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10 Attorneys for the Official Committee  
11 of General Unsecured Creditors

12 **IN THE UNITED STATES DISTRICT COURT**

13 **FOR THE NORTHERN MARIANA ISLANDS**

14 **BANKRUPTCY DIVISION**



1 In re:

2 **IMPERIAL PACIFIC**  
3 **INTERNATIONAL (CNMI) LLC,**

4 Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**DECLARATION OF MICHAEL E.  
SALZMAN IN SUPPORT OF:**

**SECOND INTERIM FEE APPLICATION  
OF CHAMBERS LAW LLC, LOCAL  
COUNSEL TO THE OFFICIAL  
COMMITTEE OF GENERAL  
UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM OCTOBER 1,  
2024 THROUGH SEPTEMBER 30, 2025**

Hearing Date, Time and Location (ChST):

Date: December 5, 2025

Time: 9:00 a.m.

Location: 3rd Floor Courtroom 1671  
Gualo Rai Rd., Gualo Rai  
Saipan, MP 96950

Judge: Hon. Robert J. Faris

14 **DECLARATION OF MICHAEL E. SALZMAN**

15 I, Michael E. Salzman, under penalty of perjury, declare as follows:

16 1. I am an individual over the age of twenty-one (21), an attorney admitted to practice  
17 in New York, and the general counsel of Hughes Hubbard & Reed LLP (“Hughes Hubbard”), which  
18 is a duly appointed member and Chair of the Official Committee of Unsecured Creditors in the  
19 Imperial Pacific International (CNMI), LLC bankruptcy case (the “Committee”). I submit this  
20 declaration (the “Declaration”) in support of the *Second Interim Fee Application of Chambers Law*  
21 *LLC, Local Counsel to the Official Committee of General Unsecured Creditors, for Allowance of*  
22 *Compensation and Reimbursement of Expenses for the Period from October 1, 2024 through*  
23 *September 30, 2025* (the “Application”). All capitalized terms used herein shall have the meanings  
24 ascribed to them in the Application, unless otherwise defined.

25 2. The facts set forth in this Declaration are based upon Hughes Hubbard’s extensive  
26 knowledge of bankruptcy proceedings, my and other attorneys at Hughes Hubbard’s review of the  
27 relevant documents, information provided to me or verified by Chambers Law LLC, and the  
28

1 personal opinions of me and other attorneys at Hughes Hubbard based upon our experience,  
2 knowledge, and information provided to us. I am authorized to submit this Declaration on behalf  
3 of Hughes Hubbard as Chair of the Committee, and, if called upon to testify, I would testify  
4 competently to the facts set forth herein.

5 3. On or about May 14, 2024, the Office of the United States Trustee formed the  
6 Committee. On or about May 21, 2024, the Committee retained Chambers Law LLC (the "Firm")  
7 to represent the Committee as local counsel.

8 4. During the Fee Period, the Firm provided services to the Committee. As Committee  
9 Chair, Hughes Hubbard is satisfied with the services that the Firm has provided, and believes that  
10 the Firm has assisted the Committee and the estate with respect to this case.

11 5. In its capacity as Chair of the Committee, Hughes Hubbard reviewed the  
12 Application and the related billing statements for payment of fees and reimbursement of expenses  
13 for the Firm, and has no objection to the fees and expenses requested in the Application. Therefore,  
14 Hughes Hubbard, in its capacity as Chair of the Committee, supports interim allowance and  
15 payment of the amounts set forth in the Application.

16 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
17 and correct.

18 Executed this 21st day of November 2025, at New York, New York.

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21   
22 MICHAEL E. SALZMAN  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2025, I caused the forgoing document to be filed with the Clerk of Court for the United States District Court for the Northern Mariana Islands, Bankruptcy Division, using the CM/ECF System. A true and correct copy of the said pleading has been served on all counsel of record via the Court's CM/ECF System.

Executed this 21th day of November, 2025.

/s/ Christopher K. S. Wong  
CHRISTOPHER K. S. WONG