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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. 24-00002  
(Chapter 11)**

**OPPOSITION TO DEBTOR'S MOTION  
FOR ORDER AUTHORIZING DEBTOR  
TO OBTAIN POSTPETITION SECURED  
INDEBTEDNESS**

Creditor Commonwealth of the Northern Mariana Islands (the "Commonwealth"), by and through its undersigned counsel, Chief Solicitor J. Robert Glass, Jr., hereby submits its opposition to Debtor's Motion for Order Authorizing Debtor to Obtain Postpetition Secured Indebtedness (ECF 12) ("Debtor's Motion for Postpetition Debt") on a final basis.

The Commonwealth filed its Opposition to Debtor's Motion for Postpetition Debt (ECF 84) on May 27, 2024, the deadline set by the Court for the parties to file objections to the interim portion of the Debtor's motions. The Commonwealth objects to Debtor's Motion for Postpetition Debt on a final basis for the same reasons stated in that Opposition. Neither additional time to review Debtor's statements and schedules filed May 23, 2024 (ECF 74) nor the supplemental information regarding the DIP Lender filed June 11, 2024 (ECF 111) has adequately addressed the concerns raised by the Commonwealth's Opposition.

For the foregoing reasons, the Commonwealth hereby renews its objections as stated in



1 its Opposition and requests the Court to deny Debtor's Motion.

2 Respectfully submitted: June 17, 2024

OFFICE OF THE ATTORNEY GENERAL  
EDWARD MANIBUSAN  
ATTORNEY GENERAL

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5 /s/ J. Robert Glass, Jr.  
6 J. ROBERT GLASS, JR. (F0523)  
Chief Solicitor

7 **CERTIFICATE OF SERVICE**

8 I hereby certify that the above and foregoing was electronically filed on June 17, 2024,  
9 with service requested to all parties of record.

10 /s/ J. Robert Glass, Jr.  
11 J. ROBERT GLASS, JR. (F0523)  
Chief Solicitor