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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

STIPULATION TO EXTEND BRIEFING DEADLINES ON JOINT MOTION OF DEBTOR AND OFFICIAL COMMITTEE OF GENERAL UNSECURED CREDITORS FOR ORDER (I) APPROVING THE SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363, SUBJECT TO OVERBIDS; AND (II) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND CURE AMOUNTS ASSOCIATED THEREWITH



Hearing Date: March 25, 2025
Hearing Time: 9:00 a.m. (ChSt)
Judge: Hon. Robert J. Faris

Secured creditors Joshua Gray (“Gray”), the Commonwealth of the Northern Mariana Islands (the “CNMI”) (together, the “Secured Creditors”), the Official Committee of General Unsecured Creditors (the “Committee”), and the debtor and debtor in possession Imperial Pacific International (CNMI), LLC (the “Debtor”) (together, the “Parties”), through their counsel, hereby stipulate and agree:

1. The deadline for Gray and the CNMI to file a response or objection, if any, to the *Joint Motion of Debtor and Official Committee of General Unsecured Creditors for Order (I) Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of All Liens, Claims, and Encumbrances Pursuant to 11 U.S.C. § 363, Subject to Overbids; and (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Cure Amounts Associated Therewith* (the “Motion”) [ECF 367], shall be extended from March 5, 2025, at 6:00 p.m. (ChSt), to March 11, 2025, at 11:59 p.m. (ChST).

2. The deadline for the Debtor and Committee to file a reply to the Secured Creditors’ responses and objections (if any) to the Motion shall be March 18, 2025, at 11:59 p.m. (ChST).

3. The hearing on the Sale Motion shall remain on March 25, 2025, at 9:00 a.m. (ChST), or such later and further date as is convenient with the Court’s schedule if rescheduled by the Court.

