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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORHERN MARIANA ISLANDS  
BANKRUPTCY DIVISION

In re

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,

Debtor.

Case No. 1:24-BK-00002

**SECOND INTERIM FEE  
APPLICATION OF CHOI & ITO,  
AS DEBTOR'S GENERAL  
BANKRUPTCY COUNSEL, FOR  
THE PERIOD NOVEMBER 1, 2024  
TO SEPTEMBER 20 2025;  
EXHIBIT A; DECLARATION OF  
CHUCK C. CHOI**

**Hearing Date and Time**

December 13, 2024 at 9:00 a.m.

(ChST)

December 12, 2024 at 1:00 p.m. (HST)

Judge: Hon. Robert J. Faris

**SECOND INTERIM FEE APPLICATION OF CHOI & ITO, AS DEBTOR'S  
GENERAL BANKRUPTCY COUNSEL,  
FOR THE PERIOD NOVEMBER 1, 2024 TO SEPTEMBER 30, 2025**



1 Choi & Ito (the “Applicant”), counsel Imperial Pacific International, the debtor  
2 and debtor-in-possession (the “Debtor”), in support of its Second interim fee  
3 application for the period November 1, 2024, to September 30, 2025, respectfully  
4 represents as follows:  
5

6 **I. JURISDICTION AND VENUE**

7 This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and  
8 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper  
9 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.  
10

11 This Application is brought pursuant to 11 U.S.C. § 328 and Rule 2002(a)(6) of  
12 the Rules of Bankruptcy Procedure.

13 **II. BACKGROUND**

14 On April 19, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for  
15 relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”)  
16 in the United States District Court for the District of the Northern Mariana Islands,  
17 bankruptcy division (the “Court”).  
18

19 The Debtor is a limited liability company organized under the laws of the  
20 Commonwealth of the Northern Mariana Islands (the “Commonwealth”). Its sole  
21 member is Best Sunshine International Ltd., a British Virgin Islands corporation. Best  
22 Sunshine is owned by Imperial Pacific International Holding Ltd.  
23

24 On or about August 12, 2014, the Debtor, Best Sunshine and the Commonwealth  
25 Lottery Commission entered into an exclusive casino license agreement (the “Casino  
26 License”) for the island of Saipan which required, among other things, the payment of  
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1 \$15 million in annual Casino License fees. The Debtor made \$90 million in Casino  
2 License fee payments from 2014 to 2019, before the COVID-19 Pandemic.

3 Notwithstanding the fact that the Debtor was obligated to pay a \$15 million per  
4 annum exclusive Casino License fee to the Commonwealth Treasurer, on December 4,  
5 2015, the Commonwealth enacted Public Law 19-24 which imposed an annual “Casino  
6 Regulatory Fee” on the Debtor of \$3 million due on or before October 1, 2015. The  
7 Debtor made \$15 million in total Casino Regulatory Fee payments from 2015 to 2019.

8 The Debtor successfully operated a casino for approximately four years, until the  
9 COVID-19 Pandemic forced its closure in March, 2020. Hotel construction ceased in  
10 2021. Since then, the Hotel has been open to the elements and is currently in poor  
11 condition. It is estimated that the cost of completing the construction of the Hotel will  
12 be between \$100 million to \$150 million.

13 As of the Petition Date, the Debtor’s major real estate assets consisted of (1) its  
14 casino, which is housed in its hotel building (the “Hotel”), which in turn is situated  
15 primarily on approximately 19,204 square meters of land leased (the “Leasehold  
16 Property”) from the Department of Public Land (“DPL”) pursuant to Lease Agreement  
17 No. LA-15-002S; and (2) the Debtor’s ownership interest in Imperial Pacific Properties,  
18 LLC, which holds a leasehold interest in eight lots adjacent to the Leasehold Property  
19 (the “IPP Interest”, together the “Leased Property”).

### 20 **III. Status of Bankruptcy**

21 On April 23, 2024, the Debtor filed a joint application to employ the Applicant  
22 and McDonald Law Office (“MLO”) as general bankruptcy co-counsel, effective as of  
23 the Petition Date. *See* dkt. # 10.

On April 23, 2024, the Debtor filed certain “first day” motions including its:

1. *Application to Employ Choi & Ito, Attorneys at Law and McDonald Law Office as Co-Counsel for the Debtor* (the “Joint Application”) (ECF 10);
2. *Application to Employ Michael Chen Law Offices as special litigation counsel for the Debtor* (the “Chen Application”) (ECF 13);
3. *Motion for Interim Fee Procedures* (the “Fee Procedures Motion”) (ECF 9); and
4. *Motion For Order Authorizing Debtor To Pay Pre-Petition Wages And Other Employment-Related Costs And Expenses* (the “Wage Motion”) (ECF 11).

On June 28, 2024, the Court entered final orders approving (1) the Joint Application, effective as of the Petition Date; (2) the Chen Application, effective as of the Petition Date; and (3) the Fee Procedures Motion. *See* ECF 146, 149, 151.

On April 23, 2024, the Debtor filed its *Motion for Order Authorizing Debtor to Obtain Postpetition Secured Indebtedness* (“DIP Financing Motion”) (ECF 12, 15). The UST (ECF 19), Gray (ECF 30), and Thomson Creditors (ECF 41) filed statements in response to the DIP Financing Motion. At a hearing held on April 26, 2024, the Court continued the hearing on the DIP Financing Motion. On May 10, 2024, the Debtor submitted a redlined loan term sheet and Debtor in Possession Loan Agreement. *See* ECF 47.

On May 14, 2024, the UST appointed a Committee of Unsecured Creditors (the “Committee”) consisting of Hughes Hubbard & Reed LLP, DFK Limited, and Corrado Modica.

On June 15, 2024, the Committee filed separate applications to employ ARENTFOX SCHIFF LLP as general bankruptcy counsel and Chambers Law LLC as local counsel for the Committee, respectively. *See* ECF 115 and 133. On July 8, 2024,

1 the Court approved the employment of Arent Fox as general bankruptcy counsel and  
2 Chambers Law as local counsel for the Committee, respectively. See ECF 162, 163. On  
3 October 19, 2024, Judge Manglona issued her *Memorandum of Decision Denying Bid*  
4 *Procedures Motion, Granting Intrepid Application, and Staying Keen-Summit*  
5 *Application*, and issued an Order of Self-Recusal in the main Chapter 11 case. See ECF  
6 281, 282.

8 On July 18, 2025, the Court entered a *Final Order Authorizing Debtor to Obtain*  
9 *Postpetition Indebtedness* authorizing Loi Lam Sit to loan up to \$1.4 million on an  
10 administrative priority basis (the “DIP Order”) to the Debtor to fund the chapter 11  
11 case. See ECF 173.

13 On October 19, 2024, the Judicial Council of the Ninth Circuit entered an *Order*  
14 *re Temporary Transfer*, temporarily transferring Judge Faris as U.S. Bankruptcy Judge  
15 to the District of the Northern Mariana Islands, in addition to his duties in his resident  
16 District of Hawaii. See ECF 283.

18 On November 7, 2024, the Applicant, Michael Chen Law Office, and ArentFox  
19 Schiff, LLP filed their first interim fee applications. See ECF 294-298. On November  
20 8, 2024, Chambers Law (local counsel to the Committee) filed its First Interim Fee  
21 Application. See ECF 302.

23 On November 21, 2024, the UST filed Statements of Consensual Reduction in  
24 Fees relating to the Applicant’s 1<sup>st</sup> Interim Fee Application and the ArentFox 1<sup>st</sup> Interim  
25 Fee Application. See ECF 310, 311.

26 On December 13, 2024, the Debtor filed its Status Conference Report. See ECF  
27 324.  
28

1 On December 13, 2024, the Court held a hearing on the various 1<sup>st</sup> Interim Fee  
2 Applications and granted the applications as adjusted pursuant to the Statements of  
3 Consensual Reduction. *See* ECF 325. On December 17 and 18, 2024, the Court entered  
4 orders approving the first interim fee applications of ArentFox and Chambers Law  
5 Office, respectively. *See* ECF 331, 332. On January 2, 2025, the Court entered orders  
6 approving the first interim fee applications of the Applicant and Michael Chen Law  
7 Office, respectively. *See* ECF 336, 337.

9 On December 13, 2024, Creditor Joshua Gray (“Gray”) and USA Fanter filed a  
10 motion to distribute proceeds from auction of IPI’s Vehicles (the “Motion to Distribute  
11 Vehicle Proceeds”). *See* ECF 327.

13 On January 4, 2025, the Committee filed a *Stipulation of Debtor and Official*  
14 *Committee of General Unsecured Creditors (A) to Establish Bidding Procedures for the*  
15 *Sale of the Assets of the Debtor, (B) to Designate a Stalking Horse Bidder, (C) to*  
16 *Schedule an Auction and a Sale Hearing and (D) to Establish Assumption and*  
17 *Assignment Procedures* (the “Bid Procedures Stipulation”). *See* ECF 338.

19 On January 8, 2025, the Court entered an order approving the Bid Procedures  
20 Stipulation. *See* ECF 340.

21 On January 8, 2025, the Court also entered an Order approving the Motion to  
22 Distribute Vehicle Proceeds. *See* ECF 341.

24 On January 11, 2025, the Debtor filed a *Notice of Sale, Bidding Procedures,*  
25 *Auction, Sale Hearing and Other Deadlines Related Thereto, and a Notice of Cure*  
26 *Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired*  
27 *Leases in Connection with Sale of Substantially All Assets.* *See* ECF 343, 344.  
28

1 On January 17, 2025, the Debtor filed an *Application to Employ KCL & Partners*  
2 *as Special Litigation Counsel* (the “KCL Employment Application”) to represent the  
3 Debtor in pending litigation before the High Court of Hong Kong, and a *Motion For*  
4 *Order Authorizing Debtor To Obtain Postpetition Litigation Funding* (“Motion for  
5 Litigation Funding”) to borrow HK\$1,420,000 to fund the pending litigation in Hong  
6 KONG. *See* ECF 347, 348.

8 On January 30, 2025, the Debtor filed a *Notice of Designation of Stalking Horse*  
9 *Bidder*, identifying Loi Lam Sit as the Stalking Horse Bidder, with a bid of \$12.5  
10 million to purchase the Debtor’s real property interest, tangible personal property,  
11 inventory, accounts receivables, as well as certain other assets (plus an option to  
12 purchase the Casino License). *See* ECF 359. Mr. Sit, who made the DIP Loan, was the  
13 only bidder.

15 On January 31, 2025, the Court held a hearing on the KCL Employment  
16 Application and Motion for Litigation Funding. *See* ECF 362.

18 On February 11, 2025, Saipan Stevedore Company, Inc. (“Saipan Stevedore”)  
19 filed a motion for relief from automatic stay (the “Stevedore Relief from Stay  
20 Motion”). *See* ECF 365.

21 On February 14, 2025, the Debtor and Committee filed a *Joint Motion for Order*  
22 *(I) Approving the Sale of Substantially all of the Debtor's Assets Free and Clear of All*  
23 *Liens, Claims, and Encumbrances Pursuant to 11 U.S.C. § 363, Subject to Overbids;*  
24 *and (II) Authorizing the Assumption and Assignment of Certain Executory Contracts*  
25 *and Cure Amounts Associated Therewith* (the “Joint Sale Motion”). *See* ECF 367.  
26  
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28

1 On February 26, 2025, Intrepid Investment Bankers LLC (“Intrepid”) conducted  
2 an auction for the sale of the Debtor’s assets. Team King Investment (CNMI) LLC  
3 “Team King”), made the minimum overbid of \$12,950,000. Mr. Sit declined to bid  
4 further and Intrepid announced Team King as the high bidder. As a result, Mr. Sit is  
5 entitled to assert a \$250,000 breakup fee.  
6

7 On February 28, 2025, the Committee filed a *Notice of Successful Bidder and*  
8 *Back-Up Bidder*, identifying Team King as the successful bidder for the Debtor’s  
9 assets. See ECF 374.  
10

11 On March 1, 2025, Gray filed a Stipulation to Extend Briefing Deadlines on the  
12 Joint Sale Motion by and among Gray, the Debtor, the Committee and the  
13 Commonwealth. See ECF 375.

14 On March 4, 2025, the Debtor filed an Opposition to the Stevedore Relief from  
15 Stay Motion. See ECF 377.  
16

17 On March 11, 2025, Saipan Stevedore filed a Stipulation to Extend Remaining  
18 Briefing and Hearing on the Stevedore Relief from Stay Motion. See ECF 383.

19 On March 11, 2025, CNMI, Gray filed oppositions to the Joint Sale Motion. See  
20 ECF 388, 390.  
21

22 On March 18, 2025, the Court entered an order granting Stipulation to Adjourn  
23 Hearing on the Joint Sale Motion, and reset the hearing on the Joint Sale Motion to  
24 April 15, 2025. See 402.

25 On March 19, 2025, Saipan Stevedore filed a Stipulation to Extend Remaining  
26 Briefing and Hearing on the Stevedore Relief from Stay Motion. See ECF 403.  
27  
28



1 On March 20, 2025, Loi Lam Sit filed a response to objections to his breakup fee.  
2 *See* ECF 409.

3 On March 21, 2025, the Debtor and the Committee filed replies to oppositions to  
4 the Joint Sale Motion. *See* 410, 411.

5 On April 1, 2025, Committee submitted a further stipulation by and among the  
6 Committee, the Debtor, Gray, the Commonwealth and Team King to continue the  
7 hearing on the Joint Sale Motion to April 29, 2025. *See* ECF 412. On April 2, 2025,  
8 the Court entered an order granting the stipulation to further adjourn the hearing on the  
9 Joint Sale Motion, and rescheduled the hearing on the Joint Sale Motion to April 29,  
10 2025. *See* ECF 415.

11 On April 2, 2025, Saipan Stevedore filed a Third Stipulation to Extend Remaining  
12 Briefing and Hearing on the Stevedore Relief from Stay Motion. *See* ECF 417. On  
13 April 3, 2025, the Court entered an order granting the Third Stipulation. *See* ECF 418.

14 On April 15 and 18, Creditor Gray filed stipulations to extend briefing deadlines  
15 on the Joint Sale Motion, which were both granted. *See* ECF 423-426.

16 On April 24, 2025, the Debtor submitted the asset purchase agreement with Team  
17 King. *See* ECF 427.

18 On April 24, 2025, the Committee submitted a *Stipulation Resolving Section 363*  
19 *Objections to Joint Sale Motion*. On April 25, 2025, Team King submitted a  
20 *Declaration of Hiroshi Kaneko in Support of Team King Investment (CNMI), LLC in*  
21 *Support of Good Faith Purchaser Finding Pursuant to Section 363(m) of the*  
22 *Bankruptcy Code*. *See* ECF 429.

1 At a hearing held on April 29, 2025, the Court approved the Joint Sale Motion and  
2 set a status conference for June 13, 2025. *See* ECF 432.

3 On May 1, 2025, the Court entered an order granting the Joint Sale Motion. *See*  
4 ECF 443.

5  
6 On June 12, 2025, the Debtor submitted a pre-status conference report, reporting  
7 that Team King and the Commonwealth were at an impasse regarding the assignment  
8 of the ground lease, and thus causing a delay in the closing date. *See* ECF 441.

9 On June 13, 2025, the Court held a status conference on the sale and a further  
10 hearing on the Stevedore Relief from Stay Motion. At the hearing, the Debtor noted  
11 that the delay in closing has resulted in a lack of cash to pay for the renewal of the  
12 insurance policy and to pay the security guards protecting the debtor's property. *See*  
13 442.

14  
15 On June 13, 2025, the Court entered an *Order to Show Cause Why Case Should*  
16 *Not be Dismissed or Converted* ("OSC") due to the Debtor's inability to renew its  
17 liability insurance and pay security guards due to lack of cash. *See* ECF 443.

18  
19 On June 18, 2025, the Debtor filed a Submission of Proof of Insurance in  
20 Response to Order to Show Cause. *See* ECF 446.

21 On June 24, 2025, the UST, Committee, and the Debtor each filed responses to  
22 the OSC. *See* ECF 447-449.

23  
24 On June 27, 2025, the Court further continued the status conference on the Joint  
25 Sale Motion and the Stevedore Relief from Stay Motion. *See* ECF 452.

26 On July 17, 2025, the Debtor filed a Joint Pre-Status Conference Report. *See*  
27 ECF 454.  
28

1 On July 24, 2025, the Debtor filed a Supplement to Joint Pre-Status Conference  
2 Report. *See* ECF 458.

3 At a hearing on July 24, 2025, the Court continued the status conference on the  
4 Joint Sale Motion and the Stevedore Relief from Stay Motion. *See* ECF 460.

5 On July 25, 2025, the Court filed a Renewed Order to Show Cause Why Case  
6 Should Not be Dismissed (“Renewed OSC”). *See* ECF 461.

7 On August 11, 2025, the Debtor filed a Supplement to its Pre-Status Conference  
8 Report, attaching a letter from the Commonwealth to Team King regarding the  
9 proposed lease assignment. *See* ECF 463.

10 On August 15, 2025, the Committee filed a Statement regarding the Debtor’s Pre-  
11 Status Conference Report. *See* ECF 468.

12 On August 15, 2025, the Debtor filed a response to the Renewed OSC. *See* ECF  
13 469.

14 On August 21, 2025, the Court held a further status conference, and converted the  
15 Saipan Stevedore Relief from Stay Motion to a Motion for Administrative Claim. *See*  
16 ECF 472.

17 On August 27, 2025, the Court entered an *Order Setting Deadlines to File*  
18 *Disclosure Statement and Plan of Reorganization*, and set October 31, 2025 as the  
19 deadline for the Debtor to file a plan and disclosure statement. *See* ECF 474.

20 On September 2, 2025, the Saipan Stevedore filed an *Updated Declaration of Lee*  
21 *Cabrera in Support of Motion for Administrative Expenses* claim in the amount of  
22 \$288,510 (the “Stevedore Administrative Expense Claim”). *See* ECF 475.

1 On September 13, 2025, the Debtor filed a stipulation by and among the Debtor,  
2 the Committee and Saipan Stevedore, extending the deadline for the Debtor and  
3 Committee to file a response to the Stevedore Administrative Expense Claim. *See* ECF  
4 476.  
5

6 On September 20, 2025, the Debtor filed a stipulation by and among the Debtor,  
7 the Committee and Saipan Stevedore, allowing Saipan Stevedore an administrative  
8 expense claim in the amount of \$222,430.00.  
9

#### 10 **IV. SERVICES PROVIDED DURING PERIOD**

11 The legal services rendered by Applicant for the period November 1, 2024 through  
12 September 30, 2025 (“Application Period”), are itemized in the invoices which are  
13 attached as Exhibit “A” hereto and incorporated herein by reference.

14 Applicant requests approval for fees in the amount of \$179,261.70 for the  
15 Application Period (including \$8,066.70 in Hawaii general excise tax) computed as set  
16 forth and explained in Exhibit A. Applicant also incurred \$822.45 in actual and  
17 necessary expenses as set forth and explained in Exhibit A.  
18

19 As of the date of this Application, Applicant has received \$220,746.20 on account  
20 of its First Interim Fee Application. Applicant has \$45,604.34 in its client trust account.

21 During the Application Period, Applicant assisted the Debtor by providing services  
22 in the following categories:  
23

- 24 a. Administration (\$8,921.46). Services in this category included:
- 25 • Advice re operating in chapter 11 and administrative matters.
  - 26 • Advised Debtor regarding authorized transactions.
  - 27
  - 28

- Assisted Debtor with preparation of monthly operating reports.
- Assisted in opening new DIP accounts.
- Assisted Debtor with issues procuring insurance.
- Prepared stipulations regarding deadline for administrative expense claim.
- Assisted Debtor with periodic reports.

b. First Day Motions and DIP Financing (\$3,958.11). Services in this category included:

- Analyzed DIP funding
- Prepared Motion for Litigation Funding.
- Attended hearings on the Litigation Funding Motion, and prepared order approving same.

c. Employment (\$19,225.12). Services in this category included:

- Prepared first interim fee application for Applicant, and supplemental declaration in support of application.
- Prepared first interim fee application for Special Litigation Counsel Michael Chen Law Office.
- Attended hearings on first interim fee application, and prepared orders re same.
- Negotiated terms of engagement of HK attorneys.
- Prepared KCL Employment Application, and order approving same; provided additional information to UST re same.
- Reviewed interim fee application of KCC and Committee Counsel.
- Reviewed Intrepid invoices.
- Reviewed KCC invoices.

1 d. Creditors and Claims (\$19,193.71) Services in this category  
2 included:

- 3 • Respond to various inquiries from creditors regarding case  
4 status and their respective claims.
- 5 • Reviewed various POCs.
- 6 • Advised the Debtor regarding various creditors' liens rights
- 7 • Communicated with Committee generally regarding case.
- 8 • Analyzed Saipan Stevedore Relief from Stay Motion, and  
9 prepared Debtor's position statement re same. Analyzed  
10 Stevedore administrative expense claim; negotiated allowed  
11 Administrative Expense claim for Saipan Stevedore;  
12 prepared stipulation re same.
- 13 • Analyzed motion to excuse compliance filed by Clear  
14 Management (Receiver). Prepared opposition to same and  
15 read Clear Management's reply. Attended hearing on  
16 Clear's motion to excuse compliance.
- 17 • Analyzed Gray's Motion to Distribute Vehicle Proceeds.
- 18 • Communicated with Gray' counsel regarding litigation and  
19 dismissal of appeal.
- 20 • Communicated with IRS re priority claim.
- 21 • Communicated with Sit's counsel re administrative expense  
22 claim.
- 23 • Researched tax liens.

24 e. Casino License Matters (\$879.58) Services in this category  
25 included:

- 26 • Communicated with client regarding casino license issues.
- 27 • Communicated with Team King counsel re license issues.

- Communicated with counsel for Gray and Committee status of casino license negotiations.

f. Asset Disposition, Plan and Disclosure Statement (\$125,167.49)

Services in this category included:

- Communicated with client regarding sale procedures and bids and auction, post-closing items.
- Communicated with Committee counsel regarding status of sale and marketing of the property.
- Provided due diligence information as requested by Intrepid and monitored marketing.
- Attended status conferences.
- Prepared Bid Procedures Stipulation; communicated with client re same; negotiated same with committee counsel; prepared order re same.
- Analyzed title reports for Debtor's lease with DPLand IPP real property leases.
- Drafted sale term sheet with Sit; negotiated with Sit re same.
- Researched DPL lease approval requirements.
- Reviewed and exchanged version of purchase agreement with Committee.
- Communicated with Committee Counsel regarding sale and marketing matters.
- Communicated with Sit's counsel re sale issues and re Stevedores.
- Reviewed bid and redlined purchase agreement from Team King.
- Communications with interested parties and researched potential bidder.
- Communications re auction logistics. Attended auction.

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- Communicated with Gray’s counsel re bidding and relief from stay issues
- Communicated with Committee, Commonwealth and Team King counsel re license issues and other sale related issues.
- Prepared Joint Sale Motion. Reviewed Commonwealth and Gray’s opposition to Joint Sale Motion; communicated with client re same; communicated with Committee counsel re same. Prepared reply in support of Joint Sale Motion.
- Coordinated closing matters. Prepared escrow instructions. Prepared closing documents. Communicated with client re status of closing and funding.
- Prepared pre-status conference reports regarding sale status. Attend several status conferences on sale status and closing issues.
- Advised client re insurance and closing issues. Communicated with UST re insurance matters.
- Prepared responses to OSC and Renewed OSC.
- Communicated with Team King counsel re closing issues and DPL issues.
- Worked on various post-closing issues.

g. Litigation (\$2,356.02) Services in this category included:

- Advised client regarding various litigation matters
- Analyzed pending litigation in Hong Kong.
- Researched arbitration clause and case law re same.
- Communicated with Hong Kong counsel re Hong Kong case status.
- Communications concerning stipulation and dismissal of appeals.



1 **V. FEES REQUESTED**

2 Applicant requests approval for fees in the amount of \$179,261.70 for the  
3 Application Period, including \$8,066.70 in Hawaii general excise tax computed as set  
4 forth and explained in Exhibit “A.” Applicant also incurred \$822.45 in actual and  
5 necessary expenses as set forth and explained in Exhibit “A.”  
6

7 Bankruptcy Code section 331 authorizes this Court to allow interim compensation  
8 to professionals employed “not more than once every 120 days after an order for relief  
9 under this title . . . .” 11 U.S.C. § 331.  
10

11 Bankruptcy Code section 330(a)(1) authorizes the Court to award reasonable  
12 compensation and reimbursement for actual, necessary expenses to a professional. 11  
13 U.S.C. § 330(a)(1). Bankruptcy Code section 330(a)(3) provides:

14 (3) In determining the amount of reasonable compensation to be awarded  
15 . . . the court shall consider the nature, the extent, and the value of such  
16 services, taking into account all relevant factors, including –

17 (A) the time spent on such services;

18 (B) the rates charged for such services;

19 (C) whether the services were necessary to the administration of, or  
20 beneficial at the time at which the service was rendered toward the  
21 completion of, a case under this title;

22 (D) whether the services were performed within a reasonable amount  
23 of time commensurate with the complexity, importance, and nature of  
24 the problem, issue, or task addressed;

25 (E) with respect to a professional person, whether the person is board  
26 certified or otherwise has demonstrated skill and experience in the  
27 bankruptcy field; and

28 (F) whether the compensation is reasonable based on the customary  
compensation charged by comparably skilled practitioners in cases  
other than cases under this title.

1 11 U.S.C. § 330(a)(3).

2 As detailed in Exhibit “A” hereto and the LBR 2016-1b Summary Sheet filed  
3 herewith, the services provided by Applicant during the Application Period were  
4 provided at a blended hourly rate of approximately \$400.74 by the Applicant’s attorneys.  
5 Applicant submits that the hourly rates for services performed by its attorneys, in this  
6 case, are reasonable. These rates are the same as are charged to non-bankruptcy clients  
7 by Applicant and are consistent with the rates approved by other Bankruptcy Courts in  
8 cases that were pending during the periods for which compensation is requested.  
9

10 No agreement or understanding exists between the Applicant and any other person  
11 regarding a division of any compensation to be received for services performed in  
12 connection with this case.  
13

14 WHEREFORE, Applicant prays that the Court enter an order: (a) allowing  
15 Applicant, interim fees in the amount of \$179,261.70 (including \$8,066.70 in Hawaii  
16 general excise tax), and reimbursement of expenses in the amount of \$822.45, for  
17 services provided during the Application Period, or such other amounts as the Court shall  
18 deem fair and reasonable; and (b) granting such other relief as the Court deems fair and  
19 just.  
20

21 DATED: Honolulu, Hawaii, October 30, 2025.  
22

23 /s/ Allison A. Ito  
24 CHUCK C. CHOI  
25 ALLISON A. ITO  
26 Attorney for Debtor and  
27 Debtor-in-Possession  
28

# **EXHIBIT A**

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

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Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-00

INVOICE NO: 25316

RESPONSIBLE ATTY: CCC

RE: Chapter 11 Costs

HOURS

SUB TOTAL

0.00 \$0.00

### FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
11-30-24 Photocopies			32.80
12-05-24 Lexis Nexis Research			128.04
12-12-24 Pacer Imperial Pacific			15.00
12-31-24 Photocopies			2.40
01-31-25 Photocopies			41.00
02-27-25 Jan 2025 - Lexis Nexis			155.14
02-28-25 Photocopies			4.80
03-24-25 U.S. District Court			199.00
Pacer			2.50
03-31-25 Photocopies			11.00
04-03-25 March 2025 - Lexis Nexis			117.45
04-30-25 Photocopies			7.20
05-31-25 Photocopies			7.20
06-30-25 Photocopies			7.20
07-03-25 Lexis Nexis			87.92
07-31-25 Photocopies			3.40
09-24-25 Pacer			0.40
TOTAL EXPENSES			<u>\$822.45</u>

**TOTAL CURRENT WORK**

**\$822.45**

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

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Fax: (808) 566-6900  
E-mail: [hibklaw@hibklaw.com](mailto:hibklaw@hibklaw.com)

Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-01

INVOICE NO: 25321

RESPONSIBLE ATTY: CCC

RE:	Administrative	HOURS
11-01-24		
CCC	Review e-mail and banking info.	0.10
11-03-24		
CCC	Review filings re appearance and prepare e-mail to counsel for Sit.	0.10
11-12-24		
AAI	Review check registers.	0.10
11-15-24		
AAI	Read e-mail from Flores regarding Operating report and draft response.	0.30
11-16-24		
AAI	Work on amended operating report.	0.70
11-18-24		
CCC	Review MOR.	0.20
AAI	Work on operating report.	1.00
11-19-24		
AAI	E-mails to and from Mafnas regarding October financial reports.	0.10
11-25-24		
AAI	Review draft financial reports and e-mail client re same (.20); work on operating report (.90).	1.10
12-05-24		
AAI	Finalize operating report for electronic submission.	0.20

**CHOI & ITO**Page: 2  
09 -30-25Imperial Pacific International (CNMI) LLC  
AdministrativeACCOUNT NO: 1815-01  
INVOICE NO: 25321

12-06-24

AAI Read e-mail from CCC to client regarding status of DIP financing; 0.20  
read e-mail from CCC regarding status of marketing the property;  
read e-mail from Wong regarding upcoming status conference.

12-13-24

CCC Respond to inquiry from HK receiver. 0.20

AAI Read inquiry from HK attorney regarding IPI and e-mail response 0.10  
from CCC re same.

12-18-24

AAI Read and respond to client e-mail regarding banking issues. 0.10

12-20-24

CCC E-mails with client re budgeting and call re expense. 0.10

AAI Read e-mail from client regarding pending receivables and confer 0.10  
with CCC re same.

12-26-24

AAI Read e-mail string regarding 941 returns. 0.10

12-30-24

AAI Work on operating report. 0.40

01-04-25

AAI Work on operating report. 0.90

01-06-25

AAI Read e-mail from client and finalize operating report for electronic 0.30  
submission.

01-15-25

AAI Read and respond to e-mail from Flores (.50); read UST's 2.10  
comments to litigation funding and employment application (.10);  
further revisions to litigation financing motion and draft Kangyi  
declaration in support of motion (.80); video conference with CCC,  
Mox and KCL regarding employment application (.50); e-mail  
client regarding periodic report (.20).

**CHOI & ITO**Page: 3  
09 -30-25Imperial Pacific International (CNMI) LLC  
AdministrativeACCOUNT NO: 1815-01  
INVOICE NO: 25321

01-24-25		
AAI	Review and comment on draft periodic report and ask client for additional information (.30); e-mail client regarding December financials (.10).	0.40
01-27-25		
AAI	Review documents from client and prepare operating report.	0.20
01-29-25		
CCC	Call from FBI re files and e-mail to client.	0.40
AAI	E-mail client regarding periodic report (.10); read e-mails regarding return of files (.10); read e-mail from CCC to client regarding KCL; further work on operating report (.60).	0.80
01-30-25		
AAI	Work on operating report (.30); prepare for and attend status conference and application to employ KCL and obtaining litigation financing (.80); further video conference with CCC and client (.70).	1.80
02-01-25		
AAI	Read inquiry from Shepherd.	0.10
02-04-25		
AAI	Work on order regarding financing motion.	0.60
02-05-25		
AAI	Review draft periodic report.	0.20
03-04-25		
AAI	Review operating report materials from client and work on operating report.	0.20
03-31-25		
AAI	Review e-mails from UST and Committee regarding orders to employ special litigation counsel and litigation funding, and finalize same for electronic submission.	0.40
04-01-25		
AAI	E-mails with client regarding operating reports and periodic report.	0.30
04-04-25		
CCC	Review MOR.	0.20

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Administrative

Page: 4  
09 -30-25

ACCOUNT NO: 1815-01  
INVOICE NO: 25321

04-07-25	AAI	Review financial reports from client and further revise operating report.	0.40
04-08-25	AAI	Read e-mail from Verita regarding invoices.	0.10
04-09-25	AAI	Follow up with client regarding January and February operating reports.	0.10
04-11-25	CCC	Review MOR.	0.10
04-15-25	AAI	Read Verita invoice; e-mail client regarding operating report.	0.10
	AAI	Read court minute entries regarding updated hearing dates.	0.10
04-16-25	AAI	Read e-mails from client regarding operating report (.10); work on operating report (.60).	0.70
04-18-25	AAI	Read e-mail among bookkeeper and client regarding operating report.	0.10
04-24-25	AAI	Read and respond to e-mail from bookkeeper regarding operating report.	0.10
04-29-25	AAI	Review additional materials from bookkeeper, and further revisions to operating report.	0.60
05-07-25	AAI	Read e-mails from client regarding cash position and payables.	0.10
05-14-25	AAI	Read e-mail from client regarding April financials.	0.10
05-15-25	AAI	Work on operating report.	0.20



**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Administrative

Page: 5  
09 -30-25

ACCOUNT NO: 1815-01  
INVOICE NO: 25321

05-22-25	AAI	Read e-mail from client regarding payroll and staffing issues.	0.10
05-27-25	AAI	Work on operating report.	1.10
06-10-25	AAI	E-mail client re May operating report (.10); prepare pre-status conference report (.30).	0.40
06-11-25	AAI	Read e-mail from client regarding liquidity and employees (.10); conference with CCC re case status and operation matters (.10).	0.20
06-12-25	AAI	Preliminary review of financial reports from client (.10); read e-mail from UST re insurance renewal (.10); attend status conference (.60); read e-mails from client regarding insurance (.10); telephone call with insurance agency and send update e-mail to client (.10).	1.00
06-13-25	AAI	Work on operating reports and e-mail client re same.	0.80
06-14-25	CCC	Review April MOR and attachments and respond to client e-mail.	0.40
06-16-25	CCC	Review e-mails from client and Yanza re insurance and closing issues and respond (.30); call with Muzzi re status of closing (.10); call with buyer and seller re same and follow up with client and further e-mails with buyer counsel (1.20).	1.60
07-29-25	AAI	Work on operating report.	0.80
07-30-25	AAI	Further work on operating report and e-mail client re same.	0.30
08-08-25	AAI	Follow up with client re operating report and finalize same for electronic submission.	0.30
08-19-25	AAI	E-mails with client re operating report.	0.10

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Administrative

Page: 6  
09 -30-25

ACCOUNT NO: 1815-01  
INVOICE NO: 25321

08-25-25

CCC Review and respond to e-mail re bank accounts. 0.10

AAI Read e-mails from client regarding FHB account closure. 0.10

08-26-25

AAI Read numerous e-mails from client re FHB account closure and MEL. 0.10

09-12-25

AAI Draft stipulation to extend deadline re administrative expense claim. 2.20

09-26-25

CCC E-mail to client re tax returns. 0.10

SUB TOTAL

26.60 \$8,520.00

FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	3.60	\$450.00	\$1,620.00
Allison A. Ito	23.00	\$300.00	\$6,900.00

STATE TAX 401.46

TOTAL FEES \$8,921.46

TOTAL EXPENSES \$0.00

**TOTAL CURRENT WORK**

**\$8,921.46**

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
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Honolulu, Hawaii 96813

## CHOI & ITO

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Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-02

INVOICE NO: 25322

RESPONSIBLE ATTY: CCC

RE:	First Day Motions and DIP Financing	HOURS
12-05-24		
CCC	Review e-mail from Committee counsel re DIP funding.	0.10
01-06-25		
AAI	Review DIP loan funding and analyze DIP loan funding use towards professionals fees (.40); prepare motion to approve post-petition financing (1.80).	2.20
01-14-25		
AAI	Further revisions to the motion to approve litigation funding agreement (.90); prepare ex parte motion to shorten time hearing on litigation funding agreement and employment application (.80).	1.70
01-15-25		
CCC	Begin review and revisions to 364 motion re litigation funding (.80); multiple e-mails re scope of Gray prejudgment liens and review pleadings (.40).	1.20
01-16-25		
CCC	Revise financing motion (1.00); review local rules and work on motion to shorten time (1.50); prepare e-mails to UST and Committee re shortening time and background (.70); call with Committee counsel re same and shortening time and review e-mails re same (.30); revise NOH on motion (.10); e-mails with Glass and client re funding questions and e-mails with committee re same (.20).	3.80
01-21-25		
CCC	E-mails with UST and client re litigation funder disclosure.	0.20
01-22-25		
CCC	Organize and forward e-mails re litigation funder to AAI and review prelim draft of declaration.	0.10

**CHOI & ITO**Page: 2  
09 -30-25Imperial Pacific International (CNMI) LLC  
First Day Motions and DIP FinancingACCOUNT NO: 1815-02  
INVOICE NO: 25322

01-29-25

CCC	Respond to Halegua e-mail re employment and litigation funding issues (.20); follow up e-mails with client re litigation funding issues (.20).	0.40
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SUB TOTAL	9.70	\$3,780.00
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## FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	5.80	\$450.00	\$2,610.00
Allison A. Ito	3.90	\$300.00	\$1,170.00
STATE TAX			<u>178.11</u>
TOTAL FEES			\$3,958.11
TOTAL EXPENSES			<u>\$0.00</u>

<b>TOTAL CURRENT WORK</b>	<b>\$3,958.11</b>
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Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-03

INVOICE NO: 25323

RESPONSIBLE ATTY: CCC

RE:	Employment/Fee	HOURS
11-01-24		
CCC	Review e-mail from Committee counsel and respond to e-mails from Chen re fee statements; review Chen fees.	0.30
AAI	Further revise C&I First Interim Fee application (.30); read Chen's interim fee request (.20); prepare first interim fee application for Michael Chen Law Office (1.70); e-mail McDonald regarding 1st interim fee application (.10).	2.30
11-04-24		
CCC	Follow up on Veritas invoice payment (.10); review draft Chen fee application (.10); work on C&I interim fee application (2.50).	2.70
AAI	Revise fee application and e-mail Chen re same.	0.30
11-05-24		
CCC	Respond to Committee counsel re fee application issue and follow up re filing dates (.10); review e-mail re notice for fee application and forward same to Committee (.10); final changes to C&I fee application (1.00).	1.20
AAI	Further revisions to Chen 1st interim fee application (.30); further work on C&I interim fee application (1.80); e-mails with Wang regarding interim fee applications for debtor's professionals (.10).	2.20
11-06-24		
CCC	Review e-mails re summary of C&I fees and fee application of Chen.	0.10
AAI	Finalize Choi & Ito 1st interim fee application for electronic submission (2.70); finalize Chen 1st Interim Fee application for electronic submission (.80).	3.50

**CHOI & ITO**Page: 2  
09 -30-25Imperial Pacific International (CNMI) LLC  
Employment/FeeACCOUNT NO: 1815-03  
INVOICE NO: 25323

11-07-24

CCC Review fee application Committee counsel NOH. 0.30

AAI Read fee applications for Arent Fox and Chambers Law. 0.30

11-16-24

CCC Review UST and Aram e-mail. 0.10

AAI Read UST e-mail regarding 1st interim fee application and confer with CCC re same; read e-mail from Ordubegian regarding interim fee application. 0.20

11-18-24

CCC Review e-mails from Chi re fees and objection. 0.10

11-20-24

CCC E-mails with UST re fee application and additional requirements. 0.20

11-21-24

CCC Review client e-mail re professionals and prepare detailed response with invoices (.40); review AAI analysis of fees and prepare e-mails to client (.20). 0.60

AAI Read Intrepid invoice and order approving employment and consider whether fee application is required (.20); review Verita October invoice and consideration of whether additional fee application is required (.10); read e-mail from client regarding ArentFox fee application (.10); analysis of ArentFox interim fee application (.30). 0.70

12-10-24

AAI Prepare supplemental declaration in support of first interim fee application. 0.40

12-11-24

CCC E-mails with Intrepid and client re retainer check (.10); e-mails with UST re supplemental dec and review same (.10). 0.20

AAI Prepare supplemental declaration in support of first interim fee application (.20); e-mails with UST re same (.10); prepare for hearing on interim applications (.30). 0.60

**CHOI & ITO**Page: 3  
09 -30-25Imperial Pacific International (CNMI) LLC  
Employment/FeeACCOUNT NO: 1815-03  
INVOICE NO: 25323

12-12-24	AAI	Prepare for and attend hearing on C&I fee application.	0.40
12-13-24	AAI	Revise order granting 1st interim fee application.	0.30
12-19-24	CCC	Review and circulate KCC invoice.	0.20
12-20-24	CCC	Review proposed HK lawyer agreement and funding agreement and provide detail comments (1.50); call re same (.30).	1.80
	CCC	Review e-mails re CPA and employment.	0.10
12-22-24	CCC	Call with HK counsel re Chan litigation and employment.	0.40
12-26-24	CCC	Confer with AAI re KCL engagement and e-mail re same (.10); revise KCL engagement agreement (1.30); call with HK team re engagement issues (.40); call with client rep re collection and enforcement issues (.30); call UST re 328 issues (.30).	2.40
	AAI	Revise retention agreement.	1.70
12-30-24	CCC	Review and comment on fee orders for C&I and Chen.	0.10
	AAI	Further revise order on 1st interim fee application for C&I for submission to chambers (.30); revise order on 1st interim fee application for Chen for submission to chambers (.30).	0.60
12-31-24	CCC	Further edits to HK counsel's engagement letter and prepare e-mail to UST re same (1.00); prepare e-mail to HK counsel re same (.10).	1.10
01-02-25	CCC	Review fee orders and e-mail to client (.10); leave message and e-mail to UST re review HK counsel's engagement (.10); review KCL edits to agreement and comments; e-mails with group (.30).	0.50

**CHOI & ITO**Page: 4  
09 -30-25Imperial Pacific International (CNMI) LLC  
Employment/FeeACCOUNT NO: 1815-03  
INVOICE NO: 25323

01-04-25	AAI	Read UST comments on draft engagement letter by proposed special litigation counsel regarding Hong Kong collection matter.	0.10
01-05-25	CCC	Review budget and e-mail AAI re payments due to professionals.	0.20
01-06-25	CCC	E-mails with Chen re payment of fees (.10); work on reconciling KCL engagement with extensive UST comments (1.80); prepare e-mail to KCL re changes to engagement (.20); revise litigation funding agreement (1.00); conference call with KCL (1.00); prepare follow up e-mail to KCL re clean and redline (.10).	4.20
01-07-25	CCC	Review and prepare e-mail re fee calculation.	0.30
01-08-25	CCC	E-mails with client re payment of professionals and e-mail with counsel re wire info.	0.10
01-09-25	CCC	Review further edits and make additional changes; prepare e-mail to KCL re changes (.40); e-mails with client re strategy (.10).	0.50
01-10-25	CCC	Review e-mails re HK counsel.	0.10
	AAI	E-mail Ching regarding Funding agreement and HK litigation counsel retainer letter (.10); prepare redline re same (.30).	0.40
01-14-25	CCC	E-mail with UST re KCL and forward communications.	0.10
	AAI	Prepare application to employ KCL as special litigation counsel.	0.80
01-15-25	CCC	Call with UST re background of HK litigation and e-mail from UST re KCL and funding issues (.70); revise KCL application and send different drafts (.40); call with KCL and team re same and scheduling (.60).	1.70
01-16-25	CCC	Review revised employment application and e-mails with KCL re same (.20); make revisions to engagement letter and prepare	0.80



**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Employment/Fee

Page: 5  
09 -30-25

ACCOUNT NO: 1815-03  
INVOICE NO: 25323

e-mail to KCL re changes and follow up e-mails with KCL confirming changes (.60).

AAI	Finalize employment application (.80); finalize financing motion (1.40); finalize ex parte motion to shorten time (.70); revise order re shorten time (.80); prepare notice of hearing (1.20).	4.90
01-22-25		
CCC	E-mails with KCL re status of HK litigation and UST discussions.	0.10
AAI	Prepare supplemental declaration of Kelven Wong.	0.40
01-23-25		
AAI	Revise supplemental declaration and litigation funding agreement.	0.40
01-26-25		
CCC	Revise litigation funding agreement and circulate.	0.30
01-30-25		
CCC	E-mails with UST and Committee re employment and funding motion and order (.10); review files and prepare for hearing and e-mail KCL re outcome (.70).	0.80
02-03-25		
CCC	E-mails with KCL re engagement and financing agreement; finalize and circulate agreements for execution.	0.30
02-05-25		
CCC	E-mails with client and KCL re scope of potential admin claim by solicitors and investors (.30); revise orders and circulate (.30).	0.60
AAI	Read e-mails regarding retention.	0.10
02-06-25		
CCC	Review and respond to detailed e-mail from KCL (.10); call with client re same (.30).	0.40
02-07-25		
CCC	Review files and prepare detailed response to KCL re funding issues.	0.80
02-08-25		
CCC	Review billing from ArentFox and circulate.	0.10

**CHOI & ITO**Page: 6  
09 -30-25Imperial Pacific International (CNMI) LLC  
Employment/FeeACCOUNT NO: 1815-03  
INVOICE NO: 25323

02-12-25			
CCC	Review and respond to e-mail from KCL.	0.30	
02-27-25			
CCC	Review e-mail re fee applications.	0.10	
03-24-25			
CCC	Review e-mails from HK counsel (.10); and order (.10).	0.20	
AAI	Work on employment orders.	0.30	
03-26-25			
CCC	Finalize and submit orders (.30); e-mails and call with client re same and work on response to detailed inquiry from KCL (1.30).	1.60	
03-27-25			
CCC	Review assignment and finalize e-mail to KCL.	0.30	
03-28-25			
CCC	Prepare e-mail to counsel re KCL and funding orders.	0.10	
03-30-25			
CCC	E-mails from UST and Committee re forms of order.	0.10	
05-02-25			
CCC	E-mails with Chen re fee application.	0.10	
06-13-25			
CCC	Review KCC billing.	0.10	
09-05-25			
CCC	Review Verita e-mails re payment and e-mails with M. Chen re same.	0.10	
09-11-25			
AAI	Read e-mails from CCC and Wong re Stevedore admin claim.	0.10	
SUB TOTAL		47.80	\$18,360.00

## FEE SUMMARY:

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	26.80	\$450.00	\$12,060.00

**CHOI & ITO**

Page: 7  
09 -30-25

Imperial Pacific International (CNMI) LLC  
Employment/Fee

ACCOUNT NO: 1815-03  
INVOICE NO: 25323

Allison A. Ito	21.00	\$300.00	\$6,300.00
STATE TAX			<u>865.12</u>
TOTAL FEES			\$19,225.12
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			\$19,225.12

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

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Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-04

INVOICE NO: 25317

RESPONSIBLE ATTY: CCC

RE:	Creditors and Claims	HOURS
11-05-24		
CCC	Review various e-mails re payment of contempt settlement and hearing.	0.10
11-06-24		
CCC	Call from Halegua re arbitration demand.	0.10
11-07-24		
CCC	Review IPI POC (.10); call with client and Chen re arbitration demand re CNMI claim and review letters (.90); call from Halegua re same (.80); check license and e-mails with Chen re arbitration provision and e-mail with AAI re research (.20); prepare e-mail to client re fees and potential claim objection (.50).	2.50
11-21-24		
AAI	Review claims filed by BigBang Entertainment, Fanter, and Artman corporation (.30); video conference with CCC and client regarding case status and next steps (.90).	1.20
11-23-24		
CCC	Review and respond to client question re stipulation and proceeds.	0.10
11-24-24		
CCC	Review DOL POC.	0.10
11-25-24		
AAI	Read POC #37 and e-mail with CCC regarding priority status.	0.10
11-30-24		
AAI	Read various POCs	0.20

**CHOI & ITO**Page: 2  
09 -30-25Imperial Pacific International (CNMI) LLC  
Creditors and ClaimsACCOUNT NO: 1815-04  
INVOICE NO: 25317

12-03-24		
CCC	Respond to client e-mail re creditor and bar date (.10); e-mails with Gray counsel re stipulation (.10).	0.20
12-04-24		
CCC	E-mails with Gray counsel re stip and next steps (.10); review spreadsheet and e-mail from claims adjuster and forward (.20).	0.30
12-09-24		
CCC	Prepare response to client e-mail re Gray litigation.	0.20
12-10-24		
CCC	Review e-mail and attachments from Halegua re additional motion to disburse.	0.10
12-16-24		
CCC	Review Gray Fanter motion re proceeds.	0.20
12-17-24		
CCC	Review Fanter motion re vehicle auction proceeds (.20); review info from Chi re patrons (.10).	0.30
12-18-24		
CCC	Call with committee counsel re bid procedures(.40); call with Stevedore's counsel and review POC and other information (.80).	1.20
AAI	Read e-mail from Seman regarding shipping containers disposition and payment demand.	0.10
12-19-24		
CCC	Review and forward Halegua e-mail re stipulation; call with Committee counsel re bid procedures.	0.50
12-24-24		
CCC	Review bar date; e-mails with Committee counsel re additional claims.	0.30
AAI	Read e-mails from CCC and Ordubegian regarding regarding patron deposits.	0.10
12-26-24		
CCC	Call from IRS re taxes and prepare e-mail to client and respond to e-mails (.40); and KCL issues (1.50).	1.90
01-02-25		
CCC	Review e-mail exchange re potential committee settlement with Gray.	0.10

**CHOI & ITO**Page: 3  
09 -30-25Imperial Pacific International (CNMI) LLC  
Creditors and ClaimsACCOUNT NO: 1815-04  
INVOICE NO: 25317

01-03-25		
CCC	Call with UST re KCL and financing (.30); conference call with KCL re retention (.50).	0.80
01-04-25		
CCC	Review detailed comments from UST and forward.	0.10
01-06-25		
CCC	E-mails and call with Halegua (.20); e-mails with Committee re order and contact with Glass (.10).	0.30
01-07-25		
CCC	Review files and call with Committee counsel re status (.30); further e-mails with counsel re agreement and contact court (.10); call with counsel for CNMI (.70); prepare e-mail to Committee re request to extend (.30).	1.40
01-08-25		
CCC	E-mails with Committee counsel re cure notices (.10); call with Glass re term sheet (.10).	0.20
01-15-25		
CCC	E-mails with Halegua re dismissal of appeal (.10); call with Halegua re status of sale and next steps (.60); e-mails with client re same and review e-mails and proposed stipulation; circulate (.20).	0.90
01-20-25		
CCC	Review e-mails and changes to stipulation re Gray appeal.	0.20
01-21-25		
CCC	Review and circulate adjournment order re Ninth Circuit.	0.10
01-22-25		
CCC	E-mails with client and ArentFox re wire.	0.10
02-03-25		
CCC	E-mails with Committee counsel re status of sale motion and contact with lender.	0.10
02-05-25		
CCC	Review and forward e-mail from creditor counsel re sale.	0.10
02-06-25		
CCC	Review e-mail from counsel for Saipan stevedores and circulate (.10); call with counsel re sale and payment issues (.40).	0.50

**CHOI & ITO**Page: 4  
09 -30-25Imperial Pacific International (CNMI) LLC  
Creditors and ClaimsACCOUNT NO: 1815-04  
INVOICE NO: 25317

02-11-25			
CCC	Review RFS motion and declarations and circulate (.30); review notice of hearing date and e-mail re opposition dates (.10); review e-mails and respond to Halegua re fees (.10).	0.50	
02-14-25			
CCC	Call with Halegua re plan and sale issues.	0.40	
02-18-25			
CCC	Call from IRS revenue officer re bankruptcy and claim.	0.30	
02-20-25			
CCC	E-mails with Glass re call and auction (.10); e-mails with Committee counsel re LBR and RFS motion (.10); prepare e-mail to Stevedore counsel re continuance of hearing and defective NOH (.30).	0.50	
02-26-25			
CCC	Call with Committee counsel re term sheet from Halegua (.30); review IRS POC and e-mail client re priority issues (.30) review files and participate in call with creditors re settlement term sheet and follow up call with bankruptcy counsel for Gray (.70); confer with AAI re same (.10).	1.40	
02-27-25			
CCC	Call from Sit counsel re Sit's admin claim.	0.20	
03-03-25			
CCC	Call with Committee counsel re creditor issues (.20); review and circulate joint opposition to Stevedore RFS motion; final changes to opposition (3.00).	3.20	
	AAI	Draft opposition to the relief from stay motion.	4.00
03-04-25			
CCC	Call with creditor (.30); review filings (.20).	0.50	
	AAI	Review notices of tax lien and proof of claim filed by DRT to determine amount of claim asserted as penalty (.30); e-mail client for debtor's records additional information re same (.10); read Grays' opposition to Stevedores' relief from stay motion (.10).	0.50
03-05-25			
AAI	Research re DRT tax lien breakdown and e-mails with Committee Counsel re same.	0.30	

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Creditors and Claims

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03-06-25			
CCC	Analyze latest Halegua proposal.	0.30	
AAI	Read settlement proposal from Halegua.	0.20	
03-07-25			
CCC	Call with Committee prior to discussion with counsel re settlement of secured claims and potential objection to sale (.30); conference call with counsel re same (.80).	1.10	
03-08-25			
CCC	E-mail with Saipan Stevedores re RFS hearing.	0.10	
03-09-25			
CCC	Review proposed stipulation for continuance and related e-mails (.10); review e-mail from HK law firm and e-mails with client re same (.20).	0.30	
03-10-25			
CCC	Respond to e-mail from counsel re RFS continuance.	0.10	
03-12-25			
CCC	Review and circulate notice of hearing on RFS.	0.10	
03-18-25			
CCC	Review and sign off on stipulation re RFS motion.	0.10	
03-21-25			
CCC	Call with Halegua and follow up with Ordubegian.	0.20	
03-24-25			
AAI	Read e-mails and attachment regarding stipulation re proceeds.	0.30	
03-25-25			
CCC	Review IRS POC and e-mails with Chi re same.	0.30	
AAI	Read e-mails from Chi regarding IRS tax lien.	0.20	
03-26-25			
CCC	Review IRS analysis and prepare e-mail to Committee re IRS (.60); call with Committee counsel re admin claims (.20); further e-mails	1.10	



**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
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with counsel re admin claims and sale proceeds and final reconciliation of IRS claim (.30).

AAI	Research claims by CNMI and IRS.	0.20
04-01-25		
CCC	Review filed stipulated order re sale and forward to Stevedore counsel re continuance; further e-mails re scheduling and sign off on Stevedore continuance.	0.20
04-03-25		
AAI	Read redlined settlement agreement from Fritz.	0.10
04-09-25		
CCC	Review e-mail exchange re status of settlement (.10); call with Sit counsel re status (.20); call with Committee counsel re negotiations and carve out issues (.50).	0.80
AAI	Review various e-mails among Wong and CCC regarding negotiations with CNMI and status.	0.10
04-15-25		
CCC	Call with Committee counsel re status of settlement discussions.	0.20
04-27-25		
CCC	Respond to Halegua e-mail re RFS motion.	0.40
05-05-25		
CCC	Call from creditor counsel re status.	0.10
05-16-25		
CCC	E-mail to Committee re status of closing communicate with Halegua re same.	0.10
05-29-25		
CCC	Call with Halegua re sale closing delays and appeal issues (.50); e-mails with buyer counsel re banking issue and review and prepare response to Committee counsel re DPL issues (.30).	0.80
06-03-25		
CCC	E-mails with Saipan Stevedore counsel re delay in closing.	0.10
06-11-25		
CCC	E-mails with counsel re status of closing delays.	0.10

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06-26-25

CCC Prepare e-mails re DPL and assignment of lease (.10); call with buyer counsel re same (.20); conference call with Committee, buyer and CNMI counsel prior to hearing (.30); review files and participate in hearing (.50); call with client re closing issues (.40); prepare e-mail to CNMI counsel re assignment of lease (.40). 1.90

07-03-25

AAI Read e-mail from IRS and confer with CCC re same. 0.10

08-27-25

CCC Call from counsel for Saipan Stevedore about payment. 0.10

09-01-25

CCC Review amended POCs (.10); e-mails with Halegua re next steps and scheduling (.10). 0.20

09-03-25

CCC Review files prior to call with Halegua re plan (.30); call with Halegua and JP re plan issues (.60); review Stevedore claim (.10). 1.00

09-05-25

AAI Read amended POCs. 0.10

09-06-25

CCC Review files and e-mail to Chi re prepetition 941 taxes. 0.20

09-08-25

CCC E-mail with Chi re tax and payroll and follow up (.10); review and forward Committee e-mail re Stevedore claim (.10). 0.20

09-09-25

AAI Read e-mail from Wang re Stevedore administrative expense claim. 0.10

09-10-25

CCC Call with Committee counsel re liquidation issues. 0.50

09-11-25

CCC E-mails with committee and Seman re Stevedore admin claim. 0.20

09-12-25

CCC Revise and circulate stipulation with Saipan Stevedores (.90); begin work on list of admin creditors (.10). 1.00

09-13-25

CCC Call from Sit counsel re admin claim. 0.20

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
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09-16-25				
CCC	Call with Stevedore counsel re admin claim.	0.20		
09-17-25				
CCC	Respond to Committee e-mail re Saipan Stevedore (.10); call with Committee counsel re same (.10); call with Seman re admin settlement (.10).	0.30		
09-18-25				
CCC	E-mails and call with Wong re further negotiations with SS (.10); review and revise stipulation allowing SS claim (.60).	0.70		
	AAI	Draft stipulation allowing Stevedore Administrative Expense Claim (.80); draft order approving stipulation allowing Stevedore Administrative Expense claim (.60).	1.40	
09-19-25				
CCC	Revise further redline of stipulation re Stevedore and e-mails with counsel for Committee and Stevedore re allowance (.20); review final submissions (.10).	0.30		
	AAI	Finalize stipulation for electronic submission (.20); finalize order approving stipulation for submission to clerk (.60).	0.80	
09-23-25				
CCC	Review e-mail and tax filing attachments (.20); prepare e-mail to client and prepare e-mail to Committee re same (.20); call with DIP lender counsel (.10).	0.50		
	SUB TOTAL	44.10	\$18,330.00	
FEE SUMMARY:				
ATTORNEY	HOURS	RATE	TOTAL	
Chuck C. Choi	34.00	\$450.00	\$15,300.00	
Allison A. Ito	10.10	\$300.00	\$3,030.00	
	STATE TAX			863.71
	TOTAL FEES			\$19,193.71

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Creditors and Claims

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TOTAL EXPENSES \$0.00

TOTAL CURRENT WORK **\$19,193.71**

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

Phone: (808) 533-1877  
Fax: (808) 566-6900  
E-mail: hibklaw@hibklaw.com

Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-05

INVOICE NO: 25318

RESPONSIBLE ATTY: CCC

RE:	Casino License Matters	HOURS	
11-23-24			
AAI	Read e-mail from Chen on status of 9th circuit appeal.	0.10	
11-25-24			
AAI	Read e-mail from client regarding correspondence from Commonwealth Casino Commission's chairperson and potential response.	0.10	
11-27-24			
AAI	Read e-mail from client with summary of CCC matters.	0.10	
12-17-24			
CCC	Prepare response to Chen re License and litigation issue.	0.30	
12-24-24			
AAI	Read e-mail regarding December Casino Commission meeting.	0.10	
01-22-25			
CCC	Prepare e-mail to Sit counsel re changes to casino license provision.	0.10	
01-26-25			
CCC	E-mails re status of funding letter.	0.10	
09-16-25			
CCC	Call with Yanza re license issues and call with Chi re same.	0.70	
09-17-25			
CCC	Review e-mail from Halegua and prepare e-mail to committee and Halegua re status of casino negotiations.	0.40	
SUB TOTAL		2.00	\$840.00

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Casino License Matters

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INVOICE NO: 25318

**FEE SUMMARY:**

ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	1.60	\$450.00	\$720.00
Allison A. Ito	0.40	\$300.00	\$120.00
STATE TAX			<u>39.58</u>
TOTAL FEES			\$879.58
TOTAL EXPENSES			<u>\$0.00</u>

**TOTAL CURRENT WORK** **\$879.58**

Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

Phone: (808) 533-1877  
Fax: (808) 566-6900  
E-mail: [hibklaw@hibklaw.com](mailto:hibklaw@hibklaw.com)

Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-06

INVOICE NO: 25319

RESPONSIBLE ATTY: CCC

RE:	Asset Disposition, Plan and Disclosure Statement	HOURS
11-04-24		
CCC	Call and video conference with counsel for DIP lender re status of bid and interest (.50); call with team re upcoming status conference (.70); e-mails re status conference (.10).	1.30
AAI	Video conference with CCC, McDonald and client regarding case status (.60); review several motions to waive appearances by various counsel (.10).	0.70
11-05-24		
CCC	E-mails with Keen Summit re status (.10); call with Committee counsel re status (.30); prepare for status conference and attend conference (1.80); call with client and team re next steps (.70).	2.90
AAI	Prepare for and attend status conference (.60); video conference with CCC, co-counsel and client regarding case status and next steps (.70).	1.30
11-08-24		
CCC	Review and circulate Intrepid marketing materials.	0.20
11-21-24		
CCC	Call with client re fees and marketing and claims issue.	0.90
11-22-24		
CCC	Review marketing update and prepare e-mail to client re strategy.	0.60
11-23-24		
CCC	Review notes and prepare for call with Committee counsel (.20); call with Committee counsel re sale issues (.50); prepare summary to client (.50).	1.20

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Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06  
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11-25-24

CCC E-mail with Keen-Summit re status. 0.10

AAI Read summary from CCC regarding call with Ordubegian on status of sale and marketing of the property (.10); read e-mail from client regarding marketing status (.10); read e-mail from Comstock regarding a/r information (.10). 0.30

11-26-24

AAI Read e-mails from CCC and Comstock regarding receivables and litigation financing (.10); video conference with CCC and client regarding marketing status (.80). 0.90

12-03-24

CCC Call with UST re status of case. 0.10

12-05-24

CCC Call with Committee counsel re status of Intrepid marketing. 0.30

12-06-24

CCC E-mail to Intrepid re status call (.10); prepare e-mail to client re Committee/Intrepid issues (.40). 0.50

12-09-24

CCC Review proposed bidding procedures (.50); call with committee counsel re same (.10). 0.60

12-10-24

CCC Review AAI summary of terms and confer with AAI re same (.20); call with Intrepid and Committee re bid procedures (.50); call with client re same (1.80). 2.50

AAI Read and summarize draft bid procedures motion from Committee Counsel (.60); video conference with CCC, Wong, Wang and Intrepid re marketing status (.50); video conference with CCC, McDonald and client regarding case status (1.80). 2.90

12-11-24

CCC Review files and begin work on status conference report. 3.30

12-12-24

CCC Calls with Committee counsel re status and bidding procedures (.80); call with Halegua re motion re pre-petition sale (.20). 1.00

CCC Further review of files and work on status conference report (3.50); call with Sit counsel re sale and DIP funds (.30); prepare for 4.90



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09 -30-25Imperial Pacific International (CNMI) LLC  
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06  
INVOICE NO: 25319hearing and attend status conference (.80); review client e-mail re  
process and reply (.30).

AAI	Finalize status conference report.	1.20
AAI	Prepare for and attend status conference (.70); read e-mails from CCC and client regarding hearing outcome (.10).	0.80
12-13-24		
CCC	Call with team re status of sale and next steps.	1.60
AAI	Video conference with CCC and client regarding hearing and next steps.	1.60
12-19-24		
CCC	Call with potential counsel re background (.50); prepare agenda for call and prepare for call (.80); call with client re bidding issues (1.10).	2.40
AAI	Video conference with CCC and client regarding bid procedures stipulation and status of DIP funding and marketing of assets.	1.10
12-22-24		
CCC	Prepare e-mail to Muzzi re background and pleadings (.50); e-mail and call with JP re bankruptcy counsel (.20).	0.70
12-23-24		
CCC	Review and edit proposed joint bid procedures (1.00); review Committee revisions (.40); call with Committee counsel (.50); call with client (.30).	2.20
AAI	Video conference with CCC, Wong and Ordubegian regarding the bid procedures.	0.50
12-26-24		
CCC	Confer with AAI re preliminary title report (.10); work on revising reformatted committee joint bid procedures (1.30).	1.40
CCC	Call with Committee re joint bid procedures.	0.60
AAI	Video conference with CCC and committee counsel regarding bid procedures.	0.40

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12-28-24	CCC	Work on redlining stipulated bid procedures order and ancillary pleadings (2.50); prepare e-mail to Committee counsel re comments (.10); prepare e-mail to client re same (.20) .	2.80
12-29-24	CCC	Prepare for call re bid procedures (.40); e-mail comments to Committee counsel and review e-mails from Committee counsel (.20); call with team re bid procedures and next steps (1.00).	1.60
12-30-24	CCC	Respond to Chi e-mail re additional creditors (.10); prepare for call with Committee (.20); call with Committee re revisions and creditors (.50); confer with AAI re schedule of secured claims and review same (.10).	0.90
	CCC	Prepare e-mail to client with update.	0.40
	AAI	Video conference with CCC, Wong and Wang regarding bid procedures (.50); analyze title report regarding encumbrances (.30).	0.80
12-31-24	CCC	Prepare e-mail to client re proposed changes to stipulated order and forward further redline.	0.40
01-01-25	CCC	Review redline from Committee and prepare for call with client (.40); call with client re bid and timing issues (.90).	1.30
01-02-25	CCC	Review further redline from Committee to sale stipulation (.20); call with Committee counsel re same and stipulated order issues (.50); review e-mails re title reports and response to question re data room (.10); review and edit ancillary pleadings and prepare e-mail to Committee (1.40); review and forward request re gambling debts and respond to Intrepid (.10).	2.30
	AAI	Read e-mail from Halegua regarding proposal to distribute proceeds of gaming equipment and read Halegua's proposed order to distribute sales proceeds from Debtor's vehicles (.10); video conference with CCC, Wong and Wang regarding stipulated bid procedures order (.50).	0.60
01-03-25	CCC	Respond to e-mail from Committee re changes (.10); prepare e-mail to client re same (.20).	0.30

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AAI	Read e-mails from CCC and Wong and revised stipulation regarding bid procedures.	0.20
01-05-25		
CCC	Review and respond to client e-mail re bid procedures.	0.40
01-06-25		
CCC	E-mail to Sit counsel re bid procedures and calls with counsel (.30); call with Mok re bid and status (.30).	0.60
01-07-25		
CCC	Call with Sit counsel re background (.90); call with client re status (1.00); work on term sheet (1.50).	3.40
AAI	Video conference with CCC and client regarding case status.	1.00
AAI	Video conference with CCC and Muzzi regarding engagement (.80); follow up with chambers regarding bid procedures order and read filed order on bid procedures (.20).	1.00
01-08-25		
CCC	Calls with Sit counsel (1.00); further work on term sheet (2.00); call with client re term sheet (1.10).	4.10
AAI	E-mail Muzzi redline term sheet (.30); video conference with CCC and Muzzi regarding draft term sheet (.40); further video conference with CCC, JP and Muzzi regarding deal terms (.50); video conference with CCC and client regarding transaction (1.10); e-mail Wang regarding sale notice (.10).	2.40
01-09-25		
CCC	E-mail to Committee re cure amount and e-mail to Sit counsel re document (.10); call with Wong re same (.10); confer with AAI re Schedule 1 to notice and discrepancy (.10).	0.30
AAI	Read and respond to e-mails from committee counsel regarding notice of cure costs and notice of sale (.20); revise notice of cure costs (.80); revise notice of sale (.30).	1.30
01-10-25		
CCC	Review DPL lease approval requirements and prelim research re same (.80); review e-mails and proposed notices of cure and call with AAI re same (.30); review e-mails re service (.10); conference call with Sit counsel re term sheet and logistics (.40).	1.60

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AAI	Telephone call with C. Wong regarding sale notice and notice of potential cure costs (.30); review and comment on Wang's revised draft notices (.20); finalize notices for electronic submission (.40); research caselaw on whether a prospective bidder must comply with all lessee prerequisites under the lease (1.10); conference call with CCC and Muzzi regarding stalking horse (.40).	2.40
01-12-25		
CCC	E-mails with client and counsel for Sit (.20); conference call with team re sale issues (.90).	1.10
AAI	Video conference with CCC and client regarding transaction.	0.90
01-13-25		
CCC	Call with Committee counsel re status of offer (.50); call with Halegua re writ issues (.10).	0.60
CCC	Review redlined term sheet (.10); calls with Muzzi re same (.50); review Committee version of APA (.40); conference call with group re term sheet and strategy (.90).	1.90
AAI	Gather requested documents for Muzzi (.20); review Committee's redline APA (.10); read Sit's term sheet (.10).	0.40
01-14-25		
CCC	Review Muzzi redline and call re same (.20); prepare e-mail to and call with Committee counsel re term sheet and timing (.50); locate and circulate decision re assignment case (.30); prepare e-mail re finalizing term sheet (.10); call re term sheet and timing issues (.70).	1.80
AAI	Read Committee's APA (.20); video conference with CCC, Client and Muzzi regarding term sheet (.60).	0.80
01-15-25		
CCC	E-mails with Sit counsel and client re term sheet status; review final.	0.10
01-16-25		
CCC	Multiple e-mails with client and Sit re status of term sheet (.10); call with Sit counsel re status of APA (.20); circulate signed term sheet to Committee with cover e-mail (.10).	0.40
01-17-25		
CCC	Call from counsel for Committee and prepare e-mail to Intrepid re	0.40

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other offer (.20); follow up e-mails to client re offer and fiduciary duty (.20).

AAI	Read e-mails from CCC regarding new offer.	0.10
01-19-25		
CCC	Respond to e-mail from Intrepid and circulate (.10); call with team re next steps (.40); call with Muzzi re proof of funds (.10).	0.60
AAI	Video conference with CCC and client regarding stalking horse and APA.	0.40
01-20-25		
CCC	E-mails with Intrepid re status and call and scheduling e-mail (.20); further e-mails and call with client re proof of funds (.40).	0.60
AAI	Read e-mail from Comstock regarding status.	0.10
01-21-25		
CCC	Call with Sit counsel re status (.20); review and mark up redline from Sit (1.00); e-mails with client re good standing (.10); call with Intrepid re sale issues (.60); prepare e-mail to client re update (.20).	2.10
AAI	Read various e-mails from client regarding transaction.	0.20
01-23-25		
CCC	Call with Sit counsel re status and follow up re proof of funds.	0.20
01-24-25		
CCC	Prepare e-mail re status.	0.10
AAI	Read e-mail from CCC to client regarding transaction.	0.10
01-27-25		
AAI	Read redlined APA (.10); read numerous e-mails from Sit counsel and committee counsel re same and funding confirmation delay due to Lunar New Year (.10).	0.20
01-28-25		
CCC	Call with Committee counsel and call with Sit counsel re status of APA (.30); e-mails re status of funds letter and review and forward (.10); work on APA (1.50).	1.90

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AAI	Read e-mails from CCC and Committee regarding Sit offer and APA status (.20); video conference with CCC and client re same (.40); confer with CCC regarding various provisions in the APA (.20).	0.80
01-29-25		
CCC	Review funds letter and related e-mails (.10); confer with AAI re form of notice of designation and revisions to same (.20); e-mail exchanges with Intrepid and Committee re language and call with Wong re same (.20); review HK list of lenders and prepare further e-mail to Committee counsel re same (.10).	0.60
AAI	Read e-mails from CCC regarding asset purchase agreement from stalking horse bidder (.20); read e-mail regarding evidence of ability to close and e-mail Committee / Intrepid re same (.10); research re background information on financial company (.10); prepare notice of designation of stalking horse bidder (.70); e-mails with Wong re same (.10).	1.20
01-30-25		
CCC	Call with Committee counsel re status conference hearing (.20); call with Sit counsel re hearing (.10); prepare for status conference hearing (1.30); attend status conference (.80); follow up call with client re next steps (.70).	3.10
01-31-25		
CCC	Call with Sit counsel re hearing (.10); e-mails and call with UST re status of case and retention issue(.10); e-mails re proof of funds (.10).	0.30
02-01-25		
CCC	E-mails with Chi re contact from Shepard and e-mails re call with HK lender.	0.20
02-03-25		
CCC	Review files and locate final and redlined version of APA and circulate (.30); e-mails with client re same and escrow (.10); follow up e-mails with Intrepid re escrow (.10); call with Sit lender re loan (.30).	0.80
02-04-25		
CCC	E-mails with Committee counsel re motion to sell and Ultra contact (.10); call with Ultra re same (.30); call from Sit counsel (.10).	0.50
02-05-25		
CCC	Prepare e-mail re financing (.10); call with Committee counsel re HK banker and status of sale motion (.20); e-mails with McDonald	1.30

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re opening escrow (.10); call with team re sale issues (.80); prepare e-mail to counsel re escrow (.10).

AAI	Review stipulation regarding escrow (.30); prepare for call with client (.20); video conference with CCC and client regarding bidding an auction deadlines (.70).	1.20
02-06-25		
CCC	Review e-mails re escro and call re bidding issues.	0.40
AAI	Draft escrow instructions (2.40); read numerous e-mails from escrow regarding escrow instructions and opening of escrow (.20).	2.60
02-07-25		
CCC	Call with client re sale.	0.50
02-08-25		
CCC	Call with client and e-mails re deposit (.30); review and revise escrow agreement (1.00).	1.30
02-09-25		
CCC	Call and e-mail with Chi re deposit and bid procedures.	0.40
02-10-25		
CCC	E-mails with escrow re receipt of deposit and circulate (.10); prepare e-mail to Ultra (.10); prepare e-mail to consultant re bidding procedures (.80); call with Chen re bidding issues (.20); call with client re same (.30); call with Sit lender and Committee counsel (.10).	1.60
02-11-25		
CCC	E-mails with client re status (.10); call with Committee counsel re RFS and sale (.10); review draft sale motion (.50); prepare e-mail to potential counsel and calls with potential counsel re background (2.20); call from Sit counsel and prepare response to Sit counsel re Stevedores (.20); research re potential bidder (.70); call with consultant re license issues (.40); prepare e-mail to client re agenda and update (.10); participate in call with client (.70); call from potential bidder and e-mail putting counsel in touch(.10).	5.10
AAI	Video conference with CCC, McDonald and client regarding transaction status and Motion for relief from stay (.70); read and comment on draft sale motion (.30).	1.00

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02-12-25

AAI Revise sale motion. 1.40

02-13-25

CCC Review list of assumed contracts and e-mail to client (.10); e-mails and call with Sit counsel re litigation funding agreement issues (.80); prepare e-mail to potential counsel for bidder and call with counsel re background (.60); e-mail and call with Glass re sale issues (.30); prepare e-mail summary and circulate (.10); e-mails with Sit counsel re DPL lease issues (.10); various calls with S. Wang re sale motion and designation and conferences with AAI re same (.50); circulate UCC report (.10); e-mails with escrow and Intrepid re wire and overbid (.20); review various versions and work on substantial revisions to sale motion (2.50); conference call with client re status of motion and declaration (.90). 6.20

AAI Analyzed lien reports and title reports regarding encumbrances and prepare summary chart re same (1.70); further revise sale motion (2.10); video conference with CCC and client regarding sale (.90); read e-mail from Wang (.10); finalize motion for electronic submission (.70). 5.50

02-14-25

CCC Follow up on NOH and review e-mails with Veritas re same (.10); prepare e-mail to counsel for potential bidder and call from counsel (.10); review NOH drafted by Committee and edit (.20); review e-mails re service address and contact client re same (.20); prepare e-mail to new counsel (.30). 0.90

AAI Follow up with Wang regarding sale motion (.10); revise notice of hearing on sale motion (.80); coordinate and research files regarding service matters (.70). 1.60

02-15-25

CCC Call with client re potential bidder. 0.50

02-16-25

CCC Calls with potential counsel and client re background and possible bidding. 0.70

02-17-25

CCC E-mails and call with Guam counsel for potential bidder re background and bidding process (.40) e-mails to Hawaii lawyer and client re same (.10). 0.50



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02-18-25

CCC Review notice of appearance and e-mail to Committee counsel 1.60  
(.40); calls from Sit counsel re status, potential bidding and DPL  
(.50); e-mails with Committee and client re status of Amended APA  
(.10); call with McDonald re status (.40); e-mail with bidder counsel  
re amended APA (.20).

02-19-25

CCC Respond to e-mails from counsel for bidder (.20); review e-mail and 0.90  
attachment from Glass re cure issue and circulate with comments  
(.20); call with counsel for Sit re status and Glass e-mail (.30);  
respond to McDonald (.20).

02-20-25

CCC Analyze King bid (.40); call with Aram re same (.20); call with 2.30  
Wong re Halegua and plan issues (.30); calls from Sit counsel re  
possible auction (.20); prepare e-mail to Intrepid re status of bids  
and arrange call (.10); call from King counsel re DPL and casino  
license issues (.40); review bid from Gray and attachments and  
DAC bid (.40); multiple e-mails re same (.30).

AAI Read bid and redlined PSA submitted by Team King (.20); read 0.70  
Joshua Gray bid (.20); read bid for receivables (.20); read and  
respond to e-mail from Team King's attorney regarding DPL Lease  
agreement (.10).

02-21-25

CCC Confer with AAI re competing bids (.10); call with Halegua re credit 2.40  
bid (.50); call with Committee counsel before and after Intrepid call  
(.50); conference call with Intrepid and Committee (.60); calls with  
bidder counsel re bidding and carveouts (.10); call with client re  
update (.60).

AAI Video conference with CCC, Committee and Intrepid regarding 0.60  
auction.

02-22-25

CCC Review Comstock e-mail re APA and breakup fee and APA; prepare 0.30  
e-mail to Yanza (.20); respond to Comstock e-mail re auction (.10).

02-23-25

CCC Review and forward e-mails re qualified bidders and call from Sit 0.50  
counsel re DPL and license concerns.

02-24-25

CCC Call from Sit counsel re concerns raised by CNMI response; follow 0.60  
up with client (.40); analyze term sheet from Halegua (.20).

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AAI	Read Comstock's notices to qualified bidders (.10); read e-mails from Halegua and Comstock regarding auction credentials (.10); read e-mail from Halegua regarding bidding (.10).	0.30
02-25-25		
CCC	Review overnight e-mails and calls with Intrepid and Committee re auction (.70); e-mails with FBI agent re files and abandonment (.10); calls with Sit counsel and King counsel re bid procedures issues and bid procedures (.50); review follow up e-mails re bidding issues (.20); prepare for and participate in auction (.80); follow up call with McDonald re auction and potential press release (.50); further e-mails with Halegua and Committee re call and prepare e-mail to client (.30).	3.10
AAI	Read numerous e-mails regarding auction logistics (.20); attend auction (.50); read e-mails from Comstock and Wong regarding auction results and notice re same (.10); read e-mail from Gray's counsel regarding bidding (.10); read e-mail from Committee counsel regarding CNMI discouraging buyer (.10).	1.00
02-26-25		
CCC	Review overnight e-mails from client and bidder counsel and respond (.20); e-mails with McDonald re closing and term sheet (.10); call with King counsel re DPL lease and default issues (.20); edit proposed notice of high bidder (.20); call with Muzzi re backup bid (.20).	0.90
02-28-25		
CCC	Review e-mails and extension stipulation (.20); e-mails re gambling debt purchase and follow up with buyer and circulate (.10); e-mails with McDonald (.10); e-mail with Halegua re container and RFS issue (.10); follow up e-mail and call with buyer counsel re container issue (.30).	0.80
03-05-25		
CCC	Review mew proposal (.30); call with Sit counsel re status (.20); call with King counsel re DPL negotiations (.10).	0.60
03-06-25		
CCC	Prepare detailed e-mail re status (.40); prelim research re carveout issues (1.00); conference call with client (.90).	2.30
03-07-25		
CCC	Review Glass e-mail re sale and License issues (.10); Call with Chen re litigation background re license (.50); prepare e-mail responses to Glass re License (.30); e-mails to counsel for both	1.20

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	buyers re sharing information with CNMI (.10); call from Sit counsel re same and status (.20).	
03-09-25		
CCC	Review multiple subpoenas and deposition notices and prepare e-mail summary; review responses.	0.90
03-10-25		
CCC	Call with Committee counsel re strategy and response (.50); review form of good faith declarations (.30); calls from Sit counsel re depositions (.40); calls from King counsel re same (.30); prepare for call and call with client (1.00); review motion to exceed and order (.10); call with Halegua re deposition scheduling and potential settlement (.50).	3.10
AAI	Read e-mails among Glass and CCC regarding Casino license provision in sale order (.10); read subpoena to Team King and Kaneko (.10); read e-mails among CCC and Halegua regarding Gray's intent to subpoena IPI and depose Chi and proposed subpoena (.10);	0.30
03-11-25		
CCC	Begin review oppositions and AAI summary (1.00); calls with Yanza and review draft declaration (.40); conference call with client re opposition (1.00).	2.40
AAI	Read and summarize CNMI and Gray sale motion objections (2.60); video conference with CCC and client regarding opposition to the sale motion (1.00).	3.60
03-12-25		
CCC	Review revised 30(b)(6) notice and circulate (.10); review and respond to e-mails re continuance and scheduling (.20); e-mails with Chen re rescheduling (.10); review revised Kaneko declaration and call with Yanza (.50); call with McDonald re opposition and strategy (.50); review motion to quash and motion to expediate (.20).	1.60
AAI	Read motion to quash filed by Team King and comment on same (.20); read e-mails regarding amending deposition schedule to accommodate deponents schedules (.10); read 30(b)(6) topics (.10).	0.40
03-13-25		
AAI	Read e-mail from Sit's counsel regarding response to objection to sale (.10); e-mails with court clerk regarding potential continued hearing date on sale motion (.10);	0.10

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03-14-25	CCC	work on sale issues	0.80
03-16-25	CCC	Review responses from counsel; e-mail with chambers and forward e-mail (.10); e-mails with Saipan Stevedore counsel (.10); call with buyer counsel (.10).	0.30
03-17-25	CCC	Multiple e-mails with chambers and Saipan Stevedore counsel re continuance and review pleadings (.50); call from Halegua and e-mails re same (.60); call with Ordubegian and e-mails re same (.40).	1.50
03-18-25	CCC	Review and forward Halegua response (.20); prepare e-mail to client re status (.40); calls with Committee counsel re potential settlement and structure (.40); review e-mails re secured claims and attachments (.20); calls with Fritz and Halegua re same (.60); confer with AAI re stipulated order to allow claims and work on stipulated order (.80).	2.60
	AAI	Work on reply in support of joint sale motion (2.70); read and respond to e-mail from Wang regarding GT building POC (.20); read and respond to e-mail from Wong regarding IRS claim (.20).	3.10
03-19-25	CCC	Review Intrepid subpoena (.20); review draft response by committee (.20); communicate with counsel re settlement (.10); further review of objections and begin work on reply (1.50).	2.00
	AAI	Read Gray's proposed subpoena to intrepid (.10); further work on reply in support of joint sale motion (1.80);	1.90
03-20-25	CCC	Review files, opposition, e-mails with work on reply brief.	5.00
	AAI	Work on reply in support of sale motion (2.80); read committee reply in support of sale motion (.20); read Sit's reply in support of sale motion (.10).	3.10
03-23-25	CCC	Multiple calls with Halegua re litigation and resolution (1.50); work on stipulation re 363 sale (4.50).	6.00

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03-24-25

CCC E-mails with client re sale and payment issues (.30); call with Committee counsel (.50); call with Sit counsel (.30); calls with Gray counsel (1.40); call to UST (.50); review revisions to stipulation (.20); conference call with client re sale issues (.50); e-mail and call with Yanza re same (.50). 4.20

03-25-25

CCC Review e-mails from client and draft e-mails to client re status and respond to questions (.30); calls with Halegua and Fritz re procedures and re call with AUST (.60); follow up calls and e-mail to Committee counsel re same (.80); review e-mails re depositions and deadlines and call with Committee (.20); conference call with Committee and Halegua and prepare e-mail to Committee re versions, redline and tax claim (1.00); e-mail to client re status of settlement (.30). 3.20

AAI Read e-mails regarding stipulation (.20); redline stipulation (.20). 0.40

03-28-25

CCC E-mails with counsel and client re continuance and liquidity issues; circulate to interested parties. 0.30

AAI Read e-mails from Halegua and Wong regarding settlement; research Debtor's cash position and feasibility to continue hearing date. 0.20

03-31-25

CCC Review and respond to multiple e-mails re scheduling stipulation and e-mails with buyer counsel. 0.20

AAI Read draft stipulation regarding sale motion. 0.00

04-01-25

CCC Prepare detailed response to HK liquidator inquiry (1.50); call with Halegua re potential new bidder (.70). 2.20

04-02-25

CCC Review e-mails and stipulation. 0.20

04-04-25

CCC Locate and compile information requested by buyer counsel and prepare e-mail. 0.80

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04-06-25	CCC	E-mails with buyer counsel and client re drawings and DPL issue .	0.20
04-07-25	AAI	Read and respond to e-mails from Yanza (.20); review and transmit files to Yanza in response to request (.20); read e-mails from Intrepid and CCC regarding potential overbidder (.10).	0.50
04-10-25	CCC	E-mails and call with Halegua re settlement (.70); call with client re status (.60); call with Yanza re same (.30); review e-mails re vehicles and assignment (.30).	1.90
	AAI	Read several e-mails from Yanza regarding Debtor's assets.	0.10
04-15-25	CCC	Prepare response to client re status of case and check court calendar; prepare reply (.30); e-mail to UST re terms of possible settlement (.30).	0.60
04-17-25	CCC	Review and sign off on stipulated proposal and circulate; call from Halegua re status of case and stipulation (.50); call with Sit counsel re status of sale and issues (.20).	0.70
	AAI	Read draft stipulated order re sale, stipulation resolving secured creditor sale objections (.20); read filed motion to extend time (.10).	0.30
04-18-25	CCC	Call from Committee counsel re resolution of objections and review redline and comment and e-mails re same (.50); further e-mail and call with UST re status of resolution (.30); call with client re same and strategy (.80).	1.60
	AAI	Review redline stipulation to resolve secured creditors objections to sale.	0.20
04-21-25	CCC	Review redlines and compare to prior versions (.20); e-mails with buyer counsel re gambling equipment sales (.10); call with client re stipulation (.40).	0.70
04-22-25	CCC	Review new agreement and redline and call with Halegua re same (.40); call with UST re status (.20); review e-mail from client re litigation funding and call with client re same (.60).	1.20

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AAI	Read e-mails among Halegua and Wong regarding language in the stipulation to resolve sale objections regarding provision concerning payment to CNMI.	0.10
04-23-25		
CCC	Review additional changes to stipulation and e-mails from counsel (.30); call from Muzzi re same (.20); e-mails with client re same (.10).	0.60
AAI	Review docket to confirm submissions in connection with sale motion pleadings (.20); prepare submission of Team King APA and e-mails with committee counsel re same(.40); read several e-mails from Glass and committee counsel regarding stipulation to resolve sale objections (.10).	0.70
04-24-25		
CCC	Review and follow up on Sit e-mail (.10); prepare e-mail to client re timing of closing and e-mail to Committee re same (.30); review and edit proposed good faith declaration (1.00).	1.40
AAI	Research files regarding escrow deposits (.10); read e-mails among CCC and Wong regarding transaction logistics (.10).	0.20
04-27-25		
CCC	Review sale order and e-mails with Committee counsel and buyer counsel.	1.00
04-28-25		
CCC	Calls with counsel for buyer and Committee prior to hearing (.90); e-mails to client and prepare for participate in hearing on sale motion (2.00); participate in hearing (.70); e-mails with buyer counsel (.20).	3.80
AAI	Prepare for and attend hearing on sale motion (.70); review draft order approving sale regarding security deposit return (.10); review filed-pleadings regarding mechanics of return of deposit (.20).	1.00
04-29-25		
CCC	Call from counsel re timing of closing (.30); prepare e-mail to counsel re form or sale order and review comments (.20).	0.50
AAI	Call with CCC regarding sale order; read redlined order from Sit's attorney; read additional redlines to sale order from Fritz.	0.20
04-30-25		
CCC	Prepare e-mail circulating sale order and call and e-mail from counsel re comments.	0.30

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AAI	Read e-mail from various counsel regarding sale order (.10); finalize order approving joint sale motion for submission to chambers (.30).	0.40
05-01-25		
CCC	Review and respond to buyer counsel e-mail re bond (.20); review sale order and circulate (.20).	0.40
AAI	Read e-mail from client regarding closing.	0.10
05-02-25		
CCC	E-mails with Yanza re assignment and review same and confer with AAI.	0.30
AAI	Review title reports and respond to question regarding assignment of lease (.10); revise of lease assignment (2.20).	2.30
05-05-25		
CCC	Call with counsel for buyer re closing issues and review and forward comments on assignment.	0.40
AAI	Follow up with CCC re assignment of commercial lease; read e-mails between CCC and Yanza regarding redlined assignment of commercial lease.	0.10
05-07-25		
CCC	E-mails with committee counsel and client re closing issues.	0.30
AAI	Read e-mails among CCC and Committee counsel regarding sale transaction.	0.10
05-08-25		
CCC	Call with Seman re status of sale and claim (.40); e-mail and call with client re same (.20).	0.60
AAI	Read e-mails among CCC and client regarding closing logistics.	0.20
05-09-25		
AAI	Work on closing documents.	0.70



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05-11-25		
CCC	Prepare e-mail to HK counsel re status of sale.	0.70
05-12-25		
CCC	Call Halegua re status of closing (.30); conference call with client (.30); e-mails with Muzzi (.10).	0.70
AAI	Read e-mails among CCC and HK counsel re transaction status.	0.10
05-14-25		
CCC	Call from Muzzi re deposit and review e-mail demand (.10); call with Yanza re status of sale (.20).	0.30
AAI	Read e-mail from Muzzi demanding return of good faith deposit.	0.10
05-15-25		
CCC	Call with Committee counsel re status of sale and refund of deposit (.30); prepare e-mail to counsel re same (.30); call with Sit counsel and forward escrow information (.10).	0.70
05-16-25		
CCC	Call from Yanza re status of closing and DPL issues.	0.20
AAI	Read e-mails from CCC and Committee counsel with transaction updates.	0.10
05-19-25		
CCC	Review e-mail re closing and respond; follow up e-mails with Sec Title (.30); call from McDonald re claims analysis (.30); follow up e-mails re same (.20).	0.80
AAI	Read e-mails from client and Sit counsel regarding return of deposit.	0.10
05-20-25		
CCC	Call with Yanza re status of closing and e-mails with client re same.	0.50
05-21-25		
CCC	E-mails with client re plan and creditor issues.	0.10
05-22-25		
CCC	E-mails with Chi re employee issues (.10); call with Chi re same and closing delays (.50); call with Halegua re closing delays (.20).	0.80

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05-28-25

CCC Review and respond to e-mails re bond and sale order (.10); call with Yanza re bonding impasse and 365 cure issues (.40); review amendment to lease re bond and sale order (.20); confer with AAI re same (.10); call with Committee counsel re status and strategy (.20); locate articles and prepare detailed e-mail to Committee re game plan (1.00). 2.00

AAI Confer with CCC regarding DPL Lease and bond requirement (.20); review DPL lease amendments and bonding requirements (.20). 0.40

05-29-25

AAI Read numerous e-mails regarding completion bond. 0.10

06-02-25

CCC E-mails and call with Yanza re status (.40); calls to DPL (.10); prepare e-mail to DPL re status and closing delays and prepare forwarding e-mail (.40); further e-mails re commission (.10). 1.00

06-03-25

CCC E-mails with parties re scheduling DPL call and follow up e-mails with Committee and e-mail with Yanza re DPL lease payments (.20); call with Yanza re status of closing and funding (.10); call client re same (.50); call with Wong prior to call with DPL (.30); call with DPL (1.00); prepare redline of assignment and e-mail to Yanza (.20). 2.30

06-04-25

CCC Prepare for and participate in call with client re closing issues and strategy (1.00); prepare follow up e-mails re closing (.20). 1.20

AAI Read e-mail from CCC and buyer's counsel re closing status. 0.10

06-06-25

CCC Review information from Glass re DPL demands. 0.30

06-09-25

CCC Call with Yanza re status of closing (.20) call with client re same (.20); call with Committee counsel re status and report (.60). 1.00

06-10-25

CCC Review draft status report and begin work. 0.50

06-11-25

CCC E-mails with Chi re security issue (.10); work on status conference report (3.30); check files and prepare e-mail to Yanza (.20). 3.60

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AAI	Finalized pre-status conference report for electronic submission.	0.00
06-12-25		
CCC	Call from UST re status and insurance (.60); calls with Yanza and Wong re hearing (.30); prepare for hearing and participate in status conference (.70); prepare e-mail to client (.20); follow up e-mails and calls re insurance and OSC (.30).	2.10
06-13-25		
CCC	E-mails with buyer and client re insurance and closing priorities (.40); e-mails with Committee counsel re same (.10); call with UST re status (.30); call from buyer counsel re insurance (.20).	1.00
06-16-25		
AAI	Read e-mails regarding closing (.20); video conference with CCC, client, buyer's counsel and buyer representative re transaction (.70).	0.90
06-17-25		
AAI	Prepare submission of insurance documents.	0.80
AAI	Work on response to OSC.	0.70
06-19-25		
AAI	Read e-mail from CCC to client re transaction status.	0.10
06-20-25		
CCC	Prepare e-mail to group re status.	0.30
06-23-25		
CCC	Prepare response OSC (3.00); conference with buyer (.70); conference with Committee (.60).	4.30
AAI	Read UST statement in response to OSC (.20); work on Debtor's response to order to show cause (.80); video conference with CCC, and buyer's counsel re transaction status (.70); video conference with CCC, committee counsel, and Gray's counsel regarding transaction status (.60); read committee response to OSC (.10).	2.40
06-30-25		
CCC	E-mail exchange with counsel re status of assignment signature and follow up with client and other counsel.	0.20
AAI	Read numerous e-mails from Yanza and glass regarding assignment of lease.	0.20

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07-02-25	CCC	E-mails with seller, CNMI and Committee re status of closing and deadlines.	0.20
	AAI	Read numerous e-mails from CCC, Yanza and committee counsel regarding transaction status.	0.10
07-08-25	CCC	E-mails re status of closing and dismissal of lawsuit.	0.10
	AAI	Read e-mails from CNMI government and committee counsel re stipulation to dismiss district court lawsuits.	0.10
07-09-25	AAI	Read numerous e-mails from NMI and Glass regarding status of DPL assignment; read e-mail from Yanza re escrow funding.	0.20
07-10-25	CCC	Review further e-mail thread re DPL lease assignment and closing.	0.10
07-11-25	CCC	Review request and locate documents for escrow.	0.30
	AAI	Draft pre-status conference report.	0.70
07-14-25	CCC	E-mails with CNMI, buyer and Committee counsel re status of assignment (.20); conference call with client, buyer and buyer counsel re assignment issues (.50); review dismissals of various lawsuits (.30); prepare status report (2.50).	3.50
07-15-25	CCC	Review amended assignment and overnight e-mail exchanges (.40); further e-mails with Committee and Glass re status of joint report (.10); e-mails with client re status (.10); review redlines from Committee (.20); prepare further redlines of report and prepare e-mail to Committee (.80); review and comment on consent letter (.20); circulate drafts to client and Glass (.10).	1.90
07-16-25	CCC	E-mails with Committee re call with buyer counsel re letter (.40); further revisions to statement (.60); e-mails with Committee and CNMI counsel re form of joint report (.30).	1.30

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07-18-25			
CCC	Call from buyer counsel re meeting.	0.10	
07-21-25			
CCC	Call with buyer re status (.90); call to client re same (.20); e-mails with Committee re same and strategy (.30).	1.40	
AAI	Video conference with CCC, Yanza, and Team King re transaction status.	0.90	
07-22-25			
CCC	Texts and e-mails with counsel re DPL letter and further calls (.20); call from Committee counsel re same (.40).	0.60	
AAI	Video conference with CCC and client re transaction (.90); read numerous e-mails from CCC and Yanza regarding DPL letter (.10).	1.00	
07-23-25			
CCC	Review files and prepare for status conference and short call with Committee counsel (.80); participate in status conference (.60); prepare e-mail to counsel for DPL re assignment and follow up e-mails re same (.20); prepare e-mail re update (.40); e-mails re status of DPL negotiations (.10).	2.10	
AAI	Finalize supplement to joint status report for electronic submission (.30); read hearing minutes and CCC summary re same (.10); read numerous e-mails from CCC, Yanza and Glass regarding DPL consent to lease assignment (.10).	0.50	
07-24-25			
CCC	Call with UST re status; e-mails with Committee and Yanza re assignment and consent; review OSC and send.	0.30	
07-25-25			
CCC	Review revised and signed assignment, and e-mails re closing and funding (.20); e-mails with counsel and UST re same (.20).	0.40	
08-01-25			
CCC	Call with counsel re status and fees.	0.10	
08-04-25			
CCC	Call with Chi re status of funding (.10); zoom call with clients re same and closing issues (.40); prepare e-mail to Yanza re same (.30).	0.80	
08-05-25			
CCC	Call with Sit counsel re update on closing.	0.10	

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CCC	Review executed assignment and e-mails (.10); prepare e-mail to escrow re update (.30).	0.40
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AAI	Read e-mails from CCC, escrow and buyer's counsel re escrow status.	0.10
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08-08-25

CCC	Confer with AAI re deadlines and review minutes (.10); prepare e-mail to group re deadline (.20).	0.30
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08-09-25

CCC	Review follow up e-mails from Halegua and Seman and respond.	0.10
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08-10-25

CCC	Review minutes and prepare status report (1.00); call with team re status of funding and delay (.50); follow up with escrow (.10).	1.60
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AAI	Finalize status report for electronic submission.	0.40
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08-12-25

CCC	Review recorded assignment and related e-mail re assignment fee and circulate (.20); respond to Committee inquiry (.10).	0.30
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08-13-25

CCC	Review Committee e-mail and proposed report.	0.10
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08-14-25

CCC	Call with Yanza re IPP (.20); review files and locate prior redlined document and prepare e-mail to Yanza (.40); calls with client re status and banking issues (.60); e-mails and call with escrow re funds (.20); prepare response to OSC (2.00).	3.40
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AAI	Partial call with CCC and Yanza re closing (.20); review client file and e-mail Yanza re leasehold documents (.10); read e-mail from Yanza re IPP (.10).	0.70
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AAI	Video conference with CCC and client re closing status (.40); read e-mails from Yanza and Chi re IPP (.10); prepare assignment of interest in IPP (.60).	1.10
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CCC	E-mails with buyer counsel and client re delays (.20); conference call with team re closing issues (.70); respond to client e-mail re	1.20
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Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06  
INVOICE NO: 25319

	additional information and funding (.20); review assignment form and forward to counsel (.10).	
08-16-25		
CCC	Review and organize IPP documents and prepare e-mail to Yanza.	0.90
AAI	Review IPP corporate documents and revise assignment of membership interest instrument.	0.20
08-19-25		
CCC	E-mails with Yanza re additional documents and call to Yanza re same (.30); calls with client re status of funding and closing issues (.50); work on closing (2.20).	3.00
AAI	Work on transaction closing (1.70); e-mail Yanza with closing docs (.10); review client file re IPP (.20); read e-mails from escrow confirming payment (.10).	2.10
08-20-25		
CCC	Review overnight escrow e-mails and circulate to group and prepare e-mail re continuance (.50); call with Committee counsel re hearing and plan (.10); prepare for and participate in hearing (.50); review multiple e-mails re post-closing issues (.20).	1.30
08-24-25		
CCC	Review and respond to e-mails re post-closing issues.	0.20
08-25-25		
CCC	Review e-mails re charges asserted by CNMI against buyer and service issues.	0.20
08-27-25		
CCC	Respond to various e-mails re post-closing issues.	0.20
08-29-25		
CCC	Review form of liquidating plan and trust agreement (.20); call with Committee re plan issues (.40).	0.60
AAI	Video conference with CCC and Committee Counsel re liquidating plan.	0.30
08-30-25		
CCC	Prepare detailed response to HK counsel re sale and assets (1.20); prepare e-mail to client re same (.10).	1.30

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09 -30-25Imperial Pacific International (CNMI) LLC  
Asset Disposition, Plan and Disclosure StatementACCOUNT NO: 1815-06  
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CCC	Respond to e-mail from client re liquidating trustee.	0.10	
09-04-25			
CCC	Review files for admin claims (.10); call with client re plan issues and casino license (1.00).	1.10	
AAI	Video conference with CCC and client re closing and post-closing matters.	1.00	
09-08-25			
CCC	E-mail exchange with TK counsel re CCC demand issue.	0.10	
09-15-25			
CCC	Prepare for call and call with client re status of liquidation and issues raised by Yanza e-mail.	0.70	
AAI	Video conference with CCC and client re case status (.70); work on chart of claims (.40).	1.10	
SUB TOTAL		292.10	\$119,535.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	212.70	\$450.00	\$95,715.00
Allison A. Ito	79.40	\$300.00	\$23,820.00
STATE TAX			<u>5,632.49</u>
TOTAL FEES			\$125,167.49
TOTAL EXPENSES			<u>\$0.00</u>
TOTAL CURRENT WORK			<b>\$125,167.49</b>



Chuck C. Choi  
Allison A. Ito

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700 Bishop Street  
Suite 1107  
Honolulu, Hawaii 96813

## CHOI & ITO

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ATTORNEYS AT LAW

Phone: (808) 533-1877  
Fax: (808) 566-6900  
E-mail: hibklaw@hibklaw.com

Imperial Pacific International (CNMI) LLC

September 30, 2025

ACCOUNT NO: 1815-07

INVOICE NO: 25320

RESPONSIBLE ATTY: CCC

RE:	Litigation	HOURS
11-07-24		
AAI	Research regarding whether arbitration clause is enforceable in bankruptcy (.60); read e-mails from Intrepid and Chi regarding projections (.10).	0.70
11-09-24		
AAI	Analyze Ackerman case regarding denial of enforcement of mandatory arbitration clause in bankruptcy (.30); analyze Cingular Wireless regarding treatment of mandatory arbitration clause in bankruptcy and distinguish from Ackerman case (.40).	0.70
11-10-24		
CCC	E-mail client information requested.	0.10
11-26-24		
CCC	E-mails with Intrepid re sale of gambling debts (.10); e-mails with Chi re same and tax lien issues (.10); call with Halegua re status of sale and litigation (.50); call with client re same (1.00).	1.70
01-17-25		
AAI	Read e-mails from CCC and Chen regarding stipulation to adjourn 9th circuit proceedings.	0.20
01-22-25		
AAI	Read litigation / case status update from KCL.	0.10
02-17-25		
CCC	Review HK e-mail re litigation status.	0.20
AAI	Read reply from HK attorney.	0.10

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Litigation

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09 -30-25

ACCOUNT NO: 1815-07  
INVOICE NO: 25320

03-19-25			
AAI	Read e-mail inquiry from Chung (.10).	0.10	
03-31-25			
AAI	Read update from Yam regarding HK litigation status.	0.10	
04-10-25			
CCC	Review letter from KCL re litigation.	0.10	
04-29-25			
AAI	Read e-mail from Yam regarding expert witness fee and Hong Kong Trial-related matters.	0.10	
04-30-25			
AAI	Read correspondence from HK attorney regarding expert witness retention matters in HK proceeding.	0.10	
05-01-25			
CCC	Review proposed dismissal stipulation and e-mails with Chen and call with Halegua.	0.20	
AAI	Read e-mails from Chen regarding mechanics for dismissing appeals (.10); confer with CCC re considerations if appeal dismissed with prejudice before sale closes (.10).	0.20	
05-13-25			
CCC	Review e-mails re dismissals of appeal and respond.	0.10	
06-06-25			
AAI	Read e-mail string concerning stipulation in 9th Circuit proceeding.	0.10	
	SUB TOTAL	4.90	\$1,830.00
FEE SUMMARY:			
ATTORNEY	HOURS	RATE	TOTAL
Chuck C. Choi	2.40	\$450.00	\$1,080.00
Allison A. Ito	2.50	\$300.00	\$750.00
	STATE TAX		<u>86.23</u>
	TOTAL FEES		\$1,916.23

**CHOI & ITO**

Imperial Pacific International (CNMI) LLC  
Litigation

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09 -30-25  
ACCOUNT NO: 1815-07  
INVOICE NO: 25320

TOTAL EXPENSES	<u>\$0.00</u>
 TOTAL CURRENT WORK	 \$1,916.23

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORHERN MARIANA ISLANDS  
BANKRUPTCY DIVISION

In re

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,

Debtor.

Case No. 1:24-BK-00002

**DECLARATION OF CHUCK C.  
CHOI**

DECLARATION OF CHUCK C. CHOI

I, Chuck C. Choi, hereby declare under penalty of perjury that:

1. I am a partner at Choi & Ito (“Applicant”). I am competent to make this declaration and do so based on personal knowledge. I make this declaration in support of the *Second Interim Fee Application of Choi & Ito, As Debtor’s General Bankruptcy Co-Counsel, for the Period November 1, 2024 to September 30, 2025* (the “Application”).

2. I have read the foregoing Application, and the contents thereof are true and accurate to the best of my knowledge, information, and belief.

3. No agreement or understanding exists between Applicant and any other person or firm for a division of the compensation requested herein.

4. The rates charged by Applicant are the same as are charged to non-bankruptcy clients by Applicant and are consistent with the rates approved by other Bankruptcy Courts in cases that were pending during the periods for which compensation is requested.

5. To the best of my knowledge, information and belief, the application conforms to the U.S. Trustee’s Guidelines, LBR 2016-1, and any order of the Court.

/s/ Chuck C. Choi  
Chuck C. Choi

Filer's Name, Address, Phone, Fax, Email:

CHOI & ITO, Attorneys at Law  
 Chuck C. Choi; Allison A. Ito  
 700 Bishop Street, Suite 1107  
 Honolulu, Hawaii 96813  
 Tel: (808) 533-1877; Fax: (808) 566-6900  
 Email: cchoi@hibklaw.com; aito@hibklaw.com



UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF HAWAII  
 1132 Bishop Street, Suite 250  
 Honolulu, Hawaii 96813

hib\_2016-1a (12/09)

<b>Debtor:</b> IMPERIAL PACIFIC INTERNATIONAL (CNMI), INC.			<b>Case No.:</b> 24-00002		
<b>Joint Debtor:</b> (if any)			<b>Chapter:</b> 11		
<b>COMPENSATION SUMMARY SHEET</b>		<input checked="" type="checkbox"/> <b>Interim</b> <input type="checkbox"/> <b>Final</b>	<b>2nd</b> <small>(1<sup>st</sup>, 2<sup>nd</sup>, etc.)</small>	<b>Related Docket No.:</b> (if application filed separately)	
<b>Applicant:</b>	Choi & Ito, Attorneys at Law				
<b>Capacity:</b>	Bankruptcy Counsel for Debtor				
<b>Date of order authorizing employment:</b>			June 28, 2024 (effective as of April 19, 2024)		
<b>Period for this request (e.g. 1/1/09 -12/31/09):</b>			11/01/2024 - 09/30/2025		
<b>Amount rec'd prepetition:</b>	\$ 61,407.30	<b>Client trust acct balance:</b>	\$ 45,604.34		
<b>Previous amounts awarded by court:</b>		<b>Fees:</b> \$ 248,492.06	<b>Expenses:</b> \$ 2,182.93		
<b>Previous amounts received:</b>		<b>Fees:</b> \$ 218,563.27	<b>Expenses:</b> \$ 2,182.93		
<b>Amount of this request (inclusive of any excise taxes):</b>		<b>Fees:</b> \$ 179,261.70	<b>Expenses:</b> \$ 822.45		
Availability of funds – Applicant believes that there are sufficient funds to pay this request and all other accrued and anticipated administrative expenses:			<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>		
<b>Name of Professional</b>	<b>Position</b>	<b>Hourly rate</b>	<b>Hours</b>	<b>Fees</b>	
Chuck C. Choi, Esq.	Partner	\$450.00	286.90	\$129,105.00	
Allison A. Ito, Esq.	Partner	\$300.00	140.30	\$42,090.00	
<b>TOTAL</b>			427.20	\$117,195.00	
[Attach additional sheets as needed.]					
Dated: <u>October 30, 2025</u>		/s/ <u>Chuck C. Choi</u>			
		Applicant		Print name if original signature	