

OFFICE OF THE UNITED STATES TRUSTEE

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**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. 24-00002
(Chapter 11)

Judge: Hon. ROBERT J. FARIS

**UNITED STATES TRUSTEE'S MOTION FOR A STAY OF FEE HEARINGS
IN LIGHT OF LAPSE OF APPROPRIATIONS; PROPOSED ORDER**

The Acting United States Trustee, by and through counsel, moves under Federal Rules of Bankruptcy Procedure 9013 and under all other applicable statutes and rules, for a stay of the interim or final fee applications filed by Intrepid Investment Bankers LLC (final) (ECF 483); ArentFox Schiff LLP (interim) (ECF 485); Choi & Ito (interim) (EDF 486); McDonald Law Office (interim) (ECF 487); and Chambers Law LLC (interim) (ECF 484) (collectively "the Fee Applications").



1 1. At the end of the day on September 30, 2025, the appropriations act that had been
2 funding the Department of Justice expired and appropriations to the Department lapsed. The
3 Department does not know when funding will be restored by Congress.

4 2. Absent an appropriation or continuing resolution, Department of Justice attorneys
5 and employees, including the United States Trustee and her staff, are prohibited from working,
6 even on a voluntary basis, except in very limited circumstances, including “emergencies
7 involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

8 3. Undersigned counsel for the Department of Justice, through the United States
9 Trustee, therefore requests a stay of the Fee Applications until Congress has restored
10 appropriations to the Department.

11 4. If this motion for a stay is granted, undersigned counsel will notify the Court as
12 soon as Congress has appropriated funds for the Department, including the United States Trustee
13 Program. The United States Trustee requests that, at that point, all current deadlines for the
14 parties be extended commensurate with the duration of the lapse in appropriations – i.e., each
15 deadline would be extended by the total number of days of the lapse in appropriations.

16 5. The United States Trustee has requested that the fee applicants consent to the
17 temporary stay but has not heard back formally from them.

18 Therefore, although the United States Trustee greatly regrets any disruption caused to the
19 Court and the other litigants, the United States Trustee hereby moves for a stay of the Fee
20 Applications, including filing comments and objections, holding hearings, and entering orders
21 granting or denying such Fee Applications until Department of Justice attorneys are permitted to
22 resume their usual civil litigation functions.

DATE: Honolulu, Hawaii, November 4, 2025.

Tiffany L. Carroll
Acting United States Trustee

By /s/ CURTIS CHING
Assistant U.S. Trustee

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**ORDER ON THE MOTION OF THE UNITED STATES TRUSTEE FOR A
STAY OF FEE HEARINGS IN LIGHT OF LAPSE OF APPROPRIATIONS**

The Acting United States Trustee (the “United States Trustee”) filed her Motion of the United States Trustee for a Stay of the hearing set for December 5, 2025 and associated brief schedules on fee applications for compensation in light of the lapse of appropriations (“Motion”).

Based on the Motion and for good cause,

IT IS HEREBY ORDERED THAT:

1. The Motion is Granted.

- 1 2. The hearing set for December 5, 2025 on fee applications for compensation is off
2 calendar. Once the lapse in appropriations is resolved, the Court will reschedule the
3 hearing.
- 4 3. Within two (2) business days after the lapse in appropriations is resolved, the United
5 States Trustee shall file a notice on the docket so stating. Within seven (7) business
6 days after the lapse in appropriations is resolved, the United States Trustee must
7 either 1) file a stipulation that sets a new briefing schedule for the fee applications
8 and proposes a new hearing date or, if an agreement is not reached 2) file a request
9 that the Court set a sets a new briefing schedule and hearing date.
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