

Michael Chen Law Offices
7330 Edna Ave.
Las Vegas, NV 89117
Pro Hac Vice

Special Litigation Attorney 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 MICHAEL
CHEN LAW OFFICE, AS
DEBTOR'S SPECIAL
LITIGATION COUNSEL, FOR
THE PERIOD APRIL 19, 2024 TO
OCTOBER 31, 2024; EXHIBIT A;
DECLARATION OF COUNSEL**

Hearing Date and Time

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

**FIRST INTERIM FEE APPLICATION OF MICHAEL CHEN LAW OFFICE,
AS DEBTOR'S SPECIAL LITIGATION COUNSEL, FOR THE PERIOD APRIL
19, 2024 TO OCTOBER 31, 2024**

Michael Chen Law Office (the "Applicant"), as special litigation counsel to
Imperial Pacific International (the "Debtor") in support of its first interim fee
application for the period April 18, 2024, to October 31, 2024, respectfully represents
as follows:

I. JURISDICTION AND VENUE

This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and



1 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper
 2 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3 This Application is brought pursuant to 11 U.S.C. § 328 and Rule 2002(a)(6) of
 4 the Rules of Bankruptcy Procedure.
 5

6 **II. BACKGROUND**

7 Applicant hereby incorporates in its entirety the “Background” and “Status of
 8 Bankruptcy” Sections of *First Interim Fee Application Of Choi & Ito, As Debtor’s*
 9 *Bankruptcy Co-Counsel For the Period April 19, 2024 Through September 30, 2024*,
 10 filed herein as docket #294.

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

16 On April 23, 2024, the Debtor filed its Application to Employ Applicant as
 17 special litigation counsel. *See* dkt. #13. On June 28, 2024, the Court entered its order
 18 approving Applicant’s retention effective as of April 19, 2024 in the following cases:
 19

- 20 a. Joshua Gray v. Imperial Pacific International (CNMI), LLC, Case No.
 21 1:19-cv- 00008, in the U.S. District Court for the District of the Northern
 22 Mariana Islands (the “Gray Lawsuit”)
 23
- 24 b. Joshua Gray v. Imperial Pacific International (CNMI), LLC, Case No. 23-
 25 15956, in the United States Court of Appeals for the Ninth Circuit (the “9th
 26 Circuit Appeal”)
 27
- 28 c. Imperial Pacific International (CNMI), LLC v. Commonwealth of the

Northern Mariana Islands, et al., Case No. 1:24-cv-00001, in the U.S. District Court for the District of the Northern Mariana Islands (the “Casino License Suspension Lawsuit”)

d. Imperial Pacific International (CNMI), LLC v. Commonwealth of the Northern Mariana Islands, et al., Case No. 1:24-cv-00002, in the U.S. District Court for the District of the Northern Mariana Islands (the “Regulatory Fee Lawsuit”)

e. Commonwealth Casino Commission Enforcement Action Nos. 21-002 and -0003 (the “CCC Enforcement Actions”)

See dkt. #146

In the year preceding the Petition, Applicant represented the Debtor in the Gray, Casino License Suspension, and Regulatory Fee Lawsuits, and in the 9th Circuit Appeal and the CCC Enforcement Actions.

Joshua Gray, Commonwealth Casino Commission (the “CCC”), and the Commonwealth have filed proofs of claim in the Debtor’s bankruptcy proceeding. *See* POC ## 15, 24, 25, 26.

III. SERVICES PROVIDED DURING PERIOD

The litigation services rendered by Applicant for the period April 19, 2024 through October 31, 2024 (“Application Period”), are itemized in the invoices which are attached as Exhibit “A” hereto and incorporated herein by reference.

Applicant requests approval for fees in the amount of \$57,680.00 computed as set forth and explained in Exhibit A. Applicant also incurred \$45.60 in actual and necessary expenses as set forth and explained in Exhibit A.

1 Applicant has received \$10,368.00 in fees, and \$45.60 in expenses on account of
2 its April-July, 2024 invoices pursuant to the interim fee procedures order in place in
3 this case.

4
5 During the Application Period, Applicant assisted the Debtor by providing
6 services in the following categories:

7 a. Gray Lawsuit (\$29,995.00). Services in this category included:

- 8 • Advice regarding contempt hearing.
- 9 • Attended hearing regarding order to show cause.
- 10 • Prepared response to Gray's request to lift automatic stay
- 11 with respect to the Gray Lawsuit.
- 12 • Prepared draft
- 13 • Attended hearing on 4order to show cause and contempt
- 14 hearing.
- 15 • Attend various status conferences and court hearings.
- 16 • Prepared discovery requests to Clear Management.
- 17 • Drafted response to discovery requests from Joshua Gray.
- 18 • Advised client regarding defense strategy in Gray Civil
- 19 Contempt proceeding.
- 20 • Reviewed motion to compel discovery filed by Gray

21 b. 9th Circuit Appeal (\$2,905.00). Services in this category included:

- 22 • Prepared notice of automatic stay.
- 23 • Prepare briefing regarding relief from automatic stay with
- 24 respect to the for 9th Circuit Appeal.
- 25 • Prepared status report for 9th Circuit Appeal.

26 c. Casino License Suspension Lawsuit (\$21,805.00). Services in this
27
28

category included:

- Reviewed motions to dismiss.
- Advised client regarding response to motion to dismiss.
- Drafted second amended complaint.
- Drafted motion for leave to file second amended complaint.
- Drafted opposition to motion to dismiss filed by the Commonwealth.
- Reviewed communications from the Commonwealth.

d. Regulatory Fee Lawsuit (\$2,030.00) Services in this category included:

- Prepared First Amended complaint.

e. CCC Enforcement Action (\$945.00) Services in this category included:

- Communicated with client regarding casino license issues.
- Attended CCC hearing.
- Drafted demand letter to CCC for resolution of license fees dispute.

IV. **FEES REQUESTED**

Applicant requests approval for fees in the amount of \$57,680.00 for the Application Period, as set forth and explained in Exhibit “A.” Applicant also incurred \$45.60 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.

1 Bankruptcy Code section 330(a)(1) authorizes the Court to award reasonable
2 compensation and reimbursement for actual, necessary expenses to a professional. 11

3 U.S.C. § 330(a)(1). Bankruptcy Code section 330(a)(3) provides:
4

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

7 (A) the time spent on such services;

8 (B) the rates charged for such services;

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

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

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

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

19 11 U.S.C. § 330(a)(3).

20 As detailed in Exhibit “A” hereto and the LBR 2016-1b Summary Sheet filed
21 herewith, the services provided by Applicant during the Application Period were
22 provided at a blended hourly rate of approximately \$350.00 by the Applicant’s
23 attorneys. Applicant submits that the hourly rates for services performed by its
24 attorneys, in this case, are reasonable. These rates are the same as are charged to non-
25 bankruptcy clients by Applicant and are consistent with the rates approved by other
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1 Bankruptcy Courts in cases that were pending during the periods for which
2 compensation is requested.

3 No agreement or understanding exists between the Applicant and any other
4 person regarding a division of any compensation to be received for services performed
5 in connection with this case.
6

7 WHEREFORE, Applicant prays that the Court enter an order: (a) allowing
8 Applicant, interim fees in the amount of \$57,680.00, and reimbursement of expenses in
9 the amount of \$45.60, for services provided during the Application Period, or such
10 other amounts as the Court shall deem fair and reasonable; and (b) granting such other
11 relief as the Court deems fair and just.
12

13 DATED: Los Angeles, California, November 6, 2024
14

15 /s/ Michael Chen

16 Michael Chen

17 Special Litigation Counsel for Debtor and
18 Debtor-in-Possession
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EXHIBIT

A



Michael Chen Law Offices, PLLC

Los Angeles Office: 2975 Huntington Dr. Ste 101, San Marino, CA 91108

Las Vegas Office: 7330 Edna Ave. Las Vegas, NV 89117

Client: Imperial Pacific International (CNMI), LLC

Invoice Date: November 1, 2024

For Professional Services Rendered Through October 31, 2024

Matter Reference	Services	Disbursements	Totals
00002 Gray v. IPI 9 th Circuit Appeal 23-15956	\$2,905.00	\$0.00	\$2,905.00
00012 Gray v. IPI 19-cv-00008	\$29,995.00	\$0.00	\$29,995.00
00031 IPI v. CCC. et. al. 24-cv- 00001	\$21,805.00	\$45.60	\$21,850.60
00094 CCC Enforcement Action 21- 002 and 21-003	\$945.00	\$0.00	\$945.00
00095 IPI v. CCC et. al. 24-cv- 00002	\$2,030.00	\$0.00	\$2,030.00
	\$57,680.00		\$57,725.60

Time Summary

<u>Attorney</u>	Hours	Rate	Value
Michael Chen	164.80	\$350.00	\$57,680.00

Disbursements Summary

Pacer Charge	\$45.60
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Michael Chen Law Offices**INVOICE**

7330 Edna Ave.
Las Vegas, Nevada 89117

Invoice # 186
Date: 10/29/2024
Due On: 11/28/2024

IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

00002-IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC**Joshua Gray v. Imperial Pacific International (CNMI), LLC, Case No. 23-15956, in the United States Court of Appeals for the Ninth Circuit**

Type	Date	Notes	Quantity	Rate	Total
Service	04/30/2024	Efile Documents: Prepare Notice of Automatic Stay and efile it with the 9th Circuit	0.30	\$350.00	\$105.00
Service	05/01/2024	Draft Motion: Draft Supplemental Brief re automatic stay, Efile	0.80	\$350.00	\$280.00
Service	05/02/2024	Conference call with Co-Counsel: Conference call with Co-counsel on pending litigations, 9th Circuit appeal, Gray Case approach, litigation with CCC	1.20	\$350.00	\$420.00
Service	05/03/2024	Conference call with Co-Counsel: Conference Call with Chuck Choi and McDonalds about response to Aaron Halegua's letter, 9th Circuit Appeal	1.00	\$350.00	\$350.00
Service	05/05/2024	Review Case Materials: Review Motions to Dismiss filed by Defendants in 24-cv-00002 case	3.30	\$350.00	\$1,155.00
Service	05/06/2024	Review Case Materials: Review and File Court's Order ECF 31 re Automatic Stay and Case off calendar	0.10	\$350.00	\$35.00
Service	06/26/2024	Attend Court Hearing: Attend lift of stay motion for 9th Circuit Appeal, DIP Financing Motion	1.20	\$350.00	\$420.00
Service	07/29/2024	Draft Pleadings: Draft and file status report with 9th Circuit on the lift of stay granted by BK Court	0.30	\$350.00	\$105.00
Service	08/28/2024	Review Case Materials: Review and File Court Order re lift of the stay and case recalendaring	0.10	\$350.00	\$35.00
				Total	\$2,905.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
186	11/28/2024	\$2,905.00	\$0.00	\$2,905.00
Outstanding Balance				\$2,905.00
Total Amount Outstanding				\$2,905.00

Please make all amounts payable to: Michael Chen Law Offices

Please pay within 30 days.

Michael Chen Law Offices**INVOICE**

7330 Edna Ave.
Las Vegas, Nevada 89117

Invoice # 187
Date: 10/31/2024
Due On: 11/30/2024

IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

00012-IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

Joshua Gray v. Imperial Pacific International (CNMI), LLC, Case No. 1:19-cv-00008, in the U.S. District Court for the District of the Northern Mariana Islands

Type	Date	Notes	Quantity	Rate	Total
Service	04/25/2024	Conference call with Co-Counsel: Conference Call with Chuck Choi and Chuck McDonald about CCC Negotiation, Respond to Gray Case Contempt Hearing	1.60	\$350.00	\$560.00
Service	04/28/2024	Review Case Materials: Review case materials related to contempt hearing	0.40	\$350.00	\$140.00
Service	04/28/2024	Draft Motion: Draft and File Motion and Brief Surreply to Petition for OSC against IPI and Chi	1.60	\$350.00	\$560.00
Service	04/29/2024	Attend Court Hearing: Attend Court Hearing on Contempt OSC	1.50	\$350.00	\$525.00
Service	05/01/2024	Conference call with Co-Counsel: Conference call with client and co-counsel on litigation matters, related to Gray OSC and 9th Circuit Appeal, preparing for OSC hearing	1.20	\$350.00	\$420.00
Service	05/02/2024	Attend Court Hearing: Attend Court Hearing for OSC, re Automatic Stay	1.10	\$350.00	\$385.00
Service	05/04/2024	Review Case Materials: Review case materials and draft email to opposing counsel on inventory list of vehicles filed by Clear	0.60	\$350.00	\$210.00
Service	05/06/2024	Draft Response to Demand Letter: Draft response letter to Aaron Halegua re his demand for stipulation for lift of automatic stay	1.40	\$350.00	\$490.00
Service	05/06/2024	Draft Motion: Draft Opposition to Vehicle Inventory List filed by Clear Management, declaration of Howyo Chi, Efile Documents	4.20	\$350.00	\$1,470.00
Service	05/29/2024	Attend Court Hearing: Attend Gray v. IPI Status Conference, DIP motion, Lift Stay Motion	3.00	\$350.00	\$1,050.00
Service	06/18/2024	Review Case Materials: Review draft pretrial order and	1.20	\$350.00	\$420.00

		respond to email from Halegua on Gray v. IPI Civil Contempt Hearing			
Service	06/18/2024	Conference call with Co-Counsel: Prepare for status report re Gray v. IPI Civil Contempt	1.00	\$350.00	\$350.00
Service	06/19/2024	Review Case Materials: Review and Modify Reply to Opposition to Motion to Lift Stay	0.40	\$350.00	\$140.00
Service	06/20/2024	Conference Call with Opposing Counsel: Email exchange with Halegua about Civil Contempt Hearing	0.40	\$350.00	\$140.00
Service	06/20/2024	Review Case Materials: Review Opposition to Clear's Motion and Provide Editing	0.80	\$350.00	\$280.00
Service	06/20/2024	Attend Court Hearing: Attend IPI Bankruptcy DIP Hearing, Grayg OSC Hearing	1.50	\$350.00	\$525.00
Service	06/20/2024	Attend Court Hearing: Attend Court Hearing related to case status update, contempt hearing	1.20	\$350.00	\$420.00
Service	07/17/2024	Attend Court Hearing: Attend Court Hearing at CNMI Court	1.50	\$350.00	\$525.00
Service	07/17/2024	Attend Court Hearing: Attend Court Status Conference	1.40	\$350.00	\$490.00
Service	07/19/2024	Draft Disclosures Files: Draft Response Files for Civil Contempt Hearing	4.80	\$350.00	\$1,680.00
Service	07/22/2024	Draft Response to Demand Letter: Draft responses, statement of uncontroverted facts, issues to be tried	1.40	\$350.00	\$490.00
Service	08/01/2024	Review Case Materials: Review proposed statement of uncontroverted facts, prepare response to Halegua	1.40	\$350.00	\$490.00
Service	08/03/2024	Response to Discovery Requests: Response to Discovery Requests from Halegua re civil contempt	2.30	\$350.00	\$805.00
Service	08/04/2024	Prepare Discovery Requests to Opposing Parties: Prepare discovery interrogatories for civil contempt	2.40	\$350.00	\$840.00
Service	08/05/2024	Response to Discovery Requests: Response to discovery requests from Halegua	2.50	\$350.00	\$875.00
Service	08/06/2024	Prepare Discovery Requests to Opposing Parties: Prepare RFPE and RFA to Clear	4.20	\$350.00	\$1,470.00
Service	08/06/2024	Prepare Discovery Requests to Opposing Parties: Prepare discovery requests to Clear Management re Civil Contempt	4.20	\$350.00	\$1,470.00
Service	08/07/2024	Draft Motion: Draft Motion for Waiver of Local Counsel, Declaration	3.60	\$350.00	\$1,260.00
Service	08/07/2024	Draft email to Opposing Counsel: email exchange with opposing counsel Michael White to stipulate to discovery response extension	0.40	\$350.00	\$140.00

Service	08/07/2024	Draft email to Opposing Counsel: Email Exchange with Halegua for extension of time to respond	0.40	\$350.00	\$140.00
Service	08/08/2024	Draft Motion: Draft Stipulation and proposed order for extension to respond to discovery requests.	0.60	\$350.00	\$210.00
Service	08/08/2024	Draft Motion: Draft Proposed Order re stipulation	0.60	\$350.00	\$210.00
Service	08/08/2024	Draft Motion: Prepare and File Stipulated Motion to extend time for response to discovery	0.80	\$350.00	\$280.00
Service	08/13/2024	Attend Court Hearing: Attend Status Conference and Bankruptcy Hearing	1.50	\$350.00	\$525.00
Service	08/13/2024	Attend Court Hearing: Attend court status conference	1.40	\$350.00	\$490.00
Service	08/13/2024	Attend Court Hearing: Attend status conference	1.60	\$350.00	\$560.00
Service	08/27/2024	Conference call with Co-Counsel: Conference call with Co-Counsel McCollum re hard drive	0.20	\$350.00	\$70.00
Service	08/29/2024	Response to Discovery Requests: Review Interrogatories from Joshua Gray, Prepare Interrogatories Responses	2.40	\$350.00	\$840.00
Service	08/29/2024	Conference Call with Client: Conference Call with Chi, McCollum on responding to discovery requests	1.40	\$350.00	\$490.00
Service	08/29/2024	Conference Call with Client: Conference call with Chi and McCollum, preparing for interrogatory responses	1.40	\$350.00	\$490.00
Service	09/01/2024	Conference Call with Client: Zoom Meeting with IPI Security Guards, prepare for response to discovery for civil contempt	2.20	\$350.00	\$770.00
Service	09/01/2024	Conference Call with Client: Meeting with IPI security personnel Darlene Cabrera and Nikki Ada, going over interrogatory responses.	1.70	\$350.00	\$595.00
Service	09/03/2024	Prepare Discovery Requests to Opposing Parties: Prepare answer to interrogatories in civil contempt hearing	1.80	\$350.00	\$630.00
Service	09/03/2024	Response to Discovery Requests: Prepare responses to special interrogatories	1.60	\$350.00	\$560.00
Service	09/05/2024	Prepare Discovery Requests to Opposing Parties: Prepare discovery requests to RFPD in civil contempt hearing	1.60	\$350.00	\$560.00
Service	09/12/2024	Conference Call with Opposing Counsel: Meet and Confer re Discovery deficiencies for IPI v. Gray Civil Contempt	2.10	\$350.00	\$735.00
Service	09/15/2024	Conference call with Co-Counsel: Conference call with Co-Counsels re Petition for OSC	0.40	\$350.00	\$140.00
Service	09/23/2024	Response to Discovery Requests: Prepare first draft of	1.80	\$350.00	\$630.00

		Defendant's supplemental interrogatory responses and request for production of documents			
Service	09/25/2024	Conference call with Co-Counsel: Conference Call with Co-Counsel and Client, Discussing Gray Civil Contempt Proceeding Defense Strategy	1.10	\$350.00	\$385.00
Service	09/30/2024	Conference Call with Client: Conference Call with Client on defending civil contempt charge, review evidence, discovery requests.	0.80	\$350.00	\$280.00
Service	10/11/2024	Review Case Materials: Review Motion to Compel Discovery by Halegua ECF No. 339	1.60	\$350.00	\$560.00
Service	10/16/2024	Review and Analyze Contract: Review draft settlement agreement from Halegua	1.20	\$350.00	\$420.00
Service	10/25/2024	Review Case Materials: Review Civil Contempt Settlement Agreement	1.40	\$350.00	\$490.00
Service	10/29/2024	Conference Call with Opposing Counsel: Conference Call with Clear, Halegua, Choi, Chi on IPI security practice	0.90	\$350.00	\$315.00
				Total	\$29,995.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
187	11/30/2024	\$29,995.00	\$0.00	\$29,995.00
			Outstanding Balance	\$29,995.00
			Total Amount Outstanding	\$29,995.00

Please make all amounts payable to: Michael Chen Law Offices

Please pay within 30 days.

Michael Chen Law Offices**INVOICE**

7330 Edna Ave.
Las Vegas, Nevada 89117

Invoice # 185
Date: 10/29/2024
Due On: 11/28/2024

IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

00031-IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC**Imperial Pacific International (CNMI), LLC v. Commonwealth of the Northern Mariana Islands, et al., Case No. 1:24-cv-00001**

Type	Date	Notes	Quantity	Rate	Total
Service	04/25/2024	Review Case Materials: Review Motions to Dismiss in the 24-00001 Case	1.20	\$350.00	\$420.00
Service	04/28/2024	Conference call with Co-Counsel: Conference call with Chuck Choi and McDonald's on handling of cases against CCC, CNMI	1.00	\$350.00	\$350.00
Service	04/29/2024	Conference call with Co-Counsel: Conference Call with Co-Counsel on Gary Case Automatic Stay Response, consulting with bankruptcy counsels on CCC MTDs	1.00	\$350.00	\$350.00
Service	05/03/2024	Review Case Materials: Review Motions to Dismiss filed by defendants in IPI v. CNMI. 24-cv-00001 case, review stipulation to dismiss for Andrew Yeom	3.00	\$350.00	\$1,050.00
Service	05/03/2024	Review Case Materials: Review motions to dismiss for 24-cv-00001, research legal issues raised in the MTDs	3.60	\$350.00	\$1,260.00
Service	05/03/2024	Conference Call with Client: Conference call with Chi on response to Motions to Dismiss	0.40	\$350.00	\$140.00
Service	05/03/2024	Conference call with Co-Counsel: Conference with Choi on SAC to 24-cv-00001	0.50	\$350.00	\$175.00
Service	05/03/2024	Draft Motion: Draft Motion to Extend Time to Respond, Draft Proposed Order for 24-cv-00001	1.40	\$350.00	\$490.00
Service	05/07/2024	Draft Pleadings: Draft SAC for 24-cv-00001	4.40	\$350.00	\$1,540.00
Service	05/07/2024	Conference call with Co-Counsel: Conference Call with Choi, Chi and McDonald to discuss recent offer by Arron Halegua, Litigation strategy with CNMI and Governor's Office	1.20	\$350.00	\$420.00
Service	05/08/2024	Draft Complaint: draft SAC for 24-cv-00001 case, draft motion for leave to file SAC	4.20	\$350.00	\$1,470.00
Service	05/16/2024	Draft Motion: Draft Opposition to MTD by CNMI	3.80	\$350.00	\$1,330.00

Service	05/16/2024	Draft Motion: Draft Opposition to MTD by CCC and Commissioners	2.80	\$350.00	\$980.00
Service	05/16/2024	Draft Opposition to Motion: Draft Opposition to MTD by Governor	1.60	\$350.00	\$560.00
Service	05/16/2024	Draft Motion: Draft SAC and Motion to File SAC, Final Review	2.20	\$350.00	\$770.00
Service	05/16/2024	Efile Documents: Efile Oppositions to MTDs, SAC	0.60	\$350.00	\$210.00
Service	08/11/2024	Legal Research: legal research on Rule 11 sanction motion	2.40	\$350.00	\$840.00
Service	08/18/2024	Conference Call with Client: Conference Call with Client, address issues related to Motion to Dismiss filed by CNMI government	1.30	\$350.00	\$455.00
Service	08/20/2024	Review Case Materials: Review letter from Governor's Office	0.40	\$350.00	\$140.00
Service	08/20/2024	Conference Call with Client: Conference Call with Johnny and Chi re Governor's Office response to Presentation of Dispute	1.00	\$350.00	\$350.00
Service	08/24/2024	Draft Motion: Review, research and draft opposition to CNMI, Governor's MTDs	8.00	\$350.00	\$2,800.00
Service	08/25/2024	Draft Opposition to Motion: Draft Opposition to Motion to Dismiss by CNMI, Palacios	8.00	\$350.00	\$2,800.00
Service	08/26/2024	Draft Motion: Draft Motion for Leave to file TAC, Final Review of Documents, Email Documents	2.40	\$350.00	\$840.00
Service	09/09/2024	Conference Call with Client: Conference Call with IPI and Co-Counsels, pending litigation with CCC and CNMI Government	1.10	\$350.00	\$385.00
Service	09/16/2024	Draft Motion: Review Oppositions to Motion for Leave to Amend SAC, Draft Reply ISO Motion for Leave to Amend SAC	4.80	\$350.00	\$1,680.00
				Total	\$21,805.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
176	10/09/2024	\$9,075.60	\$0.00	\$9,075.60

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
185	11/28/2024	\$21,805.00	\$0.00	\$21,805.00
Outstanding Balance				\$30,880.60
Total Amount Outstanding				\$30,880.60

Please make all amounts payable to: Michael Chen Law Offices

Please pay within 30 days.

Michael Chen Law Offices

7330 Edna Ave.
Las Vegas, Nevada 89117

INVOICE

Invoice # 183
Date: 10/29/2024
Due On: 11/28/2024

IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

00094-IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC**Commonwealth Casino Commission Enforcement Action Nos. 21-002 and -0003**

Type	Date	Notes	Quantity	Rate	Total
Service	04/24/2024	Conference call with Co-Counsel: Conference Call with Co-Counsel on Issues related to settlement discussion with CCC, Pending Motions before CNMI Court	0.80	\$350.00	\$280.00
Service	04/24/2024	Attend Motion Hearing: Attend CCC Monthly Hearing, present position of IPI for settlement discussion	0.70	\$350.00	\$245.00
Service	05/06/2024	Draft Demand Letter: Draft demand letter for dispute resolution with CNMI for annual license fees	1.20	\$350.00	\$420.00
				Total	\$945.00

Detailed Statement of Account**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
183	11/28/2024	\$945.00	\$0.00	\$945.00
Outstanding Balance				\$945.00
Total Amount Outstanding				\$945.00

Please make all amounts payable to: Michael Chen Law Offices

Please pay within 30 days.

Michael Chen Law Offices

INVOICE

7330 Edna Ave.
Las Vegas, Nevada 89117

Invoice # 184
Date: 10/29/2024
Due On: 11/28/2024

IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

00095-IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC

Imperial Pacific International (CNMI), LLC v. Commonwealth of the Northern Mariana Islands, et al., Case No. 1:24-cv-00002

Type	Date	Notes	Quantity	Rate	Total
Service	05/07/2024	Draft Pleadings: Draft FAC for 24-cv-00002 Case	3.20	\$350.00	\$1,120.00
Service	05/08/2024	Draft Pleadings: Draft FAC for 24-cv-00002 Case,	2.60	\$350.00	\$910.00
Total					\$2,030.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
184	11/28/2024	\$2,030.00	\$0.00	\$2,030.00
Outstanding Balance				\$2,030.00
Total Amount Outstanding				\$2,030.00

Please make all amounts payable to: Michael Chen Law Offices

Please pay within 30 days.

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

In re

Case No. 1:24-BK-00002

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor.

DECLARATION OF MICHAEL CHEN

I, MICHAEL CHEN, hereby declare under penalty of perjury that:

1. I am a partner at Michael Chen Law Office (“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 Michael Chen Law Office, As Debtor’s Special Litigation Counsel, For The Period April 19, 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.

6. Attached to the Application as Exhibit “A” is an accurate statement of the services C&I rendered to the Debtor from April 19, 2024 To October 31, 2024.

Dated: Los Angeles, California November 6, 2024.

/s/ Michael Chen
Michael Chen

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[Attach additional sheets as needed.]

Print name if original signature