

1 Aram Ordubegian (admitted *pro hac vice*)
Christopher K.S. Wong (admitted *pro hac vice*)

2 **ARENTFOX SCHIFF LLP**
3 555 South Flower Street, 43rd Floor
Los Angeles, CA 90071
4 Telephone: 213.629.7400
Facsimile: 213.629.7401
5 aram.ordubegian@afslaw.com
christopher.wong@afslaw.com

6 Keith Chambers II (F0528)
7 **CHAMBERS LAW LLC**
Marianas Business Plaza, Suite 409
PMB 919 Box 10000
8 Saipan, MP 96950
Telephone: 670.234.9005/06
9 Facsimile: 670.235.9007
keith.chambers@chamberslawcnmi.com

10 Attorneys for the Official Committee
11 of General Unsecured Creditors

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

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ARENTFOX SCHIFF LLP



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In re:

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

Debtor and Debtor in Possession.

Case No. 1:24-bk-00002

Chapter 11

**DECLARATION OF MICHAEL E.
SALZMAN IN SUPPORT OF:**

**SECOND INTERIM FEE APPLICATION
OF ARENTFOX SCHIFF LLP, GENERAL
BANKRUPTCY 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**

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

DECLARATION OF MICHAEL E. SALZMAN

I, Michael E. Salzman, under penalty of perjury, declare as follows:

1. I am an individual over the age of twenty-one (21), an attorney admitted to practice in New York, and the general counsel of Hughes Hubbard & Reed LLP (“Hughes Hubbard”), which is a duly appointed member and Chair of the Official Committee of Unsecured Creditors in the Imperial Pacific International (CNMI), LLC bankruptcy case (the “Committee”). I submit this declaration (the “Declaration”) in support of the *Second Interim Fee Application of ArentFox Schiff LLP, General Bankruptcy 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 “Application”). All capitalized terms used herein shall have the meanings ascribed to them in the Application, unless otherwise defined.

2. The facts set forth in this Declaration are based upon Hughes Hubbard’s extensive knowledge of bankruptcy proceedings, my and other attorneys at Hughes Hubbard’s review of the relevant documents, information provided to me or verified by the AFS, and the personal opinions

1 of me and other attorneys at Hughes Hubbard based upon our experience, knowledge, and
2 information provided to us. I am authorized to submit this Declaration on behalf of Hughes Hubbard
3 as Chair of the Committee, and, if called upon to testify, I would testify competently to the facts
4 set forth herein.

5 3. On or about May 14, 2024, the Office of the United States Trustee formed the
6 Committee. On or about May 16, 2024, the Committee retained ArentFox Schiff LLP (“AFS”) to
7 represent the Committee as general bankruptcy counsel.

8 4. During the Fee Period, I and other attorneys at Hughes Hubbard worked with AFS.
9 As Committee Chair, Hughes Hubbard is satisfied with the services that AFS has provided to the
10 Committee during the Fee Period, and believes that AFS has significantly aided the Committee and
11 the estate with respect to this case.

12 5. In its capacity as Chair of the Committee, Hughes Hubbard reviewed the
13 Application and the related billing statements for payment of fees and reimbursement of expenses
14 for AFS, and has no objection to the fees and expenses requested in the Application. I understand
15 that the Office of the United States Trustee (the “US Trustee”) has requested and ASF has agreed
16 to the reduction of certain fees requested in the Application. Therefore, Hughes Hubbard, in its
17 capacity as Chair of the Committee, supports interim allowance and payment of the amounts set
18 forth in the Application, as modified by the fee reduction agreement between the US Trustee and
19 ASF.

20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
21 and correct.

22 Executed this 21st day of November 2025, at New York, New York.

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25 
26 MICHAEL E. SALZMAN
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CERTIFICATE OF SERVICE

I hereby certify that on November 21, 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 21th day of November, 2025.

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