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Tatiana Sarkisova Firmenich

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

Case No. 22-11824-abl

In Re:

Chapter 11

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

**MOTION TO WITHDRAW EX-PARTE
MOTION TO REOPEN CASE FOR THE
ISSUANCE OF AN ORDER TO
PROVE THAT CREDITOR
TATIANA SARKISOVA FIRMENICH
IS AN INNOCENT INVESTOR**

Debtor(s)

Hearing Date: NA
Hearing Time: NA

Creditor TATIANA SARKISOVA FIRMENICH, by and through her undersigned attorney, Roman V. Gambourg Esq., respectfully moves this Court for an order permitting withdrawal of her previously filed Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove That Creditor TATIANA SARKISOVA FIRMENICH Is an Innocent Investor (the “Motion to Reopen”), and states as follows:

1. On October 30, 2024, Creditor TATIANA SARKISOVA FIRMENICH, through counsel, filed the Motion to Reopen seeking relief from this Court in order to establish her standing and recognition as an innocent investor in connection with the above-captioned bankruptcy proceedings.

2. Since the filing of that Motion, circumstances have materially changed. Specifically, Creditor TATIANA SARKISOVA FIRMENICH has been granted lawful permanent resident status in the United States (her “green card”), which provides her with the immigration relief and protection that formed the basis for filing the Motion to Reopen.

3. In light of this development, the relief sought in the Motion to Reopen is no longer necessary, and Creditor TATIANA SARKISOVA FIRMENICH, through counsel, respectfully requests that her prior motion be withdrawn.

4. Withdrawal of the Motion will not prejudice the Debtor, the Estate, or any creditor, and will promote judicial efficiency by removing from the Court’s docket a matter that no longer requires adjudication.

WHEREFORE, Creditor TATIANA SARKISOVA FIRMENICH, by and through her attorney, respectfully requests that the Court enter an order:

- (a) granting this Motion to Withdraw;
- (b) permitting withdrawal of the previously filed Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove That Creditor TATIANA SARKISOVA FIRMENICH Is an Innocent Investor; and
- (c) granting such further relief as the Court deems just and proper.

Dated: April 6, 2026

Respectfully submitted,

/S/ Roman V. Gambourg

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

UNITED STATES BANKRUPTCY COURT
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In Re:

Case No. 22-11824-abl

FRONT SIGHT MANAGEMENT LLC
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INSTITUTE,

Chapter 11

PROPOSED ORDER

Debtor(s)

Upon consideration of the Motion to Withdraw Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove that Creditor TATIANA SARKISOVA FIRMENICH Is an Innocent Investor (the "Motion to Withdraw"), filed by Creditor TATIANA SARKISOVA FIRMENICH, through her attorney, Roman V. Gambourg Esq., and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. The Motion to Withdraw is GRANTED.
2. The previously filed Ex-Parte Motion to Reopen Case for the Issuance of an Order to Prove that Creditor TATIANA SARKISOVA FIRMENICH is an Innocent Investor is deemed WITHDRAWN.
3. This Order is without prejudice to any future relief sought by Creditor TATIANA SARKISOVA FIRMENICH or any other party in interest.

IT IS SO ORDERED.

Dated: _____

Hon. August B. Landis
United States Bankruptcy Judge

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 6, 2026

GAMBOURG & READ, P.C.

/S/ Roman V. Gambourg

Roman V. Gambourg Esq.
Attorneys for Creditor
Tatiana Sarkisova Firmenich