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Attorneys for Saipan Stevedore Company, Inc.

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

**IN RE IMPERIAL PACIFIC
INTERNATIONAL (CNMI) LLC,**

CASE NO. 24-BK-00002
CHAPTER 11

Debtor and Debtor in Possession,

Stipulation to Extend Remaining Briefing
and Hearing on Saipan Stevedore's Motion
for Relief From Automatic Stay

Saipan Stevedore Company, Inc. ("Saipan Stevedore"), the Official Committee of General Unsecured Creditors (the "Committee"), and the debtor and debtor in possession Imperial Pacific International (CNMI), LLC (the "Debtor") (together, the "Parties"), secured creditor Joshua Gray ("Gray"), through their respective counsel, hereby stipulate and agree:

1. The deadline for Saipan Stevedore to file a reply to any and all oppositions, responses, or joinders to the Motion shall be March 18, 2025, at 11:59 p.m. (ChST).

2. The hearing on the Motion shall be heard on March 25, 2025, at 9:00 a.m. (ChST), or such later and further date as is convenient with the Court's schedule if rescheduled by the Court.



1 Dated: March 11, 2025.

2 SIGNATURES:

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4 /s/
5 Vincent J. Seman
6 Attorney for the CNMI

7 /s/
8 Aaron Halegua
9 Bruce Berline
10 John-Patrick M. Fritz
11 Attorneys for Judgment Creditor Gray

12 /s/
13 Aram Ordubegian
14 Attorney for the Official Committee of
15 General Unsecured Creditors

16 /s/
17 Chuck Choi
18 Attorney for the Imperial Pacific International (CNMI), LLC
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