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Attorneys for Judgment Creditor Joshua Gray

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

Case No. 1:24-bk-00002

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor and Debtor-in-Possession

**MOTION TO EXCUSE BRUCE BERLINE
AND ALLOW AARON HALEGUA AND
JOHN-PATRICK M. FRITZ TO APPEAR
WITHOUT LOCAL COUNSEL**

Hearing Date: January 31, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Robert J. Faris

A hearing in this matter is scheduled January 31, 2025 at 9:00 a.m. (ChST). Aaron Halegua, Bruce Berline and John-Patrick M. Fritz are co-counsel for Judgment Creditor Joshua Gray. Mr.



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1 Berline, who also serves as local counsel for Mr. Halebua and Mr. Fritz in this matter, will be off-
2 island from January 30, 2025 to February 3, 2025. Accordingly, Mr. Berline will be unable to attend
3 the January 30, 2025 hearing in person. Accordingly, Mr. Berline requests this Court to excuse him
4 from the January 31, 2025 hearing and to allow Mr. Halebua and Mr. Fritz to appear at such hearing
5 without local counsel. Mr. Halebua and Mr. Fritz are both intimately familiar with all the issues to be
6 addressed at the January 31, 2025 hearing, and will both appear via video-teleconference.

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8 Respectfully submitted this 27th day of January, 2025.

9
10 /s/
11 Aaron Halebua
12 John-Patrick M. Fritz
13 Bruce Berline
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15 Attorneys for Judgment Creditor
16 Joshua Gray
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