

OFFICE OF THE UNITED STATES TRUSTEE

TIFFANY L. CARROLL

Acting United States Trustee

CURTIS CHING 3931

Assistant United States Trustee

ELVINA ROFAEL (CA SBA 333919)

Trial Attorney

300 Ala Moana Boulevard, Room 4108

Honolulu, Hawaii 96850

Telephone: (808) 522-8155

Email: ustpreion15.hi.ecf@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION**

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor and
Debtor-in-Possession.

Case No. 24-00002
(Chapter 11)

Judge: Hon. Robert J. Faris

**UNITED STATES TRUSTEE'S NOTICE OF VOLUNTARY REDUCTION
IN FEES WITH RESPECT TO SECOND INTERIM FEE APPLICATION
OF ARENTFOX SCHIFF LLP (DKT. NO. 485)**

Tiffany L. Carroll, Acting United States Trustee for Region 15 ("United States Trustee"), by and through her undersigned counsel, hereby files this Notice of Voluntary Reduction in Fees with Respect to ArentFox Schiff LLP's Second Interim Fee Application (the "Applicant" and "Application"), filed in the above-captioned case.

In support, the United States Trustee respectfully represents as follows:

1. The fee applicant bears the burden of proof to show entitlement to the



1 requested fees under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th
2 Cir. 2003), *rev'd in part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji*
3 *Corp.*, 117 B.R. 983, 990 (Bankr. D. Nev. 1990) (“[t]he applicant ... has the burden of
4 proof to show the reasonableness of the fees sought”).

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6 2. Interim fee awards are always subject to reexamination during a bankruptcy
7 case. *See In re Strand*, 375 F.3d 854, 858 (9th Cir. 2004).

8
9 3. The United States Trustee has reached an agreement with the Applicant to
10 resolve the United States Trustee’s informal opposition to the Application.

11 4. Applicant has consented to a voluntary reduction of \$5,362.50 in legal fees
12 to address, in the United States Trustee’s view, transitory timekeeping,
13 administrative/overhead tasks, vague entries, block billing, and excessive hearing
14 attendance.

15
16 5. After accounting for Applicant’s voluntary reduction, the Application now
17 requests a total of \$420,798 in legal fees and reimbursement of expenses in the amount of
18 \$1,185.304. *See* Dkt. No. 485.

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20 DATE: San Diego, California, November 18, 2025.

21 Tiffany L. Carroll
22 Acting United States Trustee

23 By /s/ ELVINA ROFAEL
24 Trial Attorney