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

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

<p>11 In re:</p> <p>12 Front Sight Management LLC,</p> <p>13</p> <p>14 Debtor.</p>	<p>Case No. 22-11824-abl</p> <p>Chapter 11</p> <p>Hearing Date: April 13, 2023 Hearing Time: 9:30 a.m.</p>
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17 **STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT**
 18 **RELATES TO CLAIMS 992 AND 1001 FILED BY VINCENT MAYER**

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

23 **RECITALS**

- 24 A. On May 24, 2022, Front Sight Management LLC (the “Debtor”) filed a voluntary
 25 petition for relief under chapter 11 of the Bankruptcy Code, commencing this bankruptcy case.
- 26 B. On December 19, 2022, Claimant filed Proof of Claim 992-1 (“Claim 992”) in the
 27 amount of a \$13,741.60 general unsecured claim. On December 22, 2022, Claimant filed Proof of
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1 Claim 1001-1 (“Claim 1001”) in the amount of a \$13,741.60 general unsecured claim and also
2 named Lisa Mayer as a claimant (though only Claimant signed Claim 1001).

3 C. On February 16, 2023, the Liquidating Trustee filed its eighth omnibus objection to
4 claim [ECF No. 691] (the “8th Omnibus Objection”) pursuant to which the Liquidating Trustee
5 objected to both claims, sought to disallow Claim 992 in its entirety and sought to disallow Claim
6 1001 to the extent it exceeds \$1,345.

7 D. On or around February 23, 2023, Claimant contacted counsel for the Liquidating
8 Trustee and provided additional evidence in support of his claim.

9 E. After good faith discussions between the parties, the Liquidating Trustee has agreed
10 to allow Claim 992 in the amount of a \$12,289.60 general unsecured claim, with Claim 1001
11 disallowed in its entirety.

12 **STIPULATION**

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

- 14 1. The foregoing recitals are incorporated herein in full by this reference.
- 15 2. Claim 992 shall be allowed as a general unsecured claim in the amount of \$12,289.60
16 (the “Allowed Claim”), and disallowed to the extent that it asserts any amount over \$12,289.60.
- 17 3. Claim 1001 shall be disallowed in its entirety.
- 18 4. Except for the Allowed Claim and the right to enforce this Stipulation and the order
19 approving this Stipulation, Claimant shall have no additional claim(s) against the Debtor, its estate,
20 the Liquidating Trust or the Liquidating Trustee arising from or relating to the facts alleged in Claim
21 992 or Claim 1001.
- 22 5. To the extent that the 8th Omnibus Objection relates to Claim 992 or Claim 1001, it is
23 resolved pursuant to this Stipulation.
- 24 6. Upon entry of the order approving this Stipulation, the Court clerk shall be directed to
25 modify and update the claim register in this case to reflect an allowed amount of a \$12,289.60
26 general unsecured claim for Claim 992, and to reflect that Claim 1001 is disallowed in its entirety.

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

4 8. The Bankruptcy Court shall have the exclusive jurisdiction to interpret and enforce
5 this Stipulation and the order approving it.

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7 **THE FOREGOING IS AGREED:**

8 DATED: March 31, 2023

BG Law LLP

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10 By: /s/ Susan K. Seflin

Susan K. Seflin

Jessica S. Wellington

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

15 DATED: March 30, 2023

16
17 By: 

Vincent Mayer, Claimant

CERTIFICATE OF SERVICE

I declare that I am over the age of 18 years and not a party to the within action. I am employed in the County of Los Angeles and my business address is 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367.

On **March 31, 2023**, I served the following document:

STIPULATION RESOLVING EIGHTH OMNIBUS OBJECTION AS IT RELATES TO CLAIMS 992 AND 1001 FILED BY VINCENT MAYER

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

(1) The Court’s CM/ECF List:

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(2) VIA E-Mail:

Vincent Mayer – vmayer45@yahoo.com

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed **March 31, 2023**, at Woodland Hills, California.

/s/ Jessica Studley
JESSICA STUDLEY