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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.

Case No.: 1:24-bk-00002
Chapter 11
**NOTICE OF CLAIMS BAR DATE IN
CHAPTER 11 CASE**

Hon. Ramona V. Manglona

**TO ALL CREDITORS, EQUITY SECURITY HOLDERS, PARTIES REQUESTING
NOTICE AND OTHER PARTIES-IN-INTEREST:**

The United States District Court for the Northern Mariana Islands, Bankruptcy Division (the “Bankruptcy Court”) has entered an order (the “Bar Date Order”) extending to and establishing **December 2, 2024 at 11:59 p.m. (ChST)** (the “Bar Date”) as the last date and time for each (i) person (as defined in section 101(41) of the Bankruptcy Code), and (ii) governmental unit (as defined in section 101(27) of the Bankruptcy Code, collectively, the “Governmental Units”) to file a proof of claim (each a “Proof of Claim”) in respect of a prepetition claim (as defined in section 101(5) of the Bankruptcy Code), including, for the avoidance of doubt, secured claims and priority claims against either of the above-listed debtor (the “Debtor”).

1 The Bar Date and the procedures set forth below for filing Proofs of Claim apply to all
2 claims against the Debtor that arose before April 19, 2024 (the “Petition Date”), the date on which
3 the Debtor commenced the above-captioned bankruptcy case under chapter 11 (the “Chapter 11
4 Case”) of title 11 of the United States Code (the “Bankruptcy Code”).

5 **1. WHO MUST FILE A PROOF OF CLAIM**

6 You **MUST** file a Proof of Claim to vote on a chapter 11 plan filed by the Debtor or to share
7 in distributions from the Debtor’s bankruptcy estate if you have a claim that arose before the
8 Petition Date, and it is not one of the types of claims described in Section 4 below. Claims based
9 on acts or omissions of the Debtor that occurred before the Petition Date must be filed on or before
10 the Bar Date, even if such claims are not now fixed, liquidated or certain or did not mature or
11 become fixed, liquidated or certain before the Petition Date.

12 Under section 101(5) of the Bankruptcy Code and as used in this notice, the word “claim”
13 means a right to (a) payment, whether such right is reduced to judgment, liquidated, unliquidated,
14 fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or
15 unsecured; or (b) an equitable remedy for breach of performance if such breach gives rise to a right
16 to payment, whether such right to an equitable remedy is reduced to judgment, fixed, contingent,
17 matured, unmatured, disputed, undisputed, secured, or unsecured.

18 **2. WHAT TO FILE**

19 The Debtor is enclosing a Proof of Claim form for use by claimants in the Chapter 11 Case
20 (the “Proof of Claim Form”). If your claim is listed on the schedules of assets and liabilities filed
21 by the Debtor (collectively, the “Schedules”), the Proof of Claim form also sets forth the amount
22 of your claim as listed on the Schedules, if applicable, whether the claim is scheduled as “disputed,”
23 “contingent,” or “unliquidated.” You may utilize the Proof of Claim Form(s) provided by the
24 Debtor to file your claim. Additional Proof of Claim Forms and instructions may be obtained at
25 (a) the website established by the Court-approved claims and noticing agent, Kurtzman Carson
26 Consultants, LLC, doing business as Verita Global (“Verita”), located at
27 <https://www.veritaglobal.net/ipi> (the “Case Website”) or (b) the Bankruptcy Court’s website
28 located at www.uscourts.gov/forms/bankruptcy-forms.

1 All Proof of Claim Forms must be **signed** by the claimant or, if the claimant is not an
2 individual, by an authorized agent of the claimant. It must be written in English and be denominated
3 in United States currency (using the exchange rate, if applicable, as of the Petition Date). You also
4 should attach to your completed Proof of Claim any documents on which the claim is based (if
5 voluminous, attach a summary) or explanation as to why the documents are not available.

6 Your Proof of Claim Form must not contain complete social security numbers or taxpayer
7 identification numbers (only the last four (4) digits), a complete birth date (only the year), the name
8 of a minor (only the minor's initials), or a financial account number (only the last four (4) digits of
9 such account number).

10 **3. WHEN AND WHERE TO FILE**

11 All Proofs of Claim must be filed so as to be received on or before **December 2, 2024, at**
12 **11:59 p.m. (ChST)** as follows:

13 **If electronically:**

14 The Case Website established by Verita, using the interface available on such website
15 (<https://www.veritaglobal.net/ipi>) under the link entitled "Submit Electronic Proof of Claim
16 (ePOC)" (the "Electronic Filing System").

17 **If by first class mail:**

18 Imperial Pacific International (CNMI), LLC Claims Processing Center
19 c/o KCC dba Verita Global
20 222 N. Pacific Coast Hwy., Ste. 300
El Segundo, CA 90245

21 **4. WHO NEED NOT FILE A PROOF OF CLAIM**

22 You do **not** need to file a Proof of Claim on or before the Bar Date if you are:

23 (a) any person or entity that has already properly filed a proof of claim against the
24 Debtor with the Clerk of the Court for the U.S. District Court (Bankruptcy Division)
25 for Northern Mariana Islands (Northern Mariana Islands);

26 (b) any person or entity: (i) whose claim the Debtor listed in the Schedules or any
27 amendments thereto, and (ii) whose claim the Debtor did not describe in the
28 Schedules as "disputed," "contingent," or "unliquidated," and (iii) that does not

1 dispute the amount or classification of its claim as set forth in the Schedules;

2 (c) professionals retained pursuant to orders of this Court that assert administrative
3 claims for payment of fees and expenses subject to the Court's approval pursuant to
4 §§ 330, 331(a), and 503(b) of the Bankruptcy Code;

5 (d) any person or entity that asserts an administrative expense claim against the Debtor
6 pursuant to §§ 503(b)(1) through (8);

7 (e) any person or entity whose claim has been paid in full; and

8 (f) the U.S. Trustee regarding a claim for quarterly fees under 28 U.S.C. § 1930(a)(6).

9 This notice may be sent to many persons that have had some relationship with or have done
10 business with the Debtor but may not have an unpaid claim against the Debtor. **The fact that you**
11 **have received this notice does not mean that you have a claim or that the Debtor or the**
12 **Bankruptcy Court believe that you have a claim against the Debtor.**

13 **5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

14 If you hold a claim arising out of the rejection of an executory contract or unexpired lease
15 you must file a Proof of Claim Form based on such rejection by the later of (i) the Bar Date, and
16 (ii) the date that is thirty (30) days following the entry of the Bankruptcy Court's order approving
17 such rejection (which order may be the order confirming a chapter 11 plan for the Debtor), or be
18 forever barred from doing so. Notwithstanding the foregoing, a party to an executory contract or
19 unexpired lease that asserts a claim on account of unpaid amounts accrued and outstanding as of
20 the Petition Date pursuant to such executory contract or unexpired lease (other than a rejection
21 damages claim) must file a Proof of Claim Form for such amounts on or before the Bar Date unless
22 an exception identified in Section 4 above applies.

23 **6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE BAR**
24 **DATE**

25 ANY HOLDER OF A CLAIM THAT IS NOT EXEMPTED FROM THE
26 REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH IN SECTION 4 ABOVE,
27 AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN THE APPROPRIATE FORM
28 SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE

1 PURPOSES OF VOTING ON ANY PLAN OF REORGANIZATION FILED IN THE CHAPTER
2 11 CASE AND PARTICIPATING IN ANY DISTRIBUTION IN THE CHAPTER 11 CASE ON
3 ACCOUNT OF SUCH CLAIM.

4 **7. THE DEBTOR'S SCHEDULES AND ACCESS THERETO**

5 You may be listed as a holder of a claim against the Debtor in the Schedules. To determine
6 if and how you are listed on the Schedules, please refer to the descriptions set forth on the enclosed
7 Proof of Claim Form(s) regarding the nature, amount, and status of your claim(s). If you received
8 postpetition payments from the Debtor (as authorized by the Bankruptcy Court) on account of your
9 claim(s), the enclosed Proof of Claim Form should reflect the net amount of your claim(s).

10 If you rely on the Schedules or the enclosed Proof of Claim Form(s), it is your responsibility
11 to determine that the claim accurately is listed on the Schedules. However, you may rely on the
12 enclosed form, which lists your claim as scheduled, identifies the Debtor against which it is
13 scheduled, and specifies whether the claim is disputed, contingent, or unliquidated.

14 As set forth above, if you agree with the nature, amount, and status of your claim as listed
15 in the Debtor's Schedules, and if you do not dispute that your claim only is against the Debtor
16 specified by the Debtor, **and** if your claim is not described as "disputed," "contingent," or
17 "unliquidated," you need **not** file a Proof of Claim. Otherwise, or if you decide to file a Proof of
18 Claim, you must do so before the applicable Bar Date, in accordance with the procedures set forth
19 in this notice.

20 Copies of the Schedules are available for inspection on the Bankruptcy Court's electronic
21 docket for the Debtor's Chapter 11 Case, which is posted on (a) the Case Website, and (b) on the
22 Bankruptcy Court's website at <https://ecf.nmib.uscourts.gov>. A login and password to the
23 Bankruptcy Court's Public Access to Electronic Records ("PACER") are required to access this
24 information on the Bankruptcy Court's website and can be obtained through the PACER Service
25 Center at <http://www.pacer.gov>.

26 **Please note that Verita cannot provide legal advice, nor can they advise you as to**
27 **whether you should file a Proof of Claim. A holder of a potential claim against the Debtor**

1 **should consult an attorney regarding any matters not covered by this notice, such as whether**
2 **the holder should file a Proof of Claim.**

3
4 Dated: October 9, 2024

CHOI & ITO ATTORNEYS AT LAW

6 By: /s/ Chuck C. Choi
7 Chuck C. Choi
8 Allison A. Ito
9 Attorneys for Imperial Pacific International
10 (CNMI), LLC, the debtor and debtor in
11 possession

12 Dated: October 9, 2024

ARENTFOX SCHIFF LLP

13
14 By: /s/ Aram Ordubegian
15 Aram Ordubegian
16 Christopher K.S. Wong
17 Attorneys for the Official Committee of
18 General Unsecured Creditors
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