

1 Bruce Berline
2 LAW OFFICE OF BRUCE BERLINE, LLC
3 Security Title Building
4 Isa Drive, Capitol Hill
5 PO Box 5682 CHR
6 Saipan, MP 96950
7 Tel.: (670) 233-3663
8 Fax: (670) 233-5262
9 Email: bberline@gmail.com

7 Aaron Halegua
8 AARON HALEGUA, PLLC
9 524 Broadway, 11th Floor
10 New York, New York 10012
11 Tel.: (646) 854-9061
12 Email: ah@aaronhalegua.com

11 John-Patrick M. Fritz
12 LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
13 2818 La Cienega Ave.
14 Los Angeles, CA 90034
15 Tel: (310) 229-3395
16 Email: jpf@lnbyg.com

15 Attorneys for Joshua Gray

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN MARIANA ISLANDS**
19 **BANKRUPTCY DIVISION**

20 In re

21 IMPERIAL PACIFIC INTERNATIONAL
22 (CNMI), LLC,

23 Debtor and
24 Debtor-in-Possession.

Case No. 1:24-bk-00002

**DECLARATION AND REQUEST FOR
ENTRY OF ORDER ON MOTION BY
JUDGMENT CREDITORS
JOSHUA GRAY AND U.S.A. FANTER
TO DISTRIBUTE PROCEEDS
FROM AUCTION OF IPI'S VEHICLES**

Hearing Date: January 31, 2025
Hearing Time: 9:00 a.m. ChST
Judge: Hon. Robert J. Faris



1 I, AARON HALEGUA, hereby declare:

2 1. I am over eighteen years of age and am fully competent to testify to the facts set forth in this
3 declaration.

4 2. I represent secured judgment creditor Joshua Gray in these proceedings.

5 3. On December 13, 2024, secured judgment creditors Gray and Fanter filed a Motion to
6 Distribute Proceeds from the Auction of IPI's Vehicles. (ECF No. 327 (the "Motion")).¹

7 4. A Notice of Hearing was filed stating that a hearing would take place on January 31, 2025,
8 and that any objections or opposition must be filed on or before December 30, 2024. (ECF No. 329).

9 5. A Certificate of Service for the Motion and Notice of Hearing was also filed. (ECF No. 330).

10 6. Pursuant to Local Bankruptcy Rule 9013-1(c)(3), if no party files a timely response to a
11 motion, the moving party may file a declaration and submit a proposed order granting the motion.
12 Here, no party has submitted any timely opposition to the Motion, nor has any party contacted me to
13 express any opposition or objection.

14 7. It is also appropriate to grant the Motion and vacate the hearing because the Motion was
15 supported by a Stipulation executed by the Debtor, the Committee, the CNMI, and other secured
16 creditors. *See* LBR 9013-1(c)(4)(D).

17 8. Accordingly, the Movants request that the Motion be granted and that hearing set for January
18 31, 2025 be vacated. A proposed order will be submitted to the Court via email.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed in Chiang Mai, Thailand on this 3rd day of January, 2025.

21
22
23
24
25
26 _____
27 /s/
28 Aaron Halegua

¹ Unless otherwise noted, the defined terms used herein have the same meaning as in the Motion.