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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

NOTICE OF MOTION AND EMERGENCY
MOTION BY SECURED CREDITOR
JOSHUA GRAY TO EXCEED PAGE LIMIT
UNDER LOCAL RULE 7.1(f)

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



1 Gray moves this Court, pursuant to LBR 9013-1(a) and L.R. 7.1(f)(4), and based on the
2 Declaration of Aaron Halegua, dated March 10, 2025, for permission to file an opposition brief to the
3 *Joint Motion of Debtor and Official Committee of General Unsecured Creditors for Order (I)*
4 *Approving the Sale of Substantially All of the Debtor's Assets Free and Clear of All Liens, Claims,*
5 *and Encumbrances Pursuant to 11 U.S.C. § 363, Subject to Overbids; and (II) Authorizing the*
6 *Assumption and Assignment of Certain Executory Contracts and Cure Amounts Associated Therewith*
7 (ECF No. 367) that is up to thirty (30) pages in length, exclusive of the table of contents and table of
8 authorities. Pursuant to Local Rule 7.1(a)(3)(G), no hearing is required to decide this motion.
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12 DATED: March 10, 2025

13
14 Respectfully submitted,

15 _____
16 /s/ _____
17 Aaron Halegua
18 Bruce Berline
19 John-Patrick M. Fritz

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Attorneys for Joshua Gray

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18 **FOR THE NORTHERN MARIANA ISLANDS**
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20 In re

21 IMPERIAL PACIFIC INTERNATIONAL
22 (CNMI), LLC,

23 Debtor and
24 Debtor-in-Possession.

Case No. 1:24-bk-00002

**DECLARATION OF AARON
HALEGUA IN SUPPORT OF EMERGENCY
MOTION TO EXCEED PAGE LIMIT
UNDER LOCAL RULE 7.1(f)**

Hearing Date: March 25, 2025

Hearing Time: 9:00 a.m.

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 creditor Joshua Gray (“Gray”) in the above-captioned matter, and submit
5 this declaration in support of Gray’s motion to permit him to file an opposition brief of up to 30 pages
6 in response to the *Joint Motion of Debtor and Official Committee of General Unsecured Creditors*
7 *for Order (I) Approving the Sale of Substantially All of the Debtor’s Assets Free and Clear of All*
8 *Liens, Claims, and Encumbrances Pursuant to 11 U.S.C. § 363, Subject to Overbids; and (II)*
9 *Authorizing the Assumption and Assignment of Certain Executory Contracts and Cure Amounts*
10 *Associated Therewith* (ECF No. 367 (the “Motion”)).

11 3. Based on my understanding of the relevant rules, namely LBR 9013-1(a) and L.R. 7.1(f)(4),
12 Gray’s opposition brief is normally limited to 25 pages.

13 4. This opposition brief needs to address a variety of issues involved in the Motion, including
14 but not limited to procedural objections to the sale process, substantive objections to the sale, the
15 denial of access to information about the Debtor’s assets, the denial of Gray’s credit bid, the
16 interrelationship of the Debtor and the only two bidders; potential bidders excluded from the process;
17 the request to approve the sale “free and clear” of Gray’s lien; the breakup fee; and, the Motion’s
18 request to eliminate the 14-day stay period. Moreover, Gray’s opposition will actually incorporate
19 the experiences and concerns of several parties who object to the sale and are expected to later join
20 in the opposition. For these reasons, it is possible that the excess pages will be necessary.

21 5. At this stage, I cannot say with certainty the precise number of pages needed for the opposition
22 because we are still receiving highly relevant information. For instance, only yesterday did Gray
23 finally receive access to the Data Room containing information about the Debtor’s assets that was
24 shown to other bidders. Only today did I receive a copy of the winning bid proposal submitted by
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1 Team King Investment (CNMI), LLC (“Team King”) and see the representations made by Team King
2 regarding its relationships with the Debtor.

3
4 6. As more than 25 pages may be needed to adequately address all relevant issues, Gray therefore
5 is requesting permission to file a brief, exclusive of the table of contents and table of authorities, that
6 is up to 30 pages in length. If granted, Gray will nonetheless make every effort to keep the objection
7 as concise as possible.

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10 I declare under penalty of perjury that the foregoing is true and correct. Executed in New
11 York, New York on the 10th day of March, 2025.

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13 _____
14 /s/ Aaron Halegua

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