

VINCENT J. SEMAN
SEMAN LAW OFFICES, LLC
P.O. Box 10001 PMB 168
Saipan, MP 96950
Telephone: (670) 323-2115
E-mail: vjseman@semanlaw.com
Attorneys for Saipan Stevedore Company, Inc.

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

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

**CASE NO. 24-BK-00002
CHAPTER 11**

Debtor and Debtor in Possession,

**Updated Declaration of Lee Cabrera in
Support of Motion for Administrative
Expenses**

I, Lee Cabrera, hereby declare, under penalty of perjury, as follows:

1. I am the General Manager for Saipan Stevedore Company, Inc. ("Saipan Stevedore").
2. Between March 27, 2020, and November 27, 2020, Saipan Stevedore received twenty-eight containers consigned to Debtor (collectively, "Debtor's Containers").
3. Since receiving Debtor's first container on March 27, 2020, to the Petition Date, without waiver of any of its claims and rights, Saipan Stevedore had been storing and securing Debtor's Containers for the benefit of the Debtor and without any payments from the Debtor.



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4. Since the Petition Date, without waiver of any of its claims and rights, Saipan Stevedore has continued to store and secure the Debtor's Containers for the benefit of the Debtor without any payments from the Debtor.
5. Saipan Stevedore's published storage fees are \$17.00 per day for 20-foot containers, and \$23.00 per day for 40-foot containers.¹
6. Saipan Stevedore filed its tariff rates and terminal services rates, including its storage fees, with the Federal Maritime Commission ("FMC").
7. The FMC's website lists Saipan Stevedore as a Terminal Marine Operator.²
8. Attached as Exhibit 1 to this Declaration is a true and correct copy of the said published storage fees.
9. For the period April 19, 2024, through the Sale Closure Date of August 20, 2025, Debtor has an outstanding balance of \$288,510.00 for storage fees of Debtor's Containers.
10. Attached as Exhibit 2 to this Declaration is a true and correct copy of the Pro-forma Invoice for post-petition storage fees incurred by Debtor up to the Sale Closure on August 20, 2025.

Dated this September 2, 2025.

Respectfully submitted,



Lee Cabrera,
General Manager
Saipan Stevedore

¹ See <https://saisteve.com/rates/current-rates-effective-september-01-2010/34-17-terminal-services/>.

² See <https://www2.fmc.gov/FMCIUsers/scripts/ExtReports.asp?tariffClass=mto.>



SAIPAN STEVEDORE COMPANY, INC.

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INC.

34.17 – TERMINAL SERVICES

RULE: 34.17 – TERMINAL SERVICES Eff: 01SEP2010

Effective 01SEP2010

Filing Codes A

Ad Valorem Cargo	2% over basic rate	
Asphalt (Drummed)	W/M	8.25
Bulk Cargo or Bleed Cargo	W/M	15.00
Bus (21 Pax or less)	UNIT	71.00
Bus (22 Pax or more)	UNIT	85.50
Cement (Bagged, Unpalletized)	W/M	12.00
Cement (Palletized)	W/M	10.00

A. Container Storage:

Container containing cargo 20' to 40' container will be assessed as follows:

20'	DAY	17.00
40'		23.00

Concrete Block

(Loose) PER BLOCK 1.05

Concrete Block

(Palletized) W/M 8.25

B. Container Containing Cargo:

1. Unstuffing container at

container freight station

CY/CY or CFS/CY will be

assessed for the

consignee's account W/M 6.50

2. From storage yard

to truck, trailer or

from truck, trailer

container yard. W/M 6.50

C. Container (Empty):

From storage yard to truck, trailer or from truck,
trailer to container yard.

20'	EACH MOVEMENT	35.00
40'		45.00
45'		50.00

D. Demurrage Rates:

Cargo stowed inside the transit-shed or outside if
special protection is required will be charged daily
at the rate of \$3.50 per revenue ton.

Cargo stowed in open areas, unprotected will be charged
daily at the rate of \$3.00 per revenue ton.

Empty container that has been in the yard beyond
thirty (30) days will be charged daily at the rate
of \$6.50 per container. To the account of carrier.

Drum 55-gal (Empty)	EACH	3.00
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General Cargo (Foodstuff Only)

excludes soft-drinks, alcoholic

and other beverages.	W/M	7.50
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General Cargo NOS	W/M	10.50
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Hazardous Cargo	W/M	14.25
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E. Heavy Lift Rates:

6,000 lbs. to 8,000 lbs.	4.00
8,001 lbs. to 10,000 lbs.	6.00
10,001 lbs. to 12,000 lbs.	8.00
12,001 lbs. to 14,000 lbs.	10.00
14,001 lbs. to 16,000 lbs.	12.00
16,001 lbs. to 18,000 lbs.	14.00
18,001 lbs. to 20,000 lbs.	16.00

For each additional 2,000 lbs. or fraction thereof in
excess of 2,000 lbs. will be assessed \$2.00.

Iron or Steel Products (Steel, Bars, Pipes, etc.)

W/M	8.75
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Livestock (Cows, Horses)	Per Head	22.00
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F. Long Length Rates:

40 feet and not over 50 feet	2.25
51 feet and not over 60 feet	3.00
61 feet and not over 70 feet	3.75
71 feet and not over 80 feet	4.50
81 feet and not over 90 feet	5.25
91 feet and not over 100 feet	6.00

For each additional ten (10) feet or fraction thereof in excess of one hundred (100) feet will be assessed \$1.25.

Lumber	MBM	8.75
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G. Miscellaneous:

All other services which do not fall in any of the above classifications, rate shall be by special arrangements between the terminal operator and the consignee or his representative or the carrier or his agent.

The minimum charge per line item of cargo in Bill of Lading is :1] \$12.50 on CFS or breakbulk cargos, or 2] \$65.00 on full containers carrying less than 20,000 lbs Redtu . or less than 400 cubic feet, (10 R/T).

Pigs	EACH	7.00
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Refrigerated Cargo (Foodstuffs Only)

W/M	8.50
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Refrigerated Cargo NOS	W/M	10.00
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Sand	W/M	10.50
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Scrap (Ferrous) Metal F.I.O.	Cost plus 25% for account of cargo
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Scrap (Non-Ferrous) Metal	W/M	9.00
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H. Special Services:

Garbage and Trash Removal	Per Call	40.00
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Drayage

Drayage charge shall apply when cargo is moved to any

point outside the terminal

operator's gate for the

convenience of the consignee. R/T 6.00

I. Transshipment Cargo:

Transshipment cargo at Saipan will be permitted free

storage for a minimum period of twenty (20) days.

Transshipment cargo remaining after the free time

including Saturdays, Sundays and Holidays, storage

charge at the rate of \$3.50 per weight ton 2,000 lbs. or

40 cubic feet or fraction thereof will be assessed

against the carrier.

J. Transshipment Handling Charges:

Special rates for transshipment handling

will be made by contract in the case when the cargo

requires special or unusual provision for transshipment

handling. Normal handling rate is \$9.50 per RT charge to

the account of the second carrier.

Trochus Shell (Bagged)	W/M	9.80
Truck/Van Truck	UNIT	75.00
Van Containing Cargo less		
than 20' container	W/M	6.65
Van Empty less than 20'		
container	W/M	5.10
Vehicles	UNIT	55.00

Exhibit 2



SAIPAN STEVEDORE COMPANY, INC.
P.O. BOX 500208
COMMERCIAL PORT
SAIPAN, MP 96950-0208

Telephone Numbers
Office (670) 322-9240
322-6469
Fax No. (670) 322-8568
Website: saisteve.com
Email: saisteve@pticom.com

PRO-FORMA - INVOICE

INVOICE NO. **SSC 000051**DATE 08.21.25CUSTOMER: Imperial Pacific InternationalCUST. NO. 4501

ADDRESS: PMB 918, P.O. Box 10000,
B.O.G Bldg. Garapan
Saipan MP 96950

To bill you for the services rendered on :

RE:

Storage Charges from April 19, 2024 to August 20, 2025

No.	BL#	Container No.	Cont. Size	No. of Days	Daily Rate	Amount
1	HUA20039810	CAIU 8659172	40'	489	\$ 23.00	\$ 11,247.00
2	SHA20028244	CAAU 5146466	40'	489	\$ 23.00	\$ 11,247.00
3	SHA20028244	CAIU 4378578	40'	489	\$ 23.00	\$ 11,247.00
4	SHA20028244	DRYU 9507051	40'	489	\$ 23.00	\$ 11,247.00
5	SHA20028244	FCIU 8725185	40'	489	\$ 23.00	\$ 11,247.00
6	SHA20028244	FDCU 0277720	40'	489	\$ 23.00	\$ 11,247.00
7	SHA20028244	PCIU 8948872	40'	489	\$ 23.00	\$ 11,247.00
8	SHA20028244	PCIU 8980766	40'	489	\$ 23.00	\$ 11,247.00
9	SHA20028244	PCIU 8984191	40'	489	\$ 23.00	\$ 11,247.00
10	SHA20028244	PCIU 9034017	40'	489	\$ 23.00	\$ 11,247.00
11	SHA20028244	PCIU 9080619	40'	489	\$ 23.00	\$ 11,247.00
12	SHA20028244	TCNU 4040711	40'	489	\$ 23.00	\$ 11,247.00
13	YTN20035793	PCIU 0104068	20'	489	\$ 17.00	\$ 8,313.00
14	YTN20035793	PCIU 8791696	40'	489	\$ 23.00	\$ 11,247.00
15	YTN20035793	PCIU 9281830	40'	489	\$ 23.00	\$ 11,247.00
16	HUA20039925	SEGU 4103536	40'	489	\$ 23.00	\$ 11,247.00
17	HUA20039925	CAIU 8559044	40'	489	\$ 23.00	\$ 11,247.00
18	SHA20028301	CRSU 1336716	20'	489	\$ 17.00	\$ 8,313.00
19	SHA20028301	DRYU 2591203	20'	489	\$ 17.00	\$ 8,313.00
20	SHA20028301	DRYU 2626932	20'	489	\$ 17.00	\$ 8,313.00
21	KEL20019719	PCIU 1114800	20'	489	\$ 17.00	\$ 8,313.00
22	KEL20019719	TRHU 1781632	20'	489	\$ 17.00	\$ 8,313.00
23	XGG20018675	BSIU 2647631	20'	489	\$ 17.00	\$ 8,313.00
24	USG0140135	TEXU 8954241	40FR	489	\$ 23.00	\$ 11,247.00
25	USG0140135	TEXU 8999375	40FR	489	\$ 23.00	\$ 11,247.00
26	USG0147674	TGHU 0030574	20	489	\$ 17.00	\$ 8,313.00
27	USG0147674	ECMU 2050800	20	489	\$ 17.00	\$ 8,313.00
28	USG0157234	CMAU 4266159	40	489	\$ 23.00	\$ 11,247.00
AMOUNT DUE						\$ 288,510.00

Thank you for doing business with us....

Signed by:

Lee Cabrera

RECEIVED BY: _____

DATE RECEIVED: _____