

CHOI & ITO
Attorneys at Law

CHUCK C. CHOI
ALLISON A. ITO
700 Bishop Street, Suite 1107
Honolulu, Hawaii 96813
Telephone: (808) 533-1877
Fax: (808) 566-6900
Email: cchoi@hibklaw.com; aito@hibklaw.com

MCDONALD LAW OFFICE

CHARLES MCDONALD II (F0494)
2nd Floor ICC, Room 203
Gualo Rai, Saipan, MP 96950
Telephone: (866) 967-7567
E-Mail: charles@mcdonald.law

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

AMENDED NOTICE OF FINAL HEARING
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]

88268



**AMENDED NOTICE OF FINAL HEARING 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.

Further, **June 21, 2024, at 8:30 a.m.**, has been fixed as the date, time and place of the final hearing for consideration of (1) Bankruptcy Co-Counsel Employment

1 Application; (2) Chen Employment Application; (3) the Motion for Interim Fee
2 Procedures and (4) the DIP Financing Motion.

3 The deadline for the Debtor to file and serve supplemental briefing and
4 declarations in support of the DIP Financing Motion shall be **June 11, 2024**.

5 The deadline to file and serve any objections to the relief requested on a final
6 basis in the First Day Motions shall be **June 17, 2024**.

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8 DATED: Honolulu, Hawaii May 31, 2024.

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10 /s/ Allison A. Ito
11 CHUCK C. CHOI
12 ALLISON A. ITO
13 CHARLES MCDONALD II (F0494)

14 Attorneys for Debtor
15 and Debtor-in-Possession
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