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

In re) Case No. 1:24-bk-00002
) (Chapter 11)
IMPERIAL PACIFIC INTERNATIONAL)
(CNMI), LLC,) JOINDER IN JOSHUA GRAY'S LIMITED
) OPPOSITION TO AND UNITED STATES
Debtor and) TRUSTEE'S STATEMENT REGARDING
Debtor-in-Possession) JOINT MOTION FOR ORDER
) APPROVING DISCLOSURE STATEMENT
) FOR JOINT CHAPTER 11 PLAN OF
) LIQUIDATION
)
)
)

NOW COME Judgment Creditor Plaintiffs in *Ozcan Genc et al. v. Imperial Pacific International (CNMI), LLC*, Case No. 1:20-cv-00031 (D. N. Mar. I.) and Non-judgment Creditors Plaintiffs in *Ozcan Genc et al. v. Imperial Pacific International (CNMI), LLC*, Case No. 1:22-cv-00002 (D. N. Mar. I.), and Juan T. Lizama, dba Law Office of Juan T. Lizama, by and through counsel, and hereby join in the arguments advanced and relief sought by Judgment Creditor Joshua Gray in his Limited Opposition to Joint Motion For Order Approving Disclosure Statement for Joint Chapter 11 Plan of Liquidation Dated October 31, 2025 by Debtor and Official Committee of General Unsecured Creditors, and Balloting Procedures and Scheduling Deadlines (ECF No. 522, filed Dec. 9, 2025) and (2) the United States Trustee in United States Trustee's Statement Regarding Joint Motion (ECF No. 523, filed Dec.9, 2025).



1 Respectfully submitted on December 14, 2025

2 BANES HOREY NIE & MILLER, LLC
3 *Attorneys for Judgment Creditor Genc Plaintiffs,*
4 *Non-judgment Creditor Genc Plaintiffs, and*
5 *Non-judgment Creditor Juan T. Lizama*

6 /s/
by Richard C. Miller, F0458