

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 LOSEY PLLC AS
SPECIAL 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 \$18,251.00 and reimbursement of expenses in the amount of \$165.00 for a total award of \$18,416.00 incurred by by Losey PLLC (“LPLLC”) 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 Applicant 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 LPLLC as special counsel to perform necessary legal services pertaining to security and privacy issues, out of state litigation, compliance issues and the sale of certain assets to maximize their value to the Assignment Estates.

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

5. During the Application Period, LPLLC provided advice and counselling to the Assignee on critical information, security and privacy matters, as well assisting in the ability to sell certain assets and maximize their value while addressing compliance issues. LPLLC successfully negotiated an agreement with CSHV Wilshire Landmark, LLC, the landlord to that certain Standard Form Office Lease dated May 28, 2013, which leased to the Crystal Cruises, LLC the premises located at 1175 Wilshire Boulevard, Los Angeles, California, regarding the potential return of funds. This agreement may result in a substantial recovery to the Assignment Estates. LPLLC has also continued to litigate a case entitled *Mark C. Healy, as Assignee for Crystal Aircruises, LLC v. Marana Aerospace Solutions, Inc., et al.* pending in the United States District Court, District of Arizona, Case No. 4:21-cv-00520-JAS, that may result in a substantial recovery of funds to the Assignment Estates.

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

7. LPLLC, as special counsel to the Assignee, has incurred fees in the amount of \$18,251.00 and expenses in the amount of \$165.00 for legal services provided to the Assignee during the Application Period as identified in the chart below. LPLLC’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
Adam Losey (Partner)	11.50	\$545.00	\$6,267.50
Robert Rubin (Associate)	17.10	\$385.00	\$6,583.50
Robert Rubin (Associate)	.40	\$325.00	\$130.00
Lexie Dantes (Associate)	1.50	\$325.00	\$487.50
Gabrielle Feulner	12.50	\$325.00	\$4,062.50
Claire Beemer (paralegal)	1.80	\$150.00	\$270.00
Jessica Beasom (paralegal)	3.00	\$150.00	\$450.00
TOTALS			\$18,251.00

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Private Investigative Services	\$165.00
Total Expenses	\$165.00

8. The Assignee respectfully requests that the Court approve this Motion and allow LPLLC an award of fees in the amount of \$18,251.00 and expenses in the amount of \$165.00 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 \$18,416.00 in compensation for services rendered by LPLLC, (iii) authorizing the Assignee to

pay LPLLC \$18,416.00; 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
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 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; 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)



INVOICE FOR LEGAL SERVICES

Invoice # 11541310363

Date: 09/07/2022

Due On: 10/07/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	08/25/2022	Communications regarding California lease and next steps regarding same.	0.20	\$545.00	\$109.00
Service	AL	08/30/2022	Communications with opposing counsel regarding application of funds and next steps regarding same.	0.10	\$545.00	\$54.50
Quantity Subtotal						0.3

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.3	\$545.00	\$163.50
Subtotal				\$163.50

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	LD	08/22/2022	Review local rules and administrative manual for the U.S. District Court for the District of Arizona in regards to requesting review of pending motions before the court.	0.70	\$325.00	\$227.50
Quantity Subtotal						0.7

Time Keeper	Position	Quantity	Rate	Total
Lexie Dantes	Associate	0.7	\$325.00	\$227.50
			Subtotal	\$227.50
			Quantity Total	1.0
			Subtotal	\$391.00
			Total	\$391.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310595	11/05/2022	\$1,555.00	\$0.00	\$1,555.00
11541310807	12/01/2022	\$6,346.50	\$0.00	\$6,346.50
11541311099	01/11/2023	\$9,088.00	\$0.00	\$9,088.00
11541311308	02/04/2023	\$1,035.50	\$0.00	\$1,035.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310363	10/07/2022	\$391.00	\$0.00	\$391.00
			Outstanding Balance	\$18,416.00
			Total Amount Outstanding	\$18,416.00

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541310595
Date: 10/06/2022
Due On: 11/05/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	09/07/2022	Review lease agreement and tally by opposition and communications with client regarding same.	0.20	\$545.00	\$109.00
Service	AL	09/12/2022	Communications regarding potential litigation regarding lease draw and cross-reference with terms and letter of credit as well as analysis of same.	0.60	\$545.00	\$327.00
Service	AL	09/18/2022	Communications regarding lease amounts and holdbacks.	0.10	\$545.00	\$54.50
Service	AL	09/20/2022	Communications with client regarding lease matters and next steps regarding same.	0.10	\$545.00	\$54.50
					Quantity Subtotal	1.0

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	1.0	\$545.00	\$545.00
			Subtotal	\$545.00

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	GF	10/03/2022	Review Defendants' Motion for Award of	0.50	\$325.00	\$162.50

Attorneys' Fees and Non-Taxable Expenses and AZ
Local Rule 54.2

Service	AL	10/05/2022	Review motion filing and local rules as well as directing response to same, as well as review of arbitral issues and arbitrator identity and next steps regarding same.	1.50	\$545.00	\$817.50
Service	CB	10/05/2022	Updated docket with "29. (10-04-2022) Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses" and "30. (10-04-2022) Additional Attachments to [29] - Affidavit of Counsel in Support of Motion" and calendared deadline to respond.	0.20	\$150.00	\$30.00
Quantity Subtotal						2.2

Time Keeper	Position	Quantity	Rate	Total
Gabrielle Feulner	Associate	0.5	\$325.00	\$162.50
Adam Losey	Partner	1.5	\$545.00	\$817.50
Claire Beemer	Paralegal	0.2	\$150.00	\$30.00
Subtotal				\$1,010.00
Quantity Total				3.2
Subtotal				\$1,555.00
Total				\$1,555.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310363	10/07/2022	\$391.00	\$0.00	\$391.00
11541310807	12/01/2022	\$6,346.50	\$0.00	\$6,346.50
11541311099	01/11/2023	\$9,088.00	\$0.00	\$9,088.00
11541311308	02/04/2023	\$1,035.50	\$0.00	\$1,035.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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11541310595	11/05/2022	\$1,555.00	\$0.00	\$1,555.00
			Outstanding Balance	\$18,416.00
			Total Amount Outstanding	\$18,416.00

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541310807

Date: 11/01/2022

Due On: 12/01/2022

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	10/27/2022	Communications regarding matter and next steps regarding same.	0.50	\$545.00	\$272.50
Service	RR	10/31/2022	Telephone conference with Adam Losey regarding status and strategy	0.40	\$325.00	\$130.00
Service	AL	10/31/2022	Review lease documentation and letter of credit as well as meeting regarding complaint, PI regarding sublease and lease status, and ABC statute pre-emption.	1.70	\$545.00	\$926.50
				Quantity Subtotal		2.6

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	2.2	\$545.00	\$1,199.00
Robert Rubin	Associate	0.4	\$325.00	\$130.00
			Subtotal	\$1,329.00

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	LD	10/06/2022	Discuss possible arguments to be made in response to Defendants' Motion for Award of	0.30	\$325.00	\$97.50

Attorneys' Fees and Non-Taxable Expenses with G. Feulner.

Service	GF	10/06/2022	Legal research to support arguments in response to Defendant's Motion For Award of Attorneys' Fees and Non-Taxable Expenses.	1.50	\$325.00	\$487.50
Service	GF	10/06/2022	Discuss possible arguments to be made in response to Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses with L. Dantes.	0.30	\$325.00	\$97.50
Service	GF	10/06/2022	Begin initial draft of memorandum in opposition to Defendant's Motion For Award of Attorneys' Fees and Non-Taxable Expenses.	0.50	\$325.00	\$162.50
Service	GF	10/07/2022	Further legal research on arguments to support and drafting of response to Defendants' Motion for Attorneys' Fees and Non-Taxable Expenses.	3.00	\$325.00	\$975.00
Service	GF	10/10/2022	Analyze itemized attorneys' fees and spreadsheet prepared by J. Beasom.	0.50	\$325.00	\$162.50
Service	GF	10/10/2022	Draft unreasonableness of fees section of memorandum in opposition to to Defendant's Motion For Award of Attorneys' Fees and Non-Taxable Expenses.	1.80	\$325.00	\$585.00
Service	JB	10/10/2022	Analyzed and compiled into a spreadsheet the services rendered by Gust Rosenfeld P.L.C for the period 1/1/22-9/29/22 , with services separated into categories based on description of services rendered with highlighted sections of duplicative entries; correspondence with G. Feulner regarding same	3.00	\$150.00	\$450.00
Service	GF	10/11/2022	Continue draft and revisions to memorandum in opposition to Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses.	1.50	\$325.00	\$487.50
Service	GF	10/12/2022	Finish initial draft of memorandum in opposition to Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses.	2.30	\$325.00	\$747.50
Service	CB	10/17/2022	Reviewed and edited Memorandum in Opposition to Defendants' Motion. Correspondence with G. Feulner regarding the same.	0.60	\$150.00	\$90.00
Service	GF	10/17/2022	Finalize memorandum in opposition to Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses; correspondence to C. Beemer regarding same.	0.40	\$325.00	\$130.00
Service	CB	10/17/2022	Filed and updated docket with "31. (10-17-2022) Plaintiff's Memorandum of Points and Authorities in Opposition to Defendants' Motion for Award of Attorneys' Fees and Non-Taxable Expenses." Calendared deadline for defendants to reply.	0.20	\$150.00	\$30.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310807	12/01/2022	\$6,346.50	\$0.00	\$6,346.50
Outstanding Balance				\$18,416.00
Total Amount Outstanding				\$18,416.00

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541311099

Date: 12/12/2022

Due On: 01/11/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Services

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	RR	11/07/2022	Review and analysis of case materials for purposes of preparing complaint; confer with Adam Losey regarding complaint	0.70	\$385.00	\$269.50
Service	RR	11/08/2022	Review and analysis of case materials for purposes of preparing complaint; prepare complaint against CSHV Wilshire Landmark LLC	1.40	\$385.00	\$539.00
Service	RR	11/10/2022	Research and analysis regarding personal jurisdiction	1.00	\$385.00	\$385.00
Service	RR	11/11/2022	Research and analysis regarding personal jurisdiction; analysis of lease agreement and amendments	3.80	\$385.00	\$1,463.00
Service	CB	11/11/2022	Correspondence with R. Rubin regarding hiring of private investigator in investigate address in Los Angeles, California. Reached out to process server to inquire about services and contacts.	0.10	\$150.00	\$15.00
Service	CB	11/14/2022	Correspondence with Andrew's Agency regarding private investigator services in California.	0.10	\$150.00	\$15.00
Service	RR	11/14/2022	Analysis of lease agreement and amendments	0.60	\$385.00	\$231.00
Service	RR	11/14/2022	Review possible private investigators	0.20	\$385.00	\$77.00
Service	RR	11/14/2022	Confer with Adam Losey regarding Complaint	0.30	\$385.00	\$115.50
Service	AL	11/14/2022	Review potential causes of action and statutory basis regarding jurisdiction as well as tortious	0.50	\$545.00	\$272.50

			interference claims and communications and analysis regarding same for drafting of complaint.			
Service	CB	11/14/2022	Sent correspondence to process servers located in the Los Angeles, California area to inquire about private investigative services.	0.20	\$150.00	\$30.00
Service	RR	11/15/2022	Analysis of lease agreement and amendments	2.40	\$385.00	\$924.00
Service	CB	11/15/2022	Received and paid invoice from Jeff Star of Star Services, Inc. for private investigative services. Correspondence with R. Rubin regarding the same.	0.30	\$150.00	\$45.00
Service	RR	11/15/2022	Telephone conference with private investigator	0.10	\$385.00	\$38.50
Service	RR	11/16/2022	Analysis of lease agreement and amendments	2.90	\$385.00	\$1,116.50
Service	RR	11/18/2022	Review communication from the Private Investigator regarding subtenants	0.10	\$385.00	\$38.50
Service	RR	11/18/2022	Prepare Complaint	1.50	\$385.00	\$577.50
Service	RR	11/21/2022	Telephone conference with Paul Mascia regarding status	0.70	\$385.00	\$269.50
Service	RR	11/23/2022	Revise complaint against CSHV Wilshire Landmark regarding California Lease; analysis of current law regarding Healy's entitlement to an accounting from CSHV for purposes of revising complaint	1.40	\$385.00	\$539.00
Service	AL	11/23/2022	Review and revisions on complaint as well as Assignee requested analysis and telephone conference regarding same.	1.50	\$545.00	\$817.50
Service	AL	11/29/2022	Review multiple documents and proceeds agreement and communications with co-counsel and client regarding matter and next steps on same.	1.00	\$545.00	\$545.00

Quantity Subtotal 20.8

Services Subtotal \$8,323.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	11/15/2022	Fee paid to Star Services, Inc. (c/o Jeff Star) for private investigative services at Wilshire Landmark I, 11755 Wilshire Boulevard, Los Angeles, CA 90025. Paid via PayPal. Transaction ID: 1AG61255TP198372W. Invoice no. 36-282.	1.00	\$165.00	\$165.00

Expenses Subtotal \$165.00

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	3.0	\$545.00	\$1,635.00
Robert Rubin	Associate	17.1	\$385.00	\$6,583.50
Claire Beemer	Paralegal	0.7	\$150.00	\$105.00
			Subtotal	\$8,488.50

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	11/09/2022	Communications regarding damages issues and review of same.	0.10	\$545.00	\$54.50
Service	AL	11/14/2022	Videoconference regarding matters and privilege review and waiver issues.	0.50	\$545.00	\$272.50
Service	AL	11/29/2022	Telephone conference and communications regarding matters and next steps regarding same.	0.50	\$545.00	\$272.50
					Quantity Subtotal	1.1

Time Keeper	Position	Quantity	Rate	Total		
Adam Losey	Partner	1.1	\$545.00	\$599.50		
			Subtotal	\$599.50		
					Quantity Total	21.9
					Subtotal	\$9,088.00
					Total	\$9,088.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310363	10/07/2022	\$391.00	\$0.00	\$391.00

11541310595	11/05/2022	\$1,555.00	\$0.00	\$1,555.00
11541310807	12/01/2022	\$6,346.50	\$0.00	\$6,346.50
11541311308	02/04/2023	\$1,035.50	\$0.00	\$1,035.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311099	01/11/2023	\$9,088.00	\$0.00	\$9,088.00
Outstanding Balance				\$18,416.00
Total Amount Outstanding				\$18,416.00

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541311308

Date: 01/05/2023

Due On: 02/04/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	12/12/2022	Telephone conference regarding matters and next steps regarding same.	0.50	\$545.00	\$272.50
Service	AL	12/21/2022	Review lease and communications and analysis regarding same, as well as next steps regarding same and draft communications.	0.50	\$545.00	\$272.50
Service	AL	12/28/2022	Communications with Citi counsel regarding matter and client regarding same.	0.10	\$545.00	\$54.50
Quantity Subtotal						1.1

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	1.1	\$545.00	\$599.50
Subtotal				\$599.50

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	12/21/2022	Communications with client and opposing counsel regarding matter, arbitration, and next steps regarding same.	0.30	\$545.00	\$163.50
Service	AL	12/22/2022	Telephone conference and communications with	0.50	\$545.00	\$272.50

opposing counsel regarding matters and next steps regarding same as well as settlement proposal.

Quantity Subtotal 0.8

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.8	\$545.00	\$436.00
Subtotal				\$436.00

Quantity Total 1.9

Subtotal \$1,035.50

Total \$1,035.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541310363	10/07/2022	\$391.00	\$0.00	\$391.00
11541310595	11/05/2022	\$1,555.00	\$0.00	\$1,555.00
11541310807	12/01/2022	\$6,346.50	\$0.00	\$6,346.50
11541311099	01/11/2023	\$9,088.00	\$0.00	\$9,088.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311308	02/04/2023	\$1,035.50	\$0.00	\$1,035.50
Outstanding Balance				\$18,416.00
Total Amount Outstanding				\$18,416.00

Please make all amounts payable to: Losey PLLC

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 LOSEY PLLC AS SPECIAL 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 Losey PLLC as Special
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 Losey PLLC seeks
compensation in the amount of \$18,251.00 in fees and \$165.00 in expenses for a total ward of
\$18,416.00 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. Losey PLLC, as special counsel to the Assignee, is awarded fees in the amount of \$18,251.00 and expenses in the amount of \$165.00, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Losey PLLC the sum of \$18,416.00.
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 Losey PLLC 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