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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**

15 In re:
16 **IMPERIAL PACIFIC INTERNATIONAL**
17 **(CNMI) LLC,**
18 Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**THE OFFICIAL COMMITTEE OF
GENERAL UNSECURED
CREDITORS' FIRST OMNIBUS
OBJECTION TO CERTAIN (I)
INSUFFICIENT DOCUMENTATION
CLAIMS, (II) DUPLICATE CLAIMS,
AND (III) AMENDED & SUPERSEDED
CLAIMS; DECLARATION OF
CHRISTOPHER K.S. WONG IN
SUPPORT THEREOF**

Hearing Date, Time and Location (ChST):

Date: To Be Determined
Time: To Be Determined
Location: 3rd Floor Courtroom
1671 Gualo Rai Rd., Gualo Rai
Saipan, MP 96950

Judge: Hon. Robert J. Faris

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1 disbursement of payments, the remaining sale proceeds total approximately \$6,441,436.25.

2 On October 31, 2025, the Debtor and the Committee filed the *Disclosure Statement*
3 *Describing Joint Chapter 11 Plan of Liquidation, Dated October 31, 2025 by Debtor and Official*
4 *Committee of General Unsecured Creditors* (the “Disclosure Statement”) and the *Joint Chapter 11*
5 *Plan of Liquidation, Dated October 31, 2025 by Debtor and Official Committee Of General*
6 *Unsecured Creditors* (the “Plan”). See ECF Nos. 489 and 490. Following hearings on the
7 Disclosure Statement, the Debtor and the Committee carefully evaluated the available options,
8 including the associated risks, costs and hurdles with each of chapter 11 plan confirmation,
9 conversion to a chapter 7 case, and structured dismissal, and jointly determined that a structured
10 dismissal is in the best interest of creditors. The resolution of such claim objections is essential for
11 the anticipated structured dismissal and an orderly and efficient distribution to creditors.

12 **B. Claims Process**

13 On May 7, 2024, the Debtor duly served a *Notice of Chapter 11 Bankruptcy Case to*
14 *Creditors, Form 309F1* (Docket No. 34) to all known creditors and parties in interest as sworn to
15 in the Certificate of Service of Jennifer B. Reynoso, dated May 8, 2024. See Docket No. 46. The
16 initial deadline for creditors to file a proof of claim is August 27, 2024 (the “Claims Bar Date”).
17 See Docket No. 34. On August 19, 2024, the Court entered an order partially granting a *Joint*
18 *Motion of Debtor and the Official Committee of General Unsecured Creditors for Order (1)*
19 *Extending Claims Bar Date; (2) Approving Proof of Claim Form; and (3) Approving Form and*
20 *Manner of Notice* (Docket No 181) filed by the Debtor and the Committee and extending the Claims
21 Bar Date to October 31, 2024 at 11:59 p.m. (ChST). See Docket No. 198. On October 8, 2024, the
22 Court entered an order further extending the Claims Bar Date to December 2, 2024, at 11:59 p.m.
23 (ChST) and approved the Proof of Claim Form and Bar Date Notice proposed by the Debtor and
24 the Committee. See Docket No. 277.

25 The claims register (the “Claims Register”) prepared and maintained by Verita Global, the
26 Debtor’s court appointed claims and noticing agent, shows that approximately 155 proofs of claim
27 have been filed in the Case. Since the Claims Bar Date, the Committee, with the assistance of their
28 advisors and professionals, have been actively analyzing and reconciling proofs of claim filed in

1 the Case to determine which proofs of claim should be disallowed, reduced and/or reclassified.
2 While this analysis and reconciliation is ongoing, the Committee has determined, based on a review
3 of the Schedules and Statements and the documentation (or lack thereof) provided with each
4 Disputed Claim, that the Disputed Claims should be disallowed, expunged, and/or otherwise
5 modified as follows:

- 6
- 7 i. *Insufficient Documentation Claims.* The Insufficient Documentation Claims listed on Schedule 1 should be disallowed and expunged because such claims provide insufficient substantiation for the asserted claims filed against the Debtor.
- 8
- 9 ii. *Duplicate Claims.* The Duplicate Claims listed on Schedule 2 should be disallowed and expunged because such claims are duplicative of another claim filed against the Debtor on the same basis and by the same claimant.
- 10
- 11 iii. *Amended & Superseded Claims.* The Amended & Superseded Claims listed on Schedule 3 should be disallowed and expunged because such claims have been amended and superseded by a subsequently filed proof of claim by the same claimant on account of the same liability.
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14 II.

15 **BASIS FOR RELIEF REQUESTED**

16 Section 502(a) of the Bankruptcy Code provides, in pertinent part, that “[a] claim or interest,
17 proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest
18 . . . objects.” 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and
19 hearing, shall determine the allowed amount of the claim. 11 U.S.C. § 502(b). A claim may not be
20 allowed to the extent that it “is unenforceable against the debtor and property of the debtor, under
21 any agreement or applicable law for a reason other than because such claim is contingent or
22 unmatured.” 11 U.S.C. § 502(b)(1).

23 Although Rule 3001(f) provides that “[a] proof of claim executed and filed in accordance
24 with these rules shall constitute prima facie evidence of the validity and amount of the claim,” this
25 presumption of a claim’s validity does not arise if the claim itself does not set forth the necessary
26 facts to establish the claim. See *Wright v. Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991);
27 *Ashford v. Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*, 178 B.R. 222,
28 226 (9th Cir. B.A.P. 1995). The Ninth Circuit sets forth the ultimate burden of persuasion is always

1 on the claimant. *See In re Holm*, 931 F.2d at 623. In *Consolidated Pioneer Mortgage*, the
2 Bankruptcy Appellate Panel of the Ninth Circuit stated as follows:

3 The burden of proof for claims brought in the bankruptcy court
4 under 11 U.S.C.A. § 502(a) rests on different parties at different
5 times. ***Initially, the claimant must allege facts sufficient to support***
6 ***the claim.*** If the averments in his filed claim meet this standard of
7 sufficiency, it is “*prima facie*” valid. In other words, a claim that
8 alleges facts sufficient to support a legal liability to the claimant
9 satisfies the claimant’s initial obligation to go forward. The burden
10 of going forward then shifts to the objector to produce evidence
11 sufficient to negate the *prima facie* validity of the filed claim. It is
12 often said that the objector must produce evidence equal in force to
13 the *prima facie* case. In practice, the objector must produce evidence
14 which, if believed, would refute at least one of the allegations that is
15 essential to the claim's legal sufficiency. If the objector produces
16 sufficient evidence to negate one or more of the sworn facts in the
17 proof of claim, the burden reverts to the claimant to prove the validity
18 of the claim by a preponderance of the evidence. ***The burden of***
19 ***persuasion is always on the claimant.***

20 *In re Consolidated Pioneer Mortgage*, 178 B.R. at 226.

21 The filing of an objection to a proof of claim “creates a dispute which is a contested matter”
22 within the meaning of Bankruptcy Rule 9014 and must be resolved after notice and opportunity for
23 hearing upon a motion for relief. *See* Adv. Comm. Notes to Fed. R. Bankr. P. 9014. Upon
24 objection, the proof of claim provides “some evidence as to its validity and amount” and is “strong
25 enough to carry over a mere formal objection without more.” *Wright v. Holm (In re Holm)*, 931
26 F.2d 620, 623 (9th Cir.1991) (quoting 3 Collier on Bankruptcy § 502.02, at 502-22 (15th ed.1991));
27 *see also Ashford v. Consolidated Pioneer Mort. (In re Consol. Pioneer Mort.)*, 178 B.R. 222, 226
28 (9th Cir. BAP 1995), *aff’d*, 91 F.3d 151, 1996 WL 393533 (9th Cir.1996). Under *In re Campbell*,
336 B.R. 430 (B.A.P. 9th Cir. 2005), any objection that raises a legal or factual ground to disallow
the claim will likely prevail over a proof of claim lacking prima facie validity.

Moreover, a claimant is not entitled to multiple recoveries for a single liability against a
single debtor since a claimant is entitled only to a single satisfaction, if at all, of any particular claim
of liability against a debtor. *See In re Handy Andy Home Improvement Ctrs., Inc.*, 222 B.R. 571,
575 (Bankr. N.D. Ill. 1998) (“[I]t is axiomatic that one cannot recover for the same debt twice.”).

1 Accordingly, to avoid the possibility of an improper recovery against the Debtor’s estate and for
2 the benefit of the creditors of the Debtor with valid claims, the Committee submits that the Disputed
3 Claims should be disallowed, expunged, and/or otherwise modified for the reasons set forth herein.

4 **III.**

5 **ARGUMENT**

6 **A. The Insufficient Documentation Claims.**

7 As set forth in the Wong Declaration, based upon a careful review and analysis of the
8 Schedules and Statements, and the Insufficient Documentation Claims (including the related
9 supporting documentation—or lack thereof— attached thereto), the Committee has determined that
10 each Insufficient Documentation Claim lacks any documentation supporting the existence and/or
11 amount of the underlying claims.

12 As noted above, under the burden-shifting framework articulated in *In re Consolidated*
13 *Pioneer Mortgage*, a claimant must initially “allege facts sufficient to support the claim” before the
14 claim is entitled to prima facie validity. 178 B.R. at 226. As such, before a proof of claim is entitled
15 to a presumption of validity, any claimant in the Case must “allege facts sufficient to support the
16 claim.” Based on the review of the Insufficient Documentation Claims, each Insufficient
17 Documentation Claims fails to allege sufficient facts or conduct against the Debtor entity against
18 which it was filed to substantiate such claim. Therefore, the Insufficient Documentation Claims
19 fail to meet the threshold burden of proof and are not prima facie valid. *See In re Consolidated*
20 *Pioneer Mortgage*, 178 B.R. at 226. As a result, the Insufficient Documentation Claims should be
21 disallowed.

22 Failure to disallow the Insufficient Documentation Claims will result in the applicable
23 claimants receiving unwarranted recoveries to the detriment of other creditors. Therefore, the
24 Committee (i) objects to the allowance of the Insufficient Documentation Claims set forth on
25 Schedule 1, and (ii) requests entry of an order disallowing and expunging the Insufficient
26 Documentation Claims and providing that any further claims filed by the Claimants, including any
27 amendments of these claims, will be deemed disallowed without further Court order.

1 **B. The Duplicate Claims**

2 As set forth in the Wong Declaration, based upon a careful review and analysis of the
3 Duplicate Claims listed on Schedule 2, the Schedules and Statements, and the Claims Register, the
4 Committee has determined that each Duplicate Claim was filed against the Debtor on the same
5 basis and by the same claimant as its corresponding “Remaining Claim” (the “Duplicate Remaining
6 Claims”) listed on Schedule 2. Failure to expunge and disallow the Duplicate Claims will result in
7 claims that have been improperly asserted against the Debtor remaining on the Claims Register.
8 Accordingly, to avoid the possibility of multiple recoveries and to maintain an accurate Claims
9 Register, the Committee submits that the Duplicate Claims should be disallowed and expunged
10 from the Claims Register.

11 The estate should not be required to pay twice on the same obligation. *See In re Handy*
12 *Andy Home Improvement Ctrs., Inc.*, 222 B.R. at 575 (“[I]t is axiomatic that one cannot recover for
13 the same debt twice.”). Moreover, disallowance of these redundant claims will enable the Claims
14 Register to reflect more accurately the claims asserted against the Debtor. Further, any
15 disallowance or expungement of the Duplicate Claims will not prejudice the relevant claimants or
16 their substantive rights against the Debtor because each Duplicate Remaining Claim will remain on
17 the Claims Register, subject to the ongoing right to object to the Duplicate Remaining Claims on
18 any applicable grounds in any subsequent claim objection.

19 Therefore, the Committee (i) objects to the Duplicate Claims listed on Schedule 2 and (ii)
20 requests entry of an order disallowing and expunging such Duplicate Claims under the column
21 heading “Duplicate Claim to be Disallowed” in their entirety¹ and providing that any further claims
22 filed by the Claimants, including any amendments of these claims, will be deemed disallowed
23 without further Court order.

24 **C. The Amended & Superseded Claims**

25 As set forth in the Wong Declaration, based upon a careful review and analysis of the
26 Amended & Superseded Claims listed on Schedule 3, the Committee has determined that each
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28 ¹ For the avoidance of doubt, the Committee reserves all rights to object to the Remaining Claims
on any grounds permitted under applicable law.

1 Amended & Superseded Claim listed under the column “Amended Claim to be Disallowed” has
2 been amended and superseded by a subsequently filed proof of claim by the same claimant and on
3 account of the same liability as those listed in the column labeled “Remaining Claim” (the
4 “Amended and Superseded Remaining Claims”).

5 The relief requested in this Objection is necessary to prevent the allowance of the Amended
6 & Superseded Claims, which by their nature have been superseded and remain on the Claims
7 Register only as a technicality. The Debtor should not be required to pay twice on the same
8 obligation. *See In re Handy Andy Home Improvement Ctrs., Inc.*, 222 B.R. at 575 (“[I]t is axiomatic
9 that one cannot recover for the same debt twice.”). Moreover, disallowance of the Amended &
10 Superseded Claims will enable the Debtor to maintain a Claims Register that more accurately
11 reflects the claims that have been asserted. Further, the claimants holding Amended & Superseded
12 Claims will not be prejudiced by having their respective Amended & Superseded Claims
13 disallowed and expunged because each Amended and Superseded Remaining Claim will remain
14 on the Claims Register, subject to the ongoing right to object to the Amended and Superseded
15 Remaining Claims on any applicable grounds in any subsequent claim objection.

16 Therefore, the Committee (i) objects to the allowance of the Amended & Superseded Claims
17 set forth on Schedule 3 and (ii) requests entry of an order disallowing and expunging such Amended
18 & Superseded Claims listed under the column heading “Amended Claim to be Disallowed” in their
19 entirety² and providing that any further claims filed by the Claimants, including any amendments
20 of these claims, will be deemed disallowed without further Court order.

21 IV.

22 **RESERVATION OF RIGHTS**

23 The Committee expressly reserves the right to amend, modify, or supplement this
24 Objection, and to file additional objections to any other claims (filed or not) that may be asserted
25 against the Debtor and its estate. Should one or more of the grounds of objection stated in this
26 Objection be dismissed or overruled, the Committee reserves the right to object to each of the
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28 ² For the avoidance of doubt, the Committee reserves all rights to object to the Remaining Claims
on any grounds permitted under applicable law.

1 Disputed Claims or any other proofs of claim on any other grounds that the Committee discovers
2 or elects to pursue. Nothing in this Objection shall be deemed or construed as: (a) an admission as
3 to the amount of, basis for, or validity of any claim against the Debtor under the Bankruptcy Code
4 or other applicable nonbankruptcy law; (b) a waiver of the Committee's or any other party in
5 interest's right to dispute or otherwise object to any claim or proof of interest on any grounds or
6 basis; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that
7 any particular claim is of a type specified or defined in this Objection; (e) an admission as to the
8 validity, priority, enforceability, or perfection of any lien on, security interest in, or other
9 encumbrance on property of the Debtor's estate; or (f) a waiver of any of the Committee's rights,
10 claims, defenses, counterclaims or causes of action which may exist against any entity under the
11 Bankruptcy Code or any other applicable law.

12 **V.**

13 **NOTICE**

14 The Committee will provide notice of this Objection to the following parties, or in lieu
15 thereof, their counsel: (a) the U.S. Trustee; (b) counsel to the Debtor; (c) each of the claimants
16 whose Disputed Claim is subject to this Objection; and (d) any party that has requested notice
17 pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the
18 Committee submits that no other or further notice is necessary.

19 **VI.**

20 **CONCLUSION**

21 For all of the foregoing reasons, the Committee respectfully requests entry of an order
22 granting the relief requested herein and such other and further relief as the Court may deem just
23 and appropriate.

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Dated: March 9, 2026

Respectfully submitted,

ARENTFOX SCHIFF LLP

By: /s/Christopher K.S. Wong
Aram Ordubegian
Christopher K.S. Wong
Attorneys for the Official Committee of
General Unsecured Creditors

DECLARATION OF CHRISTOPHER K.S. WONG

I, Christopher K.S. Wong, declare and state as follows:

1. I am a Partner at the firm ArentFox Schiff LLP (“AFS”), a law firm that has over 600 attorneys and maintains an office for the practice of law at 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013, as well as offices in San Francisco, CA, Washington, DC, Chicago, IL, Ann Arbor, MI, Boston, MA, and New York, NY. I have personal knowledge of the facts stated in this declaration (“Declaration”).

2. AFS serves as the general bankruptcy counsel for the Official Committee of General Unsecured Creditors (the “Committee”) of Imperial Pacific International (CNMI), LLC, the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 case (the “Case”). I am familiar with the Debtor’s bankruptcy proceeding and make this Declaration in support of *the Official Committee of General Unsecured Creditors’ First Omnibus Objection to Certain (I) Insufficient Documentation Claims, (II) Duplicate Claims, and (III) Amended & Superseded Claims* (the “Objection”).

3. I am over the age of eighteen. All statements in this Declaration are based upon my personal knowledge, my review (or the review of others under my supervision) of (i) the relevant proofs of claim and, if provided, all supporting information and documents provided therewith, (ii) the Claims Register, and/or (iii) the Debtor’s Schedules and Statements and other related pleadings in this Case. If called as a witness, I could and would competently testify to the facts set forth in this Declaration.

4. Based upon a careful review and analysis of the Schedules and Statements and the Insufficient Documentation Claims (including the related supporting documentation or lack thereof attached thereto), the Committee has determined that the Insufficient Documentation Claims listed on **Schedule 1** attached hereto provide insufficient substantiation for the asserted claims.

5. In evaluating the Duplicate Claims and corresponding Duplicate Remaining Claims, the Committee has determined that each of the Duplicate Claims identified on **Schedule 2** attached hereto was filed against the same debtor entity, on the same basis and by the same claimant as its corresponding Duplicate Remaining Claim identified on Schedule 2.

1 6. In evaluating the Amended & Superseded Claims and corresponding Amended and
2 Superseded Remaining Claims, the Committee has determined that each Amended & Superseded
3 Claim identified on **Schedule 3** attached hereto was amended and superseded by the corresponding
4 Amended and Superseded Remaining Claim identified on Schedule 3 on behalf of the same
5 claimant.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct. Executed this 9th of March 2026 at Los Angeles, California.

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/s/Christopher K.S. Wong
Christopher K.S. Wong

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Schedule 1
Insufficient Documentation Claims

No.	Claimant Name	Address	Claim No.	Date Filed	Claim Amount	Reason for Disallowance
1.	Albert Santos	P.O. BOX 10000 PMB 321 SAIPAN, MP 96950, Saipan	83	11/23/2024	\$690.89	Insufficient Documentation
2.	Alexander Palacios	PO BOX 500372 SAIPAN, MP 96950	33	10/20/2024	\$9,230.76	Insufficient Documentation
3.	Catherine Bucalig	2021 Rankin Street Thunder Bay, Ontario P7E 5Z8, Canada	143	12/2/2024	\$514.76	Insufficient Documentation
4.	Chengxiang Wang	1704 Heavenly Bamboo Ct San Jose, CA 95131	115	11/30/2024	\$860,000.00	Insufficient Documentation
5.	Chuncaai Liu	43281 Gallegos Ave Fremont, California 94539	131	12/1/2024	\$336,000.00	Insufficient Documentation
6.	Chunshneg Zhang	188 E. Garvey Ave. D231 Monterey Park, CA 91755	106	11/29/2024	\$320,000.00	Insufficient Documentation
7.	Delta Trading Co., Ltd	PMB A-7 Box 10001 Saipan, MP 96950	49	11/6/2024	\$5,363.48	Insufficient Documentation
8.	Derek Moses Castro	24926 112th Ave SE Apt 2 Kent, Washington 98030	68	11/15/2024	\$872.72	Insufficient Documentation
9.	Emee Rose Sacdalan	Blk 21 Lot 39 Camella Cielo Kaybanban San Jose Del Monte, Bulacan, 3023 Philippines	90	11/26/2024	\$197.25	Insufficient Documentation
10.	Emee Rose Sacdalan	Blk 21 Lot 39 Camella Cielo Kaybanban San Jose Del Monte, Bulacan, 3023 Philippines	93	11/26/2024	No amount listed	Insufficient Documentation

1	11.	Fabian Malabanan Jr.	Blk 21 Lot 39 Camella Cielo Kaybanban San Jose Del Monte, Bulacan, 3023 Philippines	94	11/26/2024	\$280.13	Insufficient Documentation
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5	12.	Gary Capote	37 Sage Street DreamHomes Subd., Dela Paz Pasig Ci, Pasig City, Manila, 1600 Philippines	81	11/21/2024	\$8,000.00	Insufficient Documentation
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9	13.	George Anthony Long	P.O. Box 18282 Fountain Hills, AZ 85269	46	10/31/2024	\$75,000.00	Insufficient Documentation
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11	14.	Guoxin Liu	309 145TH AVE NE Bellevue Seattle, Washington, 98007	111	11/29/2024	\$735,000.00	Insufficient Documentation
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14	15.	Hazel Bersabal	PMB 811 BOX 10003 Flores Rosa Street Garapan Saipan SAIPAN, CNMI 96950	135	12/1/2024	\$8,352.45	Insufficient Documentation
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17	16.	Isha A. King	9 Waban Street Saugus, MA 01906	104	11/28/2024	\$4,207.07	Insufficient Documentation
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19	17.	James Ulloa	P.O. Box 50556 Saipan, MP 96950	47	11/5/2024	No amount listed	Insufficient Documentation
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21	18.	Jay Sison	2900 Arborview Dr Apt 7 Traverse City, MI 49685	86	11/22/2024	\$323.80	Insufficient Documentation
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24	19.	Jesus Roann Awa	2021 Rankin Street Thunder Bay, Ontario P7E 5Z8, Canada	110	12/2/2024	\$1,035.90	Insufficient Documentation
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26	20.	Jianhua Zhou	13220 Beverly Park Rd Mukilteo, WA 98275	142	12/1/2024	\$273,000.00	Insufficient Documentation
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1	21.	Juanita Arriola	P.O. Box 7437 Svrb Saipan, MP 96950, USA	108	12/2/2024	\$107.74	Insufficient Documentation
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3	22.	Judy Ann Bravo	PMB 220 P.O Box 10000 SAIPAN, MP 96950	122	12/1/2024	\$2,100	Insufficient Documentation
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5	23.	Justin Keith Monnens	P.O. Box 10000 PMB 242 Saipan, MP 96950	130	11/30/2024	\$1,559.47	Insufficient Documentation
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8	24.	Kien Truong	909 SULPHUR SPRINGS LANE APT #202 LAS VEGAS, NV 89128	150	12/2/2024	\$1,708.66	Insufficient Documentation
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11	25.	Kirk Dagudog	P.O. Box 506570 Saipan, MP 96950	87	11/24/2024	\$369.84	Insufficient Documentation
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13	26.	Lavonne Ruiz	PMB 433 P.O. Box 10000 Saipan, MP 96950	71	11/18/2024	\$1,662.90	Insufficient Documentation
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15	27.	Loreto Daoa Jr.	22 M. Gacusan St., Sevilla Santa Cruz, Ilocos Sur, 2713 Philippines	92	11/26/2024	\$18,500.00	Insufficient Documentation
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18	28.	Loreto Daoa Jr.	22 M. Gacusan St., Sevilla Santa Cruz, Ilocos Sur, 2713 Philippines	103	11/27/2024	\$585.96	Insufficient Documentation
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21	29.	Maria Khristina Uy	10316 Rolling Bay Court Las Vegas, NV 89141	98	11/28/2024	\$854.66	Insufficient Documentation
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23	30.	Maria Veronica Suarez	P.O. Box 504736 Saipan, MP 96950	48	11/5/2024	\$10,395.38	Insufficient Documentation
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25	31.	Maricar Dizon	259 Douglas Drive Apt 152 Oceanside, California 92058, USA	55	11/11/2024	\$1,000.00	Insufficient Documentation
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1	32.	Mark Angelo Tarayao	P58-02 17th 16th street, Villamor Air Base Pasay, Manila, 1300 Philippines	96	11/27/2024	\$612.24	Insufficient Documentation
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5	33.	Mark Anthony Pangilinan	744 Dao Street Panilao Pilar Pilar, Bataan 2101, Philippines	62	11/14/2024	\$1,630.22	Insufficient Documentation
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7	34.	Michael Mascio	BOX 520053 Tinian, MP 96952, Northern Mariana Isl	82	11/22/2024	\$6,731.00	Insufficient Documentation
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10	35.	Pinina Bote	P.O. Box 503312 CK Saipan, MP 96950	89	11/26/2024	\$403.30	Insufficient Documentation
11							
12	36.	QingLiangSu	130 W Marine Corps Dr PMB 568 Dededo, Guam 96929, USA	116	11/30/2024	\$805,000.00	Insufficient Documentation
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14							
15	37.	Rich Surplus Ventures CNMI, LLC	Attn: Ms. Chan 72/F., The Centre, 99 Queens Road Central Central, Hong Kong, 00000	24	10/13/2024	\$360,000.00	Insufficient Documentation
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18	38.	Tat Mong Choi	P.O. Box 10000 PMB 486 Saipan, MP 96950	67	11/15/2024	No amount listed	Insufficient Documentation
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21	39.	Yunwang	113 Avondale Ave STE E Monterey Park CA 91754	117	11/30/2024	\$370,000.00	Insufficient Documentation
22							
23	40.	Zaldy T. Cutanda Jr.	Lot 12 Block 16, Bayswater Subdivision, POOC Talisay City, Cebu, 6045 Philippines	41	10/24/2024	\$1,589.45	Insufficient Documentation
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Schedule 2
Duplicate Claims

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No.	Claimant Name	Remaining Claim No.	Duplicate Claim to be Expunged	Claim Amount	Reason for Disallowance
1	Geotesting, Inc.	32	1	\$151,954.67	Duplicate Claim
2	Hemine Ipwan Islam dba IPWAN Security Services	102	101	\$194,869.85	Duplicate Claim
3	Olga J. Mata	51	50	\$7,000	Duplicate Claim

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Schedule 3
Amended & Superseded Claims

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No.	Claimant Name	Remaining Claim No.	Claim to be Expunged	Claim Amount to be Expunged	Reason for Disallowance
1	DAC Management LLC	152	16	\$470,006.61	Amended and Superseded Claim

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2026, 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 9th day of March, 2026.

/s/ Christopher K.S. Wong
Christopher K.S. Wong