Docket #0140 Date Filed: 6/26/2024
SAN NICOLAS LAW OFFICE, LLC JOEY P. SAN NICOLAS, ESQ (F-0342) 3813 Mestisa Ave. Dandan Village, Saipan P.O. Box 505335 Saipan, MP 96950 Telephone: (670) 288-1073 Mobile: (670) 287-1973 Email: jpsn@sannicolaslaw.net  Counsel for Loi Lam Sit  IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS BANKRUPTCY DIVISION
District To F DIVIDION
Description
Debtor and Debtor-in-Possession.  ) SUPPLEMENTAL DECLARATION  ) OF LOI LAM SIT  )  )  )  )
I, LOI LAM SIT, hereby declare under penalty of perjury that:
<ol> <li>I am the proposed lender under the Motion for Order Authorizing Debtor to Incur Post-Petition Secured Indebtedness (the "DIP Financing Motion") which the Court has approved on an interim basis.</li> <li>Except as otherwise indicated, all of the facts set forth in this Declaration are based on my personal knowledge. I am competent to give this testimony.</li> <li>I was born on at Fujian, People's Republic of China. (See attached Exhibit A: Redacted Hong Kong Passport of Loi Lam Sit.)</li> </ol>

- 4. I am a resident and citizen of the Hong Kong Special Administrative Region, People's Republic of China ("Hong Kong").
- 5. I attended elementary school in Hong Kong.
- 6. I attended secondary school, namely the New Method College, in Hong Kong.
- 7. My address in Hong Kong is 5/F, No. 23, Ming Lun Street, To Kwa Wan Kowloon.
- 8. I am currently employed at Top Pride International Limited ("Top Pride"), located in Hong Kong.
- 9. My position at Top Pride is general manager. I also lead the Sales and Purchase Team
- 10. Top Pride specializes in the sale and distribution of beauty and cosmetic products.
- 11. Information on Top Pride may be found at www.toppride.com.hk.
- 12. In addition to my income as general manager of Top Pride, I also receive income from my personal investments into companies listed on the Hong Kong Stock Exchange.
- 13. I also rely on my inerheritance to support my personal and professional livelihoods.
- 14. Although I have invested into Hong Kong companies in the past, I have never invested funds into Imperial Pacific International Holdings, Limited.
- 15. I have never invested funds into Imperial Pacific International (CNMI), LLC.
- 16. I haver never invested funds into Best Sunshine Holdings.
- 17. I have no existing or prior relationship with the above-mentioned companies, including directorships, employment, consultancy roles, or any other form of association.
- 18. I have no prior dealings or transactions with the above-mentioned companies.

- 19. I have no involvement in previous bankruptcy proceedings, either as a creditor, lender, or debtor.
- 20. I have no prior business or personal relationship with Xiaobo Ji or Cui Li Jie.
- 21. Before this bankruptcy was filed I was approached by a personal friend to help Mr. Ji with financing the Debtor's Chapter 11 case to pay expenses like wages for security and to fund the potential settlement with the Commonwealth Casino Commission ("Commission").
- 22. I agreed to use my personal funds in the amount of up to \$7,000,000 USD to help Imperial Pacific International (CNMI), LLC pay the Commission if the Court approves it. I do not object to the debtor's amended motion for DIP Financing in the amount of \$1,000,000 USD.
- 23. Based on the above, I believe that I am a good faith lender under Section 364(e) of the Bankruptcy Code.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24<sup>th</sup> day of June, 2024, Kowloon, Hong Kong.

LOI LAM SIT

I, declare under penalty of perjury that I am currently a resident of the Special Administrative Region of Hong Kong, People's Republic of China. I am fluent in English and Cantonese. That I am currently an official translator for the CNMI Superior Court and have been a translator for at least fifteen (15) years. I have translated from English to Cantonese and from Cantonese to English. I translated this Declaration from English to Cantonese for LOI LAM SIT

both in the presence of his attorney and out of the presence of his attorney at their request. LOI LAM SIT understands the foregoing declaration.

Executed this 24<sup>th</sup> day of June, 2024, Special Administrative Region of Hong Kong, People's Republic of China.

DENNIS TSI

Interpreter/Translator

