

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 INCURRED  
BY KENNEDYS CHUDLEIGH LTD. AS BERMUDA COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD OF AUGUST 1, 2022 THROUGH DECEMBER 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 fees in the amount of \$3,914.50 and reimbursement of expenses in the amount of \$92.00 for a total award of \$4,006.50 incurred by Kennedys Chudleigh Ltd. (“Kennedys”) in connection with its representation of the Assignee during the period of August 1, 2022 through December 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 Kennedys as Bermuda counsel to perform necessary legal services in connection with the pending related insolvency proceeding in Bermuda entitled *In the Matter of Genting Hong Kong Limited (Joint Personal Liquidators)*; Supreme Court of Bermuda, Civil Jurisdiction No. 11 of 2022 (the “Bermuda Proceedings”). Genting Hong Kong Limited is the indirect parent company of the Assignors.

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

5. During the Application Period, Kennedys provided counsel to the Assignee in connection with Bermuda insolvency law and practices, including in connection with the pending Genting Hong Kong Limited insolvency proceeding in Bermuda and analysis of third party claims in connection with Bermuda law.

6. As of January 9, 2023, the current cash balance in the estates is \$13,008,511.74 (the “Estate Funds”).

7. Kennedys, as Bermuda counsel to the Assignee, has incurred fees in the amount of \$3,914.50 and expenses in the amount of \$92.00 for legal services provided to the Assignee during the Application Period as identified in the chart below. Kennedys’ 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>
Erik Penz	4.10	\$525.00	\$2,152.50
Nicholas Miles	1.90	\$780.00	\$1,482.00
David Thom	.70	\$400.00	\$280.00
<b>TOTALS</b>	<b>6.70</b>		<b>\$3,914.50</b>

**SUMMARY OF EXPENSES INCURRED**

<b>Type of Expense</b>	<b>Amount of Expense</b>
Printing/Photocopying	\$92.00
<b>Total Expenses</b>	<b>\$92.00</b>

8. The Assignee respectfully requests that the Court approve this Motion and allow Kennedys an award of fees in the amount of \$3,914.50 and expenses in the amount of \$92.00 for the period of August 1, 2022 through December 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 \$4,006.50 in compensation for services rendered by Kennedys, (iii) authorizing the Assignee to pay Kennedys \$4,006.50; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: January 13, 2023

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](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 January 13, 2023 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)**

# Kennedys

20 Brunswick Street  
Hamilton,  
HM 10 Bermuda  
T +1 441 296 9276  
F +1 441 296 9277  
www.kennedyslaw.com

Invoice Date : 13/01/2023

Invoice Number : 31-23-0000013/1/BMMAR108

Client Ref : GENTING/MARK HEALY/CRYSTAL

Our Ref : BMM114/1074578/NNM

MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE  
FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES  
LLC, ET AL.  
C/O BERGER SINGERMAN LLP  
1450 BRICKELL AVENUE, SUITE 1900  
MIAMI  
33131

For the Attention of : SAMUEL CAPUANO  
RE : IN THE MATTER OF GENTING HONG KONG LIMITED (JOINT PROVISIONAL LIQUIDATORS  
APPOINTED)(FOR RESTRUCTURING PURPOSES ONLY)  
Note : INTERIM ACCOUNT: 04/08/22 to 22/11/22

Item	Value of Services	USD
Professional Charges		1,814.50
Other Service Items		92.00
	Total	1,906.50

Your Proportion = 100.00%

1,906.50

With Compliments

## Kennedys Chudleigh Ltd

### REMITTANCE SLIP

If paying by bank transfer please quote the Invoice Number below and remit to:-

Bank: HSBC Bermuda  
6 Front Street, Hamilton, HM11 Bermuda  
Account Name: Kennedys Chudleigh Ltd  
Account Number: [REDACTED]

Swift Code: BBDABMHM

If paying by cheque please return the slip below with your remittance to Kennedys Chudleigh Ltd, P.O Box HM 2945, Hamilton HM-MX, Bermuda.

Our Ref : BMM114/1074578/NNM

Invoice No: 31-23-0000013/1/BMMAR108

Amount Payable USD 1,906.50

FROM: MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES LLC, ET AL.

FILE NUMBER: 1074578

# Kennedys

Invoice Number : 31-23-0000013/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Date: 13/01/2023

USD

Professional Charges	1,814.50
Printing/Photocopying	92.00
Unspecified	0.00

Total 1,906.50

## PROFESSIONAL CHARGES - TIMEKEEPER SUMMARY

Timekeeper	Time	Rate	Included Value	Write Off Value	Total Fees
DAVID THOM	00:42	400.00	280.00	0.00	280.00
ERIK PENZ	00:06	525.00	52.50	0.00	52.50
NICHOLAS MILES	01:54	780.00	1,482.00	0.00	1,482.00
Total					<u>1,814.50</u>

Although this invoice may include time value for attorneys and other fee-earners affiliated with Kennedys Chudleigh Ltd.'s associated law firms, including Kennedys Law LLP, such fee-earners are not employees or consultants of Kennedys Chudleigh Ltd. and are not practising Bermuda law unless admitted to the Bermuda Bar or registered as an associate under the Bermuda Bar Act 1974 and in compliance with all applicable Bermuda laws and regulations. Kennedys Chudleigh Ltd. is a limited liability company incorporated in Bermuda and approved and recognised under the Bermuda Bar (Professional Companies) Rules 2009. "Partner" is a title referring to a director or an employee of the company. A list of such persons can be obtained upon request. Associated with Kennedys Law LLP [www.kennedyslaw.com](http://www.kennedyslaw.com).



# Kennedys

Invoice Number : 31-23-0000013/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeepe	Date	Time	Time Cost	Time Not Charged	Time Billed	Activity
NNM	04-Aug-22	00:18	234.00	0.00	234.00	REVIEWING FILE ANALYSE CONSIDER
NNM	05-Aug-22	00:12	156.00	0.00	156.00	DRAFTING
EP3	11-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
NNM	22-Sep-22	00:30	390.00	0.00	390.00	ATTENDANCE
NNM	03-Oct-22	00:06	78.00	0.00	78.00	EMAIL OUT
NNM	07-Oct-22	00:12	156.00	0.00	156.00	ATTENDANCE
DAT	07-Oct-22	00:12	80.00	0.00	80.00	DRAFTING
DAT	07-Oct-22	00:06	40.00	0.00	40.00	PERUSAL
DAT	07-Oct-22	00:06	40.00	0.00	40.00	TRAVEL
DAT	07-Oct-22	00:12	80.00	0.00	80.00	TRAVEL
DAT	07-Oct-22	00:06	40.00	0.00	40.00	TRAVEL
NNM	18-Oct-22	00:06	78.00	0.00	78.00	EMAIL OUT
NNM	22-Nov-22	00:30	390.00	0.00	390.00	TELEPHONE

DAVID THOM	00:42	280.00	0.00	280.00
ERIK PENZ	00:06	52.50	0.00	52.50
NICHOLAS MILES	01:54	1,482.00	0.00	1,482.00
<b>SUB TOTAL</b>	<b>02:42</b>	<b>1,814.50</b>	<b>0.00</b>	<b>1,814.50</b>

# Kennedys

Invoice Number : 31-23-0000013/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

## Billing Narrative

Timekeeper	Date	Notes/Activity	Time	Value
DAT	07-Oct-22	Email to Nick Miles summarising Court hearing	00 Hours 12 Minutes	80.00
DAT	07-Oct-22	Discussion with Nick Miles ahead of attending Court to observe hearing	00 Hours 06 Minutes	40.00
DAT	07-Oct-22	Travel to Court	00 Hours 06 Minutes	40.00
DAT	07-Oct-22	Travel from Court	00 Hours 12 Minutes	80.00
DAT	07-Oct-22	At Court observing hearing	00 Hours 06 Minutes	40.00
		<b>Total Time for Fee Earner - DAT</b>	<b>00 Hours 42 Minutes</b>	<b>280.00</b>
EP3	11-Aug-22	Follow up on pending scheduling of call with client's D&O lawyers.	00 Hours 06 Minutes	52.50
		<b>Total Time for Fee Earner - EP3</b>	<b>00 Hours 06 Minutes</b>	<b>52.50</b>
NNM	04-Aug-22	Discuss email queries from Sam Capuano re D&O and other issues	00 Hours 18 Minutes	234.00
NNM	05-Aug-22	Preparing initial documents for fee application in Florida	00 Hours 12 Minutes	156.00
NNM	22-Sep-22	Fees hearing	00 Hours 30 Minutes	390.00
NNM	03-Oct-22	Check court schedule, email client re hearing on 7 October; discuss with D Thom	00 Hours 06 Minutes	78.00
NNM	07-Oct-22	Discuss background and hearing with D Thom; prepare short email to client update	00 Hours 12 Minutes	156.00
NNM	18-Oct-22	Email client re monitor proceedings and liquidator powers vis a vis directors	00 Hours 06 Minutes	78.00
NNM	22-Nov-22	Tel with Dain re D&O theories of liability	00 Hours 30 Minutes	390.00
		<b>Total Time for Fee Earner - NNM</b>	<b>01 Hours 54 Minutes</b>	<b>1,482.00</b>

# Kennedys

20 Brunswick Street  
Hamilton,  
HM 10 Bermuda  
T +1 441 296 9276  
F +1 441 296 9277  
www.kennedyslaw.com

Invoice Date : 13/01/2023

Invoice Number : 31-23-000014/1/BMMAR108

Client Ref : GENTING/MARK HEALY/CRYSTAL

Our Ref : BMM114/1074578/NNM

MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE  
FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES  
LLC, ET AL.  
C/O BERGER SINGERMANN LLP  
1450 BRICKELL AVENUE, SUITE 1900  
MIAMI  
33131

For the Attention of : SAMUEL CAPUANO  
RE : IN THE MATTER OF GENTING HONG KONG LIMITED (JOINT PROVISIONAL LIQUIDATORS  
APPOINTED)(FOR RESTRUCTURING PURPOSES ONLY)  
Note : INTERIM ACCOUNT: 04/08/22 to 29/12/22

Item	Value of Services	USD
Professional Charges		2,100.00
Total		2,100.00

Your Proportion = 100.00%

2,100.00

With Compliments

## Kennedys Chudleigh Ltd

### REMITTANCE SLIP

If paying by bank transfer please quote the Invoice Number below and remit to:-

Bank: HSBC Bermuda  
6 Front Street, Hamilton, HM11 Bermuda  
Account Name: Kennedys Chudleigh Ltd  
Account Number: XXXXXXXXXX

Swift Code: BBDABMHM

If paying by cheque please return the slip below with your remittance to Kennedys Chudleigh Ltd, P.O Box HM 2945, Hamilton HM-MX, Bermuda.

Our Ref : BMM114/1074578/NNM

Invoice No: 31-23-000014/1/BMMAR108

Amount Payable USD 2,100.00

FROM: MARK CHARLES HEALY, IN HIS CAPACITY AS ASSIGNEE FOR THE BENEFIT OF CREDITORS OF CRYSTAL CRUISES LLC, ET AL.

FILE NUMBER: 1074578

# Kennedys

Invoice Number : 31-23-0000014/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Date: 13/01/2023

USD

Professional Charges

2,100.00

Total

2,100.00

## PROFESSIONAL CHARGES - TIMEKEEPER SUMMARY

Timekeeper	Time	Rate	Included Value	Write Off Value	Total Fees
ERIK PENZ	04:00	525.00	2,100.00	0.00	2,100.00
Total					<u>2,100.00</u>

Although this invoice may include time value for attorneys and other fee-earners affiliated with Kennedys Chudleigh Ltd.'s associated law firms, including Kennedys Law LLP, such fee-earners are not employees or consultants of Kennedys Chudleigh Ltd. and are not practising Bermuda law unless admitted to the Bermuda Bar or registered as an associate under the Bermuda Bar Act 1974 and in compliance with all applicable Bermuda laws and regulations. Kennedys Chudleigh Ltd. is a limited liability company incorporated in Bermuda and approved and recognised under the Bermuda Bar (Professional Companies) Rules 2009. "Partner" is a title referring to a director or an employee of the company. A list of such persons can be obtained upon request. Associated with Kennedys Law LLP [www.kennedyslaw.com](http://www.kennedyslaw.com).

# Kennedys

Invoice Number : 31-23-000014/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Time	Time Cost	Time Not Charged	Time Billed	Activity
EP3	04-Aug-22	00:48	420.00	0.00	420.00	REVIEWING FILE ANALYSE CONSIDER
EP3	05-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	08-Aug-22	00:24	210.00	0.00	210.00	REVIEWING FILE ANALYSE CONSIDER
EP3	09-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	12-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	16-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	18-Aug-22	00:18	157.50	0.00	157.50	REVIEWING FILE ANALYSE CONSIDER
EP3	22-Aug-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	21-Sep-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	22-Sep-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	22-Sep-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	23-Sep-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	03-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	07-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	10-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	11-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	12-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	13-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	18-Oct-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	18-Nov-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	22-Nov-22	00:36	315.00	0.00	315.00	CONFERENCE
EP3	23-Nov-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER
EP3	29-Dec-22	00:06	52.50	0.00	52.50	REVIEWING FILE ANALYSE CONSIDER

ERIK PENZ	04:00	2,100.00	0.00	2,100.00
<b>SUB TOTAL</b>	<b>04:00</b>	<b>2,100.00</b>	<b>0.00</b>	<b>2,100.00</b>

# Kennedys

Invoice Number : 31-23-0000014/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

## Billing Narrative

Timekeeper	Date	Notes/Activity	Time	Value
EP3	04-Aug-22	Emails from and to S. Capuano re possible bases for recognition application now that vessels and onboard assets have been sold. Review draft recognition application in consideration of same. Email to S. Capuano, and from and to N. Miles, re same. Emails from S. Capuano and N. Miles re insurance issues.	00 Hours 48 Minutes	420.00
EP3	05-Aug-22	Email from N. Miles re first interim fee application in Florida.	00 Hours 06 Minutes	52.50
EP3	08-Aug-22	Continued attendance on first interim fee application in Florida.	00 Hours 24 Minutes	210.00
EP3	09-Aug-22	Further attendance on first interim fee application in Florida.	00 Hours 06 Minutes	52.50
EP3	12-Aug-22	Receipt of Florida motion to approve payment of Bermuda fees and reimbursement of expenses.	00 Hours 06 Minutes	52.50
EP3	16-Aug-22	Attendance on Florida motion to approve payment of Bermuda fees and reimbursement of expenses.	00 Hours 06 Minutes	52.50
EP3	18-Aug-22	Continued attendance on Florida motion to approve payment of Bermuda fees and reimbursement of expenses.	00 Hours 18 Minutes	157.50
EP3	22-Aug-22	Further attendance on Florida motion to approve payment of Bermuda fees and reimbursement of expenses.	00 Hours 06 Minutes	52.50
EP3	21-Sep-22	Email from S. Capuano re hearing on the fee applications tomorrow morning. Email from, and discussion with, N. Miles re same.	00 Hours 06 Minutes	52.50
EP3	22-Sep-22	Discussions with N. Miles re hearing on the fee applications this morning.	00 Hours 06 Minutes	52.50
EP3	22-Sep-22	Emails from N. Miles, S. Capuano and C. Cruz re motion/application to approve Bermuda fees.	00 Hours 06 Minutes	52.50
EP3	23-Sep-22	Email from C. Cruz re order for Bermuda fees.	00 Hours 06 Minutes	52.50
EP3	03-Oct-22	Emails from N. Miles and S. Capuano re Genting proceedings in Bermuda.	00 Hours 06 Minutes	52.50
EP3	07-Oct-22	Emails from N. Miles and S. Capuano re Bermuda proceedings.	00 Hours 06 Minutes	52.50
EP3	10-Oct-22	Emails from S. Capuano re Bermuda proceedings.	00 Hours 06 Minutes	52.50
EP3	11-Oct-22	Emails from N. Miles and S. Capuano re Bermuda proceedings.	00 Hours 06 Minutes	52.50
EP3	12-Oct-22	Email from S. Capuano re Bermuda proceedings.	00 Hours 06 Minutes	52.50
EP3	13-Oct-22	Review file re current status and next steps in Bermuda.	00 Hours 06 Minutes	52.50
EP3	18-Oct-22	Email from N. Miles re Bermuda proceedings.	00 Hours 06 Minutes	52.50
EP3	18-Nov-22	Emails from S. Capuano, and from D. de Souza and K. Jones of Bast Amron, re M. Healy's special litigation counsel investigating D&O liability claims and scheduling conference call to discuss same.	00 Hours 06 Minutes	52.50
EP3	22-Nov-22	Conference call with D. de Souza re D&O issues.	00 Hours 36 Minutes	315.00
EP3	23-Nov-22	Emails from N. Miles and D. de Souza re D&O coverage and potential conflicts issues.	00 Hours 06 Minutes	52.50
EP3	29-Dec-22	Follow-up on Genting proceedings in Bermuda.	00 Hours 06 Minutes	52.50

# Kennedys

Invoice Number : 31-23-0000014/1/BMMAR108

Kennedys' Reference: : BMM114/1074578/NNM

Timekeeper	Date	Notes/Activity	Time	Value
		Total Time for Fee Earner - EP3	04 Hours 00 Minutes	2,100.00

**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 INCURRED BY KENNEDYS CHUDLEIGH LTD.  
AS BERMUDA COUNSEL TO THE ASSIGNEE FOR THE PERIOD  
AUGUST 1, 2022 THROUGH DECEMBER 31, 2022**

**THIS CAUSE** came before the Court for hearing on \_\_\_\_\_, February \_\_\_\_, 2023 at \_\_\_\_ a.m./p.m. upon the *Motion for Approval and Payment of Fees Incurred by Kennedys Chudleigh Ltd. as Bermuda Counsel to the Assignee for the Period August 1, 2022 through December 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 Kennedys Chudleigh Ltd. seeks compensation in the amount of \$3,914.50 and \$92.00 in expenses for a total award of \$4,006.50 for the period of August 1, 2022 through December 31, 2022. The Court, having considered the Motion and the record in this proceeding, having heard argument of

counsel, finding that notice of the Motion and the hearing was sufficient, and good cause appearing, it is hereby

**ORDERED** that:

1. The Motion is **GRANTED**.
2. Kennedys Chudleigh Ltd., as Bermuda counsel to the Assignee, is awarded fees in the amount of \$4,006.50, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Kennedys Chudleigh Ltd. the sum of \$4,006.50.
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 Kennedys Chudleigh Ltd. for the benefit of the assignment estate.

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

---

HONORABLE ALAN FINE  
Circuit Court Judge

Copies furnished to:

Counsel of record