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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION**

In Re

**IMPERIAL PACIFIC
INTERNATIONAL (CNMI), LLC,**

Debtor and Debtor-in Possession.

**CASE NO. BK-24-0002
(Chapter 11)**

**JOINDER IN OPPOSITION FILED BY
JUDGMENT CREDITOR JOSHUA GRAY
TO DEBTOR IPI' FIRST-DAY MOTIONS**

COMES NOW, the Law Office of Michael W. Dotts, LLC, (the “Dotts Law Office”), a judgment creditor of the Debtor, Imperial Pacific International (CNMI) LLC, (“IPI”), and joins in the Opposition filed by Judgment Creditor Joshua Gray to Debtor IPI’ First-Day Motions, (ECF 30) (the “Opposition”). As noted in the Opposition, IPI shut down in March 2020. Also as noted in the Opposition, all of IPI’s gaming equipment has been sold to pay creditors. In addition to what the Opposition describes, almost all of IPI’s foreign workers have been repatriated. All construction work stopped on the hotel and there has been no progress on the building for about the last two years. The upper floors of the hotel were not completed and left open to the elements. The power has been off for an extended time and without air conditioners running it is a near certainty that mold has grown throughout the empty casino. There are essentially no more employees, and IPI lacks any



1 business operations earning income that can pay wages or taxes. The First Day Motions should all
2 be denied (except for the *pro hac vice* admission of IPI's latest attorney).

3 The Dotts Law Office does believe that IPI belongs in bankruptcy, but under Chapter 7, not
4 Chapter 11. There is nothing left to reorganize. There is a derelict building that is an eyesore and a
5 potential danger to the community. What is left of IPI should be liquidated under the supervision of
6 the Bankruptcy Court.
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8 Respectfully submitted this 25th day of April 2024.

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10 DOTT'S LAW OFFICE

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12 /s/
13 Michael W. Dotts, Esq.
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