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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

**SECOND FEE APPLICATION  
CHAMBERS LAW LLC, LOCAL  
COUNSEL TO THE OFFICIAL  
COMMITTEE OF GENERAL  
UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM OCTOBER 1,  
2024 THROUGH SEPTEMBER 30, 2025;  
DECLARATION OF KEITH CHAMBERS  
II IN SUPPORT THEREOF**

Hearing Date, Time and Location (ChST):

Date: December 5, 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; AND ALL INTERESTED PARTIES:**

Chambers Law LLC (the “Firm”) hereby applies (the “Application”) to this Court for an order allowing, on an interim basis, \$4,327.80, as broken down below, for compensation for services rendered and expenses incurred as local counsel to 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 for the fee period from October 1, 2024 through and including September 30, 2025 (the “Fee Period”).

	<b>Fees</b>	<b>Expenses</b>	<b>Total</b>
<b>Total to be Allowed on an Interim Basis for Period 10/1/24 – 9/30/25</b>	\$4,290.00	\$37.80	\$4,327.80
<b>Total to be Paid on an Interim Basis</b>	\$4,290.00	\$37.80	\$4,327.80

The Firm filed one prior interim fee application on November 7, 2024 for the periods from May 24, 2024 through and including September 30, 2024, which requested the approval of interim compensation of fees in an amount of \$3,575.00 [ECF No. 302] (the “First Interim Application”). This First Interim Application was granted by a Court order entered on December 18, 2024, allowing \$3,575.00 in fees [ECF No. 332]. The Firm has been paid in an amount of \$3,575.00.

The Firm has not been promised compensation for the services it rendered or the expenses that it incurred during the Fee Period. Furthermore, the Firm does not have any agreement or understanding of any kind to divide, pay over, or share any portion of the fees to be awarded to AFS with any other attorney except as among members and associates at AFS. The Firm reserves its right to supplement this Application at any time before or at the hearing on this Application.

In support of this Application, the Firm concurrently submits the declaration of Keith Chambers II (the “Chambers Declaration”), and respectfully represents as follows:

**I. INTRODUCTION**

The Firm submits this Application pursuant to Section 330 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the United

1 States District Court for the Northern Mariana Islands, the Guidelines for Reviewing Applications  
2 for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, 20 C.F.R. Pt. 58,  
3 Appendix A (“ U.S. Trustee’s Guidelines”), and the Order Establishing Interim Fee Application  
4 and Expense Reimbursement Procedures on a Final Basis [ECF No. 149] (the “Compensation  
5 Procedure Order”).

6 Since its retention, the Firm as the local counsel to the Committee, rendered services to the  
7 Committee as requested and as appropriate in furtherance of the interests of unsecured creditors.  
8 The rate charged by the Firm is reasonable and comparable to those charged by other experienced  
9 and skilled professionals in similar situations. It is respectfully submitted that the services of the  
10 Firm were rendered in an expeditious and efficient manner and were beneficial to the Committee,  
11 the creditors, and the estate.

## 12 **II. BACKGROUND**

### 13 **A. General Background**

14 On April 19, 2024 (the “Petition Date”), Debtor commenced this bankruptcy case (the  
15 “Case”) by filing a voluntary petition under chapter 11 of title 11 of the U.S. Code (the “Bankruptcy  
16 Code”). Debtor is continuing to manage its property as a debtor-in-possession pursuant to  
17 Sections 1107(a) and 1108 of the Bankruptcy Code. Debtor is a limited liability company organized  
18 under the laws of the CNMI. Debtor obtained its exclusive casino license (the “Casino License”)  
19 for the island of Saipan and opened its operations in 2014. Debtor’s casino is primarily situated on  
20 property leased from the CNMI Department of Public Land (the “DPL”). The COVID-19  
21 Pandemic forced the closure of the Debtor’s operations in March 2020. In April 2021, Debtor’s  
22 Casino License was suspended by the Commonwealth Casino Commission (the “CCC”) for  
23 nonpayment of fees and other alleged monetary defaults.

24 Debtor’s primary real estate assets include (1) a hotel building currently under construction  
25 with a casino, (2) a leasehold interest in approximately 19,204 square meters of land leased from  
26 the DPL under Lease Agreement No. LA-15-002S (the “Leasehold Property”), and (3) Debtor’s  
27 ownership interest in Imperial Pacific Properties, LLC, which holds a leasehold interest in eight  
28 lots adjacent to the Leasehold Property.

1 **B. Employment of the Firm as Local Counsel for the Committee**

2 On May 14, 2024, the Office of the United States Trustee (“OUST”) appointed three (3)  
3 members to the Committee pursuant to Section 1102 of the Bankruptcy Code [ECF No. 54]. On  
4 June 21, 2024, the Committee filed its application to employ the Firm as local counsel for the  
5 Committee [ECF No. 133]. On July 8, 2024, the Court entered its order [ECF No. 163] granting  
6 the application and approving the Firm’s employment as local counsel to the Committee, effective  
7 as of May 24, 2024. Upon the Committee’s engagement of ArentFox Schiff LLP (“AFS”) as its  
8 general bankruptcy counsel and the Firm as its local counsel, AFS and the Firm have coordinated  
9 to avoid any duplication of services provided to the Committee.

10 **III. QUALIFICATIONS OF THE FIRM**

11 The Committee has selected the Firm as its local counsel to advise the Committee on matters  
12 of Commonwealth law. Keith Chambers II is the attorney responsible for providing services to the  
13 Committee. Mr. Chambers is admitted to practice before this Court. The rate charged by the Firm  
14 is comparable to those charged by other experienced and skillful professionals in similar situations.  
15 Here, the hourly rate for the Firm during the Fee Period was \$275.00. It is respectfully submitted  
16 that the services of the Firm were rendered in an expeditious and efficient manner and have been  
17 beneficial to this estate and creditors.

18 **IV. COMPENSATION REQUESTED**

19 **A. Compensation Requested for the Fee Period**

20 By way of this Application, the Firm requests the Court enter an order on an interim basis:  
21 (a) allowing compensation to the Firm of \$4,327.80, representing \$4,290.00 in services rendered  
22 and \$37.80 in actual and necessary expenses incurred during the Fee Period; and (b) authorizing  
23 payment of the unpaid balance of such amounts, \$4,327.80, pursuant to this Application. This is  
24 the Firm’s second fee application for allowance of compensation and reimbursement of expenses.  
25 The Court has entered one prior order allowing the Firm compensation and reimbursement of  
26 expense in this case, and the Firm received no retainer in connection with representing the  
27 Committee in this case. Except as set forth above, the Firm has received or been promised no  
28 compensation for the services that it rendered or the expenses that it incurred in this case.

1 Furthermore, neither the Firm nor any member of the Firm has any agreement or understanding of  
2 any kind to divide, pay over, or share any portion of the fees to be awarded to the Firm with any  
3 other person or attorney.

#### 4 **V. SUMMARY OF EXHIBITS**

5 In support of this Application, as required under the United States Trustee's guidelines, the  
6 Firm hereby submits Exhibits 1 through 3. Exhibit 1 is a summary, by activity category, of the  
7 services that the Firm rendered during the Fee Period. Exhibit 2 is a complete, chronological, line-  
8 item listing of the services and expenses that the Firm rendered during the Fee Period. Exhibit 2  
9 includes the name of the professional who rendered the services, the date the services were  
10 rendered, the hours spent rendering the service, the total billed for the service, and a detailed  
11 description of the services. Exhibit 3 is the professional biography of Mr. Chambers who worked  
12 on the case.

#### 13 **VI. SUMMARY OF SERVICES RENDERED**

14 During the Fee Period, the Firm provided services to the Committee on a regular basis with  
15 respect to its obligation as the designated local counsel and to protect the interests of the unsecured  
16 creditors and to preserve the estate's assets. As local counsel to the Committee, the Firm  
17 collaborated closely with AFS to ensure compliance with procedural requirements, including  
18 attendance at various hearings in person and monitoring the case docket to keep the Committee and  
19 AFS informed. It is for these efforts that the Firm seeks allowance of compensation. This section  
20 summarizes, by activity category, the primary services that the Firm provided to the Committee.  
21 Because the Firm categorizes its services in numbered categories that are similar to those  
22 recommended in the United States Trustee's Guidelines, the discussions in this Section are  
23 organized by category.

##### 24 **A. Case Management and Operating Reports – 00002**

25 The Firm recorded time to this category to handling case management issues and attendance  
26 at the hearings. The total fees incurred by the Firm in the Case Management and Operating Reports  
27 category during the Fee Period was \$522.50 representing 1.9 hours of service in this category.  
28

1 **B. Creditor Inquiries – 00007**

2 The Firm recorded time to this category to addressing inquiries from an unsecured creditor.  
3 Mr. Chambers consulted with a creditor regarding the receiving of a claim letter. The total fees  
4 incurred by the Firm in the Creditor Inquiries category during the Fee Period was \$110.00  
5 representing approximately 0.4 hours of service in this category.

6 **C. Sale and Disposition of Assets -- 00007**

7 The Firm recorded time to this category to attending the hearings and status conferences  
8 related to the sale of the Debtor's assets. The total fees incurred by the Firm in the Sale and  
9 Disposition of Assets category during the Fee Period was \$1,622.50 representing approximately  
10 5.9 hours of service in this category.

11 **D. Fee Applications – 00014**

12 The Firm recorded time to this category to preparing its fee applications. The total fees  
13 incurred by the Firm in the Fee Applications category during the Fee Period was \$1,320.00  
14 representing 5.1 hours of service in this category.

15 **E. Automatic Stay and Section 362 and 363 Matters – 00019**

16 The Firm recorded time to this category to attending the relief from stay hearing and status  
17 conference. The total fees incurred by the Firm in the Automatic Stay and Section 362 and 363  
18 Matters category during the Fee Period was \$137.50 representing 0.5 hours of service in this  
19 category.

20 **F. Travel -- 00029**

21 The Firm recorded time to this category related to traveling to and from the courthouse.  
22 Travel time was billed at 50% of the Mr. Chamber's hourly rate. The total fees incurred by the  
23 Firm in the Travel category during the Fee Period was \$495.00 representing 1.8 hours of service in  
24 this category.

25 **VII. SUMMOARY OF EXPENSES**

26 The Firm has incurred out-of-pocket disbursements during the Fee Period as itemized in  
27 Exhibit 2. Each charge incurred by the Firm was necessary and was incurred as a direct result of  
28 the Firm's representation of the Committee. The requested expenses incurred during the Fee Period

total \$37.80 and represent the actual and necessary costs and expenses incurred by the Firm in connection with its representation of the Committee.

### VIII. STATUTORY BASIS FOR COMPENSATION

The statutory predicates for the relief sought herein are 11 U.S.C. Sections 330 and 331, as supplemented by Federal Rule of Bankruptcy Procedure 2016. The Firm seeks compensation for actual, necessary professional services rendered and reimbursement of reasonable expenses incurred on behalf of the Committee during the Fee Period. Section 330(a)(1) of the Bankruptcy Code allows for the following: (A) reasonable compensation for actual, necessary services rendered by [an] attorney and by any paraprofessional person employed by such [attorney]; and (B) reimbursement for actual, necessary expenses.

Section 330(a)(3)(A) of the Bankruptcy Code provides that:

[i]n determining the amount of reasonable compensation to be awarded . . . the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including (A) the time spent on such services; (B) the rates charged for such services; (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under [Title 11]; (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title [11].<sup>1</sup>

Congress intended that bankruptcy attorneys be compensated at the market rate for comparable services in non-bankruptcy cases. See *In re Ames Dep't Stores, Inc.*, 76 F.3d 66, 71 (2d Cir. 1996) (citing *In re UNR Indus., Inc.*, 986 F.2d 207, 208–09 (7th Cir. 1993)). The policy of 11 U.S.C. Section 330 is to ensure that qualified attorneys will “not be deterred from taking bankruptcy cases due to a failure to pay adequate compensation.” *Id.* at 210. The Court’s examination of the reasonableness of services rendered must be conducted in an “objective manner, based upon what services a reasonable lawyer or legal firm would have performed . . . .” *Ames*

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<sup>1</sup> 11 U.S.C. § 330(a)(3).

Dep't Stores, 76 F.3d at 72 (citing In re Matter of Taxman Clothing Co., 49 F.3d 310, 315 (7th Cir. 1995). The Firm believes that its billing rates in this chapter 11 case, which reflect the Firm's customary billing rate, is "reasonable billing rate" for purposes of this Court's determination of the "reasonableness" of the fees for services rendered. The Firm's customary billing rate was disclosed in the retention papers and approved by this Court. The rate charged by the Firm is reasonable and are consistent with customary rates charged by similar law firms. Indeed, it is submitted that the rate charged is significantly less than many firms providing similar services. If the case was not a case under the Bankruptcy Code, the Firm would charge and expect to receive, on a current basis, an amount at least equal to the amounts requested herein for professional services.

### IX. CONCLUSION

In accordance with 11 U.S.C. Section 330, the Firm submits that the amounts requested herein are fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. The Firm further submits that pursuant to the criteria normally examined in bankruptcy cases, and based upon the factors considered in accordance with 11 U.S.C. Section 330 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the results achieved provide more than sufficient justification for approval of the compensation sought by the Firm.

**WHEREFORE**, the Firm respectfully requests that the Court enter an order on an interim basis: (a) allowing compensation to the Firm of \$4,290.00 in services rendered and \$37.80 in actual and necessary expenses incurred during the Fee Period; and (b) authorizing the Debtor to pay, at this time, \$4,327.80 to the Firm for services rendered to the Committee.

Dated: October 31, 2025

Respectfully submitted,

**CHAMBERS LAW LLC**

By: /s/ Keith Chambers II

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



**DECLARATION OF KEITH CHAMBERS II**

I, Keith Chambers II, declare that:

1. I am a sole practitioner and attorney licensed and admitted to practice before the United States District Court for the Northern Mariana Islands, Bankruptcy Division. I maintain an office for the practice of law at Chambers Law LLC (the “Firm”), Marianas Business Plaza, Suite 409, Saipan, MP 96950.

2. I am fully familiar with the facts hereinafter stated, and I am authorized to and hereby make this declaration (the “Declaration”) on behalf of the Firm. The information contained in this Declaration is of my own personal knowledge or my review of the files in this Case.

3. The Firm is the local counsel to the Committee. I submit this Declaration in support of the *Second Interim Fee Application of Chambers Law LLC, Local Counsel to the Official Committee of General Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2024 through September 30, 2025* (the “Fee Application”).

4. I have reviewed the Fee Application. The factual allegations in support of the Fee Application are set forth in Section VI of the Fee Application and are incorporated herein by this reference. These factual recitations are true and correct to the best of my knowledge, information and belief.

5. The amounts being requested are billed at rates no less favorable than those customarily employed by the Firm and generally accepted by the Firm’s non-bankruptcy clients.

6. I am familiar with the Guidelines of the Office of the United States Trustee. To my best knowledge, information, and belief, the Fee Application conforms to the U.S. Trustee’s Guidelines, the Local Bankruptcy Rule 2016-1, and any order of the Court, except as specifically noted herein.

7. As the billing attorney in this case, I carefully reviewed each monthly bill and carefully evaluated each and every billing entry.

8. Attached hereto as **Exhibit 1** is a summary, by activity category, of the services that the Firm rendered during the Fee Period.



**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2025, I caused the forgoing documents 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 pleadings and all attachments thereto have been served on all counsel of record via the Court's CM/ECF System.

Executed this 30th day of October 2025.

/s/ Aram Ordubegian

Aram Ordubegian

# EXHIBIT 1

<u>Codes</u>	<u>Hours</u>	<u>Fees</u>
0		37.80
2	1.9	522.50
7	0.4	110.00
8	5.9	1,622.50
14	5.1	1,402.50
19	0.5	137.50
29	1.8	495.00
<b>Total</b>	<b>15.6</b>	<b>4,327.80</b>

# EXHIBIT 2

10/30/2025

**Chambers Law, LLC**  
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 PMB 919 Box 10000  
 Saipan, MP 96950  
 Telephone: (670)234-9005  
 Email: keith.chambers@chamberslawenmi.com

Invoice # 0624-03  
 Case # 1:24-bk-00002  
 Client Official Committee of Unsecured Creditors of the Imperial Pacific  
 International (CNMI), LLC bankruptcy estate  
 Saipan, MP, CA

**Service Codes**

2 : Case Management	\$ 275.00
7 : Creditor Inquiries	\$ 275.00
8 : Sale of Assets	\$ 275.00
14 : In Court	\$ 275.00
19 : Automatic Stay	\$ 275.00
29 : Travel	\$ 275.00

\*\*Billing for Legal Services Rendered

Date	Attorneys Fees: August 2024 - February 2025	SC	Billable Time	Total	Atty
1-Oct-24	Attended Court Hearing	8	4	1,100.00	KC
1-Oct-24	Travel to 10/1 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
16-Oct-24	Emailed S. Wang Re first interim fee application	14	0.1	27.50	KC
17-Oct-24	Reviewed Response from S. Wang re fee application	14	0.1	27.50	KC
19-Oct-24	Reviewed Email from Y. Li re Fee Statement	14	0.1	27.50	KC
19-Oct-24	Responded to Y. Li email re May-June Fee Statement	14	0.1	27.50	KC
24-Oct-24	Reviewed email from S. Wang re the First Fee Interim application	14	0.1	27.50	KC
24-Oct-24	Responded to S. Wang's email re the First Fee Interim application	14	0.1	27.50	KC
25-Oct-24	Reviewed reply from S. Wang re my response email cocerning the First Interim Fee application	14	0.1	27.50	KC
25-Oct-24	Sent Response to Reply from S. Wang re my response email cocerning the First Interim Fee application	14	0.1	27.50	KC
26-Oct-24	Reviewed First Interim Fee Application for Period of April 19, 2024 to September 30, 2024 canceled meeting announcement	14	0.1	27.50	KC
26-Oct-24	Responded to First Interim Fee Application for Period of April 19, 2024 to September 30, 2024 canceled meeting announcement	14	0.1	27.50	KC
26-Oct-24	Meeting with S. Wang about fee statement report	14	0.3	82.50	KC
31-Oct-24	Reviewed email from S. Wang re first interim fee application	14	0.1	27.50	KC
1-Nov-24	Phone call with H. Bersabal; Asking for claim letter. Has not received	7	0.1	27.50	KC
1-Nov-24	Emailed S. Wang re phone call with H. Bersabal; Asking for claim letter. Has not received	7	0.1	27.50	KC
4-Nov-24	Review S. Wang's response re my email re phone call with Hazel Bersabel	7	0.1	27.50	KC
4-Nov-24	Reviewed S. Wang's email re interim fee application	14	0.1	27.50	KC
4-Nov-24	Responded to S. Wang's email re interim fee application	14	0.1	27.50	KC
4-Nov-24	Reviewed Sophia's reply to my reponse email re Sophia's email re interim fee application	14	0.1	27.50	KC

10/30/2025

**Chambers Law, LLC**  
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 Saipan, MP 96950  
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 Email: keith.chambers@chamberslawenmi.com

Invoice # 0624-03

Case # 1:24-bk-00002

Client Official Committee of Unsecured Creditors of the Imperial Pacific  
 International (CNMI), LLC bankruptcy estate  
 Saipan, MP, CA

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 7 : Creditor Inquiries \$ 275.00  
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 29 : Travel \$ 275.00

**\*\*Billing for Legal Services Rendered**

Date	Attorneys Fees: August 2024 - February 2025	SC	Billable Time	Total	Atty
4-Nov-24	Responded to Sophia's reply to my reponse email re Sophia's email re interim fee application	14	0.1	27.50	KC
4-Nov-24	Emailed S. Wang requesteing to be excused from November 7, 2025 Status Conference	2	0.1	27.50	KC
4-Nov-24	Reviewed S. Wang's response to my email requesting to be excused from November 2025 Status Conference	2	0.1	27.50	KC
4-Nov-24	Responded to S. Wang response to my email requesting to be excused from November 2025 Status Conference	2	0.1	27.50	KC
4-Nov-24	Reviewed Draft Motion For An Order To (1) Excuse Chambers Law Llc From Appearing At Status Conference Scheduled For November 6, 2024, Or (2) Alternatively, To Appear Via Video Conference	2	0.1	27.50	KC
4-Nov-24	Reviewed Proposed Order Granting Motion For An Order To (1) Excuse Chambers Law Llc From Appearing At Status Conference Scheduled For November 6, 2024, Or (2) Alternatively, To Appear Via Video Conference	2	0.1	27.50	KC
4-Nov-24	Reviewed S. Wang's email from the court granting the proposed oder	2	0.1	27.50	KC
4-Nov-24	Responded to S. Wang's email from the court granting the proposed order	2	0.1	27.50	KC
5-Nov-24	Reviewed A. Nguyen's response to S. Wang's email re Hazel Bersabal	7	0.1	27.50	KC
6-Nov-24	Reviewed S. Wang's email re interim fee application	14	0.1	27.50	KC
7-Nov-24	Drafted August/September Fees with summaries	14	0.3	82.50	KC
7-Nov-24	Emailed S. Wang August/September Fees with summaries	14	0.1	27.50	KC
7-Nov-24	Reviewed S. Wang's response to my August/September fees with summaries	14	0.1	27.50	KC
7-Nov-24	Responded to S. Wang's October 31, 2024 email re first interim fee application	14	0.1	27.50	KC
7-Nov-24	Reviewed S. Wang's reply to my response to her October 31, 2024 email	14	0.1	27.50	KC



10/30/2025

**Chambers Law, LLC**  
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Email: keith.chambers@chamberslawenmi.com

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**\*\*Billing for Legal Services Rendered**

Date	Attorneys Fees: August 2024 - February 2025	SC	Billable Time	Total	Atty
7-Nov-24	Provided edits to the First Interim Fee Application Draft provided by S. Wang	14	1	275.00	KC
7-Nov-24	Reviewed edits to the First Interim Fee Application made by S. Wang	14	0.1	27.50	KC
8-Nov-24	Reviewed additional edits to my First Interim Fee Application made by the Committee	14	0.2	55.00	KC
8-Nov-24	Phone call with S. Wang	14	0.1	27.50	KC
8-Nov-24	Reviewed and gave approval for final draft of first interim fee application	14	0.2	55.00	KC
17-Dec-24	Reviewed Draft Order Approving First Interim Fee Application Of Chambers Law LLC, Local Counsel To The Official Committee Of General Unsecured Creditors, For Allowance Of Compensation And Reimbursement Of Expenses For The Period From May 24, 2024 Through September 30, 2024	14	0.1	27.50	KC
17-Dec-24	Gave approval for Draft Order Approving First Interim Fee Application Of Chambers Law LLC, Local Counsel To The Official Committee Of General Unsecured Creditors, For Allowance Of Compensation And Reimbursement Of Expenses For The Period From May 24, 2024 Through September 30, 2024	14	0.1	27.50	KC
31-Jan-25	Attended Court Hearing and Status Conference	8	0.5	137.50	KC
31-Jan-25	Travel to 1/31 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
18-Mar-25	Reviewed an email from K. Freeman concernign the second interim fee application	14	0.1	27.50	KC
20-Mar-25	Phone call with District Court clerk of court re IPI hearing date	2	0.1	27.50	KC
16-Apr-25	Email S. Wang re Verita Global email.	2	0.1	27.50	KC
29-Apr-25	Attended IPI Hearing	8	0.5	137.50	KC
29-Apr-25	Travel to 4/29/25 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
17-May-25	Email S. Wang re Verita Global email.	2	0.1	27.50	KC

10/30/2025

**Chambers Law, LLC**  
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Email: keith.chambers@chamberslawenmi.com

Invoice # 0624-03  
Case # 1:24-bk-00002  
Client Official Committee of Unsecured Creditors of the Imperial Pacific  
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29 : Travel	\$ 275.00

\*\*Billing for Legal Services Rendered

Date	Attorneys Fees: August 2024 - February 2025	SC	Billable Time	Total	Atty
4-Jun-25	Email S. Wang re the Casino Commission	2	0.1	27.50	KC
13-Jun-25	Appeared at Motion for Relief from Stay and Status Conference	19	0.5	137.50	KC
13-Jun-25	Travel to 6/13/25 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
15-Jun-25	Email S. Wang re Verita Global email.	2	0.1	27.50	KC
27-Jun-25	Attended Hearing	8	0.2	55.00	KC
27-Jun-25	Travel to 6/27/25 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
24-Jul-25	Attended Status Conference and OSC Hearing	8	0.7	192.50	KC
24-Jul-25	Travel to 7/24/25 hearing (full roundtrip 0.6)	29	0.3	82.50	KC
16-Jul-25	Emailed S. Wang to follow up re next biling cycle	14	0.1	27.50	KC
11-Aug-25	Requested permission to file motion to be excused from the upcoming hearing	2	0.1	27.50	KC
12-Aug-25	Reviewed S. Wang's response to my request to be excused from the upcoming hearing	2	0.1	27.50	KC
12-Aug-25	Drafted Proposed Order Granting 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	2	0.2	55.00	KC
12-Aug-25	Drafted 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	2	0.2	55.00	KC
13-Aug-25	Reviewed updated proposed Order Granting 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	2	0.1	27.50	KC
13-Aug-25	Followed up on S. Wang re second interim fee application	14	0.1	27.50	KC
18-Sep-25	Respond to S. Wang re second interim fee application	14	0.1	27.50	KC

10/30/2025

**Chambers Law, LLC**  
 Suite 409 Nauru Building, Susupe  
 PMB 919 Box 10000  
 Saipan, MP 96950  
 Telephone: (670)234-9005  
 Email: keith.chambers@chamberslawenmi.com

Invoice # 0624-03

Case # 1:24-bk-00002

Client Official Committee of Unsecured Creditors of the Imperial Pacific  
 International (CNMI), LLC bankruptcy estate  
 Saipan, MP, CA

**Service Codes**

2 : Case Management \$ 275.00  
 7 : Creditor Inquiries \$ 275.00  
 8 : Sale of Assets \$ 275.00  
 14 : In Court \$ 275.00  
 19 : Automatic Stay \$ 275.00  
 29 : Travel \$ 275.00

**\*\*Billing for Legal Services Rendered**

Date	Attorneys Fees: August 2024 - February 2025	SC	Billable Time	Total	Atty
23-Sep-25	Respond to S. Wang re second interim fee application	14	0.1	27.50	KC
27-Sep-25	Meeting with S. Wang re second interim fee application	14	0.2	55.00	KC
	<i>Total this page</i>			<b>4,290.00</b>	
	<b>Total Hours</b>		15.6		
	<b>Total Amount Due For Legal Services Rendered</b>			<b>4,290.00</b>	

**For Disbursements:**

1-Oct-24	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30
31-Jan-25	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30
29-Apr-25	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30
13-Jun-25	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30
27-Jun-25	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30
24-Jul-25	K. Chambers - Mileage, Attendance at hearing/status conference at NMI courthouse in Saipan, MP	6.30

**Total Amount Due For Disbursements****37.80*****Total Billing Due*****4,327.80**

Keith Chambers

Attorney-at-Law

Please make checks payable to: Chambers Law, LLC***Thank You!***

# EXHIBIT 3

## KEITH CHAMBERS II

(670) 588-7384 · kdchambersii@gmail.com · PMB 919 Box 10000, Saipan, MP 96950

### Education

**THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL**, Washington, DC  
J.D., with High Honors, May 2016

- GPA: 3.755, Order of the Coif

**THE FLORIDA STATE UNIVERSITY**, Tallahassee, FL  
B.A., *summa cum laude*, in History, International Affairs, and Social Sciences, May 2013

- GPA: 3.992

### Professional Experience

#### **Chambers Law LLC, Saipan, MP**

*Attorney*

February 2023 – Present

#### **Commonwealth Superior Court, Saipan, MP**

*Law Clerk for the Honorable Joseph N. Camacho*

February 2022 – January 2023

- Drafted published orders in response to motions submitted to the Court

#### **Office of the Attorney General, Saipan, MP**

*Assistant Attorney General*

January 2021 – January 2022

- Researched and analyzed Commonwealth regulations to respond to legal services requests

#### **Commonwealth Superior Court, Saipan, MP**

*Law Clerk for the Honorable Joseph N. Camacho*

January 2019 – January 2021

- Drafted over thirty (30) published orders in response to motions submitted to the Court
- Created a search and seizure PowerPoint presentation used for law enforcement training

#### **Law Counsel, Washington, DC**

*Document Review Attorney*

September 2018 – December 2018

#### **D.C. Department of Consumer and Regulatory Affairs, Washington, DC**

*Pro Bono Attorney Advisor*

April 2018 – July 2018

*Attorney Advisor Fellow*

March 2017 – March 2018

- Unilaterally argued cases before administrative law judges on behalf of the agency
- Negotiated settlement agreements to obtain a favorable outcome for the agency

#### **The George Washington University Law School**

**Health Rights Law Clinic**, Washington, DC

*Student Attorney*

Fall 2015

- Advised clients about their Medicare and Medicaid rights and choosing healthcare plans

#### **Milken Institute School of Public Health, Washington, DC**

*Legal Research Assistant*

Summer 2015

- Analyzed proposed benchmark plans to verify Affordable Care Act compliance

#### **U.S. Securities and Exchange Commission, Washington, DC**

*Intern, Division of Corporation Finance*

Spring 2015

- Researched the impact of energy regulations on the SEC's reporting requirements

#### **NuMedCare, LLC, Boca Raton, FL**

*Compliance Officer*

Summer 2014

- Researched Food, Drug, and Cosmetic Act and HIPAA compliance requirements

hib\_2016-1a (12/09)

Print name if original signature