

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.

**FINAL MOTION FOR APPROVAL AND PAYMENT OF FEES INCURRED BY
PHELPS DUNBAR, LLP AS SPECIAL COUNSEL TO THE ASSIGNEE FOR
THE PERIOD OF AUGUST 1, 2022 THROUGH OCTOBER 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 Clerk of 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 final fees in the amount of \$13,016.00 incurred by Phelps Dunbar, LLP (“Phelps”) in connection with its representation of the Assignee during the period of August 1, 2022 through October 31, 2022 (the “Application Period”). In support of the Motion, the Assignee states:

1. On February 10, 2022, the Assignors executed and delivered, and the Assignee accepted, irrevocable assignments for the benefit of creditors to the Assignee (collectively, the “Assignments”). On February 11, 2022 (the “Petition Date”), a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for each of the Assignors, thereby commencing the following assignment for the benefit of creditors cases pursuant to Section 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01, *In re Crystal Holdings U.S. LLC*, Case No. 2022-002757-CA-01, and *In re Crystal Aircruises LLC*, Case No. 2022-002758-CA-01 (collectively, the “Assignment Cases”). On March 3, 2022, the Court entered orders in each of the Assignment Cases consolidating and jointly administering the Assignment Cases for procedural purposes.

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

3. Pursuant to Florida Statute § 727.108(7), the Assignee retained Phelps 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. On August 19, 2022, the Assignee filed a *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* (the “Phelps First Fee Motion”). The Phelps First Fee Motion, requesting compensation in the amount of \$77,590.00 and expenses in the amount of \$780.85, was granted, after notice and hearing, on September 22, 2022.

6. During the Application Period, Phelps continued to coordinate responses to various legal actions concerning maritime law in Florida, Texas, the Bahamas, and Gibraltar, and assisted the Assignee in concluding all such actions on terms favorable to the Assignment Estate. In the Texas actions, Phelps negotiated a resolution with Peninsula Petroleum whereby a sizeable portion of the funds that had been seized by Peninsula Petroleum was returned to the assignment estate of Crystal Cruises LLC (the “Assignment Estate”), and Phelps finalized all associated pleadings and obtained dismissal of the actions. Phelps also continued to coordinate with 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 and assisted the Assignee in finalizing the sales of assets of the Assignment Estate on board the vessels in the Bahamas and Gibraltar. Phelps does not anticipate any further work on this matter.

7. As of October 31, 2022, the current cash balance in the Assignment Estate is \$13,095,671.18 (the “Estate Funds”).

8. Phelps, as special counsel to the Assignee, has incurred fees in the amount of \$13,016.00 for legal services provided to the Assignee during the Application Period as identified in the chart below. Phelps' 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/Hour	Total
Kent Morrison	4.10	\$400	\$1,640.00
Jason Pill	.40	\$390	\$156.00
Jeremy Grabill	9.60	\$350	\$3,360.00
Marc Matthews	.50	\$330	\$165.00
Arthur Kraatz	25.50	\$290	\$7,395.00
Dawn A. Bebell	1.20	\$250	\$300.00
TOTALS	41.30		\$13,016.00

9. The Assignee respectfully requests that the Court approve this Motion and allow Phelps a final award of fees in the amount of \$13,016.00 for the period of August 1, 2022 through October 31, 2022.

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 \$13,016.00 in compensation for services rendered by Phelps; and (iii) authorizing the Assignee to pay Phelps \$13,016.00; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: November 17, 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
 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 November 17, 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)



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

September 19, 2022
Invoice Number: 1263410

REMITTANCE ADVICE

Description Of Matter: General Admiralty Advice

Our File Number: 40342-0001

Total For Invoice Dated September 19, 2022:

Total Fees	\$	12,690.00
Total Of Invoice	\$	12,690.00

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: 707716080
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

September 19, 2022
Invoice Number: 1263410

For Professional Services Rendered Through August 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>
08/01/22	A. Kraatz	Drafting insert for court application regarding scope of work to date	0.30	87.00
08/01/22	A. Kraatz	Report to client regarding status of settlement discussions	0.20	58.00
08/05/22	K. Morrison	Study and review of assignment and consider impact of same on claim and settlement position	0.80	320.00
08/05/22	J. Grabill	Reviewed email from Peninsula's counsel demanding discovery responses and producing assignment agreement; analyzed assignment agreement impacting same	0.50	175.00
08/05/22	J. Grabill	Reviewed ruling by Northern District of Texas recommending denial of Crystal Cruise's motion to vacate Rule B attachment and follow-up communications re: same	0.30	105.00
08/05/22	A. Kraatz	Receipt and review of KfW assignment from Plaintiff's counsel, analysis regarding possible settlement of case in light of	0.90	261.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
Page Number 2

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		assignment, and report to client regarding same		
08/08/22	A. Kraatz	Receipt and review of report and recommendation on motion to vacate Rule B attachment and correspondence with client regarding same	0.80	232.00
08/09/22	J. Grabill	Strategic considerations based on settlement communications from Peninsula's counsel	0.20	70.00
08/09/22	J. Grabill	Legal research re: [REDACTED]	0.90	315.00
08/09/22	A. Kraatz	Correspondence with Mr. Healy regarding possible settlement	0.40	116.00
08/10/22	K. Morrison	Telephone conference with client concerning current case status, future handling and recommendations for settlement; coordinating discussions with opposing counsel; receipt and review of correspondence with opposing counsel	0.70	280.00
08/10/22	J. Grabill	Reviewed follow-up email communications with Peninsula's counsel re: settlement and evaluate next steps	0.30	105.00
08/10/22	A. Kraatz	Conferences with client and Mr. Simms regarding settlement and correspondence with Mr. Simms regarding settlement and his threatened motion to compel	1.90	551.00
08/11/22	K. Morrison	Negotiating resolution of Rule B attachment	0.70	280.00
08/11/22	M. Matthews	Strategize regarding settlement negotiations and handling the threatened motion for sanctions	0.30	99.00
08/11/22	J. Grabill	Reviewed new settlement offer from Peninsula's counsel and analyzed strategy in response to same; multiple calls re: settlement	0.60	210.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		strategy		
08/11/22	J. Grabill	Began drafting motion for extension of time to respond to Peninsula's discovery requests	1.00	350.00
08/11/22	A. Kraatz	Correspondences and conferences with client and Mr. Simms regarding settlement	2.20	638.00
08/12/22	J. Grabill	Reviewed email from Peninsula's counsel terminating settlement negotiations and demanding discovery responses today and multiple communications re: how to respond to same; continued drafting motion for extension of time to respond to Peninsula's discovery requests and strategize regarding next steps	2.20	770.00
08/12/22	A. Kraatz	Conferences and correspondence with client and Mr. Simms regarding possible settlement; drafting correspondence to the Court regarding same	2.40	696.00
08/15/22	J. Grabill	Reviewed Peninsula's inserts for joint letter to magistrate judge re: discovery issues and evaluate response to same	0.40	140.00
08/15/22	J. Grabill	Reviewed and revised draft email update to client	0.20	70.00
08/15/22	A. Kraatz	Report to client and correspondence with Mr. Simms regarding letter to court	0.60	174.00
08/16/22	M. Matthews	Receive and consider joint letter to the court regarding discovery dispute	0.10	33.00
08/16/22	A. Kraatz	Revisions to joint letter to Court requesting discovery conference for filing today	0.70	203.00
08/16/22	A. Kraatz	Conferences with client and Mr. Simms regarding possible settlement	1.20	348.00
08/17/22	J. Grabill	Reviewed draft consent judgments	0.50	175.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
Page Number 4

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		and motions to disburse funds circulated by Peninsula's counsel		
08/17/22	J. Grabill	Reviewed settlement emails from Peninsula's counsel and consider steps to finalize settlement terms	0.30	105.00
08/17/22	A. Kraatz	Correspondence with Mr. Simms regarding settlement; correspondence and conferences with Mr. Simms, Bank of America's counsel, MUFG's counsel, and client regarding consent motions for entry of judgment in light of same	2.40	696.00
08/18/22	K. Morrison	Reviewing proposed terms of resolution of Rule B attachment	0.40	160.00
08/18/22	A. Kraatz	Reviewed and revised draft motions for entry of consent judgment and to disburse garnishment proceeds in two Texas attachment cases	1.40	406.00
08/19/22	J. Grabill	Attention to follow-up email communications between Peninsula and banks re: finalizing terms of settlement	0.20	70.00
08/22/22	J. Grabill	Reviewed order from Northern District of Texas adopting magistrate judge's recommendation re: motion to vacate Rule B attachment	0.10	35.00
08/22/22	A. Kraatz	Correspondences with counsel regarding finalization of consent judgment and associated pleadings	0.40	116.00
08/23/22	K. Morrison	Receipt and review of information relative to potential intervention by assignee of invoices, consider potential strategic options in response to same	0.90	360.00
08/23/22	J. Grabill	Strategize re: KfW's threatened intervention in Texas actions and reviewed email from KfW re: same; analyzed strategy for Peninsula settlement in light of	1.00	350.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		KfW threat and follow-up communications re: same		
08/23/22	A. Kraatz	Telephone conference with counsel for KfW regarding its purported claim to attached funds	0.80	232.00
08/23/22	A. Kraatz	Analysis regarding merits of KfW's purported claim to attached funds and possible procedural issues associated with proposed intervention	2.20	638.00
08/23/22	A. Kraatz	Conferences with client and Miami counsel regarding KfW's request to intervene in attachment proceedings and possible options with respect to same	1.30	377.00
08/23/22	A. Kraatz	Conference with BoA's counsel regarding expediting consent judgment filing	0.40	116.00
08/24/22	J. Grabill	Reviewed final drafts of consent judgments and motions to disburse funds in Texas actions and provided comments re: same; attention to email communications from Peninsula's counsel re: draft pleadings	0.40	140.00
08/24/22	A. Kraatz	Conferences and correspondences with Peninsula's counsel, Bank of America's counsel, and client regarding finalization of settlement	2.20	638.00
08/24/22	D. Bebell	Review the Court's Order approving the Findings and Recommendations of the Magistrate Judge and denying the Motion to Vacate.	0.10	25.00
08/25/22	K. Morrison	Study and review of proposed terms of settlement/release	0.60	240.00
08/25/22	M. Matthews	Receive and review Motion for Entry of CONsent Judgment and Order entered by the Southern District of Texas	0.10	33.00
08/25/22	J. Grabill	Reviewed email communications re: finalizing consent judgments	0.30	105.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		and associated motions and re: KFW's threat to intervene; communications re: same		
08/25/22	A. Kraatz	Finalized motions for entry of consent judgment and disbursement of attachment proceeds; correspondence and conference with MUFG's counsel regarding wiring of funds to client; correspondence with client regarding same	1.80	522.00
08/26/22	D. Bebell	Receive and review the following documents filed in the Northern District of Texas case: (i) Agreed Motion for Consent Judgment, (ii) Agreed Motion to Disburse Garnished Funds, (iii) Notice of Dismissal Star Cruises (HK) Limited. Receive and review the following documents filed in the Southern District of Texas case: (i) Agreed Motion for Consent Judgment, (ii) Agreed Motion to Disburse Garnished Funds, (iii) Consent Judgment, (iii) Order Granting Agreed Motion to Disburse Garnished Funds, and (iv) Unopposed Motion to Dismiss - Star Cruises (HK) Limited.	0.60	150.00
08/30/22	J. Grabill	Analyzed options for expediting MUFG wire payment; reviewed emails to MUFG re: status of wire payment	0.20	70.00
08/30/22	A. Kraatz	Correspondence with MUFG regarding status of wire transfer	0.20	58.00
08/30/22	D. Bebell	Receive and review the following documents: (i) the Court's Order granting the Motion for Consent Judgment, (ii) the Consent Judgment, (iii) Agreed Order to Disburse Funds, and (iv) the Court's electronic Order closing the case in the Northern District of Texas.	0.30	75.00



Our File Number: 40342-0001
Invoice Number: 1263410

September 19, 2022
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/31/22	A. Kraatz	Correspondences with client and MUFG regarding wire transfer of funds pursuant to disbursement order	0.30	87.00
08/31/22	D. Bebell	Receive and review the Notice of Satisfaction of Consent Judgment in the SDTX case.	0.10	25.00
TOTAL FEES				\$ 12,690.00

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Grabill	9.60	350.00	3,360.00
K. Morrison	4.10	400.00	1,640.00
M. Matthews	0.50	330.00	165.00
A. Kraatz	25.00	290.00	7,250.00
D. Bebell	1.10	250.00	275.00
Totals	40.30		\$ 12,690.00

TOTAL FEES AND DISBURSEMENTS \$ 12,690.00

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

October 6, 2022
Invoice Number: 1266482

REMITTANCE ADVICE

Description Of Matter: General Admiralty Advice

Our File Number: 40342-0001

Total For Invoice Dated October 6, 2022:

Total Fees	\$	326.00
Total Of Invoice	\$	326.00

Other Outstanding Invoices For This Matter As Of October 6, 2022:

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Balance</u>
09/19/22	1263410	12,690.00
TOTAL DUE FOR THIS MATTER		\$ 13,016.00

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: 707716080
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

October 6, 2022
Invoice Number: 1266482

For Professional Services Rendered Through September 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>
09/19/22	J. Pill	Address case closure matters and issues, including correspondence with Mark Healy regarding same	0.40	156.00
09/22/22	A. Kraatz	Attendance at hearing on fee application in Florida ABC proceeding	0.50	145.00
09/26/22	D. Bebell	Receive and review the Notice of Satisfaction of Judgment in the Northern District of Texas case.	0.10	25.00
TOTAL FEES			\$	326.00



Our File Number: 40342-0001
Invoice Number: 1266482

October 6, 2022
Page Number 2

Summary By Timekeeper

<u>Timekeeper</u>	<u>Hours</u>	<u>Billed Per Hour</u>	<u>Billed Amount</u>
J. Pill	0.40	390.00	156.00
A. Kraatz	0.50	290.00	145.00
D. Bebell	0.10	250.00	25.00
Totals	1.00		\$ 326.00

TOTAL FEES AND DISBURSEMENTS \$ 326.00

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 FINAL 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 AUGUST 1, 2022 THROUGH OCTOBER 31, 2022**

THIS CAUSE came before the Court upon the *Final 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 August 1, 2022 Through October 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 final compensation in the amount of \$13,016.00 for the period of August 1, 2022 through October 31, 2022. The Court, having considered the Motion and the record in this proceeding, 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 final fees in the amount of \$13,016.00, 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 \$13,016.00.

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.

HONORABLE ALAN FINE
Circuit Court Judge

Copies furnished to:

Counsel of record