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Attorneys for Debtor and Debtor-in-Possession

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. 24-00002
Chapter 11

**NOTICE OF INTERIM AND FINAL
HEARINGS ON CERTAIN OF DEBTOR'S
FIRST DAY MOTIONS**

Interim Hearing (as to DIP Motion and Motion
for Expense Procedures):

DATE: May 30, 2024
TIME: 8:30 a.m. CHST
JUDGE: Hon. Ramona V. Manglona

Final Hearing (as to Employment Applications,
DIP Motion, Motion for Expense Procedures):

DATE: June 21, 2024
TIME: 8:30 a.m. CHST
JUDGE: Hon. Ramona V. Manglona
[Related to ECF Nos. 7-15, 47, 75]

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**NOTICE OF INTERIM AND FINAL HEARINGS ON CERTAIN OF 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").

The First Day Motions are summarized as follows:

1. Application to Employ Choi & Ito and McDonald Law Office as Co-Counsel for the Debtor ("Bankruptcy Co-Counsel Employment Application") [ECF No. 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. Application to Employ Michael Chen Law Offices as special litigation counsel for the Debtor ("Chen Employment Application") [ECF No. 13]. The Debtor seeks authority to employ Michael Chen Law Office as special litigation counsel to the Debtor.
3. Motion for Interim Fee Procedures [ECF No. 9]. The Debtor seeks an order establishing interim fee application and expense reimbursement procedures for professionals.
4. Motion For Order Authorizing Debtor To Obtain Postpetition Secured Indebtedness ("DIP Financing Motion") [ECF Nos. 12, 15, 47]. 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, 2024.

The First Day Motions, including exhibits and declarations in support thereof, may be obtained from the undersigned counsel or inspected at the office of the Clerk of the Court during normal business hours.

NOTICE IS HEREBY GIVEN that **May 30, 2024, at 8:30 a.m.**, in the Courtroom of the Honorable Ramona V. Manglona located at United States District Court for the

1 Northern Mariana Islands, 1671 Gualo Rai Road, Gualo Rai, Saipan, MP, has been fixed
2 as the date, time and place of the continued interim hearing for consideration of (1) the
3 Motion for Interim Fee Procedures and (2) the DIP Financing Motion. Any objections to
4 the interim relief requested in the two aforementioned motions are due by **May 27, 2024**.

5 Further, **June 21, 2024, at 8:30 a.m.**, at the same location referred to above, has
6 been fixed as the date, time and place of the final hearing for consideration of (1)
7 Bankruptcy Co-Counsel Employment Application; (2) Chen Employment Application;
8 (3) the Motion for Interim Fee Procedures and (4) the DIP Financing Motion. Any
9 objections to the relief requested on a final basis in the four aforementioned motions are
10 due by **June 6, 2024**.

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12 DATED: Honolulu, Hawaii May 23, 2024.

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14 /s/ Chuck C. Choi
15 CHUCK C. CHOI
16 ALLISON A. ITO
17 CHARLES MCDONALD II (F0494)

18 Attorneys for Debtor
19 and Debtor-in-Possession
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