	Case 1:24-bk-00002 Document No	22 Filed 04/24/24 Page 1 of 3 Docket #0022 Date Filed: 4/24/2024		
1 2 3 4 5 6 7 8 9 10 11 12	CHOI & ITO Attorneys at Law CHUCK C. CHOI (pro hac vice pending) ALLISON A. ITO (pro hac vice pending) 700 Bishop Street, Suite 1107 Honolulu, Hawaii 96813 Telephone: (808) 533-1877 Fax: (808) 566-6900 Email: cchoi@hibklaw.com; aito@hibklaw MCDONALD LAW OFFICE CHARLES H. MCDONALD II (F0494) 2 nd Floor ICC, Room 203 Gualo Rai, Saipan, MP 96950 Telephone: (671) 588-8866 E-Mail: charles@mcdonald.law Proposed Attorneys for Debtor	.com		
13 14 15	and Debtor-in-Possession IN THE UNITED STATES DISTRICT COURT FOR THE NORTHEN MARIANA ISLANDS BANKRUPTCY DIVISION			
 16 17 18 19 20 21 22 23 24 	In re IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC, Debtor and Debtor-in-Possession.	Case No. 24-00002 Chapter 11		
25 26 27 28	1			

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

NOTICE OF INTERIM HEARING ON DEBTOR'S FIRST DAY MOTIONS TO CREDITORS AND OTHER PARTIES IN INTEREST:

On April 19, 2024, Imperial Pacific International (CNMI), LLC, debtor and debtor-in-possession herein (the "Debtor"), filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code. On April 23, 2024, the Debtor filed certain "first day" motions identified below (collectively, the "First Day Motions"). NOTICE IS HEREBY GIVEN that an interim hearing ("Hearing") to consider the First Day Motions, more particularly described herein, shall be held on April 26, 2024, at 8:30 a.m. CHST, in the Courtroom of the Honorable Ramona V. Manglona located at United States District Court for the Northern Mariana Islands, 1671 Gualo Rai Road, Gualo Rai, Saipan, MP 96950. Attendance by creditors and other parties in interest is welcome, but is not required. Any objections to the First Day Motions must be filed prior to the Hearing. The First Day Motions are summarized as follows: Application to Employ Choi & Ito and McDonald Law Office as Co-1. Counsel for the Debtor [Dkt.# 10]. The Debtor seeks authority to employ Choi & Ito as lead bankruptcy counsel and McDonald Law Office as local bankruptcy counsel in this proceeding. 2. Pro Hac Vice Application for Chuck C. Choi, Esq. [Dkt #7] 3. Pro Hac Vice Application for Allison A. Ito, Esq. [Dkt # 8] Application to Employ Michael Chen Law Offices as special litigation 4. counsel for the Debtor [Dkt # 13]. The Debtor seeks authority to employ Michael Chen Law Office as special litigation counsel to the Debtor. 5. Motion for Interim Fee Procedures [Dkt # 9]. The Debtor seeks an order establishing interim fee application and expense reimbursement procedures for professionals. 2

1 2 3 4	6. <u>Motion For Order Authorizing Debtor To Pay Pre-Petition Wages</u> <u>And Other Employment-Related Costs And Expenses (the "Wage Motion")</u> [Dkt. # 11]. The Debtor seeks authority to honor all payroll obligations in the normal course the same as if the bankruptcy had not been filed. This includes authority to pay such things as wages, overtime, salaries, payroll taxes, other payroll deductions and required contributions. The Debtor is <u>not</u> seeking to pay accrued paid time off in this motion.
5 6	The Debtor estimates that the total amount of pre-petition wages and expenses is approximately \$11,200.
7 8 9	7. <u>Motion For Order Authorizing Debtor To Obtain Postpetition</u> <u>Secured Indebtedness [Dkt. ## 12, 15].</u> The Debtor also seeks interim authority to borrow up to \$7 million in debtor-in-possession financing from Loi Lam SIT, including up to \$400,000 on an interim basis. The proposed loan is intended to ensure the Debtor's continued liquidity through July,
10	2024.
11	The First Day Motions, including exhibits and declarations in support thereof, may
12	be obtained from the undersigned counsel or inspected at the office of the Clerk of the
13	Court during normal business hours.
14 15	A further final hearing will be scheduled on the matters listed above except for the
16	Wage Motion. You will be given notice of the final hearing.
17	DATED: Hagåtña, Guam, April 24, 2024.
18	
19	/s/ Charles H. McDonald II CHUCK C. CHOI
20	ALLISON A. ITO
21	CHARLES H. MCDONALD II (F0494)
22	Proposed Attorneys for Debtor and Debtor-in-Possession
23	and Debtor-III-Possession
24	
25	
26	
27	
28	3