

Roman V. Gambourg Esq.
GAMBOURG & READ, P.C.
One Bridge Plaza North, Suite 675
Fort Lee, NJ 07024
Tel: (201) 242-0220
Fax: (212) 937-2117
Mobil: (212) 810-0880
Email: rg@glegalgroup.com
Attorneys for Creditor / Interested Party
Tatiana Sarkisova Firmenich

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEVADA (LAS VEGAS)**

In Re:

Case No. 22-11824-abl

Chapter 11

FRONT SIGHT MANAGEMENT LLC
aka FRONT SIGHT
aka FRONT SIGHT RESORTS
dba FRONT SIGHT FIREARMS TRAINING
INSTITUTE,

**EX PARTE MOTION FOR ORDER
SHORTENING TIME FOR HEARING**

Debtor(s)

Hearing Date: NA

Hearing Time: NA

TATIANA SARKISOVA FIRMENICH, by and through her undersigned counsel, hereby respectfully moves the Court for the entry of an order shortening time for notice and hearing on the Amended Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove that Creditor Tatiana Sarkisova Firmenich is an Innocent Investor fully filed on December 2, 2024. This motion is made pursuant to 11 U.S.C. § 105(a), Federal Rule of Bankruptcy Procedure 9006(c)(1), and Local Rule 9006, and is based upon the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. This is a core proceeding under 28 U.S.C. § 157(b).
3. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

II. RELIEF REQUESTED

4. Movant requests that the Court set a hearing on the Amended Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove that Creditor Tatiana Sarkisova Firmenich is an Innocent Investor on shortened time, specifically on or before April 17, 2025, with objections or oppositions, if any, due by April 16, 2025.

III. BASIS FOR RELIEF

5. Good cause exists for the granting of this motion. The need for expedited consideration arises from the following facts:

- a) The Movant has been enormously prejudiced as an innocent investor due to the wrongful acts and omissions of FRONT SIGHT MANAGEMENT LLC.
- b) The Movant is currently pursuing immigration relief, and the record before the Court—specifically a finding or declaration that she is an innocent investor—will materially support her petition presently under appeal.
- c) The immigration case involves a complex procedural history, and demonstrating her lack of culpability in this matter is essential to securing lawful permanent resident status in the United States.

6. Movant has conferred with or attempted to confer with all interested parties regarding this motion and their positions are as follows:

- FRONT SIGHT MANAGEMENT LLC. - No Position.

IV. NOTICE

7. If this Motion is granted, Movant will serve the Ex Parte Motion for Order Shortening Time for Hearing and the Order Shortening Time on:

- All parties required under Local Rule 2002
- The U.S. Trustee

- Any other party affected by the relief requested

via email, overnight mail, or personal service, as necessary, immediately upon entry of the Order.

V. CONCLUSION

WHEREFORE, Movant respectfully requests that the Court enter an order:

1. Granting this Motion for Order Shortening Time;
2. Setting the hearing on the Ex Parte Motion for Order Shortening Time for Hearing on or before April 17, 2025;
3. Setting the deadline to oppose by April 16, 2025; and
4. Granting such other and further relief as the Court deems just and proper.

Dated: April 11, 2025

Respectfully submitted,

/S/ Roman V. Gambourg

Roman V. Gambourg Esq.
GAMBOURG & READ, P.C.
Attorneys for Creditor
Tatiana Sarkisova Firmenich

LR 9021 CERTIFICATION

In accordance with LR 9021, an attorney submitting this document certifies as follows (check one):

☐ The court has waived the requirement set forth in LR 9021(b)(1).

☐ No party appeared at the hearing or filed an objection to the motion.

☐ I have delivered a copy of this proposed order to all attorneys who appeared at the hearing and opposed the relief, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

☐ I certify that this is a case under chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

Dated: April 11, 2025

GAMBOURG & READ, P.C.

/S/ Roman V. Gambourg

Roman V. Gambourg Esq.
Attorneys for Creditor / Interested Party
Tatiana Sarkisova Firmenich

Roman V. Gambourg Esq.
GAMBOURG & READ, P.C.
One Bridge Plaza North, Suite 675
Fort Lee, NJ 07024
Tel: (201) 242-0220
Fax: (212) 937-2117
Mobil: (212) 810-0880
Email: rg@glegalgroup.com
Attorneys for Creditor / Interested Party
Tatiana Sarkisova Firmenich

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEVADA (LAS VEGAS)**

In Re:

Case No. 22-11824-abl

Chapter 11

FRONT SIGHT MANAGEMENT LLC
aka FRONT SIGHT
aka FRONT SIGHT RESORTS
dba FRONT SIGHT FIREARMS TRAINING
INSTITUTE,

**DECLARATION OF
ROMAN V. GAMBOURG, ESQ.
IN SUPPORT OF EX PARTE MOTION
FOR ORDER SHORTENING TIME**

Debtor(s)

I, Roman V. Gambourg, declare as follows:

1. I am the managing partner of GAMBOURG & READ, P.C., counsel for TATIANA SARKISOVA FIRMENICH, a claimant and creditor in the above-captioned bankruptcy case. I make this Declaration in support of the Ex Parte Motion for Order Shortening Time for Hearing.

2. The underlying motion and request for expedited hearing are of great importance to the Movant, as she has been enormously prejudiced as an innocent investor due to the wrongful acts and omissions of FRONT SIGHT MANAGEMENT LLC.

3. Movant has acted in good faith at all times and is not the subject of any allegations of wrongdoing in connection with the underlying business or bankruptcy

proceedings. She is a victim of fraudulent conduct committed by others, including but not limited to FRONT SIGHT MANAGEMENT LLC.

4. The Movant is currently pursuing immigration relief, and the record before the Court—specifically a finding or declaration that she is an innocent investor—will materially support her petition presently under appeal. The immigration case involves a complex procedural history, and demonstrating her lack of culpability in this matter is essential to securing lawful permanent resident status in the United States.

5. Good cause exists to shorten the time for hearing the underlying motion because further delay will cause continued and irreparable harm to Movant, both financially and in terms of her immigration status.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 11, 2025

/s/ Roman V. Gambourg

Roman V. Gambourg, Esq.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEVADA (LAS VEGAS)**

In Re:

Case No. 22-11824-abl

Chapter 11

FRONT SIGHT MANAGEMENT LLC
aka FRONT SIGHT
aka FRONT SIGHT RESORTS
dba FRONT SIGHT FIREARMS TRAINING
INSTITUTE,

**ORDER SHORTENING TIME
FOR HEARING**

Debtor(s)

The Court, having reviewed and considered the Ex Parte Motion for Order Shortening Time filed by Roman V. Gambourg, of GAMBOURG & READ, P.C., counsel for TATIANA SARKISOVA FIRMENICH, on April 11, 2025, and good cause appearing:

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The hearing on the Ex Parte Motion for Order Shortening Time for Hearing is set for _____ at _____, in Courtroom _____, United States Bankruptcy Court, District of Nevada, located at Foley Federal Building & U.S. Courthouse, 300 S Las Vegas Blvd, Las Vegas, NV 89101.
3. Any opposition must be filed and served no later than _____.
4. Movant must immediately serve this Order and the underlying motion in accordance with applicable rules and file a certificate of service.

5. The Court may modify this order for good cause shown.

IT IS SO ORDERED.

Judge

Submitted by:

GAMBOURG & READ, P.C.

/S/ Roman V. Gambourg

Roman V. Gambourg Esq.
Attorneys for Creditor / Interested Party
Tatiana Sarkisova Firmenich