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11 Attorneys for Team King Investment (CNMI) LLC,
Successful Bidder

12 **IN DISTRICT COURT OF THE NORTHERN MARIANA ISLANDS**

14 In re:	Case No. 1:24-bk-00002
15 IMPERIAL PACIFIC INTERNATIONAL (CNMI) LLC,	Chapter 11
16 Debtor and Debtor in Possession.	MOTION TO SHORTEN TIME UNDER LOCAL RULE 7.1 (f)
19 Judge: Hon. Robert J. Faris	

20 **MOTION TO SHORTEN TIME**

21 Counsel for Team King Investment (CNMI), LLC ("Team King"),
22 successful bidder herein, hereby moves the Court pursuant to Local Rule 7.1
23 (f), and the Court's inherent power to manage its docket, for an order
24



1 shortening the time for Team King's Motion to Quash Notice of Remote
2 Deposition filed with the Court on March 13, 2025.

3 This Motion is based on the accompanying Memorandum of Points and
4 Authorities, the record of the proceedings and papers on file herein together
5 with and all arguments to be presented at the hearing on the above Motion.

6 Dated this 13th day of March, 2025.

7 Law Offices of Louie J. Yanza, P.C.
8 Attorneys for
9 Team King Investment (CNMI), LLC

10 By: 
11 _____

12 Louie J. Yanza

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 This motion is made pursuant to Rule 7.1 (f) of the U.S. District Court for
15 the Northern Mariana Islands Local Rules. Due to the exigent circumstances of
16 this case, there is good cause to shorten time and allow for an expedite briefing
17 and hearing schedule on Team King's Motion to Quash Notice of Remote
18 Deposition for March 18, 2025.

19 The parties have not made any previous request to shorten time. The
20 reasons for the motion are twofold. First, due to previously scheduled travel by
21 Team King's principal, Hiroshi Kaneko, as well as counsel for Team King's
22 scheduled hearings in multiple courts, the proposed date of March 18, 2025, is
23 simply not available. Second, the hearing to confirm the sale of Imperial Pacific
24 International, LLC's assets to Team King is scheduled for March 25, 2025.
25 There is no available day or time to conduct the deposition of Team King before
26

1 the sale confirmation hearing. Unless time is shortened, this dispute will likely
2 complicate the confirmation of the sale.

3 Should the Court grant the Motion to Shorten Time, it will not impact
4 any deadlines previously set. In fact, shortening time will allow the parties,
5 with assistance from the Court, to resolve this dispute prior to the March 25,
6 2025 sale confirmation hearing.

7 **MEET AND CONFER CERTIFICATION**

8 I HEREBY CERTIFY that myself, with full authority to resolve this
9 discovery dispute, had a substantive conversation in person or by telephone
10 with opposing counsel Aaron Halegua in a good faith effort to resolve this
11 motion before the motion was noticed for hearing, but the parties were unable
12 to reach an agreement. Aaron Halegua, counsel for creditor Joshua Gray has
13 agreed to hear the Motion to Quash on Monday, March 17, 2025 however,
14 Robert Glass, counsel for CNMI, has not responded to my request to have the
15 motion heard on March 17, 2025.
16

17 I FURTHER HEREBY CERTIFY I had a conversation with opposing
18 counsel

- 19 1. Aaron Halegua on Monday, March 10, 2025 at 1:55 pm;
20 2. Aaron Halegua and Robert Glass on Wednesday, March 12, 2025 at
21 7:30 am.
22 3. Aaron Halegua on Wednesday, March 12, 2025 at about 2:30 p.m.

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CONCLUSION

Based upon the foregoing, Counsel for Team King respectfully requests that the Court grant its Motion to Shorten Time.

Respectfully submitted this 13th day of March, 2025.

Law Office of Louie J. Yanza, P.C.
Attorney for Team King Investment
(CNMI), LLC

By:



Louie J. Yanza