

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

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

19 In re

20 IMPERIAL PACIFIC INTERNATIONAL
21 (CNMI), LLC,

22 Debtor and
23 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: April 29, 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. On April 1, 2025, the Court approved a Stipulation by the Parties moving the hearing date on 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] to April 29, 2025 at 9:00 a.m. (ChST) and extending the briefing deadlines.

2. Settlement discussions between the Parties to resolve the Secured Creditors’ objections to the Motion are ongoing and progressing, but have not yet been finalized.

3. Accordingly, the Parties agree that the deadline for Gray and the CNMI to file any supplemental oppositions to the Motion shall be extended from April 15, 2025, to April 19, 2025, at 12:00 p.m. (ChST).

4. All other deadlines and the hearing date shall remain unchanged.

1 Dated: April 14, 2025

2
3 SIGNATURES:

4 /s/

5 Aaron Halegua
6 Bruce Berline
7 John-Patrick M. Fritz
8 *Attorneys for Judgment Creditor Gray*

9 /s/

10 J. Robert Glass, Jr.
11 *Attorney for the CNMI*

12 /s/

13 Aram Ordubegian
14 *Attorney for the Official Committee of*
15 *General Unsecured Creditors*

16 /s/

17 Chuck Choi
18 *Attorney for the Imperial Pacific International (CNMI), LLC*

19
20
21
22
23
24
25
26
27
28