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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**
17 **INTERNATIONAL (CNMI) LLC,**
18 Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**THE OFFICIAL COMMITTEE OF
GENERAL UNSECURED CREDITORS'
THIRD OMNIBUS OBJECTION TO
CLAIMS OF HENGDELI INTERNATIONAL
COMPANY LIMITED [CLAIM NO. 63] AND
KAISA GROUP HOLDINGS LTD. [CLAIM
NO. 64]; MEMORANDUM OF POINTS AND
AUTHORITIES; 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



1 **TO THE HONORABLE ROBERT J. FARIS, UNITED STATES BANKRUPTCY**
2 **JUDGE, AND OTHER INTERESTED PARTIES:**

3 The Official Committee of General Unsecured Creditors (the “Committee”) of Imperial
4 Pacific International (CNMI), LLC, the debtor and debtor in possession (the “Debtor”) in the above-
5 captioned chapter 11 case (the “Case”), hereby moves the Court for an Order pursuant to
6 Bankruptcy Code §§ 502 and 510 (the “Motion”) disallowing, in in their entirety, the following
7 claims filed by Hengdeli International Company Limited (“Hengdeli”) and Kaisa Group Holdings
8 Ltd. (“Kaisa,” together with Hengdeli, collectively, the “Claimants”):

- 9 A. a general unsecured claim in the amount of \$6,385,749.60 filed by Hengdeli as Claim
10 No. 63 on the claims register (the “Claims Register”) maintained by Verita Global, the
11 Debtor’s court appointed claims and noticing agent [See Exhibit “1”] (“Claim #63”);
12 and
13 B. a general unsecured claim in the amount of \$12,800,000 filed by Kaisa as Claim No. 64
14 on the Claims Register [See Exhibit “2”] (“Claim #64,” together with Claim #63,
15 collectively, the “Claims”).

16 This Objection is made and based on the attached Memorandum of Points and Authorities,
17 the Declaration of Christopher K.S. Wong (the “Wong Declaration”), all pleadings, papers,
18 documents and exhibits filed in support of this Objection, and such other and further evidence as
19 may be provided at or prior to the hearing on this Objection.

20 WHEREFORE, the Committee respectfully requests that the Court enter an Order:

- 21 1. disallowing the Claims in their entirety;
22 2. providing that any further claims filed by the Claimants, including any amendments of
23 the Claim, will be deemed disallowed without further Court order; and
24 3. for such other and further relief as the Court may deem just and proper.

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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

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **INTRODUCTION¹**

4 The Committee submits this omnibus objection to Claim #63 filed by Hengdeli and Claim
5 #64 filed by Kaisa because both Claims fail to satisfy the threshold requirements for prima facie
6 validity and must therefore be disallowed in their entirety. Neither Claimant has alleged facts
7 sufficient to establish any cognizable legal liability on the part of the Debtor. The documentation
8 submitted in support of these Claims consists of only wire transfer records reflecting deposits into
9 the Debtor’s bank account in August 2017, *i.e.*, more than seven years prior to the petition date.

10 Conspicuously absent from these filings is any evidence of the nature or purpose of these
11 transfers, any written or oral agreement governing the parties’ relationship, or any legal theory upon
12 which repayment could be compelled. A bare wire transfer record, without more, cannot sustain a
13 claim against the bankruptcy estate. The burden rests squarely on each Claimant to demonstrate a
14 valid basis for relief. That burden has not been met. Accordingly, Claims #63 and #64 should be
15 disallowed in their entirety.

16 **II.**

17 **FACTUAL BACKGROUND**

18 **A. Debtor’s Bankruptcy Case**

19 On April 19, 2024, the Debtor filed its voluntary petition for relief under Chapter 11 of the
20 Bankruptcy Code in the United States District Court for the Northern Mariana Islands, Bankruptcy
21 Division. The Debtor remains a debtor-in-possession pursuant to Sections 1107(a) and 1108 of the
22 Bankruptcy Code. On May 14, 2024, the Office of the United States Trustee appointed three
23 members to the Committee pursuant to Section 1102 of the Bankruptcy Code. On May 23, 2024,
24 the Debtor filed its Schedules of Assets and Liabilities and Statements of Financial Affairs
25 (collectively, the “Schedules and Statements”). *See* Docket No. 74.

26 In the bankruptcy case, on February 26, 2025, the Debtor conducted an auction of
27

28 ¹ Capitalized terms used but not immediately defined shall have the meanings ascribed to them below.

1 substantially all of its assets. Team King Investment (CNMI) LLC was the successful bidder,
2 acquiring the assets for \$12,950,000. On May 1, 2025, the Court entered its order approving the
3 sale. On August 20, 2025, the sale closed. After the deduction of sale-related expenses and
4 disbursement of payments, the remaining sale proceeds total approximately \$6,441,436.25.

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

15 **B. Claim # 63 filed by Hengdeli**

16 On November 15, 2024, Hengdeli filed Claim No. 63 as a general unsecured claim in the
17 amount of \$6,385,749.60. In its proof of claim, Hengdeli identifies the basis of its claim simply as
18 “Evidence of remittance.” The sole supporting documentation is a wire deposit record reflecting
19 that on August 31, 2017, a wire transfer in the amount of \$6,385,749.60 was transmitted from
20 Hengdeli International Company Limited through Standard Chartered Bank (Hong Kong) Limited
21 to the Debtor’s account at Bank of Saipan. The wire transfer documentation characterizes this
22 transaction as “Customer Transfer Plus,” without any additional explanation regarding the nature
23 or purpose of the transfer. Notably, Hengdeli has not attached any loan agreement, promissory
24 note, contract, invoice, or other documentation that would establish (i) the underlying basis for the
25 transfer of funds, (ii) the terms under which the funds were provided, (iii) whether the transfer
26 created a repayment obligation on the part of the Debtor, or (iv) whether any such obligation
27 remains legally enforceable.

28

1 **C. Claim #64 Filed by Kaisa**

2 On November 14, 2024, Kaisa filed Claim No. 64 as a general unsecured claim in the
3 amount of \$12,800,000. Kaisa likewise identifies the basis of its claim as “Evidence of remittance.”
4 The sole supporting documentation is a wire deposit record reflecting that on August 30, 2017, a
5 wire transfer in the amount of \$12,800,000 was transmitted from Kaisa Group Holdings Ltd.
6 through Bank of China (Hong Kong) Ltd. to the Debtor’s account at Bank of Saipan. The wire
7 transfer documentation characterizes this transaction as a “Customer Transfer,” without any
8 additional explanation regarding the nature or purpose of the funds. It also identifies “Imperial
9 Pacific International Holdings Limited” as a beneficiary for this fund transfer.

10 As with Hengdeli, Kaisa has not provided any loan agreement, promissory note, contract,
11 invoice, or other documentation that would establish: (i) the underlying basis for the transfer of
12 funds; (ii) the terms under which the funds were provided; (iii) whether the transfer created a
13 repayment obligation on the part of the Debtor; or (iv) whether any such obligation remains legally
14 enforceable.

15 **III.**

16 **ARGUMENT**

17 **A. Legal Standard**

18 Section 502 of the Bankruptcy Code provides: “[a] claim or interest, proof of which is filed
19 under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C.
20 § 502(a). Although Rule 3001(f) provides that “[a] proof of claim executed and filed in accordance
21 with these rules shall constitute prima facie evidence of the validity and amount of the claim,” this
22 presumption of a claim’s validity does not arise if the claim itself does not set forth the necessary
23 facts to establish the claim. See *Wright v. Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991);
24 *Ashford v. Consolidated Pioneer Mortgage (In re Consolidated Pioneer Mortgage)*, 178 B.R. 222,
25 226 (9th Cir. B.A.P. 1995). The Ninth Circuit sets forth the ultimate burden of persuasion is always
26 on the claimant. See *In re Holm*, 931 F.2d at 623. In *Consolidated Pioneer Mortgage*, the
27 Bankruptcy Appellate Panel of the Ninth Circuit stated as follows:

28 The burden of proof for claims brought in the bankruptcy court

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

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

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

28 **B. The Claimants Have Failed to Establish the Prima Facie Validity of Their Claims.**

Under the burden-shifting framework articulated in *In re Consolidated Pioneer Mortgage*,
a claimant must initially “allege facts sufficient to support the claim” before the claim is entitled to
prima facie validity. 178 B.R. at 226. The Claimants have failed to meet this threshold requirement
to establish the *prima facie* validity of their Claims because the documentation attached to their
Claims affirmatively negate any liability on the part of the Debtor.

The Claimants’ evidentiary support is inadequate to establish *prima facie* validity. Both

1 Hengdeli and Kaisa describe the basis of their respective claims solely as “Evidence of remittance”
2 and have attached nothing more than wire transfer records reflecting deposits into the Debtor’s
3 bank account in August 2017. A wire transfer record, standing alone, is not evidence of a claim
4 against the recipient of the funds. The record shows only that money moved from one account to
5 another; it says nothing about why, on what terms, or whether repayment was ever contemplated.

6 To establish a valid claim against the bankruptcy estate, a claimant must demonstrate a
7 “right to payment” under applicable non-bankruptcy law. *See* 11 U.S.C. § 101(5). Critically, no
8 such right arises from the mere fact that funds were transferred. Neither Hengdeli nor Kaisa has
9 attached any underlying agreement, promissory note, contract, or other document that would
10 demonstrate (i) that the wire transfers constituted loans or other transactions creating a repayment
11 obligation, (ii) the terms under which such funds were provided, or (iii) the existence of any
12 enforceable right to repayment. Furthermore, the wire transfers at issue occurred more than seven
13 years before the Debtor’s bankruptcy filing. Without any documentation specifying the terms of
14 these transfers, such as terms of repayment, maturity dates, or other material terms, there is simply
15 no basis to conclude that the Claimants possess any right to payment that remains valid and
16 enforceable under applicable non-bankruptcy law.

17 Under *In re Campbell*, any objection that raises a legal or factual ground to disallow a claim
18 will prevail over a proof of claim lacking such validity. 336 B.R. at 430. The Claimants have
19 failed to allege facts sufficient to support the existence of any legal liability on the part of the
20 Debtor. Accordingly, their Claims are not entitled to prima facie validity and should be disallowed
21 in their entirety.

22 IV.

23 CONCLUSION

24 For all of the foregoing reasons, the Committee respectfully requests that the Court enter an
25 Order (i) disallowing Claim #63 and Claim #64 in their entirety, (ii) providing that any further
26 claims filed by the Claimants, including any amendments of the Claim, will be deemed disallowed
27 without further Court order; and (iii) for such other and further relief as the Court may deem just
28 and proper.

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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 South Flower Street, 43rd Floor, Los Angeles, CA 90071, 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’ Third Omnibus Objection to Claims of Hengdeli International Company Limited [Claim No. 63] and Kaisa Group Holdings Ltd. [Claim No. 64]* (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. On April 19, 2024, the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code in this Court. The Debtor remains a debtor-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. On May 14, 2024, the Office of the United States Trustee appointed three members to the Committee pursuant to Section 1102 of the Bankruptcy Code.

5. The Committee have diligently worked with the Debtor to administer this estate, completing the sale of substantially all of the Debtor’s assets for \$12,950,000 to Team King Investment (CNMI) LLC, which closed on August 20, 2025. After the deduction of sale-related

1 expenses and disbursement of payments, the remaining sale proceeds total approximately
2 \$6,441,436.25.

3 6. On November 15, 2024, Hengdeli International Company Limited filed a proof of
4 claim as Claim No. 63 on the claims register (the “Claims Register”) maintained by Verita Global,
5 the Debtor’s court appointed claims and noticing agent, asserting a general unsecured claim in the
6 amount of \$6,385,749.60 (“Claim #63”). Attached hereto as **Exhibit “1”** is a true and correct copy
7 of Claim #63. This claim is also listed in Debtor’s schedules and corresponds to entry #3.592 on
8 the Debtor’s Schedule F.

9 7. On November 13, 2024, Kaisa Group Holdings Ltd. filed a proof of claim as Claim
10 No. 64 on asserting a general unsecured claim in the amount of \$12,800,000 (“Claim #64”).
11 Attached hereto as **Exhibit “2”** is a true and correct copy of Claim #64. This claim is also listed
12 in Debtor’s schedules and corresponds to entry #3.827 on the Debtor’s Schedule F.

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

15
16 /s/ Christopher K.S. Wong
17 Christopher K.S. Wong
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EXHIBIT 1

Fill in this information to identify the case:

Debtor Imperial Pacific International (CNMI), LLC

United States Bankruptcy Court for the: _____ District of Northern Mariana Islands
(State)

Case number 24-00002

**Official Form 410
Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Hengdeli International Company Limited</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	See summary page	
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Contact phone _____	Contact phone _____
	Contact email <u>zhangjiling1963@gmail.com</u>	Contact email _____
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. How much is the claim? \$ 6,385,749.60. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.

Evidence of remittance

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature or property:
 Real estate: If the claim is secured by the debtor's principle residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____

Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

- No
- Yes. Check all that apply:

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

- | | Amount entitled to priority |
|--|-----------------------------|
| <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). | \$ _____ |
| <input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). | \$ _____ |
| <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). | \$ _____ |
| <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). | \$ _____ |
| <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). | \$ _____ |
| <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies. | \$ _____ |

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 11/15/2024
MM / DD / YYYY

/s/Hengdeli International Company Limited
Signature

Print the name of the person who is completing and signing this claim:

Name Hengdeli International Company Limited
First name Middle name Last name

Title _____

Company Hengdeli International Company Limited
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (781) 575-2042 | International (781) 575-2042

Debtor: 24-00002 - Imperial Pacific International (CNMI), LLC		
District: District of Northern Mariana Islands, Bankruptcy Division		
Creditor: Hengdeli International Company Limited Room 301, 3/F., Lippo Sun Plaza 28 Canton Road, Tsim Sha Tsui Hong Kong, Hong Kong, 999077 Hong Kong SAR Phone: Phone 2: Fax: Email: zhangjiling1963@gmail.com	Has Supporting Documentation: Yes, supporting documentation successfully uploaded	
	Related Document Statement:	
	Has Related Claim: No	
	Related Claim Filed By:	
		Filing Party: Creditor
Other Names Used with Debtor:	Amends Claim: No	
	Acquired Claim: No	
Basis of Claim: Evidence of remittance	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 6,385,749.60	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No	Nature of Secured Amount:	
Based on Lease: No	Value of Property:	
Subject to Right of Setoff: No	Annual Interest Rate:	
	Arrearage Amount:	
	Basis for Perfection:	
	Amount Unsecured:	
Submitted By: Hengdeli International Company Limited on 15-Nov-2024 3:36:08 a.m. Eastern Time		
Title:		
Company: Hengdeli International Company Limited		

Cassandra Palacios

Data Access Set: SPN Ledger (USD)

Edit Journal

Save Complete Post Cancel

Journal Batch: CSP - Wire Deposit - HK 01-SEP-2017 04:25:33 | Show More

Batch Actions

Journal | Show More

◀ CSP - Wire Deposit - HK ▶ + X | Journal Actions

Journal	CSP - Wire Deposit - HI	Currency	USD - US Dollar
Description	CSP - To record wire deposit & bank	Conversion Date	8/31/17
Ledger	SPN Ledger (USD)	Conversion Rate Type	User
Legal Entity Name	Imperial Pacific International (CNMI) LLC	Conversion Rate	1
* Accounting Date	8/31/17	Inverse Conversion Rate	1
* Category	Adjustment		

Journal Lines

Actions View Format + [] X [] [] Detach [] Wrap

Line	* Account	Entered (USD)		Description
		Debit	Credit	
1	2120.000000.1110200.000000.00	6,385,724.60		CSP - To record wire deposit & bank charges - HK
2	2120.000000.2190100.000000.0000.1000.		6,385,749.60	CSP - To record wire deposit - HK
3	2120.531100.6680100.000000.0000.0000.	25.00		CSP - To record wire deposit bank charges - HK
Total		6,385,749.60	6,385,749.60	

Columns Hidden 7

Imperial Pacific International (CNMI), LLC *2023

ACTIVITY
29 recent

ALERTS
Manage Alerts

Date	Description	Category	Credit	Debit
8/31/2017	Wire Fee	Select one		25.00
8/31/2017	Wire Deposit	Select one	6,385,749.60	

FedPayments ManagerSM -- Funds

Delivered to FPM: 08/30/2017 03:58:21 Test/Prod: Prod
 IMAD: 20170830 B1Q9282C 001644 08300358
 OMAD: 20170830 QMGFNP65 000119 08300358

BASIC INFORMATION

Sender ABA {3100}: 026002561 STANDARD CHART
 Receiver ABA {3400}: 121403078 BANK OF SAIPAN
 Amount {2000}: 6,385,749.60
 Type/Subtype Code {1510}: 1000 - Transfer of Funds
 Business Function {3600}: CTP - Customer Transfer Plus
 Sender Reference {3320}: 2017083000049970
 Reference for Beneficiary {4320}: 2021T17081003979

ORIGINATOR INFORMATION

Originator {5000}
 ID Code: D - DDA Account Number
 Identifier: 95610660846
 Name: HENGDELI INTERNATIONAL COMPANY LIM
 Address: TED UNIT 3805 09 TOWER 6 THE GATEWA
 Y HARBOUR CITY TSIM SHA TSUI KLN
 /HONG KONG

Originator FI {5100}

ID Code: B - SWIFT Bank Identifier Code
 Identifier: SCBLHKHH
 Name: STANDARD CHARTERED BANK (HONG KONG)
 Address: LIMITED
 FLOOR 32
 HONG KONG, HK

Instructing FI {5200}

ID Code: B - SWIFT Bank Identifier Code
 Identifier: SCBLHKHH
 Name: STANDARD CHARTERED BANK (HONG KONG)
 Address: LIMITED
 4-4A DES VOEUX ROAD CENTRAL
 HONG KONG

BENEFICIARY INFORMATION

Beneficiary {4200}
 ID Code: D - DDA Account Number
 Identifier: 215002023
 Name: IMPERIAL PACIFIC INTERNATIONAL
 Address: (CNMI), LLC 3RD FLOOR BANK OF
 GUAM BUILDING GARAPAN,
 SAIPAN, MP 96950

Beneficiary FI {4100}

ID Code: D - DDA Account Number
 Identifier: THE BANK OF SAIPAN
 Name: PO BOX 500690, SAIPAN
 Address: MP 96950, USA
 SWIFT CODE BSAIMPH1
 ROUTING NO 121403078

CHARGES & EXCHANGE RATE INFORMATION

Charges {3700}
 Details of Charges: S - Charges shared between the originator and beneficiary

08/30/2017 18:16:25

544
 IMPERIAL PACIFIC INT'L CNMI LLC
 OPERATION ACCOUNT
 3RD FLR BANK OF GUAM BLDG ALAIHAI AVE
 ALAIHAI AVENUE PO BOX 10000
 GARAPAN SAIPAN MP 96950

215002023

Aug 31, 2017

Pg 1 of 56

Business Checking		
08/01/2017	Beginning Balance	10,434,917.66
	19 Deposits/Other Credits	+ 44,524,736.11
	538 Checks/Other Debits	- 50,499,944.83
08/31/2017	Ending Balance	4,459,708.94
	31 Days in Statement Period	

----- Deposits/Other Credits -----		
08/01/2017	Deposit	800,000.00
08/02/2017	Deposit	4,235.00
08/03/2017	Deposit	6,000.00
08/09/2017	Deposit	7,535.66
08/09/2017	Deposit	87,000.00
08/09/2017	Deposit	100,000.00
08/10/2017	Deposit	4,000.00
08/10/2017	Wire Deposit	54,755.00
08/11/2017	Deposit	300,000.00
08/14/2017	Deposit	6,392,164.11
08/16/2017	Credit Adjustment	706.50
	ATM surcharge share - July 2017	
08/17/2017	Deposit	14,580,000.00
08/22/2017	Deposit	1,000,000.00
08/23/2017	Deposit	2,319.66
08/24/2017	Deposit	270.20
08/25/2017	Wire Deposit	2,000,000.00
08/30/2017	Wire Deposit	12,800,000.00
08/31/2017	Wire Deposit	6,385,749.60
08/31/2017	Accr Earning Pymt	0.38
	Added to Account	

EXHIBIT 2

Fill in this information to identify the case:

Debtor Imperial Pacific International (CNMI), LLC

United States Bankruptcy Court for the: _____ District of Northern Mariana Islands
(State)

Case number 24-00002

**Official Form 410
Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?

KAISA GROUP HOLDINGS LTD.
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

See summary page

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Contact phone _____ Contact phone _____
Contact email liujingjing8383@gmail.com Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

No
 Yes. Claim number on court claims registry (if known) _____ Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No
 Yes. Who made the earlier filing? _____



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. How much is the claim? \$ 12,800,000. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.

Evidence of remittance

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature or property:
 Real estate: If the claim is secured by the debtor's principle residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____

Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

- No
- Yes. Check all that apply:

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

- | | Amount entitled to priority |
|--|-----------------------------|
| <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). | \$ _____ |
| <input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). | \$ _____ |
| <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). | \$ _____ |
| <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). | \$ _____ |
| <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). | \$ _____ |
| <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies. | \$ _____ |

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 11/15/2024
MM / DD / YYYY

/s/KAISA GROUP HOLDINGS LTD.
Signature

Print the name of the person who is completing and signing this claim:

Name KAISA GROUP HOLDINGS LTD.
First name Middle name Last name

Title _____

Company KAISA GROUP HOLDINGS LTD.
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (781) 575-2042 | International (781) 575-2042

Debtor: 24-00002 - Imperial Pacific International (CNMI), LLC		
District: District of Northern Mariana Islands, Bankruptcy Division		
Creditor: KAISA GROUP HOLDINGS LTD. 30th Floor, The Center 99 Queens Road Central Hong Kong, Hong Kong, 999077 Hong Kong SAR Phone: Phone 2: Fax: Email: liujingjing8383@gmail.com	Has Supporting Documentation: Yes, supporting documentation successfully uploaded	
	Related Document Statement:	
	Has Related Claim: No	
	Related Claim Filed By:	
		Filing Party: Creditor
Other Names Used with Debtor:	Amends Claim: No	
	Acquired Claim: No	
Basis of Claim: Evidence of remittance	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 12,800,000	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No	Nature of Secured Amount:	
Based on Lease: No	Value of Property:	
Subject to Right of Setoff: No	Annual Interest Rate:	
	Arrearage Amount:	
	Basis for Perfection:	
	Amount Unsecured:	
Submitted By: KAISA GROUP HOLDINGS LTD. on 15-Nov-2024 2:56:45 a.m. Eastern Time		
Title:		
Company: KAISA GROUP HOLDINGS LTD.		

Cassandra Palacios

Data Access Set: SPN Ledger (USD)

Edit Journal

Save Complete Post Cancel

Journal Batch: CSP - Wire Deposit - HK 30-AUG-2017 23:38:05 [Show More](#)

Batch Actions

Journal [Show More](#)

◀ CSP - Wire Deposit - HK ▶ + X Journal Actions

Journal	CSP - Wire Deposit - HI	Currency	USD - US Dollar
Description	CSP - To record wire deposit & bank	Conversion Date	8/30/17
Ledger	SPN Ledger (USD)	Conversion Rate Type	User
Legal Entity Name	Imperial Pacific International (CNMI) LLC	Conversion Rate	1
* Accounting Date	8/30/17	Inverse Conversion Rate	1
* Category	Adjustment		

Journal Lines

Actions View Format + [] X [] [] Detach [] Wrap

Line	* Account	Entered (USD)		Description
		Debit	Credit	
1	2120.000000.1110200.000000.00	12,799,975.00		CSP - To record wire deposit & bank charges - HK
2	2120.000000.2190100.000000.0000.1000.		12,800,000.00	CSP - To record wire deposit - HK
3	2120.531100.6680100.000000.0000.0000.	25.00		CSP - To record wire deposit bank charges - HK
Total		12,800,000.00	12,800,000.00	

Columns Hidden 7

Imperial Pacific International (CNMI), LLC *2023

ACTIVITY
no recent

ALERTS
Manage Alerts

Date	Description	Category	Credit	Debit
8/30/2017	Wire Fee	Select one		25.00
8/30/2017	Wire Deposit	Select one	12,800,000.00	

FedPayments ManagerSM -- Funds

Delivered to FPM: 08/28/2017 09:20:30 Test/Prod: Prod
 IMAD: 20170828 B1QB3B3C 004888 08280920
 OMAD: 20170828 QMGFNP64 000526 08280920

BASIC INFORMATION

Sender ABA {3100}: 021001033 DBTCO AMERICAS NYC
 Receiver ABA {3400}: 121403078
 Amount {2000}: 12,800,000.00
 Type/Subtype Code {1510}: 1000 - Transfer of Funds
 Business Function {3600}: CTR - Customer Transfer
 Sender Reference {3320}: 0828256697004971
 Reference for Beneficiary {4320}: 1217082887512694

ORIGINATOR INFORMATION

Originator {5000}

ID Code: D - DDA Account Number
 Identifier: 01287592736269
 Name: KAISA GROUP HOLDINGS LTD
 Address: GOVT ISSUE NO.:39433977000

Originator FI {5100}

ID Code: B - SWIFT Bank Identifier Code
 Identifier: BKCHHKHH
 Name: BANK OF CHINA HONG KONG LTD.
 Address: BANK OF CHINA TOWER ATT:CORR BKG DE
 NO. 1 GARDEN ROAD
 HONG KONG

Instructing FI {5200}

ID Code: B - SWIFT Bank Identifier Code
 Identifier: BKCHHKHHXXX
 Name: BANK OF CHINA HONG KONG LTD.
 Address: BANK OF CHINA TOWER ATT:CORR BKG DE
 NO. 1 GARDEN ROAD
 HONG KONG

Originator to Beneficiary Information {6000}

Text: BENEFICIARY:IMPERIAL PACIFIC INTERN
 ATIONAL HOLDINGS LIMITED:OFFICE:CLA
 RENDON HOUSE,2 CHURCH STREET,HAMILT
 ON HM11,BERMUDA

BENEFICIARY INFORMATION

Beneficiary {4200}

ID Code: D - DDA Account Number
 Identifier: 215002023
 Name: IMPERIAL PACIFIC INTERNATIONAL
 Address: (CNMI), LLC

544
 IMPERIAL PACIFIC INT'L CNMI LLC
 OPERATION ACCOUNT
 3RD FLR BANK OF GUAM BLDG ALAIHAI AVE
 ALAIHAI AVENUE PO BOX 10000
 GARAPAN SAIPAN MP 96950

215002023

Aug 31, 2017

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Business Checking		
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	31 Days in Statement Period	

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08/02/2017	Deposit	4,235.00
08/03/2017	Deposit	6,000.00
08/09/2017	Deposit	7,535.66
08/09/2017	Deposit	87,000.00
08/09/2017	Deposit	100,000.00
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08/11/2017	Deposit	300,000.00
08/14/2017	Deposit	6,392,164.11
08/16/2017	Credit Adjustment	706.50
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08/17/2017	Deposit	14,580,000.00
08/22/2017	Deposit	1,000,000.00
08/23/2017	Deposit	2,319.66
08/24/2017	Deposit	270.20
08/25/2017	Wire Deposit	2,000,000.00
08/30/2017	Wire Deposit	12,800,000.00
08/31/2017	Wire Deposit	6,385,749.60
08/31/2017	Accr Earning Pymt	0.38
	Added to Account	

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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