

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 PARRISWHITTAKER AS BAHAMAS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD OF FEBRUARY 24, 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 \$49,800.00, reimbursement of expenses in the amount of \$1,753.90, and Bahamian value-added taxes (VAT) in the amount of \$4,403.54, for a total award of \$55,957.44¹ incurred by ParrisWhittaker in connection with its representation of the Assignee during the period of February 24, 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

¹ ParrisWhittaker was paid a retainer of \$24,482.80 from which it applied \$24,454.67 to the payment of invoices 3090 and 3091. ParrisWhittaker is now holding a retainer balance of \$28.13. Accordingly, of the \$55,957.44 total requested compensation, after accounting for the \$24,454.67 retainer already applied and the \$28.13 retainer remaining in trust, as well as certain discounts provided by ParrisWhittaker, **the Assignee seeks authorization to pay an additional \$31,003.69 to ParrisWhittaker.**

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 ParrisWhittaker as his counsel in the Bahamas to perform necessary legal services in connection with the Bahamian arrest proceedings of the Crystal Symphony and Serenity vessels (the “Vessels”) formerly operated by Crystal Cruises LLC. Various assets and cash owned by Crystal Cruises LLC (the “Estate Assets”) were located on board the arrested Vessels on the Petition Date.

4. On March 25, 2022, the Court entered an order approving the employment of ParrisWhittaker as Bahamas counsel to the Assignee.

5. The Assignee successfully negotiated the sale of assets of the assignment estate of Crystal Cruises, LLC (the “Assignment Estate”), including the Estate Assets, in part, due to the efforts of ParrisWhittaker in protecting the Assignee’s and the Assignment Estate’s interests in the Bahamian proceedings and in connection with the sale of the Estate Assets. The Court approved the sale on July 1, 2022.

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

7. ParrisWhittaker, as Bahamas counsel to the Assignee, has incurred fees in the amount of \$49,800.00 for legal services provided to the Assignee during the Application Period as identified in the chart below and expenses in the amount of \$1,753.90 in the nature of photocopy charges, travel expenses, and other expenses. Additionally, ParrisWhittaker advises that a value-

added tax (VAT) on goods and services, including legal fees, is required in the Bahamas. Applicant’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
Kenra Parris-Whittaker	85.00	\$550.00	\$46,750.00
Sheila Taylor	15.25	\$200.00	\$3,050.00
TOTALS	100.25		\$49,800.00

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Reproductions/Paper Charges	\$831.00
Travel Costs	\$182.90
Admiralty Marshal	\$200.00
Flash Drives (5)	\$100.00
Process of Service	\$315.00
Filing Fee	\$125.00
Total Expenses	\$1,753.90

8. The Assignee respectfully requests that the Court approve this Motion and allow ParrisWhittaker an interim award of fees in the amount of \$49,800.00, reimbursement of expenses in the amount of \$1,753.90, and value-added tax (VAT) in the amount of \$4,403.54, for a total of \$55,957.44 for the period of February 24, 2022 through July 31, 2022.

9. ParrisWhittaker was paid a retainer of \$24,482.80 from which it applied \$24,454.67 to the payment of invoices 3090 and 3091. ParrisWhittaker is now holding a retainer balance of \$28.13. Accordingly, of the \$55,957.44 total requested compensation, after accounting for the \$24,454.67 retainer already applied and the \$28.13 retainer remaining in trust, as well as certain discounts provided by ParrisWhittaker, **the Assignee seeks authorization to pay an additional \$31,003.69 to ParrisWhittaker.**

10. 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 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 \$49,800.00 in compensation for services rendered by ParrisWhittaker, reimbursement of expenses incurred by ParrisWhittaker in the amount of \$1,753.90, and value-added tax (VAT) in the amount of \$4,403.54, for a total award of \$55,957.44, (iii) authorizing the Assignee to pay ParrisWhittaker \$31,003.69, and for ParrisWhittaker to apply the \$28.13 balance of its retainer; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: August 4, 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 4, 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)

Mark Healy, Assignee of Crystal Cruises LLC
1885 Marina Mile Blvd., Suite 103
Fort Lauderdale, FL 33315
United States

03702-Mark Healy, Assignee of Crystal Cruises LLC

Arrest M/V "Crystal Symphony"

Type	Date	Notes	Quantity	Attorney	Rate	Total
Service	02/24/2022	Receipt, review and consideration of email correspondence from Kent Morrison. Drafting a reply to the same. Telephone conference with KM.	0.75	KPW	\$550.00	\$412.50
Service	02/25/2022	Receipt, review and consideration of emails and attachments from Arthur Kratz. Drafting copies to obtain a date to review all files at the Supreme Court.	1.25	KPW	\$550.00	\$687.50
Service	03/01/2022	Attending Court obtaining copies of documents available. Considering same for the purposes of strategy and applications to be filed.	2.25	KPW	\$550.00	\$1,237.50
Service	03/02/2022	Receipt, review and consideration of email from KH. Drafting email response to the same.	0.50	KPW	\$550.00	\$275.00
Service	03/04/2022	Drafting correspondence to the Court requesting a review of all files concerning the two Vessels. Telephone conference with COurt's in Nassau and Freeport.	0.75	KPW	\$550.00	\$412.50
Service	03/08/2022	Drafting correspondence to AM requesting removal of all items belonging to MH onboard the vessels.Receipt, review and consideration of documents from Ricardo Celrio and KM.	2.25	KPW	\$550.00	\$1,237.50
Service	03/09/2022	Drafting documents to intervene in various matters.	3.25	KPW	\$550.00	\$1,787.50
Service	03/10/2022	Continued drafting of application to intervene. Telephone conference with the Court re access to files.	1.00	KPW	\$550.00	\$550.00
Service	03/16/2022	Receipt, review and consideration of email and atachments from Jeremy Grabhill.	1.25	KPW	\$550.00	\$687.50
Service	03/17/2022	Drafting email re documents forwarded by Jeremy Grabill.	0.25	KPW	\$550.00	\$137.50
Service	03/18/2022	Telephone conference with MH. Telephone conference with Ricardo. receipt review and consideration of various document from Richard.	3.75	KPW	\$550.00	\$2,062.50
Service	03/24/2022	Telephone conference with KM.	0.25	KPW	\$550.00	\$137.50
Service	03/28/2022	Drafting correspondence to KM, requesting further documentation and answers to queries.Attending Court review of all files, Review of DNB	3.50	KPW	\$550.00	\$1,925.00

Bank arrest files.

Expense	03/29/2022	Other: Filing Fee 2 Exparte Summons	1.00	NP	\$150.00	\$150.00
Service	03/29/2022	Drafting submissions on application to intervene and certificate of urgency.	4.25	KPW	\$550.00	\$2,337.50
Service	04/06/2022	Drafting correspondence to Court re urgent date.	0.25	KPW	\$550.00	\$137.50
Service	04/07/2022	Drafting caveat against release and payment out. Drafting application to intervene in DNB Bank proceedings. Drafting caveat against release and payment out.	3.25	KPW	\$550.00	\$1,787.50
Service	04/08/2022	Drafting and forwarding correspondence to AM, Receipt review and consideration of reply. Telephone conference with AM	2.00	KPW	\$550.00	\$1,100.00
Service	04/11/2022	Attending hearing on application to intervene in DNB Bank proceedings. Drafting Order for leave to intervene. Drafting Notice and Memo of appearance as intervenors.	4.25	KPW	\$550.00	\$2,337.50
Service	04/12/2022	Drafting withdrawl of caveat. Attending hearing before the Court on application by the Crew. Drafting update on hearing.	2.75	KPW	\$550.00	\$1,512.50
Service	04/19/2022	Drafting update on hearing and next steps.	0.50	KPW	\$550.00	\$275.00
Expense	04/19/2022	Misc Paper Charges	1.00	NP	\$150.00	\$150.00

Time Keeper	Position	Quantity	Rate	Total	
Kenra Parris-Whittaker	Partner	38.25	\$550.00	\$21,037.50	
				Subtotal	\$21,337.50
				VAT (10.0%)	\$2,118.75
				Total	\$23,456.25
				Payment (04/19/2022)	-\$22,987.12
				Early Payment Discount	-\$469.13
				Balance Owing	\$0.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3151	06/08/2022	\$12,982.94	\$0.00	\$12,982.94
3355	07/08/2022	\$18,020.75	\$0.00	\$18,020.75

Interest On Other Invoices

Original Invoice	Due On	Amount Due	Payments Received	Balance Due
3151	07/09/2022	\$3.73	\$0.00	\$3.73
3151	08/08/2022	\$16.01	\$0.00	\$16.01
3355	08/08/2022	\$5.18	\$0.00	\$5.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3090	04/26/2022	\$23,456.25	\$23,456.25	\$0.00
			Outstanding Balance	\$31,028.61
			Amount in Trust	\$28.13
			Total Amount Outstanding	\$31,000.48

Please make all amounts payable to: ParrisWhittaker

Thank you for your business. Please make the payment on time.

Due Date/Discount Please pay this invoice by the above payment due date free of any charges or transfer costs or other costs and free of any deductions or set-off for whatever reason. If payment is made before the due date above, we will apply a 2% discount to the total invoice amount.

Payment Method Due to Covid19, please make all payments via wire transfer to ParrisWhittaker.

Swift/BIC: **NOSCBSNSFPO**

Account Name: **ParrisWhittaker**

Account Number: **7004742** Bank Name: **ScotiaBank Bahamas Ltd,**

Bank Address: **Freeport, Grand Bahama, The Bahamas**

2.0% discount will be applied if payment is received within 7 days. 1.5% simple annual interest will be charged every 30 days.

Our TIN: 100076376

PARRISWHITTAKER

INVOICE

Invoice # 3091
Date: 04/19/2022
Due On: 04/26/2022

Mark Healy, Assignee of Crystal Cruises LLC
1885 Marina Mile Blvd., Suite 103
Fort Lauderdale, FL 33315
United States

03703-Mark Healy, Assignee of Crystal Cruises LLC

Arrest M/V "Crystal Serenity"

Type	Date	Notes	Quantity	Attorney	Rate	Total
Expense	03/21/2022	Other: Filing Fee - Arrest M/V "Crystal Serenity	1.00	NP	\$50.00	\$50.00
Expense	03/21/2022	Other: Filing Fee - Arrest M/V "Crystal Serenity	1.00	NP	\$75.00	\$75.00
Service	04/19/2022	Drafting relevant documents and submissions in all intervenor matters, attending hearings, reviewing documents.	2.00	KPW	\$550.00	\$1,100.00
Expense	04/19/2022	Misc Paper Charges	1.00	NP	\$150.00	\$150.00

Time Keeper	Position	Quantity	Rate	Total
Kenra Parris-Whittaker	Partner	2.0	\$550.00	\$1,100.00
Subtotal				\$1,375.00
VAT (10.0%)				\$122.50
Total				\$1,497.50
Payment (04/19/2022)				-\$1,467.55
Early Payment Discount				-\$29.95
Balance Owing				\$0.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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3151	06/08/2022	\$12,982.94	\$0.00	\$12,982.94
3355	07/08/2022	\$18,020.75	\$0.00	\$18,020.75

Interest On Other Invoices

Original Invoice	Due On	Amount Due	Payments Received	Balance Due
3151	07/09/2022	\$3.73	\$0.00	\$3.73
3151	08/08/2022	\$16.01	\$0.00	\$16.01
3355	08/08/2022	\$5.18	\$0.00	\$5.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3091	04/26/2022	\$1,497.50	\$1,497.50	\$0.00
			Outstanding Balance	\$31,028.61
			Amount in Trust	\$28.13
			Total Amount Outstanding	\$31,000.48

Please make all amounts payable to: ParrisWhittaker

Thank you for your business. Please make the payment on time.

Due Date/Discount Please pay this invoice by the above payment due date free of any charges or transfer costs or other costs and free of any deductions or set-off for whatever reason. If payment is made before the due date above, we will apply a 2% discount to the total invoice amount.

Payment Method Due to Covid19, please make all payments via wire transfer to ParrisWhittaker.

Swift/BIC: **NOSCBSNSFPO**
 Account Name: **ParrisWhittaker**
 Account Number: **7004742** Bank Name: **ScotiaBank Bahamas Ltd,**
 Bank Address: **Freeport, Grand Bahama, The Bahamas**

2.0% discount will be applied if payment is received within 7 days. 1.5% simple annual interest will be charged every 30 days.

Our TIN: 100076376

Mark Healy, Assignee of Crystal Cruises LLC
 1885 Marina Mile Blvd., Suite 103
 Fort Lauderdale, FL 33315
 United States

03702-Mark Healy, Assignee of Crystal Cruises LLC

Arrest M/V "Crystal Symphony"

Type	Date	Notes	Quantity	Attorney	Rate	Total
Service	04/22/2022	RRC of email correspondence from KM and MH, Telephone conference with KM and MH. Telephone conferences with the AM. Drafting email for forwarding to DNB Bank Counsel.	2.25	KPW	\$550.00	\$1,237.50
Service	04/23/2022	RRC of email correspondence from MH.	0.25	KPW	\$550.00	\$137.50
Service	04/24/2022	RRC of email correspondence from MH.	0.25	KPW	\$550.00	\$137.50
Service	04/25/2022	Telephone conferences with the AM regarding draft email for DNB Bank request for Court application. Telephone conference with Attorney General office counsel to AM re next steps.	2.25	KPW	\$550.00	\$1,237.50
Service	04/26/2022	RRC of email correspondence from MH. drafting a reply to the same.	0.25	KPW	\$550.00	\$137.50
Service	04/28/2022	Telephone conference with Kent	0.25	KPW	\$550.00	\$137.50
Service	05/02/2022	RRC of email correspondence from MH with attachments.	0.75	KPW	\$550.00	\$412.50
Service	05/03/2022	Telephone conference with the AM	0.75	KPW	\$550.00	\$412.50
Service	05/04/2022	Drafting email correspondence to group re update. RRC of correspondence from MH	0.50	KPW	\$550.00	\$275.00
Service	05/06/2022	Telephone conferences with the AM. Review of documentation, request for visit to Vessels.	1.25	KPW	\$550.00	\$687.50
Service	05/07/2022	Drafting correspondence to the AM. Telephone conference with the AM.	0.75	KPW	\$550.00	\$412.50
Expense	05/10/2022	Other: Pelican Bay Hotel - Travel Arrangement Over Night Stay AM	1.00	NP	\$182.90	\$182.90
Expense	05/10/2022	Other: Ad Marshal expenses for overnight visit	1.00	NP	\$200.00	\$200.00
Service	05/10/2022	Telephone conference with MH.	0.25	KPW	\$550.00	\$137.50
Service	05/17/2022	Preparing for visit to vessel. bundling excel sheets and documents of items onboard Vessel. Telephone conference with AM re launch boat.	3.25	ST	\$200.00	\$650.00
Expense	05/17/2022	Paper costs	812.00	NP	\$0.25	\$203.00

Service	05/18/2022	Telephone conference with AM. Telephone conference with possible purchasers for inventory. Telephone conference with RSG agents. Telephone conference with Agents to the Vessel. Telephone conference with MH.	1.75	KPW	\$550.00	\$962.50
Service	05/18/2022	Receipt review of various emails. Telephone calls with ST and proposed logistical coordinators. Telephone conference with Bahamas customs.	1.25	KPW	\$550.00	\$687.50
Service	05/19/2022	Receipt review of various emails. Telephone calls with ST and proposed logistical coordinators. Telephone conference with AM.	0.50	KPW	\$550.00	\$275.00
Service	05/19/2022	Attending the Vessels.	10.00	ST	\$200.00	\$2,000.00
Service	05/20/2022	Updating files.	2.00	ST	\$200.00	\$400.00
Service	05/24/2022	Drafting Summons for AM for directions to remove cash onboard. Telephone conference with MH.	0.75	KPW	\$550.00	\$412.50
Service	05/30/2022	Receipt review and consideration of correspondence from DNB Bank. Drafting email to MH with proposals for response. Telephone conference with AM and AG's office. Amending draft Summons.	0.75	KPW	\$550.00	\$412.50
Service	05/31/2022	Drafting response to DNB Bank forwarding along with attachments.	1.25	KPW	\$550.00	\$687.50

Time Keeper	Position	Quantity	Rate	Total
Kenra Parris-Whittaker	Partner	16.0	\$550.00	\$8,800.00
Sheila Taylor	Paralegal	15.25	\$200.00	\$3,050.00
Subtotal				\$12,435.90

Interest

Type	Date	Description	Total
Interest	06/09/2022	Interest on overdue invoice #3151	\$3.73
Interest	07/09/2022	Interest on overdue invoice #3151	\$16.01

Interest Subtotal	\$19.74
Subtotal	\$12,435.90
VAT (10.0%)	\$547.04
Interest	\$19.74
Total	\$13,002.68

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3355	07/08/2022	\$18,020.75	\$0.00	\$18,020.75

Interest On Other Invoices

Original Invoice	Due On	Amount Due	Payments Received	Balance Due
3355	08/08/2022	\$5.18	\$0.00	\$5.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3151	06/08/2022	\$13,002.68	\$0.00	\$13,002.68
			Outstanding Balance	\$31,028.61
			Amount in Trust	\$28.13
			Total Amount Outstanding	\$31,000.48

Please make all amounts payable to: ParrisWhittaker

Thank you for your business. Please make the payment on time.

Due Date/Discount Please pay this invoice by the above payment due date free of any charges or transfer costs or other costs and free of any deductions or set-off for whatever reason. If payment is made before the due date above, we will apply a 2% discount to the total invoice amount.

Payment Method Due to Covid19, please make all payments via wire transfer to ParrisWhittaker.

Swift/BIC: **NOSCBSNSFPO**
 Account Name: **ParrisWhittaker**
 Account Number: **7004742** Bank Name: **ScotiaBank Bahamas Ltd,**
 Bank Address: **Freeport, Grand Bahama, The Bahamas**

2.0% discount will be applied if payment is received within 7 days. 1.5% simple annual interest will be charged every 30 days.

Our TIN: 100076376

Remittance Advice

Wire Transfer Information

Please include the invoice number 3151 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

Mark Healy, Assignee of Crystal Cruises LLC
1885 Marina Mile Blvd., Suite 103
Fort Lauderdale, FL 33315
United States

03702-Mark Healy, Assignee of Crystal Cruises LLC

Arrest M/V "Crystal Symphony"

Type	Date	Notes	Quantity	Attorney	Rate	Total
Service	04/22/2022	Telephone conferences with the AM. Drafting email for forwarding to DNB Bank Counsel.	1.75	KPW	\$550.00	\$962.50
Service	05/04/2022	Telephone conference MH.	0.25	KPW	\$550.00	\$137.50
Service	05/10/2022	Telephone conference MH	0.25	KPW	\$550.00	\$137.50
Expense	05/18/2022	Reimbursable expenses: Copy expenses	1.00	KPW	\$75.00	\$75.00
Service	06/01/2022	Drafting correspondence to the AM regarding summons for directions and supporting Affidavit. Telephone conference with Counsel for the AM. Receipt review and consideration fo correspondence from RR. Telephone conference with MH. Drafting reply to RR re consent position. Drafting consent order for review by P's Counsel. Drafting email correspondence to RR attaching draft Consent Order. Receipt review and consideration of further correspondence from RR. Drafting email to MH with update on all correspondence. Receipt, review of reply from MH.	4.00	KPW	\$550.00	\$2,200.00
Service	06/02/2022	Finalising draft summons and certificate of urgency requesting removal of goods. Drafting various emails to MH and KM re correspondence to DNB Bank. Receipt review of various replies from group re additional supporting documentation for Affidavit, including Insurance documents over goods.	3.00	KPW	\$550.00	\$1,650.00
Expense	06/03/2022	Other: Purchase of Flash Drives (5) - Exhibits Affidavit June 2, 2022	1.00	NP	\$100.00	\$100.00
Service	06/03/2022	Drafting Affidavit in support of summons requesting removal of goods.	3.25	KPW	\$550.00	\$1,787.50
Service	06/04/2022	Telephone conference with the Admiralty Marshal re the sale of the Vessels and proposed purchasers. Telephone conference with Agents for removal of goods. Drafting Submissions in support of Application for removal. Telephone conference with MH.	3.75	KPW	\$550.00	\$2,062.50
Service	06/07/2022	Drafting correspondence to RH re removal of goods and costs to be incurred if P objects to removal. Receipt, review and consideration of response from RH. Telephone conference with MH.	1.50	KPW	\$550.00	\$825.00
Service	06/08/2022	Updating Affidavit. Finalising all documents for filing and service on P	0.75	KPW	\$550.00	\$412.50

and Intervenor.

Service	06/09/2022	Telephone conference with the Court re urgent date. Drafting correspondence requesting urgent date. Receipt review and consideration of correspondence from RH. Drafting email to MH provide update and strategy going forward. Telephone conference with MH.	1.75	KPW	\$550.00	\$962.50
Service	06/10/2022	Attending hearing on application for removal. Providing update of hearing to MH. Telephone conference with MH.	2.25	KPW	\$550.00	\$1,237.50
Service	06/11/2022	Telephone conference with MH.	0.25	KPW	\$550.00	\$137.50
Service	06/12/2022	Telephone conference with AS Counsel for Vessel purchasers re undertaking. Telephone conference with MH. Preparing for hearing.	0.75	KPW	\$550.00	\$412.50
Service	06/13/2022	Drafting emails to AS. Receipt, review and consideration of correspondence from AS. Telephone conference with MH. Drafting Order of the Court for removal. Drafting correspondence to P's Counsel attaching the draft Order. Attending hearing before Judge re removal of items. Various Telephone conference with MH re update. Telephone conference with AM. Telephone conference with Agents.	5.25	KPW	\$550.00	\$2,887.50
Expense	06/17/2022	Other: Service of Summons on Delaney Partners and Alexiou, Knowles & Co. re M/V Crystal Serenity and M/V Crystal Symphony (Mark Healey, Moecker & Associates Inc.)	1.00	NP	\$90.00	\$90.00
Expense	06/17/2022	Other: Service of Order and Memorandum of Appearance on Alexiou, Knowles & Co. (Mark Healy re M/V Serenity and Symphony)	1.00	NP	\$75.00	\$75.00
Expense	07/01/2022	Copying	1,012.00	NP	\$0.25	\$253.00

Time Keeper	Position	Quantity	Rate	Total
Kenra Parris-Whittaker	Partner	28.75	\$550.00	\$15,812.50
			Subtotal	\$16,405.50

Interest

Type	Date	Description	Total
Interest	07/09/2022	Interest on overdue invoice #3355	\$5.18
		Interest Subtotal	\$5.18
		Subtotal	\$16,405.50
		VAT (10.0%)	\$1,615.25
		Interest	\$5.18
		Total	\$18,025.93

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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3151	06/08/2022	\$12,982.94	\$0.00	\$12,982.94
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Interest On Other Invoices

Original Invoice	Due On	Amount Due	Payments Received	Balance Due
3151	07/09/2022	\$3.73	\$0.00	\$3.73
3151	08/08/2022	\$16.01	\$0.00	\$16.01

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3355	07/08/2022	\$18,025.93	\$0.00	\$18,025.93
			Outstanding Balance	\$31,028.61
			Amount in Trust	\$28.13
			Total Amount Outstanding	\$31,000.48

Please make all amounts payable to: ParrisWhittaker

Thank you for your business. Please make the payment on time.

Due Date/Discount Please pay this invoice by the above payment due date free of any charges or transfer costs or other costs and free of any deductions or set-off for whatever reason. If payment is made before the due date above, we will apply a 2% discount to the total invoice amount.

Payment Method Due to Covid19, please make all payments via wire transfer to ParrisWhittaker.

Swift/BIC: **NOSCBSNSFPO**
 Account Name: **ParrisWhittaker**
 Account Number: **7004742** Bank Name: **ScotiaBank Bahamas Ltd,**
 Bank Address: **Freeport, Grand Bahama, The Bahamas**

2.0% discount will be applied if payment is received within 7 days. 1.5% simple annual interest will be charged every 30 days.

Our TIN: 100076376

Remittance Advice

Wire Transfer Information

Please include the invoice number 3355 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.

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 PARRISWHITTAKER AS BAHAMAS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD FEBRUARY 24, 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 ParrisWhittaker as Bahamas Counsel to the Assignee for the Period February 24, 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 ParrisWhittaker seeks compensation in the amount of \$49,800.00, reimbursement of expenses in the amount of \$1,753.90, and Bahamian value-added taxes (VAT) in the amount of \$4,403.54, for a total interim award of \$55,957.44, for the period of February 24, 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. ParrisWhittaker, as Bahamas counsel to the Assignee, is awarded fees in the amount of \$49,800.00, expenses in the amount of \$1,753.90, and value-added taxes (VAT) in the amount of \$4,403.54, for a total award of \$55,957.44, which represents 100% of the fees, expenses, and taxes requested in the Motion.
3. The Assignee is authorized to pay to ParrisWhittaker the sum of \$31,003.69, which is the balance owed after application of the retainer already paid by the Assignee to ParrisWhittaker. ParrisWhittaker is authorized to apply the \$28.13 balance of its retainer.
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 ParrisWhittaker 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