

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 AND REIMBURSEMENT OF
EXPENSES INCURRED BY LOSEY PLLC AS SPECIAL 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 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 \$35,207.00 incurred by Losey PLLC (“LPLLC”) in connection with its representation of the Assignee during the period of February 11, 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 LPLLC as special counsel to perform necessary legal services pertaining to security and privacy issues, compliance issues and the sale of certain assets to maximize their value to the Assignment Estates.

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

5. During the Application Period, LPLLC successfully negotiated an agreement with CSHV Wilshire Landmark, LLC, the landlord to that certain Standard Form Office Lease dated May 28, 2013, which leased to the Crystal Cruises, LLC the premises located at 1175 Wilshire Boulevard, Los Angeles, California, regarding the potential return of funds. This agreement may result in a substantial recovery to the Assignment Estates. LPLLC has also continued to litigate a case entitled *Mark C. Healy, as Assignee for Crystal Aircruises, LLC v. Marana Aerospace Solutions, Inc., et al.* pending in the United States District Court, District of Arizona, Case No. 4:21-cv-00520-JAS, that may result in a substantial recovery of funds to the Assignment Estates.

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

7. LPLLC, as special counsel to the Assignee, has incurred fees in the amount of \$35,207.00 for legal services provided to the Assignee during the Application Period as identified in the chart below. LPLLC’s invoices are 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
Adam Losey (Partner)	32.10	\$545.00	\$17,494.50
Lexie Dantes (Associate)	47.30	\$325.00	\$15,372.50
Bunyaka Nardella (paralegal)	1.20	\$150.00	\$180.00
Claire Beemer (paralegal)	3.00	\$150.00	\$450.00

Partners/Associates & Paraprofessionals	Hours	Rate	Total
Grayson Lanza (paralegal)	.70	\$150.00	\$105.00
John Tuley	10.90	\$150.00	\$1,635.00
TOTALS	95.20		\$35,207.00

8. The Assignee respectfully requests that the Court approve this Motion and allow Phelps an interim award of fees in the amount of \$35,207.00 for the period of February 11, 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 \$35,207.00 in compensation for services rendered by LPLLC, (iii) authorizing the Assignee to pay LPLLC \$35,207.00; 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
Samuel J. Capuano
Florida Bar No. 90946
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; 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)



INVOICE FOR LEGAL SERVICES

Invoice # 11541308991

Date: 04/04/2022

Due On: 05/04/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Discount	Total
Service	AL	02/18/2022	Review Motion to Compel Arbitration and communications regarding same and extensions of time regarding same.	0.50	\$545.00	-	\$272.50
Service	AL	02/20/2022	Communications with opposing counsel and assignees counsel regarding claim and next steps regarding same.	0.50	\$545.00	-	\$272.50
Service	LD	02/20/2022	Review email chain with opposing counsel and prepare unopposed motion for extension of time to respond to defendants' motion to dismiss and memorandum of law as well as proposed summons.	3.10	\$325.00	-	\$1,007.50
Service	AL	02/21/2022	Communications regarding ABC and client information regarding same, as well as preparing and directing filing of motion and next steps regarding same.	0.70	\$545.00	-	\$381.50
Service	LD	02/21/2022	Finalize motion for extension of time and proposed order.	0.70	\$325.00	-	\$227.50
Service	LD	02/21/2022	Review district court of AZ rules for filing a motion for extension of time and submitting proposed orders. Correspond with A. Losey and paralegals regarding the same.	1.20	\$325.00	-	\$390.00
Service	BN	02/22/2022	Finalize and electronically file Plaintiff's Unopposed Motion for	0.50	\$150.00	-	\$75.00

Extension of Time to Respond to Defendants' Motion to Dismiss and Proposed Order with the Court; electronically serve the motion and proposed order with the Judge's chamber pursuant to the Court's Administrative Policies and Procedures.

Service	GL	02/22/2022	Updated docket with 15. Order Granting Motion for Extension, updated calendar deadlines	0.20	\$150.00	-	\$30.00
Service	AL	03/22/2022	Communications with client representative as well as opposing counsel in Phoenix regarding matter, potential resolution, and next steps regarding same.	0.50	\$545.00	-	\$272.50
Service	BN	03/22/2022	Finalize and electronically file Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss Plaintiff's Complaint and proposed order with the court; send the motion and proposed order to the Judge per the Judge's procedure; correspondence with L. Dantes regarding same.	0.50	\$150.00	-	\$75.00
Service	LD	03/22/2022	Prepare unopposed motion for extension of time and send to opposing counsel for review.	1.60	\$325.00	-	\$520.00
Service	LD	03/22/2022	Finalize unopposed motion for extension of time and send to B. Nardella for filing	0.40	\$325.00	-	\$130.00
Service	BN	03/24/2022	Review Order on Plaintiff's Motion for Extension of Time to Respond to Defendants' Motion to Dismiss; calendar deadline and save the file in the firm's internal drive accordingly.	0.10	\$150.00	100.0% (-\$15.00)	\$0.00
Service	AL	03/31/2022	Multiple communications regarding matter and potential settlement regarding same.	0.30	\$545.00	-	\$163.50

Quantity Subtotal 10.8

Line Item Discount Subtotal -\$15.00

Time Keeper	Position	Quantity	Rate	Discount	Total
Lexie Dantes	Associate	7.0	\$325.00	-	\$2,275.00

Adam Losey	Partner	2.5	\$545.00	-	\$1,362.50
Grayson Lanza	Paralegal	0.2	\$150.00	-	\$30.00
Bunyaka Nardella	Paralegal	1.1	\$150.00	-\$15.00	\$150.00
				Quantity Total	10.8
				Subtotal	\$3,817.50
				Total	\$3,817.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308963	05/05/2022	\$5,177.50	\$0.00	\$5,177.50
11541309197	06/04/2022	\$17,428.00	\$0.00	\$17,428.00
11541309509	07/06/2022	\$4,860.00	\$0.00	\$4,860.00
11541309794	08/04/2022	\$3,324.50	\$0.00	\$3,324.50
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due	
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50	
				Outstanding Balance	\$35,207.00
				Total Amount Outstanding	\$35,207.00

Please make all amounts payable to: Losey PLLC

Remittance Advice

Checking Information

Remit checks to: Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804

Wire Transfer Information

J.P. Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.
2424 Edgewater Drive
Orlando, FL 32804

Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

You agree that the actual cost of credit card processing, currently 2.8%, for any funds paid to Losey PLLC with a credit card will be paid by you as an additional cost; costs will be included on invoices and subject to the terms and conditions of the engagement agreement.



INVOICE FOR LEGAL SERVICES

Invoice # 11541308963

Date: 04/05/2022

Due On: 05/05/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	03/02/2022	Review statute and petition, as well as lease and other documentation, and at Assignee direction communications with opposing counsel at DLA Piper regarding same and prepare and send written report to Assignee regarding same.	1.50	\$545.00	\$817.50
Service	AL	03/03/2022	Review lease provisions and communications with client regarding same and strategy on draw down per client request.	1.00	\$545.00	\$545.00
Service	AL	03/07/2022	Review and analysis of lease and LOC obligations and communications with assignee regarding same and next steps on matter.	0.50	\$545.00	\$272.50
Service	AL	03/10/2022	Review notice of default and other documentation as well as communications with client regarding matter and next steps on same.	0.50	\$545.00	\$272.50
Service	AL	03/24/2022	Review all documentation and communications regarding California lease and next steps regarding same, as well as communications with client and co-counsel and drafting proposed response correspondence.	2.80	\$545.00	\$1,526.00
Service	AL	03/25/2022	Communications with various parties, videoconference with Hong Kong, and next steps regarding same.	1.20	\$545.00	\$654.00
Service	AL	03/26/2022	Review DLA Piper correspondence and correspondence with Hong Kong counsel per request on matter and next steps on same.	0.50	\$545.00	\$272.50
Service	AL	03/27/2022	Multiple communications with DLA piper, co-counsel, and Hong Kong counsel regarding	1.20	\$545.00	\$654.00

drawdown request and next steps associated with same and voluntary reduction on partial drawdown.

Service	AL	03/31/2022	Communications regarding lease status, drawdown, DLA Piper required accounting submission, and update to counsel.	0.30	\$545.00	\$163.50
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Quantity Subtotal 9.5

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	9.5	\$545.00	\$5,177.50

Quantity Total 9.5

Subtotal \$5,177.50

Total \$5,177.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50
11541309197	06/04/2022	\$17,428.00	\$0.00	\$17,428.00
11541309509	07/06/2022	\$4,860.00	\$0.00	\$4,860.00
11541309794	08/04/2022	\$3,324.50	\$0.00	\$3,324.50
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308963	05/05/2022	\$5,177.50	\$0.00	\$5,177.50
Outstanding Balance				\$35,207.00
Total Amount Outstanding				\$35,207.00

Please make all amounts payable to: Losey PLLC

Remittance Advice

Checking Information

Remit checks to: Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804

Wire Transfer Information

J.P. Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.
2424 Edgewater Drive
Orlando, FL 32804

Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

You agree that the actual cost of credit card processing, currently 2.8%, for any funds paid to Losey PLLC with a credit card will be paid by you as an additional cost; costs will be included on invoices and subject to the terms and conditions of the engagement agreement.



INVOICE FOR LEGAL SERVICES

Invoice # 11541309197

Date: 05/05/2022

Due On: 06/04/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	04/04/2022	Communications with client and opposing counsel regarding matter and next steps regarding same.	0.20	\$545.00	\$109.00
Service	AL	04/06/2022	Communications regarding matter and next steps regarding same.	0.20	\$545.00	\$109.00
Service	AL	04/07/2022	Communications with client; multiple communications with opposing counsel as well as Hong Kong liquidators; review and calculations regarding lease amounts as well as review of documents in question.	0.70	\$545.00	\$381.50
Service	AL	04/08/2022	Videoconference with Hong Kong parties regarding overdraw by landlord and communications regarding same as well as next steps on matters.	1.00	\$545.00	\$545.00
Service	AL	04/12/2022	Multiple communications regarding lease and inspection, as well as accounting and next steps on matter.	0.30	\$545.00	\$163.50
Service	AL	04/19/2022	Communications draft with additional parties and review documentation and communications from opposing counsel on matter and next steps on same.	0.50	\$545.00	\$272.50
Service	AL	04/20/2022	Communications with client representative and counsel for third party regarding recovery apportionment and next steps on same with landlord.	0.30	\$545.00	\$163.50
Service	AL	04/22/2022	Review lease rejection rubric and damages analysis as well as communications regarding same and	0.50	\$545.00	\$272.50

			next steps on matter.			
Service	AL	04/25/2022	Communications with client and opposing counsel regarding matter and next steps on same.	0.20	\$545.00	\$109.00
Service	AL	04/26/2022	Communications regarding matter and next steps regarding same.	0.50	\$545.00	\$272.50
Quantity Subtotal						4.4

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	4.4	\$545.00	\$2,398.00
Subtotal				\$2,398.00

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Discount	Total
Service	BN	02/09/2022	Review Defendants' Motion to Dismiss Plaintiffs' Complaint and Alternatively, To Compel Arbitration; calendar deadline and save the file in the firm's internal drive accordingly.	0.10	\$150.00	100.0% (-\$15.00)	\$0.00
Service	AL	04/06/2022	Communications with opposing counsel regarding settlement correspondence, substitution of party plaintiff, as well as additional matters and next steps regarding same.	0.30	\$545.00	-	\$163.50
Service	LD	04/07/2022	Research case law on FRCP 25 and assignment for benefit of creditors. Prepare motion for substitution and memorandum of law.	1.40	\$325.00	-	\$455.00
Service	LD	04/08/2022	Review Chapter 727 of Florida Statutes. Review Arizona local rules and Federal Rules for substitution procedure. Complete motion for substitution and memorandum of law.	2.00	\$325.00	-	\$650.00
Service	AL	04/12/2022	Review and revise proposed filings on substitution and communications regarding same and revisions to proposed order.	0.30	\$545.00	-	\$163.50
Service	LD	04/12/2022	Correspond with opposing counsel	0.10	\$325.00	-	\$32.50

re motion to substitute							
Service	LD	04/12/2022	Review motion to substitute and send to G. Lanza for filing	0.10	\$325.00	-	\$32.50
Service	LD	04/12/2022	Draft proposed order on motion to substitute and send to A. Losey for review	0.20	\$325.00	-	\$65.00
Service	AL	04/13/2022	Review and approve motion and revise proposed order for submissions on substitution, and analysis of response to motion to compel.	0.50	\$545.00	-	\$272.50
Service	LD	04/15/2022	Review defendants' motion to dismiss and compel arbitration and supporting memorandum of law. Begin researching case law to respond to defendants' arguments and draft response in opposition to motion to dismiss.	3.00	\$325.00	-	\$975.00
Service	AL	04/17/2022	Review Order and deficiency notice and communications with Assignee counsel regarding same.	0.20	\$545.00	-	\$109.00
Service	LD	04/18/2022	Research dismissal of complaint for failing to plead diversity and the circumstances in which arbitration must be compelled. Draft response in opposition to defendants' motion to dismiss and compel arbitration.	8.10	\$325.00	-	\$2,632.50
Service	LD	04/19/2022	Continue research on the situations in which arbitration must be compelled. Provide an analysis of the same and send to A. Losey for review.	2.90	\$325.00	-	\$942.50
Service	CB	04/21/2022	Research, specifically into Arizona case law, regarding potential arguments against having matter sent to arbitration. Correspondence with A. Dantes regarding the same. Correspondence with G. Lanza regarding additional research.	3.00	\$150.00	-	\$450.00
Service	GL	04/21/2022	Began researching cases that void mandatory arbitration contracts in MSA's	0.50	\$150.00	-	\$75.00
Service	LD	04/21/2022	Research issues in defendants' motion, pull case law, and prepare response to motion. Discuss the same with C. Beemer.	5.50	\$325.00	-	\$1,787.50
Service	LD	04/22/2022	Continue researching case law and	7.90	\$325.00	-	\$2,567.50

drafting response to defendants' motion							
Service	AL	04/23/2022	Review response to motion to dismiss and analysis of case law and arguments on same, as well as proposed revisions and additions to arguments.	0.50	\$545.00	-	\$272.50
Service	LD	04/23/2022	Review notes from A. Losey and research case law on the same. Revise response to defendants' motion.	1.60	\$325.00	-	\$520.00
Service	LD	04/24/2022	Continue revising response to defendants' motion	2.30	\$325.00	-	\$747.50
Service	AL	04/25/2022	Review and revise response to motion to compel arbitration and dismiss, as well as review and communications regarding case law and next steps regarding same.	1.20	\$545.00	-	\$654.00
Service	LD	04/25/2022	Complete response to defendants' motion, review the same, and send to C. Beemer for filing.	4.50	\$325.00	-	\$1,462.50
Quantity Subtotal							46.2
Line Item Discount Subtotal							-\$15.00

Time Keeper	Position	Quantity	Rate	Discount	Total
Lexie Dantes	Associate	39.6	\$325.00	-	\$12,870.00
Adam Losey	Partner	3.0	\$545.00	-	\$1,635.00
Claire Beemer	Paralegal	3.0	\$150.00	-	\$450.00
Grayson Lanza	Paralegal	0.5	\$150.00	-	\$75.00
Bunyaka Nardella	Paralegal	0.1	\$150.00	-\$15.00	\$0.00

Subtotal \$15,030.00

Quantity Total 50.6

Subtotal \$17,428.00

Total \$17,428.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50
11541308963	05/05/2022	\$5,177.50	\$0.00	\$5,177.50
11541309509	07/06/2022	\$4,860.00	\$0.00	\$4,860.00
11541309794	08/04/2022	\$3,324.50	\$0.00	\$3,324.50
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541309197	06/04/2022	\$17,428.00	\$0.00	\$17,428.00
Outstanding Balance				\$35,207.00
Total Amount Outstanding				\$35,207.00

Please make all amounts payable to: Losey PLLC

Remittance Advice

Checking Information

Remit checks to: Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804

Wire Transfer Information

J.P. Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.
2424 Edgewater Drive
Orlando, FL 32804

Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

You agree that the actual cost of credit card processing, currently 2.8%, for any funds paid to Losey PLLC with a credit card will be paid by you as an additional cost; costs will be included on invoices and subject to the terms and conditions of the engagement agreement.



INVOICE FOR LEGAL SERVICES

Invoice # 11541309509

Date: 06/06/2022

Due On: 07/06/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	05/02/2022	Communications regarding California lease and next steps regarding same.	0.30	\$545.00	\$163.50
Service	AL	05/04/2022	Review multiple issues and privacy matters and analysis and correspondence with client regarding various issues.	0.50	\$545.00	\$272.50
Service	AL	05/13/2022	Prepare for and conduct telephone conference with client and others per client request regarding multiple issues; review and correspondence on lease rejection issues.	2.20	\$545.00	\$1,199.00
Service	AL	05/18/2022	Communications regarding lease agreement, sublease, and abandonment, as well as multiple correspondence with opposing counsel and co-counsel regarding same and potential consent motion.	0.50	\$545.00	\$272.50
Service	JT	05/19/2022	Research and analysis of security deposit language and cross-reference associated with same on multiple agreements.	1.20	\$150.00	\$180.00
Service	JT	05/20/2022	Legal research and analysis on California legal issues and next steps regarding same.	0.60	\$150.00	\$90.00
Service	AL	05/20/2022	Review California lease, sublease, and California statutes and law to provide analysis associated with fund segregation and interplay between rejection and priority as well as other fund issues.	1.00	\$545.00	\$545.00
Quantity Subtotal						6.3

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	4.5	\$545.00	\$2,452.50
John Tuley	Law Clerk	1.8	\$150.00	\$270.00
			Subtotal	\$2,722.50

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	05/11/2022	Review Reply to Response to Motion to Compel Arbitration and communications regarding same.	0.50	\$545.00	\$272.50
				Quantity Subtotal		0.5

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.5	\$545.00	\$272.50
			Subtotal	\$272.50

01211-Healy

General matters.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	JT	05/25/2022	Research and analysis on information security and privacy issues per client request.	2.20	\$150.00	\$330.00
Service	AL	05/25/2022	Review privacy policies and additional information and communications with co-counsel regarding same as well as historical forensic privacy analysis.	0.50	\$545.00	\$272.50
Service	JT	05/26/2022	Research on GDPR question with Crystal Cruises to inform on privacy policy turnover requirements.	5.40	\$150.00	\$810.00
Service	LD	05/26/2022	Analysis of GDPR requirements regarding purchases of user data in the event of the sale of a business.	0.70	\$325.00	\$227.50
Service	JT	05/27/2022	Research and analysis on case law regarding user data sale per client query on same as well as Wayback analysis.	1.50	\$150.00	\$225.00

Quantity Subtotal 10.3

Time Keeper	Position	Quantity	Rate	Total
Lexie Dantes	Associate	0.7	\$325.00	\$227.50
Adam Losey	Partner	0.5	\$545.00	\$272.50
John Tuley	Law Clerk	9.1	\$150.00	\$1,365.00
Subtotal				\$1,865.00

Quantity Total 17.1

Subtotal \$4,860.00

Total \$4,860.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50
11541308963	05/05/2022	\$5,177.50	\$0.00	\$5,177.50
11541309197	06/04/2022	\$17,428.00	\$0.00	\$17,428.00
11541309794	08/04/2022	\$3,324.50	\$0.00	\$3,324.50
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541309509	07/06/2022	\$4,860.00	\$0.00	\$4,860.00
Outstanding Balance				\$35,207.00
Total Amount Outstanding				\$35,207.00

Please make all amounts payable to: Losey PLLC

Remittance Advice

Checking Information

Remit checks to: Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804

Wire Transfer Information

J.P. Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.
2424 Edgewater Drive
Orlando, FL 32804

Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

You agree that the actual cost of credit card processing, currently 2.8%, for any funds paid to Losey PLLC with a credit card will be paid by you as an additional cost; costs will be included on invoices and subject to the terms and conditions of the engagement agreement.



INVOICE FOR LEGAL SERVICES

Invoice # 11541309794

Date: 07/05/2022

Due On: 08/04/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	06/29/2022	Draft proposed proceeds agreement after review, as well as review of historical correspondence and other information regarding matter and next steps associated with the same and proposed emails to both opposing counsel for landlord and JPL regarding matter.	1.50	\$545.00	\$817.50
Quantity Subtotal						1.5

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	1.5	\$545.00	\$817.50
Subtotal				\$817.50

01211-Healy

General matters.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	06/01/2022	Review privacy policies and additional information associated with the same and quadrants on opt-in or opt-out, as well as next steps and recommendations associated with the same.	1.50	\$545.00	\$817.50
Service	AL	06/10/2022	Review Berger Singerman request on privacy issues and communications regarding same on three privacy points and request and modifications to	0.30	\$545.00	\$163.50

APA.						
Service	AL	06/13/2022	Review and correspondence regarding asset purchase agreement privacy provisions and communications regarding same.	1.00	\$545.00	\$545.00
Service	AL	06/15/2022	Review records per Assignee request and provision of same.	0.30	\$545.00	\$163.50
Service	AL	06/15/2022	Review privacy matters associated with sale of assets and communications regarding same and next steps on matter.	0.50	\$545.00	\$272.50
Service	AL	06/16/2022	Review multiple matters and communications and next steps on various asset purchase issues as well as next steps on same and negotiation of purchase agreement terms and privacy and intellectual property issues.	1.00	\$545.00	\$545.00
Quantity Subtotal						4.6

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	4.6	\$545.00	\$2,507.00
Subtotal				\$2,507.00
Quantity Total				6.1
Subtotal				\$3,324.50
Total				\$3,324.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50
11541308963	05/05/2022	\$5,177.50	\$0.00	\$5,177.50
11541309197	06/04/2022	\$17,428.00	\$0.00	\$17,428.00
11541309509	07/06/2022	\$4,860.00	\$0.00	\$4,860.00
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541309794	08/04/2022	\$3,324.50	\$0.00	\$3,324.50
			Outstanding Balance	\$35,207.00
			Total Amount Outstanding	\$35,207.00

Please make all amounts payable to: Losey PLLC

Remittance Advice

Checking Information

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Wire Transfer Information

J.P. Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.
2424 Edgewater Drive
Orlando, FL 32804

Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

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INVOICE FOR LEGAL SERVICES

Invoice # 11541310095

Date: 08/05/2022

Due On: 09/04/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	07/01/2022	Communications with client representation and opposing counsel for landlord and for liquidator regarding recovery of funds and split associated with the same.	0.20	\$545.00	\$109.00
Service	AL	07/18/2022	Communications with client regarding status and recovery of funds, as well as agreement on splitting same.	0.10	\$545.00	\$54.50
Service	AL	07/21/2022	Multiple communications with landlord as well as others regarding lease and status associated with the same.	0.30	\$545.00	\$163.50
Service	AL	07/28/2022	Review and communications on lease agreement and next steps regarding same as well as communications with client counsel regarding same; review and confirm lease agreement proceeds split and next steps regarding same.	0.50	\$545.00	\$272.50
Quantity Subtotal						1.1

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	1.1	\$545.00	\$599.50

Quantity Total 1.1

Subtotal \$599.50

Total \$599.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541308991	05/04/2022	\$3,817.50	\$0.00	\$3,817.50
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Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310095	09/04/2022	\$599.50	\$0.00	\$599.50
Outstanding Balance				\$35,207.00
Total Amount Outstanding				\$35,207.00

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Bank ABA/Routing #: 021000021 (for wire transfers only) / 267084131 (for ACH and direct deposit only)

Name/Account #: [REDACTED]

SWIFT: CHASUS33

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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 LOSEY PLLC AS SPECIAL 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 Losey PLLC as Special 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 Phelps Dunbar, LLP seeks compensation in the amount of \$35,207.00 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. Losey PLLC, as special counsel to the Assignee, is awarded fees in the amount of \$35,207.00, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Losey PLLC the sum of \$35,207.00, which is the balance owed after application of the retainer already paid by the Assignee to Losey PLLC.
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 Losey 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