


H2014 (10/20)

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| Filer's Name, Address, Phone, email:<br>MCDONALD LAW OFFICE<br>CHARLES MCDONALD<br>2nd Floor ICC, Room 203<br>Gualo Rai, Saipan, MP 96950<br>Tel: (866) 967-7567<br>E-Mail: charles@mcdonald.law |  |  |
| Proposed Local Counsel for<br>IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC   |  |   |
| <b>UNITED STATES BANKRUPTCY COURT<br/>                 DISTRICT OF HAWAII</b><br>1132 Bishop Street, Suite 250, Honolulu, Hawaii 96813   |  |   |
| Debtor(s): IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC  |  | Case No.: 24-00002  |

**APPLICATION TO EMPLOY PROFESSIONAL**

*[Attach the professional's verification of disinterestedness and any necessary supplemental statements.]*

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| Name of Professional:  | Michael Chen Law Offices (the "Firm")  |
| Type of Professional:  | Special Litigation Counsel   |
| To be employed by:   | <input type="checkbox"/> Trustee <input checked="" type="checkbox"/> Debtor in Possession <input type="checkbox"/> Committee:  |
| Briefly state need for employment and describe services to be rendered:  | The Debtor special litigation counsel to assist the Debtor in litigation matters that may arise in this case. In the year preceding the Petition Date, the Firm represented the Debtor in proceedings before the Commonwealth Casino Commission ("CCC") and in at least three lawsuits in the U.S. District Court for the District of the Northern Mariana Islands. It is critical that the Firm be allowed to continue those matters as they are necessary to a successful reorganization.<br><br><input checked="" type="checkbox"/> If checked, employment is for specified special purpose under 11 U.S.C. § 327(e). |
| Reason for selecting this professional:  | The Firm has extensive experience in litigation matters before this Court. The Firm has substantial working knowledge concerning the Debtor and its operations.  |
| Terms and conditions of employment:  | Employment to be effective as of April 19, 2024, the petition date. The current billing rate for the primary attorney Michael Chen, is \$350/hour. The Firm will file fee applications in accordance with the Bankruptcy Code, Federal Rules of Civil Procedure and Local Bankruptcy Rules.  |
| The undersigned hereby applies for an order approving employment of the above-named professional as described above. To the best of the applicant's knowledge: <i>[Check all that apply]</i> |  |
| <input checked="" type="checkbox"/>  | This professional does not hold or represent an interest adverse to the estate, and has no connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except to the extent described in any statement attached to this application.  |
| <input checked="" type="checkbox"/>  | Employment of this attorney is for a special purpose only; s/he does not represent or hold any interest adverse to the debtor(s) or to the estate with respect to this employment.   |
| <input type="checkbox"/>   | Employment is by a committee; the professional does not represent any other entity having an adverse interest in connection with the case.   |

Date: 4/23/2024

/s/ Howyo Chi

Applicant [Print name and sign]



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**VERIFIED STATEMENT BY PROFESSIONAL**

*[Attach this statement to the Application to Employ Professional. If filed separately, attach a cover sheet.]*

- I am a disinterested person. I have no connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except to the extent that I may be employed by a trustee in unrelated bankruptcy cases or proceedings.
- I am an attorney being employed for a special purpose only and do not represent or hold any interest adverse to the debtor(s) or to the estate with respect to this employment.
- I am being employed by a committee and do not represent any other entity having an adverse interest in connection with this case.
- The following disclosure is made regarding disinterestedness:

I am a Partner at Michael Chen Law Offices ("Firm") proposed special litigation counsel for the Debtor. I served as lead counsel for IPI in the following matters: (a) revocation proceeding before the CCC; (b) federal lawsuits against CNMI government and CCC commissioners; (c) defending IPI in federal lawsuits against a number of creditors; (d) advise IPI on potential litigation and arbitration matters. I am licensed in the State of Utah and California. My bar number in Utah is 09359 and 218863 in California.

In the one year prior to the Petition Date, the Firm has received \$ 229,227.00 in fees and costs. The Firm is owed \$0.00 as of the Petition Date. The Firm is currently holding a retainer balance of \$43,020.40 in its client trust account. My hourly billing rate is \$350.00.

To the best of my knowledge, information and belief and based on a review of the Debtor's list of creditors (excluding employees and patrons), the Firm does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which the Firm is to be employed.

Date: 4/22/2024

/s/ Michael Chen  
Professional [Print name and sign]