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Attorneys for the Official Committee  
of General Unsecured Creditors

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

In re:

**IMPERIAL PACIFIC  
INTERNATIONAL (CNMI) LLC,**

Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**MOTION FOR AN ORDER TO (1)  
EXCUSE CHAMBERS LAW LLC FROM  
APPEARING AT STATUS CONFERENCE  
AND HEARING ON MOTION FOR  
RELIEF FROM STAY SCHEDULED FOR  
AUGUST 21, 2025, OR (2)  
ALTERNATIVELY, TO APPEAR VIA  
VIDEO CONFERENCE**

Hearing Date, Time and Location (ChST):

Date: August 21, 2025  
Time: 9:00 a.m.  
Location: 3rd Floor Courtroom 1671  
Gualo Rai Rd., Gualo Rai  
Saipan, MP 96950

**Judge:** Hon. Robert J. Faris

**TO THE HONORABLE ROBERT J. FARIS, UNITED STATES BANKRUPTCY  
JUDGE:**



Chambers Law LLC, as the local counsel for the Official Committee of General Unsecured Creditors (the “Committee”) of Imperial Pacific International (CNMI), LLC, the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 case, hereby respectfully requests for an order from the Court to excuse its appearances at the status conference and hearing on motion for relief from stay scheduled for August 21, 2025 at 9:00 a.m. ChST (the “Hearings”).

The Committee retained ArentFox Schiff LLP (“AFS”) as its general bankruptcy counsel.<sup>1</sup> On May 29, 2024, AFS professionals Aram Ordubegian and Christopher Kwan Shek Wong were duly admitted *pro hac vice* to practice in the United States District Court for the Northern Mariana Islands. *See* ECF Nos. 94 and 95. The Committee retained Chambers Law LLC as the associated local counsel. Keith Chambers II is a sole practitioner and attorney licensed and admitted to practice before the United States District Court for the Northern Mariana Islands, Bankruptcy Division.

Local Rule of United States District Court for the Northern Mariana Islands, section 83.5, subsection 4.B.iii, provides that “[l]ocal counsel must attend all proceedings related to the case for which counsel is accosted unless excused by this Court.” Here, Mr. Chambers seeks for the Court’s approval to excuse him from attending the Hearings due to the fact that Mr. Chambers will be off island during the day of the Hearings. Consequently, Mr. Chambers seeks the Court’s approval to be excused from attending the Hearings.

Therefore, Mr. Chambers respectfully requests the Court that he be excused from attending the Hearings, or alternatively, to be allowed to attend via video conference.

Dated: August 12, 2025

**CHAMBERS LAW LLC**

By: 

Keith Chambers II  
Local Counsel for Official Committee  
of General Unsecured Creditors

<sup>1</sup> AFS professionals will participate in the status conference and hearing on motion for relief from stay scheduled for August 21, 2025 at 9:00 a.m. ChST via video conference, as approved by the Court’s orders. *See* ECF Nos. 127 and 128.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2025, I caused the forgoing document to be filed with the Clerk of Court for the United States District Court for the Northern Mariana Islands, Bankruptcy Division, using the CM/ECF System. A true and correct copy of the said pleading has been served on all counsel of record via the Court's CM/ECF System.

Executed this 12th day of August, 2025.

/s/ Christopher K.S. Wong  
CHRISTOPHER K.S. WONG