

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

COMPLEX BUSINESS LITIGATION
DIVISION

In re:

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

**AMENDED MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY
NARDELLA & NARDELLA, PLLC, AS COUNSEL TO THE ASSIGNEE
FOR THE PERIOD OF FEBRUARY 11, 2022 THROUGH JULY 31, 2022**

**NOTICE OF OPPORTUNITY TO OBJECT
TO CREDITORS AND OTHER INTERESTED PARTIES:**

PLEASE TAKE NOTICE that, pursuant to Fla Stat. § 727.111(4), the Assignee may pay the fees and expenses of professional persons employed by the Assignee as set forth herein, and the Court may consider these actions without further notice unless a party in interest files an objection before the hearing set to consider this motion. If you object to the relief requested in this paper, you must file your objection with the Miami-Dade County Clerk of the Court at 73 W. Flagler Street, Room 133, Miami, FL 33130, and serve a copy on the Assignee's counsel, Michael A. Nardella, Esq. and Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Blvd., Ste. 300, Orlando, FL 32801, and any other appropriate person. If you do not file an objection within the time permitted, the Assignee and the Court will presume that you do not oppose the granting of the relief requested in the paper.

NARDELLA & NARDELLA, PLLC (“Applicant”), pursuant to Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), files this motion (the “Motion”) for approval and payment of interim fees in the amount of \$92,067.50 and reimbursement of expenses in the amount of \$4,324.99 for a total award of \$96,392.49 incurred in connection with its representation of Mark C. Healy (“Assignee”), in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC (“Crystal Cruises” or the “Assignor” and referred to together with Crystal Holdings U.S. LLC (“Crystal Holdings”), and Crystal Aircruises LLC (“Crystal Aircruises”), collectively as the “Assignors”) during the period of February 11, 2022 through July 31, 2022 (the “Application Period”). In support of the Motion, the Applicant states:

1. On February 10, 2022, the Assignors executed and delivered, and the Assignee accepted, irrevocable assignments for the benefit of creditors to the Assignee (collectively, the “Assignments”). On February 11, 2022 (the “Petition Date”), a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for each of the Assignors, thereby commencing the following assignment for the benefit of creditors cases pursuant to Section 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01, *In re Crystal Holdings U.S. LLC*, Case No. 2022-002757-CA-01, and *In re Crystal Aircruises LLC*, Case No. 2022-002758-CA-01 (individually referred to as an “Assignment Case” and collectively, as the “Assignment Cases”).

2. Pursuant to Florida Statute § 727.108(7), the Applicant was retained as co-counsel, along with Berger Singerman LLP, by the Assignee to perform all legal activities required for the benefit of the estates. On March 3, 2022, the Court entered an order approving the employment of Applicant as counsel to the Assignee *nunc pro tunc* to February 11, 2022.

3. Prior to the Petition Date, the Assignors were engaged in the travel and entertainment business, including operating ocean, river, and expedition cruises and conducting related activities around the world.

4. As a result of the efforts by the Assignee and the Applicant, the Assignee negotiated agreements relating to the rejection of certain leases for office space in Florida and California where the Assignors and later the Assignee conducted business. These negotiations resulted in the preparation and filing of the following rejection motions: (1) *Motion by Assignee for Order Authorizing Rejection of an Unexpired Lease* filed on May 26, 2022 (the “CA Lease Rejection Motion”); and (2) *Motion by Assignee for Order Authorizing Rejection of an Unexpired Lease* filed on August 4, 2022, as amended on August 17, 2022 (collectively, the “FL Lease Rejection Motion”). After a hearing on June 15, 2022, the Court granted the CA Lease Rejection Motion. The FL Lease Rejection Motion is currently scheduled for hearing on September 7, 2022. The Applicant continues to lead discussions with former landlords regarding estate claims and lease rejection issues.

5. The Applicant also expended a significant amount of time during the Application Period analyzing and conducting research regarding the claims made by the Independent Order of Foresters (“Foresters”) to assets of the Assignment Estates. Applicant worked with co-counsel to prepare for and respond to the *Emergency Motion for Temporary Injunction* (“Injunction Motion”) relating to deposits made by Foresters in connection with its reservation of staterooms in connection with a future cruise (the “Deposits”).

6. As of August 2, 2022, the current cash balance in the estates is \$15,283,569.94 (the “Estate Funds”).

7. During the Application Period, Applicant also provided additional reasonable and necessary services to the Assignment estates including, without limitation, the following:

(a) worked on first day pleadings and prepared for and attended first day hearings and other hearings held during the Application Period;

(b) prepared for and conducted the examination of the Assignors' representative on March 28, 2022;

(c) assisted with evaluating the assets of the estates and potential claims available to the Assignment Estate, including without limitation, a claim for payment under an agreement with an affiliate of the Assignor's Florida landlord entered into prior to the Assignment Date;

(d) prepared for and attended status calls with the Assignee on a weekly basis to discuss the Assignee's efforts to market and sell the assets of Assignors and all other matters affecting the administration of the Assignment Estates;

(e) review various claims filed against the Assignment Estates by consumer creditors and communicate with creditors;

(f) communicated with creditors and the Assignee's team to discuss the status of these Assignment Cases;

(g) reviewed and analyzed available assets for collection upon successful prosecution of the Assignment Estates' claims;

(h) coordinated the engagement of several special counsel, prepared related motions to employ special counsel and interacted with special counsel to facilitate progress on related matters on behalf of Assignee;

(i) evaluated the Assignee’s interest in an action brought by the Assignor in the Belgium Maritime Court prior to the Assignment Date.

(j) worked on various garnishment actions pending before the filing of the Assignment Cases, including the garnishment cases of Peninsula Petroleum and Freedom Fresh;

(k) addressed issues relating to pending employment litigation; and

(l) assisted co-counsel with the sale of the assets of the Assignment Estate.

8. The Applicant, as counsel to the Assignee, has incurred fees in the amount of \$92,067.50 for legal services provided to the Assignee during the Application Period as identified in the chart below and expenses in the amount of \$4,324.99 (for a total of \$96,392.49) in the nature of filing fees, court reporter fees, and photocopy charges. Applicant’s invoice is attached hereto as **Exhibit “A”**. The summary of the fees and expenses incurred are as follows:

SUMMARY OF FEES OF PROFESSIONALS

Partners/Associates & Paraprofessionals	Hours	Rate	Total
Paul Mascia	120.70	\$425.00	\$51,297.50
Michael A. Nardella	59.50	\$450.00	\$26,775.00
Matthew Silbemagel	37.50	\$250.00	\$9,375.00
Jonathan Sykes	2.50	\$450.00	\$1,125.00
Karen Cooper	15.40	\$225.00	\$3,465.00
Stephen Nardella	.30	\$100.00	\$30.00
TOTALS	235.90		\$92,067.50

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Filing Fee	\$406.00
Recording Fees	\$74.25
Travel	\$1,989.93
Postage	\$.53
Ownership and Encumbrance Reports	\$1,800.00
Working Meals	\$54.28
Total Expenses	\$4,324.99

9. Given the nature of these proceedings, and the amount of work that went into representing the Assignee during the Application Period, the Applicant respectfully requests that the Court approve this Application and allow the Applicant an interim award of fees in the amount of \$93,067.50 and reimbursement of expenses in the amount of \$4,324.99, for a total of \$96,392.49 for the period of February 11, 2022 through July 31, 2022.

10. There will be no prejudice to any party in respect of the requested interim distribution as it is being made for the purpose of administering the estate, and the fees sought by Applicant will be subject to final review and objection at the end of this case.

WHEREFORE, the Assignee respectfully requests that this Court enter an Order, in the form attached hereto as **Exhibit “B”**, (i) granting the Motion; (ii) approving the Applicant’s request for compensation for services rendered in the amount of **\$93,067.50** and reimbursement of expenses in the amount of **\$4,324.99**, (iii) authorizing the Assignee to pay the Applicant the sum of **\$96,392.49** representing the fees and expenses awarded; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: August 19, 2022

NARDELLA & NARDELLA, PLLC
Co-General Counsel for Assignee
135 W. Central Blvd., Ste. 300
Orlando, FL 32801
Telephone: (407) 966-2680

By: /s/ Paul N. Mascia

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on August 19, 2022 to all parties that have entered an appearance in this case; on counsel for the Assignors, Adam Losey, Esq., Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804, via email to alosey@losey.law; via email to cbl44@jud11.flcourts.org pursuant to CBL Rule 2.2; and via e-mail to all creditors and interested parties on the e-mail service list pursuant to the Notice Procedures Order.

By: /s/ Samuel J. Capuano
Samuel J. Capuano

EXHIBIT A
(Invoices)



135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

INVOICE

Invoice # 9678
Date: 03/12/2022

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
02/11/2022	JS	Conferencing with Michael Nardella and Paul Mascia regarding strategy and plan of action for ABC case and first day filings; work on filing petition for ABC and related filings	2.50
02/11/2022	MN	Prepare petition and finalize schedules	0.30
02/11/2022	MN	Strategy regarding filing of assignment	0.50
02/11/2022	KC	Electronically file Civil Cover Sheet and Petition Commencing Assignment for the Benefit of Creditors.	0.40
02/11/2022	KC	Email correspondence to client [REDACTED].	0.10
02/11/2022	MRS	Reviewing case facts in preparation of petition for assignment of benefit of creditors	0.60
02/11/2022	MRS	Draft motion to Employ Attorney	0.70
02/11/2022	MRS	Draft motion to Determine Assignee Bond and review assets in petition.	0.70
02/11/2022	MRS	Draft Notice of Assignment	0.40
02/11/2022	MRS	Review requirements for consolidation of all Crystal Cruises matters.	0.30
02/11/2022	PNM	Preparing engagement letter	0.20

02/11/2022	PNM	Reviewing matter, opening file and related organization of client documents in preparation of filing assignment for benefit of creditor petition	0.40
02/11/2022	PNM	Telephone conference with client re [REDACTED]	0.20
02/11/2022	PNM	Reviewing assignor exhibits on assets and liabilities	0.40
02/11/2022	PNM	Preparing petition for assignment for benefit of creditors	0.20
02/11/2022	PNM	Preparing civil cover sheet and reviewing related rules re business court filing and notice of related cases	0.20
02/11/2022	PNM	Reviewing miami-dade local rules re filing procedures for assignment of benefit of creditors	0.30
02/11/2022	PNM	Initial preparation of Motion to Determine Bond	0.30
02/11/2022	PNM	Correspondence from assignor re peninsula petroleum garnishment	0.10
02/11/2022	PNM	Reviewing peninsula petroleum docket and related garnishment pleadings	0.40
02/11/2022	PNM	Reviewing memorandum of law re garnishment of branch deposits versus entire deposit of assignor account related to peninsula petroleum garnishment	0.20
02/11/2022	PNM	Correspondence from and to assignor CA employment litigation counsel re status of abc proceeding and related impact on pending litigation and claim of lawfirm against assignor	0.20
02/11/2022	PNM	Telephone conference with assignor counsel re impact of abc proceeding on pending CA employment litigation	0.30
02/11/2022	PNM	Correspondence from and to assignor re management of ships, termination of related agreements and related impact on property insurance	0.10
02/11/2022	PNM	Telephone call with client re [REDACTED]	0.30
02/11/2022	PNM	Correspondence from and to assignor re freedom fresh garnishment of assignor account	0.10
02/11/2022	PNM	Correspondence from opposing counsel re freedom fresh garnishment and related review of matter	0.30
02/11/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
02/11/2022	PNM	Reviewing property insurance needs and preparation of memo to file re same	0.20
02/11/2022	MRS	Strategize about applicability and need for certain first-day motions	0.40
02/11/2022	MRS	Review other motions to consolidate and look for applicability to case at hand.	0.70
02/11/2022	MRS	Review other motions to retain counsel by assignee and look for applicability.	0.60
02/11/2022	MRS	Draft Notice of Assignment	0.50
02/14/2022	MN	Call with Adam Losey regarding potential role as special counsel on multiple matters	0.60

02/14/2022	MN	Emails regarding counsel for CA landlord	0.10
02/14/2022	MN	Review and respond to emails regarding garnishment of funds from BOA	0.40
02/14/2022	PNM	Reviewing peninsula petroleum matter and related pleadings and writ of garnishment to mfug bank	0.30
02/14/2022	PNM	Correspondence from potential claimant csc corporate domain	0.10
02/14/2022	PNM	Further reviewing peninsula petroleum matter and required maritime expert	0.20
02/14/2022	PNM	Correspondence from and to assignor re employment claim	0.10
02/14/2022	PNM	Correspondence from and to assignor re collection matter	0.10
02/14/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
02/14/2022	PNM	Reviewing lease deposit claim for CA lease	0.10
02/14/2022	PNM	Reviewing lease deposit claim for FL lease	0.10
02/14/2022	PNM	Further review of insurance matters	0.20
02/14/2022	PNM	Correspondence from secured lienor on ships	0.10
02/14/2022	PNM	Correspondence from and to assignor re CA employment litigation	0.10
02/14/2022	PNM	Correspondence from assignor and to client re [REDACTED]	0.10
02/14/2022	PNM	Correspondence from assignor counsel re obligations and set offs under BBC agreement	0.10
02/14/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/14/2022	PNM	Initial review of BBC agreements from assignor counsel	0.10
02/14/2022	PNM	Correspondence from assignor re csc corporate domain claim	0.10
02/14/2022	PNM	Correspondence from ship entity counsel re ship liquidator claim to currency and tpp situated on ships	0.10
02/14/2022	PNM	Correspondence from and to assignor re assignee not substituting as defendant in pending litigation against assignor	0.10
02/14/2022	PNM	Reviewing demand from CA landlord re rent due and application of security deposit and letter of credit	0.10
02/14/2022	PNM	Correspondence from and to assignor re list of pending litigation with assignor as either plaintiff or defendant	0.10
02/14/2022	PNM	Telephone conference with boa counsel re freedom fresh and peninsula petroleum garnishments	0.20
02/14/2022	PNM	Reviewing peninsular petroleum garnishment matter and related next steps	0.10
02/14/2022	PNM	Correspondence from freedom fresh counsel re garnishment matter	0.10
02/14/2022	PNM	Correspondence from and to boa counsel re peninsula petroleum garnishment	0.10

02/14/2022	PNM	Correspondence to special counsel re CA lease	0.10
02/14/2022	PNM	Correspondence from and to assignor re CA lease	0.10
02/14/2022	PNM	Correspondence from and to assignor re collateral for letter of credit related to CA lease	0.10
02/14/2022	PNM	Review and analysis of pending litigation spreadsheet and preparing memorandum to file re same	0.20
02/14/2022	PNM	Correspondence from and to assignor re bond company claim	0.10
02/14/2022	PNM	Reviewing CA lease, amendments, guaranty and letter of credit securing guaranty	0.20
02/14/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/14/2022	PNM	Review and analysis of NDTX district court case garnishment writs and related complaint	0.10
02/14/2022	PNM	Review and analysis of SDFL district court case complaint	0.10
02/14/2022	PNM	Review and analysis of CDCA district court case garnishment writs and related complaint	0.10
02/14/2022	PNM	Preparing memorandum to client re [REDACTED]	0.20
02/14/2022	PNM	Correspondence from and to DNB counsel re claim of secured interest in Assignor personalty and currency	0.10
02/14/2022	PNM	Telephone conference with client re [REDACTED]	0.20
02/15/2022	MN	Call with client regarding [REDACTED]	0.20
02/15/2022	MN	Call with client regarding [REDACTED]	0.80
02/15/2022	PNM	Telephone call with client re [REDACTED]	0.10
02/15/2022	PNM	Correspondence from and to boa counsel re peninsula petroleum garnishment	0.10
02/15/2022	PNM	Telephone conference with bank of america counsel and freedom fresh counsel re peninsula petroleum matter	0.50
02/15/2022	PNM	Telephone call from peninsula petroleum counsel re garnishment matter	0.10
02/15/2022	PNM	Telephone call from clerk of court re filing and nature of multiple cases	0.10
02/15/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/15/2022	PNM	Correspondence from assignor and to client re [REDACTED]	0.10
02/15/2022	PNM	Correspondence from and to assignor re amendment to letter of credit for california lease and correspondence to special counsel re same	0.10
02/15/2022	PNM	Correspondence from bank of america counsel and peninsula petroleum counsel re application of writ to assignor account	0.10

02/15/2022	PNM	Correspondence from and to claimant kosovych	0.10
02/15/2022	PNM	Correspondence to special counsel re first amendment to CA lease	0.10
02/16/2022	KC	Prepare Notice of Related Cases	0.40
02/16/2022	KC	Phone call to clerk's office regarding assignment of case to Complex Business Litigation court.	0.20
02/16/2022	MRS	Preparing Motion to Consolidate.	0.90
02/16/2022	MN	Emails with special counsel regarding CA lease	0.10
02/16/2022	MN	Calls regarding motion to transfer	0.30
02/16/2022	MN	Call regarding potential sale	0.20
02/16/2022	MN	Emails with co-counsel regarding recording of assignment	0.10
02/16/2022	PNM	Preparing notice of related cases	0.10
02/16/2022	PNM	Correspondence to special maritime counsel re representation of assignee in peninsula petroleum maritime writ matter	0.10
02/16/2022	PNM	Correspondence from freedom fresh counsel re motion for temporary restraining order	0.10
02/16/2022	PNM	Reviewing freedom fresh motion for temporary restraining order	0.10
02/16/2022	PNM	Correspondence to special maritime counsel re representation of assignee in freedom fresh maritime matter	0.10
02/16/2022	PNM	Correspondence from and to assignor and to special counsel re CA lease dispute	0.10
02/16/2022	PNM	Reviewing engagement letter from special maritime counsel in preparation of motion to employ	0.10
02/16/2022	PNM	Preparing motion to consolidate three assignment cases	0.30
02/16/2022	PNM	Correspondence to special counsel for CA lease re nature of collateral for letter of credit	0.10
02/17/2022	SN	Submit Request for Electric Recording of the Assignment for Crystal Cruises, LLC.	0.30
02/17/2022	MN	Calls regarding recording assignment, division of labor, and upcoming deadlines	0.60
02/17/2022	MRS	Research liability surrounding possession of gambling equipment in Florida and preparation of memo to file re same and applicable regulatory provisions	1.70
02/17/2022	MN	Prepare for meeting with client and assignee	0.40
02/17/2022	MN	Prepare for and attend conference call with assignee and co-counsel regarding first day motions, initial emergencies, and litigation strategy	1.80
02/17/2022	PNM	Instructions to staff re recording assignment as required by statute	0.10

02/17/2022	PNM	Reviewing matter re notice of assignment publication and filing requirement	0.10
02/17/2022	PNM	Preparing notice of assignment	0.20
02/17/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/17/2022	PNM	Correspondence from and to assignor counsel in ca employment litigation matter	0.10
02/17/2022	PNM	Reviewing matter re applicability of gaming regulations to assignee activity	0.10
02/17/2022	PNM	Preparing comprehensive status and next steps memorandum for client	0.80
02/17/2022	PNM	Correspondence from and to co-counsel re matter status	0.10
02/17/2022	PNM	Correspondence from and to belguim counsel re potential substitution of assignee as plaintiff	0.10
02/17/2022	PNM	Correspondence from freedom fresh counsel re temporary restraining order status conference	0.10
02/17/2022	PNM	Correspondence from and to special counsel re CA lease matter	0.10
02/17/2022	PNM	Reviewing temporary restratining order language exempting assignee property from scope of order	0.10
02/17/2022	PNM	Reviewing docket re status of motion to transfer	0.10
02/17/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	1.60
02/18/2022	MN	Review and revise first day motions	0.70
02/18/2022	MN	Review rescission of TRO	0.10
02/18/2022	MN	Review and respond to emails from c-counsel regarding first day motions	0.10
02/18/2022	MN	Review motion to set bond	0.10
02/18/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/18/2022	PNM	Correspondence from freedom fresh counsel re dissolution of temporary restraining order	0.10
02/18/2022	PNM	Correspondence from and to co-counsel re motion to determine bond and motions to employ	0.10
02/18/2022	PNM	Correspondence to co-counsel re notices of related cases	0.10
02/18/2022	PNM	Finalizing notice of related cases	0.10
02/18/2022	PNM	Reviewing ucc register re secured party liens	0.10
02/18/2022	PNM	Telephone conference with co-counsel re motions to employ, motions to determine bond, notices of assignment and related matters	0.30
02/18/2022	PNM	Correspondence from and to client re [REDACTED] [REDACTED]	0.10

02/18/2022	PNM	Telephone conference with arbitrator of customer claims re impact of assignment on pending claims	0.30
02/18/2022	PNM	Preparing motion to set bond	0.40
02/18/2022	PNM	Telephone conference with assignor counsel re motion to set bond and special counsel matters	0.30
02/18/2022	PNM	Telephone conference with client re [REDACTED]	0.30
02/18/2022	PNM	Preparing motion to employ	0.60
02/18/2022	PNM	Correspondence from and to assignor counsel re motion to approve bond	0.10
02/18/2022	PNM	Telephone call from bank of america counsel re additional assignor accounts	0.10
02/18/2022	PNM	Correspondence from bank of america counsel re assignor accounts	0.10
02/18/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/18/2022	PNM	Correspondence from and to co-counsel re motion to employ	0.10
02/18/2022	PNM	Reviewing and organizing next tasks in administration and related ancillary litigation and disputes	0.20
02/18/2022	PNM	Preparing notice of assignment for filing in assignor litigation matters	0.40
02/18/2022	PNM	Correspondence from independent order of foresters counsel re alleged security interest in deposit	0.10
02/19/2022	PNM	Corrspondence from and to paga claimant	0.10
02/21/2022	MN	Review task list	0.20
02/21/2022	MN	Call with client regarding [REDACTED]	0.80
02/21/2022	PNM	Finalizing motion to employ for filing	0.20
02/21/2022	PNM	Finalizing motion to set bond for filing	0.20
02/21/2022	PNM	Correspondence to special counsel re az litigation	0.10
02/21/2022	PNM	Telephone call from co-counsel re pending motions and foresters matter	0.20
02/21/2022	PNM	Correspondence to foresters counsel re claim for funds	0.10
02/21/2022	PNM	Telephone conference with client and co-counsel re [REDACTED]	0.90
02/22/2022	KC	Review Notice of Appearance by Cincinnati Insurance Company.	0.10
02/22/2022	KC	Review Notice and Order on Motion and Memorandum Requirements and tickle deadlines.	0.10
02/22/2022	KC	Review Notice and Order of Adherence to Complex Business Litigation Section Procedures.	0.10
02/22/2022	KC	Review Mandatory Order to Confer and Certification Requirement.	0.10

02/22/2022	KC	Review Notice of Special Set Hearing and calendar Initial Case Management Conference.	0.10
02/22/2022	MRS	Strategize as to approach to Forester claim/lein.	0.70
02/22/2022	MRS	Review Amendment 3's language as to interest created in favor of Foresters.	0.70
02/22/2022	KC	Review Order Setting Initial Case Management Conference and calendar deadlines	0.20
02/22/2022	PNM	Reviewing court filings for correction	0.10
02/22/2022	PNM	Telephone conferene with belgium counsel re pending claims conveyed to assignee and next steps in related litigation	0.40
02/22/2022	PNM	Reviewing security interest or equitable lien claim of forresters	0.30
02/23/2022	MRS	Review original Group 1 contract for 90-day language regarding Forester language.	0.80
02/23/2022	KC	Review Notice of Rescheduled Initial Case Management Conference and update calendar.	0.10
02/23/2022	KC	Review Order Resetting Initial Case Management Conference and update calendar deadlines.	0.10
02/23/2022	PNM	Reviewing notice of hearing and related case management order	0.10
02/24/2022	MN	Review security interest claims from Foresters and emails re same	0.60
02/24/2022	KC	Review 2nd Notice of Rescheduled Initial Case Management Conference and update calendar.	0.10
02/24/2022	KC	Review 2nd Order Resetting Initial Case Management Conference and update calendar deadlines.	0.10
02/24/2022	MRS	Review and analysis of Forester contracts to determine which rights if any were created as to customer deposits and preparation of memorandum to file re same	1.30
02/24/2022	MRS	Research creation of equitable liens and security interest under 727.	1.30
02/24/2022	MRS	Review and strategize about application of research to inconsistencies of various Forester contracts and amendments.	0.70
02/24/2022	MN	Call with client regarding [REDACTED]	0.20
02/24/2022	MRS	Review affiliated litigation and begin the organization of chart for affiliated counsel.	2.20
02/24/2022	MN	Conference call with client and co-counsel regarding [REDACTED]	1.10
02/24/2022	PNM	Correspondence from and to foresters counsel re foresters claim	0.10
02/24/2022	PNM	Reviewing foresters contract with assignor, first amendment to contract, second amendment to contract, third amendment to contract and preparation of memo to file re same	0.50

02/24/2022	PNM	Reviewing proposed agreed motion regarding foresters demand including schedule of prior payments and preparation of memo to file re same	0.30
02/24/2022	PNM	Preparing memorandum to file re required elements for a lien and consensual lien holder under relevant statutes, application to forrester demand and related issues	0.40
02/24/2022	PNM	Preparing litigation status spreadsheet for various disputed claims and ancillary litigation matters	0.20
02/24/2022	PNM	Reviewing creation of security interest, perfection of security interest, applicability to equitable liens and related ucc provisions re foresters demand	0.50
02/24/2022	PNM	Reviewing outstanding tasks in preparation of client conference	0.20
02/24/2022	PNM	Reviewing special counsel engagement letter of Losey Law and correspondence from and to special counsel re same	0.10
02/24/2022	PNM	Reviewing court orders re case management, status conference and related business court requirments	0.10
02/24/2022	PNM	Correspondence from and to assignor counsel in ca employment litigation matter re suggestion of abc proceeding	0.10
02/24/2022	PNM	Reviewing motion to amend claims and notice process	0.10
02/24/2022	PNM	Telephone conference with client re [REDACTED]	0.80
02/24/2022	PNM	Reviewing matter re recording assignments in additoinal jurisdictions where assets located	0.10
02/24/2022	PNM	Correspondence from and to co-counsel re agreed order transferring venue	0.10
02/25/2022	MN	Review and respond to emails regarding intellectual property claims	0.20
02/25/2022	MN	Review and respond to emails from Young Conaway about potential purchase of assets from Crystal	0.10
02/25/2022	MN	Communications regarding intellectual property	0.10
02/25/2022	MN	Emails regarding potential purchaser of assets	0.10
02/25/2022	MN	Call with IP counsel regarding potential claw back of IP from IOM shell company	0.40
02/25/2022	MRS	Additional legal research on applicability of equitable liens and related security in assignment for benefit of creditor context	1.40
02/25/2022	PNM	Correspondence from and to assignor counsel re suggestion of abc proceeding	0.10
02/25/2022	PNM	Reviewing motion to amend notice procedures	0.10
02/25/2022	PNM	Correspondence from and to special counsel for CA litigation re engagement terms	0.10
02/25/2022	PNM	Correspondence to client re [REDACTED]	0.10

02/25/2022	PNM	Telephone conference with arbitrator of several claims against assignor re suggestion of abc proceeding and abc claim process	0.30
02/25/2022	PNM	Telephone call from maritime special counsel re poa requested by uruguay counsel and related disposition of abc assets on vessel	0.30
02/25/2022	PNM	Correspondence to arbitrator re petition for abcy proceeding and suggestion of abc proceeding	0.10
02/25/2022	PNM	Correspondence from and to co-counsel re forresters claim	0.10
02/25/2022	PNM	Telephone conference with IP counsel re assignee claim in assignor intellectual property and trademarks	0.60
02/25/2022	PNM	Telephone conference with co-counsel re forresters demand and threatened injunction	0.20
02/25/2022	PNM	Telephone conference with forresters counsel re claim of interest in assignee funds	0.30
02/25/2022	PNM	Research re application of equitable lien in funds transferred by assignor to assignee including review and analysis of related cases	0.50
02/25/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.50
02/25/2022	PNM	Correspondence to client re [REDACTED]	0.10
02/25/2022	PNM	Correspondence from and to foresters counsel re tro motion and related interim settlement proposal	0.10
02/25/2022	PNM	Correspondence from and to co-counsel re foresters proposal to withdraw tro motion and next steps	0.20
02/25/2022	PNM	Review and analysis of Foresters TRO motion and preparation of memorandum to file re response to same	0.70
02/26/2022	PNM	Initial research re response to Foresters motion for temporary injunction	0.30
02/26/2022	PNM	Correspondence from and to co-counsel re strategy for response to Foresters motion for temporary injunction	0.10
02/28/2022	MN	Continued research on claims for title to funds from Foresters	0.70
02/28/2022	MRS	Case law research on whether Assignee qualifies as bona fide purchaser for value	0.80
02/28/2022	MRS	Case law research on when title to cash held in escrow pass to Assignee.	0.60
02/28/2022	MRS	Shephardize Scott v. Nat'l City Bank regarding status of bona fide purchaser for value	0.70
02/28/2022	MRS	Shephardize Kitchens v. Kitchens regarding statutory adoption and status of bona fide purchaser for value.	0.60
02/28/2022	MRS	Summarize application of Moecker v. Honeywell re assignee claim in forester deposits	0.40

02/28/2022	MRS	Research and review creation of trustee status via escrow agreement - particularly SMP, Ltd. v. Syprett, Meshad, Resnick & Lieb, P.A., 584 So. 2d 1051, 1052 (Fla. 2d DCA 1991)	0.70
02/28/2022	MRS	Case law research requirement for third party as escrow agents	0.40
02/28/2022	MRS	Case law research re requirement for express acceptance of escrow agent	0.80
02/28/2022	KC	Review Notice of Hearing on Emergency Motion for Temporary Injunction and calendar.	0.10
02/28/2022	MRS	Research elements for valid escrow agreement.	0.30
02/28/2022	MRS	review and pull relevant holdings from: SMP, Ltd. v. Syprett, Meshad, Resnick & Lieb, P.A., 584 So. 2d 1051, 1052 (Fla. 2d DCA 1991); Ullendorff v. Graham, 80 Fla. 845, 845, 87 So. 50, 51 (1920); and United Am. Bank v. Seligman, 599 So. 2d 1014, 1015 (Fla. 5th DCA 1992)	0.40
02/28/2022	MRS	Research case law regarding delivery or transfer of assets in relation to the creation of a trust relationship	0.60
02/28/2022	MRS	Case law research on accepting purchase deposit in relation to the creation of fiduciary responsibility.	0.70
02/28/2022	MRS	Case law research on the survival of fiduciary relationships after an assignment for benefit of creditors.	0.30
02/28/2022	MRS	Case law research for applicability of effective stay on assets by a creditor as a remedy for breach of fiduciary duty.	0.20
02/28/2022	MRS	Case law research pertaining to implied fiduciary duties under assignment for benefit of creditors statutes	0.40
02/28/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.70
02/28/2022	MRS	Draft summary of fiduciary relationship re foresters deposits	0.80
02/28/2022	PNM	Research and analysis re bonafide purchaser for value status of assignee, nature of title in cash promised for escrow but not delivered into escrow and preparing memo to file re same	0.40
02/28/2022	PNM	Research and analysis re nature of trust arrangement in funds deposited by foresters	0.30
02/28/2022	PNM	Telephone conference with co-counsel re issues, research, argument and strategy for response to foresters motion for temporary injunction	0.50
02/28/2022	PNM	Reviewing motion to extend timeframe for conducting assignor examination and correspondence from and to co-counsel re same	0.10
02/28/2022	PNM	Correspondence from co-counsel re potential purchaser for abc estate assets	0.10
02/28/2022	PNM	Correspondence from and to special counsel re funding proposal for az litigation	0.10
02/28/2022	PNM	Correspondence from court re motion for adjusted notice and claims process	0.10

02/28/2022	PNM	Reviewing notice of appearance for counsel for Distributions BMB 1985 SEC	0.10
02/28/2022	PNM	Correspondence from and to distributions bnb counsel	0.10
02/28/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.70
Quantity Subtotal			76.1
Services Subtotal			\$27,735.00

Expenses

Date	Description	Quantity	Rate	Total
02/11/2022	Petition filing fee (E-Portal, Miami-Dade clerk)	1.00	\$406.00	\$406.00
02/17/2022	E124 Other: Fee for electronic recording of Assignment from Crystal Cruises, LLC, to client.	1.00	\$74.25	\$74.25
Expenses Subtotal				\$480.25

Time Keeper	Quantity	Rate	Total
Paul Mascia	33.1	\$425.00	\$14,067.50
Michael A. Nardella	12.6	\$450.00	\$5,670.00
Matthew Silbernagel	25.3	\$250.00	\$6,325.00
Jonathan Sykes	2.5	\$450.00	\$1,125.00
Karen Cooper	2.3	\$225.00	\$517.50
Stephen Nardella	0.3	\$100.00	\$30.00
Quantity Total			76.1
Subtotal			\$28,215.25
Total			\$28,215.25

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21

9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
Outstanding Balance				\$96,392.49
Total Amount Outstanding				\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
				IOLTA Trust Account Balance	\$0.00	

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.



INVOICE

Invoice # 9828
Date: 04/11/2022

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
03/01/2022	MN	Call regarding second request for TRO on alleged deposits	0.20
03/01/2022	MN	Review response in opposition to motion for TRO and emails re edits to same	0.30
03/01/2022	KC	Review Notice of Special Set Hearing; and update calendar as to motions to be heard	0.10
03/01/2022	MRS	Continue compiling litigation tracker and review all open and recently closed litigation within state court, federal court, and international courts	1.90
03/01/2022	MRS	Research additional open litigation and claimants in state, federal, and international courts.	1.70
03/01/2022	PNM	Correspondence from and to co-counsel re assignor consent to motion to extend time for assignor examination	0.10
03/01/2022	PNM	Telephone conference with distributions bmb counsel	0.40
03/01/2022	PNM	Telephone conference with co-counsel re first day motions hearing agenda	0.10
03/01/2022	PNM	Preparing argument for hearing on motion to determine bond	0.20
03/01/2022	PNM	Telephone conferences with client re [REDACTED] [REDACTED] [REDACTED]	0.50

03/01/2022	PNM	Preparing argument for hearing on motion to employ	0.10
03/01/2022	PNM	Telephone conference with co-counsel re foresters motion for temporary restraining order	0.10
03/01/2022	PNM	Preparation of response to foresters motion for temporary restraining order telephone call with co-counsel re same	0.30
03/01/2022	PNM	Correspondence to client re [REDACTED]	0.10
03/02/2022	MN	Prepare for today's emergency hearing	2.20
03/02/2022	MN	Appear for and attend hearing on first day motions and motion for preliminary injunction	1.80
03/02/2022	MN	Review and respond to emails regarding potential assets on ships	0.40
03/02/2022	KC	Review notification from court and calendar anticipated Motion to Strike hearing.	0.10
03/02/2022	PNM	Preparing litigation spreadsheet	0.20
03/02/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.70
03/02/2022	PNM	Preparing for hearing on motions to appoint counsel, determine bond, amend notice procedures and timelines, extend time to conduct debtor exam and foresters motion for temporary restraining order	0.90
03/02/2022	PNM	Attendance at hearing on motions to appoint counsel, determine bond, amend notice procedures and timelines, extend time to conduct debtor exam and foresters motion for temporary restraining order	1.80
03/02/2022	PNM	Reviewing proposed orders granting motions to appoint counsel, determine bond, amend notice procedures and timelines, extend time to conduct debtor exam and foresters motion for temporary restraining order	0.10
03/03/2022	MRS	Complete review of remaining open cases involving Crystal Cruises.	2.30
03/03/2022	PNM	Telephone call from boa counsel re assignor accounts	0.20
03/03/2022	PNM	Reviewin court notices for hearing on assignee motion to strike	0.10
03/04/2022	KC	Retrieve and download all signed orders from March 2, 2022 hearing.	0.10
03/04/2022	PNM	Correspondence from and to distributions bmb counsel re claim	0.10
03/04/2022	PNM	Correspondence from and to boa counsel re payment due from assignor accounts	0.10
03/04/2022	PNM	Correspondence to client re [REDACTED]	0.10
03/04/2022	PNM	Reviewing noa from hellman worldwide logistics and orders granting motion to consolidate, motions to employ, motion to amend notice procedures, motion to set bond and motion to extend time for assignor examination	0.20
03/04/2022	PNM	Preparing litigation and dispute spreadsheet	0.10

03/07/2022	MN	Review motion to employ Losey Law	0.10
03/07/2022	MRS	Edit Litigation Tracker Spreadsheet ahead of meeting with co-counsels.	0.40
03/07/2022	MN	Call regarding trust account minimum and other claims related to same	1.20
03/07/2022	PNM	Correspondence to belguim counsel re related claim for evaluation by assingor	0.10
03/07/2022	PNM	Lit spreadsheet	0.10
03/07/2022	PNM	Preparing motion to employ losey as special counsel for consumer and california law matters	0.70
03/07/2022	PNM	Preparing motion to employ phelps dunbar as special counsel for maritime matters	0.50
03/07/2022	PNM	Review and analysis of peninsula petroleum litigation in southern district of texas and updating litigation spreadsheet re same	0.20
03/07/2022	PNM	Review and analysis of peninsula petroleum litigation in northern district of texas and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of peninsula petroleum litigation in southern district of florida and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of peninsula petroleum litigation in central district of california and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of belgium litigation and updating litigation spreadsheet re same	0.20
03/07/2022	PNM	Review and analysis of marana litiagation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of douglass litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of breier paga litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of breier employment litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of kosovych litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of rothman litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of alevy litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of rosenberg litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Review and analysis of elderhostel litigation and updating litigation spreadsheet re same	0.10

03/07/2022	PNM	Review and analysis of freedom fresh litigation and updating litigation spreadsheet re same	0.10
03/07/2022	PNM	Telephone conference with client re [REDACTED]	1.00
03/08/2022	MN	Call with counsel for Assignor regarding examination and collection of funds from Arizona	0.30
03/08/2022	MN	Call with Assignee regarding letter of credit, claim on \$3.5MM in deposits, and issues with collecting on Arizona judgment	0.70
03/08/2022	KC	Review Notice of Examination of Assignor and calendar.	0.10
03/08/2022	KC	Draft Motion to Employ Bahama attorneys.	0.30
03/08/2022	MN	Review email from customer regarding information on system and proper contact	0.10
03/08/2022	PNM	Telephone call from maritime counsel re status of peninsula petroleum litigation in southern district of florida	0.10
03/08/2022	PNM	Reviewing notice of appearance for breier counsel	0.10
03/09/2022	MN	Review litigation chart and all outstanding litigation	0.10
03/09/2022	PNM	Telephone call to attorney karcher re claim	0.10
03/10/2022	MN	Review letters of credit and issues with funds as collateral, up to \$3.8MM and review lease and amendments and consider potential declaratory	1.90
03/10/2022	KC	Create DropBox link to share all pleadings in all 3 assignment cases with Nadira Joseph.	0.30
03/10/2022	PNM	Reviewing matter re himmaright claim inquiry	0.10
03/10/2022	PNM	Telephone conference with co-counsel re motions to employ and coordination of hearing for same	0.10
03/10/2022	PNM	Revising and updating litigation spreadsheet	0.20
03/10/2022	PNM	Reviewing CA lease matter re claim amount, related lease provisions, and potential to recover collateral held in name of affiliate but provided by assignor	0.40
03/10/2022	PNM	Telephone conference with client re [REDACTED]	1.10
03/10/2022	PNM	Correspondence from and to assignor belgium counsel re substitution of assignee	0.10
03/10/2022	PNM	Correspondence from peninsula petroleum counsel re claim	0.10
03/10/2022	PNM	Correspondence from assignor re belgium action and confirmation of assignee rights in and to same	0.10
03/11/2022	KC	Further draft Motion to Employ Bahama attorneys.	0.40
03/11/2022	KC	Revise Certificate of Service and electronically file Motion to Employ Losey.	0.30

03/11/2022	PNM	Correspondence from and belgium counsel re potential substution of assignee as plaintiff	0.10
03/11/2022	PNM	Reviewing notice of appearance for gara and atlantik counsel	0.10
03/11/2022	PNM	Preparing motion to employ bahammas counsel	0.90
03/11/2022	PNM	Finalizing motion to employ losey as special counsel	0.10
03/11/2022	PNM	Finalizing motion to employ phelps dunbar as special counsel	0.20
03/11/2022	PNM	Correspondence to assignor counsel re consent to motion to employ special counsel for CA, AZ and maritme matters	0.10
03/11/2022	PNM	Telephone conference with client re [REDACTED]	0.20
03/11/2022	PNM	Correspondence to co-counsel re coordination of hearing on various motions to employ special counsel	0.10
03/11/2022	PNM	Correspondence to assignor counsel re consent to motion to employ bahamas counsel	0.10
03/12/2022	PNM	Reviewing matter status, relevant issues and next steps in assignment proceeding	0.20
03/14/2022	MN	Review information regarding letter of credit in CA	0.30
03/14/2022	MRS	Edit litigation tracker	0.20
03/14/2022	MN	Review and respond to correspondence regarding IP agreements	0.10
03/14/2022	MN	Review and respond to email from attorney for creditor regarding charge backs	0.10
03/14/2022	MN	Emails with counsel for creditor regarding claim and status of claim process	0.10
03/14/2022	MN	Review and confer regarding letter of credit and possible account collateral	0.50
03/14/2022	PNM	Correspondence from assignor counsel in breier matter re withdrawal	0.10
03/14/2022	PNM	Preparing for conference with client and co-counsel re [REDACTED]	0.30
03/15/2022	PNM	Correspondence from and to belgium counsel re substitution of assignee as plaintiff	0.20
03/15/2022	PNM	Correspondence from co-counsel re breier claim and related insurance documentation	0.10
03/15/2022	PNM	Correspondence from and to roberston re claim	0.10
03/15/2022	PNM	Correspondence from bmb distributors re proof of claim	0.10
03/16/2022	MN	Call with client regarding [REDACTED]	0.70
03/16/2022	KC	Review Notice of Hearing on Motions to Employ and calendar.	0.10
03/16/2022	PNM	Correspondence from and to claimaint roberston	0.10

03/16/2022	PNM	Correspondence to assignor counsel re motion to employ bahamas counsel	0.10
03/16/2022	PNM	Reviewing notice of hearing on motions to employ losey and phelps dunbar	0.10
03/16/2022	PNM	Correspondence from and to co-counsel re status of assignor assets located on vessels	0.10
03/17/2022	KC	Review Corrected Notice of Hearing on Motions to Employ and update calendar.	0.10
03/17/2022	KC	Confirm Zoom instructions for Motions to Employ hearing and update calendar.	0.10
03/17/2022	KC	Electronically file Motion to Employ Parris Whittaker.	0.30
03/17/2022	PNM	Correspondence from assignor counsel re motion to employ bahamas counsel and instructions to staff re same	0.10
03/18/2022	KC	Review Notice of Hearing on Motion to Employ Parris and update calendar.	0.10
03/18/2022	MN	Review argument related to resulting or constructive trust for claim by Foresters	0.10
03/18/2022	PNM	Reviewing notice of appearance for ceyhan counsel	0.10
03/20/2022	MN	Review and respond to emails regarding insurance coverage	0.10
03/20/2022	PNM	Correspondence from breier counsel re insurance demand	0.10
03/21/2022	MN	Continued discussions with client regarding [REDACTED]	0.90
03/21/2022	PNM	Reviewing matter status and organizing next steps	0.10
03/21/2022	PNM	Reviewing proof of claim by ceyhan and related correspondence from and to ceyhan counsel re same	0.10
03/21/2022	PNM	Reviewing notice of appearance for counsel for claimant dalgic	0.10
03/21/2022	PNM	Reviewing mgrath demand and correspondence from and to co-counsel re response to same	0.10
03/21/2022	PNM	Preparing assignor examination outline and correspondence to co-counsel re revisions to same	0.40
03/21/2022	PNM	Reviewing matter re assignee claim in intellectual property utilized by assignor and correspondence to co-counsel re same	0.10
03/21/2022	PNM	Telephone conference with client re [REDACTED]	0.90
03/22/2022	MN	Emails with counsel for Genting re line of credit	0.10
03/22/2022	PNM	Telephone conference with belgium counsel re nature of assignor claim, liability assessment, potential damages, court process, subrogation issues and related matters in evaluation of viability of substitution by assignee as plaintiff	1.10
03/22/2022	PNM	Correspondence from and to co-counsel re status of assignor rights in intellectual property and related additional required information	0.10

03/22/2022	PNM	Reviewing claim filed by surles	0.10
03/23/2022	PNM	Preparing for and attendance at hearing on motion to employ phelps dunbar, motion to employ parris whitaker and motion to employ losey	0.90
03/23/2022	PNM	Correspondence from and to bmb disributions counsel	0.10
03/23/2022	PNM	Correspondence from claimant bell re consumer claim	0.10
03/23/2022	PNM	Preparing memorandum regarding status of belgium litigaiton, evaluation of claim and next steps in matter	0.50
03/23/2022	PNM	Reviewing orders granting motions to employ special counsel	0.20
03/23/2022	PNM	Correspondence from and to boa counsel re payment from assignor accounts	0.10
03/24/2022	MN	Call regarding lease terms and amounts due under lease in Miami	0.20
03/24/2022	MN	Call with client regarding [REDACTED]	0.90
03/24/2022	MN	Review Purchase and Sale agreement related to Miami lease and amounts due thereunder	1.50
03/24/2022	PNM	Telephone call with boa counsel re assignee payment obligation	0.10
03/24/2022	PNM	Reviewing matter and related correspondence re amounts owed by miami landlord under sale agreement as offset to lease obligations	0.20
03/24/2022	PNM	Correspondence from and to boa counsel re assignee payment obligation	0.10
03/24/2022	PNM	Correspondence to client re [REDACTED]	0.10
03/24/2022	PNM	Review and analysis of miami lease, related legal issues and exercised option to extend	0.50
03/24/2022	PNM	Review and analysis of purchase and sale agreement for improvements at separate building owned by miami landlord and related legal issues	0.80
03/24/2022	PNM	Review and analysis of board memorandum re sale of improvements in separate building owned by miami landlord and related legal issues	0.30
03/24/2022	PNM	Preparing memroandum to file re claim against building improvement purchaser and related claims of miami landlord	0.40
03/24/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.90
03/24/2022	PNM	Reviewing motion to authorize continuation of assignor busienss for an additional 90 days	0.10
03/25/2022	MN	Call with client regarding [REDACTED]	0.40
03/25/2022	MN	Continued calls regarding examination logistics and questions	1.00
03/25/2022	MN	Review pledge agreement	0.40
03/25/2022	PNM	Telephone conference with boa counsel re payment obligation and status of	0.20

		garnished account	
03/25/2022	PNM	Reviewing orders granting motions to employ special counsels	0.10
03/25/2022	PNM	Correspondence from and to Belgium counsel re case factors, estimated costs and conditions for assignee to substitute as plaintiff	0.20
03/25/2022	PNM	Preparing memorandum to client re [REDACTED]	0.30
03/25/2022	PNM	Reviewing notices of appearances for counsel for claimant filipovic and claimant ivanovic	0.10
03/25/2022	PNM	Preparing memorandum to client re [REDACTED]	0.20
03/25/2022	PNM	Correspondence from and to counsel for beazley insurance re breier claim	0.10
03/25/2022	PNM	Telephone conference with beazly insurance counsel re brier claim and don claim and reviewing related issues regarding duties of assignee concerning claim against assignor insurer	0.50
03/25/2022	PNM	Preparing notice of assignment of benefit for creditor proceeding and correspondence to bealy insurance counsel re same	0.10
03/25/2022	PNM	Correspondence from and to bmb distributions counsel re claim of interest in assignee account	0.10
03/25/2022	PNM	Telephone conference with bmb distributions counsel re potential settlement of claim of equitable interest in assignee funds received from citi account	0.10
03/27/2022	PNM	Travel to Miami in preparation of assignor exam	4.30
03/27/2022	MN	Prepare for and travel to Miami for examination	1.20
03/28/2022	KC	Phone call from Suzie Block re: proof of claim.	0.10
03/28/2022	MN	Prepare for and attend assignor examination	3.70
03/28/2022	PNM	Reviewing schedule of assignor related IP marks	0.10
03/28/2022	PNM	Preparing for assignor exam and conference with client re [REDACTED]	1.90
03/28/2022	PNM	Attending assignor examination	3.40
03/28/2022	PNM	Meeting with client and co-counsel re [REDACTED]	1.40
03/28/2022	PNM	Travel from assignor examination	4.30
03/28/2022	PNM	Correspondence from and to assignor insurer re breir and don claims	0.10
03/28/2022	MN	Travel from Miami to Orlando	1.20
03/29/2022	PNM	Telephone conference with counsel for assignor insurer re breir and don claims	0.30
03/30/2022	PNM	Reviewing notice of appearance and claim of claimant laptalo	0.10

03/30/2022	PNM	Reviewing order appointing phelps dunbar and correspondence to special counsel re same	0.10
03/31/2022	MN	Emails regarding landlord claims in LA and requested draw down on LOC	0.10
03/31/2022	MN	Call regarding status of outstanding matters	1.40
03/31/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1.40

Quantity Subtotal 78.0
Services Subtotal \$32,120.00

Expenses

Date	Description	Quantity	Rate	Total
03/27/2022	E110 Out-of-town travel: Hotel Accommodations in Miami - Three Attorneys	1.00	\$1,989.93	\$1,989.93
03/31/2022	E110 Out-of-town travel: Attorney Meals	1.00	\$54.28	\$54.28
Expenses Subtotal				\$2,044.21

Time Keeper	Quantity	Rate	Total
Paul Mascia	44.7	\$425.00	\$18,997.50
Michael A. Nardella	24.3	\$450.00	\$10,935.00
Matthew Silbernagel	6.5	\$250.00	\$1,625.00
Karen Cooper	2.5	\$225.00	\$562.50
Quantity Total			78.0
		Subtotal	\$34,164.21
		Total	\$34,164.21

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21
			Outstanding Balance	\$96,392.49
			Total Amount Outstanding	\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
				IOLTA Trust Account Balance	\$0.00	

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.



INVOICE

Invoice # 9992
Date: 05/09/2022

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
04/01/2022	KC	Review agreed order extending deadline and continuing hearing; and update calendar.	0.10
04/01/2022	PNM	Reviewing proof of claim from claimant sivan	0.10
04/01/2022	PNM	Correspondence from co-counsel re amex claims and agreements	0.10
04/04/2022	MN	Update regarding DLA Piper's response to lease demand	0.10
04/04/2022	MN	Review and respond to emails regarding drawdown of LOC	0.10
04/04/2022	MN	Call with client regarding [REDACTED]	1.20
04/04/2022	PNM	Correspondence from and to special counsel for CA and AZ matters re next steps in litigation	0.10
04/04/2022	PNM	Telephone confrence with comlux re payment on receivables and deposit	0.20
04/04/2022	PNM	Correspondence to comlux re claims, payment on receivables and deposit	0.10
04/04/2022	PNM	Correspondence to belgium counsel re engagement by assignee	0.10
04/04/2022	PNM	Telephone conference with client re [REDACTED]	0.30
04/04/2022	PNM	Telephone conference with client re [REDACTED]	1.30

		on improvements, belgium claim, amex status, comlux matter status, bermuda proceeding status, claims status, foresters tro hearing and related estate matters	
04/05/2022	KC	Review Miami Lease and Sale & Purchase Agreement; search Miami-Dade property appraiser for properties owned by Resorts World Omni, LLC; retrieve all corresponding deeds; notate all legal descriptions; and search for leased property owner info.	1.10
04/05/2022	PNM	Reviewing matter and instructions to staff re obtaining ownership and encumbrance reports for real property held by world resorts miami, llc as potential securit for estate claim	0.30
04/06/2022	MN	Review real estate owner entities for purposes of reviewing potential setoff	0.20
04/06/2022	PNM	Correspondence from and to co-counsel re motion for payment for administrative expenses	0.10
04/06/2022	PNM	Reviewing foresters reply to response in opposition to motion for temporary injunction	0.10
04/06/2022	PNM	Researching properties owned by world resorts miami; researching properties owned by world resorts omni; reviewing property appraiser records re same; reviewing public records re same; reviewing recorded documents to determine legal description of omni building; preparing memorandum to file re same	1.40
04/07/2022	MN	Call with client regarding [REDACTED]	0.70
04/07/2022	MN	Call regarding title to real estate for Resorts World related to potential claims	0.20
04/07/2022	KC	Prepare email to Fidelity title company requesting ownership and encumbrance reports for Resorts World Miami LLC properties.	0.20
04/07/2022	PNM	Further review of real property owned by buyer of building improvements to serve as collateral for assignee claim	0.30
04/08/2022	PNM	Correspondence from and to title company re ownership and encumbrance reports for real estate owned by building improvement buyer	0.10
04/08/2022	PNM	Correspondence from liquidating trustee for netherlands affiliate of crystal crusies	0.10
04/08/2022	PNM	Reviewing next steps in belguim litigation and substitution of assignee as plaintiff	0.10
04/08/2022	PNM	Reviewing reply in support of motion to strike foresters motion for temporary restraining order	0.10
04/11/2022	MN	Call regarding potential intellectual property documentation and issues with access to files to search for same	0.50
04/11/2022	MN	Call with client and co-counsel regarding [REDACTED]	1.30
04/11/2022	PNM	Reviewing various open matters and next step in preparation for client update conference	0.10
04/11/2022	PNM	Correspondence to belgium counsel re assignee substitution as party plaintiff	0.10

04/11/2022	PNM	Correspondence to comlux general counsel re offsetting claims and amounts owing to estate	0.10
04/11/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	1.20
04/12/2022	MN	Emails regarding potential resolution with Crystal Acquisitions	0.10
04/12/2022	MN	Call with client regarding [REDACTED] [REDACTED]	0.40
04/12/2022	MN	Call with client regarding [REDACTED] [REDACTED]	0.10
04/12/2022	PNM	Reviewing claim filed by claimant azzopardi	0.10
04/12/2022	PNM	Reviweing matter re goods supplier claim of trust interest in assignee funds	0.20
04/12/2022	PNM	Reviewing notice of appearance for sembcorp marine & upgrades counsel	0.10
04/12/2022	PNM	Review and revise initial case management report	0.20
04/12/2022	PNM	Preparing memorandum to belgium counsel re assigne claims, sharing of legal costs with vessel insurer and nature of respective interests in damages award	0.30
04/13/2022	KC	Review Notice of Hearing on Motion to Strike and Motion to Employ; and calendar.	0.10
04/13/2022	MN	Call with client regarding [REDACTED]	0.20
04/13/2022	PNM	Reviewing assignor exam transcript re claims belonging to assignee	0.10
04/13/2022	PNM	Reviewing demand letter from starboard holdings	0.10
04/13/2022	PNM	Reviewing notice of auction sale of estate assets	0.10
04/15/2022	PNM	Reviewing filed case management report and related notice correspondence	0.20
04/15/2022	PNM	Reviewing notice of assignment proceeding for ceyhan and muhlburger cases	0.10
04/18/2022	MN	Call regarding COMLUX updates	0.10
04/18/2022	MN	Call with CA counsel regarding response from DLA Piper	0.30
04/18/2022	MN	Research regarding claims of Starboard for trust assets	0.80
04/18/2022	MN	Call regarding status of matter and possible claims to intellectual property	0.90
04/18/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1.10
04/20/2022	MN	Call with counsel for Starboard regarding demand for trust documents	0.40
04/20/2022	PNM	Reviwng proof of claim for falcon	0.10
04/22/2022	MN	Communications with client regarding [REDACTED]	0.10

04/25/2022	MN	Review and respond to emails regarding arbitration clause in Arizona action	0.10
04/25/2022	MN	Call with client regarding [REDACTED]	0.60
04/25/2022	MN	Call with client and co-counsel regarding [REDACTED] [REDACTED]	0.90
04/25/2022	PNM	Correspondence to title company re staus of ownership and encumbrance reports for real property owned by building improvement buyer	0.10
04/25/2022	PNM	Correspondence to assignor re comlux agreements	0.10
04/25/2022	PNM	Correspondence to Belgium counsel re status of engagement letter	0.10
04/25/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	1.10
04/27/2022	KC	Download Resorts World's Ownership and Encumbrance Reports from title company links for 4 out 6 of the properties; process invoices; and email to title company following up on remaining 2 reports.	0.70
04/27/2022	PNM	Correspondence from and to belguim counsel and reviewing proposed engagement letter for retention by assignee	0.10
04/27/2022	PNM	Initial review of ownership and encumbrance report for real propety owned by building improvement purchaser	0.10
04/28/2022	MN	Emails regarding case management conference and status	0.20
04/28/2022	KC	Download Resorts World's Ownership and Encumbrance Reports from title company links for 1 Herald Plz; and process invoice.	0.20
04/28/2022	PNM	Correspondence to co-counsel re updates for case management update hearing	0.10
04/28/2022	PNM	Correspondence from and to co-counsel re case management hearing	0.10
04/28/2022	PNM	Reviewing notice of appearance for counsel for Kfw ipex-bank gmbh	0.10
04/29/2022	MN	Call regarding case management conference	0.10
04/29/2022	MN	Prepare for and attend case management conference	0.70
04/29/2022	PNM	Correpondence from and to belgium counsel and review of relaed proposed engagement letter	0.10
04/29/2022	PNM	Initial preparation of motion to employ belguim counsel	0.10
04/29/2022	PNM	Reviewing court statements in transcript from hearing on foresters motion to strike	0.10
04/29/2022	PNM	Correspondence from client to [REDACTED]	0.10
Quantity Subtotal			24.1
Services Subtotal			\$10,020.00

Expenses

Date	Description	Quantity	Rate	Total
04/27/2022	E124 Other: Fidelity National Title - Inv. no. 10397093 - O and E report for 360 NE 14 Ter.	1.00	\$300.00	\$300.00
04/27/2022	E124 Other: Fidelity National Title - Inv. no. 10396977- O and E report for 1100 Biscayne Blvd.	1.00	\$300.00	\$300.00
04/27/2022	E124 Other: Fidelity National Title - Inv. no. 10397012- O and E report for 1401 Biscayne Blvd.	1.00	\$300.00	\$300.00
04/27/2022	E124 Other: Fidelity National Title - Inv. no. 10396821- O and E report for parking lot parcel	1.00	\$300.00	\$300.00
04/28/2022	E124 Other: Fidelity National Title - Inv. no. 10396832- O and E report for 1 Herald Plz	1.00	\$300.00	\$300.00
			Expenses Subtotal	\$1,500.00

Time Keeper	Quantity	Rate	Total
Paul Mascia	11.4	\$425.00	\$4,845.00
Michael A. Nardella	10.3	\$450.00	\$4,635.00
Karen Cooper	2.4	\$225.00	\$540.00
		Quantity Total	24.1
		Subtotal	\$11,520.00
		Total	\$11,520.00

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
Outstanding Balance				\$96,392.49
Total Amount Outstanding				\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
				IOLTA Trust Account Balance		\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.



INVOICE

Invoice # 10355
Date: 06/15/2022

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
05/02/2022	KC	Receipt and review of Order Setting Interim Case Management Conferences; and calendar.	0.30
05/02/2022	MN	Call regarding Comlux statements and invoices	0.40
05/02/2022	MRS	Draft Motion to Employ Astrea	0.80
05/02/2022	PNM	Review and analysis of property records and ownership and encumbrance reports for various real estate parcels owned by building improvement buyer in miami-dade county and preparation of memorandum to file re same	0.40
05/02/2022	PNM	Telephone conference with client re [REDACTED]	0.50
05/02/2022	PNM	Reviewing order setting case management conferences	0.10
05/04/2022	KC	Electronically file Motion to Employ Astrea CVBA	0.10
05/04/2022	KC	Prepare service email to Adam Losey and business court service email attaching filed Motion to Employ Astrea.	0.10
05/04/2022	KC	Email correspondence with co-counsel regarding setting of a hearing on Motion to Employ Astrea.	0.10
05/04/2022	KC	Download Resorts World's Ownership and Encumbrance Reports from title	0.30

		company links for 425 NE 13 ST; process invoice; and organize folders.	
05/04/2022	PNM	Correspondence from and to belgium counsel re motion to employ and related hearing	0.20
05/04/2022	PNM	Reviewing ownership and encumbrance report for sixth parcel of real property owned by building improvements buyer	0.10
05/05/2022	PNM	Correspondence from netherlands bankruptcy trustee	0.10
05/05/2022	PNM	Correspondence from and to co-counsel re hearing on motion to employ astera	0.10
05/06/2022	KC	Receipt and review of Notice of Hearing on Motion to Employ Astrea and calendar.	0.10
05/06/2022	KC	Receipt and review of Corrected Notice of Hearing on Motion to Employ Astrea and update calendar.	0.10
05/06/2022	PNM	Correspondence from and to opposing counsel re sembcorp marine claim	0.10
05/06/2022	PNM	Reviewing amended notice of hearing on motion to employ astera	0.10
05/09/2022	MN	Research regarding claims of Dutch trustee and requests for access and documentation and communication with trustee re same	1.20
05/09/2022	PNM	Correspondence from and to assignor counsel re renewal of foreign crystal trademarks	0.10
05/09/2022	PNM	Correspondence to client re [REDACTED]	0.10
05/09/2022	PNM	Correspondence from and to co-counsel re estate administrative matters and upcoming motions	0.10
05/09/2022	PNM	Correspondence from and to co-counsel re additional agenda items for upcoming status call	0.10
05/09/2022	PNM	Correspondence from and to counsel for Dalgic	0.10
05/09/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.70
05/10/2022	MN	Emails regarding Dutch trustee and requests for documents	0.10
05/10/2022	MN	Emails with client regarding [REDACTED]	0.20
05/10/2022	MN	Call with client regarding [REDACTED] [REDACTED]	0.60
05/10/2022	PNM	Correspondence from and to claimant Paolicelli re proof of claim	0.10
05/10/2022	PNM	Telephone conference with claimant cohen re proof of claim	0.10
05/10/2022	PNM	Correspondence to claimant cohen re proof of claim	0.10
05/12/2022	MN	Emails with counsel for Staboard regarding trust demand	0.10

05/12/2022	MRS	Review LA lease; draft Motion to Reject Lease	2.20
05/12/2022	PNM	Correspondence from and to co-counsel re hearing on motion to employ Astera	0.10
05/12/2022	PNM	Reviewing proof of claim from claimant novak	0.10
05/12/2022	PNM	Reviewing notice of appearance for counsel for oracle america	0.10
05/13/2022	KC	Email correspondence with co-counsel requesting Zoom instructions for Motion to Employ hearing.	0.10
05/13/2022	PNM	Telephone conference with client re [REDACTED]	0.10
05/13/2022	PNM	Preparing motion to reject california lease	0.90
05/13/2022	PNM	Correspondence from and to special counsel re california lease details in preparation of motion to reject lease	0.20
05/13/2022	PNM	Correspondece to client re [REDACTED]	0.10
05/13/2022	PNM	Reviewing answer and affirmative defenses to foresters complaint	0.10
05/16/2022	KC	Prepare Notice of Filing Astrea Fee Agreement; electronically file; prepare service email to Losey and court division; and correspondence with co-counsel.	0.30
05/16/2022	KC	Draft proposed order granting Motion to Employ Astrea.	0.40
05/16/2022	KC	Prepare cover letter; register attorney for CourtMap; and submit proposed order employing Astrea via court case management system.	0.30
05/16/2022	MN	Call with client regarding [REDACTED]	0.70
05/16/2022	KC	Receipt and review of signed Order Approving Employment of Astrea.	0.10
05/16/2022	MN	Call with client regarding [REDACTED]	0.70
05/16/2022	PNM	Preparing hearing and appearance at hearing on motion to employ astrea	0.80
05/16/2022	PNM	Correspondence to client re [REDACTED]	0.10
05/16/2022	PNM	Preparing order granting motion to employ astrea	0.10
05/16/2022	PNM	Correspondence to belgium counsel re order approving employment and next steps in matter	0.10
05/16/2022	PNM	Telephone conference with client re [REDACTED]	0.80
05/16/2022	PNM	Correspondence to co-counsel re status of florida maritime commission bond and impact on passenger claims	0.10
05/16/2022	PNM	Correspondece to client re [REDACTED]	0.10
05/16/2022	PNM	Initial preparation of motion to reject florida lease	0.10

05/17/2022	MRS	Draft Motion to Reject Miami Lease	1.20
05/17/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
05/18/2022	MN	Review motion to reject lease	0.20
05/18/2022	PNM	Correspondence from and to counsel for claimant cheah	0.10
05/18/2022	PNM	Telephone conference with agent re young proof of claim	0.10
05/18/2022	PNM	Correspondence to special counsel re california landlord position on motion to reject lease	0.20
05/18/2022	PNM	Correspondence from and to ca counsel re rejection of ca lease	0.10
05/18/2022	PNM	Preparing motion to reject florida lease	0.40
05/18/2022	PNM	Correspondence to co-counsel re service of order approving employment of astrea firm	0.10
05/18/2022	PNM	Correspondence to co-counsel re rejection of california and florida leases	0.10
05/19/2022	MN	Review and respond to emails regarding CA lease and sublease demand for deposit	0.10
05/20/2022	PNM	Reviewing ca lease issues re rejection of ca lease and related sublease	0.30
05/23/2022	MN	Review and respond to emails regarding Dutch trustee demands	0.10
05/23/2022	MRS	Review numerous emails and download pertinent information for later review.	0.90
05/23/2022	PNM	Reviewing proof of claim for customer yo	0.10
05/23/2022	PNM	Reviewing responses to forresters request for production	0.10
05/23/2022	PNM	Correspondence to client re [REDACTED]	0.10
05/23/2022	PNM	Correspondence from and to counsel for claimant cheah	0.10
05/23/2022	PNM	Reviewing and revising request for admissions to forresters	0.10
05/23/2022	PNM	Correspondence to co-counsel re discovery to foresters	0.10
05/23/2022	PNM	Reviewing matter re wright proof of claim	0.10
05/23/2022	PNM	Initial review and analysis of marsh insurance policy re claim for currency and goods upon vessels	0.40
05/23/2022	PNM	Telephone conference with client re [REDACTED]	0.80
05/23/2022	PNM	Reviewing comlux agreements re availability of claim to assignee	0.10
05/24/2022	MRS	Complete review of emails regarding Comlux	0.60
05/24/2022	MN	Emails regarding Bank of America statements for production to Starboard	0.10

05/24/2022	PNM	Review and analysis of proof of claim by durr	0.10
05/24/2022	PNM	Review and analysis of proof of claim by schwind	0.10
05/24/2022	PNM	Review and analysis of proof of claim by durr and seig	0.10
05/24/2022	PNM	Review and analysis of proof of claim by durr for schwind trip	0.10
05/24/2022	PNM	Preparing memo to client re [REDACTED]	0.10
05/24/2022	PNM	Correspondence from and to chea counsel re duplicate claim and consumer claim	0.20
05/25/2022	MN	Review bank statements for Bank of America account -8385 for production to Starboard	0.50
05/25/2022	PNM	Correspondence from and to counsel for chea re withdrawal of duplicate claim	0.10
05/26/2022	KC	Electronically file Motion for Order Authorizing Rejection of Unexpired Lease and prepare service email.	0.20
05/26/2022	PNM	Correspondence to belgium counsel re belgium claim	0.10
05/26/2022	PNM	Finalizing motion to reject CA lease	0.20
05/26/2022	PNM	Preparing motion to reject FL lease	0.40
05/26/2022	PNM	Telephone conference with client re [REDACTED]	0.10
05/26/2022	PNM	Reviewing motion to appear pro hac vice for counsel for pension benefit guaranty corporation	0.10
05/26/2022	PNM	Reviewing notice of appearance of donald kirk for ricky celorio	0.10
05/27/2022	PNM	Reviewing initial punitive damages research	0.10
05/27/2022	PNM	Reviewing proof of claim by claimaint vitto	0.10
05/27/2022	PNM	Correspondence from and to belgium counsel re status of court surveyor damages report	0.10
05/31/2022	PNM	Reviewing comfort order request from counsel for claimant breier	0.10
Quantity Subtotal			26.0
Services Subtotal			\$9,677.50

Expenses

Date	Description	Quantity	Rate	Total
05/04/2022	E124 Other: Fidelity National Title - Inv. no. 10397137 - O and E report for 425 NE 13 St.	1.00	\$300.00	\$300.00
Expenses Subtotal			\$300.00	

Time Keeper	Quantity	Rate	Total
Paul Mascia	12.8	\$425.00	\$5,440.00
Michael A. Nardella	5.0	\$450.00	\$2,250.00
Matthew Silbernagel	5.7	\$250.00	\$1,425.00
Karen Cooper	2.5	\$225.00	\$562.50
Quantity Total			26.0
Subtotal			\$9,977.50
Total			\$9,977.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21
9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
			Outstanding Balance	\$96,392.49
			Total Amount Outstanding	\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
				IOLTA Trust Account Balance	\$0.00	

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.



INVOICE

Invoice # 10462
Date: 07/07/2022

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
06/01/2022	PNM	Reviewing proof of claim from claimant wight	0.10
06/01/2022	PNM	Reviewing proof of claim from claimant rodriguez	0.10
06/01/2022	PNM	Reviewing proof of claim from claimant doral	0.10
06/02/2022	KC	Email correspondence with co-counsel regarding hearing availability for Motion to Reject Lease.	0.10
06/02/2022	KC	Review Notice of Hearing on Motion to Reject Lease and calendar.	0.10
06/02/2022	PNM	Correspondence to client re [REDACTED]	0.10
06/02/2022	PNM	Initial preparation for hearing on motion to reject ca lease	0.10
06/03/2022	PNM	Reviewng motion to withdraw in ny state lawsuit against the assignor initiated by plaintiff alevy	0.10
06/03/2022	PNM	Correspondence from and to counsel for claimant national arbitration and mediation and reviewing docket re proof of claim form for same	0.20
06/04/2022	PNM	Reviewing proof of claim for nyk cruises co	0.10
06/06/2022	KC	Prepare service email re: Notice of Hearing on Motion to Reject Lease to landlord.	0.10

06/06/2022	KC	Review New York case court docket; and draft Notice of ABC	0.50
06/06/2022	MN	Call with special counsel regarding status of arbitration lawsuit	0.20
06/06/2022	KC	Review NY Supreme Court e-filing registration requirements.	0.20
06/06/2022	KC	Email correspondence with New York counsel regarding filing suggestion of assignment	0.10
06/06/2022	MN	Prepare for and attend call with client regarding [REDACTED] [REDACTED] [REDACTED]	1.30
06/06/2022	PNM	Preparing suggestion of bankruptcy for alevy action against assignor in new york	0.20
06/06/2022	PNM	Correspondence from and to counsel for claimant national mediation arbitration	0.10
06/07/2022	PNM	Correspondence from and to arbitrator re alevy v. assignor suggestion of abc proceeding	0.10
06/08/2022	KC	Prepare letter to Robert mason regarding representation of assignee and unable to represent claimant.	0.30
06/08/2022	KC	Revise Notice of Assignment and emails re: same.	0.10
06/08/2022	KC	Pull authorities in support of Motion to Reject Lease prepare hearing folder; and upload authorities via court's case management system.	0.20
06/08/2022	PNM	Reviewing proof of claim for fdl event management	0.10
06/08/2022	PNM	Reviewing mason proof of claim	0.10
06/08/2022	PNM	Reviewing alevy proof of claim	0.10
06/08/2022	PNM	Correspondence from and to alevy counsel re alevy proof of claim	0.10
06/09/2022	PNM	Reviewing kfw ipex bank proof of claim	0.10
06/09/2022	PNM	Reviewing correspondence from rozance re rozance proof of claim	0.10
06/09/2022	PNM	Correspondence from and to arch insurance counsel	0.10
06/09/2022	PNM	Reviewing arch insurance counsel proof of claim	0.20
06/09/2022	PNM	Reviewing williams proof of claim	0.10
06/09/2022	PNM	Reviewing rheaume proof of claim	0.10
06/09/2022	PNM	Reviewing matter re block proof of claim	0.10
06/09/2022	PNM	Reviewing sisa proof of claim	0.10
06/09/2022	PNM	Reviewing Vijayeswaran proof of claim	0.10
06/10/2022	PNM	Reviewing oracle proof of claim	0.10
06/10/2022	PNM	Reviewing hellman worldwide proof of claim	0.10

06/10/2022	PNM	Reviewing cincinatti insurance proof of claim	0.10
06/10/2022	PNM	Reviewing credit agreements, lines of credit and ancillary documents re potential liability of assignor for malayan banking berhad	0.20
06/13/2022	MN	Review claims and issues related to claims objections	0.20
06/13/2022	MN	Call with client regarding [REDACTED]	0.40
06/13/2022	PNM	Reviewing credit agreements, lines of credit and ancillary documents re potential liability of assignor for malayan banking berhad	0.30
06/13/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.50
06/13/2022	PNM	Correspondence to belgium counsel re status of claim	0.10
06/14/2022	KC	Review New York case court docket to confirm Notice of ABC filed and retrieve copy of same.	0.10
06/14/2022	MN	Review and respond to emails regarding resolutions	0.10
06/14/2022	PNM	Reviewing notice of appearance for counsel for claimants	0.10
06/15/2022	KC	Draft proposed order on Motion to Reject Lease per judge's ruling.	0.50
06/15/2022	KC	Revise proposed order rejecting lease; prepare cover letter to judge; and submit via CourtMap.	0.30
06/15/2022	PNM	Preparing for and appearing at hearing on motion to reject ca lease	0.80
06/15/2022	PNM	Preparing order granting motion to reject ca lease	0.20
06/16/2022	MN	Call with co-counsel regarding Comlux claims	0.10
06/16/2022	PNM	Correspondence to belgium counsel re damages assessment from court surveyor	0.10
06/16/2022	PNM	Reviewing asset sale implications for potential receivable from comlux	0.10
06/16/2022	PNM	Correspondence from and to counsel for arch insurance	0.10
06/17/2022	KC	Receipt and review of order granting motion rejecting lease.	0.10
06/17/2022	KC	Prepare service email to Adam Losey and Eric Goldberg re: order granting motion rejecting lease.	0.10
06/17/2022	KC	Email correspondence to client regarding [REDACTED] [REDACTED]	0.10
06/17/2022	PNM	Reviewing notice of appearance for counsel for pension benefit guaranty corporation	0.10
06/17/2022	PNM	Reviewing order granting motion to reject ca lease	0.10
06/17/2022	PNM	Reviewing florin consumer proof of claim	0.10

06/17/2022	PNM	Telephone conference with arch insurance counsel re pending contingent claim and case status	0.30
06/20/2022	KC	Confirm Zoom instructions for 6/22/22 Case Management Conference.	0.10
06/20/2022	KC	Receipt and review of Order Cancelling 6/22/22 Case Management Conference and update calendar.	0.10
06/20/2022	PNM	Reviewing order canceling 6/22/22 interim case management conference	0.10
06/21/2022	PNM	Corrspondence from and to belgium re case status	0.10
06/21/2022	PNM	Telephone call from attorney dan mirewitz re consumer claim	0.10
06/21/2022	PNM	Telephone call from michael foley re consumer claim	0.10
06/22/2022	KC	Receipt and review of Notice of Hearing on Motion to Approval Sale of Assets and calendar.	0.10
06/22/2022	PNM	Reviewing notice of appearances of counsel for dehholm port services and related notice of proof of claim	0.10
06/22/2022	PNM	Reviewing motion to approve sale of assets, related purchase agreement, related order and notice of hearing	0.40
06/23/2022	KC	Prepare Notice of Filing Assignee's Affidavit of Service of Order Rejecting Lease	0.20
06/23/2022	KC	Electronically file Notice of Filing Affidavit of Service of Order Rejecting Lease.	0.10
06/23/2022	PNM	Preparing affidavit of service of order granting motion to reject ca lease	0.10
06/23/2022	PNM	Telephone conference with attorney mirewitz re personal injury claim	0.20
06/24/2022	PNM	Correpondence from and to d&o policy counsel	0.10
06/27/2022	KC	Set up conference call line and invite all attendees to case status conference.	0.20
06/27/2022	PNM	Corespondence from and to d&o counsel re next steps in matter	0.10
06/28/2022	PNM	Correspondence from and to alevy counsel re liability policy of assignor	0.10
06/28/2022	PNM	Correpondence to client re [REDACTED]	0.10
06/28/2022	PNM	Correspondnece to belgium counsel re maritime surveyor damages report	0.10
06/28/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.60
06/28/2022	PNM	Correspondence from and to ca counsel re reconciliation of amounts owed under ca lease	0.10
06/30/2022	PNM	Reviewing american express proof of claim	0.10
06/30/2022	PNM	Reviewing kaplan-stien proof of claim	0.10
06/30/2022	PNM	Reviewing brierer proof of claims	0.10

06/30/2022	PNM	Reviewing ca subtenant demand letter and sublease re evaluation of claim	0.10
06/30/2022	PNM	Correspondence from and to to co-counsel re ca subtenant claim	0.10
06/30/2022	PNM	Correspondence from and to ca counsel re ca lease reconciliation	0.10
Quantity Subtotal			15.1
Services Subtotal			\$5,735.00

Expenses

Date	Description	Quantity	Rate	Total
06/08/2022	E108 Postage: Mailing of letter to Robert Mason re conflict of interest.	1.00	\$0.53	\$0.53
Expenses Subtotal				\$0.53

Time Keeper	Quantity	Rate	Total
Paul Mascia	9.1	\$425.00	\$3,867.50
Michael A. Nardella	2.3	\$450.00	\$1,035.00
Karen Cooper	3.7	\$225.00	\$832.50
Quantity Total			15.1
Subtotal			\$5,735.53
Total			\$5,735.53

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21
9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53
Outstanding Balance				\$96,392.49
Total Amount Outstanding				\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
				IOLTA Trust Account Balance		\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.



INVOICE

Invoice # 10653
Date: 08/08/2022

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Date	Time Keeper	Description	Quantity
07/01/2022	PNM	Correspondence from and to ca counsel re ca lease claim	0.10
07/01/2022	PNM	Reviewing order granting motion to approve sale of assets	0.10
07/05/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
07/06/2022	KC	Receipt and review of Notice of Hearing on Motion to Approve Sale of Assets on Board and calendar.	0.10
07/06/2022	PNM	Reviewing motion to sell assets on crystal endeavor	0.10
07/06/2022	PNM	Reviewing notice of hearing on motion to sell assets aboard crystal endeavor	0.10
07/06/2022	PNM	Telephone conference with boa counsel re status of payment pursuant to court order and related maritime proceeding	0.10
07/07/2022	PNM	Correspondence from to boa counsel re assignor account in uk, payment to boa counsel per district court order and status of pending maritime matters	0.20
07/07/2022	PNM	Correspondence to maritime counsel re status of various maritime matters	0.10
07/07/2022	PNM	Correspondence from and to alevy counsel re assignory policy for liability insurance	0.10
07/07/2022	PNM	A104 Review/analyze L210 Pleadings: Reviewing matter status and next steps in estate administration	0.10
07/07/2022	PNM	Correspondence from and to belgium counsel re report of court surveyor in belgium litigation matter and reviewing report	0.20

07/07/2022	PNM	Correspondence to client re [REDACTED]	0.10
07/07/2022	PNM	Reviewing application of N.D. Tex. District Court maritime writ to accounts in foreign jurisdiction and correspondence to maritime counsel re same	0.20
07/07/2022	PNM	Correspondence from and to boa counsel re applicability of N.D. Tex. District Court maritime writ to foreign account	0.10
07/08/2022	MN	Deep review of potential claims held by assignor including claims related to transferred funds, parent mismanagement, and potential sales	1.90
07/08/2022	MN	Call regarding transfer of funds	1.00
07/08/2022	PNM	Reviewing matter re d&o claim and liability insurance policy claim	0.40
07/11/2022	KC	Review Ince engagement letter and draft Motion to Employ Ince as Gibraltar attorney.	0.70
07/11/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.80
07/11/2022	KC	Electronically file Motion to Employ Ince as Gibraltar Counsel.	0.10
07/11/2022	KC	Prepare service email to Adam Losey re: Motion to Employ Gibraltar Counsel.	0.10
07/11/2022	PNM	Telephone conference with client re [REDACTED]	0.30
07/11/2022	PNM	Telephone conference with client re [REDACTED]	0.80
07/11/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
07/11/2022	PNM	Telephone conference with client re [REDACTED]	0.80
07/11/2022	PNM	Correspondence to client re [REDACTED]	0.10
07/12/2022	KC	Confirm Zoom instructions for Motion to Approve Sale of Assets hearing.	0.10
07/12/2022	KC	Email correspondence with co-counsel regarding scheduling of Motion to Employ Ince as Gibraltar Counsel hearing.	0.10
07/12/2022	PNM	Correspondence to maritime counsel re applicability of writ to foreign account	0.10
07/12/2022	PNM	Reviewing matter re hearing on motion to sell estate assets	0.10
07/12/2022	PNM	Correspondence from and to boa counsel re assignor account balances	0.10
07/12/2022	PNM	Correspondence from and to falcon re client consumer claim	0.10
07/13/2022	KC	Receipt and review of Notice of Hearing on Motion to Employ Gibraltar Counsel; calendar; and email with co-counsel re: time discrepancy.	0.10
07/13/2022	KC	Receipt and review of Amended Notice of Hearing on Motion to Employ Gibraltar Counsel; and update calendar.	0.10

07/13/2022	PNM	Reviewing notice of hearing for motion to employ gibraltar counsel	0.10
07/13/2022	PNM	Correspondence from alevy counsel re withdrawal of assignor counsel in claim for personal injury	0.10
07/13/2022	PNM	Reviewing amended notice of hearing on motion to approve sale of assets aboard endeavor	0.10
07/14/2022	KC	Receipt and review of Order Granting Motion to Approve Sale of Assets on board the Endeavor.	0.10
07/14/2022	KC	Review correspondence from New York counsel regarding order of withdraw and confer with attorney.	0.10
07/14/2022	PNM	Reviewing correspondence for assignor counsel re withdrawl in alevy case after	0.10
07/14/2022	PNM	reviewing border granting motion to approve sale of assets on endeavor vessel	0.10
07/14/2022	PNM	Telephone conference with claimant bogner re status of consumer claim and related insurance and credit card refund considerations	0.30
07/15/2022	MN	Call regarding fee applications	0.10
07/15/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
07/15/2022	PNM	Reviewing order canceling interim status conference	0.10
07/15/2022	PNM	Correspondence to client re [REDACTED]	0.10
07/18/2022	KC	Receipt and review of Order Cancelling 7/20 Interim Case Management Conference and update calendar.	0.10
07/18/2022	PNM	Correspondence from and to tessmer counsel re status of tessmer claim	0.10
07/18/2022	PNM	Reviewing motion to clarify stay from breier counsel and related proposed order	0.10
07/18/2022	PNM	Correspondence from and to counsel for mulgund re related proof of claim	0.10
07/18/2022	PNM	Correspondence to ca counsel re status of lease claim and potential participation in refund of lc funds belonging to parent entity	0.10
07/18/2022	PNM	Telephone call to maritime counsel re status of pending matters and application of federal maritime writ to assignor uk account	0.20
07/18/2022	PNM	Preparing for and attending conference with client re [REDACTED] [REDACTED] [REDACTED]	0.90
07/19/2022	KC	Receipt and review of letter from employee I Mohammed Shafi Mulgund re: medical records.	0.10
07/20/2022	PNM	Correspondence from and to arch insurance counsel re claim issues	0.10
07/20/2022	PNM	Reviewing matter re fee application for belgium counsel	0.10
07/20/2022	PNM	Correspondence to client re [REDACTED]	0.10

07/21/2022	PNM	Correspondence from and to to arch insurance counsel re claim against estate	0.10
07/22/2022	MN	Emails with Bast Amron re Isle of Man counsel	0.20
07/22/2022	PNM	Telephone conference with arch insurance counsel re maritime bond, credit card refunds and related offsets in determining claims covered by arch and included in its proof of claim	0.40
07/22/2022	PNM	Reviewing matter re payment applications for phelps dunbar and astrea firms	0.10
07/25/2022	MN	Call regarding status of lease rejection	0.10
07/25/2022	MN	Review and respond to emails regarding lease claim and issues with same	0.20
07/25/2022	KC	Update draft Motion to Reject FL Lease.	0.10
07/25/2022	MN	Call regarding updates on rejection of contracts, claim filings, and upcoming hearing	0.70
07/25/2022	PNM	Correspondence from and to claimaint fernandez re human trafficking claim against assignor	0.20
07/25/2022	PNM	Corrspondence to co-counsel re former employee allegations of human trafficking	0.10
07/25/2022	PNM	Correspondence to client re [REDACTED]	0.10
07/25/2022	PNM	Preparing motion to reject florida lease	0.30
07/25/2022	PNM	Preparation for and telephone conference with client re [REDACTED]	0.70
07/26/2022	KC	Revise Motion to Reject FL Lease to include language re: notice of rejection.	0.10
07/26/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
Quantity Subtotal			16.6

Time Keeper	Quantity	Rate	Total
Paul Mascia	9.6	\$425.00	\$4,080.00
Michael A. Nardella	5.0	\$450.00	\$2,250.00
Karen Cooper	2.0	\$225.00	\$450.00
Quantity Total			16.6
Subtotal			\$6,780.00
Total			\$6,780.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
9678	03/12/2022	\$28,215.25	\$0.00	\$28,215.25
9828	04/11/2022	\$34,164.21	\$0.00	\$34,164.21
9992	05/09/2022	\$11,520.00	\$0.00	\$11,520.00
10355	06/15/2022	\$9,977.50	\$0.00	\$9,977.50
10462	07/07/2022	\$5,735.53	\$0.00	\$5,735.53

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10653	08/08/2022	\$6,780.00	\$0.00	\$6,780.00
Outstanding Balance				\$96,392.49
Total Amount Outstanding				\$96,392.49

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
IOLTA Trust Account Balance					\$0.00	

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment is due upon receipt.

EXHIBIT B
(Proposed Order)

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

In re:

COMPLEX BUSINESS LITIGATION
DIVISION

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

**ORDER GRANTING MOTION FOR APPROVAL AND
PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES
INCURRED BY NARDELLA & NARDELLA, PLLC, AS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD FEBRUARY 11, 2022 THROUGH JULY 31, 2022**

THIS CAUSE came before the Court without a hearing upon the *Motion for Approval and Payment of Fees and Reimbursement of Expenses Incurred by Nardella & Nardella, PLLC, as Counsel to the Assignee for the Period February 11, 2022 Through July 31, 2022* (the “Motion”), filed on negative notice by Mark C. Healy (the “Assignee”), solely in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC, Crystal Holdings U.S. LLC, and Crystal AirCruises LLC (collectively, the “Assignors”), pursuant to which Berger Singerman LLP seeks compensation in the amount of \$92,067.50 and reimbursement of expenses in the amount of \$4,324.99, for a total interim award of \$96,392.49, for the period of February 11, 2022 through July 31, 2022. The Court, having considered the Motion and the record in this proceeding, noting

that no objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

ORDERED that:

1. The Motion is **GRANTED**.
2. Nardella & Nardella, PLLC, as counsel to the Assignee, is awarded fees in the amount of \$92,067.50 and expenses in the amount of \$4,324.99, for a total award of \$96,392.49, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Nardella & Nardella, PLLC the sum of \$96,392.49.
4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered and expenses incurred by Nardella & Nardella, PLLC for the benefit of the assignment estate.

DONE AND ORDERED in Chambers, at Miami-Dade County, Florida on this ___ day of _____, 2022.

HONORABLE ALAN FINE
Circuit Court Judge

Copies furnished to:

Counsel of record