

CHOI & ITO
Attorneys at Law

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

MCDONALD LAW OFFICE

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

Attorneys for Debtor
and Debtor-in-Possession

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

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor and
Debtor-in-Possession.

Case No. 24-00002
Chapter 11

NOTICE OF HEARING ON (1) DEBTOR'S
APPLICATION TO EMPLOY KCL &
PARTNERS AS SPECIAL LITIGATION
COUNSEL TO THE DEBTOR; AND (2)
DEBTOR'S MOTION FOR POSTPETITION
LITIGATION FUNDING

Hearing:

DATE: January 31, 2025
TIME: 9:00 a.m. CHST
JUDGE: Hon. Robert J. Faris

[Related to ECF Nos. 347, 348]



**NOTICE OF HEARING ON (1) DEBTOR’S APPLICATION TO EMPLOY
KCL & PARTNERS AS SPECIAL LITIGATION COUNSEL TO THE DEBTOR;
AND (2) DEBTOR’S MOTION FOR POSTPETITION LITIGATION FUNDING**

TO CREDITORS AND OTHER PARTIES IN INTEREST:

On April 19, 2024, Imperial Pacific International (CNMI), LLC, debtor and debtor-in-possession herein (the “Debtor”), filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code in the United States District Court for the Northern Mariana Islands, Bankruptcy Division (the “Court”).

On January 17, 2025, the Debtor filed its *Application to Employ KCL & Partners* as special litigation counsel (the “Employment Application”) seeking to employ KCL & Partners (“KCL”) as special litigation counsel to represent the Debtor in a collection action against Chan, Chi Hung before the High Court of Hong Kong (the “HK Action”), pursuant to the terms set forth in the proposed engagement letter which is attached thereto. *See* ECF 347.

On January 17, 2025, the Debtor also filed its *Motion For Order Authorizing Debtor to Obtain Postpetition Litigation Funding* (the “Financing Motion”) seeks approval for up to HK \$1,420,000.00 (or approximately US \$183,000) from Kangyi Software Limited, pursuant to the terms set forth in the proposed Litigation Funding Agreement which is attached thereto. *See* ECF 348. The proposed loan is intended to be used as a post-petition retainer for KCL.

On January 17, 2025, the Court granted the Debtor’s *Motion to Shorten Time on [the Employment Application and Financing Motion]* as ECF 350.

1 The Employment Application and Financing Motion, including exhibits and
2 declarations in support thereof, may be obtained from the undersigned counsel or inspected
3 at the office of the Clerk of the Court during normal business hours.

4 **NOTICE IS HEREBY GIVEN that a hearing (“Hearing”) to consider the**
5 **Application shall be held on January 31, 2025 at 9:00 a.m. CHST**, in the Courtroom
6 of the Honorable Robert J. Faris located at United States District Court for the Northern
7 Mariana Islands, Bankruptcy Division, 1671 Gualo Rai Road, Gualo Rai, Saipan, MP
8 96950. Attendance by creditors and other parties in interest is welcome, but is not
9 required.
10

11 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Application
12 must be in the form required by L.R. 7.1 and must be filed prior to the hearing.
13

14 DATED: Honolulu, Hawaii January 16, 2025.

15 /s/ Allison A. Ito
16 CHUCK C. CHOI
17 ALLISON A. ITO
18 CHARLES MCDONALD II (F0494)

19 Attorneys for Debtor
20 and Debtor-in-Possession
21
22
23
24
25
26
27
28