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

In re:

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

Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**STIPULATION TO CONTINUE HEARING ON  
 FIRST AND FINAL FEE APPLICATION OF  
 INTREPID INVESTMENT BANKERS LLC,  
 INVESTMENT BANKER 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;**

[Relates to Docket Nos. 483, 500, 503, 504, 509 and  
 512]

Current 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

Requested Hearing Date, Time and Location (ChST):

Date: December 16, 2025

Time: 9:00 a.m.

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

Judge: Hon. Robert J. Faris



Intrepid Investment Bankers, LLC (“**Intrepid**”), investment banker to the Official Committee of Unsecured Creditors in the above-captioned case, and the Office of the United States Trustee (the “**UST**”, and together with Intrepid, the “**Parties**”), hereby submit the following stipulation:

A. On October 31, 2025, Intrepid filed its First and Final Fee Application for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2024 through September 30, 2025 (the “**Fee Application**”) [Docket No. 483].

B. On November 19, 2025, the UST filed an objection to the Fee Application (the “**Objection**”) [Docket No. 500] , along with a supporting declaration filed by counsel for Imperial Pacific International (CNMI) LLC (the “**Debtor**”) [Docket No. 504].

C. On November 19, 2025 and December 1, 2025, respectively, joinders to the Objection were filed by stalking horse bidder and lender for the Debtor, Loi Lam Sit [Docket No. 503] and creditors Joshua Gray, U.S.A. Fanter, Michael Dotts, and the Commonwealth of the Northern Mariana Island [Docket No. 512].

D. On November 25, 2025, Intrepid filed its reply to the Objection [Docket No. 509].

E. The hearing to consider the Fee Application is currently set for December 5, 2025 at 9:00 a.m.

F. The Parties are working to resolve this matter and request additional time to negotiate the issues at hand.

G. A hearing to consider the motion to approve the disclosure statement (the “**Disclosure Statement**”) [Docket No. 497] is currently scheduled for December 16, 2025 at 9:00 a.m.

H. The Parties agree that, in the interest of judicial economy, the hearing on the Fee Application should be continued to the same date and time as the hearing on the Disclosure Statement.

NOW, THEREFORE, the Parties stipulate and jointly agree as follows:

1           1.       The December 5, 2025 hearing on the Fee Application shall be continued to  
2 December 16, 2025 at 9:00 a.m.

3           IT IS SO STIPULATED.

4 Dated: December 1, 2025

PACHULSKI STANG ZIEHL & JONES LLP

6 By: /s/ Jeffrey W. Dulberg

7 Jeffrey N. Pomerantz

8 Jeffrey W. Dulberg

9 Attorneys for Intrepid Investment Bankers, LLC

10 Dated: December 1, 2025

TIFFANY L. CARROLL Acting United States  
Trustee

12 By: /s/ Curtis Ching

13 Curtis Ching

14 Assistant United States Trustee