

FILED  
Clerk  
District Court

NOV 25 2025

for the Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Jeffrey N. Pomerantz (*Pro hac vice* forthcoming)  
Jeffrey W. Dulberg (*Pro hac vice* forthcoming)  
PACHULSKI STANG ZIEHL & JONES LLP  
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Attorneys for Intrepid Investment Bankers, LLC

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

**MOTION FOR LIMITED WAIVER OF  
LOCAL COUNSEL REQUIREMENT**

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

Pachulski Stang Ziehl & Jones LLP ("PSZJ"), counsel to Intrepid Investment Bankers, LLC ("Intrepid"), investment banker to the Official Committee of Unsecured Creditors in the above-captioned case, respectfully moves the Court to issue an order, for good cause, permitting the undersigned attorneys to appear without local counsel for the limited purpose of (i) filing the attached Reply To United States Trustee's Objection to First and Final Fee Application (the "Fee Application") of Intrepid Investment Bankers LLC, Investment Banker to the Official Committee Of General Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses (the "Reply") and appearing at any hearing scheduled in connection therewith.

PACHULSKI STANG ZIEHL & JONES LLP  
ATTORNEYS AT LAW  
LOS ANGELES, CALIFORNIA



1 The local counsel requirement for non-resident and pro hac vice applicants “may be  
2 waived for good cause, at the Court’s discretion, upon a showing that the attorney has made  
3 diligent efforts to associate with local counsel and has been unable to do so.” LR 83.5(f) (made  
4 applicable by LBR 2090-1).

5 As shown by the attached Declaration of Jeffrey W. Dulberg, PSZJ was only recently  
6 retained and its representation of Intrepid will be limited to filing the Reply and assisting Intrepid  
7 with prosecution of the Fee Application including appearing at the scheduled hearing. The firm  
8 has made initial attempts to identify local counsel since its retention but is required to file the  
9 Reply by close of business on November 26, 2025 (ChST). Given the very limited scope of  
10 representation, PSZJ and Intrepid request that the Court waive the local counsel requirement in  
11 accordance with the foregoing Local Rule at least until the outcome of the hearing to consider the  
12 Fee Application.

13 Dated: November 24, 2025

PACHULSKI STANG ZIEHL & JONES LLP

14  
15 By: /s/ Jeffrey W. Dulberg

16 Jeffrey N. Pomerantz

17 Jeffrey W. Dulberg

18 Attorneys for Intrepid Investment Bankers, LLC  
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**DECLARATION OF JEFFREY W. DULBERG**

I, Jeffrey W. Dulberg, declare that:

1. I am a partner at Pachulski Stang Ziehl & Jones LLP ("**PSZJ**"), a law firm that employs over seventy-five (75) attorneys and maintains an office for the practice of law at 10100 Santa Monica Blvd., 13<sup>th</sup> Floor, Los Angeles, CA 90067, as well as offices in San Francisco, California, New York, New York, Wilmington, Delaware, and Houston, Texas. I have personal knowledge of the facts stated in this Declaration.

2. In accordance with Local Rule 83.5(f), I hereby submit this Declaration in support of the Motion for Limited Waiver of Local Counsel Requirement (the "**Motion**").

3. On or about November 20, 2025, PSZJ was retained as counsel to Intrepid, investment banker to the Official Committee of Unsecured Creditors of Imperial Pacific International LLC.

4. PSZJ was only recently retained and its representation of Intrepid will be limited to filing the Reply<sup>1</sup> and assisting Intrepid with prosecution of the Fee Application including appearing at the scheduled hearing. The firm has made initial attempts to identify local counsel since its retention but is required to file the Reply by close of business on November 26, 2025 (ChST). Given the very limited scope of representation, I respectfully request that the Court waive the local counsel requirement in accordance with the foregoing Local Rule at least until the outcome of the hearing to consider the Fee Application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24<sup>th</sup> day of November, 2025 at Los Angeles, California.

  
Jeffrey W. Dulberg

<sup>1</sup> Capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 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 25<sup>th</sup> day of November, 2025.

/s/   
Keith Chambers