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Proposed Attorneys for Debtor
and Debtor-in-Possession

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS
BANKRUPTCY DIVISION

In re

IMPERIAL PACIFIC INTERNATIONAL
(CNMI), LLC,

Debtor and
Debtor-in-Possession.

Case No. 24-00002
Chapter 11

**EMERGENCY EX PARTE MOTION TO
SHORTEN TIME ON VARIOUS “FIRST-
DAY” MOTIONS AND REQUEST FOR
PERMISSION TO APPEAR REMOTELY;
DECLARATION OF CHUCK C. CHOI**

**EMERGENCY MOTION TO SHORTEN TIME ON VARIOUS “FIRST-DAY”
MOTIONS AND REQUEST FOR PERMISSION TO APPEAR REMOTELY**



1 Imperial Pacific International (CNMI), LLC debtor and debtor-in-possession (“Debtor”),
2 hereby moves this Court pursuant to L.R. 7.1(f) and LBR 9006-1(b) to shorten the time for a
3 hearing on the following:

- 4 1. Application to Employ Choi & Ito and McDonald Law Office as Co-Counsel for the
5 Debtor
- 6 2. Pro Hac Vice Application for Chuck C. Choi, Esq.
- 7 3. Pro Hac Vice Application for Allison A. Ito, Esq.
- 8 4. Application to Employ Michael Chen Law Offices as special litigation counsel for the
9 Debtor.
- 10 5. Motion for Interim Fee Procedures
- 11 6. Motion For Order Authorizing Debtor to Pay Pre-Petition Wages and Other
12 Employment-Related Costs And Expenses
- 13 7. Motion For Order Authorizing Debtor to Obtain Postpetition Secured Indebtedness

14 This Motion is based on the accompanying Memorandum of Points and Authorities filed
15 contemporaneously herewith, the attached declaration, and such other and further matters as may
16 be presented Herein.

17 MEMORANDUM OF POINTS AND AUTHORITIES

18 This Motion is made pursuant to L.R. 7.1(f) ad 83.4(b) of the Civil Local Rules of the
19 United States District Court for the Northern Mariana Islands, LBR 9006-1, LBR 9013-1, and
20 Rule 9006 of the Federal Rules of Bankruptcy Procedure.

21 The Debtor seeks the entry of an order scheduling the above-listed First Day Motions for
22 9:00 a.m. on April 26, 2024. The Debtor requests relief on an emergency basis with respect
23 to those motions that are essential to the uninterrupted functioning of the Debtor's
24 business operations.
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1 The Debtor respectfully request to shorten time to address amongst other things (1) ensure
2 representation of a corporate entity by counsel in this proceeding; (2) borrow funds on an
3 emergency and interim basis to make payroll on May 3, 2024.

4 **Proposed Hearing Date and Time:** April 26, 2024, 9:00 a.m. (ChST)

5 **Proposed Deadline for Responses:** Up to hearing

6 **Proposed Deadline for Reply:** N/A

7
8 It is critical to the Debtor's business operations that the Court schedule the First Day
9 Hearing, and allow the Debtor to provide the notice of the First Day Hearing and First Day
10 Motions to the creditors and parties-in-interest, as set forth above, on an expedited basis.

11 The Debtor, through its counsel or otherwise, proposes to provide notice of the hearing to
12 consider the First Day Motions by telephone, facsimile, hand delivery, or electronic mail, to at
13 least the following parties:

- 14
- 15 a. Office of the United States Trustee
 - 16 b. Debtor's twenty largest unsecured creditors
 - 17 c. Internal Revenue Service
 - 18 d. Commonwealth Casino Commission
 - 19 e. Commonwealth Revenue and Taxation
 - 20 f. Secured creditors
 - 21 g. Department of Public Lands for Northern Mariana Islands.
- 22
23

24 The Debtor submits that based upon the foregoing, cause exists to schedule a hearing to
25 consider the First Day Motions on the morning of April 26, 2024, or as soon thereafter as
26 possible.

27 The Debtor also requests that its proposed attorneys (Charles H. McDonald II of the
28

1 McDonald Law Office, Chuck C. Choi, Esq. and Allison A. Ito, Esq., of Choi & Ito, Attorneys
2 at Law, and Michael Chen, Esq., of the Michael Chen Law Offices) be permitted to appear by
3 video-conference or by telephone at the interim hearing, as counsel Choi, Ito and Chen, do not
4 reside on the island of Saipan.

5 DATED: Hagatna, Guam, April 23, 2024.

7 /s/ Charles H. McDonald II
8 CHUCK C. CHOI
9 ALLISON A. ITO
10 CHARLES H. MCDONALD II (F0494)
11 Proposed Attorneys for IMPERIAL PACIFIC
12 INTERNATIONAL (CNMI), LLC.
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Declaration of Chuck C. Choi

I. CHUCK C. CHOI, hereby declare as follows:

1. I am proposed counsel for the Debtor and have personal knowledge of the facts forth below. The "first day" motions identified in the Motion must be heard as soon as possible to, amongst other things (1) ensure representation of a corporate entity by counsel in this proceeding; (2) make payroll on May 3, 2024; and (3) borrow funds on an interim basis.

