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Attorneys for the Official Committee
of General Unsecured Creditors

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. 1:24-bk-00002

Chapter 11

**FIRST INTERIM FEE APPLICATION OF
CHAMBERS LAW LLC, LOCAL
COUNSEL TO THE OFFICIAL
COMMITTEE OF GENERAL
UNSECURED CREDITORS, FOR
ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM May 24, 2024
THROUGH SEPTEMBER 30, 2024;
DECLARATION OF KEITH CHAMBERS
II IN SUPPORT THEREOF**

Hearing Date, Time and Location (ChST):

Date: December 13, 2024

Time: 9:00 a.m.

Location: 1132 Bishop Street, Suite 250
Honolulu, HI 96813

Judge: Hon. Robert J. Faris

AFSDOCS:300558797.4



TO THE HONORABLE ROBERT J. FARIS, UNITED STATES BANKRUPTCY JUDGE; AND ALL INTERESTED PARTIES:

Chambers Law LLC (the “Firm”) hereby applies (the “Application”) to this Court for an order allowing, on an interim basis, \$3,575.00 as broken down below, for compensation for services rendered and expenses incurred as local counsel to 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 for the fee period from May 24, 2024 through and including September 30, 2024 (the “Fee Period”).

	Fees	Expenses	Total
Total to be Allowed on an Interim Basis for Period 5/24/24 – 9/30/24	\$3,575.00	\$0	\$3,575.00
Amount Previously Paid Per Interim Compensation Order	\$0	\$0.00	\$0
Total to be Paid on an Interim Basis	\$3,575.00	\$0	\$3,575.00

The Court has entered no prior orders allowing the Firm’s compensation or reimbursement of expenses in this chapter 11 case. Pursuant to the procedures established by the Compensation Procedure Order, the Firm has submitted monthly fee statements for May to July 2024 to Debtor and the OUST. There were no objections to these monthly fee statements. Concurrently, the Firm will submit its monthly fee statements for August and September 2024 to the OUST and Debtor. The Firm has not received any payment from the estate. Thus, by way of this Application, the Firm requests allowance of \$3,575.00 in fees and \$0 in costs on an interim basis incurred during the Fee Period.

The Firm has not been promised compensation for the services it rendered or the expenses that it incurred during the Fee Period. Furthermore, the Firm does not have any agreement or understanding of any kind to divide, pay over, or share any portion of the fees to be awarded to AFS with any other attorney except as among members and associates at AFS. The Firm reserves its right to supplement this Application at any time before or at the hearing on this Application.

In support of this Application, the Firm concurrently submits the declaration of Keith

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Chambers II (the “Chambers Declaration”), and respectfully represents as follows:

I.

INTRODUCTION

The Firm submits this Application pursuant to Section 330 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the United States District Court for the Northern Mariana Islands, the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, 20 C.F.R. Pt. 58, Appendix A* (“U.S. Trustee’s Guidelines”), and the *Order Establishing Interim Fee Application and Expense Reimbursement Procedures on a Final Basis* [ECF No. 149] (the “Compensation Procedure Order”).

Since its retention, the Firm as the local counsel to the Committee, rendered services to the Committee as requested and as appropriate in furtherance of the interests of unsecured creditors. The rate charged by the Firm is reasonable and comparable to those charged by other experienced and skilled professionals in similar situations. It is respectfully submitted that the services of the Firm were rendered in an expeditious and efficient manner and were beneficial to the Committee, the creditors, and the estate.

II.

BACKGROUND

A. General Background

On April 19, 2024 (the “Petition Date”), Debtor commenced this bankruptcy case (the “Case”) by filing a voluntary petition under chapter 11 of title 11 of the U.S. Code (the “Bankruptcy Code”). Debtor is continuing to manage its property as a debtor-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. Debtor is a limited liability company organized under the laws of the CNMI. Debtor obtained its exclusive casino license (the “Casino License”) for the island of Saipan and opened its operations in 2014. Debtor’s casino is primarily situated on property leased from the CNMI Department of Public Land (the “DPL”). The COVID-19 Pandemic forced the closure of the Debtor’s operations in March 2020. In April 2021, Debtor’s Casino License was suspended by the Commonwealth Casino Commission (the “CCC”) for

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1 nonpayment of fees and other alleged monetary defaults.

2 Debtor's primary real estate assets include (1) a hotel building currently under construction
3 with a casino, (2) a leasehold interest in approximately 19,204 square meters of land leased from
4 the DPL under Lease Agreement No. LA-15-002S (the "Leasehold Property"), and (3) Debtor's
5 ownership interest in Imperial Pacific Properties, LLC, which holds a leasehold interest in eight
6 lots adjacent to the Leasehold Property.

7 The Firm incorporates by reference the status of the Case and Committee's involvement as
8 detailed in the First Interim Fee Application of ArentFox Schiff LLP, General Bankruptcy Counsel
9 to the Official Committee of General Unsecured Creditors, for Allowance of Compensation and
10 Reimbursement of Expenses for the Period from May 16, 2024 Through September 30, 2024 [ECF
11 No. 296].

12 **B. Employment of the Firm as Local Counsel for the Committee**

13 On May 14, 2024, the Office of the United States Trustee ("OUST") appointed three (3)
14 members to the Committee pursuant to Section 1102 of the Bankruptcy Code. ECF No. 54. On
15 June 21, 2024, the Committee filed its application to employ the Firm as local counsel for the
16 Committee [ECF No. 133]. On July 8, 2024, the Court entered its order [ECF No. 163] granting
17 the application and approving the Firm's employment as local counsel to the Committee, effective
18 as of May 24, 2024. Upon the Committee's engagement of ArentFox Schiff LLP ("AFS") as its
19 general bankruptcy counsel and the Firm as its local counsel, AFS and the Firm have coordinated
20 to avoid any duplication of services provided to the Committee.

21 **C. Qualifications of the Firm**

22 The Committee has selected the Firm as its local counsel to advise the Committee on matters
23 of Commonwealth law. Keith Chambers II is the attorney responsible for providing services to the
24 Committee. Mr. Chambers is admitted to practice before this Court.

25 The rate charged by the Firm is comparable to those charged by other experienced and
26 skillful professionals in similar situations. Here, the hourly rate for the Firm during the Fee Period
27 was \$275.00. It is respectfully submitted that the services of the Firm were rendered in an
28 expeditious and efficient manner and have been beneficial to this estate and creditors.

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III.

COMPENSATION REQUESTED

A. Compensation Received to Date

The Compensation Procedure Order, entered by the Court on June 28, 2024, authorized the professionals employed in this case to serve monthly fee statements upon Debtor, the OUST, and the Committee on a monthly basis, and Debtor is authorized to pay 100% of the costs and 80% of the fees requested to the professionals if no written objection is served within 14 days of service of the monthly fee statement.

Pursuant to the procedures established by the Compensation Procedure Order, the Firm has filed monthly fee statements, as follows:

<i>Period Covered</i>	<i>Date Filed</i>	<i>Amount Billed</i>	<i>Amount Paid</i>	<i>Holdback</i>
May 24-July 31, 2024	Sept. 18, 2024	\$3,052.50	\$0	\$3,052.50
August 1-Sept. 30, 2024	Nov. 7, 2024	\$522.50	\$0	\$522.50
Total		\$3,575.00	\$0	\$3,575.00

With respect to the months from May to July 2024, there were no objections to these monthly fee statements. The Firm has not received payment on these undisputed fee statements. Concurrently, the Firm will submit its monthly fee statements for the months of August and September 2024 to the Debtor and the OUST. To date, an amount of \$3,575.00 remains outstanding from Debtor.

B. Compensation Requested for the Fee Period

By way of this Application, the Firm requests the Court enter an order on an interim basis: (a) allowing compensation to the Firm of \$3,575.00, representing \$3,575.00 in services rendered and \$0 in actual and necessary expenses incurred during the Fee Period; and (b) authorizing payment of the unpaid balance of such amounts, \$3,575.00, pursuant to this Application.

This is the Firm's first fee application for allowance of compensation and reimbursement of expenses. The Court has entered no prior orders allowing the Firm compensation and reimbursement of expense in this case, and the Firm received no retainer in connection with

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1 representing the Committee in this case. Except as set forth above, the Firm has received or been
 2 promised no compensation for the services that it rendered or the expenses that it incurred in this
 3 case. Furthermore, neither the Firm nor any member of the Firm has any agreement or
 4 understanding of any kind to divide, pay over, or share any portion of the fees to be awarded to the
 5 Firm with any other person or attorney.

6 IV.

7 SUMMARY OF EXHIBITS

8 In support of this Application, as required under the United States Trustee's guidelines, the
 9 Firm hereby submits Exhibits 1 through 3.

10 **Exhibit 1** is a summary, by activity category, of the services that the Firm rendered during
 11 the Fee Period.

12 **Exhibit 2** is a complete, chronological, line-item listing – sorted by activity category – of
 13 the services that the Firm rendered during the Fee Period. Exhibit 2 includes the name of the
 14 professional who rendered the services, the date the services were rendered, the hours spent
 15 rendering the service, the total billed for the service, and a detailed description of the services.

16 **Exhibit 3** is the professional biography of Mr. Chambers who worked on the case.

17 V.

18 SUMMARY OF SERVICES RENDERED

19 During the Fee Period, the Firm provided services to the Committee on a regular basis with
 20 respect to its obligation to protect the interests of the unsecured creditors and to preserve the estate's
 21 assets. As local counsel to the Committee, the Firm collaborated closely with AFS to ensure
 22 compliance with procedural requirements, including ECF registration and Pro Hac Vice
 23 applications for AFS professionals. The Firm also attended various hearings in person and
 24 monitored the case docket to keep the Committee and AFS informed. It is for these efforts that the
 25 Firm seeks allowance of compensation. This section summarizes, by activity category, the primary
 26 services that the Firm provided to the Committee. Because the Firm categorizes its services in
 27 numbered categories that are similar to those recommended in the United States Trustee's
 28 Guidelines, the discussions in this Section are organized by category.

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A. General – 00000

The Firm recorded time to this category related to coordinating with the Court and AFS concerning ECF registration. The total fees incurred by the Firm in the General category during the Fee Period was \$82.5 representing 0.3 hours of service in this category.

B. Petition, Schedules, First Day Orders – 00001

The Firm recorded time to this category related to litigating the DIP Loan Motion. Mr. Chambers reviewed the case docket concerning filing of the Committee's opposition to the DIP Loan Motion. He also attended all the hearings on the DIP Loan Motion and other related motions in person and reviewed the minute order for the DIP Loan Motion hearing.

The total fees incurred by the Firm in the Petition, Schedules, First Day Orders category during the Fee Period was \$1,622.50 representing 5.9 hours of service in this category.

C. Case Management and Operating Reports – 00002

The Firm recorded time to this category related to coordinating with AFS professionals regarding their *Pro Hac Vice* applications and the ECF registration for court document submissions. Mr. Chambers worked closely with AFS professionals to prepare the *Pro Hac Vice* applications and secure ECF registration. He also reviewed the orders granting these applications and provided updates to AFS.

The total fees incurred by the Firm in the Case Management and Operating Reports category during the Fee Period was \$770.00 representing 2.8 hours of service in this category.

D. Committee and Debtor Communications, Conference Calls – 00005

The Firm recorded time to this category related to conference with the Committee regarding the case status and the pending matters. The total fees incurred by the Firm in the Committee and Debtor Communications, Conference Call category during the Fee Period was \$137.50 representing approximately 0.5 hours of service in this category.

E. Creditor Inquiries – 00007

The Firm recorded time to this category related to addressing inquiries from an unsecured creditor. Mr. Chambers directed the creditor's counsel to AFS for further details regarding the filing of a proof of claim and the status of the case.

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The total fees incurred by the Firm in the Creditor Inquiries category during the Fee Period was \$27.5 representing approximately 0.1 hours of service in this category.

F. Miscellaneous Motions and Objections – 00011

The Firm spent time in this category in filing the *Pro Hac Vice* applications for AFS professionals, along with the corresponding proposed orders. The Firm also recorded time for participating in the meeting with the Committee to prepare for the hearing on the Conversion Motion, as well as for attending the hearing itself. The total fees incurred by the Firm in the Miscellaneous Motions and Objections category during the Fee Period was \$632.50 representing 2.3 hours of service in this category.

G. Fee Applications – 00014¹

The Firm recorded a limited amount of time to this category related to preparing and filing the employment application, as well as the supporting declarations, exhibits, and related orders, for in this case. The Firm conducted a thorough review to identify any connections with the case and ensure that all necessary details were accurately disclosed in the application. Additionally, the Firm reviewed and finalized the employment application for submission.

The total fees incurred by the Firm in the Fee Applications category during the Fee Period was \$302.50 representing 1.1 hours of service.

VI.

STATUTORY BASIS FOR COMPENSATION

The statutory predicates for the relief sought herein are 11 U.S.C. Sections 330 and 331, as supplemented by Federal Rule of Bankruptcy Procedure 2016. The Firm seeks compensation for actual, necessary professional services rendered and reimbursement of reasonable expenses incurred on behalf of the Committee during the Fee Period.

Section 330(a)(1) of the Bankruptcy Code allows for the following: (A) reasonable compensation for actual, necessary services rendered by [an] attorney and by any paraprofessional person employed by such [attorney]; and (B) reimbursement for actual, necessary expenses.

¹ The Firm's time related to its employment application were inadvertently recorded under this category but should have been recorded under the "Professional Retention – 00013" category.

1 Section 330(a)(3)(A) of the Bankruptcy Code provides that,

2 [i]n determining the amount of reasonable compensation to be
 3 awarded . . . the court shall consider the nature, the extent, and the
 4 value of such services, taking into account all relevant factors,
 5 including (A) the time spent on such services; (B) the rates charged
 6 for such services; (C) whether the services were necessary to the
 7 administration of, or beneficial at the time at which the service was
 8 rendered toward the completion of, a case under [Title 11]; (D)
 9 whether the services were performed within a reasonable amount of
 time commensurate with the complexity, importance, and nature of
 the problem, issue, or task addressed; (E) with respect to a
 professional person, whether the person is board certified or
 otherwise has demonstrated skill and experience in the bankruptcy
 field; and (F) whether the compensation is reasonable based on the
 customary compensation charged by comparably skilled
 practitioners in cases other than cases under this title [11].²

10 Congress intended that bankruptcy attorneys be compensated at the market rate for
 11 comparable services in non-bankruptcy cases. *See In re Ames Dep't Stores, Inc.*, 76 F.3d 66, 71
 12 (2d Cir. 1996) (*citing In re UNR Indus., Inc.*, 986 F.2d 207, 208–09 (7th Cir. 1993)). The policy of
 13 11 U.S.C. Section 330 is to ensure that qualified attorneys will “not be deterred from taking
 14 bankruptcy cases due to a failure to pay adequate compensation.” *Id.* at 210.

15 The Court’s examination of the reasonableness of services rendered must be conducted in
 16 an “objective manner, based upon what services a reasonable lawyer or legal firm would have
 17 performed” *Ames Dep't Stores*, 76 F.3d at 72 (*citing In re Matter of Taxman Clothing Co.*,
 18 49 F.3d 310, 315 (7th Cir. 1995)).

19 The Firm believes that its billing rates in this chapter 11 case, which reflect the Firm’s
 20 customary billing rate, is “reasonable billing rate” for purposes of this Court’s determination of the
 21 “reasonableness” of the fees for services rendered. The Firm’s customary billing rate was disclosed
 22 in the retention papers and approved by this Court.

23 The rate charged by the Firm is reasonable and are consistent with customary rates charged
 24 by similar law firms. Indeed, it is submitted that the rate charged is significantly less than many
 25 firms providing similar services. If the case was not a case under the Bankruptcy Code, the Firm
 26 would charge and expect to receive, on a current basis, an amount at least equal to the amounts
 27 requested herein for professional services.

28 ² 11 U.S.C. § 330(a)(3).
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VII.


CONCLUSION

In accordance with 11 U.S.C. Section 330, the Firm submits that the amounts requested herein are fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. The Firm further submits that pursuant to the criteria normally examined in bankruptcy cases, and based upon the factors considered in accordance with 11 U.S.C. Section 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the results achieved provide more than sufficient justification for approval of the compensation sought by the Firm.

WHEREFORE, the Firm respectfully requests that the Court enter an order on an interim basis: (a) allowing compensation to the Firm of \$3,575.00, representing \$3,575.00 in services rendered and \$0 in actual and necessary expenses incurred during the Fee Period; and (b) authorizing the Debtor to pay, at this time, \$3,575.00 to the Firm for services rendered to the Committee.

Dated: November 7, 2024

CHAMBERS LAW LLC

By: 
Keith Chambers II
Local Counsel for Official Committee of
General Unsecured Creditors

DECLARATION OF KEITH CHAMBERS II

I, Keith Chambers II, declare that:

1. I am a sole practitioner and attorney licensed and admitted to practice before the United States District Court for the Northern Mariana Islands, Bankruptcy Division. I maintain an office for the practice of law at Chambers Law LLC (the “Firm”), Marianas Business Plaza, Suite 409, Saipan, MP 96950.

2. I am fully familiar with the facts hereinafter stated, and I am authorized to and hereby make this declaration (the “Declaration”) on behalf of the Firm. The information contained in this Declaration is of my own personal knowledge or my review of the files in this Case.

3. The Firm is the local counsel to the Committee. I submit this Declaration in support of the *First Interim Fee Application of Chambers Law LLC, Local Counsel to the Official Committee of General Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from May 24, 2024 through September 30, 2024* (the “Fee Application”).

4. I have reviewed the Fee Application. The factual allegations in support of the Fee Application are set forth in Sections I and IV of the Fee Application and are incorporated herein by this reference. These factual recitations are true and correct to the best of my knowledge, information and belief.

5. The amounts being requested are billed at rates no less favorable than those customarily employed by the applicant and generally accepted by the applicant’s non-bankruptcy clients.

6. I am familiar with the Guidelines of the Office of the United States Trustee. To my best knowledge, information, and belief, the Fee Application conforms to the U.S. Trustee’s Guidelines, the Local Bankruptcy Rule 2016-1, and any order of the Court, except as specifically noted herein.

7. As the billing attorney in this case, I carefully reviewed each monthly bill and carefully evaluated each and every billing entry.

8. Attached hereto as **Exhibit 1** is a summary, by activity category, of the services that the Firm rendered during the Fee Period.

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9. Attached hereto as **Exhibit 2** is a complete, chronological, line-item listing – sorted by activity category – of the services that the Firm rendered during the Fee Period. Exhibit 2 includes the name of the professional who rendered the services, the date the services were rendered, the hours spent rendering the service, the total billed for the service, and a detailed description of the services.

10. Attached hereto as **Exhibit 3** is professional biography of Mr. Chambers who worked on the case.

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

Executed this Thursday, November 07, 2024, at Saipan, Northern Mariana Islands.

Keith Chambers II

EXHIBIT 1

Code	Hours
0000	0.3
0001	5.9
0002	2.8
0005	0.5
0007	0.1
00011	2.3
00014	1.1

EXHIBIT 2

Chambers Law LLC

Suite 409, Marianas Business Plaza, Nauru Loop * PMB 919 Box 10000 * Saipan, MP 96950
Email: keith.chambers@chamberslawcnmi.com * Tel No: (670)234-9005/6 * Fax No: (670)234-9007

Invoice: 0624-03

Date: 7/2/2024

Client: Arent Fox - 1:24-bk-00002
Saipan, MP 96950

Attorney Billable Hours for May - July 2024			
Date	Task	Time	Subtotal
5/25/2024	Meeting with AFS re case management matters.	0.4	\$110.00
5/26/2024	Respond to email from C Wong re pro hac vice applications.	0.2	\$55.00
5/26/2024	Meeting with C Wong and Y Li re filing of opposition and pro hac vice applications	0.3	\$82.50
5/26/2024	Email the court re ECF registration.	0.1	\$27.50
5/27/2024	Respond to Y Li re e-filing status.	0.1	\$27.50
5/27/2024	Provide update to AFS re pending ECF registration.	0.1	\$27.50
5/28/2024	Meeting with AFS re pro hac vice applications.	0.2	\$55.00
5/28/2024	Review of docket to confirm filing of opposition to DIP motion, and update AFS.	0.2	\$55.00
5/28/2024	Filed Motion to Appear Pro Hac	0.2	\$55.00
5/28/2024	Filed Proposed Order to Appear Pro Hac	0.2	\$55.00
5/28/2024	Provide email update to AFS re filing of pro hac vice applications.	0.2	\$55.00
5/28/2024	Call with C Wong re next steps.	0.2	\$55.00
5/30/2024	Court Appearance for Hearing on the Motion for expense procedure, Diploan procedure, and review from stay motion	3.3	\$907.50
5/30/2024	Review of orders granting pro hac vice applications and provide update to AFS	0.2	\$55.00
5/31/2024	Review of minute order from hearing.	0.1	\$27.50
6/5/2024	Review of draft employment application; and provide responses to questions from Y Li	0.2	\$55.00
6/6/2024	Meeting with Attorneys via MS Teams	0.4	\$110.00
6/11/2024	Examined Email from Creditor Inquiry	0.1	\$27.50
6/13/2024	Reviewed Declaration for employment	0.5	\$137.50
6/15/2024	Final review of employment application and declaration and approve for filing.	0.2	\$55.00
6/18/2024	Exchange emails with Y Li re filing of employment application.	0.2	\$55.00
6/27/2024	Court Appearance for Hearing on the Diploan Motion and Review from stay motion	1.1	\$302.50
6/29/2024	Meeting with Attorneys and Clients via MS Teams regarding filing opposition to the conversion motion	0.5	\$137.50
7/10/2024	Meeting with Sophia regarding expense procedures and submitting invoices	0.9	\$247.50

7/18/2024	Court Appearance for Hearing on the Motion for the renewed relief from stay and Motion to excuse compliance regarding Clear's retention of vehicles	1	\$275.00
	Fees		\$0.00
Total:			11.1 \$3,052.50

Terms and Conditions:

- Make all checks payable to Chambers Law LLC.

0000 General

Date	Timekeeper	Narrative	Hours	Value
May 26, 2024	Keith Chambers II	Email the court re ECF registration	0.1	\$27.50
May 28, 2024	Keith Chambers II	Call with C Wang re next steps	0.2	\$55.00

0001 Petition, Schedules, First day Orders

Date	Timekeeper	Narrative	Hours	Value
May 28, 2024	Keith Chambers II	Review of docket to confirm Filing of opposition to DIP motion, And update AFS	0.2	\$55.00
May 30, 2024	Keith Chambers II	Court appearance for hearing on The Motion for expense procedure, Diploan procedure, and review from Stay motion	3.3	\$907.50
May 30, 2024	Keith Chambers II	Review of orders granting pro Hac vice applications and Provide update to AFS	0.2	\$55.00
May 31, 2024	Keith Chambers II	Review of minute order from hearing	0.1	\$27.50
June 27, 2024	Keith Chambers II	Court Appearance for Hearing On the Diploan Motion and Review from stay motion	1.1	\$302.50
July 18, 2024	Keith Chambers II	Court Appearance for Hearing On the Motion for the renewed Relief from stay and Motion to Excuse compliance regarding Clear's retention of vehicles	1.0	\$275.00

0002 Case Management and Operating Reports

Date	Timekeeper	Narrative	Hours	Value
May 25, 2024	Keith Chambers II	Meeting with AFS re case management matters	0.4	\$110.00
May 26, 2024	Keith Chambers II	Respond to email from C Wong re pro hac vice applications	0.2	\$55.00
May 26, 2024	Keith Chambers II	Meeting with C Wong and Y Li	0.3	\$82.50

		re filing of opposition and pro hac vice applications		
May 27, 2024	Keith Chambers II	Respond to Y Li re efling status	0.1	\$27.50
May 27, 2024	Keith Chambers II	Provide update to AFS re pending ECF registration	0.1	\$27.50
May 28, 2024	Keith Chambers II	Meeting with AFS re pro hac vice Applications	0.2	\$55.00
May 28, 2024	Keith Chambers II	Provide email update to AFS of Pro hac vice appliations	0.2	\$55.00
June 06, 2024	Keith Chambers II	Meeting with Attorneys via MS Teams	0.4	\$110.00
July 10, 2024	Keith Chambers II	Meeting with Sophia via MS Teams	0.9	\$247.5

0005 Committee and Debtor Communications, Conference Calls

Date	Timekeeper	Narrative	Hours	Value
June 29, 2024	Keith Chambers II	Meeting with Attorneys and Clients via MS Teams	0.5	\$137.50

0007 Creditor Inquiries

Date	Timekeeper	Narrative	Hours	Value
June 11, 2024	Keith Chambers II	Examined Email attorney Jose Mafnas re a creditor inquirey	0.1	\$27.50

00011 Miscellaneous Motions and Objections

Date	Timekeeper	Narrative	Hours	Value
May 28, 2024	Keith Chambers II	Filed Motion to Appear Pro Hac	0.2	\$55.00
May 28, 2024	Keith Chambers II	Filled Proposed Order to Appear Pro Hac	0.2	\$55.00

00014 Fee Applications

Date	Timekeeper	Narrative	Hours	Value
June 05, 2024	Keith Chambers II	Review of draft employment Application; and provide	0.2	\$55.00

Responses to questions from Yi				
June 13, 2024	Keith Chambers II	Reviewed Declaration for Employment	0.5	\$137.50
June 15, 2024	Keith Chambers II	Final review of employment Application and declaration And approve for filing	0.2	\$55.00
June 18, 2024	Keith Chambers II	Exchange emails with Y Li re Filing of employment application	0.2	\$55.00

00011 Miscellaneous Motions and Objections

Date	Timekeeper	Narrative	Hours	Value
August 13, 2024	Keith Chambers II	Meeting with committee attorneys Attorneys re case Conversion motion	0.4	\$110.00
August 14, 2024	Keith Chambers II	Court Appearance for Hearing On Conversion Motion for the renewed Relief from stay and Motion to Excuse compliance regarding Clear's retention of vehicles	1.5	\$412.50

EXHIBIT 3

KEITH CHAMBERS II

(670) 588-7384 · kdchambersii@gmail.com · PMB 919 Box 10000, Saipan, MP 96950

Education

THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL, Washington, DC
J.D., with High Honors, May 2016

- GPA: 3.755, Order of the Coif

THE FLORIDA STATE UNIVERSITY, Tallahassee, FL
B.A., *summa cum laude*, in History, International Affairs, and Social Sciences, May 2013

- GPA: 3.992

Professional Experience

Chambers Law LLC, Saipan, MP

Attorney

February 2023 – Present

Commonwealth Superior Court, Saipan, MP

Law Clerk for the Honorable Joseph N. Camacho

February 2022 – January 2023

- Drafted published orders in response to motions submitted to the Court

Office of the Attorney General, Saipan, MP

Assistant Attorney General

January 2021 – January 2022

- Researched and analyzed Commonwealth regulations to respond to legal services requests

Commonwealth Superior Court, Saipan, MP

Law Clerk for the Honorable Joseph N. Camacho

January 2019 – January 2021

- Drafted over thirty (30) published orders in response to motions submitted to the Court
- Created a search and seizure PowerPoint presentation used for law enforcement training

Law Counsel, Washington, DC

Document Review Attorney

September 2018 – December 2018

D.C. Department of Consumer and Regulatory Affairs, Washington, DC

Pro Bono Attorney Advisor

April 2018 – July 2018

Attorney Advisor Fellow

March 2017 – March 2018

- Unilaterally argued cases before administrative law judges on behalf of the agency
- Negotiated settlement agreements to obtain a favorable outcome for the agency

The George Washington University Law School

Health Rights Law Clinic, Washington, DC

Student Attorney

Fall 2015

- Advised clients about their Medicare and Medicaid rights and choosing healthcare plans

Milken Institute School of Public Health, Washington, DC

Legal Research Assistant

Summer 2015

- Analyzed proposed benchmark plans to verify Affordable Care Act compliance

U.S. Securities and Exchange Commission, Washington, DC

Intern, Division of Corporation Finance

Spring 2015

- Researched the impact of energy regulations on the SEC's reporting requirements

NuMedCare, LLC, Boca Raton, FL

Compliance Officer

Summer 2014

- Researched Food, Drug, and Cosmetic Act and HIPAA compliance requirements

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, I caused the forgoing documents 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 pleadings and all attachments thereto have been served on all counsel of record via the Court's CM/ECF System.

Executed this 7th day of November, 2024.

/s/ Aram Ordubegian

Aram Ordubegian

