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**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-BK-00002
CHAPTER 11

NOTICE OF HEARING ON SAIPAN
STEVEDORE COMPANY, INC.'S
MOTION FOR RELIEF FROM
AUTOMATIC STAY

Hearing:

Date: March 18, 2025

Time: 8:30 AM

Judge: Robert J. Faris

[Related to ECF 365]

**NOTICE OF HEARING ON SAIPAN STEVEDORE COMPANY, INC.'S MOTION FOR
RELIEF FROM AUTOMATIC STAY**

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.

On February 11, 2025, Saipan Stevedore Company, Inc. moved, pursuant to 11 U.S.C. §§ 105 and § 362(d) and Rules 4001(a) and 9014 of the Rules of Bankruptcy Procedure ("F.R.B.P."), for



1 an Order granting Saipan Stevedore relief from Automatic Stay to allow Saipan Stevedore to seek
2 compensation for administrative expenses incurred for the post-Petition storage of Debtor's
3 twenty-eight containers and their respective contents currently stored and secured by Saipan
4 Stevedore (collectively, "Debtor's Containers"), or in the alternative, a declaratory judgment that
5 Debtor-in Possession Imperial Pacific International (CNMI) LLC ("Debtor") has abandoned
6 Debtor's Containers, or in the alternative, impose a warehouseman lien on Debtor's Containers in
7 favor of Saipan Stevedore or other adequate protection as an administrative creditor for Debtor
8 ("Motion for Relief From Automatic Stay"). *See* ECF 365.

10 The Motion for Relief From Automatic Stay, including its related declarations and exhibits in
11 support thereof, may be obtained from the undersigned counsel or inspected at the office of the
12 Clerk of the Court during normal business hours.

13 **NOTICE IS HEREBY GIVEN that a hearing ("Hearing") to consider the Motion for**
14 **Relief From Automatic Stay shall be held on March 18, 2025 at 8:30 a.m. CHST,** in the
15 Courtroom of the Honorable Robert J. Faris located at United States District Court for the Northern
16 Mariana Islands, Bankruptcy Division, 1671 Gualo Rai Road, Gualo Rai, Saipan, MP 96950.
17 Attendance by creditors and other parties in interest is welcome, but is not required.

19 **PLEASE TAKE FURTHER NOTICE** that any opposition to the Motion for Relief From
20 Automatic Stay must be in the form required by L.R. 7.1 and must be filed no later than fourteen
21 (14) days after the motion is served. The court may grant the relief without a hearing in the absence
22 of a timely filed opposition statement.

25 Dated this February 13, 2025.

SEMAN LAW OFFICES LLC

27 /s/
28 Vincent J. Seman

Attorney for Saipan Stevedore, Inc.

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