

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.

**MOTION FOR APPROVAL AND PAYMENT OF FEES INCURRED  
BY KENNEDYS CHUDLEIGH LTD. AS BERMUDA COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD OF MARCH 9, 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 or hearing unless a party in interest files an objection within 21 days from the date this paper is served. 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, Paul Steven Singerman, Esq. and Samuel Jason Capuano, Esq., Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, 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.

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 Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), and the Court’s *Order Granting Assignee’s Motion for Entry of an Order: (1) Approving Noticing Procedures, (2) Approving Proof of Claim Forms; and (3) Extending Deadline to Serve Notice of Assignment* (the “Notice Procedures Order”) entered on March 3, 2022, files this motion (the “Motion”) for approval and payment of interim fees in the amount of \$16,828.50 incurred by Kennedys Chudleigh Ltd. (“Kennedys”) in connection with its representation of the Assignee during the period of March 9, 2022 through July 31, 2022 (the “Application Period”). In support of the Motion, the Assignee 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 (collectively, the “Assignment Cases”). On March 3, 2022, the Court entered orders in each of the Assignment Cases consolidating and jointly administering the Assignment Cases for procedural purposes.

2. 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.

3. Pursuant to Florida Statute § 727.108(7), the Assignee retained Kennedys as Bermuda counsel to perform necessary legal services in connection with the pending related insolvency proceeding in Bermuda entitled *In the Matter of Genting Hong Kong Limited (Joint Personal Liquidators)*; Supreme Court of Bermuda, Civil Jurisdiction No. 11 of 2022 (the “Bermuda Proceedings”). Genting Hong Kong Limited is the indirect parent company of the Assignors.

4. On March 30, 2022, the Court entered an order approving the employment of Kennedys as Bermuda counsel to the Assignee.

5. During the Application Period, Kennedys provided counsel to the Assignee in connection with Bermuda insolvency law and practices, including obtaining access to the liquidation file in the Bermuda Proceedings and worked on making an application on behalf of the Assignee to the Bermuda Supreme Court for leave to inspect the file and for recognition of the Assignee as a foreign fiduciary, and prepared the required court documents for making the necessary applications in order to identify any potential assets of the assignment estates of the Assignors.

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

7. Kennedys, as Bermuda counsel to the Assignee, has incurred fees in the amount of \$16,828.50 for legal services provided to the Assignee during the Application Period as identified in the chart below. Kennedys’ invoices are attached hereto as **Exhibit “A”**. The summary of the fees and expenses incurred are as follows:

**SUMMARY OF FEES OF PROFESSIONALS**

<b>Partners/Associates &amp; Paraprofessionals</b>	<b>Hours</b>	<b>Rate/Hour</b>	<b>Total</b>
Erik Penz	27.30	\$525.00	\$14,332.50
Nicholas Miles	3.20	\$780.00	\$2,496.00
<b>TOTALS</b>	<b>30.50</b>		<b>\$16,828.50</b>

8. The Assignee respectfully requests that the Court approve this Motion and allow Kennedys an interim award of fees in the amount of \$16,828.50 for the period of March 9, 2022 through July 31, 2022.

9. There will be no prejudice to any party in respect of the requested interim award and distribution as it is being made for the purpose of administering, and for the benefit of, the Assignment Estate, and the fees sought to be paid by the Assignee 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 Assignee’s request for \$16,828.50 in compensation for services rendered by Kennedys, (iii) authorizing the Assignee to pay Kennedys \$16,828.50; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: August 19, 2022

BERGER SINGERMAN LLP  
*Co-Counsel for Assignee*  
1450 Brickell Avenue, Suite 1900  
Miami, FL 33131  
Telephone: (305) 755-9500  
Facsimile: (305) 714-4340

By: /s/ Samuel J. Capuano  
Paul Steven Singerman  
Florida Bar No. 378860  
[singerman@bergersingerman.com](mailto:singerman@bergersingerman.com)  
Samuel J. Capuano  
Florida Bar No. 90946  
[scapuano@bergersingerman.com](mailto:scapuano@bergersingerman.com)

**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](mailto:alosey@losey.law); via email to [cbl44@jud11.flcourts.org](mailto: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)**

# Kennedys

20 Brunswick Street  
Hamilton,  
HM 10 Bermuda  
T +1 441 296 9276  
F +1 441 296 9277  
www.kennedyslaw.com

Invoice Date : 09/05/2022

Invoice Number : 31-22-0000110/1/BMMAR108

Client Ref : GENTING/MARK HEALY/CRYSTAL

Our Ref : BMM114/1074578/NNM

MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE  
FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES  
LLC, ET AL.  
C/O BERGER SINGERMAN LLP  
1450 BRICKELL AVENUE, SUITE 1900  
MIAMI  
33131

For the Attention of : SAMUEL CAPUANO  
RE : IN THE MATTER OF GENTING HONG KONG LIMITED (JOINT PROVISIONAL LIQUIDATORS  
APPOINTED)(FOR RESTRUCTURING PURPOSES ONLY)  
Note : INTERIM ACCOUNT: 15/03/22 to 04/05/22

Item	Value of Services	USD
Professional Charges		14,892.00
	Total	14,892.00

Your Proportion = 100.00%

14,892.00

With Compliments

## Kennedys Chudleigh Ltd

### REMITTANCE SLIP

If paying by bank transfer please quote the Invoice Number below and remit to:-

Bank: HSBC Bermuda  
6 Front Street, Hamilton, HM11 Bermuda  
Account Name: Kennedys Chudleigh Ltd  
Account Number: If Paying in BDS: [REDACTED]  
If Paying in US\$: [REDACTED]

Swift Code: BBDABMHM

If paying by cheque please return the slip below with your remittance to Kennedys Chudleigh Ltd, P.O Box HM 2945, Hamilton HM-MX, Bermuda.

Our Ref : BMM114/1074578/NNM

Invoice No: 31-22-0000110/1/BMMAR108

Amount Payable USD 14,892.00

FROM: MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES LLC, ET AL.

FILE NUMBER: 1074578

# Kennedys

Invoice Number : 31-22-0000110/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Date: 09/05/2022

USD

Professional Charges

14,892.00

Total

14,892.00

## PROFESSIONAL CHARGES - TIMEKEEPER SUMMARY

Timekeeper	Time	Rate	Included Value	Write Off Value	Total Fees
ERIK PENZ	01:48	0.00	0.00	0.00	0.00
ERIK PENZ	24:48	525.00	13,020.00	0.00	13,020.00
NICHOLAS MILES	02:24	780.00	1,872.00	0.00	1,872.00
				Total	<u>14,892.00</u>

Although this invoice may include time value for attorneys and other fee-earners affiliated with Kennedys Chudleigh Ltd.'s associated law firms, including Kennedys Law LLP, such fee-earners are not employees or consultants of Kennedys Chudleigh Ltd. and are not practising Bermuda law unless admitted to the Bermuda Bar or registered as an associate under the Bermuda Bar Act 1974 and in compliance with all applicable Bermuda laws and regulations. Kennedys Chudleigh Ltd. is a limited liability company incorporated in Bermuda and approved and recognised under the Bermuda Bar (Professional Companies) Rules 2009. "Partner" is a title referring to a director or an employee of the company. A list of such persons can be obtained upon request. Associated with Kennedys Law LLP [www.kennedyslaw.com](http://www.kennedyslaw.com).



# Kennedys

Invoice Number : 31-22-0000110/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Time	Time Cost	Time Not Charged	Time Billed	Activity
NNM	15-Mar-22	00:24	312.00	0.00	312.00	TELEPHONE
EP3	24-Mar-22	00:30	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	24-Mar-22	00:36	315.00	0.00	315.00	REVIEWING FILE ANALYSE CONSIDER
NNM	24-Mar-22	00:48	623.99	0.00	623.99	REVIEWING FILE ANALYSE CONSIDER
EP3	25-Mar-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	28-Mar-22	00:18	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	29-Mar-22	00:06	52.50	0.00	52.50	EMAIL OUT
EP3	29-Mar-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	30-Mar-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	04-Apr-22	03:30	1,837.50	0.00	1,837.50	REVIEWING FILE ANALYSE CONSIDER
EP3	04-Apr-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	05-Apr-22	00:12	105.00	0.00	105.00	REVIEWING FILE ANALYSE CONSIDER
EP3	05-Apr-22	01:42	892.50	0.00	892.50	REVIEWING FILE ANALYSE CONSIDER
NNM	06-Apr-22	00:24	312.00	0.00	312.00	REVIEWING FILE ANALYSE CONSIDER
EP3	06-Apr-22	01:06	577.50	0.00	577.50	REVIEWING FILE ANALYSE CONSIDER
EP3	12-Apr-22	00:36	315.00	0.00	315.00	REVIEWING FILE ANALYSE CONSIDER
EP3	20-Apr-22	00:30	262.50	0.00	262.50	REVIEWING FILE ANALYSE CONSIDER
EP3	21-Apr-22	01:00	525.00	0.00	525.00	RESEARCH
EP3	22-Apr-22	00:06	52.50	0.00	52.50	RESEARCH
EP3	25-Apr-22	03:18	1,732.50	0.00	1,732.50	RESEARCH
EP3	26-Apr-22	04:48	2,520.00	0.00	2,520.00	DRAFTING
EP3	27-Apr-22	04:30	2,362.50	0.00	2,362.50	DRAFTING
EP3	28-Apr-22	00:18	157.50	0.00	157.50	DRAFTING
EP3	29-Apr-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	29-Apr-22	01:36	840.00	0.00	840.00	DRAFTING
NNM	29-Apr-22	00:48	623.99	0.00	623.99	DRAFTING
EP3	02-May-22	00:06	52.50	0.00	52.50	CONFERENCE
EP3	02-May-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	03-May-22	00:06	52.50	0.00	52.50	EMAIL OUT
EP3	03-May-22	00:12	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	04-May-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
EP3	04-May-22	00:06	52.50	0.00	52.50	EMAIL OUT
EP3	04-May-22	00:30	262.50	0.00	262.50	REVIEWING FILE ANALYSE CONSIDER
EP3	04-May-22	00:12	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)

ERIK PENZ	26:36	13,020.00	0.00	13,020.00
NICHOLAS MILES	02:24	1,872.00	0.00	1,872.00
<b>SUB TOTAL</b>	<b>29:00</b>	<b>14,892.00</b>	<b>0.00</b>	<b>14,892.00</b>

# Kennedys

Invoice Number : 31-22-0000110/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

## Billing Narrative

Timekeeper	Date	Notes/Activity	Time	Value
EP3	24-Mar-22	Attendance on preliminary admin and file opening.	00 Hours 30 Minutes	0.00
EP3	24-Mar-22	Emails from and to and telephone call to N. Miles re potential application to recognise client in Bermuda, interest in Genting HK Ltd winding-up, Companies Winding Up Rules, Florida proceedings, next steps.	00 Hours 36 Minutes	315.00
EP3	25-Mar-22	Continued attendance on file opening.	00 Hours 06 Minutes	0.00
EP3	28-Mar-22	Continued attendance on file opening.	00 Hours 18 Minutes	0.00
EP3	29-Mar-22	Emails from and to S. Capuano of Berger Singerman re Florida court documents and law proving the assignments to the client.	00 Hours 06 Minutes	52.50
EP3	29-Mar-22	Continued attendance on matter opening.	00 Hours 06 Minutes	0.00
EP3	30-Mar-22	Emails from and to S. Capuano re order approving retention of Kennedys Bermuda as entered this morning.	00 Hours 06 Minutes	52.50
EP3	04-Apr-22	Review Florida court documents and attachments and Florida statutory provisions received from S. Capuano. Consideration of bases for recognition and relief sought in Bermuda. Begin drafting an email to N. Miles re same.	03 Hours 30 Minutes	1,837.50
EP3	04-Apr-22	Continued attendance on file opening and time entries.	00 Hours 06 Minutes	0.00
EP3	05-Apr-22	Attendance on monitoring Civil and Commercial Court Schedule for Genting HK Ltd proceedings.	00 Hours 12 Minutes	105.00
EP3	05-Apr-22	Continued drafting of email to N. Miles re Florida court documents, attachments, and statutory provisions, bases for recognition and relief sought in Bermuda. Emails from and to N. Miles, and email to S. Capuano, re same. Attendance on law in support of recognition.	01 Hours 42 Minutes	892.50
EP3	06-Apr-22	Emails from and to S. Capuano re statutory basis in Florida for the client's assignment and background regarding client's cash and inventory on board the vessels. Teams call with S. Capuano re same. Receipt from N. Miles of precedent materials for recognition application.	01 Hours 06 Minutes	577.50
EP3	12-Apr-22	Emails from and to S. Capuano re client's attempts to speak with the JPLs, sale process, application for recognition. Telephone call to S. Capuano re same and next steps. Check Civil and Commercial Court Schedule for any hearings scheduled in Genting HK Ltd proceeding.	00 Hours 36 Minutes	315.00
EP3	20-Apr-22	Review evidence for application to recognise client in Bermuda and possible common-law bases for same. Telephone call to S. Capuano re same and next steps.	00 Hours 30 Minutes	262.50
EP3	21-Apr-22	Review of commentary materials and case-law authorities re common-law bases for recognition of foreign insolvency representatives in Bermuda.	01 Hours 00 Minutes	525.00
EP3	22-Apr-22	Continued attendance on common-law bases for recognition of foreign insolvency representatives in Bermuda.	00 Hours 06 Minutes	52.50

# Kennedys

Invoice Number : 31-22-0000110/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Notes/Activity	Time	Value
EP3	25-Apr-22	Continued review of commentary materials and case-law authorities re common-law bases for recognition of foreign insolvency representatives in Bermuda. Emails from and to S. Capuano re no response from Genting JPLs, next steps in respect of recognition application, Teams call tomorrow morning to discuss same.	03 Hours 18 Minutes	1,732.50
EP3	26-Apr-22	Teams call with S. Capuano re current status of communications with Genting HK JPLs, bring recognition application. Begin drafting ex parte summons and supporting affidavit for recognition. Emails from and to S. Capuano re evidence for same.	04 Hours 48 Minutes	2,520.00
EP3	27-Apr-22	Continued review of evidence and drafting of supporting affidavit for recognition application.	04 Hours 30 Minutes	2,362.50
EP3	28-Apr-22	Continued attendance on draft recognition application materials, and discussion with N. Miles re same.	00 Hours 18 Minutes	157.50
EP3	29-Apr-22	Emails from and to N. Miles re time entries, invoicing and progress of work product.	00 Hours 06 Minutes	0.00
EP3	29-Apr-22	Discussions with N. Miles re review of recognition application draft materials. Further revisions to same. Discussion with N. Miles re content of draft affidavit, nature of the client's statutory authority and such not being sanctioned/ordered by Florida court. Email to N. Miles enclosing draft materials. Emails with S. Capuano re same. Email from N. Miles re revised draft ex parte originating summons.	01 Hours 36 Minutes	840.00
EP3	02-May-22	Discussions with N. Miles re draft application materials, next steps in respect of same.	00 Hours 06 Minutes	52.50
EP3	02-May-22	Attendance on time entries for 30 April 2022 year end.	00 Hours 06 Minutes	0.00
EP3	03-May-22	Emails to and from N. Miles re draft recognition application materials, next steps in respect of same.	00 Hours 06 Minutes	52.50
EP3	03-May-22	Continued attendance on time entries for 30 April 2022 year end.	00 Hours 12 Minutes	0.00
EP3	04-May-22	Attendance on 2 - 3 May time entries.	00 Hours 06 Minutes	0.00
EP3	04-May-22	Emails from and to S. Capuano re draft recognition applications materials, and email to N. Miles re same.	00 Hours 06 Minutes	52.50
EP3	04-May-22	Review and consider N. Miles' revisions to the draft Ex Parte Summons. Consideration of relief sought as drafted and revised, and email to N. Miles re same. Email to N. Miles re draft supporting affidavit.	00 Hours 30 Minutes	262.50
EP3	04-May-22	Further attendance on time entries for 30 April 2022 year end.	00 Hours 12 Minutes	0.00
		<b>Total Time for Fee Earner - EP3</b>	<b>26 Hours 36 Minutes</b>	<b>13,020.00</b>
NNM	15-Mar-22	initial call with Sam Capuano	00 Hours 24 Minutes	312.00
NNM	24-Mar-22	Discuss court applications needed with E Penz, consider grounds for recognition application, email client with update	00 Hours 48 Minutes	624.00

# Kennedys

Invoice Number : 31-22-0000110/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Notes/Activity	Time	Value
NNM	06-Apr-22	Discuss with E Penz recognition application, searching file, asserting rights to documents, and outcome of E Penz call with client	00 Hours 24 Minutes	312.00
NNM	29-Apr-22	Amending ex parte summons; discuss with E Penz	00 Hours 48 Minutes	624.00
		<b>Total Time for Fee Earner - NNM</b>	<b>02 Hours 24 Minutes</b>	<b>1,872.00</b>

# Kennedys

20 Brunswick Street  
Hamilton,  
HM 10 Bermuda  
T +1 441 296 9276  
F +1 441 296 9277  
www.kennedyslaw.com

Invoice Date : 14/06/2022

Invoice Number : 31-22-0000184/1/BMMAR108

Client Ref : GENTING/MARK HEALY/CRYSTAL

Our Ref : BMM114/1074578/NNM

MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE  
FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES  
LLC, ET AL.

C/O BERGER SINGERMAN LLP  
1450 BRICKELL AVENUE, SUITE 1900  
MIAMI  
33131

For the Attention of : SAMUEL CAPUANO  
RE : IN THE MATTER OF GENTING HONG KONG LIMITED (JOINT PROVISIONAL LIQUIDATORS  
APPOINTED)(FOR RESTRUCTURING PURPOSES ONLY)  
Note : INTERIM ACCOUNT: 05/05/22 to 26/05/22

Item	Value of Services	USD
Professional Charges		1,936.50
Total		1,936.50

Your Proportion = 100.00%

1,936.50

With Compliments

## Kennedys Chudleigh Ltd

### REMITTANCE SLIP

If paying by bank transfer please quote the Invoice Number below and remit to:-

Bank: HSBC Bermuda  
6 Front Street, Hamilton, HM11 Bermuda  
Account Name: Kennedys Chudleigh Ltd  
Account Number: If Paying in BD\$: [REDACTED]  
If Paying in US\$: [REDACTED]

Swift Code: BBDABMHH

If paying by cheque please return the slip below with your remittance to Kennedys Chudleigh Ltd, P.O Box HM 2945, Hamilton HM-MX, Bermuda.

Our Ref : BMM114/1074578/NNM  
Invoice No: 31-22-0000184/1/BMMAR108

Amount Payable USD 1,936.50

FROM: MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES LLC, ET AL.

FILE NUMBER: 1074578

# Kennedys

Invoice Number : 31-22-0000184/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Date: 14/06/2022

USD

Professional Charges

1,936.50

Total

1,936.50

## PROFESSIONAL CHARGES - TIMEKEEPER SUMMARY

Timekeeper	Time	Rate	Included Value	Write Off Value	Total Fees
ERIK PENZ	00:24	0.00	0.00	0.00	0.00
ERIK PENZ	02:30	525.00	1,312.50	0.00	1,312.50
NICHOLAS MILES	00:48	780.00	624.00	0.00	624.00
				Total	<u>1,936.50</u>

Although this invoice may include time value for attorneys and other fee-earners affiliated with Kennedys Chudleigh Ltd.'s associated law firms, including Kennedys Law LLP, such fee-earners are not employees or consultants of Kennedys Chudleigh Ltd. and are not practising Bermuda law unless admitted to the Bermuda Bar or registered as an associate under the Bermuda Bar Act 1974 and in compliance with all applicable Bermuda laws and regulations. Kennedys Chudleigh Ltd. is a limited liability company incorporated in Bermuda and approved and recognised under the Bermuda Bar (Professional Companies) Rules 2009. "Partner" is a title referring to a director or an employee of the company. A list of such persons can be obtained upon request. Associated with Kennedys Law LLP [www.kennedyslaw.com](http://www.kennedyslaw.com).

# Kennedys

Invoice Number : 31-22-0000184/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Time	Time Cost	Time Not Charged	Time Billed	Activity
NNM	05-May-22	00:18	234.00	0.00	234.00	REVIEWING FILE ANALYSE CONSIDER
EP3	05-May-22	00:06	52.50	0.00	52.50	EMAIL OUT
EP3	05-May-22	00:48	420.00	0.00	420.00	DRAFTING
EP3	05-May-22	00:30	262.50	0.00	262.50	RESEARCH
EP3	05-May-22	00:18	157.50	0.00	157.50	RESEARCH
EP3	06-May-22	00:30	262.50	0.00	262.50	REVIEWING FILE ANALYSE CONSIDER
EP3	09-May-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	09-May-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)
NNM	09-May-22	00:18	234.00	0.00	234.00	RESEARCH
EP3	10-May-22	00:12	105.00	0.00	105.00	CONFERENCE
EP3	16-May-22	00:06	0.00	0.00	0.00	NON CHARGEABLE RESEARCH
EP3	17-May-22	00:06	0.00	0.00	0.00	NON CHARGEABLE RESEARCH
NNM	19-May-22	00:12	156.00	0.00	156.00	DRAFTING
EP3	26-May-22	00:06	0.00	0.00	0.00	MATTER ADMINISTRATION (NO CHARGE)

ERIK PENZ	02:54	1,312.50	0.00	1,312.50
NICHOLAS MILES	00:48	624.00	0.00	624.00

<b>SUB TOTAL</b>	<b>03:42</b>	<b>1,936.50</b>	<b>0.00</b>	<b>1,936.50</b>
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# Kennedys

Invoice Number : 31-22-0000184/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

## Billing Narrative

Timekeeper	Date	Notes/Activity	Time	Value
EP3	05-May-22	Follow-up with N. Miles re draft affidavit, next steps in respect of same. Discussion with N. Miles re same and re revised draft summons.	00 Hours 06 Minutes	52.50
EP3	05-May-22	Discussions with N. Miles re draft affidavit and revised draft summons. Telephone call to S. Capuano re same. Additional notes to draft affidavit re evidence regarding belief in inventory and cash on board, duty of full and frank disclosure. Email to S. Capuano re same. Email to N. Miles re revised draft summons.	00 Hours 48 Minutes	420.00
EP3	05-May-22	Attendance on relief, statutory basis and tests for obtaining such once recognition is obtained on which client would need to rely in order to obtain recognition in Bermuda.	00 Hours 30 Minutes	262.50
EP3	05-May-22	Begin attendance on jurisprudential basis for seeking disclosure from Genting JPLs.	00 Hours 18 Minutes	157.50
EP3	06-May-22	Continued attendance on relief, statutory basis and tests for obtaining such once recognition is obtained on which client would need to rely in order to obtain recognition in Bermuda. Continued attendance on jurisprudential basis for seeking disclosure from Genting JPLs.	00 Hours 30 Minutes	262.50
EP3	09-May-22	Continued attendance on jurisprudential basis for seeking disclosure from Genting JPLs. Continued attendance on relief, statutory basis and tests for obtaining such once recognition is obtained on which client would need to rely in order to obtain recognition in Bermuda.	00 Hours 06 Minutes	52.50
EP3	09-May-22	Attendance on time entries.	00 Hours 06 Minutes	0.00
EP3	10-May-22	Discussion with and email to N. Miles re draft materials and evidence for recognition application.	00 Hours 12 Minutes	105.00
EP3	16-May-22	Discussion with X. Rogers re status of research.	00 Hours 06 Minutes	0.00
EP3	17-May-22	Further discussion with X. Rogers re status of research.	00 Hours 06 Minutes	0.00
EP3	26-May-22	Continued attendance on time entries.	00 Hours 06 Minutes	0.00
		<b>Total Time for Fee Earner - EP3</b>	<b>02 Hours 54 Minutes</b>	<b>1,312.50</b>
NNM	05-May-22	Review draft supporting Healy affidavit and discuss with E Penz	00 Hours 18 Minutes	234.00
NNM	09-May-22	Short research on authorities on production of documents, email results to team, discuss research needs with Y-X Rogers	00 Hours 18 Minutes	234.00
NNM	19-May-22	Amending summons	00 Hours 12 Minutes	156.00
		<b>Total Time for Fee Earner - NNM</b>	<b>00 Hours 48 Minutes</b>	<b>624.00</b>



**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 INCURRED BY KENNEDYS CHUDLEIGH LTD. AS BERMUDA COUNSEL  
TO THE ASSIGNEE FOR THE PERIOD MARCH 9, 2022 THROUGH JULY 31, 2022**

**THIS CAUSE** came before the Court upon the *Motion for Approval and Payment of Fees Incurred by Kennedys Chudleigh Ltd. as Bermuda Counsel to the Assignee for the Period March 9, 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 Kennedys Chudleigh Ltd. seeks compensation in the amount of \$16,828.50 for the period of March 9, 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. Kennedys Chudleigh Ltd., as Bermuda counsel to the Assignee, is awarded fees in the amount of \$16,828.50, which represents 100% of the fees requested in the Motion.
3. The Assignee is authorized to pay to Kennedys Chudleigh Ltd. the sum of \$16,828.50.
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 Kennedys Chudleigh Ltd. for the benefit of the assignment estate.

**DONE AND ORDERED** in Chambers, at Miami-Dade County, Florida on this \_\_\_\_ day of \_\_\_\_\_, 2022.

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HONORABLE ALAN FINE  
Circuit Court Judge

Copies furnished to:

Counsel of record