

Aram Ordubegian (admitted *pro hac vice*)
Christopher K.S. Wong (admitted *pro hac vice*)

ARENTFOX SCHIFF LLP
555 West Fifth Street, 48th Floor
Los Angeles, CA 90013-1065
Telephone: 213.629.7400
Facsimile: 213.629.7401
aram.ordubegian@afslaw.com
christopher.wong@afslaw.com

Keith Chambers II (F0528)
CHAMBERS LAW LLC
Marianas Business Plaza, Suite 409
PMB 919 Box 10000
Saipan, MP 96950
Telephone: 670.234.9005/06
Facsimile: 670.235.9007
keith.chambers@chamberslawcnmi.com

Attorneys for the Official Committee
of General Unsecured Creditors

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. 1:24-bk-00002

Chapter 11

**NOTICE OF MOTION AND EMERGENCY
MOTION BY OFFICIAL COMMITTEE OF
GENERAL UNSECURED CREDITORS TO
EXCEED PAGE LIMIT UNDER LOCAL
RULE 7.1(f)**

Judge: Hon. Robert J. Faris

**TO THE HONORABLE ROBERT J. FARIS, UNITED STATES BANKRUPTCY
JUDGE; AND ALL INTERESTED PARTIES:**

The Official Committee of General Unsecured Creditors (the “Committee”) of Imperial Pacific International (CNMI) LLC, the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 case (the “Case”) hereby moves this Court, pursuant to LBR 9013-1(a) and L.R. 7.1(f)(4), and based on the Declaration of Aram Ordubegian, dated March 19, 2025, for permission to file an omnibus reply in response to the *Opposition by Joshua Gray to the Joint*



1 *Motion of the Debtor and the Committee to Approve the Sale of the Debtor's Assets* (ECF No. 390,
2 "Gray Opposition") and *Opposition to Sale and Objection to Sale for Lack of Adequate Assurance*
3 *from Winning Bidder and Backup Bidder* (ECF No. 388) exceeding the limit of ten (10) pages up
4 to thirty (30) pages in length, exclusive of the table of contents and table of authorities. Permission
5 to exceed the page limit is necessary due to Gray Opposition being 27 pages long. Pursuant to
6 Local Rule 7.1(a)(3)(G), no hearing is required to decide this motion.

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9 Dated: March 19, 2025

ARENTFOX SCHIFF LLP

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11 By: /s/ Aram Ordubegian
12 Aram Ordubegian
13 Christopher K.S. Wong
14 Attorneys for the Official Committee of
15 Unsecured Creditors
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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2025, I caused the forgoing document to be filed with the Clerk of Court for the United States District Court for the Northern Mariana Islands, Bankruptcy Division, using the CM/ECF System. A true and correct copy of the said pleading has been served on all counsel of record via the Court's CM/ECF System.

Executed this 19th day of March, 2025.

/s/ Aram Ordubegian
ARAM ORDUBEGIAN