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Attorneys for Debtor and Debtor-in-Possession

IN THE UNITED STATES DISTRICT COURT
FOR THE NORHERN MARIANA ISLANDS
BANKRUPTCY DIVISION

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor.

Case No. 1:24-BK-00002

**FIRST INTERIM FEE
APPLICATION OF CHOI & ITO,
AS DEBTOR'S GENERAL
BANKRUPTCY COUNSEL, FOR
THE PERIOD APRIL 18, 2024 TO
OCTOBER 31, 2024; EXHIBIT A;
DECLARATION OF COUNSEL**

Hearing Date and Time

December 13, 2024 9:00 a.m. (ChST)
December 12, 2024 at 1:00 p.m. (HST)
Judge: Hon. Robert J. Faris

**FIRST INTERIM FEE APPLICATION OF CHOI & ITO, AS DEBTOR'S
GENERAL BANKRUPTCY COUNSEL,
FOR THE PERIOD APRIL 18, 2024 TO OCTOBER 31, 2024**



1 Choi & Ito (the “Applicant”), counsel Imperial Pacific International (the
2 “Debtor”), in support of its first interim fee application for the period April 18, 2024, to
3 October 31, 2024, respectfully represents as follows:
4

5 **I. JURISDICTION AND VENUE**

6 This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and
7 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper
8 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

9 This Application is brought pursuant to 11 U.S.C. § 328 and Rule 2002(a)(6) of
10 the Rules of Bankruptcy Procedure.
11

12 **II. BACKGROUND**

13 On April 19, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for
14 relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”)
15 in the United States District Court for the District of the Northern Mariana Islands,
16 bankruptcy division (the “Court”).
17

18 The Debtor is a limited liability company organized under the laws of the
19 Commonwealth of the Northern Mariana Islands (the “Commonwealth”). Its sole
20 member is Best Sunshine International Ltd., a British Virgin Islands corporation. Best
21 Sunshine is owned by Imperial Pacific International Holding Ltd.

22 On or about August 12, 2014, the Debtor, Best Sunshine and the Commonwealth
23 Lottery Commission entered into an exclusive casino license agreement (the “Casino
24 License”) for the island of Saipan which required, among other things, the payment of
25 \$15 million in annual Casino License fees. The Debtor made \$90 million in Casino
26 License fee payments from 2014 to 2019, before the COVID-19 Pandemic.
27
28

1 Notwithstanding the fact that the Debtor was obligated to pay a \$15 million per
 2 annum exclusive Casino License fee to the Commonwealth Treasurer, on December 4,
 3 2015, the Commonwealth enacted Public Law 19-24 which imposed an annual “Casino
 4 Regulatory Fee” on the Debtor of \$3 million due on or before October 1, 2015. The
 5 Debtor made \$15 million in total Casino Regulatory Fee payments from 2015 to 2019.
 6

7 The Debtor successfully operated a casino for approximately four years, until the
 8 COVID-19 Pandemic forced its closure in March, 2020. Hotel construction ceased in
 9 2021. Since then, the Hotel has been open to the elements and is currently in poor
 10 condition. It is estimated that the cost of completing the construction of the Hotel will
 11 be between \$100 million to \$150 million.
 12

13 As of the Petition Date, the Debtor’s major real estate assets consisted of (1) its
 14 casino, which is housed in its hotel building (the “Hotel”), which in turn is situated
 15 primarily on approximately 19,204 square meters of land leased (the “Leasehold
 16 Property”) from the Department of Public Land (“DPL”) pursuant to Lease Agreement
 17 No. LA-15-002S; and (2) the Debtor’s ownership interest in Imperial Pacific Properties,
 18 LLC, which holds a leasehold interest in eight lots adjacent to the Leasehold Property
 19 (the “IPP Interest”, together the “Leased Property”).
 20

21 **III. Status of Bankruptcy**

22 On April 23, 2024, the Debtor filed a joint application to employ Applicant and
 23 McDonald Law Office (“MLO”) as general bankruptcy co-counsel, effective as of the
 24 Petition Date. *See* dkt. # 10.
 25

26 On April 23, 2024, the Debtor filed certain “first day” motions including its:

- 27 1. *Application to Employ Choi & Ito, Attorneys at Law and McDonald*
 28 *Law Office as Co-Counsel for the Debtor* (the “Joint Application”) (ECF 10);

1 2. *Application to Employ Michael Chen Law Offices as special litigation*
2 *counsel for the Debtor* (the “Chen Application”) (ECF 13);

3 3. *Motion for Interim Fee Procedures* (the “Fee Procedures Motion”) (ECF 9); and

4 4. *Motion For Order Authorizing Debtor To Pay Pre-Petition Wages*
5 *And Other Employment-Related Costs And Expenses* (the “Wage Motion”) (ECF 11).

6
7 The Court conducted first day hearings on April 26, 2024. Over the Objection of
8 Creditor Joshua Gray (“Gray”) (ECF 30) and certain creditors (ECF 41)¹ and limited
9 objection by the Office of the U.S. Trustee (the “UST”) (ECF 19), the Court entered a
10 final order on the Wage Motion, and interim orders authorizing the Joint Application,
11 the Chen Application, and the Fee Procedures Motion, all subject to further briefing by
12 the parties and a final hearing. *See* ECF 57.

13
14 On June 28, 2024, the Court entered final orders approving (1) the Joint
15 Application, effective as of the Petition Date; (2) the Chen Application, effective as of
16 the Petition Date; and (3) the Fee Procedures Motion. *See* ECF 146, 149, 151.

17
18 On April 23, 2024, the Debtor filed its *Motion for Order Authorizing Debtor to*
19 *Obtain Postpetition Secured Indebtedness* (“DIP Financing Motion”) (ECF 12, 15). The
20 UST (ECF 19), Gray (ECF 30), and Thomson Creditors (ECF 41) filed statements in
21 response to the DIP Financing Motion. At a hearing held on April 26, 2024, the Court
22 continued the hearing on the DIP Financing Motion. On May 10, 2024, the Debtor
23 submitted a redlined loan term sheet and Debtor in Possession Loan Agreement. *See*
24

25
26 ¹ Joinder to the Gray Opposition was filed by Creditors Artman Corporation, Fujitec
27 Pacific, Inc., GT Building Systems International PTD, Ltd., Hermine Ipwan Islam dba
28 Ipwan Security Services, U.S.A. Fanter Corporation, Ltd., and James Whang dba South
 Pacific Lumber Company (collectively, the “Thomson Creditors”) as ECF 41.

1 ECF 47.

2 On May 14, 2024, the UST appointed a Committee of Unsecured Creditors (the
3 “Committee”) consisting of Hughes Hubbard & Reed LLP, DFK Limited, and Corrado
4 Modica.
5

6 Over objection of the UST (ECF 53, 114), Gray (ECF 86), Thomson Creditors,
7 the Commonwealth (ECF 84) the Committee (ECF 87), Dotts Law Office (ECF 97), the
8 Court entered a First Interim and Second Interim approving the DIP Financing Motion,
9 but granted the lender administrative priority status for the loans. *See* ECF 112 and
10 150. On June 21, 2024, the Court approved, on a final basis, up to \$1.4 million in DIP
11 financing for the Debtor from Mr. Loi Lim Sit. *See* ECF 173.
12

13 On June 15, 2024, the Committee filed separate applications to employ
14 ARENTFOX SCHIFF LLP as general bankruptcy counsel and Chambers Law LLC as
15 local counsel for the Committee, respectively. *See* ECF 115 and 133. On July 8, 2024,
16 the Court approved the employment of Arent Fox as general bankruptcy counsel and
17 Chambers Law as local counsel for the Committee, respectively. *See* ECF 162, 163.
18

19 On May 13, 2024, Creditor Joshua Gray filed a motion for relief from the
20 automatic stay to sell certain personal property of the Estate, and to proceed with a
21 motion for attorneys’ fees. *See* ECF 48-51. On May 24, 2024, the Debtor filed an
22 opposition to the Gray Stay Motion. *See* ECF 78. On July 10, 2024, the Court entered
23 a memorandum decision denying the Gray RFS Motion. *See* ECF 165.
24

25 On May 17, 2024, Genc Plaintiffs filed a *Motion for Relief from the Automatic*
26 *Stay* (the “Genc Stay Motion”) to permit the District Court to hear Genc Plaintiffs
27 Second Motion for entry of default judgment (and not to execute on any such
28

1 judgment). *See* ECF 68, 69. On May 13, 2024, the Debtor filed a statement of position
2 on the Genc Stay Motion. *See* ECF 99. On June 1, 2024, a stipulation between the
3 Genc Plaintiffs and Debtor regarding relief from the automatic stay was entered. *See*
4 ECF 102.
5

6 On May 22, 2024, the Debtor filed a *Motion for Relief from Automatic Stay to*
7 *pursue Appeal* before the 9th Circuit. *See* ECF 71-72. Over opposition of Gray (ECF
8 113), the Court granted the Debtor's motion for relief from stay. *See* ECF 144.
9

10 On May 23, 2024, the Debtor filed its 444-page *Schedules and Statement of*
11 *Financial Affairs*. *See* ECF 74.

12 On May 29, 2024, the UST conducted the Debtor's meeting of creditors. Mr. Chi
13 appeared telephonically on behalf the Debtor. The meeting lasted approximately three
14 (3) hours and was closed by the UST.

15 On June 20, 2024, the Commonwealth filed a *Motion to Convert Case From*
16 *Chapter 11 to 7* (the "Conversion Motion"). *See* ECF 129. The UST filed a statement
17 in support of the Conversion Motion. *See* ECF 138, 167. The Committee (ECF 155)
18 and the Debtor (ECF 158) opposed the Conversion Motion. At a hearing held on
19 August 14, 2024, the Court denied the Conversion Motion. *See* ECF 195.
20

21 On August 10, 2024, the Debtor filed a *Motion to Approve Bid Procedures for*
22 *Sale of Substantially All of the Debtor's Assets and Related Relief* ("Bid Procedures
23 Motion"). *See* dkt. # 182. Six responses were filed in response to the Bid Procedures
24 Motion, including responses filed by the Commonwealth (ECF 207), Gray (ECF 208,
25 215, 257), the Committee (ECF 219, 250). On September 26, 2024, the Debtor filed its
26 Omnibus Reply to the various responses to the Bid Procedures Motion. *See* dkt. # 223,
27
28

1 263.

2 On August 10, 2024, the Debtor filed its *Motion for Order Authorizing the*
3 *Assumption of Nonresidential Real Property Lease [Department of Public Lands]*
4 (“Motion to Assume DPL Lease”). See ECF 183. On September 6, 2024, the Debtor
5 and the Commonwealth filed a Stipulation Regarding Briefing Schedule on the Motion
6 to Assume DPL Lease. See ECF 220. At a hearing held on October 1, 2024, the Court
7 vacated the briefing and the previously-set November 20, 2024 hearing on the Motion
8 to Assume DPL Lease. See ECF 272.

9 On September 6, 2024, the Debtor filed an *Application to Employ Keen-Summit*
10 *Capital Partners LLC as Real Estate Brokers to Debtor* (the “Realtor Application”).
11 See ECF 222. Three responses were filed in response to the Realtor Application, from
12 the UST (ECF 225), the Committee (ECF 244), and Gray (ECF 257).

13 On September 23, 2024, the Committee filed an application to employ Intrepid
14 Investment Bankers LLC as Investment Banker Effective as of September 22, 2024 (the
15 “Investment Banker Employment Application”). See ECF 251. In the Investment
16 Banker Employment Application, the Committee argued that the Debtor “[b]y treating
17 the assets merely as real estate . . . deters potential buyers in the gaming and gambling
18 industry from submitting bids, thereby missing opportunities to capture the cumulative
19 value of the assets as a casino hotel.” See ECF 251 at 4.

20 Three objections were filed in response to the Investment Banker Employment
21 Application, including responses filed by the UST, the Debtor, and Gray. See ECF
22 260-262.

23 At a hearing held on October 1, 2024, the Court denied the Bid Procedures
24
25
26
27
28

1 Motion and the Realtor Application, and approved the Investment Banker Employment
 2 Application. At the conclusion of the hearing, the Debtor requested the Court set a
 3 status hearing on Intrepid's progress. The Court scheduled a status conference for
 4 November 6, 2024.
 5

6 On October 19, 2024, Judge Manglona issued her *Memorandum of Decision*
 7 *Denying Bid Procedures Motion, Granting Intrepid Application, and Staying Keen-*
 8 *Summit Application*, and issued an Order of Self-Recusal in the main Chapter 11 case.
 9 See ECF 281, 282.
 10

11 **III. SERVICES PROVIDED DURING PERIOD**

12 The legal services rendered by Applicant for the period April 18, 2024 through
 13 October 31, 2024 ("Application Period"), are itemized in the invoices which are attached
 14 as Exhibit "A" hereto and incorporated herein by reference.

15 Applicant requests approval for fees in the amount of \$248,492.06 for the
 16 Application Period (including \$11,182.06 Hawaii general excise tax) computed as set
 17 forth and explained in Exhibit A. Applicant also incurred \$2,182.93 in actual and
 18 necessary expenses as set forth and explained in Exhibit A.
 19

20 As of the date of this Application, Applicant has received \$102,931.90 in fees, and
 21 \$838.94 in expenses on account of its April-May, and June, 2024 invoices pursuant to
 22 the interim fee procedures order in place in this case.
 23

24 During the Application Period, Applicant assisted the Debtor by providing services
 25 in the following categories:

- 26 a. Administration (\$33,880.00). Services in this category included:
- 27 • Advice re operating in chapter 11 and administrative
 - 28 matters.

- Assisted Debtor with preparing documents for initial debtor interview (“IDI”) with the UST; attended IDI and meeting of creditors and provided requested information to UST.
- Prepared Schedules and SOFA.
- Advised Debtor regarding authorized transactions.
- Attended first meeting of creditors.
- Assisted Debtor with preparation of monthly operating reports.
- Assisted in opening new DIP accounts.
- Assisted Debtor with issues procuring insurance.
- Analyzed motions filed by Clear Management, and prepare opposition to same.
- Assisted Debtor with periodic report.
- Assisted Verita regarding information requests.

b. First Day Motions and DIP Financing (\$37,425.00). Services in this category included:

- Prepared and obtained court approval of the following First Day Motions:
 - The Fee Procedures Motion
 - The Wage Motion
 - DIP Financing Motion
- Analyzed filings by UST, Gray, Commonwealth and Committee re First Day Motions; and prepare omnibus replies to same.
- Attended hearings on First Day Motions, and prepared interim and final orders approving same.
- Worked on DIP credit agreement.
- Analyzed further oppositions to DIP Financing Motion,

- Attended hearings on the DIP Financing Motion, and prepared order approving same.

c. Employment (\$22,260.00). Services in this category included:

- Prepared and obtained court approval of the following employment applications:
 - Application to Employ Choi & Ito, Attorneys at Law and McDonald Law Office as Co-Counsel for the Debtor
 - The Application to Employ Michael Chen Law Offices as special litigation counsel for the Debtor
- Communicated with client regarding employment of collection counsel.
- Researched KCC / Verita as potential claims and noticing agent.
- Reviewed Joint Application regarding KCC employment
- Prepared interim fee statements per order authorizing interim fee procedures.
- Prepared Realtor Application.
- Analyzed filings by UST, Gray, Commonwealth and Committee re Realtor Application; communicated with client and Keen regarding responses to Realtor Application, and prepare omnibus replies to same.
- Analyzed Investment Banker Application, and drafted opposition to Investment Banker Application.
- Reviewed interim statements of KCC and Committee Counsel.

d. Creditors and Claims (\$43,770.00) Services in this category included:

- Respond to various inquiries from creditors regarding case status and their respective claims.

- Attended meeting of creditors.
- Advised the Debtor regarding various creditors' liens rights
- Communicated with DOL regarding receivership status, and analyzed stipulation for relief from stay with DOL
- Researched Gray and Fanter cases regarding prepetition litigation status.
- Analyzed Genc Stay Motion, and prepared Debtor's position statement re same.
- Worked with Genc on stipulation regarding extent and scope of relief from stay.
- Prepared motion for relief from automatic stay to proceed with appellate proceeding before 9th Circuit, analyzed Gray's opposition, and filed response re same. Attended hearing on Debtor's motion for relief from automatic stay.
- Analyzed motion to excuse compliance filed by Clear Management (Receiver). Prepared opposition to same and read Clear Management's reply. Attended hearing on Clear's motion to excuse compliance.
- Analyzed Commonwealth's Conversion Motion.
- Prepared opposition to Conversion Motion, analyzed Commonwealth's reply and attended hearing on motion to convert case.
- Analyzed Gray's initial motion for relief stay. Prepared opposition Gray's initial motion for relief stay, analyzed Gray's reply and attend hearing.
- Communicated with Committee counsel regarding case.
- Communicated with Gray' counsel regarding litigation and deposition of DIP lender.

e. Casino License Matters (\$9,210.00) Services in this category included:

- Communicated with client regarding casino license issues.

- Analysis of Casino License Agreement and amendments.
- Communicated with UST regarding casino license issues.

f. Asset Disposition, Plan and Disclosure Statement (\$64,335.00)

Services in this category included:

- Advised client regarding plan and sale options.
- Calls with Keen-Summitt regarding potential retention and due diligence.
- Communicated with client regarding asset disposition.
- Prepared stalking horse term sheet, communicated with client re same, and negotiated with stalking horse bidder's counsel re same.
- Prepared Bid Procedures Motion.
- Analyzed six responses filed in response to the Bid Procedures Motion, including responses filed by the Commonwealth (ECF 207), Gray (ECF 208, 215, 257), the Committee (ECF 219, 250).
- Prepared Debtor's Omnibus Reply to the various responses to the Bid Procedures Motion. *See* ECF 223, 263.
- Analyzed title reports for Debtor's and IPP real property and prepared summary regarding same.
- Prepared purchase and sale agreement between the Debtor and Sit; negotiated with Sit re same.
- Prepared Motion to Assume DPL Lease, and stipulated briefing schedule re same with Commonwealth.
- Assisted client with compiling due diligence materials for Keen-Summit.
- Communicated with Committee Counsel regarding sale matters.

g. Litigation (\$26,430.00) Services in this category included:

- Advised client regarding various litigation matters
- Analyzed pending litigation in Commonwealth and 9th Circuit.
- Review background in contempt proceeding.
- Analyzed Gray’s Motion for relief from stay, prepared opposition to same.
- Analyzed Gray’s response, and attend hearing re same.

IV. FEES REQUESTED

Applicant requests approval for fees in the amount of \$248,492.06 for the Application Period, including \$11,182.066 in Hawaii general excise tax computed as set forth and explained in Exhibit “A.” Applicant also incurred \$2,182.93 in actual and necessary expenses as set forth and explained in Exhibit “A.”

Bankruptcy Code section 331 authorizes this Court to allow interim compensation to professionals employed “not more than once every 120 days after an order for relief under this title” 11 U.S.C. § 331.

Bankruptcy Code section 330(a)(1) authorizes the Court to award reasonable compensation and reimbursement for actual, necessary expenses to a professional. 11 U.S.C. § 330(a)(1). Bankruptcy Code section 330(a)(3) provides:

(3) In determining the amount of reasonable compensation to be awarded . . . the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

(A) the time spent on such services;

(B) the rates charged for such services;

1 (C) whether the services were necessary to the administration of, or
2 beneficial at the time at which the service was rendered toward the
completion of, a case under this title;

3 (D) whether the services were performed within a reasonable amount
4 of time commensurate with the complexity, importance, and nature of
5 the problem, issue, or task addressed;

6 (E) with respect to a professional person, whether the person is board
7 certified or otherwise has demonstrated skill and experience in the
bankruptcy field; and

8 (F) whether the compensation is reasonable based on the customary
9 compensation charged by comparably skilled practitioners in cases
10 other than cases under this title.

11 11 U.S.C. § 330(a)(3).

12 As detailed in Exhibit “A” hereto and the LBR 2016-1b Summary Sheet filed
13 herewith, the services provided by Applicant during the Application Period were
14 provided at a blended hourly rate of approximately \$376.47 by the Applicant’s attorneys.
15 Applicant submits that the hourly rates for services performed by its attorneys, in this
16 case, are reasonable. These rates are the same as are charged to non-bankruptcy clients
17 by Applicant and are consistent with the rates approved by other Bankruptcy Courts in
18 cases that were pending during the periods for which compensation is requested.
19

20 No agreement or understanding exists between the Applicant and any other person
21 regarding a division of any compensation to be received for services performed in
22 connection with this case.
23

24 WHEREFORE, Applicant prays that the Court enter an order: (a) allowing
25 Applicant, interim fees in the amount of \$248,492.06 (including \$11,182.06 in Hawaii
26 general excise tax), and reimbursement of expenses in the amount of \$2,182.93, for
27 services provided during the Application Period, or such other amounts as the Court shall
28

1 deem fair and reasonable; and (b) granting such other relief as the Court deems fair and
2 just.

3 DATED: Honolulu, Hawaii, November 6, 2024
4

5 /s/ Chuck C. Choi
6 CHUCK C. CHOI
7 ALLISON A. ITO
8 Attorney for Debtor and
9 Debtor-in-Possession
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EXHIBIT A

COSTS ADVANCED
(Client Matter# 1815-00)

Chuck C. Choi
Allison A. Ito

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Honolulu, Hawaii 96813

CHOI & ITO

ATTORNEYS AT LAW

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-00

INVOICE NO: 24959

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
05-09-24	Lexis Nexus Research		282.22
05-24-24	Amendment to list of Matrix		34.00
05-31-24	Photocopies		113.80
	Photocopies		108.60
	TOTAL EXPENSES		<u>\$538.62</u>

TOTAL CURRENT WORK

\$538.62

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-00

INVOICE NO: 24984

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
06-06-24 Lexis Nexis Research			263.72
06-30-24 Photocopies			36.60
TOTAL EXPENSES			<u>\$300.32</u>

TOTAL CURRENT WORK

\$300.32

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-00

INVOICE NO: 25003

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
07-11-24 Lexis Nexis Research			258.23
07-31-24 Photocopies			7.20
08-01-24 Lexis Nexis Research			240.70
08-31-24 Photocopies			8.80
TOTAL EXPENSES			<u>\$514.93</u>

TOTAL CURRENT WORK

\$514.93

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-00

INVOICE NO: 25036

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00 \$0.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
09-12-24 Lexis Nexis Research			72.79
09-24-24 PACER			76.10
PACER			22.80
TOTAL EXPENSES			<u>\$171.69</u>

TOTAL CURRENT WORK

\$171.69

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-00

INVOICE NO: 25055

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
09-30-24	Photocopies		2.40
10-03-24	Lexis Nexis Research		654.97
	TOTAL EXPENSES		<u>\$657.37</u>

TOTAL CURRENT WORK

\$657.37

**ADMINISTRATIVE
(Client Matter# 1815-01)**

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-01

INVOICE NO: 24956

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS
04-18-24		
CCC	E-mails with Chen and McDonald re communications with CCC and Automatic stay.	0.50
04-19-24		
CCC	E-mail re calendaring and matters (.20); call with UST re background (.40); confer with AAI re deadlines and to do list (.10); prepare chapter 11 memo for DIP (1.30); prepare e-mail to client re housekeeping issues (.20).	2.20
04-21-24		
CCC	Review news articles (.10); conference call with team re bankruptcy issues (1.10).	1.20
AAI	Read e-mails from Chen and McDonald with comments to the interim fee procedures motion and read information from Chen regarding the employment application (.10); video conference with CCC and client regarding first day motions and IDI (1.10); review updated title reports (.20).	1.40
04-22-24		
AAI	Annotate plat map (.20); analyze various property leases and prepare lease matrix (1.30).	1.50
CCS	Input employees and various creditors into schedules.	3.00
04-23-24		
CCC	Review extension request and e-mail re calendar (.10); call with appraiser (.50); review FTI solicitation and e-mail client re update (.80).	1.40
AAI	Work on schedules E/F (.40); finalize EP motion for extension of time to file case opening documents (.20); revise master mailing	2.30

CHOI & ITOPage: 2
05 -31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

lists for service via mail and via e-mail (.70); draft real property questionnaire for leased property from DPL and e-mail client re same (.60); e-mail client regarding reporting requirements and banking matters(.40).

CCS	Input employees and various creditors into schedules.	1.50
04-24-24		
CCC	E-mails with UST re 341 meeting and housekeeping issues and forward to client.	0.20
AAI	Follow up regarding 341 meeting, extension of deadline to file case opening documents, and various case opening matters (.20); read and respond to e-mail from McDonald regarding creditors matrix (.10); telephone call with Flores regarding DIP account opening issues (.10).	0.40
04-25-24		
CCC	Review e-mail from UST re notice of case (.10); review and respond to e-mails re insurance and ID (.20); review proposed Notice of commencement and related e-mails (.20); ; e-mails with client re insurance issues (.10).	0.60
AAI	Follow up with insurance agent regarding CGL (.20); e-mails with UST regarding DIP account (.20); e-mails with client regarding Bank of Saipan contact information (.20); review proposed form of notice of ch. 11 case and comment re same (.30); e-mail UST regarding lease with DPL and due date for rent (.20); e-mails with McDonald's office regarding notice of chapter 11 case and coordinate service (.30).	1.40
CCS	Input employees and various creditors into schedules.	1.00
04-26-24		
CCC	Review e-mail to McDonald office re motion re extension of deadline to file schedules and confer with AAI re insurance broker; review follow up e-mails re broker.	0.20
AAI	Call with insurance broker and e-mail additional information to McDonald (.30); prepared proposed order granting ex parte motion to extend time to file case opening documents (.30).	0.60

CHOI & ITOPage: 3
05-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

CCS	Input employees and various creditors into schedules.	0.70
04-29-24		
CCC	E-mail with McDonald re CGL policy payment and review AAI e-mail (.10); conference call with client and team re litigation and housekeeping issues (1.00); e-mails with client and UST re DIP account and insurance (.10).	1.20
AAI	Further work on schedules A/B and statement of financial affairs (.60); read e-mails from UST office regarding bank eligibility to open DIP accounts (.20); read e-mail quote and e-mail client comments re same (.20); video conference with CCC, McDonald and client regarding initial debtor interview (.40).	1.40
CCS	Input employees and various creditors into schedules.	1.00
04-30-24		
CCC	Review and forward UST e-mail re insurance and e-mails re DIP account (.10); participate in Initial Debtor Interview (1.60); prepare follow up e-mail re same (.10); prepare e-mail to counsel for carrier re further questions (.10).	1.90
AAI	Review materials from client (.10); e-mail Flores regarding IDI materials (.20); read e-mail from Ching regarding insurance (.10); telephone call with Flores regarding prospective banks for the Debtor to open DIP accounts (.20); attend IDI (1.90).	2.50
CCS	Input employees and various creditors into schedules.	1.00
05-01-24		
CCC	Review e-mail exchange with Saipan FHB re questions for DIP account.	0.10
AAI	Respond to inquiries from FHB in connection with setting up DIP account (.40); correspondence with AXOS bank regarding qualifications for DIP account (.20); review additional documents from client for UST (.30).	0.90
05-02-24		
CCC	Draft e-mail to FHB re DIP account and gaming operation.	0.20

CHOI & ITOPage: 4
05-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

AAI	Revise designation of responsible individual and e-mail Chi re same.	0.10
05-03-24		
AAI	Further work on Schedule E/F (.70); telephone call with AXOS Bank regarding opening DIP account (.30); review additional information from AXOS Bank regarding DIP account (.20).	1.20
05-04-24		
AAI	Review docket; read e-mail from Verbrugge on interim orders and e-mail McDonald re same.	0.20
05-06-24		
CCC	E-mail with FHB and UST; e-mail client re DIP account (.10); follow up e-mails with Chi re IDI issues (.10).	0.20
05-07-24		
CCC	Call with appraiser re status and timing and e-mail re same; e-mail with UST re status of Insurance.	0.10
05-08-24		
CCC	E-mails with client re IDI requirements.	0.10
AAI	Listen to voicemail from UST regarding creditor inquiry and follow up with client re same.	0.10
05-09-24		
AAI	Work on schedules (.70); read various e-mails from McDonald regarding insurance and read insurance quote (.10).	0.80
05-10-24		
AAI	Work on schedules EF and SOFA.	1.10
CCS	Work on obtaining addresses for schedule F creditors.	2.50
JLC	Work on obtaining addresses for creditors.	3.00
05-13-24		
CCC	E-mails with McDonald re meeting and follow up with AAI.	0.10
AAI	Review read employment agreement (.10); review comments from client regarding real property questionnaire and revise same (.20);	0.50

CHOI & ITOPage: 5
05 -31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

read e-mail from client regarding IDI documents, compare against IDI notes and e-mail client for additional documents (.20).

CCS Work on obtaining addresses for schedule F creditors. 5.00

JLC Continue address search for creditors. 1.00

05-14-24

AAI Read audited 2021 financials (.20); revisions to Schedules E/F (2.10). 2.30

CCS Work on obtaining addresses for schedule F creditors & importing to best case. 2.50

JLC Continue creditor address search. 1.00

05-15-24

CCC Review Tipples e-mails and forward internally. 0.10

AAI Further revisions to Schedules D-H and Statement of financial affairs and e-mail draft to client. 1.80

05-16-24

CCC Review orders re hearings and scheduling (.10); review draft schedules and SOFA; conference call with team re same (1.50); review schedule and e-mail re follow up items (.10) . 1.70

AAI Video conference with CCC, McDonald, and client regarding schedules and statement of financial affairs (1.50); review bank statements from client (.20); further revisions to schedules and statement of financial affairs per call (.70); follow up e-mail to client summarizing action items (.20). 2.60

05-20-24

AAI Read materials from client and revise schedules and SOFA in accordance with documentation. 3.20

CCS Compare and insert addresses client found into schedule F. 1.50

CHOI & ITOPage: 6
05-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

05-21-24

CCC Confer with AAI re first day hearings that court dropped, review minutes and revise communications to chambers; review response (.50); review draft schedules (.40); conference call with client re schedules and strategy (1.70). 2.60

AAI Revise schedules and statement of financial affairs (3.20); e-mail with courtroom deputy confirming scheduling of the continued hearing on pending first day motions (.10); work on operating report (.70); videoconferencing with CCC, McDonald and client regarding order to show cause and schedules and statement of financial affairs (1.80). 5.80

CCS Change employees in schedule F consideration to "Accrued Leave". 3.00

05-22-24

CCC Call with client and AAI re schedules and SOFA. 0.70

AAI Revisions to Schedule F per clients comments and per dkt 319 regarding distributions made by receiver (3.40); video conference with CCC and client regarding revised schedules and statement of financial affairs (.70); further revise Schedule F to reflect creditors with unliquidated claims (1.70); e-mails with client re same (.10); e-mail McDonald regarding administrative items and mailing notice of commencement of case (.10); quality control schedules and statement of financial affairs for electronic submission (.30); prepare creditor matrix with additional 199 creditors for electronic upload (.30); gather IDI materials (.80). 7.40

05-24-24

CCC Review proposed notice of various matters. 0.10

AAI E-mail Ordubegian regarding 1st day motions and continued hearing and read e-mail from Committee Counsel regarding potential noticing & claims agent and research proposed Committee's proposed noticing agent (.10); e-mail Reynoso regarding notice of commencement of case (.10). 0.20

05-26-24

CCC Prepare summary of events. 1.00

CHOI & ITOPage: 7
05-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24956

05-27-24	AAI	Video conference with CCC, McDonald and client regarding 341 preparations.	2.30	
05-28-24	CCC	Call with client and team re plan and asset issues.	1.00	
	AAI	Read e-mail from client regarding asset disposition and sale potential (.10); review pro hac applications for committee counsel and proposed orders re same (.10); video conference with CCC, McDonald and client regarding 341 meeting debrief and next steps (1.00).	1.20	
05-30-24	CCC	E-mails with Chi re payments out of DIP and administrative issues.	0.10	
	AAI	Work on operating report (.80); read e-mail from client regarding accounts payable (.10).	0.90	
05-31-24	AAI	Further work on attachments to operating report.	1.20	
		SUB TOTAL	90.50	\$24,235.00
		FEE SUMMARY:		
	ATTORNEY	HOURS	RATE	TOTAL
	Chuck C. Choi	17.50	\$450.00	\$7,875.00
	Allison A. Ito	45.30	\$300.00	\$13,590.00
	Clayrissa C Souza	22.70	\$100.00	\$2,270.00
	Jennifer Lee Czerwinski	5.00	\$100.00	\$500.00
		STATE TAX		<u>1,141.95</u>
		TOTAL FEES		\$25,376.95

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05 -31-24

Imperial Pacific International (CNMI) LLC
Administrative

ACCOUNT NO: 1815-01
INVOICE NO: 24956

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$25,376.95

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-01

INVOICE NO: 24985

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS
06-03-24		
CCC	Review Committee recommended contract for KCC and confer with AAI.	0.20
AAI	Read KCC proposal to provide agent services (.20); read and respond to e-mail from bookkeeper regarding reports for operating report and tracking of prepetition liabilities (.10).	0.30
06-04-24		
CCC	Review e-mail exchanges re MOR information.	0.10
06-06-24		
AAI	Video conference with CCC, McDonald and client re DIP Financing and reorganization plan consideration.	1.50
06-07-24		
AAI	Read motion to excuse compliance with Section 543 filed by Clear Management (.20); read motion for order approving report and accounting filed by Clear Management (.20); read e-mails from Song and CCC regarding stipulating to lift stay regarding receivership in DOL matter (.10).	0.50
06-08-24		
CCC	Review motions filed by Clear re turnover.	0.40
06-12-24		
CCC	Review April financials.	0.10
AAI	Review and comment on draft P&L and balance sheet.	0.20

CHOI & ITOPage: 2
06-30-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 24985

06-13-24	AAI	Read and respond to e-mail from client regarding operating report and find requested documents for client and transmit same.	0.10
06-17-24	AAI	Read e-mails from McDonald and appraiser and read e-mail from Poon regarding orders.	0.10
06-18-24	AAI	Follow up e-mail to Reyes for copy of the insurance certificate.	0.10
	AAI	Follow up with client regarding insurance certificate (.10); e-mail UST regarding requested information (.20).	0.30
06-19-24	AAI	Read e-mail from insurance agent and e-mail Chi re same.	0.10
06-20-24	CCC	Confer with AAI re insurance certificate and MOR; review e-mails re same and policy (.10); review certificate and e-mails with NJV re insurance (.10).	0.20
	AAI	Work on operating report (2.20); video conference with client regarding draft balance sheet (.50); review certificate from Insurance Agent and e-mail UST re same (.10); read e-mail regarding motion to convert to chapter 7 (.20).	3.00
06-23-24	CCC	Review e-mails and attachments re MOR and insurance denials.	0.10
06-24-24	CCC	Review UST statement re dismissal.	0.20
	AAI	E-mails with client regarding April operating report (.20); incorporate comments and finalize operating report for electronic submission (.20).	0.40
06-25-24	AAI	Research background of realtor proposed by ArentFox (.20); e-mail Wong with copy of general liability insurance slip (.10).	0.30
06-26-24	CCC	Multiple e-mails with client and UST re policies and review and forward same.	0.20

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06 -30-24

Imperial Pacific International (CNMI) LLC
Administrative

ACCOUNT NO: 1815-01
INVOICE NO: 24985

SUB TOTAL			8.40	\$2,745.00
FEE SUMMARY:				
ATTORNEY	HOURS	RATE	TOTAL	
Chuck C. Choi	1.50	\$450.00	\$675.00	
Allison A. Ito	6.90	\$300.00	\$2,070.00	
STATE TAX				<u>129.34</u>
TOTAL FEES				\$2,874.34
TOTAL EXPENSES				<u>\$0.00</u>
TOTAL CURRENT WORK				\$2,874.34

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-01

INVOICE NO: 25010

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS
07-01-24		
AAI	Work on operating report (1.20); read and respond to e-mail from Glass regarding tax (.10).	1.30
07-02-24		
CCC	E-mails with client re insurance denials.	0.10
AAI	Read and respond to e-mail from Chi regarding insurance coverage denial.	0.10
07-15-24		
AAI	Review financials from client and e-mail client questions re same.	0.20
07-16-24		
AAI	Read correspondence from Dotts Law office regarding invoices regarding document retention and e-mails with CCC and Chen re same.	0.20
07-18-24		
CCC	Call with UST re insurance issues (.20); prepare e-mail to Chi re insurance (.10).	0.30
07-19-24		
CCC	Call with UST re insurance and e-mail client (.20); review Veritas agreement re service and respond to e-mail re meeting (.30)..	0.50
07-24-24		
CCC	Review June MOR info and backup.	0.20
AAI	Review draft documents and further revisions to May operating report (.80); work on June operating report (1.40).	2.20

CHOI & ITOPage: 2
08-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 25010

07-25-24		
AAI	Review and comment on the reconciliation reports (.10); e-mail Flores regarding the operating reports (.10).	0.20
07-29-24		
AAI	Read and respond to e-mail from client regarding payables; read e-mail from client regarding bank statements.	0.10
08-01-24		
CCC	E-mails with court re hearing and counsel re hearing.	0.10
08-06-24		
CCC	Review forms and e-mail from UST analyst re IPP and e-mail to client and accountant; review AAI questions re Schedules/SOFA.	0.20
AAI	Read e-mail from Chen regarding waiver of local counsel requirement and research re same.	0.20
08-07-24		
CCC	Multiple e-mails with chambers re hearing dates for additional motions.	0.10
08-13-24		
CCC	Review and respond to bookkeeper re reporting for IPP.	0.10
08-14-24		
CCC	Review minutes and circulate (.10); e-mails with counsel for CNMI re briefing schedule (.10); prepare order on motion to convert (1.00).	1.20
08-15-24		
CCC	Review comments to IPP report.	0.10
AAI	Review and comment on periodic report.	0.60
08-20-24		
CCC	Review e-mails re IPP report.	0.10
08-21-24		
AAI	Review documents from client.	0.20
08-23-24		
CCC	Review e-mails re IPI BS.	0.10

CHOI & ITOPage: 3
08 -31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 25010

08-26-24	AAI	Follow up with bookkeeper regarding IPP balance sheet (.10); revise 2015.3 filing (.20); revise operating report (.20).	0.50	
08-30-24	AAI	Finalize periodic report for electronic submission (.20); e-mails with client regarding operating reports (.20).	0.40	
	CCC	Review May and June operating reports.	0.30	
		SUB TOTAL	9.60	\$3,390.00
FEE SUMMARY:				
	ATTORNEY	HOURS	RATE	TOTAL
	Chuck C. Choi	3.40	\$450.00	\$1,530.00
	Allison A. Ito	6.20	\$300.00	\$1,860.00
		STATE TAX		<u>159.74</u>
		TOTAL FEES		\$3,549.74
		TOTAL EXPENSES		<u>\$0.00</u>
		TOTAL CURRENT WORK		\$3,549.74

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-01

INVOICE NO: 25029

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS	
09-05-24			
AAI	Research information regarding case administrator for Nguyen (.20); read and respond to e-mail from Verita regarding creditor mailing information (.30).	0.50	
09-09-24			
AAI	Work on operating report (1.20).	1.20	
09-12-24			
AAI	Read e-mails from Verita regarding ECF access and ability to populate website with filings (.10); draft statement of position regarding vehicle sales (.40).	0.50	
09-13-24			
AAI	Prepare July operating report (.70); prepare amended June operating report (.30).	1.00	
09-23-24			
AAI	Read Halegua e-mail regarding recent filings by the Committee, case status and request for update, review filed pleadings and confer with CCC regarding recent filings by Committee (.20); read order shortening time on application to employ Intrepid (.10).	0.30	
09-26-24			
AAI	Follow up with client regarding operating report.	0.20	
09-27-24			
CCC	Review MOR.	0.10	
AAI	Finalize amended June operating report for electronic submission (.20); finalize July operating report for electronic submission (.30).	0.50	
	SUB TOTAL	4.30	\$1,305.00

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09 -30-24

Imperial Pacific International (CNMI) LLC
Administrative

ACCOUNT NO: 1815-01
INVOICE NO: 25029

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	0.10	\$450.00	\$45.00
Allison A. Ito	4.20	\$300.00	\$1,260.00
STATE TAX			<u>61.49</u>
TOTAL FEES			\$1,366.49
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$1,366.49

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-01

INVOICE NO: 25056

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS
10-01-24		
AAI	Read e-mails from Committee Counsel regarding claims noticing matters (.20); follow up with client regarding additional addresses for creditors (.10); submit further redlined document (.20).	0.50
10-02-24		
AAI	Prepare summary of materials for due diligence folder (.50); video conference with CCC, Committee counsel and Intrepid (.70); review site photos and videos for quality and relevance for diligence folder (.30); prepare due diligence folder for Intrepid (.60).	2.10
10-05-24		
AAI	Read e-mail from CCC to client regarding noticing agent and continued cooperation (.10); review draft reports from client for preparation of operating report (.10).	0.20
10-10-24		
CCC	Review MOR.	0.20
10-19-24		
CCC	Review recusal and assignment notices (.10); prepare e-mail to client and prepare response to Halegua re Judge Faris (.20).	0.30
AAI	Read recusal by Judge Manglona and order assigning Judge Faris to case, and e-mail from CCC to client re same (.20); read order denying bid procedures motion, granting Intrepid Application and denying Keen-Summit Application (.10).	0.30
10-21-24		
AAI	Read e-mail from client regarding case status (.10); read e-mail from CCC summarizing call with Steinberg and client comments re same (.10).	0.20

CHOI & ITOPage: 2
10-31-24Imperial Pacific International (CNMI) LLC
AdministrativeACCOUNT NO: 1815-01
INVOICE NO: 25056

10-28-24

AAI Follow up with client regarding operating report status (.10); work on mor (.70). 0.80

10-29-24

AAI Further revisions to operating report. 0.20

10-30-24

AAI Further revisions to August operating report and e-mail client re same (.30); review client comments and incorporate same (.20); prepare September operating report (.80); review minute order setting December status conference (.20); call to clerk regarding November and February status conferences (.10). 1.60

10-31-24

AAI Further revise September operating report (.60); e-mails with client re same (.10). 0.70

SUB TOTAL

7.10 \$2,205.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	0.50	\$450.00	\$225.00
Allison A. Ito	6.60	\$300.00	\$1,980.00

STATE TAX 103.90

TOTAL FEES \$2,308.90

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$2,308.90

**FIRST DAY MOTIONS &
DIP FINANCING
(Client Matter# 1815-02)**

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-02

INVOICE NO: 24941

RESPONSIBLE ATTY: CCC

RE:	First Day Motions and DIP Financing	HOURS
04-19-24		
CCC	Work on motion re interim fees.	0.70
AAI	Work on wage motion and updated exhibits to wage motion (.80); analyze IPI employee accrued PTO spreadsheet and compare as to Schedule E (.60); analyze Nov 2021 AP aging and compare as against HHR matrix (.30); follow up with client for additional information regarding AP aging (.20); research local rules and prepare AAI PHV application (.60); prepare EP motion to extend deadline for case opening documents (.30); further revise joint employment application of bankruptcy co-counsel (.30); further revise motion regarding notice procedures (.20); revise first day motion regarding interim fee procedures (.20); read local bankruptcy rules regarding shortening time and prepare motion to shorten time on first day motions (.30); research local rules on noticing motions and revise notice of hearing on first day motions (.30); work on schedules for SOFA (.20); read e-mails from UST's office regarding 341 meeting and initial debtor interview (.10).	4.40
04-20-24		
CCC	Revisions to two employment applications and e-mails with counsel re same (.40); revise wage motion (.40); revise fee procedures motion and prepare e-mail to counsel (.40); review pleadings and news articles for background and begin work on first day declaration (1.50).	2.70
AAI	Revise joint employment application and e-mail to McDonald (.30); prepare application to employ Michael Chen Law Offices and e-mail Chen re same (.40); prepare CCC pro hac application and e-mail CCC & AAI pro hac applications to McDonald for further action (.40); ; prepare DIP financing motion (.40).	1.50

CHOI & ITOPage: 2
05-31-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24941

04-21-24

CCC Work on first day motions and first day declaration (2.80); call with Chen re retainer and disclosure (.20); prepare e-mail to Chen and McDonald re billing and matters (.20). 3.20

AAI Draft DIP financing motion. 1.40

04-22-24

CCC Revise first day motions and ex parte motion (2.20); call with client and legal team re first day motions (1.20); e-mail to UST office re IDI; call with UST re status (.30); review follow up e-mails re filing and corrections (.20). 3.90

AAI Work on Schedule E and F (1.20); analyze asset listing and work on schedules A/B (1.30); work on statement of financial affairs (.70); e-mail client for additional information for statement of financial affairs and schedules (.20); further revise emergency ex parte motion to shorten time on various first day motions (.30); further revise notice of hearing on various first day motions (.70); video conference with CCC, McDonald, Chen and client regarding first day motions (1.20); finalize wage motion (.70); finalize interim fee procedures motion (.40); further revise DIP motion (.80). 7.50

04-23-24

CCC Review e-mails and revise NOH hearing. 0.20

AAI Review chapter 11 docket (.10); prepare order on motion to shorten time (.70); prepare notice of hearing on first day motions (.90). 1.70

04-24-24

CCC Review e-mails re order granting motion and notice of hearing and UST statement. 0.20

AAI Read order granting motion to shorten time and notice (.10); read UST's statement regarding various first day motions (.20). 0.30

04-25-24

CCC Review opposition and statement re first day motions and prepare for hearing (1.40); call from McDonald re first day hearing (.20); call with client and team re same (.30); participate in first day hearing (1.00); follow up call with UST re same (.20); call with client and team re hearing issues (1.50). 4.60

CHOI & ITOPage: 3
05-31-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24941

AAI	Prepare for hearing on first day motions (.20); video conference with CCC and client to review statements filed in response to first day motions and in preparation for first day hearing (.30); attend hearing on first day motions (1.00); further video conference with client discussing outcome of hearing and next steps (1.50); follow up regarding continued hearing on DIP financing motion (.20); read opposition to first day motions filed by Gray (.20).	3.40
04-26-24		
AAI	Revise orders on pro hac vice applications for CCC and AAI (.30); prepare interim order on application to employ C&I and MLO as general bankruptcy counsel (.60); prepare interim order on application to employ M. Chen as special litigation counsel (.60); prepare order on wages (.40); research docket regarding constitutional issues (.20).	2.10
05-01-24		
CCC	Review and edit first day orders and e-mails with UST re same.	0.20
AAI	E-mail with UST regarding proposed order on first day wage motion.	0.10
05-06-24		
AAI	Further work on loan agreement and amended DIP Term sheet.	1.70
05-07-24		
CCC	Review information re lender and banking (.10); review revised term sheet and circulate redline and clean (.30)	0.40
AAI	Read additional documentation from client regarding background concerning DIP Lender (.20); read e-mails from Song regarding relief from stay (.10); read description of collateral attached to UCC filed by Century Estates in 2022 (.10).	0.40
05-08-24		
CCC	Work on DIP credit agreement and confer with AAI (.80); review and edit submission re DIP (.20).	1.00
AAI	Revise loan agreement (.80); research lender's background and further revise submission of loan documents (.70).	1.50
05-09-24		
CCC	E-mails re financing.	0.10

CHOI & ITOPage: 4
05 -31-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24941

AAI	Read and respond to questions from client regarding draft loan agreement and send revised loan agreement (.70); finalize submission of DIP loan documents and exhibits for filing and e-mail McDonald re same (.80).	1.50
05-13-24		
CCC	Review UST statement.	0.20
AAI	Read UST's position statement regarding amended DIP loan terms and summarize same for client.	0.30
05-14-24		
AAI	Read filed interim order regarding application to employ bankruptcy counsel and order on wage motion.	0.10
05-22-24		
AAI	Read ECF No 75 and prepare notice of hearing on first day motions.	0.30
05-24-24		
AAI	Read and respond to e-mail from Halegua regarding citation (.10); work on opposition to Genc stay motion (1.60); research caselaw on denial stay motion where default judgment motion has been fully briefed by the parties (.70); review docket 20-cv-31 and second motion for default judgment pleadings and considerations on the relief from stay motion (.30).	2.70
05-27-24		
CCC	Review oppositions to DIP financing.	0.30
05-29-24		
CCC	Review filings and prepare for DIP financing hearing and relief from stay hearing (1.40); participate in hearing on DIP and other matters and follow up call with client (2.80).	4.20
AAI	Read late filings by Dotts Law joining in Gray's opposition to DIP financing motion and Gray's relief from stay motion (.20); prepare summaries of the pleadings regarding DIP Financing, Interim Fee Procedures and Gray's relief from stay motion (.90); attend hearing on First Day motions (1.80); call with CCC, McDonald, Chen & Client regarding hearing and next steps (1.00); prepare amended notice of final hearing on first day motions (.30).	4.20
05-30-24		
CCC	Review article re DIP funding (.10); edit notice of final hearing on DIP and other matters (.10).	0.20

CHOI & ITOPage: 5
05-31-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24941

AAI	Prepare order granting DIP financing on an interim basis (1.80);	2.60	
	prepare interim order granting interim fee procedures motion (.40);		
05-31-24	prepare amended notice of final hearing on first day motions (.40).		
CCC	Revise Motion and DIP order and circulate to UST and Committee.	1.30	
SUB TOTAL		61.10	\$21,840.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	23.40	\$450.00	\$10,530.00
Allison A. Ito	37.70	\$300.00	\$11,310.00
STATE TAX			<u>1,029.10</u>
TOTAL FEES			\$22,869.10
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$22,869.10

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Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-02

INVOICE NO: 24986

RESPONSIBLE ATTY: CCC

RE:	First Day Motions and DIP Financing	HOURS
06-05-24		
AAI	Prepare interim order for submission to chambers and e-mail chambers re same (.20); review notes from interim hearing on DIP financing motion and prepare supplemental declaration in support of DIP financing (.70).	0.90
06-07-24		
AAI	Read e-mails from client regarding DIP loan.	0.10
06-08-24		
AAI	Research DIP Lender's background and draft declaration in support of debtor-in-possession financing.	0.70
06-09-24		
CCC	Work on Sit declaration (1.80); call with team re DIP and license issues and revise declaration(1.00).	2.80
AAI	Video conference with CCC, McDonald and client regarding DIP financing motion and plan.	1.00
06-10-24		
CCC	Review e-mail from chambers and review minutes and prepare response re form of DIP order.	0.40
AAI	Read e-mail from court clerk regarding proposed order on DIP financing and confer with CCC re same and interim fee procedures order (.10); read e-mails regarding Sit declaration (.20).	0.30
06-11-24		
CCC	Review DIP order and e-mail to client re funding.	0.20
06-14-24		
CCC	Review UST statement re DIP.	0.10

CHOI & ITOPage: 2
06 -30-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24986

06-16-24	CCC	Review oppositions to DIP.	0.30
06-17-24	AAI	Read e-mail from client regarding status of funding (.10); review various opposition to the DIP financing motion (.20); research caselaw regarding whether a court-appointed receiver constitutes an "assignee" for the benefit of creditors (.80); read e-mails from Wong and Verbrugge regarding proposed interim order on interim fee procedures (.10); finalize interim order on interim fee procedures for electronic submission to the court (.30); draft opposition to Clear Management's motion to be excused from compliance of 543 (1.70).	3.20
06-18-24	CCC	Prepare memo re DIP oppositions and litigation issues (.50); call with client re same (.80).	1.30
06-19-24	CCC	Call with Committee counsel re potential modifications to DIP loan (.30); call with client re same (1.00).	1.30
	AAI	Video conference with regarding case status and DIP financing.	1.00
06-20-24	CCC	Call with Committee counsel re DIP issues (.20); prepare for DIP hearing (1.40); call with UST re status of DIP and case going forward (.20); participate in DIP hearing and other matters and review minutes (1.60); call with client re DIP hearing (1.00).	4.40
	AAI	Attend final hearing on various first day motions (1.40); work on final order on employment of general bankruptcy counsel (.40); work on final order on employment of special litigation counsel (.40); video conference with CCC, McDonald, Chen and client regarding hearing outcome and next steps (1.00).	3.20
06-22-24	AAI	Conference with CCC regarding DIP financing order and revised budget(.20); revise DIP financing budget and updated UST quarterly fee estimates (.30); review exhibits 5 and 6 submitted in the License Revocation proceedings (.20); prepare supplemental declaration of CHI in support of DIP Financing (.80); work on second interim DIP financing order (.90).	2.40
06-24-24	CCC	Revise DIP budget (.50); review filing by Gray (.40); revise Chi	4.60

CHOI & ITOPage: 3
06 -30-24Imperial Pacific International (CNMI) LLC
First Day Motions and DIP FinancingACCOUNT NO: 1815-02
INVOICE NO: 24986

declaration re Budget and purported loan (2.80); call with client and legal team re same and strategy (.90).

06-25-24	AAI	Further revisions to Chi declaration in support of DIP financing (.20); review revised DIP Financing budget (.10).	0.30	
	CCC	E-mail with Committee counsel re budget and e-mail Mr Sit counsel re declaration (.10); further work and finalize on Chi declaration (1.30); e-mail from Chi re comments and call with Chi re same (.20); revise and circulate second IP order (.60); review comments from UST and Committee (.10).	2.30	
06-26-24	AAI	Conference call with CCC and Ching regarding DIP financing, status of Arent Fox Employment application, and insurance matters (.20); conference call with CCC, Ordubegian and C. Wong regarding DIP financing, revised DIP budget, insurance and 363 vs. plan (.50).	0.70	
	CCC	E-mails and call with Sit counsel and Chris Wong re Sit intermediary (.30) review files and prepare for DIP hearing and RFS hearing (1.80); participate in RFS and DIP hearing (1.30).	3.40	
	AAI	Read redline comments from Verbrugge and Wong regarding 2nd interim order re DIP Financing and e-mail further revisions to CCC (.20); read e-mail from Verbrugge re final orders to employ bankruptcy counsel and special litigation counsel, and finalize same for electronic submission (.40); read comments from Wong regarding Sit declaration and nexus between lender and Ji (.10); read e-mails from CCC and McDonald re same and identity of lender (.10); prepare for and attend hearing on DIP Financing Motion and motion for relief from stay to pursue appeal (1.20); e-mail Verbrugge and Wong with further revisions to 2nd interim order re DIP Financing (.10); finalize same for electronic submission to chambers (.30).	2.40	
SUB TOTAL			37.30	\$14,355.00
FEE SUMMARY:				
ATTORNEY		HOURS	RATE	TOTAL
Chuck C. Choi		21.10	\$450.00	\$9,495.00
Allison A. Ito		16.20	\$300.00	\$4,860.00

CHOI & ITO

Imperial Pacific International (CNMI) LLC
First Day Motions and DIP Financing

Page: 4
06-30-24

ACCOUNT NO: 1815-02
INVOICE NO: 24986

STATE TAX	<u>676.41</u>
TOTAL FEES	\$15,031.41
TOTAL EXPENSES	<u>\$0.00</u>
TOTAL CURRENT WORK	\$15,031.41

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-02

INVOICE NO: 25004

RESPONSIBLE ATTY: CCC

RE:	First Day Motions and DIP Financing	HOURS	
07-16-24			
CCC	Review files and prepare final DIP order.	1.90	
07-17-24			
CCC	Review comments to DIP and forward signed order to client.	0.10	
AAI	Read e-mails from Wong and Verbrugge regarding final order on DIP financing (.10); finalize final order on DIP financing for electronic submission (.40).	0.50	
08-27-24			
CCC	Review bank account information and e-mail from Chi re DIP loan status.	0.10	
SUB TOTAL		2.60	\$1,095.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	2.10	\$450.00	\$945.00
Allison A. Ito	0.50	\$300.00	\$150.00
STATE TAX			<u>51.60</u>
TOTAL FEES			\$1,146.60

CHOI & ITO

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08 -31-24

Imperial Pacific International (CNMI) LLC
First Day Motions and DIP Financing

ACCOUNT NO: 1815-02
INVOICE NO: 25004

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$1,146.60

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-02

INVOICE NO: 25030

RESPONSIBLE ATTY: CCC

RE: First Day Motions and DIP Financing

HOURS

SUB TOTAL

0.00 \$0.00

FEE SUMMARY:

ATTORNEY HOURS

RATE

TOTAL

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$0.00

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-02

INVOICE NO: 25057

RESPONSIBLE ATTY: CCC

RE:	First Day Motions and DIP Financing	HOURS	
10-29-24			
CCC	E-mails with Chi re DIP funding and budget issues.	0.10	
10-30-24			
CCC	Review e-mail re funding and confer with AAI re source of funding; call with Chi re DIP funding issues.	0.20	
	SUB TOTAL	0.30	\$135.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	0.30	\$450.00	\$135.00
	STATE TAX		<u>6.36</u>
	TOTAL FEES		\$141.36
	TOTAL EXPENSES		<u>\$0.00</u>
	TOTAL CURRENT WORK		\$141.36

**EMPLOYMENT/FEE
(Client Matter# 1815-03)**

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-03

INVOICE NO: 24951

RESPONSIBLE ATTY: CCC

RE:	Employment/Fee	HOURS	
04-22-24			
AAI	Read comments from Chen and revise Chen employment application (.70); finalize application to employ Choi & Ito and McDonald Law Office for electronic submission (.60).	1.30	
04-23-24			
CCC	Call with UST re status of case and committee issues.	0.30	
04-30-24			
CCC	E-mails with counsel and client re employment of collection counsel.	0.10	
05-02-24			
CCC	Call with DOL counsel re receivership and RFS.	0.30	
05-03-24			
CCC	E-mails with UST re employment order and amendment.	0.10	
AAI	Review UST's comments on interim order approving employment of Chen Law Office and e-mail to Michael.	0.10	
05-04-24			
CCC	Review Chen comment to employment order and prepare e-mail to UST.	0.10	
05-23-24			
CCC	Call with Cario Hon re license.	0.70	
	SUB TOTAL	3.00	\$1,140.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
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CHOI & ITO

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05 -31-24

Imperial Pacific International (CNMI) LLC
Employment/Fee

ACCOUNT NO: 1815-03
INVOICE NO: 24951

Chuck C. Choi	1.60	\$450.00	\$720.00
Allison A. Ito	1.40	\$300.00	\$420.00
STATE TAX			<u>53.72</u>
TOTAL FEES			\$1,193.72
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$1,193.72

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-03

INVOICE NO: 24987

RESPONSIBLE ATTY: CCC

RE:	Employment/Fee	HOURS
06-14-24		
CCC	Review interim fee procedures order and circulate to UST and Committee.	0.20
06-17-24		
CCC	E-mail from court re fee order and review committee and UST comments (.10); review e-mails with potential appraiser (.10).	0.20
06-21-24		
CCC	Review employment applications.	0.30
AAI	Work on final interim fee procedures order.	0.60
06-24-24		
CCC	Prepare e-mail to client re Committee applications and recent filings.	0.20
06-25-24		
CCC	Review and edit final employment orders.	0.20
06-26-24		
CCC	E-mail chambers and final review of final fee procedures order.	0.20
06-27-24		
CCC	Review appraisal proposal and e-mail with Chi re same (.10); research potential broker and e-mail re introductory call (.40); review and circulate fee procedures order to counsel (.10).	0.60
AAI	Read e-mails from Verbrugge and Wong and finalize final order regarding interim fee procedures for submission to chambers.	0.20

CHOI & ITOPage: 2
06 -30-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 24987

SUB TOTAL	2.70	\$1,095.00
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FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	1.90	\$450.00	\$855.00
Allison A. Ito	0.80	\$300.00	\$240.00

STATE TAX	<u>51.60</u>
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TOTAL FEES	\$1,146.60
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TOTAL EXPENSES	<u>\$0.00</u>
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TOTAL CURRENT WORK	\$1,146.60
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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-03

INVOICE NO: 25005

RESPONSIBLE ATTY: CCC

RE:	Employment/Fee	HOURS
07-01-24		
CCC	Prepare memo to client re employment terms (.80); call with client re Keen and sale issues (1.00).	1.80
07-08-24		
CCC	Prepare interim fee statement summary.	0.40
07-10-24		
AAI	Read e-mail from Wang regarding KCC employment application (.10); revise 80-20 letter and attachments (.40).	0.50
07-11-24		
AAI	Work on 80/20 letter, attachments and spreadsheet (.70); e-mail Committee and UST counsel re same; e-mail client re same (.10).	0.80
07-12-24		
CCC	Review e-mail from counsel for Committee re edits to KCC and e-mail to counsel.	0.10
07-21-24		
CCC	Review KCC contract and application.	0.40
07-22-24		
CCC	Review Hong Kong law firm communication (.20); review UST comments re KCC (.20).	0.40
07-23-24		
CCC	Call with KCC re scope of services (.50); review UST redline and prepare language re KCC retention (.20) and review response (.20).	0.90
AAI	Read UST's redline to Verita retention agreement in preparation for conference call with Committee & Verita (.20); video conference with CCC, Wong, Wang, and Verita regarding anticipated role of Verita in bankruptcy proceeding, fee structure, and further edits to	0.80

CHOI & ITOPage: 2
08-31-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25005

	retention agreement (.50); read further comments from Verbrugge re same (.10).	
07-25-24		
CCC	Review summary of HK lawsuit and prepare response.	0.20
07-27-24		
CCC	Review KCC employment application and e-mail from AAI to counsel.	0.20
AAI	Review revised Verita employment agreement and proposed order regarding employment (.20); review and revise draft joint application to employ Verita and e-mail comments to Wang re same (.40); e-mail client regarding role of Verita and importance of retaining a noticing agent, summary of Verita retention agreement and application to employ same (.20).	0.80
07-29-24		
CCC	E-mails with client re payment of monthly fees; review e-mails re joint employment of KCC.	0.10
AAI	Read e-mail from Wang regarding application to employ Verita as noticing agent.	0.10
08-01-24		
CCC	Work on June fee statement.	0.30
08-02-24		
CCC	Call with HK lawyers re receivable and lawsuit.	0.90
08-09-24		
CCC	Review draft application to employ Verita and agreement.	0.20
08-10-24		
CCC	E-mails with client re Vertia.	0.10
08-11-24		
AAI	Read redlined employment application for KCC as claims agent and various e-mails from Wang and CCC re same.	0.10
08-14-24		
CCC	Review fee notice and circulate.	0.20

CHOI & ITOPage: 3
08-31-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25005

AAI	Read ArentFox interim fee request and review invoices.	0.10	
08-18-24			
AAI	Work on 80/20 letter.	0.40	
08-19-24			
CCC	Review C&I July fee statement and circulate.	0.10	
AAI	Finalize 80/20 letter for circulation (.30); read e-mails from UST and CCC regarding status of application to employ Verita (.10).	0.40	
08-24-24			
AAI	Review and comment on invoices from Chen (.20); prepare summary chart for 80/20 letter regarding M. Chen fees (.10).	0.30	
08-26-24			
CCC	Review proposed NDA re counsel for HK lawsuit.	0.10	
08-28-24			
CCC	E-mail with Keen-Summit re engagement.	0.10	
08-29-24			
CCC	Call with Keen-Summit re retention by debtor (.50); e-mails with client re due diligence and scheduling (.10); review and revise engagement letter (1.00); e-mail to client re marketing and engagement (.20).	1.80	
08-30-24			
AAI	Work on application to employ Keen Summit.	0.40	
08-31-24			
CCC	Work on application to employ Keen Summit.	1.40	
SUB TOTAL		14.40	\$5,775.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	9.70	\$450.00	\$4,365.00
Allison A. Ito	4.70	\$300.00	\$1,410.00
STATE TAX			<u>272.12</u>
TOTAL FEES			\$6,047.12

CHOI & ITO

Page: 4
08-31-24

Imperial Pacific International (CNMI) LLC
Employment/Fee

ACCOUNT NO: 1815-03
INVOICE NO: 25005

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$6,047.12

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-03

INVOICE NO: 25031

RESPONSIBLE ATTY: CCC

RE:	Employment/Fee	HOURS
09-01-24		
CCC	Further work on application to employ Keen.	1.50
09-02-24		
CCC	Review and circulate fee request.	0.10
09-03-24		
CCC	E-mail with committee counsel and client re payment (.10); final edits to employment app and circulate (.10).	0.20
AAI	Revise application to employ Keen Summitt as real estate broker (.20); draft proposed order approving employment of Keen Summitt (.60).	0.80
09-04-24		
CCC	Review comments from Howard and Matt and e-mail with Keen re employment; follow up e-mail to UST requesting comments (.30); review attorney invoices and e-mail to Committee counsel re payment of admin from carveout (.10); review UST comments and circulate (.10); Confer w/ AAI re Keen (.10).	0.60
AAI	Read and respond to e-mail from Chen regarding 80/20 letter (.20); review file and calculate disbursements of interim fees and amount of pending requests (.10); conference with CCC regarding Keen Summit employment application (.10); read and respond to e-mail from H. Bordwin regarding declaration in support of employment application and conflicts check (.20); read and respond to e-mail from Bordwin regarding conflicts check and secured credits (.10).	0.70
09-05-24		
CCC	Review Keen responses to UST objections to retention and forward to UST (.20); further e-mail with UST re motion and shortening	0.60

CHOI & ITOPage: 2
09-30-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25031

time (.10); make changes to Keen agreement per concessions and call with Harold Bordwin (.30).

AAI	Read Bordwin responses to inquiry from UST (.10); finalize application to employ Keen-Summit (.40); read e-mails between CCC and Verbrugge regarding hearing on application to employ Keen-Summit and shortening time re same (.20).	0.70
09-09-24		
CCC	E-mail with Keen re status of Keen application and revise form of order shortening time(.10); e-mail with Keen re investment banker retention and communication with Committee(.10); review and circulate UST opposition to Keen (.20); review Chen statement and respond (.10).	0.50
AAI	Revise proposed order regarding ex parte motion to shorten time on Keen-Summit employment application (.20); read UST opposition to Keen-Summit employment application (.20).	0.40
09-10-24		
CCC	Review UST objection and circulate (.10); review invoices from ArentFox and circulate (.20).	0.30
AAI	Read Chen letter regarding fees and UST's objections and response to same (.10); read e-mail from Bordwin in response to UST's objection to Debtor's application to employ Keen Summit (.10).	0.20
09-13-24		
CCC	Respond to e-mail from Keen re update on hearings and e-mails re UST reply (.30); e-mails with Keen and Chi re access to link and further call (.10); e-mail to client re Keen update (.10).	0.50
AAI	Draft reply in support of Keen Summit employment application (1.70); draft supplemental declaration of H. Bordwin in support of employment application (.40).	2.10
09-15-24		
CCC	Review e-mail from Committee counsel re retention issues and forward to Keen (.10); prepare e-mail to client re same (.10).	0.20
09-16-24		
AAI	Prepare e-mail to Keen-Summit re deadlines (.10).	0.10
09-18-24		
CCC	Review spreadsheet of fees and call with AAI (.10); review and	0.60

CHOI & ITOPage: 3
09-30-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25031

analyze Committee opposition to Keen employment (.20); review Intrepid application and term sheet (.30).

AAI	Review Arent Fox monthly invoices (.20); prepare summary of interim invoices for counsel for debtor and committee (.20); read Committee opposition to employment of Keen Summitt (.20).	0.60
09-19-24		
CCC	Review UST comments to Intrepid and circulate (.10); call with Committee and Keen Summit re professional retention issues (.50).	0.60
AAI	Review UST's comments and redlines to the application to employ Intrepid (investment banker) and engagement letter (.20); video conference with CCC, Committee counsel & Keen-Summit regarding retention issues (.50).	0.70
09-20-24		
CCC	Review e-mail exchange between Committee and UST and revised Intrepid application (.40); review and comment on response from Keen re marketing questions and circulate to client (.20); revise Committee's motion to shorten time to hear Intrepid motion and prepare e-mail to Committee counsel (.30).	0.90
AAI	Read Intrepid redlined employment application and engagement letter (.20); read M. Bordwin's draft response to the committee regarding Keen-Summitt's background and experience (.10).	0.30
09-22-24		
CCC	E-mail to Committee re Bordwin response on marketing (.10); review Committee motion to shorten time for Intrepid (.10).	0.20
09-23-24		
CCC	Review and forward KCC invoice (.10); review KCC POC form (.10); review e-mail from client re addresses and confer AAI re same and review AAI e-mail to client (.10); review Committee notice and filing by Dott (.10).	0.40
AAI	Revise 80/20 letter (.20); draft opposition to intrepid employment application (.30).	0.50
09-24-24		
CCC	Review supplemental oppositions to Keen (.20); review UST opposition to Intrepid and circulate (.10); review e-mails re C&I invoice (.10).	0.40

CHOI & ITOPage: 4
09-30-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25031

CCC	Begin work on response to Keen objection (.60).	0.60	
AAI	Work on opposition to Intrepid employment application (2.80); research sections 327, 328 and 330 issues in connection with the Intrepid Employment Application (.80); finalize 80/20 letter for submission (.20); work on omnibus reply in support of Keen-Summit Employment (.30).	4.10	
09-25-24			
CCC	Review Chi e-mail re Nutting lawsuit and attachments (.30); e-mails with Chen and Chi re fees (.10); e-mails with Gray re fees and admin claims (.20); revise and finalize opposition to Intrepid and reply to Keen-Summit application (2.40).	3.00	
AAI	Read inquiry regarding professionals fees incurred through end of August and calculate same (.20); prepare omnibus reply in support of Keen Summit employment application (2.80); revise objection to Intrepid employment application (2.20); read Gray's objection to Intrepid employment application (.10).	5.30	
09-26-24			
CCC	E-mails with Bordwin re scope of concession re disinterestedness and participation at hearing.	0.10	
09-28-24			
CCC	Review Committee reply re Intrepid.	0.20	
09-30-24			
CCC	Prepare for hearing on employment applications (.70); call with Matt Bordwin re concessions (.30).	1.00	
AAI	Video conference with CCC and M. Bordwin in preparation for hearing on Keen Summit employment application (.30); read e-mails from Bordwin regarding compensation and economics, and contrasting Keen-Summit economics against Intrepid (.10); debrief call with CCC and Bordwin (.30).	0.70	
SUB TOTAL		29.70	\$10,785.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	12.50	\$450.00	\$5,625.00

CHOI & ITO

Page: 5
09 -30-24

Imperial Pacific International (CNMI) LLC
Employment/Fee

ACCOUNT NO: 1815-03
INVOICE NO: 25031

Allison A. Ito	17.20	\$300.00	\$5,160.00
STATE TAX			<u>508.19</u>
TOTAL FEES			\$11,293.19
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$11,293.19

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-03

INVOICE NO: 25063

RESPONSIBLE ATTY: CCC

	RE: Employment/Fee	HOURS
10-01-24		
CCC	Review bar date order and notice and e-mails from KCC.	0.30
10-02-24		
CCC	Review form of order on bar date and respond.	0.10
AAI	Review chart from client with updated addresses and quality control formatting to transmit data to Verita.	0.70
10-03-24		
CCC	Review proposed employment order for Intrepid and e-mail with Committee counsel.	0.20
10-04-24		
CCC	Review e-mails re addresses and contact information.	0.10
10-07-24		
CCC	Review e-mails between Committee counsel and KCC re bar date order and forms.	0.10
AAI	Read order on motion to shorten time on Keen employment application and prepare notice of hearing on Keen-Summitt Employment application.	0.60
10-08-24		
CCC	E-mails with Keen Summit re update and follow up (.10); work on September fee summary (.30).	0.40
10-09-24		
CCC	Review proposed form of bar date order and respond to committee e-mail.	0.20

CHOI & ITOPage: 2
10-31-24Imperial Pacific International (CNMI) LLC
Employment/FeeACCOUNT NO: 1815-03
INVOICE NO: 25063

10-17-24			
CCC	Review C&I September monthly report.	0.10	
AAI	Work on 80/20 letter and attachment.	0.40	
10-18-24			
CCC	Review KCC invoice and Arent Fox invoice and circulate.	0.30	
AAI	Review ArentFox September invoices (.20); review Verita September invoice (.10).	0.30	
10-23-24			
CCC	E-mails with Committee counsel re filing fee applications.	0.10	
AAI	Read e-mails from Wang and CCC coordinating first interim fee applications.	0.10	
10-25-24			
AAI	Work on 1st interim fee application.	0.60	
10-26-24			
AAI	Work on 1st interim fee application for C&I.	3.80	
10-27-24			
CCC	Call with McDonald re creditors and POC.	0.10	
10-28-24			
CCC	E-mails with Sophia Wang re status of carveout account and e-mail with AAI re same and local rules.	0.10	
AAI	Research LBR regarding requirements for interim fee applications (.20); further work on 1st interim fee application and revise LBR summary (1.30).	1.50	
10-30-24			
AAI	Further revise C&I 1st interim fee application.	0.40	
	SUB TOTAL	10.50	\$3,465.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
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CHOI & ITO

Page: 3
10 -31-24

Imperial Pacific International (CNMI) LLC
Employment/Fee

ACCOUNT NO: 1815-03
INVOICE NO: 25063

Chuck C. Choi	2.10	\$450.00	\$945.00	
Allison A. Ito	8.40	\$300.00	\$2,520.00	
STATE TAX				<u>163.27</u>
TOTAL FEES				\$3,628.27
TOTAL EXPENSES				<u>\$0.00</u>
TOTAL CURRENT WORK				\$3,628.27

CREDITORS & CLAIMS

(Client Matter# 1815-04)

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-04

INVOICE NO: 24960

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
04-24-24		
CCC	Review Gray filing re contempt and relief from stay and research re exceptions; research applicability of stay on appeal (1.80); call from receiver re default and collateral issues (.40).	2.20
AAI	Read letter from Gray's attorney regarding relief from the automatic stay to pursue award of attorneys fees (.10); call with CCC and Tang regarding US DOL receivership status, and potential stipulation for relief from stay as to former Plumeria hotel (.30).	0.40
04-26-24		
CCC	Review request for RFS and e-mails with Miller re call (.10); call with Miller and Chen re default and settlement issues (1.00); follow up call with Chen re creditor litigation issues (.70).	1.80
04-29-24		
CCC	E-mail with HHR counsel and schedule call.	0.10
AAI	Read proposed order regarding order show cause on lost liquor (.10); read e-mails from Chen and CCC regarding 9th circuit proceeding and relief from stay matters (.10); video conference with CCC, McDonald and Chen regarding litigation strategy in Gray proceedings (.50); prepare PHV for CCC in Gray proceeding (.40).	1.10
04-30-24		
AAI	Research caselaw regarding 362(b)(4) limitations in contempt proceedings and summary re same.	4.40
05-01-24		
CCC	Review e-mail and attachment re potential claims.	0.20

CHOI & ITOPage: 2
05-31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 24960

05-02-24	AAI	Read e-mail from Song regarding relief from stay stipulation with Department of Labor.	0.10
05-03-24	CCC	Calls from UST re Committee and e-mail with HHR re meeting.	0.10
05-05-24	CCC	Review Gray demand re adequate protection.	0.10
05-06-24	CCC	Review and comment on response to demand from Gray counsel and e-mails with Chen (.20); call with UST re committee and prepare e-mail to client; follow up e-mails with UST and client re solicitation (.40); research re writ of execution issues (.50).	1.10
05-07-24	CCC	Call with Chen prior to and after call with HHR (.40); call with HHR re committee and next steps (.50); prepare response to DOL and prepare e-mail to client (.10).	1.00
05-08-24	CCC	Review e-mails from Halegua re 541 issues (.10); call with DOL counsel re relief from stay (.20); review and respond to analysis of DOL payment (.10).	0.40
05-12-24	CCC	Review e-mails from Halegua.	0.20
05-13-24	CCC	Review committee appointment (.10); review e-mails from Halegua (.10); review filings by Halegua (.40).	0.60
05-14-24	CCC	Call with potential counsel for creditor (.10); call with client and team re RFS motion and strategy (1.10); e-mails with Miller re Committee position (.10).	1.30
05-15-24	CCC	Review HHR motion and declaration (.10) prepare comments re motion to continue (.50); call with Chen re litigation matters (.30); confer with MAO and AAI re RFS research issues (.40); review draft of opposition (.20); call with UST re status of Committee and case (.20).	1.70
05-16-24	CCC	Work on revising opposition to motion for relief (3.50); review docket from Gray and Fanter cases and certain pleadings (.20); call with client re relief from stay issues (1.10).	4.80

CHOI & ITOPage: 3
05-31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 24960

05-17-24	CCC	Review RFS motion by Miller.	0.30
05-20-24	CCC	Review Genc motion and memo (.30); e-mail to Jenny re service of RFS motion (.10); review cover sheet for RFS motion (.10).	0.50
05-22-24	CCC	Intro call with Committee counsel re background (.50); e-mail to group re call (.10); multiple e-mails with Guam counsel, McDonald and Committee counsel re local Committee counsel (.20).	0.80
05-23-24	CCC	Work on opposition to RFS motion.	1.70
05-24-24	CCC	Review filing by Committee re counsel and opposition to Gray.	0.20
05-27-24	CCC	Call with client and team to prepare for meeting of creditors.	2.30
05-28-24	CCC	Appear at meeting of creditors (3.00); follow up call with Committee counsel (.20).	3.20
	AAI	Attend 341 meeting (3.00); further revise position statement to Genc's relief from stay motion (.30).	3.30
05-29-24	CCC	Call with counsel before and after hearing.	0.50
05-30-24	CCC	E-mails with Committee counsel re DIP hearing (.10); review and revise response to Genc RFS motion (.20); e-mails with counsel re stipulating to RFS (.10).	0.40
05-31-24	CCC	Review e-mails from AAI to Chi re MOR questions (.10); e-mails with Genc counsel re stipulated RFS and copy to counsel (.10); review LBR and respond to Miller question (.10); locate and circulate RFS stipulation for Miller (.10); review proposed stipulation and respond (.10).	0.50
	AAI	Read e-mails from Miller regarding stipulated order for relief from stay and proposed form of order and read e-mails from committee counsel re same (.10); read court order on Gray's motion for relief	0.20

CHOI & ITOPage: 4
05 -31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 24960from stay and order compelling Clear Management to file 543
motion (.10).

SUB TOTAL			35.50	\$14,550.00
FEE SUMMARY:				
ATTORNEY	HOURS	RATE	TOTAL	
Chuck C. Choi	26.00	\$450.00	\$11,700.00	
Allison A. Ito	9.50	\$300.00	\$2,850.00	
STATE TAX			<u>685.60</u>	
TOTAL FEES			\$15,235.60	
TOTAL EXPENSES			<u>\$0.00</u>	
TOTAL CURRENT WORK			\$15,235.60	

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Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-04

INVOICE NO: 24988

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
06-01-24		
CCC	Review Halegua e-mail and reply to internal e-mails (.10); review minutes from RFS and DIP financing hearing (.10).	0.20
06-02-24		
CCC	Review calendar and respond to e-mails re briefing deadline for appeal RFS opposition and review initial draft of stipulation.	0.20
06-03-24		
CCC	Review revised stipulation re briefing schedule and e-mails with Committee counsel re same.	0.20
06-07-24		
CCC	Review proposed stipulation for RFS with DOL.	0.10
06-11-24		
CCC	E-mails with committee counsel re call; review e-mails re DOL claim and follow up e-mails with client re amount owed.	0.20
AAI	Read e-mails from Committee counsel regarding US DOL relief from stay stipulation and read e-mails from Chi and CCC regarding US DOL consent judgment and amount on deposit with US DOL.	0.10
06-12-24		
CCC	Call with committee counsel re status and sale/plan options (.30); meeting with Halegua and Berline re creditor issues (1.70).	2.00
06-14-24		
AAI	Research caselaw cited by Clear Management in its motion to excuse compliance with section 543.	0.80
06-18-24		
AAI	Work on opposition to motion to excuse compliance with Section 543 of the Bankruptcy Code (2.90); work on reply in support of motion for relief from stay to pursue 9th circuit appeal (3.70); video	7.40

CHOI & ITOPage: 2
06-30-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 24988

	conference with CCC, McDonald, Chen and client regarding upcoming motions (reply in support of relief from stay, opposition to Clear Management's motions) (.80).	
06-19-24		
AAI	Research caselaw cited by Clear Management in motion to excuse compliance (.40); research additional factors utilized in 543(d)(1) analysis (.60); further work on opposition to Clear Management's motions to excuse compliance with Section 543 and to approve auction sale (3.70).	4.70
06-20-24		
CCC	Review CNMI motion to convert and prepare e-mail to client re same (.80); call with client re same (1.00); review default notice from creditor (.10).	1.90
AAI	Continue to work on opposition to Clear's motion.	0.80
06-21-24		
AAI	Read notice of default of settlement agreement from Kan Pacific Saipan, and consider response to Kan Pacific regarding the automatic stay violations.	0.10
06-24-24		
AAI	Video conference with CCC, McDonald and client regarding recent filings by UST and Gray and insurance coverage.	0.90
06-25-24		
CCC	Call with UST re status of case (.30); call with Committee counsel re same (.50) .	0.80
AAI	Read comments to declaration from Chi (.10); finalize Chi Declaration for electronic submission (.30).	0.40
06-26-24		
AAI	Review revised balance sheet and comments re same (.20); work on opposition to motion to convert case (1.10).	1.30
06-27-24		
CCC	Review Clear reply and Committee stipulation.	0.30
AAI	Read Orienta case and distinguish case from the case at bar (.30); further work on argument in opposition to the motion to convert case (.40).	0.70

CHOI & ITOPage: 3
06 -30-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 24988

SUB TOTAL			23.10	\$7,815.00
FEE SUMMARY:				
ATTORNEY	HOURS	RATE	TOTAL	
Chuck C. Choi	5.90	\$450.00	\$2,655.00	
Allison A. Ito	17.20	\$300.00	\$5,160.00	
STATE TAX			368.24	
TOTAL FEES			\$8,183.24	
TOTAL EXPENSES			<u>\$0.00</u>	
TOTAL CURRENT WORK			\$8,183.24	

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-04

INVOICE NO: 25006

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
07-01-24		
CCC	Review and forward questions from Committee re DOL collateral and review response.	0.10
07-02-24		
CCC	Call from Halegua re RFS and review RFS stipulation (.40); begin work on opposition to CNMI motion (1.00).	1.40
CCC	Research caselaw on exemptions to insurance requirements under guidelines (.90); revise opposition to Motion to Convert.(1.40);	2.30
AAI	Prepare declaration of Chi in support of opposition to motion to convert case (.30).	0.30
07-03-24		
CCC	Call with Committee counsel re sale and RFS issues (.80); call with Halegua re shortening time on hearing (.10); review Committee opposition to motion to convert (.20); work on opposition (2.00).	3.10
AAI	Further work on the opposition to the motion to convert (2.80); video conference with CCC, Ordubegian, Wong and Wang regarding engaging realtor, sale process, opposition motion to convert and noticing agent (.50); read Committee opposition to conversion motion (.20); research caselaw stating that a plan of liquidation is a viable option in chapter 11 cases (.60).	4.10
07-04-24		
CCC	Revise opposition to motion to convert and UST dismissal; e-mails to AAI re same.	2.00
07-05-24		
CCC	Review filings by Gray (.40); prepare e-mail to client re dismissal motion and filings by Gray (.60); call with client and team re same (1.00).	2.00

CHOI & ITOPage: 2
08 -31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25006

AAI	Read Gray's renewed motion for relief from automatic stay (.20); read order granting motion to shorten time (.10); read Committee's draft application to employ noticing agent and retention letter (.30); video conference with CCC, McDonald and client regarding case status and Gray's motion for relief from stay (.90).	1.50
07-09-24		
CCC	Review memo decision re RFS motion.	0.10
AAI	Read order denying Gray's motion for relief from automatic stay (.10); conference with CCC regarding opposition to Gray's second motion for automatic stay (.10).	0.20
07-10-24		
CCC	Review revisions to RFS stipulation and comment (.10); review files and work on Opposition to Renewed RFS Motion (3.00).	3.10
AAI	Revise response to renewed motion for relief from stay.	0.30
07-11-24		
CCC	E-mails with Chen and AAI re RFS minutes and order.	0.10
07-12-24		
CCC	Call with Wong re RFS stipulation for DOL and status of case and review further edits to stipulation.	0.50
07-15-24		
CCC	Review filing by Halegua re Clear motion and replies to motion to convert or dismiss by CNMI and UST.	0.30
07-16-24		
CCC	Review creditor invoice and e-mails with client re same (.20) call with Committee counsel re status (.20).	0.40
07-17-24		
CCC	Review and sign off on stipulation for RFS with DOL (.10); review status report re contempt matter (.10); review files and prepare for hearing on Clear motion and RFS (1.20); call with Committee counsel re same (.10); participate in hearing (1.30); call with UST re property of estate and insurance issues (.30).	3.10
AAI	Video conference with CCC, Chen and client regarding outcome of 7/17 hearing, stalking horse offer, and insurance matters.	0.60

CHOI & ITOPage: 3
08-31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25006

07-19-24	CCC	Conference call with Committee re sale issues.	0.50
07-21-24	CCC	Review form of order, minutes from hearing and prepare redline of order and draft cover e-mail.	0.50
07-22-24	AAI	Read and analyze correspondence from Hong Kong attorneys regarding status of collection cases.	0.10
07-23-24	CCC	Review further e-mails re comments to Clear order and respond; review final version and approve.	0.20
	AAI	video conference with CCC, Ordubegian and Wong regarding Vertias employment, Broker's employment and bid procedures.	0.40
	AAI	Read further comments from Clear Management and Halegua regarding order on Clear Motions and Gray Renewed Motions (.10); read e-mail from White regarding order on Clear Management's motion to excuse compliance (.10); video conference with CCC, Ordubegian and Wong regarding Vertias employment, Broker's employment and bid procedures (.40).	0.60
07-25-24	AAI	Read summary of Chan case from client.	0.10
07-28-24	CCC	Review draft e-mail to Halegua re contempt matter.	0.10
07-29-24	CCC	E-mails with Glass re call and e-mail to counsel re background.	0.10
07-30-24	AAI	Read e-mail from Wong regarding moving claims bar date and considerations in timing of the motion.	0.10
07-31-24	CCC	Call with counsel for CNMI re status of case and potential sale.	0.90
08-01-24	CCC	Call with Committee re term sheet, CNMI claims and insurance issues.	0.60

CHOI & ITOPage: 4
08 -31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25006

AAI	Video conference with CCC, and Committee counsel regarding bid procedures motion, hiring notice agent and extension of bid procedures deadline.	0.60
08-02-24		
AAI	Read e-mail from client regarding HK creditors and compare against the schedules to determine whether creditors were listed on Schedule F and compile confirming list re same.	0.20
08-06-24		
CCC	Review e-mail from creditor counsel re invoices and respond; further e-mail re timing of objection.	0.20
08-07-24		
CCC	E-mails with Committee re service and pending matters.	0.10
AAI	Revise joint motion to extend claims bar date.	0.50
08-08-24		
CCC	E-mails with Committee counsel re hearing and motion to assume and broker/investment banker (.20); conference call with committee counsel re (.50); revise joint motion to extend bar date (.20).	0.90
AAI	Telephone call with creditor re case status.	0.20
08-09-24		
CCC	Review draft motion re bar date.	0.20
CCC	Call with Committee re update on bid procedures motion and pending matters (.30); call and e-mail with Wang re Verita application and agreement (.10); call from former employee re claim against Pac Rim and prepare e-mail to client re background (.10); call from former employee re same (.20).	0.70
AAI	Video conference with CCC and committee counsel regarding bid procedures motion, employment of noticing agent and bar date extension motion.	0.40
08-11-24		
CCC	Review supplemental UST filing (.20); review committee filing and prepare response and forward (.10); review terms of HK financing (.20); prepare response to client re committee filing (.20).	0.70

CHOI & ITOPage: 5
08-31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25006

08-12-24	CCC	E-mails with Committee counsel re hearing.	0.10
08-13-24	CCC	Review files and prepare for hearing (2.00); call with Committee counsel re hearing issues (.50); attend hearing on motion to convert and contempt matter (1.50); call with client re same and strategy (1.10).	5.10
	AAI	Research caselaw regarding "appropriate" insurance in chapter 11 and conference with CCC re same (.20); video conference with CCC and committee counsel in preparation for hearing on motion to convert (.50); listen to hearing on motion to convert and on motion to extend claims bar date (1.10); video conference with CCC, McDonald and client regarding hearing outcome and next steps on liquidating the assets (1.00).	2.80
08-19-24	AAI	Read e-mails from client and CCC regarding Clear rejecting prior bids for cars and re-listing the cars for sale.	0.10
08-23-24	CCC	Review IRS demand and e-mails with client re member issue.	0.20
	CCC	Review IRS letter.	0.20
08-26-24	CCC	E-mails with committee counsel re extension; review proposed stipulation (.20); review draft stipulated order and e-mail from Halegua and co-counsel and respond (.30); forward to committee counsel and client (.10); call with IRS revenue agent re payroll taxes (.30).	0.90
08-27-24	CCC	Review POCs (.20); e-mails with Halegua re form of extension and review same (.10); review e-mails re claims website (.10).	0.40
	AAI	Read demand letter for \$536,000 and attachments from Saipan Dream (.20); read demand letter for \$1.2 million and attachments from Yung Ho Human Resources Management Consultant Co., Ltd. (.20).	0.40
08-28-24	CCC	E-mail to client re claims website.	0.10

CHOI & ITOPage: 6
08 -31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25006

CCC Call with Committee counsel re status. 0.50

SUB TOTAL 45.20 \$18,315.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	31.70	\$450.00	\$14,265.00
Allison A. Ito	13.50	\$300.00	\$4,050.00

STATE TAX 863.00

TOTAL FEES \$19,178.00

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$19,178.00

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-04

INVOICE NO: 25032

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
09-04-24		
CCC	Review attorney demand and respond: follow up e-mail with client re creditor work.	0.10
AAI	Read e-mail from Klapman regarding Consilio (.10); research client files regarding Consilio and confer with CCC re same (.20).	0.30
09-07-24		
CCC	Respond to Dotts e-mail re property; draft forwarding e-mail to client re creditor objections.	0.10
09-09-24		
AAI	Read e-mail from Verita regarding CM/ECF and noticing issues (.10)	0.10
09-12-24		
CCC	Emails from KCC (.10).	0.10
AAI	Read e-mails from Halegua regarding deposition of Sit. and potential motion to compel deposition.	0.10
09-14-24		
AAI	Research files for addresses requested by Verita (.20); e-mail client for information re same (.10).	0.30
09-18-24		
CCC	Call with Halegua and Fritz re litigation and plan issues.	1.00
AAI	Read e-mails from Wang and Nguyen regarding service of notice of bar date and upcoming hearing to approve form of claim.	0.10

CHOI & ITOPage: 2
09-30-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25032

09-19-24

CCC	Review e-mail from Halegua re vehicle sale, OSC and review attachments (.30); calls with Halegua re OSC and continuance and review proposed stipulation and order and review order (.60).	0.90
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09-23-24

AAI	Read and respond to e-mail from client regarding modified proof of claim form and modifications to claim form for international creditors (.20);	0.20
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09-25-24

AAI	Read proof of claim filed by Rich Surplus Ventures.	0.10
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SUB TOTAL

		3.40		\$1,350.00
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FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	2.20	\$450.00	\$990.00
Allison A. Ito	1.20	\$300.00	\$360.00

STATE TAX	<u>63.61</u>
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TOTAL FEES	\$1,413.61
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TOTAL EXPENSES	<u>\$0.00</u>
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TOTAL CURRENT WORK**\$1,413.61**

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-04

INVOICE NO: 25064

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
10-02-24		
AAI	Conference with CCC on whether POC should be translated into Chinese for Chinese creditors.	0.10
10-04-24		
CCC	E-mails with creditor committee counsel re Halegua proposal re sale proceeds and writ of execution.	0.10
10-08-24		
CCC	Call with Halegua and Fritz re litigation and potential settlement.	0.50
10-09-24		
CCC	Review discovery in contempt filings (.50); e-mails re contempt matter(.20).	0.70
10-11-24		
CCC	Call with Halegua and Fritz re contempt motion and resolution.	0.60
10-13-24		
CCC	Review forward term sheet and e-mails with team and opposing counsel re term sheet (.30); review stipulation re continuance (.10).	0.40
10-14-24		
CCC	E-mails with Halegua and client re settlement and continuance and review stipulation and continued date.	0.20
10-15-24		
CCC	Review settlement redline and e-mail exchange between counsel relating to contempt matter.	0.30
AAI	Read e-mails from CCC and client regarding contempt proceeding and potential settlement terms (.10); read and respond to e-mail from Verita regarding mailing and redaction requirements (.10).	0.20

CHOI & ITOPage: 2
10-31-24Imperial Pacific International (CNMI) LLC
Creditors and ClaimsACCOUNT NO: 1815-04
INVOICE NO: 25064

10-22-24	AAI	Read USA Fanter POC.	0.10	
10-23-24	CCC	E-mail from Halegua re settlement and collection of gambling debts and review e-mails re settlement terms.	0.10	
	AAI	Read e-mail from Halegua regarding status of pending collection litigation against customers.	0.10	
10-24-24	CCC	E-mails with Chi re automatic stay and gambling debt issues.	0.10	
	AAI	Read notice of authorization of receiver filed by DOL to sell the Lot 463 parcels.	0.20	
10-28-24	CCC	Call from creditor re notice.	0.10	
10-31-24	CCC	Review proposed stipulation re proceeds of vehicle sale and compare to docket entries.	0.30	
		SUB TOTAL	4.10	\$1,740.00
FEE SUMMARY:				
	ATTORNEY	HOURS	RATE	TOTAL
	Chuck C. Choi	3.40	\$450.00	\$1,530.00
	Allison A. Ito	0.70	\$300.00	\$210.00
		STATE TAX		<u>81.99</u>
		TOTAL FEES		\$1,821.99
		TOTAL EXPENSES		<u>\$0.00</u>
		TOTAL CURRENT WORK		\$1,821.99

**CASINO LICENSE
MATTERS
(Client Matter# 1815-05)**

Chuck C. Choi
Allison A. Ito

700 Bishop Street
Suite 1107
Honolulu, Hawaii 96813

CHOI & ITO

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-05

INVOICE NO: 24953

RESPONSIBLE ATTY: CCC

RE:	Casino License Matters	HOURS	
04-24-24			
CCC	E-mail with Chi re monthly hearing and automatic stay issue (.20); call with Chen re casino and creditor matters (.70); call with Chi re hearing and housekeeping issues (.30); call with McDonald re settlement issues (.20); participate in commission monthly meeting (1.00); further call with Chen re timing issues (.20).	2.60	
04-25-24			
CCC	Review Chi e-mail to commission and call with Chen re same and creditor issues .	0.50	
04-30-24			
AAI	Read Commissioner's counteroffer to settle.	0.10	
05-03-24			
CCC	Review Chen e-mail re Casino License Agreement and review CLA (.30); call from Chen re declaratory relief complaint (.50).	0.80	
05-05-24			
CCC	Review Chen e-mails re casino license issues.	0.10	
05-06-24			
CCC	Review arbitration issues and demand to Governor.	0.10	
05-29-24			
CCC	Call with team re license and plan issues.	1.30	
05-31-24			
CCC	Call with UST re plan, sale, casino license issues.	0.40	
	SUB TOTAL	5.90	\$2,640.00

CHOI & ITO

Page: 2
05 -31-24

Imperial Pacific International (CNMI) LLC
Casino License Matters

ACCOUNT NO: 1815-05
INVOICE NO: 24953

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	5.80	\$450.00	\$2,610.00
Allison A. Ito	0.10	\$300.00	\$30.00
STATE TAX			<u>124.40</u>
TOTAL FEES			\$2,764.40
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$2,764.40

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-05

INVOICE NO: 24989

RESPONSIBLE ATTY: CCC

RE: Casino License Matters		HOURS	
06-02-24			
CCC	Review files and begin work on memo re plan options.	0.60	
06-05-24			
CCC	E-mails with AAI re schedules and prior hearing (.10); Work on memo to client (3.80).	3.90	
06-06-24			
CCC	Finish work on memo re POR and 363 options (4.50); call with team re memo (1.50).	6.00	
06-20-24			
CCC	Calls with consultant re plan and sale issues.	0.40	
06-23-24			
CCC	Review CCC agenda and e-mail Chi re meeting.	0.10	
06-27-24			
CCC	Review information re construction; e-mail Chi re due diligence.	0.30	
06-28-24			
CCC	Call with potential broker and committee re background and potential engagement (.60); prepare e-mail to client re diligence photos and footage (.10).	0.70	
06-29-24			
CCC	Review proposed engagement letter.	0.40	
SUB TOTAL		12.40	\$5,580.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL

CHOI & ITO

Page: 2
06 -30-24

Imperial Pacific International (CNMI) LLC
Casino License Matters

ACCOUNT NO: 1815-05
INVOICE NO: 24989

Chuck C. Choi	12.40	\$450.00	\$5,580.00
STATE TAX			<u>262.93</u>
TOTAL FEES			\$5,842.93
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$5,842.93

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-05

INVOICE NO: 25007

RESPONSIBLE ATTY: CCC

RE:	Casino License Matters	HOURS	
07-21-24			
CCC	Call with client re term sheet, license and litigation issues.	0.60	
07-30-24			
CCC	Prepare e-mail to Committee re license fee issue.	0.20	
08-04-24			
CCC	Call with team re professionals and casino license issues.	1.40	
	SUB TOTAL	2.20	\$990.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	2.20	\$450.00	\$990.00
	STATE TAX		<u>46.65</u>
	TOTAL FEES		\$1,036.65
	TOTAL EXPENSES		<u>\$0.00</u>
	TOTAL CURRENT WORK		\$1,036.65

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-05

INVOICE NO: 25033

RESPONSIBLE ATTY: CCC

RE: Casino License Matters

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY

HOURS

RATE

TOTAL

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$0.00

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-05

INVOICE NO: 25060

RESPONSIBLE ATTY: CCC

RE: Casino License Matters

HOURS

SUB TOTAL

0.00 \$0.00

FEE SUMMARY:

ATTORNEY HOURS

RATE

TOTAL

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$0.00

**ASSET DISPOSITION,
PLAN AND DISCLOSURE
STATEMENT
(Client Matter# 1815-06)**

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-06

INVOICE NO: 24954

RESPONSIBLE ATTY: CCC

RE: Asset Disposition, Plan and Disclosure Statement

HOURS

SUB TOTAL

0.00

\$0.00

FEE SUMMARY:

ATTORNEY

HOURS

RATE

TOTAL

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$0.00

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Allison A. Ito

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-06

INVOICE NO: 24990

RESPONSIBLE ATTY: CCC

RE:	Asset Disposition, Plan and Disclosure Statement	HOURS	
06-13-24			
CCC	E-mail to client re update (1.40); conference call with team re potential paths (1.50).	2.90	
AAI	Video conference with CCC, McDonald and client regarding plan options.	1.50	
06-26-24			
CCC	Call with client re sale issues and process.	1.00	
SUB TOTAL		5.40	\$2,205.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	3.90	\$450.00	\$1,755.00
Allison A. Ito	1.50	\$300.00	\$450.00
STATE TAX			<u>103.90</u>
TOTAL FEES			\$2,308.90
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$2,308.90

Chuck C. Choi
Allison A. Ito

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-06

INVOICE NO: 25008

RESPONSIBLE ATTY: CCC

RE:	Asset Disposition, Plan and Disclosure Statement	HOURS
07-01-24		
AAI	Video conference with CCC, McDonald and client regarding asset disposition.	1.00
07-09-24		
CCC	Begin work on 363 term sheet (1.00); call with consultant re sale issues (.50); call with AAI re construction consultant (.10).	1.60
07-10-24		
AAI	Telephone call with Brussow regarding construction cost estimate (.30); read Committee counsel's revisions to U.S. DOL's stipulation for relief from stay (.10).	0.40
07-12-24		
CCC	Further work on term sheet.	1.00
07-13-24		
CCC	Work on term sheet and prepare e-mail to client.	2.50
07-14-24		
CCC	Call with client re term sheet.	0.60
AAI	Review draft stalking horse term sheet (.20); video conference with CCC, McDonald & client re same (.70).	0.90
07-15-24		
CCC	E-mail re term sheet and make further revisions.	0.20
07-17-24		
CCC	Conference call with client re hearing and term sheet and insurance issues.	0.50

CHOI & ITOPage: 2
08 -31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25008

07-19-24		
CCC	Review client questions and respond re license and sale issues.	0.50
AAI	Video conference with CCC, Ordubegian and Wong regarding marketing status, realtor and stalking horse bid procedures.	0.40
07-21-24		
AAI	Video conference with CCC, McDonald re case status, insurance matters and stalking horse bid.	0.50
07-22-24		
AAI	Read e-mails from CCC and UST regarding UST's position on combined disclosure statement and plan where plan will propose to pay creditors in full plus interest.	0.10
07-23-24		
CCC	Revise term sheet and e-mails with Sit counsel and Committee counsel (.40); call with Committee counsel re same (.30).	0.70
07-24-24		
CCC	Calls with counsel for Sit re term sheet and process (.70); review arbitration demand and e-mails with Chen re license issues and review response (.40).	1.10
AAI	Read e-mail from Sit's counsel regarding potential bid for asset.	0.10
07-26-24		
CCC	Review marked up term sheet and forward to client.	0.10
AAI	Read committee's comments to 363 term sheet.	0.20
07-28-24		
CCC	Call with client re sale and insurance issues.	0.90
07-29-24		
CCC	Call with counsel for Sit re term sheet and changes.	0.60
07-30-24		
AAI	Work on bid procedures motion.	1.70
07-31-24		
AAI	Work on bid procedures motion (.90); work on motion to assume DPL Lease (1.70).	2.60

CHOI & ITOPage: 3
08-31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25008

08-01-24	CCC	Revise bid procedures motion (2.00); e-mail to client re update (1.20).	3.20
08-02-24	CCC	E-mail with counsel for Sit re procedures motion and hearing (.10); further edits to bid procedures motion and circulate (1.00).	1.10
08-04-24	AAI	Video conference with CCC, McDonald and client regarding collection of gambling debts, insurance, CCC and license issue, and further negotiation regarding PSA.	1.40
08-06-24	AAI	Revise motion to assume lease (.20).	0.20
08-07-24	CCC	Work on motion to assume and assign DPL lease (2.50); review edits to bid procedures motion and prepare e-mail to client re pending matters (.20); e-mails with Chi re various questions for motion to assume (.10).	2.80
08-08-24	CCC	Revise and finalize motion to assume and circulate (.40); revise bid procedures motion and circulate (.80); final edits to motions (.40); e-mail client re Committee position (.30).	1.90
	AAI	Read revisions from Committee Counsel to bid procedures motion and e-mails re marketing (.20); research regarding notice requirements bid procedures motions and confer with CCC re same (.20).	0.40
08-09-24	CCC	Finalize bid procedures motion and lease assumption motion, finalize term sheet (1.50); conferences with AAI re comments and questions (.10).	1.60
	AAI	Revise bid procedures motion and exhibits (.60); revise and finalize motion to assume lease (.40).	1.00
08-11-24	CCC	Review DPL lease assignment language (.20); call with client re sale and litigation issues (1.10); prepare pdf of final term sheet and e-mail to counsel (.10).	1.40
	AAI	Video conference with CCC and client.	1.10

CHOI & ITOPage: 4
08-31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25008

08-12-24		
CCC	Respond to client e-mail re purchaser entity (.20); prepare e-mail to Sit counsel (.10); call with Sit counsel and McDonald re strategy (.40).	0.70
08-13-24		
CCC	Revise NOH on bid procedures.	0.10
AAI	Prepare notice of hearing on bid procedures motion (.70); read e-mail from client regarding potential strategy regarding disposition (.20).	0.90
08-14-24		
CCC	Call with JP and McDonald re stalking horse issues.	0.40
AAI	Read e-mail from glass regarding stipulated briefing schedule on the motion to assume DPL lease (.10); prepare NOH on motion to assume DPL Lease (.40); draft purchase and sale agreement (2.00).	2.50
08-15-24		
CCC	E-mails re title report and IPP issue.	0.10
08-16-24		
AAI	Work on PSA and exhibits to the PSA.	3.70
08-17-24		
CCC	Revisions to PSA and circulate draft to client.	1.80
08-18-24		
CCC	Call with client re terms of PSA and strategy.	1.00
AAI	Video conference with CCC, McDonald, and client regarding draft purchase agreement.	1.00
08-19-24		
CCC	E-mails re Clear sale (.10); work on revisions to PSA (.90).	1.00
08-20-24		
CCC	Respond to e-mail from Mok re claims.	0.10
AAI	Read e-mails from CCC and Mok regarding carving out claims from the asset purchase agreement.	0.20

CHOI & ITOPage: 5
08 -31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25008

08-21-24		
CCC	E-mails with CNMI counsel re briefing schedule on assumption motion.	0.10
08-22-24		
CCC	Review title report and review summary from AAI.	0.30
AAI	Review updated title reports for properties for DPL leased properties (.20); review six title reports properties subject to private lease and mortgages recorded against these lots (.60); summarize title reports and e-mail CCC re same (.20).	1.00
08-24-24		
AAI	Work on stipulation between Debtor and DPL regarding briefing schedule on motion to assume DPL lease.	0.60
08-26-24		
AAI	Read e-mails from CCC, Ordubegian and Halegua regarding allocation of purchase price among personal and real property (.20); read draft stipulation from Gray to extricate personal property from the sale to Sit (.20).	0.40
08-27-24		
CCC	Final edits to first draft of PSA and e-mails to buyer counsel and client.	1.70
08-28-24		
CCC	Review objections bid procedures motion (.20); call with Sit counsel re PSA terms (.80); conference call with client re objections to motion (1.00).	2.00
AAI	Video conference with CCC, McDonald and San Nicolas regarding draft purchase & sale agreement (.80); review notes from prior calls in preparation for call with committee counsel (.20); video conference with CCC, and Committee counsel regarding employment of professionals, marketing the going concern vs real estate, opposition to bid procedures motion and motion to assume lease (.80); research background of Committee's proposed investment banker (.10); video conference with CCC and client regarding bid procedures motion and marketing status (1.10); draft reply in support of bid procedures motion (1.40).	4.40
08-29-24		
CCC	Review and edit notice of hearing and e-mail CNMI counsel (.10); edit and circulate proposed stipulation (.10).	0.20

CHOI & ITOPage: 6
08-31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25008

AAI	Video conference with CCC and Keen Summitt regarding retention (.60); finalize notice of hearing on DPL lease for electronic submission (.30).	0.90	
08-30-24			
CCC	Review construction plan and forward to Keen-Summit for data room (.40); e-mails re UCC report and review prior report (.20); begin work on sale motion (2.00).	2.60	
AAI	Further work on reply in support of bid procedures motion.	1.40	
08-31-24			
CCC	Review motion and circulate accounting for vehicle sale (.20); further work on sale motion (1.80); conference call with Keen Summit and client re due diligence (.70); prepare e-mail to group re due diligence (.10); review photos and circulate (.10).	2.90	
SUB TOTAL		66.30	\$25,485.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	37.30	\$450.00	\$16,785.00
Allison A. Ito	29.00	\$300.00	\$8,700.00
STATE TAX			<u>1,200.85</u>
TOTAL FEES			\$26,685.85
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$26,685.85

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-06

INVOICE NO: 25034

RESPONSIBLE ATTY: CCC

	RE: Asset Disposition, Plan and Disclosure Statement	HOURS
09-01-24		
CCC	E-mail re photos and condition of property.	0.10
09-02-24		
CCC	Work on omnibus reply to objections to bid procedures (3.30); call with team re sale issues (1.10).	4.40
AAI	Finalize the reply in support of bid procedure motion (.60); video conference with CCC and client regarding Committee counsel's fees, asset disposition and due diligence, Hyatt sale (1.10).	1.70
09-03-24		
CCC	E-mail with client re DPL and CNMI distinction and review website.	0.20
AAI	Revise stipulation with Glass regarding briefing deadlines on Motion to Assume DPL Lease.	0.20
09-04-24		
CCC	Review Committee opposition to bid procedures motion.	0.20
AAI	Work on reply to Gray's opposition to bid procedures motion (1.20).	1.20
09-05-24		
AAI	Further revisions to reply to Gray's opposition to bid procedures motion.	0.70
AAI	Finalize stipulation with Commonwealth regarding Motion to Assume DPL Lease (.20); prepare proposed order approving stipulation regarding Motion to Assume DPL Lease and e-mail chambers re same (.50)	0.70

CHOI & ITOPage: 2
09-30-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25034

09-06-24

CCC Work on supplemental opposition to Gray filing (2.50); call with Sit 3.30
counsel re bid procedures motion and objections (.80).AAI Read creditor's committee's opposition to bid procedures motion 1.00
(.20); video conference with CCC, McDonald and San Nicolas
regarding proposed sale and case status (.80).

09-07-24

CCC Call with team re strategy and objections to procedures (.90); e-mail 1.00
re DPL counsel (.10).

09-08-24

CCC Further e-mail with Dotts re due diligence and e-mail with Keen re 1.90
same (.10); e-mail with Chi re Hyatt and due diligence info (.20);
prepare e-mail to Dotts (.20); prepare ex parte motion to shorten
time on Keen Summit application (1.30); call with AAI re changes
(.10).

09-09-24

CCC E-mail with Dotts re additional due diligence and identity of buyer 2.60
(.10); review Keen due diligence list and forward (.10); review
e-mail re deposition of buyer (.10); research 363(m) good faith issue
(1.00); call with Sit counsel re deposition issues (.50); call with
team re developments (.80).AAI Read data request from Bordwin for marketing (.20); review due 2.70
diligence material from client (.20); read e-mail from SanNicolas
regarding transaction and read e-mails from CCC and Dotts re NDA
(.10); read e-mails from client regarding DPL and Bordwin
regarding NDA form (.10); video conference with CCC, McDonald
and San Nicolas regarding status of bid proceures motion (.50);
video conference with CCC, McDonald and client regarding bid
procedures status and marketing status (.80); review motion to sell
vehicles (.10); revise NDA form (.70).

09-10-24

CCC Review overnight e-mail and attachments re deposition, subpoena 1.30
and jurisdiction issues (.20); locate and forward diligence list to
client (.10); call with buyer counsel re litigation issues (.30); review
and forward various e-mail re depo (.10); call and research re
service issues (.60).AAI Read Commonwealth's notice of deposition and for production of 2.60
documents and consider scope re same (.10); read e-mails from San
Nicolas and Halegua and case law on the issue of whether taking

CHOI & ITOPage: 3
09-30-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25034

depositions of witness located in Mainland China and Hong Kong (.20); research Commonwealth on the factors to grant motion to quash (.20); videoconference regarding notice of deposition of Sit (.30); work on reply to Committee's opposition to bid procedures motion (1.30); further video conference with CCC, McDonald and San Nicolas regarding notice of deposition (.50).

09-11-24

CCC Review overnight e-mails re deposition (.10); conference call with Keen re bid procedures and marketing issues (.50); review Bordwin e-mail and revise Bordwin declaration (.20); review redline calls with Bordwin to finalize declaration (.30); prepare Supplemental Reply to Committee opposition (5.00); e-mails to client and JP re concessions (.10); e-mails with Chi re Hyatt transaction (.10); e-mails and calls re Sit deposition and motion to quash (.50); review draft motion to quash (.20). 7.00

AAI Video conference with CCC and Keen-Summitt regarding reply to bid procedures motion and staufs of employment application (.50); video conference with co-counsel regarding pending discovery (.50); prepare declaration of H. Bordwin in support of bid procedures motion, justifying acceptance of stalking horse bid and marketing efforts (.70); read assignment of Hyatt Lease to MB Capitol (.20). 1.90

09-12-24

AAI Review comments from client regarding data request and read e-mails from Halegua and CCC regarding Halegua's request to continue the hearing on bid procedures motion. 0.20

09-13-24

CCC E-mails with Halegua and JP re continuance (.10); review due diligence summary from client and forward to Keen (.20); call with client re status and continuance (.90); e-mails to counsel and Keen re Hyatt price (.10); revise position statement re Clear motion (.10). 1.40

AAI Work on due diligence folders (.30); video conference with CCC, McDonald and client regarding bid procedures motion and Keen Summitt employment application (.90); finalize statement regarding vehicle sales for electronic submission (.20). 1.40

09-14-24

CCC E-mails with Bordwin and local counsel re Hyatt transaction, hearing and appearance and e-mails re UCC lien report. 0.20

CHOI & ITOPage: 4
09-30-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25034

AAI	Work on sale motion (2.10); research NMI law regarding foreclosure of tax liens (.30); read comments from Bordwin regarding terms of Hyatt sale (.10).	2.50
09-15-24		
CCC	Review OSC and motion filed by Halegua (.30); respond to multiple e-mails re scheduling (.10); confer with team re opposition to OSC (.40).	0.80
09-16-24		
CCC	Review orders rescheduling hearing and setting deadlines (.10); call with Bordwin re marketing issues (.20); due diligence call with Keen-Summit (.50); call with team re new deadlines and OSC issue (.80).	1.60
AAI	Read order to show cause regarding deposition of Loi Lam Sit and underlying correspondence and motion (.20); read order scheduling hearing on bid procedures motion and related deadlines (.20); analyze UCC report and prepare exhibit to sale motion (.30); read e-mail from client regarding expired permits and review same and read e-mail from Ordubegian with request for information regarding Keen-Summit engagement (.20); video conference with CCC, client and Keen Summit regarding due diligence (.50); video conference re deadline and osc (.80).	2.20
09-17-24		
CCC	Review redlines to term sheet (.10); call with team re sale and litigation issues (.90); edits to reply (1.20); revise NDA and send to Dotts(.20); various e-mails re request for confidentiality (.10).	2.50
AAI	Prepare revised termsheet per the terms of the reply and record (.30); prepare submission of redlined termsheet (.40); review record regarding Sit and representations of counsel in the record (.30); review and comment on response to order to show cause (.20); video conference with team re Sit issues (.90); read e-mails from Dotts and brokers regarding terms of NDA agreement and consider disclosure issues (.10).	1.90
09-18-24		
CCC	Final review of revised term sheet and e-mail re same (.10); call with client and team re creditor requests (.90); call with Hon re update (.40).	1.40
AAI	Prepare submission of term sheet (.30); video conference with CCC, client and team regarding negotiations with Halegua and employment of investment broker (.90).	1.20

CHOI & ITOPage: 5
09-30-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25034

09-19-24

CCC E-mails with client re OSC and sale issues (.20); prepare e-mail to client re status (.90). 1.10

AAI Review and comment on stipulation to continue hearing on OSC (.10); read e-mails from CCC and client re same (.10); e-mail McDonald requesting file-stamped copies of various UCCs and read file-stamped order granting continuance on OSC to Mr. Sit (.10). 0.30

09-20-24

CCC Review Clear Motion to pay expenses and AAI summary. 0.20

AAI Read Clear's motion to pay commission and expenses and summarize same for client. 0.30

09-23-24

CCC E-mails with Halegua re scheduling and call with Halegua and bankruptcy counsel re sale issues (.80); review supplemental oppositions to bid procedures (.20). 1.00

09-24-24

CCC Review e-mail re White NDA revisions and respond (.20); review filings and prepare status e-mail to client (1.30); call with McDonald re status and DPL (.30). 2.40

AAI Read e-mail from CCC summarizing comments from Halegua on the asset valuation (.20); read comments from Keen-Summit on opposition bid procedures motion and KeenSummit employment application (.10). 0.30

09-25-24

CCC Call with Keen re objections/comments to bid procedures motion (.30); work on supplemental reply (3.30); conference with team re litigation and bid issues (1.00). 4.60

AAI Video conference with CCC and Keen regarding responses to oppositions to bid procedures motion (.30); further revise supplemental reply in support of bid procedures motion (1.40). 1.70

09-26-24

CCC Review Halegua e-mail and proposed stipulation and respond; circulate to client (.20); organize filings and forward to Keen and client (.20). 0.40

09-30-24

CCC Review various briefs and prepare for hearing (2.60); call with JP re 6.30

CHOI & ITOPage: 6
09-30-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25034

Sit issues (.20); participate in hearing on bid procedures and professional employment (3.50).

AAI Attend hearing on motion to extend proof of claim deadline, bid 3.20
procedures motion, applications to employ Keen Summit,
Application to employ Intrepid (3.20).

SUB TOTAL 73.80 \$29,025.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	45.90	\$450.00	\$20,655.00
Allison A. Ito	27.90	\$300.00	\$8,370.00

STATE TAX 1,367.66

TOTAL FEES \$30,392.66

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK \$30,392.66

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-06

INVOICE NO: 25046

RESPONSIBLE ATTY: CCC

RE:	Asset Disposition, Plan and Disclosure Statement	HOURS
10-01-24		
CCC	Call with Halegua re hearing (.50); review e-mails re bid procedures and respond (.10); call with team re hearing outcome and next steps (1.30).	1.90
AAI	Video conference with CCC, McDonald and client regarding hearing on bid procedures motions and next steps.	1.30
10-02-24		
CCC	Review summary of due diligence information and conference call with Intrepid and Committee (.80); call with Sit counsel re next steps (.20).	1.00
10-03-24		
CCC	E-mails with Intrepid re NDA (.10); review Intrepid diligence list (.10); call with client re Intrepid call and next steps (.90).	1.10
AAI	Video conference with CCC and client recapping call with Intrepid and next steps (.90); review list from Intrepid and forward to client with instructions re same (.30).	1.20
10-04-24		
CCC	E-mails with committee re Halegua proposal.	0.10
AAI	Read e-mails from committee counsel regarding disposition of vehicles and sale proceeds.	0.10
10-07-24		
CCC	Review e-mails from Intrepid and Committee counsel re due diligence.	0.20
AAI	Read e-mail from Comstock and follow up with Chi regarding additional due diligence materials (.10); read Committee counsel's	0.40

CHOI & ITOPage: 2
10-31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25046

	addition to due diligence and e-mail CCC re same (.10); review additional due diligence materials from client (.20).	
10-10-24		
CCC	Conference call with team re status of Intrepid efforts and litigation.	1.00
AAI	Video conference with CCC, co-counsel and client regarding upcoming motion to compel and strategy.	1.00
10-14-24		
CCC	E-mails with Intrepid re due diligence.	0.10
10-15-24		
AAI	Read e-mail from Intrepid regarding documents for due diligence.	0.10
10-16-24		
CCC	Review e-mails re settlement; respond to query re marketing materials and circulate AAI follow up to Intrepid.	0.10
AAI	Read e-mails from CCC and Bordwin regarding marketing materials (.10); e-mail Comstock for status on marketing materials and due diligence room (.10).	0.20
10-18-24		
CCC	Call with client and team re status of diligence, litigation.	0.70
AAI	Video conference with CCC, co-counsel and client regarding due diligence materials / Intrepid, and settlement agreement regarding the contempt proceeding.	0.70
10-19-24		
CCC	Review Intrepid e-mail and attachment re potential acquirors (.10); review memo decisions re bid procedures and conversion motions (.20); prepare detailed e-mail to client re strategy (.50).	0.80
AAI	Read e-mail from Comstock regarding status and read solicitation list.	0.10
10-25-24		
CCC	Review intrepid marketing material.	0.50

CHOI & ITOPage: 3
10-31-24Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06
INVOICE NO: 25046

AAI	Read draft marketing materials.	0.30	
10-27-24			
CCC	Call with team re status of various matters (1.00); respond to e-mail request (.80).	1.80	
AAI	Video conference with CCC, co-counsel and client regarding bankruptcy case status, marketing status, and DOL receivership.	1.00	
10-28-24			
AAI	Read e-mail from CCC regarding comments on draft marketing material.	0.10	
10-29-24			
CCC	Review e-mail re personal property values and e-mails re follow up call (.10); call with counsel re security and budget issues (.80); call with Halegua re status of marketing and Clear issues (.30).	1.20	
10-30-24			
CCC	Call with Intrepid re update and status (.60); review Comstock e-mail and respond and prepare e-mail to client with summary (.60); review Chi response to questions and prepare e-mail to Comstock (.10) .	1.30	
AAI	Prepare for call (.10); research files regarding 2019 financials (.30); video conference with CCC and Intrepid re marketing material and status (.50).	0.90	
10-31-24			
CCC	E-mail from Intrepid and review client response and videos and forward to Intrepid.	0.20	
SUB TOTAL		19.40	\$7,620.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	12.00	\$450.00	\$5,400.00
Allison A. Ito	7.40	\$300.00	\$2,220.00
STATE TAX			<u>359.05</u>
TOTAL FEES			\$7,979.05

CHOI & ITO

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10 -31-24

Imperial Pacific International (CNMI) LLC
Asset Disposition, Plan and Disclosure Statement

ACCOUNT NO: 1815-06
INVOICE NO: 25046

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK **\$7,979.05**

LITIGATION

(Client Matter# 1815-07)

Chuck C. Choi
Allison A. Ito

700 Bishop Street
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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

May 31, 2024

ACCOUNT NO: 1815-07

INVOICE NO: 24955

RESPONSIBLE ATTY: CCC

RE:	Litigation	HOURS
04-26-24		
CCC	Review e-mails from Chen re docket entries in Saipan cases and call with Chen re surreply (.20); e-mails re substitution and Gray litigation (.10); further research re exception to stay and begin work on drafting RFS section (1.00).	1.30
04-27-24		
CCC	Further review of Ninth Circuit cases and work on automatic stay brief (1.80); e-mail with client re same (.40).	2.20
04-28-24		
CCC	Finalize automatic stay pleading (1.30); call with team re litigation issues (1.00); follow up e-mails to Chen re 4001 and 362(k) order (.30).	2.60
AAI	Video conference with CCC, McDonald, Chen and client regarding pending litigation and schedules.	1.00
04-29-24		
CCC	Call with McDonald and Chen re hearing and substitution issues (.30); listen to hearing (.80); follow up e-mails with Chen re same (.10).	1.20
04-30-24		
CCC	Review e-mails re CNMI Supreme Court decision and further litigation (.10); review cases re 362(d)(4) issues and summaries (1.70).	1.80
05-01-24		
CCC	Further research and prepare supplemental brief re automatic stay (3.50); call with Chen re questions re Gray lawsuit and motions to dismiss (.10); further e-mails with Chen and McDonald re distinguishing cases (.20); review cases and prepare summaries for brief (1.00); conference call with team re litigation issues (1.10).	5.90

CHOI & ITOPage: 2
05-31-24Imperial Pacific International (CNMI) LLC
LitigationACCOUNT NO: 1815-07
INVOICE NO: 24955

AAI	Video conference with CCC, Chen, McDonald and client regarding Commission, pending litigation.	1.10
05-02-24		
CCC	Review MNI S Ct rules (.10); e-mails with Chen and confer with AAI re application to appear remotely (.10); prepare for hearing on automatic stay issue (.70); participate in hearing (1.30); follow up call with team re litigation issues (1.20).	3.40
AAI	Draft request for CCC to appear at OSC hearing remotely and proposed order re same (.40); prepare demand letter to Clear Management for turnover of Debtor's personal property (1.30); video conference with CCC and client regarding litigation strategy (1.20).	2.90
05-03-24		
AAI	Read 9th circuit appeals briefs (.30); read e-mail regarding suspension of license fee and consideration of obtaining clarification order (.10).	0.40
05-05-24		
CCC	Call with client and team re litigation and casino license issues.	1.20
AAI	Video conference with CCC, McDonald, Chen and client regarding litigation issues, receivership matters and Halegua letter (1.50); further call with CCC re same (.10).	1.60
05-06-24		
CCC	Review draft letter to governor re license arbitration (.10); call with group re arbitration and fee issues (.90).	1.00
AAI	Read draft objection to inventory list and client's comments re same (.10); video conference with CCC, McDonald, Chen and client regarding litigation matters and response to Halegua (1.00); read order vacating oral argument in 9th circuit appeals proceeding (.10).	1.20
05-07-24		
CCC	Call with client and team re license fee issues.	1.60
CCC	Call with Chen re writ and priority issues.	0.40
AAI	Research case law where court grants relief from stay to debtor to pursue appeal of an adverse judgment prepetition (1.70); work on	4.40

CHOI & ITOPage: 3
05 -31-24Imperial Pacific International (CNMI) LLC
LitigationACCOUNT NO: 1815-07
INVOICE NO: 24955

	motion for relief from automatic stay (1.20); video conference with CCC, McDonald and client regarding litigation options, CCC issues and other considerations (1.50).	
05-08-24	CCC	Conference call with team re litigation. 1.50
	AAI	Read cases cited by Halegua regarding automatic stay and interplay with the execution of writ of possession (.40); draft motion for relief from the automatic stay (1.20). 1.60
	AAI	Video conference with CCC, McDonald, Chen and client regarding litigation status and case status. 1.50
05-13-24	AAI	Read Gray's motion for relief from stay and declarations of Halegua and Shepard and prepare summary of arguments for client. 1.10
05-14-24	AAI	Read Chi's comments on Shepard's declaration and commence drafting declaration (.20); research CNMI execution process and caselaw on when title passes during the execution process (.70); research Curtis factors denying relief from stay (.60); work on opposition to relief from stay motion (1.20); video conference with CCC, McDonald and client regarding relief from stay (1.40). 4.10
05-15-24	AAI	Additional research case law regarding when property subject to a writ is property of the bankruptcy estate (.70); meeting with CCC and MAO regarding opposition to relief from stay strategy (.80); research docket regarding intervention motion by Century Estates in the Gray case (.20); draft opposition to motion for relief from stay (5.70). 7.40
05-16-24	AAI	Further revision to opposition to motion for relief from stay (2.30); conference with MAO re same (.10); analyze DRT liens (.20); research laws and caselaw regarding scope of lien and priority of liens (.70); video conference with CCC, McDonald and client regarding opposition to relief from stay and DIP (1.00); review docket and read numerous pleadings in the Fanter proceeding regarding auctions 1-7 (.60). 4.90
05-17-24	CCC	E-mails with Chen and revisions to the 9th Circuit RFS motion. 1.00

CHOI & ITOPage: 4
05-31-24Imperial Pacific International (CNMI) LLC
LitigationACCOUNT NO: 1815-07
INVOICE NO: 24955

05-19-24				
CCC	Finalize and circulate RFS motion with exhibits (.40); review McDonald response re date and Chen comments (.10).	0.50		
05-20-24				
AAI	Revise coversheet to motion for relief from stay regarding 9th Circuit appeal.	0.20		
05-21-24				
CCC	Call with Chen re hearing and status of contempt proceeding (.10); review and circulate RFS decision and e-mail with UST re Committee (.20).	0.30		
AAI	Further revise opposition to Gray's motion for relief from automatic stay (.60); work on exhibits and comment on relief from stay motion to continue 9th circuit appeals proceedings (.20); incorporate comments into opposition to Gray's motion for relief from stay (.20).	1.00		
05-23-24				
AAI	Finalize opposition to Gray's motion for relief from automatic stay.	3.60		
05-24-24				
CCC	E-mails with McDonald re strategy.	0.10		
05-30-24				
AAI	Further revise statement of position regarding Genc relief from stay motion.	1.20		
	SUB TOTAL	65.20		\$23,460.00
FEE SUMMARY:				
ATTORNEY	HOURS	RATE		TOTAL
Chuck C. Choi	26.00	\$450.00		\$11,700.00
Allison A. Ito	39.20	\$300.00		\$11,760.00
	STATE TAX			<u>1,105.44</u>
	TOTAL FEES			\$24,565.44

CHOI & ITO

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Imperial Pacific International (CNMI) LLC
Litigation

ACCOUNT NO: 1815-07
INVOICE NO: 24955

TOTAL EXPENSES \$0.00

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

June 30, 2024

ACCOUNT NO: 1815-07

INVOICE NO: 24991

RESPONSIBLE ATTY: CCC

RE:	Litigation	HOURS	
06-03-24			
AAI	Read Gray's proposed stipulation and e-mails from McDonald, CCC, and Ordubegian regarding Gray's request for adjustments to relief from stay motion deadlines.	0.20	
06-17-24			
CCC	Review e-mail from Halegua re information and respond to e-mail from Chi re contempt matter and fees.	0.10	
06-18-24			
CCC	Review e-mails re contempt proceeding (.10); call with Chen re same and conflict issues (.20); prepare e-mail to client re same (.10).	0.40	
06-19-24			
CCC	Work on revisions to RFS reply to Gray (.80); circulate same and review Chen comments (.10); finalize reply (.70).	1.60	
AAI	Revise and finalize reply in support of motion for relief from stay to pursue appeal for electronic submission.	1.20	
06-20-24			
CCC	Review and revise opposition to Clear motions (2.00); review e-mails re contempt hearing and scheduling (.10).	2.10	
	SUB TOTAL	5.60	\$2,310.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	4.20	\$450.00	\$1,890.00
Allison A. Ito	1.40	\$300.00	\$420.00
	STATE TAX		108.85
	TOTAL FEES		\$2,418.85

CHOI & ITO

Imperial Pacific International (CNMI) LLC
Litigation

Page: 2
06 -30-24

ACCOUNT NO: 1815-07
INVOICE NO: 24991

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$2,418.85

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Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

August 31, 2024

ACCOUNT NO: 1815-07

INVOICE NO: 25009

RESPONSIBLE ATTY: CCC

RE: Litigation		HOURS	
07-11-24			
AAI	Read and respond to e-mail from Chen regarding minute order on Debtor's relief from stay motion to pursue appeal; commence drafting formal order re same.	0.40	
08-05-24			
CCC	Review e-mails re contempt proceeding.	0.10	
AAI	Review Gray's first document production and interrogatories to the Debtor & First document production requests and interrogatories to Chi.	0.30	
08-06-24			
CCC	Review e-mails re discovery in contempt proceeding and local counsel.	0.20	
08-08-24			
CCC	Review motion to waive local counsel and order.	0.10	
08-19-24			
CCC	Review and circulate response to demand for arbitration.	0.10	
SUB TOTAL		1.20	\$435.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	0.50	\$450.00	\$225.00
Allison A. Ito	0.70	\$300.00	\$210.00
STATE TAX			<u>20.50</u>
TOTAL FEES			\$455.50

CHOI & ITO

Imperial Pacific International (CNMI) LLC
Litigation

Page: 2
08-31-24
ACCOUNT NO: 1815-07
INVOICE NO: 25009

TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK **\$455.50**

Chuck C. Choi
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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

September 30, 2024

ACCOUNT NO: 1815-07

INVOICE NO: 25035

RESPONSIBLE ATTY: CCC

RE: Litigation

HOURS

09-13-24

CCC Review status report in contempt proceeding.

0.10

SUB TOTAL

0.10

\$45.00

FEE SUMMARY:

ATTORNEY

HOURS

RATE

TOTAL

Chuck C. Choi

0.10

\$450.00

\$45.00

STATE TAX

2.12

TOTAL FEES

\$47.12

TOTAL EXPENSES

\$0.00

TOTAL CURRENT WORK

\$47.12

Chuck C. Choi
Allison A. Ito

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CHOI & ITO

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Imperial Pacific International (CNMI) LLC

October 31, 2024

ACCOUNT NO: 1815-07

INVOICE NO: 25062

RESPONSIBLE ATTY: CCC

RE:	Litigation	HOURS	
10-21-24			
CCC	Review e-mails re settlement and scope of release; exchange e-mails with client and counsel.	0.30	
10-23-24			
CCC	Review proposed stipulated order and order re continuance of hearing.	0.10	
	SUB TOTAL	0.40	\$180.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	0.40	\$450.00	\$180.00
	STATE TAX		<u>8.48</u>
	TOTAL FEES		\$188.48
	TOTAL EXPENSES		<u>\$0.00</u>
	TOTAL CURRENT WORK		\$188.48

IN THE UNITED STATES DISTRICT COURT
FOR THE NORHERN MARIANA ISLANDS
BANKRUPTCY DIVISION

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor.

Case No. 1:24-BK-00002

**DECLARATION OF CHUCK C.
CHOI**

DECLARATION OF CHUCK C. CHOI

I, Chuck C. Choi, hereby declare under penalty of perjury that:

1. I am a partner at Choi & Ito (“Applicant”). I am competent to make this declaration and do so based on personal knowledge. I make this declaration in support of the *First Interim Fee Application of Choi & Ito, As Debtor’s General Bankruptcy Co-Counsel, For The Period April 18, 2024 To October 31, 2024* (the “Application”).

2. I have read the foregoing Application, and the contents thereof are true and accurate to the best of my knowledge, information, and belief.

3. No agreement or understanding exists between Applicant and any other person or firm for a division of the compensation requested herein.

4. The rates charged by Applicant are the same as are charged to non-bankruptcy clients by Applicant and are consistent with the rates approved by other Bankruptcy Courts in cases that were pending during the periods for which compensation is requested.

5. To the best of applicant’s knowledge, information and belief, the application conforms to the U.S. Trustee’s Guidelines, LBR 2016-1, and any order of the Court.

/ s/ Chuck C. Choi
Chuck C. Choi

hib_2016-1a (12/09)

Print name if original signature