ECF Nos.
9 382 and 592]. Considering the voluntary reduction, the United States Trustee does not object to
10 Applicant’s second and final request for fees and expenses.
11

12 Dated: December 23, 2022

TRACY HOPE DAVIS
UNITED STATES TRUSTEE

/s/ Edward M. McDonald Jr.
Edward M. McDonald Jr.
Trial Attorney for the United States Trustee