

**Joey P. San Nicolas**

Attorney-at-Law  
San Nicolas Law Office, LLC  
3813 Mestisa Ave. Dandan Village  
P.O. Box 505335  
Saipan, MP 96950  
Tel: (670) 288-1073  
Email: [jpsn@sannicolaslaw.net](mailto:jpsn@sannicolaslaw.net)

Attorney for Loi Lam Sit

**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

**MOTION TO EXCUSE LOCAL COUNSEL  
JOEY P. SAN NICOLAS AND ALLOW  
PRO HAC VICE COUNSEL  
CHRISTOPHER J. MUZZI TO APPEAR  
WITHOUT LOCAL COUNSEL**

Date: August 21, 2025  
Time: 9:00 a.m.  
Judge: Hon. Robert J. Faris

COMES NOW, the undersigned local counsel, JOEY P. SAN NICOLAS, Esq., on behalf of his client, Loi Lam Sit, to request an order from the Court to allow counsel to be excused from the status conference set for August 21, 2025 at 9:00 a.m. before Judge Robert J. Faris and allow *Pro Hac Vice* counsel, Christopher J. Muzzi, Esq., to appear without local counsel.

It is respectfully submitted that good cause exists for the requested order on the grounds that undersigned Counsel is scheduled to appear at a hearing at the CNMI Superior Court at the same date and time as the status conference in this case. Mr. Muzzi is intimately aware of the issues before this Court and will be present at the hearing via video teleconference.

Respectfully submitted this 15<sup>th</sup> day of August, 2025.



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/s/Joey P. San Nicolaoas  
Joey P. San Nicolas  
*Attorney for Loi Lam Sit*