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13	Attorneys for Joshua Gray	
14	IN THE UNITED STATES DISTRICT COURT	
•	FOR THE NORTHERN MARIANA ISLANDS	
15	BANKRUPTCY DIVISION	
16		
17	In re	Case No. 1:24-bk-00002
	IMPERIAL PACIFIC INTERNATIONAL	SECURED CREDITOR JOSHUA GRAY'S
18	(CNMI), LLC,	JOINDER IN THE OPPOSITION TO THE
19	Debtor and	MOTION BY SAIPAN STEVEDORE
	Debtor and Debtor-in-Possession.	COMPANY, INC. FOR RELIEF FROM STAY FILED BY THE DEBTOR
20	20002 111 2 0000001011	STAT FILED BY THE DEDTOR
21		Hearing Date: March 18, 2025
-1		Hearing Time: 8:30 a.m. ChST Judge: Hon. Robert J. Faris
22		raage. Hon. Roott J. Lans
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Secured judgment creditor Joshua Gray ("Gray") hereby joins in the Opposition filed by the Debtor Imperial Pacific International (CNMI), LLC (ECF No. 377 ("Debtor Opposition")) to the Motion for Relief from Stay filed by the Saipan Stevedore Company, Inc. (ECF No. 365 (the "Motion"). As a preliminary matter, Gray shares in the objection that notice and service of the Motion, as well as the calculated deadline for an opposition to be filed, are improper. Gray also joins in the Debtor's other two arguments—namely, that the Movant has not demonstrated "cause" for relief from stay, and the Movant's request for alternative relief is also inappropriate.

Gray further notes that he is a secured creditor with a judgment lien on all of IPI's assets as well as a writ of execution on all of IPI's personal property, as set forth in detail and with the supporting documentation in his proof of claim. (See Claim 15). Gray therefore objects to the Court deeming these contents to be abandoned, particularly as the Movant has not demonstrated—and Gray objects to the contention—that the asset has no value to the estate. Critically, the Movant does not state with any certainty the contents of the containers or their market value. Gray also objects to any lien that is designed to take priority or be senior to Gray's own lien on this personal property. Finally, Gray notes that it is suspicious that the Movant was seemingly unpaid for so many years, but only now—almost one year into the bankruptcy—has the Movant sought any relief of this sort.

Gray also reserves the right to supplement this opposition either before the proper deadline for the submissions of oppositions to the Motion and/or at the hearing on the Motion.

Dated: March 4, 2025

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Respectfully submitted,

Aaron Halegua Bruce Berline J.P. Fritz

Attorneys for Judgment Creditor Gray