

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 PHELPS DUNBAR, LLP 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 \$77,590.00 and reimbursement of expenses in the amount of \$780.85, for a total award of \$78,370.85 incurred by Phelps Dunbar, LLP (“Phelps”)<sup>1</sup> 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.

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<sup>1</sup> Phelps was paid a retainer of \$50,000.00 which was applied to the payment of its invoices. Accordingly, of the \$78,370.85 total requested compensation, after accounting for the \$50,000 retainer already applied, **the Assignee seeks authorization to pay an additional \$28,370.85 to Phelps.**

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 Phelps Dunbar as special counsel to perform necessary legal services pertaining to maritime law issues and claims.

4. On March 11, 2022, the Court entered an order approving the employment of Phelps as special counsel to the Assignee.

5. During the Application Period, Phelps coordinated responses to various legal actions concerning maritime law in Florida, Texas, the Bahamas, and Gibraltar. In Florida and Texas, Phelps defended the claims asserted against Crystal Cruises LLC by Peninsula Petroleum for allegedly unpaid fuel invoices, which included contested motion practice. At present, Phelps remains in active litigation and negotiations with counsel for Peninsula Petroleum in the Texas actions in an attempt to resolve those disputes and preserve a recovery to the assignment estate of Crystal Cruises, LLC (the “Assignment Estate”) from funds that had been seized. Phelps also assisted in the identification and instruction of counsel in the Bahamas and Gibraltar to protect various assets and cash owned by Crystal Cruises LLC located on board vessels that were arrested in those jurisdictions.

6. The Assignee successfully negotiated sales of assets of the Assignment Estate, including assets on board the arrested vessels located in the Bahamas and in Gibraltar, in part, due to the efforts of Phelps in protecting the Assignee’s and the Assignment Estate’s interests in those jurisdictions. The Court approved the referenced sales on July 1 and July 13, 2022.

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

8. Phelps, as special counsel to the Assignee, has incurred fees in the amount of \$77,590.00 for legal services provided to the Assignee during the Application Period as identified in the chart below, and expenses in the amount of \$780.85 in the nature of photocopy charges, filing fees, and other expenses. Phelps' 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>
Kent Morrison	36.40	\$400	\$14,560.00
Jason Pill	12.00	\$390	\$4,680.00
Jeremy Grabill	97.30	\$350	\$34,055.00
Rick Shelby	1.60	\$350	\$560.00
Marc Matthews	12.30	\$330	\$4,059.00
Arthur Kraatz	54.40	\$290	\$15,776.00
Carlos Saravia	7.60	\$275	\$2,090.00
Dawn A. Bebell	4.10	\$250	\$1,025.00
Chinki Safaya	0.30	\$180	\$54.00
Clara Clemson	4.30	\$170	\$731.00
<b>TOTALS</b>	<b>230.30</b>		<b>\$77,590.00</b>

**SUMMARY OF EXPENSES INCURRED**

<b>Type of Expense</b>	<b>Amount of Expense</b>
Reproductions/Photocopies	\$40.65
Court Reporter/Transcript Fees/Filing fees	\$740.00
Westlaw	\$0.20
<b>Total Expenses</b>	<b>\$780.85</b>

9. The Assignee respectfully requests that the Court approve this Motion and allow Phelps an interim award of fees in the amount of \$77,590.00 and reimbursement of expenses in the amount of \$780.85, for a total of \$78,370.85 for the period of February 11, 2022 through July 31, 2022.

10. Phelps was paid a retainer of \$50,000.00 which was applied to the payment of its invoices. Accordingly, of the \$78,370.85 total requested compensation, after accounting for the \$50,000 retainer already applied, **the Assignee seeks authorization to pay an additional \$28,370.85 to Phelps.**

11. 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 \$77,590.00 in compensation for services rendered by Phelps and reimbursement of expenses incurred by Phelps in the amount of \$780.85, for a total award of \$78,370.85, (iii) authorizing the Assignee to pay Phelps \$28,370.85; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: August 19, 2022

BERGER SINGERMAN LL  
*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)**



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

March 15, 2022  
**Invoice Number: 1234173**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated March 15, 2022:

Total Fees	\$	23,218.00
Total Disbursements		40.00
<b>Total Of Invoice</b>	<b>\$</b>	<b>23,258.00</b>
<b>Less Retainer Funds Applied</b>	<b>\$</b>	<b>-23,258.00</b>
<b>Total Of Invoice</b>	<b>\$</b>	<b>0.00</b>

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT





POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

March 15, 2022  
**Invoice Number: 1234173**

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For Professional Services Rendered Through February 28, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/14/22	K. Morrison	Receipt and review of emails, charter parties and related documentation concerning arrest and Rule B garnishment; Telephone conference with client regarding same; Analyzing potential remedies for wrongful arrest/garnishment/seizure	2.10	840.00
02/14/22	J. Pill	Teleconference with Mark Healy regarding the status of the assignment and additional information required from Phelps; exchange correspondence regarding same; brief review of assignment issues impacting Crystal Cruises and related advices; teleconference with Mark Healy to further address primary issues facing the company and next steps; strategic consideration to various admiralty and creditor issues; analyze various documents and materials provided by Mark Healy in advance of further discussions, including garnishment filings and key	3.00	1,170.00



Our File Number: 40342-0001  
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		transactional documents; further teleconference with Mark Healy to assess strategy going forward and next steps, focusing on freeing up certain bank accounts		
02/15/22	K. Morrison	Study and review of all background documentation relative to claim by mortgage lending bank	0.70	280.00
02/15/22	K. Morrison	Drafting email to counsel for mortgage lending bank	0.40	160.00
02/15/22	J. Grabill	Develop the litigation strategy	0.20	70.00
02/15/22	J. Grabill	Analyzed potential Ch. 15 or Ch. 7 bankruptcy petition and multiple communications with bankruptcy counsel re: same	0.40	140.00
02/15/22	J. Grabill	Began reviewing file materials forwarded by client, including relevant emails and pleadings, and continued analysis re: litigation strategy	1.20	420.00
02/15/22	C. Safaya	Organize and prepare records for attorney use and review.	0.30	54.00
02/15/22	R. Shelby	Research case regarding Assignment for the Benefit of Creditors in FL and application of automatic stay in connection with filing an AOB case; review bankruptcy records related to Crystal Cruises parent company and advise regarding filing of Chapter 15 case in US bankruptcy court to institute stay from Bermuda proceedings	1.00	350.00
02/16/22	K. Morrison	Telephone conference with counsel for Peninsula Petroleum; Receipt and review of correspondence re Freedom Fresh; Study and review of Freedom Fresh filings; Telephone conference with former GC for Crystal Cruise; Study and review of all Rule B Attachments and related documentation; Telephone conference with Mark	2.70	1,080.00



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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/16/22	J. Pill	Healey Receipt and review of various correspondence relating to pending actions and garnishments against Crystal Cruises in multiple jurisdictions; strategic considerations to responding to various claims and pending injunctive relief, including claims asserted by Freedom Fresh; analyze certain court filings against Crystal Cruises; prepare correspondence to Mark Healy regarding same and next steps	1.20	468.00
02/16/22	J. Grabill	Reviewed bankruptcy counsel's analysis re: impact of Florida statutes re: assignment for benefit of creditors and potential bankruptcy options, and call with him re: same	0.30	105.00
02/16/22	J. Grabill	Reviewed complaints filed in California, Texas, and Florida by Peninsula Petroleum and strategize re: responding to motions to vacate Rule B attachments	1.00	350.00
02/16/22	J. Grabill	Further litigation strategy and development based on competing actions; reviewed pleadings in Freedom Fresh case and analyzed strategy for TRO hearing	1.40	490.00
02/16/22	J. Grabill	Strategy re: assets remaining on vessels in Bahamas	0.30	105.00
02/16/22	J. Grabill	Legal research re: potential defenses / challenges to Rule B attachments in Texas and California	0.90	315.00
02/16/22	A. Kraatz	Review of file materials received from client and analysis regarding possible options for release of Rule B attachments	2.40	696.00
02/16/22	A. Kraatz	Multiple conferences with client and counsel for Peninsula Petroleum regarding Rule B	1.80	522.00



Our File Number: 40342-0001  
Invoice Number: 1234173

March 15, 2022  
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		attachments		
02/16/22	A. Kraatz	Drafting motion to vacate Rule B attachments	2.00	580.00
02/16/22	R. Shelby	Strategize re: research of assignment for the benefit of creditors in Florida and also prospects of initiating bankruptcy proceedings to institute automatic stay in US	0.60	210.00
02/17/22	K. Morrison	Receipt and review of documentation relative to underlying claims; Telephone conference with client related to various containers and handling of same; Preparing for hearing in Freedom Fresh matter; Attending hearing; Drafting court order re containers; Telephone conference with client; Receipt and review of order; Corresponding with client re same	3.30	1,320.00
02/17/22	J. Pill	Exchange correspondence with Mark Healy to discuss status of the matter; review updates related to the amounts owed to Freedom Fresh and freeing up those sums of money; evaluate the impact of same on the pending injunction and analysis of the status conference with the court; teleconference with Mark Healy regarding same and next steps; review the proposed injunctive order regarding Freedom Fresh; review correspondence to and from opposing counsel regarding additional amounts owed now that Freedom Fresh has been resolved	0.70	273.00
02/17/22	J. Grabill	Further strategy regarding the response to motions to vacate Rule B attachments; legal research re: general standards for Rule B attachments and Rule E post-attachment hearings and began drafting inserts for motions to	2.40	840.00



Our File Number: 40342-0001  
Invoice Number: 1234173

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		vacate		
02/17/22	J. Grabill	Reviewed documentation re: Peninsula's supply of bunkers and analyzed whether Peninsula has a maritime claim against Crystal Cruises	0.60	210.00
02/17/22	J. Grabill	Reviewed draft inserts re: equitable arguments for vacating Rule B attachments for motions to vacate and made revisions to same	0.40	140.00
02/17/22	A. Kraatz	Drafting motion to vacate Rule B attachments and correspondence with client regarding factual information needed to prepare same	4.30	1,247.00
02/17/22	C. Saravia	Analysis of Houston and Dallas Rule B attachments to obtain additional background information with which to draft Motion to Vacate inserts arguing for equitable vacatur	0.40	110.00
02/17/22	C. Saravia	Analysis of secondary sources, including Shoenbaum's, to obtain general understanding of principles of equitable vacatur and Fifth Circuit's status on adoption of Second Circuit's Aqua Stoli factors test	0.40	110.00
02/17/22	C. Saravia	Analysis of appellate-level jurisprudence, with focus on Fifth and Second Circuits, to obtain necessary case law to support Fifth Circuit's application of Aqua Stoli factors and to prepare arguments for vacating Rule B attachments	2.90	797.50
02/17/22	C. Saravia	Preparation of inserts for Memorandum in Support of Motion to Vacate Rule B Attachments, including status of equitable vacatur in Fifth Circuit, general principles of equitable vacatur, and preparation of arguments in favor of vacatur on the basis of alternate convenient forum and plaintiff's	1.20	330.00



Our File Number: 40342-0001  
Invoice Number: 1234173

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		oversecured status		
02/17/22	C. Saravia	Online research to obtain factual background regarding vessels arrested in The Bahamas as well as ship's particulars (tonnage, flag, value) to include in arguments supporting equitable vacatur	0.30	82.50
02/17/22	C. Saravia	Finalize inserts for Memorandum in Support of Motion to Vacate Rule B attachments	1.20	330.00
02/17/22	C. Clemson	Reviewing and organizing Peninsula Petroleum's sale & delivery documentation	1.80	306.00
02/18/22	K. Morrison	Edit and revise motion to vacate; Coordinating filing of same; Telephone conference with Jessica Hoppe and Mark Healey re motion to vacate; Corresponding with counsel for Peninsula Petroleum; Telephone conference with counsel for Bank of America; Receipt and review of correspondence from counsel for Freedom Fresh; Receipt and review of email from counsel for Bank of America	2.60	1,040.00
02/18/22	M. Matthews	Strategize with counsel regarding Motions to Vacate in SDTX and NDTX; review and revise SDTX Motion to Vacate; review presiding Judge Hanks's procedures; confer with counsel regarding the Certificate of Conference; draft proposed order; attention to filing same	2.20	726.00
02/18/22	J. Pill	Review correspondence to and from counsel for BANA regarding the recent Freedom Fresh ruling and lifting of the injunction; brief teleconference with counsel for BANA regarding same; review additional correspondence from BANA's counsel inquiring about the assignment and status of certain accounts	0.40	156.00



Our File Number: 40342-0001  
Invoice Number: 1234173

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/18/22	J. Grabill	Continuing analysis re: strategy for motions to vacate Rule B attachments; reviewed initial draft of motions to vacate and provided comments to same; reviewed and revised updated drafts of motions to vacate; attention to finalizing and filing of motions	3.20	1,120.00
02/18/22	A. Kraatz	Drafting motions to vacate Rule B attachments and associated pleadings for filing today	5.20	1,508.00
02/18/22	D. Bebell	Revise, finalize, and serve Defendants' Motion to Vacate Rule B Attachment in C.A. 4:22-CV-00337, U.S. District Court, Southern District of Texas; revise, finalize, and serve Defendants' Motion to Vacate Rule B Attachment and Memorandum in Support of Motion to Motion to Vacate Rule B Attachment in C.A. 3:22-cv-241-L, U.S. District Court, Northern District of Texas.	1.20	300.00
02/18/22	C. Saravia	Analysis of Local Rules for Northern District of Texas and sample pleadings to obtain additional information necessary to prepare and file Motion to Vacate Rule B attachments	0.50	137.50
02/18/22	C. Saravia	Preparation of pleadings to be filed in Northern District, including Motion, Memorandum in Support, Proposed Order, and Certificate of Conference	0.70	192.50
02/24/22	K. Morrison	Study and review of Bahamian seizure documentation; Telephone conference with client re case status; Study and review of local rules re hearing on attachment; Coordinating expedited consideration of same; Telephone conference with counsel in the Bahamas; Analyzing issues relative to potential bunker value	3.90	1,560.00



Our File Number: 40342-0001  
Invoice Number: 1234173

March 15, 2022  
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/24/22	J. Pill	Analyze correspondence from the assignee's counsel regarding POA issues; evaluate response options to same and strategic considerations going forward	0.40	156.00
02/24/22	J. Grabill	Analysis re: litigation strategy based on recent developments	0.30	105.00
02/24/22	A. Kraatz	Conferences with SDTX and NDTX courts regarding scheduling of prompt hearing required by Rule E	0.90	261.00
02/24/22	C. Clemson	Preparing documents to send to opposing counsel	0.50	85.00
02/25/22	K. Morrison	Study and review of email re potential release of vessel and requested POA in Uruguay; Telephone conference with Mark Healy re same; Telephone conference with Mark Healy re Bahamian counsel; Study and review of local rules re hearing date; Telephone conference with counsel in London re vessel release	0.90	360.00
02/25/22	M. Matthews	Receive and review briefing schedule issued by the Northern District of Texas	0.10	33.00
02/25/22	J. Grabill	Reviewed email correspondence with N.D. Tex. court staff and analyzed whether to file motion for expedited hearing on our motion to vacate Rule B attachment; multiple communications with Phelps team re: same	0.50	175.00
02/25/22	J. Grabill	Analyzed strategy for requesting extension of answer deadline in pending cases	0.30	105.00
02/25/22	J. Grabill	Attention to finalizing of pro hac vice motions in Texas actions	0.30	105.00
02/25/22	A. Kraatz	Conference and correspondences with opposing counsel regarding extension of time to answer	0.80	232.00





Our File Number: 40342-0001  
Invoice Number: 1234173

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/28/22	K. Morrison	Telephone conference with Kenra Whittaker re Bahamian seizure; Telephone conference with Jessica Hoppe re release of Freedom Fresh claims; Telephone conference with Mark Healy re case status and future handling	0.90	360.00
TOTAL FEES				\$ 23,218.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	13.70	350.00	4,795.00
J. Pill	5.70	390.00	2,223.00
K. Morrison	17.50	400.00	7,000.00
M. Matthews	2.30	330.00	759.00
R. Shelby	1.60	350.00	560.00
A. Kraatz	17.40	290.00	5,046.00
C. Saravia	7.60	275.00	2,090.00
D. Bebell	1.20	250.00	300.00
C. Clemson	2.30	170.00	391.00
C. Safaya	0.30	180.00	54.00
Totals	69.60		\$ 23,218.00

Disbursements Through February 28, 2022

Filing Fees	40.00
TOTAL DISBURSEMENTS	\$ 40.00
TOTAL FEES AND DISBURSEMENTS	\$ 23,258.00

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

April 7, 2022  
**Invoice Number: 1237458**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated April 7, 2022:

Total Fees	\$	10,532.00
Total Disbursements		400.00
<b>Total Of Invoice</b>	<b>\$</b>	<b>10,932.00</b>
<b>Less Funds Applied</b>	<b>\$</b>	<b>-10,932.00</b>
<b>Total of Invoice</b>	<b>\$</b>	<b>0.00</b>

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

April 7, 2022  
**Invoice Number: 1237458**

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For Professional Services Rendered Through March 31, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/02/22	K. Morrison	Study and review of correspondence concerning status of Italian fines and return of fund to Club; Receipt and review of correspondence concerning assignment of invoices; Corresponding with Bahamian counsel; Telephone conference with Mark Healy	0.80	320.00
03/02/22	M. Matthews	Receive and review Bank of America's motion for extension of time to answer; correspondence with defense team regarding status of admissions pro hac vice	0.20	66.00
03/03/22	K. Morrison	Telephone conference with Jessica Hoppe; Preparing call with counsel for KFW; Telephone conference with counsel for KFW; Telephone conference with Crystal Cruise CFO re charter payments; Corresponding with client concerning proof of ownership of assets on vessel; Corresponding with Bahamian counsel re	2.60	1,040.00



Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		intervention		
03/03/22	M. Matthews	Receive and review order granting Bank of America's Motion for Extension of Time; forward same to defense team	0.10	33.00
03/04/22	J. Grabill	Drafted motions for admission pro hac vice in two Texas actions for myself and K. Morrison and coordinated collection of associated materials for exhibits	0.50	175.00
03/07/22	J. Grabill	Refine the litigation strategy and attention to matter impacting the pro hac vice filings	0.50	175.00
03/08/22	K. Morrison	Confirming status of filing in attachment action; Telephone conference with Crystal Cruise CFO re status of documentation proving entitlement/ownership of assets; Telephone conference with Mark Healy; Receipt and review of invoicing proving ownership of assets; Corresponding with Kenra Whittaker re same	0.90	360.00
03/08/22	J. Grabill	Evaluate next steps going forward in multiple jurisdictions and upcoming filings	0.40	140.00
03/08/22	J. Grabill	Reviewed prior correspondence re: CRYSTAL ENDEAVOR and drafted email to KFW's counsel re: preserving assets on board	0.50	175.00
03/08/22	J. Grabill	Reviewed prior correspondence with Peninsula's counsel and drafted follow-up email to him demanding disclosure of specific invoices that have been assigned by Peninsula	0.50	175.00
03/08/22	J. Grabill	Reviewed email response from Peninsula's counsel and discussion re: same	0.30	105.00
03/08/22	J. Grabill	Provided litigation update to client	0.20	70.00
03/10/22	J. Grabill	Analyzed email from counsel for Speedcast Communications and	0.30	105.00



Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
Page Number 3

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		drafted email to client re: same		
03/11/22	J. Pill	Review the status of various domestic matters against Crystal Cruises and strategize regarding Peninsula's action in the S.D. Fla.; edit and revise Crystal Cruise's draft Answer for the action in the S.D. Fla.; address issues with the Southern District of Florida's Local Rules and related filing concerns	1.00	390.00
03/11/22	J. Grabill	Drafted answer to Peninsula's complaint in S.D. Fla. and multiple follow-up communications with Phelps team re: same; made revisions to draft answer to address comments from J. Pill	1.70	595.00
03/11/22	J. Grabill	Reviewed Peninsula's oppositions to our motions to vacate Rule B attachments in Southern and Northern Districts of Texas and associated exhibits, and analyzed potential arguments for our reply briefs	1.50	525.00
03/14/22	J. Grabill	Began drafting reply brief in further support of motions to vacate Peninsula's Rule B attachments	1.00	350.00
03/15/22	J. Pill	Analysis regarding litigation strategy in light of recent developments; correspond with Mark Healy regarding the matter; attention to upcoming filings in the S.D. Fla. and issues impacting same, including the need to certain administrative filings	0.60	234.00
03/15/22	J. Grabill	Continued drafting reply brief in further support of motions to vacate Peninsula's Rule B attachments	2.20	770.00
03/15/22	J. Grabill	Made revisions to pro hac vice motions to be filed in S.D. Fla. action	0.30	105.00
03/16/22	M. Matthews	Receive and review draft Reply in Support of Motion to Vacate; correspondence regarding the same	0.20	66.00



Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
Page Number 4

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/16/22	J. Pill	Review the revised Answer (for the S.D. Fla. case) prior to filing same; attention to related litigation issues and anticipated filings	0.30	117.00
03/16/22	J. Grabill	Made additional revisions to draft answer to be filed in S.D. Fla. action and draft reply to be filed in Rule B attachment actions in Northern and Southern Districts of Texas and circulated drafts to Phelps team for review	2.00	700.00
03/16/22	J. Grabill	Legal research and analysis re: whether Rule B attachment precludes assignment of Crystal Cruises funds to Mr. Healy	0.50	175.00
03/16/22	J. Grabill	Reviewed follow-up questions from counsel in Bahamas re: inventory on vessels and communications with client re: same	0.30	105.00
03/17/22	M. Matthews	Attention to filing Replies in support of Motions to Vacate	0.10	33.00
03/17/22	J. Pill	Attention to and address various filings on behalf of Crystal Cruises in the S.D. Fla. matter opposed to Peninsula; receipt and review of correspondence and voicemail from Peninsula's counsel regarding recent filings and threatening Rule 11 sanctions	0.50	195.00
03/17/22	J. Grabill	Strategize re: draft answer to be filed in S.D. Fla. action and draft reply to be filed in Rule B attachment actions in Northern and Southern Districts of Texas; made final revisions to these drafts and compiled necessary exhibits and coordinated filing of same with the various courts	2.20	770.00
03/17/22	J. Grabill	Reviewed messages from Peninsula's counsel threatening Rule 11 sanctions motion over our answer in S.D. Fla. action and	0.40	140.00



Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
Page Number 5

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		analyzed same; follow-up communications with Phelps team re: same and threats from opposing counsel		
03/17/22	D. Bebell	Telephone conferences with the U.S. District Clerk, Northern District of Texas, the clerk of Judge Lindsay's office and the clerk of Judge Ramirez's office regarding exhibits to the Reply Memorandum in Further Support of Motion to Vacate Rule B Attachment; electronically file and serve the Reply Memorandum and exhibits in Civil Action No. 3:22-cv-00241-L, the case pending in the Northern District of Texas; electronically file and serve the Reply Memorandum and exhibits in Civil Action No. 4:22-cv-00337, the case pending in the Southern District of Texas.	1.20	300.00
03/18/22	K. Morrison	Corresponding with counsel in Bahamas re status of intervention in seizure	0.40	160.00
03/18/22	J. Grabill	Address strategy if Rule B attachments are vacated	0.20	70.00
03/23/22	K. Morrison	Corresponding with counsel for GMBH concerning status of ENDEAVOR and assets aboard the vessel	0.60	240.00
03/23/22	J. Grabill	Strategize re: status of assets on Crystal Endeavor; reviewed response from KFW's counsel	0.30	105.00
03/24/22	K. Morrison	Telephone conference with Mark Healy re current case status and future handling	0.40	160.00
03/24/22	K. Morrison	Telephone conference with Kenra Whitakker re current status of Bahamian action	0.30	120.00
03/29/22	K. Morrison	Telephone conference with Mark Healey concerning status of ENDEAVOR; Email to Andrew Williams concerning recovery of	0.60	240.00



Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
Page Number 6

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		assets; Coordinating production of proof of ownership of cash assets; Checking on status of Rule B attachment		
03/30/22	K. Morrison	Receipt and review of proof of cash reserves on ENDEAVOR; Email to counsel for KFW; Receipt and review of correspondence from KFW	0.60	240.00
03/30/22	M. Matthews	Receive notice form court of initial conference setting and deadlines for disclosure of interested parties and draft Joint Discovery and Case Management Plan	0.10	33.00
03/30/22	J. Grabill	Analyzed documents sent by KFW's counsel re: claims related to Crystal Endeavor and cash-on-board spreadsheet from client and communications re: same	0.50	175.00
03/31/22	K. Morrison	Corresponding with counsel from London re ENDEAVOR; Coordinating information proving ownership of assets	0.50	200.00
03/31/22	K. Morrison	Telephone conference with Mark Healy re case status; Corresponding with counsel for KFW; Study and review of status of attempted dissolution of Rule B attachment	0.70	280.00
TOTAL FEES			\$	10,532.00





Our File Number: 40342-0001  
Invoice Number: 1237458

April 7, 2022  
Page Number 7

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Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	16.30	350.00	5,705.00
J. Pill	2.40	390.00	936.00
K. Morrison	8.40	400.00	3,360.00
M. Matthews	0.70	330.00	231.00
D. Bebell	1.20	250.00	300.00
Totals	29.00		\$ 10,532.00

Disbursements Through March 31, 2022

Court Filing Fees and Costs paid on acc	400.00
TOTAL DISBURSEMENTS	\$ 400.00
TOTAL FEES AND DISBURSEMENTS	\$ 10,932.00

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

May 4, 2022  
**Invoice Number: 1241843**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated May 4, 2022:

Total Fees	\$	3,001.00
Total Disbursements		200.00
<b>Total Of Invoice</b>	<b>\$</b>	<b>3,201.00</b>
<b>Less Funds Applied</b>	<b>\$</b>	<b>-3,201.00</b>
<b>Total Of Invoice</b>	<b>\$</b>	<b>0.00</b>

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

May 4, 2022  
**Invoice Number: 1241843**

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For Professional Services Rendered Through April 30, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/22	K. Morrison	Corresponding with counsel for KFW	0.30	120.00
04/04/22	C. Clemson	Reviewing order for conference and disclosure of interested parties for important case information and deadlines	0.30	51.00
04/05/22	J. Grabill	Call with counsel for KFW re: assets on board the Crystal Endeavor and follow-up call with K. Morrison re: same	0.30	105.00
04/06/22	K. Morrison	Corresponding with counsel for KFW re securing assets in Gibraltar; Telephone conference with Bahamian counsel re status of claim; Coordinating submission of proof of ownership of assets with regard to the ENDEAVOR; Telephone conference with court re status of hearing on Rule B issues; Telephone conference with Mark Healy; Receipt and review of email update from Bahamian counsel; Coordinating filing of additional appearance	1.10	440.00



Our File Number: 40342-0001  
Invoice Number: 1241843

May 4, 2022  
Page Number 2

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/06/22	J. Grabill	Reviewed file for documentation re: assets on board Crystal Endeavor and drafted email to client re: same	0.80	280.00
04/07/22	J. Pill	Review the status of the various matters pending domestically against Crystal Cruises, including the S.D. Fla. action, and next steps related to same	0.40	156.00
04/11/22	J. Grabill	Drafted certificate of interested parties for Southern District of Texas action and address issues related to same	0.50	175.00
04/13/22	K. Morrison	Preparing for and attending conference call with client re case status and future handling	0.50	200.00
04/14/22	M. Matthews	Address the need to file a Certificate of Interested Parties in the Southern District of Texas action; receive and review Certificate of Interested Parties; attention to issues related to same	0.20	66.00
04/14/22	J. Grabill	Strategize re: V.Ships using cash on board Endeavor to pay crew and drafted email to KFW's counsel re: same	0.30	105.00
04/14/22	D. Bebell	Finalize and serve Crystal Cruises, LLC's Certificate of Interested Parties.	0.10	25.00
04/19/22	J. Grabill	Reviewed email status update from counsel in Bahamas and drafted email to client forwarding same; follow-up email communications with K. Morrison and client re: status	0.30	105.00
04/19/22	J. Grabill	Drafted follow-up email to client requesting documentation re: assets on board the Endeavor	0.10	35.00
04/20/22	J. Grabill	Refine the litigation strategy going forward; follow-up analysis re: assignment of invoices by Peninsula to KFW	0.50	175.00



Our File Number: 40342-0001  
Invoice Number: 1241843

May 4, 2022  
Page Number 3

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/20/22	J. Grabill	Call with client re: litigation strategy	0.50	175.00
04/20/22	J. Grabill	Analyzed options for requesting expedited rulings on pending motions to vacate Rule B attachments and multiple communications re: same	0.50	175.00
04/20/22	A. Kraatz	Analysis regarding possible strategic options to expedite motions to vacate Rule B attachments	0.70	203.00
04/21/22	J. Grabill	Reviewed S.D. Fla. local rules and analyzed whether we can serve discovery on Peninsula in Florida action now or whether we must first conduct Rule 26 conference	0.40	140.00
04/22/22	K. Morrison	Preparing for and attending Telephone conference with client and Bahamian counsel	0.50	200.00
04/25/22	J. Grabill	Communications re: contacting N.D. Tex. magistrate judge who is considering motion to vacate Rule B attachment	0.20	70.00
TOTAL FEES			\$	3,001.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	4.40	350.00	1,540.00
J. Pill	0.40	390.00	156.00
K. Morrison	2.40	400.00	960.00
M. Matthews	0.20	330.00	66.00
A. Kraatz	0.70	290.00	203.00
C. Clemson	0.30	170.00	51.00
D. Bebell	0.10	250.00	25.00
Totals	8.50	\$	3,001.00



Our File Number: 40342-0001  
Invoice Number: 1241843

May 4, 2022  
Page Number 4

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Disbursements Through April 30, 2022

Filing Fees		200.00
TOTAL DISBURSEMENTS	\$	200.00
TOTAL FEES AND DISBURSEMENTS	\$	3,201.00

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

June 17, 2022  
**Invoice Number: 1250251**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated June 17, 2022:

Total Fees	\$	19,950.00
Total Disbursements		40.85
<b>Total Of Invoice</b>	<b>\$</b>	<b>19,990.85</b>
<b>Less Funds Applied</b>	<b>\$</b>	<b>-12,609.00</b>
<b>Total Of Invoice</b>	<b>\$</b>	<b>7,381.85</b>

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

June 17, 2022  
**Invoice Number: 1250251**

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For Professional Services Rendered Through May 31, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/22	K. Morrison	Strategize re status of lifting of Rule B attachment, assignment of counsel in Gibraltar; teleconference with Mark Healey re case status	0.60	240.00
05/02/22	J. Grabill	Strategize re: Peninsula's assignment of invoices to KFW bank and reviewed his initial email analysis re: same	0.40	140.00
05/02/22	A. Kraatz	Review and analysis regarding Peninsula's purported assignment of invoices to KFW and memo to file regarding same	2.40	696.00
05/03/22	J. Grabill	Reviewed documentation re: Endeavor and drafted affidavit for client to submit re: Crystal assets onboard the Endeavor; drafted email to client explaining and enclosing draft affidavit	1.20	420.00
05/03/22	A. Kraatz	Conference with the court regarding status of motion to vacate Rule B attachment	0.40	116.00
05/03/22	A. Kraatz	Analysis regarding maritime	0.30	87.00





Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 2

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/04/22	J. Pill	attorney in Gibraltar Review the status of the various matters pending domestically against Crystal Cruises, including the S.D. Fla. action, and evaluate Crustal Cruises' next steps; analyze holding issues in certain jurisdictions where the court has not yet moved on key filings and potentially addressing same with the court	0.30	117.00
05/04/22	J. Grabill	Review recent discussions with court staff in N.D. Tex. case re: pending motion to vacate Rule B attachment and reviewed his subsequent email re: same	0.20	70.00
05/04/22	A. Kraatz	Correspondence with client regarding retention of Gibraltar counsel	0.30	87.00
05/04/22	A. Kraatz	Memo to file regarding call with Magistrate's chambers regarding Motion to Vacate Rule B attachments	0.50	145.00
05/06/22	K. Morrison	Receipt and review of memorandum concerning status of court review of Rule B attachment briefing and coordinate future handling considering same	0.40	160.00
05/06/22	M. Matthews	Review draft Case Management Plan from opposing counsel and proposed revisions; correspondence with opposing counsel regarding the same and regarding a request to attend conference telephonically	0.10	33.00
05/06/22	J. Grabill	Reviewed draft Rule 26 report in SDTX case sent by Peninsula's counsel and evaluate revisions to same	0.40	140.00
05/06/22	J. Grabill	Reviewed final Rule 26 report filed with the court and attention to emails with court's case manager re: May 18 scheduling conference	0.20	70.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 3

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/06/22	J. Grabill	Reviewed and revised draft discovery requests to Peninsula in SD Florida action; analyzed whether we can serve discovery before Rule 26 conference and email communications with counsel re: same	0.90	315.00
05/06/22	A. Kraatz	Reviewed and revised draft Rule 26 report to Southern District of Texas	0.80	232.00
05/06/22	A. Kraatz	Drafting initial discovery requests to Peninsula	1.90	551.00
05/09/22	J. Grabill	Call with client re: his upcoming trip to Bahamas to identify assets on board the Symphony and Serenity, and re: strategy for Endeavor assets; reviewed new documentation from client re: assets on vessels and began revising affidavit re: Endeavor assets	1.00	350.00
05/09/22	A. Kraatz	Report to client regarding status of motions to vacate Rule B attachments	0.30	87.00
05/10/22	J. Pill	Analyze procedural issues related to Crystal Cruises's draft discovery and initial case procedures related to same; review certain SD Florida Local Rules impacting initial discovery and Crystal Cruises's corresponding requirements; strategic consideration to next steps	0.50	195.00
05/10/22	J. Grabill	Continued revising affidavit re: assets onboard the Endeavor per comments and new documentation from client	0.50	175.00
05/11/22	K. Morrison	Teleconference with Mark Healey; receipt and review of parts inventory list	0.40	160.00
05/12/22	A. Kraatz	Drafting discovery and scheduling report and proposed scheduling order in SD Fla. proceeding	1.80	522.00
05/12/22	C. Clemson	Reviewing Crystal Symphony IT	0.50	85.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 4

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/13/22	J. Grabill	Reviewed draft proposed scheduling order and discovery plan for SD Fla. action and analyzed strategy for presenting same to Peninsula's counsel	0.30	105.00
05/13/22	C. Clemson	Reviewing Crystal Serenity IT equipment list and formatting in Excel Spreadsheet	0.50	85.00
05/16/22	M. Matthews	Strategize regarding logistics and details for the upcoming initial conference with the SDTX court; receive and review Peninsula's Motion for Summary Judgment, Memorandum in Support, and accompanying evidence; review Judge Hanks's procedures to determine whether Peninsula complied with the judge procedures and local requirements; correspondence with counsel regarding the deadline to file a Response, and regarding local motion practice	1.20	396.00
05/16/22	J. Grabill	Reviewed Peninsula's motions for summary judgment in the Texas actions and analyzed strategy for responding to same; multiple email communications with counsel re: strategy	1.70	595.00
05/16/22	A. Kraatz	Conference with case manager for Judge Edison regarding upcoming scheduling conference	0.40	116.00
05/17/22	M. Matthews	Strategize regarding plans for the initial conference with the SDTX magistrate; receive and review proposed Docket Control Order	0.20	66.00
05/17/22	J. Grabill	Refine the strategy re: discovery, responding to Peninsula's summary judgment motions, and tomorrow's scheduling conference in Southern District of Texas action; prepare for	0.50	175.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 5

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		tomorrow's court conference		
05/17/22	J. Grabill	Legal research re: premature summary judgment motions filed before any discovery has occurred	0.70	245.00
05/18/22	M. Matthews	Review Case Management P Lan, proposed Scheduling Order, and Motion to Vacate in preparation for Initial Conference with the court; attend Initial Conference; teleconference with counsel to discuss results of the Initial Conference and whether to try to get agreement from opposing counsel to abate the Motions for Summary Judgment; receive and consider correspondence from counsel for Peninsula regarding possible dismissal of the Florida action and discovery in order to respond to the Motions for Summary Judgment filed by Peninsula	2.80	924.00
05/18/22	J. Pill	Review and edit the draft Joint Scheduling Report and proposed order on same in the SD Florida action brought by Peninsula; review certain SD Florida Local Rules regarding the scheduling report and related details; review correspondence to and from Peninsula's counsel regarding case administration of the various lawsuits; strategic consideration of Peninsula's request to voluntarily dismiss the SD Florida action and related case issues, mainly focusing on the Texas litigation	1.10	429.00
05/18/22	J. Grabill	Prepared for and attended initial scheduling conference with magistrate judge in Peninsula's Southern District of Texas action; follow-up meet-and-confer call with Peninsula's counsel re: our request that he withdraw summary judgment motions	2.00	700.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 6

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/18/22	J. Grabill	Refine the strategy for SD Fla. action in light of Peninsula's intent to seek dismissal of that action and follow-up communications with Phelps team re: same; drafted email update to client re: recent developments in Peninsula actions	1.20	420.00
05/18/22	A. Kraatz	Analysis regarding Peninsula's proposal to dismiss the SD Fla. suit and possible strategy for responding to same	0.90	261.00
05/19/22	M. Matthews	Receive and review minute entry regarding the recent scheduling conference	0.10	33.00
05/19/22	J. Grabill	Drafted email response to Peninsula's counsel objecting to dismissal of the SD Fla. action without prejudice and requesting withdrawal of summary judgment motions	0.50	175.00
05/19/22	J. Grabill	Reviewed docket control order issued in Southern District of Texas action; reviewed email from court clerk re: scheduling of hearing on motion to vacate Rule B attachment in Southern District of Texas action and multiple follow-up communications re: same	0.60	210.00
05/19/22	J. Grabill	Reviewed Peninsula's motion to dismiss the SD Fla. action without prejudice and analyzed potential response arguments	0.50	175.00
05/19/22	J. Grabill	Began drafting opposition to Peninsula's motion for summary judgment in Southern District of Texas action	2.20	770.00
05/19/22	A. Kraatz	Correspondences with Court regarding setting of hearing on Motion to Vacate and evaluate the strategy in SD Fla. action in light of same	0.70	203.00
05/20/22	M. Matthews	Receive and review order setting hearing on Motion to Vacate;	0.10	33.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 7

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		correspondence with defense team regarding the same		
05/20/22	J. Grabill	Continued drafting opposition to Peninsula's motion for summary judgment in Southern District of Texas action	2.50	875.00
05/20/22	C. Clemson	Reviewing docket control order for important case information and deadlines	0.40	68.00
05/23/22	J. Grabill	Reviewed briefing and key cases and prepared outline for today's hearing on motion to vacate Rule B attachment in Southern District of Texas action; call with client re: same	2.90	1,015.00
05/23/22	J. Grabill	Reviewed email from court staff canceling today's hearing on motion to vacate Rule B attachment and follow-up emails re: rescheduling hearing; drafted email to client re: same	0.30	105.00
05/24/22	M. Matthews	Correspondence regarding Judge Hanks's temperament and plans for handling hearing on Motion to Vacate	0.10	33.00
05/24/22	J. Grabill	Continued drafting opposition to Peninsula's motion for summary judgment in Southern District of Texas action	2.80	980.00
05/25/22	J. Grabill	Legal research re: dismissal with or without prejudice under Rule 41 in connection with Peninsula's motion	0.90	315.00
05/25/22	J. Grabill	Began drafting opposition to Peninsula's motion to dismiss SD Fla. action without prejudice	2.60	910.00
05/26/22	J. Grabill	Continued drafting opposition to Peninsula's motion to dismiss SD Fla. action without prejudice; attention to strategic considerations	2.60	910.00
05/26/22	J. Grabill	Reviewed new decision by 5th Circuit reversing Texas trial court for granting summary judgment	0.80	280.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 8

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		prior to discovery and made revisions to draft opposition to Peninsula's summary judgment motion to incorporate same		
05/26/22	J. Grabill	Legal research re: requirements for Rule 56(d) declarations regarding need for additional discovery before responding to summary judgment motions	0.60	210.00
05/26/22	A. Kraatz	Reviewed and revised draft opposition to motion to dismiss SD Fla. action	0.70	203.00
05/26/22	C. Clemson	Reviewing Docket Control Order for important filing deadlines and case information	0.30	51.00
05/27/22	J. Grabill	Reviewed Peninsula's amended complaint in Southern District of Texas action and analyzed impact on pending motion to vacate Rule B attachment and motion for summary judgment	0.80	280.00
05/27/22	J. Grabill	Legal research re: whether amended complaint moots pending summary judgment motion by plaintiff	0.60	210.00
05/27/22	J. Grabill	Continued drafting opposition to Peninsula's motion to dismiss Florida action without prejudice	1.10	385.00
05/27/22	J. Grabill	Made revisions to draft opposition to Peninsula's summary judgment motion to address impact of amended complaint	0.80	280.00
05/31/22	K. Morrison	Attending hearing on motion to dismiss Rule B attachment; coordinating next steps concerning same	0.60	240.00
05/31/22	M. Matthews	Receive and review Peninsula's First Amended Complaint	0.20	66.00
05/31/22	J. Grabill	Reviewed key cases and briefing and prepared for today's rescheduled hearing on motion to vacate Rule B attachment in	2.20	770.00



Our File Number: 40342-0001  
Invoice Number: 1250251

June 17, 2022  
Page Number 9

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/31/22	J. Grabill	Southern District of Texas action by Peninsula Attended hearing on motion to vacate Rule B attachment; based on the foregoing, evaluated next steps and strategy; drafted email to client summarizing hearing	1.30	455.00
TOTAL FEES			\$	19,950.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	37.80	350.00	13,230.00
J. Pill	1.90	390.00	741.00
K. Morrison	2.00	400.00	800.00
M. Matthews	4.80	330.00	1,584.00
A. Kraatz	11.40	290.00	3,306.00
C. Clemson	1.70	170.00	289.00
Totals	59.60		\$ 19,950.00

Disbursements Through May 31, 2022

Online Research Database Charges	0.20
Photocopies Internal	40.65
TOTAL DISBURSEMENTS	\$ 40.85
TOTAL FEES AND DISBURSEMENTS	\$ 19,990.85

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.





POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

July 7, 2022  
**Invoice Number: 1253271**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated July 7, 2022:

Total Fees	\$	11,928.00
<b>Total Of Invoice</b>	<b>\$</b>	<b>11,928.00</b>

Other Outstanding Invoices For This Matter As Of July 7, 2022:

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Balance</u>
06/17/22	1250251	7,381.85
<b>TOTAL DUE FOR THIS MATTER</b>		<b>\$ 19,309.85</b>

If payment has been made on any of these invoices, please disregard the listing of such invoice(s) above.

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

July 7, 2022  
**Invoice Number: 1253271**

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For Professional Services Rendered Through June 30, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/22	K. Morrison	Study and review of correspondence from counsel from Peninsula concerning discovery demands and coordinate response to same	0.30	120.00
06/01/22	K. Morrison	Study and review of opposition to motion to dismiss Florida state court action	0.40	160.00
06/01/22	J. Pill	Review and edit Crystal Cruise's Opposition to Plaintiff's Motion to Dismiss in the SD Fla. action; strategic consideration to litigation decisions in the SD Fla. action and the impact of same on the pending Texas actions	0.30	117.00
06/01/22	J. Grabill	Review email and notice of deposition from Peninsula and analyze strategy for response	0.40	140.00
06/01/22	J. Grabill	Additional revisions to draft opposition to Peninsula's motion for summary judgment and strategic issues impacting same: outstanding issues to finalize; made	2.40	840.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 2

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/01/22	J. Grabill	final revisions to opposition to Peninsula's motion to dismiss the S.D. Fla. action without prejudice Made revisions to draft affidavit re: assets onboard the Endeavor and email communications with Crystal's counsel in the Bahamas re: same	0.30	105.00
06/02/22	K. Morrison	Corresponding with counsel in Bahamas re proof of ownership of good aboard vessel	0.20	80.00
06/02/22	J. Grabill	Reviewed and edit the revised draft of opposition to Peninsula's summary judgment motion and made additional revisions to same	0.80	280.00
06/02/22	A. Kraatz	Drafting opposition to Peninsula's motion for summary judgment and necessary pleadings associated with same	2.90	841.00
06/03/22	K. Morrison	Preparing for and attending telephone conference concerning current case status and future handling	1.00	400.00
06/03/22	M. Matthews	Receive and review draft Response to Motion for Partial Summary Judgment; propose revisions to same; review local rules for submission and reply deadlines; address issues related to the timing of the brief and formatting requirements in the Southern District of Texas and plans for further handling; review, revise, and finalize Responses and supporting documents to be filed in the Northern and Southern Districts of Texas; finalize and execute the Rule 56 declarations in support of the Responses; receive and review Minute Entry for hearing on Motion to Vacate; receive and execute revised declaration for the Northern District action; coordinate same for filing and further court	2.20	726.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 3

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/03/22	J. Pill	action Strategic consideration to the status of the Texas matters and timeline for upcoming filings, with attention to Crystal Cruises' recent briefing in the SD Fla. action; teleconference with Mark Healy to discuss the overall litigation strategy and next steps in the process	0.90	351.00
06/03/22	J. Grabill	Attention to finalizing oppositions to Peninsula's summary judgment motions	0.30	105.00
06/03/22	J. Grabill	Reviewed final drafts of SD TX and ND TX oppositions to Peninsula's summary judgment motions and made final revisions to same	0.70	245.00
06/03/22	A. Kraatz	Revisions to summary judgment pleadings for filing today	2.90	841.00
06/03/22	A. Kraatz	Conference with client regarding ongoing proceedings in multiple forums	0.60	174.00
06/03/22	D. Bebell	Review the declarations to accompany the Partial Summary Judgment Motions; finalize and serve Crystal Cruises' Response to Peninsula's Partial Summary Judgment Motion in the U.S. District Court for the Southern District of Texas; finalize and serve Crystal Cruises' Response to Peninsula's Partial Summary Judgment Motion and the Brief in Support of Response in the U.S. District Court for the Northern District of Texas.	1.60	400.00
06/06/22	K. Morrison	Receipt and review of correspondence concerning counsel in Gibraltar, motion practice in Rule B attachment and witness depositions	0.40	160.00
06/06/22	J. Grabill	Drafted proposed email response to	0.40	140.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 4

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/06/22	J. Grabill	Peninsula's counsel re: request for deposition of Au Fook Yew	0.20	70.00
06/06/22	A. Kraatz	Further analysis re: status of Endeavor and strategy for Gibraltar counsel	0.90	261.00
06/07/22	K. Morrison	Conference with Gibraltar attorney and correspondences with client and Gibraltar attorney regarding retention issues	0.40	160.00
06/08/22	K. Morrison	Receipt and review of new filing concerning motion to dismiss	0.60	240.00
06/08/22	J. Pill	Receipt and review of correspondence re witness deposition; coordinating objection to same	0.40	156.00
06/08/22	J. Grabill	Review correspondence from opposing counsel seeking to set the deposition of Au Fook Yu; strategic consideration to litigation issues related to same, mainly opposing counsel's attempt to advance discovery in the SD Fla. action; review correspondence with Mark Healy regarding same; review Southern District of FLorida rules regarding same	1.50	525.00
06/08/22	A. Kraatz	Call with client re: Peninsula's request for deposition of Au Yook Few; legal research re: whether Peninsula can simply notice deposition or whether a subpoena is required and communications with K. Morrison and A. Kraatz re: same; made revisions to draft response to Peninsula re: deposition and sent same	0.30	87.00
06/09/22	J. Grabill	Review of Mr. Sim's latest correspondence regarding discovery issues and analysis regarding possible response to same	0.40	140.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 5

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		dismiss Florida action without prejudice and communications with Phelps team re: same		
06/09/22	J. Grabill	Reviewed Peninsula's reply email re: request for Au Fook Yew deposition and analyzed whether to respond to same; follow-up email communications with client	0.30	105.00
06/13/22	J. Grabill	Reviewed Peninsula's reply brief in further support of motion for partial summary judgment in SD Texas action and analyzed whether to file a sur-reply	0.70	245.00
06/13/22	J. Grabill	Started drafting sur-reply to respond to Peninsula's reply brief on its summary judgment motion	1.10	385.00
06/16/22	M. Matthews	Receive and review Peninsula's supplemental responses to the motions to vacate in the Southern and Northern Districts of Texas; analyze local rules regarding the procedural propriety of Peninsula's supplemental response; consider whether the supplemental response can be characterized as a Sur-Reply; correspondence regarding the same	0.50	165.00
06/16/22	J. Grabill	Call with client re: documents needed by new counsel in Gibraltar; compiled correspondence with KFW's counsel re: Endeavor for client's counsel in Gibraltar and multiple follow-up email communications with client and counsel re: same	0.40	140.00
06/16/22	J. Grabill	Reviewed Peninsula's supplemental brief in Texas actions re: pending motions to vacate Rule B attachments and analyzed whether to respond to same; reviewed analysis re: local rules regarding supplemental submissions in Texas federal courts	0.90	315.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 6

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/17/22	M. Matthews	Receive and review order setting oral argument on the motion to vacate; correspondence regarding the same; review local rules of the ND Texas regarding appearance by an attorney admitted pro hac vice and regarding supplemental filings	0.40	132.00
06/17/22	J. Grabill	Reviewed order from ND Texas scheduling hearing on our motion to vacate Rule B attachment; reviewed email from Peninsula's counsel re: scheduling conflict and reviewed amended order issued by the court	0.30	105.00
06/17/22	J. Grabill	Reviewed Peninsula's reply brief in further support of its motion for partial summary judgment in ND Texas action	0.30	105.00
06/22/22	J. Grabill	Reviewed ruling by SD Texas denying our motion to vacate Rule B attachment and multiple communications re: same; drafted email to client summarizing ruling and next steps	0.50	175.00
06/22/22	J. Grabill	Legal research re: whether we can immediately appeal ruling denying motion to vacate Rule B attachment	0.50	175.00
06/22/22	J. Grabill	Reviewed notice of supplemental authority filed by Peninsula in ND Texas action informing that court of ruling by SD Texas on motion to vacate Rule B attachment, and analyzed whether to respond to same	0.20	70.00
06/23/22	K. Morrison	Study and review of court ruling on motion to lift attachment	0.50	200.00
06/23/22	J. Grabill	Call with client to discuss strategy and next steps in light of denial of motion to vacate Rule B attachment; follow-up communications re: same	0.60	210.00
06/24/22	J. Grabill	Reviewed Peninsula's supplemental filing in SD Fla. re: recent ruling on	0.20	70.00



Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 7

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		motion to vacate Rule B attachment in Texas and analyzed whether to respond to same		
06/24/22	A. Kraatz	Conference with Mr. Simms regarding possible settlement and analysis regarding Mr. Simms' claims with respect to amounts seized pursuant to Rule B attachments	0.80	232.00
06/25/22	K. Morrison	Coordinating negotiations with opposing counsel on seized bank accounts	0.20	80.00
06/29/22	J. Grabill	Reviewed initial settlement offer email from Peninsula's counsel and analyzed same; drafted email response to Peninsula requesting confirmation of attached funds amounts; drafted email to client re: Peninsula's settlement offer	0.60	210.00
06/29/22	J. Grabill	Evaluate and confirm amount of funds attached by Peninsula in BOA accounts	0.30	105.00
06/30/22	K. Morrison	Study and review of correspondence from opposing counsel challenging assignment; study and review of related documentation; coordinating response	0.60	240.00
06/30/22	J. Grabill	Follow-up communications re: Peninsula's settlement offer and re: confirming BOA amounts that have been attached	0.30	105.00
06/30/22	J. Grabill	Reviewed email from Peninsula's counsel questioning client's authority to act for Crystal and Phelps' authority to appear in litigations; reviewed docket in Florida assignment-for-benefit-of-creditors proceedings and selected pleadings and analyzed authority issue	1.00	350.00
06/30/22	A. Kraatz	Conferences with Mr. Guy regarding Bank of America	0.50	145.00





Our File Number: 40342-0001  
Invoice Number: 1253271

July 7, 2022  
Page Number 8

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		garnishment and need for documents with respect to same		
TOTAL FEES			\$	11,928.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	15.60	350.00	5,460.00
J. Pill	1.60	390.00	624.00
K. Morrison	4.60	400.00	1,840.00
M. Matthews	3.10	330.00	1,023.00
A. Kraatz	8.90	290.00	2,581.00
D. Bebell	1.60	250.00	400.00
Totals	35.40		\$ 11,928.00

TOTAL FEES AND DISBURSEMENTS \$ 11,928.00

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

July 31, 2022  
**Invoice Number: 1257673**

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**REMITTANCE ADVICE**

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

Total For Invoice Dated July 31, 2022:

Total Fees	\$	8,961.00
Total Disbursements		100.00
<b>Total Of Invoice</b>	<b>\$</b>	<b>9,061.00</b>

Other Outstanding Invoices For This Matter As Of August 2, 2022:

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Balance</u>
06/17/22	1250251	7,381.85
07/07/22	1253271	11,928.00
<b>TOTAL DUE FOR THIS MATTER</b>		<b>\$ 28,370.85</b>

If payment has been made on any of these invoices, please disregard the listing of such invoice(s) above.

Please enclose this Remittance Advice with your payment.

If payment is made by wire transfer, please remit payment to: JP Morgan Chase Bank, N.A.  
New Orleans, Louisiana  
ABA Number: 065400137  
Account Number: [REDACTED]  
International SWIFT Code: CHASUS33

INVOICE DUE UPON RECEIPT



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621



POST OFFICE BOX 974798  
DALLAS, TEXAS 75397-4798  
(813) 472-7550  
TAX IDENTIFICATION NUMBER: 72-0358621

Mark C. Healy  
As Assignee on Behalf of Crystal Cruises, LLC  
Michael Moecker & Associates, Inc.  
814 Prudential Dr  
Jacksonville, FL 33207

July 31, 2022  
**Invoice Number: 1257673**

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For Professional Services Rendered Through July 31, 2022

Description Of Matter: General Admiralty Advice

**Our File Number:** 40342-0001

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/01/22	M. Matthews	Review serial correspondence with counsel for Peninsula and with Mr. Grabill regarding Mr. Kraatz's pro hac vice admission, Healy's authority to conduct business on behalf of Crystal, and Peninsula's settlement demand	0.30	99.00
07/01/22	J. Grabill	Additional analysis and communications with and client re: Peninsula's settlement offer and Peninsula's inquiry re: authority to act; reviewed email from client's counsel in Florida assignment-for-benefit-of-creditors proceeding re: authority issue and strategic considerations regarding same	0.90	315.00
07/05/22	M. Matthews	Correspondence with opposing counsel, and counsel for BoA regarding garnished amounts, Healy's authority to continue to direct the handling of Crystal's assets, and the pending settlement demand; receive and review draft answer to be filed in the Southern District of Texas; address issues	0.60	198.00



Our File Number: 40342-0001  
Invoice Number: 1257673

July 31, 2022  
Page Number 2

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		related to same prior to filing		
07/05/22	J. Grabill	Strategic analysis re: responding to Peninsula's threat re: authority to act	0.40	140.00
07/05/22	J. Grabill	Reviewed and revised draft answer to Peninsula's amended complaint in Southern District of Texas action and coordinated filing of same	0.60	210.00
07/05/22	J. Grabill	Reviewed bills from ParrisWhittaker firm for work in Bahamas proceedings and drafted email to client forwarding same	0.20	70.00
07/05/22	A. Kraatz	Drafting answer to Southern District of Texas amended Complaint	1.30	377.00
07/07/22	M. Matthews	Review correspondence with counsel for BoA regarding amounts garnished and timing of BoA's answer	0.10	33.00
07/07/22	J. Grabill	Additional analysis re: BOA issues; drafted email to BOA's counsel threatening motion to compel; reviewed multiple email responses from BOA re: amount of attached funds and analyzed settlement strategy	0.90	315.00
07/07/22	A. Kraatz	Conference with Bank of America's counsel regarding status of garnishment	0.30	87.00
07/08/22	M. Matthews	Correspondence with opposing counsel regarding Peninsula's disclosures and corporate representative deposition; attention to attendance at hearing in the Northern District of Texas on the Motion to Vacate	0.10	33.00
07/08/22	J. Grabill	Further analysis re: communications today with BOA's counsel and research re: whether NDTX writ attaches Euros in London BOA account; analyzed caselaw re: whether NDTX writ	1.10	385.00



Our File Number: 40342-0001  
Invoice Number: 1257673

July 31, 2022  
Page Number 3

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		attaches Euros in London BOA account		
07/08/22	J. Grabill	Reviewed Peninsula's initial disclosures, document requests, and new deposition notices; analyzed strategy for responding to Peninsula's new discovery; drafted email to client re: Peninsula's new discovery and re: settlement recommendation	1.30	455.00
07/08/22	A. Kraatz	Analysis regarding propriety of attachment of Euro-Denominated accounts and multiple conferences with Bank of America's counsel regarding status of garnished funds	2.80	812.00
07/11/22	M. Matthews	Receive and review orders issued by the Northern District of Texas regarding the impact of the Southern District's denial of the Motion to Vacate and regarding attendance at upcoming hearing by Zoom	0.10	33.00
07/11/22	J. Grabill	Reviewed NDTX order asking parties to address SDTX ruling at upcoming hearing on motion to vacate Rule B attachment and strategic consideration to same	0.30	105.00
07/11/22	J. Grabill	Call with client to discuss Peninsula's claims and damages and our settlement strategy; follow-up communications addressing same	1.50	525.00
07/11/22	A. Kraatz	Communications with Mr. Simms and Mr. Moeller regarding Bank of America Account balances and possible settlement of claims	1.40	406.00
07/12/22	K. Morrison	Study and review of file materials re current case status to prepare for upcoming hearing	0.40	160.00
07/12/22	A. Kraatz	Correspondences with Mr. Moeller regarding balance of Bank of America accounts	0.60	174.00



Our File Number: 40342-0001  
Invoice Number: 1257673

July 31, 2022  
Page Number 4

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/12/22	A. Kraatz	Preparation for hearing on motion to vacate Rule B attachment including review of briefing and analysis regarding possible preclusive effect of Houston court's ruling	3.60	1,044.00
07/13/22	K. Morrison	Preparing for and attending hearing to lift Rule B attachment	0.90	360.00
07/13/22	J. Grabill	Analyze the outcome of today's NDTX hearing on motion to vacate Rule B attachment and strategy for next steps	0.30	105.00
07/13/22	J. Grabill	Reviewed additional information from BOA's counsel and follow-up communications with re: same	0.20	70.00
07/13/22	A. Kraatz	Attendance at hearing on motion to vacate rule B attachment	1.80	522.00
07/13/22	A. Kraatz	Preparation for hearing on motion to vacate rule B attachment including analysis regarding additional cases in support of our position	1.60	464.00
07/14/22	K. Morrison	Receipt and review of correspondence from opposing counsel re settlement and production of assignment	0.20	80.00
07/14/22	J. Grabill	Reviewed follow-up email from Peninsula's counsel re: discovery and settlement and analyzed strategy for responding to same	0.30	105.00
07/14/22	A. Kraatz	Correspondence with Mr. Sims regarding his discovery requests and possible settlement of claim	0.40	116.00
07/15/22	J. Grabill	Reviewed draft document requests to Peninsula and evaluate the potential discovery strategy, including a possible Rule 30(b)(6) notice to Peninsula	0.40	140.00
07/15/22	A. Kraatz	Drafting discovery requests to Peninsula in Houston action	0.60	174.00
07/16/22	A. Kraatz	Report to client regarding hearing	0.20	58.00



Our File Number: 40342-0001  
Invoice Number: 1257673

July 31, 2022  
Page Number 5

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		on Dallas motion to vacate attachment		
07/20/22	J. Grabill	Strategic consideration to discovery issues in light of Peninsula's failure to produce assignment documentation	0.20	70.00
07/20/22	A. Kraatz	Conference with Mr. Simms regarding possible settlement of claim	0.40	116.00
07/21/22	J. Grabill	Reviewed order from Southern District of Florida granting Peninsula's motion to dismiss that action without prejudice; reviewed Peninsula's notice to Northern District of Texas re: Florida ruling	0.20	70.00
07/27/22	J. Grabill	Analyze settlement strategy and issuance of document requests to Peninsula; reviewed and revised draft document requests to Peninsula and follow-up email communications re: same	0.70	245.00
07/27/22	A. Kraatz	Correspondence with Mr. Simms regarding request for KFW assignment and written discovery	0.30	87.00
07/27/22	A. Kraatz	Revisions to draft discovery requests to Peninsula	0.70	203.00
TOTAL FEES			\$	8,961.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	9.50	350.00	3,325.00
K. Morrison	1.50	400.00	600.00
M. Matthews	1.20	330.00	396.00
A. Kraatz	16.00	290.00	4,640.00
Totals	28.20		\$ 8,961.00





Our File Number: 40342-0001  
Invoice Number: 1257673

July 31, 2022  
Page Number 6

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Disbursements Through July 31, 2022

Filing Fees		100.00
TOTAL DISBURSEMENTS	\$	100.00
TOTAL FEES AND DISBURSEMENTS	\$	9,061.00

Please include the enclosed Remittance Advice with your payment, and if you are paying any of the past due invoices listed above, please include the Remittance Advice for each of those invoices.

**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 PHELPS DUNBAR, LLP AS SPECIAL COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD FEBRUARY 11, 2022 THROUGH JULY 31, 2022**

**THIS CAUSE** came before the Court upon the *Motion for Approval and Payment of Fees and Reimbursement of Expenses Incurred by Phelps Dunbar, LLP 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 \$77,590.00 and reimbursement of expenses in the amount of \$780.85, for a total interim award of \$78,370.85, 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. Phelps Dunbar, LLP, as special counsel to the Assignee, is awarded fees in the amount of \$77,590.00 and expenses in the amount of \$780.85, for a total award of \$78,370.85, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Phelps Dunbar, LLP the sum of \$28,370.85, which is the balance owed after application of the retainer already paid by the Assignee to Phelps Dunbar, LLP.
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 Phelps Dunbar, LLP 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