

VINCENT J. SEMAN
Seman Law Offices, LLC
P.O. Box 10001 PMB 168
Saipan, MP 96950
Telephone: (670) 323-2115
E-mail: vjseman@semanlaw.com

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

Debtor and Debtor in Possession.

CASE NO. 24-BK-00002

STATEMENT OF NON-OPPOSITION

Hearing:

Date: July 24, 2025

Time: 9:00 AM

Judge: Robert J. Faris

Administrative Creditor Saipan Stevedore Company, Inc. (“Saipan Stevedore”), by and through its undersigned attorney, does not agree with, but will not oppose the additional continuance of the status conference and hearing on Saipan Stevedore’s Motion for Relief From Stay that was requested by Imperial Pacific International (CNMI), LLC, the debtor and debtor-in-possession herein (the “Debtor”), the Commonwealth of the Northern Mariana Islands (the “CNMI”), and the Official Committee of General Unsecured Creditors (the “Committee,” collectively with the Debtor and CNMI, the “Reporting Parties”) (ECF 454).

However, Saipan Stevedore strongly opposes any future requests for continuances. This Honorable Court has already accommodated a prior continuation request by the Debtor on this status conference and Saipan Stevedore’s Motion.

Further, Saipan Stevedore respectfully requests that the Court order Debtor and/or Team King, by the next hearing, to provide a detailed plan as to how and when it plans to remove Debtor’s 28 Containers from Saipan Stevedore’s storage facility. As of July 24, 2025, the current balance of storage fees will be \$272,580.00.



Dated this July 22, 2025.

Respectfully submitted,

/s/

Vincent J. Seman

Attorney for

Saipan Stevedore Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 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 Courts CM/ECF System.

Executed on July 22, 2025.

SEMAN LAW OFFICES LLC

Vincent J. Seman
Attorney for Saipan Stevedore, Inc.