

Edward Manibusan (F0131)  
Attorney General  
J. Robert Glass, Jr. (F0523)  
Chief Solicitor  
Office of the Attorney General  
Hon. Juan A. Sablan Mem. Bldg., 2nd Floor  
Saipan, MP 96950-8907  
Tel: (670) 237-7500  
Fax: (670) 664-2349  
Email: robby\_glass@cnmioag.org

*Attorney for Creditor, The Commonwealth of the  
Northern Mariana Islands*

**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)**

**JOINDER IN LIMITED OPPOSITION BY  
JUDGMENT CREDITOR JOSHUA  
GREY AND BY UNITED STATES  
TRUSTEE'S STATEMENT TO JOINT  
MOTION FOR ORDER APPROVING  
DISCLOSURE STATEMENT FOR  
JOINT CHAPTER 11 PLAN OF  
LIQUIDATION DATED OCTOBER 31,  
2025 BY DEBTOR AND OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS AND BALLOTING  
PROCEDURES AND SCHEDULING  
DEADLINES**

Creditor, the Commonwealth of the Northern Mariana Islands and its agencies (the "Commonwealth"), by and through its undersigned counsel, Chief Solicitor J. Robert Glass, Jr., joins the Oppositions by Judgement Creditor Joshua Gray (ECF 522) and the United States Trustee (ECF 523). The Commonwealth joins the entirety of both Oppositions including the arguments and relief sought.



Respectfully submitted: December 11, 2025

OFFICE OF THE ATTORNEY GENERAL  
EDWARD MANIBUSAN  
ATTORNEY GENERAL

/s/ J. Robert Glass, Jr.  
J. ROBERT GLASS, JR. (F0523)  
Chief Solicitor

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing was electronically filed on December 11, 2025 with service requested to all parties of record through the ECF system.

/s/ J. Robert Glass, Jr.  
J. ROBERT GLASS, JR. (F0523)  
Chief Solicitor