

Joey P. San Nicolas

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Attorney for Loi Lam Sit

**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

**MOTION TO EXCUSE JOEY P. SAN
NICOLAS AND ALLOW CHRISTOPHER
J. MUZZI TO APPEAR WITHOUT LOCAL
COUNSEL**

Date: July 24, 2025
Time: 9:00 a.m.
Judge: Hon. Robert Faris

COMES NOW, the undersigned local counsel, JOEY P. SAN NICOLAS, Esq., on behalf of his client, Loi Lam Sit, to request an order from the Court to allow counsel to be excused from the status conference set for July 24, 2025 at 9:00 a.m. before Judge Robert J. Faris and allow *Pro Hac Vice* counsel, Christopher J. Muzzi, Esq. to appear without local counsel.

It is respectfully submitted that good cause exists for the requested order on the grounds that undersigned counsel will be off-island to attend to a personal matter. Mr. Muzzi is intimately aware of the issues before this Court and will be present at the hearing via video teleconference.

Respectfully submitted this 19th day of July, 2025.



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/s/Joey P. San Nicolaoas
Joey P. San Nicolas
Attorney for Loi Lam Sit