

Bruce Berline
LAW OFFICE OF BRUCE BERLINE, LLC
Security Title Building
Isa Drive, Capitol Hill
P.O. Box 5682
Saipan, MP 96950
Tel: (670) 233-3663
Fax: (670) 233-5262
Email: bruce@saipanlaw.com

Aaron Halegua
AARON HALEGUA, PLLC
524 Broadway, 11th Floor
New York, New York 10012
Tel: (646) 854-9061
Email: ah@aaronhalegua.com

John-Patrick M. Fritz
LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
2818 La Cienega Ave.
Los Angeles, CA 90034
Tel: (310) 229-3395
Email: jpf@lnbyg.com

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: June 13, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Robert J. Faris



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1 Joshua Gray (“Gray”) hereby submits this motion for attorney Bruce Berline to be excused
2 from the upcoming June 13, 2025 hearing in the above-captioned bankruptcy proceeding. Aaron
3 Halegua, Bruce Berline and John-Patrick M. Fritz are co-counsel for Judgment Creditor Joshua Gray.
4 Mr. Berline, who also serves as local counsel for Mr. Halegua and Mr. Fritz in this matter, will be off-
5 island on June 13, 2025 and will not be able to attend the June 13, 2025 hearing in person. Accordingly,
6 Mr. Berline, as local counsel for Mr. Halegua and Mr. Fritz, requests this Court to excuse his presence
7 at the June 13, 2025 hearing and allow Mr. Halegua and Mr. Fritz to appear at such hearing without
8 local counsel. Mr. Halegua and Mr. Fritz are both intimately familiar with all the issues to be addressed
9 at the June 13, 2025 hearing and will both appear at the hearing via video-conference, as they have
10 both been previously approved to appear via video-teleconference by this Court.
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12 Respectfully submitted this 6th day of June, 2025.
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15 /s/ Bruce Berline

16 Bruce Berline

17 Aaron Halegua

18 John-Patrick M. Fritz

19 Attorneys for Judgment Creditor

20 Joshua Gray
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