

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

To: Assignors,

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

**MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF  
EXPENSES INCURRED BY ASTREA CVBA AS SPECIAL COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD OF DECEMBER 3, 2021 THROUGH MAY 29, 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 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, Michael A. Nardella, Esq. and Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Blvd., Ste. 300, Orlando, FL 32801, 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 €6.700,86 and reimbursement of expenses in the amount of €536,07 for a total award of €7.236,93 incurred by Astrea CVBA in connection with its representation of the Assignee during the period of December 3, 2021 through May 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 Astrea CVBA as his special counsel to perform necessary legal services in connection with the Assignee's substitution in place of the Assignor, as party plaintiff in a claim of the Assignor that was pending before the Belgian maritime court at the time of the Assignment (the "Belgium Claim").

4. On May 16, 2022, the Court entered an order approving the employment of Astrea CVBA as special counsel to the Assignee.

5. During the Application Period Astrea CVBA, as special counsel to the Assignee, has continued its prosecution of the Belgium Claim, which matter remains pending in the Belgium Maritime Court.

6. As of January 9, 2023, the current cash balance in the estate is approximately \$13,008,511.54 (the "Estate Funds").

7. During the Application Period Astrea CVBA has incurred fees in the amount of €6.700,86 for legal services provided to the Assignee during the Application Period and expenses in the amount of €536,07 in the nature of office expenses. Applicant's invoices are attached hereto as **Exhibit "A"**.

8. The Assignee respectfully requests that the Court approve this Motion and allow Astrea CVBA an interim award of fees in the amount of €6.700,86, and reimbursement of expenses in the amount of €536,07, for a total of €7.236,93 for the period of December 3, 2021 through May 29, 2022, with proper adjustment for the pending foreign exchange rate upon payment.

9. There will be no prejudice to any party in respect of the requested interim award and distribution as it is being made for the purpose of administering, and 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 €6.700,86 in compensation for services rendered by Astrea CVBA, and reimbursement of expenses incurred by Astrea CVBA in the amount of €536,07, for a total award of €7.236,93, (iii) authorizing the Assignee to pay Astrea CVBA €7.236,93, with proper adjustment for the pending foreign exchange rate; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: January 13, 2023

NARDELLA & NARDELLA, PLLC  
*Co-General Counsel for Assignee*  
135 W. Central Blvd., Ste. 300  
Orlando, FL 32801  
(407) 966-2680

By: /s/ Paul N. Mascia  
Michael A. Nardella, Esq.  
Florida Bar No. 051265  
Paul N. Mascia, Esq.  
Florida Bar No. 0489670  
[mnardella@nardellalaw.com](mailto:mnardella@nardellalaw.com)  
[pmascia@nardellalaw.com](mailto:pmascia@nardellalaw.com)  
[kcooper@nardellalaw.com](mailto:kcooper@nardellalaw.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 January 13, 2023 to all parties that have entered an appearance in this case; 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/ Paul N. Mascia  
Paul N. Mascia

**EXHIBIT A**  
**(Invoices)**



**Crystal Cruises LLC**  
**f.a.o. Jessica Hoppe**  
**1501 Biscayne Blvd**  
**FL 33132 Miami**  
**United States of America**

BY MAIL: jhoppe@crystalcruises.com; MarineAP@CrystalCruises.com

Sent on 17th of January 2022

Our reference : 18-01045-CMM\MVL\MVL-  
Your reference : -  
Invoice n° : 2175115  
Invoice date : 31/12/2021

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to 31/12/2021:

	Excl VAT	VAT	Total
Fees	€ 422,08	€ 0,00	€ 422,08
Office expenses	€ 33,77	€ 0,00	€ 33,77
	€ 455,85	€ 0,00	<b>€ 455,85</b>

You only have to pay 15.50% of this invoice ( in this case **70,66 eur**).

VAT 0 %  
VAT exempt - article 44 Directive 2006/112/EC

May we kindly ask you to transfer the above amount into our account with number **IBAN: BE25 3630 0755 0882 - BIC: BBRUBEBB mentioning the following reference: +++202/3175/11540+++**

**Our invoices are payable within 7 days after receipt.**

VATnumber: 0885.184.584

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Correspondence address: Antwerpen

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COMPTE HONORAIRES/  
BANK ACCOUNT:  
IBAN: BE25 3630 0755 0882  
BIC/SWIFT: BBRUBEBB

DERDENREKENING/  
COMPTE TIERS/  
THIRD PARTY ACCOUNT:  
IBAN: BE64 3200 7054 6357  
BIC/SWIFT: BBRUBEBB

**FEES**

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<b>Date</b>	<b>Comment</b>
03/12/2021	Discussion with Ruud re input client
11/12/2021	Check additional information from clients re bookings sample; e-mail to clients
28/12/2021	Follow-up and preparation of submissions to compound interest







**Crystal Cruises LLC**  
**f.a.o. Jessica Hoppe**  
**1501 Biscayne Blvd**  
**FL 33132 Miami**  
**United States of America**

BY MAIL: jhoppe@crystalcruises.com; MarineAP@CrystalCruises.com

Sent on 21st of February 2022

Our reference : 18-01045-CMM\MVL\MVL-  
Your reference : -  
Invoice n° : 2270211  
Invoice date : 31/01/2022

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to 31/01/2022:

	<b>Excl VAT</b>	<b>VAT</b>	<b>Total</b>
Fees	€ 1.235,43	€ 0,00	€ 1.235,43
Office expenses	€ 98,83	€ 0,00	€ 98,83
	€ 1.334,26	€ 0,00	<b>€ 1.334,26</b>

You only have to pay 84,50% of this invoice ( in this case **1040 eur**).

VAT 0 %  
VAT exempt - article 44 Directive 2006/112/EC

May we kindly ask you to transfer the above amount into our account with number **IBAN: BE25 3630 0755 0882 - BIC: BBRUBEBB** *mentioning the following reference: +++202/4270/21106+++*

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Correspondence address: Antwerpen

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BIC/SWIFT: BBRUBEBB

DERDENREKENING/  
COMPTE TIERS/  
THIRD PARTY ACCOUNT:  
IBAN: BE64 3200 7054 6352  
BIC/SWIFT: BBRUBEBB

**FEES**

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<b>Date</b>	<b>Comment</b>
05/01/2022	Reminder to clients
14/01/2022	Correspondence
17/01/2022	Analysis of further documentation from Crystal Cruises; e-mail to court surveyor; e-mail to Henry de los Reyes
19/01/2022	Adjustments e-mail to court surveyor
20/01/2022	Draft submissions capitalization of interests - part I
21/01/2022	Draft submissions capitalization of interests - part II
23/01/2022	Mail to colleague and court surveyor, clarification re figures
27/01/2022	Further amendment of submission; internal e-mail
31/01/2022	Adjustment to capitalization submissions
31/01/2022	Correspondence





**Crystal Cruises LLC**  
**f.a.o. Jessica Hoppe**  
**1501 Biscayne Blvd**  
**FL 33132 Miami**  
**United States of America**

BY MAIL: jhoppe@crystalcruises.com; MarineAP@CrystalCruises.com

Sent on 14th of March 2022

Our reference : 18-01045-CMM\MVL\MVL-  
Your reference : -  
Invoice n° : 2270523  
Invoice date : 28/02/2022

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to 28/02/2022:

	Excl VAT	VAT	Total
Fees	€ 917,51	€ 0,00	€ 917,51
Office expenses	€ 73,40	€ 0,00	€ 73,40
	€ 990,91	€ 0,00	<b>€ 990,91</b>

You only have to pay **84,50 %** of this invoice. For this invoice it makes : **837,32 eur.**

VAT 0 %  
VAT exempt - article 44 Directive 2006/112/EC

May we kindly ask you to transfer the above amount into our account with number **IBAN: BE25 3630 0755 0882 - BIC: BBRUBEBB mentioning the following reference: +++202/4270/52327+++**

**Our invoices are payable within 7 days after receipt.**

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Correspondence address: Antwerpen

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**FEES**

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<b>Date</b>	<b>Comment</b>
01/02/2022	Follow-up correspondence
01/02/2022	Follow up re submissions compound interest
16/02/2022	Draft e-mail to Ulrich Krämer re Crystal Cruises' status
17/02/2022	E-mail to Crystal Cruises' receiver's counsel
17/02/2022	Discussion with opponent
18/02/2022	Follow-up correspondence
22/02/2022	Conf call with Paul Mascia + debriefing re next steps
22/02/2022	Call with Florida receiver's counsel
22/02/2022	Update to e-mail to Ulrich Krämer
22/02/2022	Mail to Ulrich Kraemer following conf call wit Paul Mascia
25/02/2022	Mail to client



**Mr. Mark C. HEALY**

**In his capacity of assignee for the Benefit of Crystal Cruises LLC**

**Michael Moecker & Associates Inc.  
De Heer Mr. Paul Mascia  
1883 Marina Mile Blvd., Suite 106  
FL 33315 Fort Lauderdale - Florida  
United States of America**

BY MAIL: pmascia@nardellalaw.com

Sent on 21st of June 2022

Our reference : 18-01045-CMM\MVL\MVL-  
Your reference : -  
Invoice n° : 2272068  
Invoice date : 21/06/2022

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to 31/05/2022:

	Excl VAT	VAT	Total
Fees	€ 4.125,84	€ 0,00	€ 4.125,84
Office expenses	€ 330,07	€ 0,00	€ 330,07
	€ 4.455,91	€ 0,00	<b>€ 4.455,91</b>

**You only have to pay 84,50 % of this invoice (In this case 3765,44 €).**

VAT 0 %  
VAT exempt - article 44 Directive 2006/112/EC

May we kindly ask you to transfer the above amount into our account with number **IBAN: BE25 3630 0755 0882 - BIC: BBRUBEBB mentioning the following reference: +++202/4272/06820+++**

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**FEES**

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<b>Date</b>	<b>Comment</b>
02/03/2022	Review submissions
08/03/2022	Follow-up re Paul Mascia's e-mail; e-mail Ulrich Krämer
08/03/2022	Telcon with Ulrich Krämer
08/03/2022	Telcon with Herman Firgau (Hull Underwriters)
08/03/2022	Internal discussion; e-mail
08/03/2022	E-mail to Ulrich Krämer
08/03/2022	Followup on email from Ulrich Krämer; check assignment documents
08/03/2022	Follow-up correspondence
08/03/2022	Preparation conf call
08/03/2022	Conf call with hull and machinery
08/03/2022	Mail to client re support
09/03/2022	E-mail to Paul Mascia
09/03/2022	Review email to Paul Mascia
10/03/2022	Mail to court surveyor
11/03/2022	Mail to client
11/03/2022	Follow-up correspondence from court surveyor re exhibits
11/03/2022	Email Assignee
11/03/2022	Draft e-mail to Nautical Surveyor regarding refund amounts
11/03/2022	E-mail to Paul Mascia
14/03/2022	Brief telcon
15/03/2022	Mail to Nautical Commission: remarks re individual lines and damages paid
15/03/2022	Mail to colleague
15/03/2022	Mail to colleague
15/03/2022	Mail to colleague
18/03/2022	Status of matter re call 22/03
22/03/2022	Zoom call with Paul Mascia
22/03/2022	Preparation conf call
22/03/2022	Conf call with Paul Mascia: dealing with various questions on behalf of assignee
22/03/2022	Check status of matter, draft e-mail to Paul Mascia with fee estimate
25/03/2022	Email to Paul Mascia re next steps
25/03/2022	Email to Paul Mascia re next steps
25/03/2022	Mail to client Mr Mascia
11/04/2022	E-mail to Paul Mascia
11/04/2022	Email to Paul Mascia
25/04/2022	Email to principal
26/04/2022	E-mail Paul Mascia
27/04/2022	Correspondence
27/04/2022	Internal briefing
27/04/2022	E-mail Paul Mascia
27/04/2022	Mail to client; answering questions raised
03/05/2022	Mail to client
27/05/2022	Status of matter; e-mail to Paul Mascia
27/05/2022	Status; draft e-mail to court surveyor
29/05/2022	Mail to adverse party and to Nautical Commission



**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  
ASTREA CVBA AS SPECIAL COUNSEL TO THE ASSIGNEE  
FOR THE PERIOD OF DECEMBER 3, 2021 THROUGH MAY 29, 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 Astrea CVBA as Special Counsel to the Assignee for the Period of December 3, 2021 through May 29, 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 Astrea CVBA seeks compensation in the amount of €6.700,86 and reimbursement of expenses in the amount of €536,07, for a total interim award of €7.236,93, for the period of December 3, 2021 through May 29, 2022, with proper adjustment for the pending foreign exchange rate. 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 hereby **GRANTED**.
2. Astrea CVBA, as special counsel to the Assignee, is awarded fees in the amount of €6.700,86 and expenses in the amount of €536,07, for a total award of €7.236,93, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Astrea CVBA the sum of €7.236,93, which is the balance owed, with proper adjustment for the pending foreign exchange rate.
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 Astrea CVBA for the benefit of the assignment estate.

**DONE AND ORDERED** in Chambers, at Miami-Dade County, Florida on this \_\_\_ day of \_\_\_\_\_, 2023.

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HONORABLE ALAN FINE  
Circuit Court Judge

Copies furnished to:

Counsel of record