

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 OF FEES AND EXPENSES INCURRED BY  
NARDELLA & NARDELLA, PLLC, AS 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 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.

NARDELLA & NARDELLA, PLLC (“Applicant”), pursuant to Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), files this motion (the “Motion”) for approval and payment of interim fees in the amount of \$47,915.00 and reimbursement of expenses in the amount of \$517.84, for a total award of \$48,432.84, incurred in connection with its representation of Mark C. Healy (“Assignee”), in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC (“Crystal Cruises” or the “Assignor” and referred to together with Crystal Holdings U.S. LLC (“Crystal Holdings”), and Crystal Aircruises LLC (“Crystal Aircruises”) collectively as the “Assignors”) 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 (individually referred to as an “Assignment Case” and collectively as the “Assignment Cases”).

2. Pursuant to Florida Statute § 727.108(7), the Applicant was retained as co-counsel, along with Berger Singerman LLP, by the Assignee to perform all legal activities required for the

3. 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.

4. As a result of the efforts by the Assignee and the Applicant, the Assignee initiated the following supplemental proceeding seeking the recovery of amounts owed to the estate, *Mark C. Healy v. Resorts World Miami, LLC*, Case No. 2022-020599-CA-01 (the “Supplemental Proceeding”). The Applicant conducted pre-suit negotiations and issued demands for payment prior to the filing of the Supplemental Proceeding, conducted significant research in connection with its preparation of the Complaint filed in the Supplemental Proceeding, and has continued to diligently prosecute the Supplemental Proceeding throughout the Application Period including reviewing, researching and drafting pleadings in the matter.

5. The Applicant also expended a significant amount of time reviewing numerous claims for unpaid wages, reviewing them for potential objections, conducting research where necessary and preparing objections that the Assignee anticipates filing.

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, Applicant also provided additional reasonable and necessary services to the Assignment estates including, without limitation, the following:

(a) assisted with the continued evaluation of the assets of the estate and potential claims available to the Assignment Estate, including without limitation, the Supplemental Proceeding;

(b) prepared for and attended status calls with the Assignee on a weekly basis to discuss the Assignee’s efforts to market and sell the assets of Assignors and all other matters affecting the administration of the Assignment Estates;

(c) reviewed various claims filed against the Assignment Estates by consumer creditors and communicated with creditors;

(d) communicated with creditors and the Assignee's team to discuss the status of these Assignment Cases;

(e) reviewed and analyzed available assets for collection upon successful prosecution of the Assignment Estates' claims;

(f) supported the efforts of the Assignee's special counsel in Belgium in prosecuting Assignee's interest in an action brought by the Assignor in the Belgium Maritime Court prior to the Assignment Date and interacted with special counsel to facilitate progress on the matter on behalf of Assignee;

(g) supported the efforts of the Assignee's special counsel in evaluating the Assignee's potential claim for funds available in connection with the termination of the Assignor's California Lease and interacted with special counsel to facilitate progress on the matter on behalf of Assignee;

(h) attended hearings on the Assignee's Motions to Reject the Assignor's Leases in Florida and California and the fee applications of other professionals retained by the Assignee; and

(i) communications with various claimants regarding status of their proofs of claims.

8. The Applicant, as counsel to the Assignee, has incurred fees in the amount of \$47,915.00 for legal services provided to the Assignee during the Application Period as identified in the chart below and expenses in the amount of \$517.84 (for a total of \$48,432.84) in the nature of filing fees, court reporter fees, and photocopy charges. Applicant's invoice is 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</b>	<b>Total</b>
Paul N. Mascia	70.5	\$425.00	\$29,962.50
Michael A. Nardella	21.4	\$450.00	\$9,630.00
Keenan Smith	16.2	\$250.00	\$4,050.00
Matthew Silbernagel	5.0	\$250.00	\$1,250.00
Karen Cooper	13.3	\$225.00	\$2,992.50
Nicole MacDougall	0.2	\$150.00	\$30.00
<b>TOTALS</b>	<b>126.6</b>		<b>\$47,915.00</b>

**SUMMARY OF EXPENSES INCURRED**

<b>Type of Expense</b>	<b>Amount of Expense</b>
Filing Fee	\$406.00
Summons Fee	15.00
Service of Process	77.40
Postage	\$19.44
<b>Total Expenses</b>	<b>\$517.84</b>

9. Given the nature of these proceedings, and the amount of work that went into representing the Assignee during the Application Period, the Applicant respectfully requests that the Court approve this Application and allow the Applicant an award of fees in the amount of \$47,915.00 and reimbursement of expenses in the amount of \$517.84, for a total of \$48,432.84 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 Applicant’s request for compensation for services rendered in the amount of **\$47,915.00** and reimbursement of expenses in the amount of **\$517.84**, (iii) authorizing the Assignee to pay the Applicant the sum of **\$48,432.84** representing the fees and expenses awarded; 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  
Telephone: (407) 966-2680

By: /s/ Paul N. Mascia

Michael A. Nardella, Esq.  
Florida Bar No. 051265  
Paul N. Mascia  
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; 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/ Paul N. Mascia

Paul N. Mascia, Esq.

**EXHIBIT 1**  
**(Invoices)**



# INVOICE

Invoice # 10962  
Date: 09/26/2022

135 W. Central Blvd., Suite 300  
Orlando, Florida 32801

Mark Healy  
841 Prudential Drive  
Jacksonville, FL 32207

## 3101-00003/Healy-Adv. Crystal Cruises, LLC

### Adv. Crystal Cruises, LLC

#### Services

Date	Time Keeper	Description	Quantity
08/01/2022	PNM	Correspondence from and to co-counsel re hearing on motion to employ gilbraltar counsel	0.10
08/01/2022	PNM	Reviewing notice of appearance for counsel for denholm port services	0.10
08/01/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/01/2022	PNM	Preparing for and attendance at teleconference with client re [REDACTED] [REDACTED] [REDACTED]	0.70
08/01/2022	PNM	Correspondence from and to ca counsel re agreement with genting on ca lease [REDACTED] and status of accounting on ca lease	0.10
08/02/2022	MN	Review fee applications	0.40
08/02/2022	PNM	Reviewing motion to compensate bahamaian counsel	0.10
08/02/2022	PNM	Correspondence from and to co-counsel re administrative expense claim motions	0.10
08/02/2022	PNM	Reviewing status of claims objections and various related claims	0.30
08/02/2022	PNM	Reviewing matter re belgium special counsel administrative claim application	0.20



08/02/2022	PNM	Reviewing matter re ca special counsel administrative claim application	0.20
08/02/2022	PNM	Reviewing matter re gilbraltar counsel administrative claim application	0.20
08/03/2022	KC	Draft proposed order to employ Gibraltar counsel.	0.40
08/03/2022	KC	Prepare cover letter to judge; and submit proposed order employing Ince via CourtMap.	0.30
08/03/2022	PNM	Preparing for and appearing at hearing on motion to employ gibraltar counsel	0.90
08/03/2022	PNM	Preparing order granting motion to employ gibraltar counsel	0.10
08/03/2022	PNM	Correspondence to ca counsel re administrative expense claim	0.10
08/03/2022	PNM	Correspondence with ca counsel re administrative claims	0.20
08/03/2022	PNM	Correspondence from and to arch counsel re proof of claim	0.10
08/03/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/03/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.10
08/04/2022	KC	Receipt and review of order employing Ince as Gibraltar counsel; prepare service email re: same; and email [REDACTED]	0.30
08/04/2022	KC	Electronically file Motion to Reject FL Lease and prepare service email re: same.	0.30
08/04/2022	PNM	Revising motion to reject florida lease	0.20
08/04/2022	PNM	Reviewing order approving employment of gibraltar counsel and instructions of staff re	0.10
08/05/2022	MN	Review claims priority in light of claims	0.10
08/05/2022	KC	Receipt and review of Notice of Hearing on Motion to Approve Parris Fees; and calendar.	0.10
08/05/2022	KC	Email correspondence with co-counsel regarding setting hearing on Motion to Reject FL Lease; and reserve time on calendar.	0.20
08/05/2022	KC	Prepare service email of Notice of Hearing on Motion to Reject FL Lease.	0.10
08/05/2022	PNM	Telephone conference with client [REDACTED] [REDACTED]	0.80
08/05/2022	PNM	Reviewing notice of hearing for motion for interm compensation to bahammas counsel	0.10
08/05/2022	PNM	Preparing notice of hearing on motion to reject fl lease	0.10
08/08/2022	MN	Review issues related to maintenance of IP that was sold	0.10
08/08/2022	MN	Prepare for and attend conference call with client [REDACTED] [REDACTED]	1.20
08/08/2022	PNM	Reviewing assignee second interim report and related correspondence with co-	0.20

		counsel	
08/08/2022	PNM	Reviewing status of administration and next steps in matter	0.20
08/08/2022	PNM	Preparing interim fee application	0.20
08/08/2022	PNM	Reivewing notice of appearance for cinicnatti insurance counsel	0.10
08/09/2022	MN	Call with special counsel regarding lawsuits and issues with landlord a [REDACTED]	0.40
08/09/2022	PNM	Correspondence from and to alevy counsel re [REDACTED]	0.10
08/09/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/09/2022	PNM	Corrpesondence from and to co-counsel re interim fee application for belgium counsel	0.10
08/09/2022	PNM	Correpondence to belgium counsel re interm fee application	0.10
08/10/2022	PNM	Reviewing wijesinwardena proof of claim	0.10
08/10/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/11/2022	PNM	Correspondence from and to co-counsel re ca counsel administrative claim	0.10
08/11/2022	PNM	Review and analysis of fitsmmons consumer proof of claim	0.10
08/11/2022	PNM	Instructions to staff re preparation of interim motion for administrative expenses	0.10
08/12/2022	MN	Call with client regarding [REDACTED]	0.70
08/12/2022	PNM	Telephone conference with client re [REDACTED]	0.60
08/15/2022	KC	Review time entries and expenses; draft Motion for Approval of Fees and Expenses incurred by Nardella & Nardella; and compile invoices.	1.10
08/15/2022	PNM	Reviewing interim case management report	0.10
08/15/2022	PNM	Correspondence from client re [REDACTED]	0.10
08/15/2022	PNM	Preparing interim application for compensation and related exhibits	0.70
08/16/2022	KC	Draft proposed order on Motion for Approval of Fees and Expenses incurred by Nardella & Nardella	0.20
08/16/2022	MN	Review and respond to emails regarding amounts due from Resorts World	0.10
08/16/2022	KC	Combine and redact exhibits; electronically file Motion for Approval of Fees and Expenses incurred by Nardella; and serve same via email.	0.50
08/16/2022	MN	Call with counsel for Resorts World regarding [REDACTED] obligation on sale and purchase agreement	2.00
08/16/2022	MN	Review amended motion to reject FL lease	0.10

08/16/2022	MN	Call regarding fee applications and hearing dates	0.20
08/16/2022	PNM	Preparing proposed order granting motion for interim compensation	0.10
08/16/2022	PNM	Telephone conference with client [REDACTED] [REDACTED] [REDACTED]	0.60
08/16/2022	PNM	Telephone conference with genting entities and client re [REDACTED] [REDACTED]	0.60
08/16/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.90
08/16/2022	PNM	Preparing amended motion to reject florida lease	0.40
08/16/2022	PNM	Reviewing matter re status conference hearing and related updates for court	0.30
08/16/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/17/2022	KC	Electronically file Amended Motion to Reject FL Lease; and serve same via email and mail;	0.30
08/17/2022	KC	Prepare Certificate of Service of Notice of Hearing on Amended Motion to Reject FI Lease.	0.20
08/17/2022	KC	Electronically file Certificate of Service of Notice of Hearing on Amended Motion to Reject FI Lease; and serve same via email and mail.	0.20
08/17/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.30
08/17/2022	PNM	Finalizing amended motion to reject florida lease and instructions to staff re same	0.30
08/17/2022	PNM	Correspondence to client re [REDACTED]	0.10
08/17/2022	PNM	Telephone conference with client re [REDACTED]	0.20
08/17/2022	PNM	Preparing folk second set of interrogatories to plaintiffs	0.90
08/17/2022	PNM	Preparing certificate of service of notice of hearing to new landlord counsel addresses	0.10
08/17/2022	PNM	Telephone call from consumer claimant yee	0.10
08/18/2022	PNM	Preparing amended interim compensation application	0.60
08/18/2022	PNM	Review and analysis of motions for interim compensation for various special counsel	0.10
08/19/2022	KC	Receipt and review of Motions for Fee Approvals.	0.10
08/19/2022	KC	Receipt and review of Notice of Special Set Hearing and calendar.	0.10
08/19/2022	PNM	Reviewing notice of hearing on various motions for interim compensation	0.10
08/22/2022	KC	Review Re-Notice of Hearing on Parris Fee Approval; and update calendar.	0.10

08/22/2022	KC	Receipt and review of Foresters' second request for production; and calendar response deadline.	0.10
08/22/2022	MN	Call with special counsel regarding lease mitigation	0.30
08/22/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.80
08/22/2022	PNM	Reviewing amended notice of hearing for paris whittaker motion for interim compensation	0.10
08/22/2022	PNM	Reviewing matter re pending tasks and client conference [REDACTED]	0.20
08/22/2022	PNM	Correspondence from and to claimant spears re estate administration and related distribution on claims	0.10
08/23/2022	MN	Review objection to fee applications	0.10
08/23/2022	KC	Pull authorities in support of Motion to Reject Florida Lease; prepare hearing folder; and upload authorities via court's case management system.	0.30
08/23/2022	KC	Review Astrea invoice; and draft Motion for Approval of Fees and Expenses incurred by Astrea.	0.60
08/25/2022	KC	Review time entries and expenses; draft Motion for Approval of Fees and Expenses incurred by Nardella & Nardella; and compile and redact invoices.	1.00
08/25/2022	KC	Receipt and review of Order Resetting Interim Case Management Conference; and update calendar.	0.10
08/25/2022	PNM	Preparing interim fee application for belgium counsel	0.10
08/26/2022	PNM	Reviewing order setting case management conference	0.10
08/26/2022	PNM	Reviewing objection of dehnolm port services to interim fee applications	0.10
08/29/2022	KC	Receipt and review Notice of Hearing on Motion to Clarify; and update calendar.	0.10
08/29/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.60
08/29/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.70
08/30/2022	PNM	Reviewing notice of hearing on motion to confirm absence of stay on pending employee action against assignor	0.10
08/30/2022	PNM	Correspondence from and to belgium counsel re case status	0.10

**Quantity Subtotal**                    **29.4**  
**Services Subtotal**                    **\$11,332.50**

**Expenses**

Date	Description	Quantity	Rate	Total
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08/17/2022	E108 Postage: Service for mailing Notice of Hearing & Amended Motion by Assignee for Order Authorizing Rejection of an Unexpired Lease to corresponding parties.	2.00	\$0.81	\$1.62
08/17/2022	E108 Postage: Service for mailing Certificate of Service of the Notice of Hearing on Motion by Assignee for Order Authorizing Rejection of an Unexpired Leases to corresponding parties.	2.00	\$0.57	\$1.14
			<b>Expenses Subtotal</b>	<b>\$2.76</b>

Time Keeper	Quantity	Rate	Total	
Paul Mascia	15.6	\$425.00	\$6,630.00	
Michael A. Nardella	7.1	\$450.00	\$3,195.00	
Karen Cooper	6.7	\$225.00	\$1,507.50	
			<b>Quantity Total</b>	<b>29.4</b>
			<b>Subtotal</b>	<b>\$11,335.26</b>
			<b>Total</b>	<b>\$11,335.26</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11199	10/07/2022	\$4,336.78	\$0.00	\$4,336.78
11200	11/08/2022	\$16,538.50	\$0.00	\$16,538.50
11365	12/01/2022	\$11,444.80	\$0.00	\$11,444.80
11637	01/10/2023	\$4,777.50	\$0.00	\$4,777.50

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10962	09/26/2022	\$11,335.26	\$0.00	\$11,335.26
			<b>Outstanding Balance</b>	<b>\$48,432.84</b>
			<b>Total Amount Outstanding</b>	<b>\$48,432.84</b>

**IOLTA Trust Account**

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00
<b>IOLTA Trust Account Balance</b>					<b>\$0.00</b>	

Please make all amounts payable to: Nardella & Nardella, PLLC

**Payment Link:** <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.



# INVOICE

Invoice # 11199  
Date: 10/07/2022

135 W. Central Blvd., Suite 300  
Orlando, Florida 32801

Mark Healy  
841 Prudential Drive  
Jacksonville, FL 32207

## 3101-00003/Healy-Adv. Crystal Cruises, LLC

### Adv. Crystal Cruises, LLC

#### Services

Date	Time Keeper	Description	Quantity
09/01/2022	PNM	Correspondence from and to co-counsel re hearing on motion to reject fl leases	0.10
09/05/2022	PNM	Correspondence from and to Belgium counsel re matter status	0.10
09/06/2022	MN	Consideration of issues related to rejection of lease	0.10
09/06/2022	PNM	Correspondence from belguim counsel re application for interim compensation	0.10
09/07/2022	KC	Draft proposed order granting motion to reject FL lease.	0.30
09/07/2022	KC	Prepare cover letter to judge re: proposed order rejecting FL lease; and submit proposed order via CourtMap	0.30
09/07/2022	MN	Call with client regarding [REDACTED]	0.90
09/07/2022	PNM	Reviewing matter re omnibus objection of denholm port services to all interim compensation applications	0.10
09/07/2022	PNM	Telephone conference with client re [REDACTED]	0.30
09/07/2022	PNM	Preparing for hearing on motion to reject florida leases	0.20
09/07/2022	PNM	Attending hearing on motion to reject florida leases	0.60

09/07/2022	PNM	Preparing order granting motion to reject fl leases	0.30
09/07/2022	PNM	Correpondence to client re hea [REDACTED]	0.10
09/07/2022	PNM	Telephone call from claimant bollar re claim	0.10
09/08/2022	MN	Review documents from client regarding [REDACTED]	0.10
09/08/2022	KC	Download and save Resort World documents.	0.20
09/08/2022	PNM	Correspondence from client re [REDACTED]	0.10
09/08/2022	PNM	Correspondnece to client re [REDACTED]	0.10
09/09/2022	PNM	Correspondnece to co-counsel re hearing on motion to lift stay	0.10
09/12/2022	KC	Receipt and review of order rejecting FL lease; and prepare service email re: same.	0.20
09/12/2022	KC	Search clerk records and retrieve personal injury complaint and Notice of assignment in Mirko Laptalo v. Crystal Cruises; and [REDACTED] client.	0.30
09/12/2022	MN	Call regarding demand letter on D&O	0.10
09/12/2022	MN	Call with client regarding [REDACTED]	0.60
09/14/2022	PNM	Reviewing order granting rejection of florida leases	0.10
09/14/2022	PNM	Reviewing order granting parris whitaker interim fee application	0.10
09/14/2022	PNM	Reviewing proof of service of order granting rejection of florida leases	0.10
09/14/2022	PNM	Correpondece from and to client re [REDACTED]	0.10
09/14/2022	PNM	Reviewing order granting motion to clarify stay in paga lawsuit	0.10
09/15/2022	KC	Email correspondence to Nadira re: [REDACTED]	0.10
09/15/2022	KC	Receipt and review of Order Cancelling Interim Case Management Conference; and update calendar.	0.10
09/16/2022	PNM	Reviewing order cancelling case management conference	0.10
09/19/2022	MN	Call regarding demand letter to Resorts World	0.10
09/19/2022	PNM	Drafting demand letter to resorts world miami and review of file documentaiton in preparation of same	1.40
09/19/2022	PNM	Telephone conference with client re [REDACTED]	0.30
09/19/2022	PNM	Correspondence to client re [REDACTED]	0.10
09/19/2022	PNM	Correspondence from and to belguim counsel re damages	0.10
09/19/2022	PNM	Correspondence to client re [REDACTED]	0.10



09/21/2022	PNM	Correspondence from client re [REDACTED]	0.10
09/21/2022	PNM	Reviewing notice of appearance for denholm port counsel	0.10
09/22/2022	PNM	Preparing for hearing on various fee motions	0.30
09/22/2022	PNM	Attending hearing on motions for interim compensation	0.80
09/22/2022	PNM	Reviewing court notice re order granting interim fee application	0.10
09/23/2022	KC	Receipt and review of multiple orders approving attorneys fees.	0.10
09/23/2022	KC	Email correspondence with co-counsel providing wire instructions for fees approved.	0.10
09/23/2022	PNM	Correspondence from counsel for claimant Perez	0.10
09/23/2022	PNM	Reviewing order granting interim fee application	0.10
09/23/2022	PNM	Instructions to staff re re data from client [REDACTED]	0.10
09/23/2022	PNM	Instructions to staff re order granting interim compensation	0.10
09/26/2022	PNM	Reviewing order granting assignee interim fee application	0.10
09/26/2022	PNM	Reviewing matter status and next steps in estate administration	0.10
09/26/2022	PNM	Correspondence to co-counsel re fee application backup	0.10
09/30/2022	KC	Prepare Notice of Filing Affidavit of Service of Motion and Order Rejecting FL leases.	0.10
09/30/2022	KC	Electronically file Notice of Filing Affidavit of Service of Motion and Order Rejecting FL leases.	0.10
09/30/2022	KC	Prepare service email re: Notice of Filing Affidavit of Service of Motion and Order Rejecting FL leases.	0.10
09/30/2022	PNM	Preparing notice of filing affidavit of service of order granting motion to reject florida leases	0.10

**Quantity Subtotal 11.0**

**Services Subtotal \$4,322.50**

**Expenses**

Date	Description	Quantity	Rate	Total
09/12/2022	E108 Postage: Service for mailing Order Granting Amended Motion by Assignee for Order Authorizing Rejection of an Unexpired Leases to Kevin Jones & Stacey Rowland.	2.00	\$0.57	\$1.14
09/19/2022	E108 Postage: Service of Demand to Resorts World Miami attn: Kevin Jones via USPS - Certified Mail, eReturn Receipt Requested.	1.00	\$6.57	\$6.57

09/19/2022	E108 Postage: Service of Demand to Resorts World Miami attn: President & General Counsel via USPS - Certified Mail, eReturn Receipt Requested.	1.00	\$6.57	\$6.57
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**Expenses Subtotal            \$14.28**

Time Keeper	Quantity	Rate	Total
Paul Mascia	7.1	\$425.00	\$3,017.50
Michael A. Nardella	1.9	\$450.00	\$855.00
Karen Cooper	2.0	\$225.00	\$450.00
<b>Quantity Total</b>			<b>11.0</b>
<b>Subtotal</b>			<b>\$4,336.78</b>
<b>Total</b>			<b>\$4,336.78</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10962	09/26/2022	\$11,335.26	\$0.00	\$11,335.26
11200	11/08/2022	\$16,538.50	\$0.00	\$16,538.50
11365	12/01/2022	\$11,444.80	\$0.00	\$11,444.80
11637	01/10/2023	\$4,777.50	\$0.00	\$4,777.50

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11199	10/07/2022	\$4,336.78	\$0.00	\$4,336.78
<b>Outstanding Balance</b>				<b>\$48,432.84</b>
<b>Total Amount Outstanding</b>				<b>\$48,432.84</b>

### IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00
<b>IOLTA Trust Account Balance</b>					<b>\$0.00</b>	

Please make all amounts payable to: Nardella & Nardella, PLLC

**Payment Link:** <https://app.clio.com/link/7TanFHMgYd6d>

Payment is due upon receipt.



# INVOICE

Invoice # 11200  
Date: 11/08/2022

135 W. Central Blvd., Suite 300  
Orlando, Florida 32801

Mark Healy  
841 Prudential Drive  
Jacksonville, FL 32207

## 3101-00003/Healy-Adv. Crystal Cruises, LLC

### Adv. Crystal Cruises, LLC

#### Services

Date	Time Keeper	Description	Quantity
10/03/2022	MN	Prepare for and attend call with client [REDACTED]	0.10
10/03/2022	PNM	Reviewing status of resorts world miami demand	0.10
10/03/2022	PNM	Telephone conference with client re [REDACTED]	0.70
10/05/2022	MN	Review motion for fees regarding arbitration	0.10
10/05/2022	MN	Email client regarding [REDACTED]	0.10
10/05/2022	MN	Call client [REDACTED]	1.10
10/05/2022	PNM	Correspondence from and to belgium counsel re status of belgium litigation	0.20
10/05/2022	PNM	Correspondence to client re [REDACTED]	0.10
10/05/2022	PNM	Telephone conference with client re [REDACTED]	0.30
10/05/2022	PNM	Reviewing assignor rep deposition testimony re building improvements payment obligation and preparing memo to file re same in preparation of complaint	0.40
10/06/2022	PNM	Correspondence from and to belgium counsel re available damages	0.10
10/10/2022	MN	Call regarding upcoming review of tasks	0.10

10/10/2022	MN	Call regarding [REDACTED] with Resort World	0.10
10/10/2022	PNM	Telephone conference with client re [REDACTED]	0.30
10/10/2022	PNM	Correspondence from and to belgium counsel re maritime claim	0.20
10/10/2022	PNM	Correspondence from and to co-counsel re case management matters	0.10
10/10/2022	PNM	Reviewing matter re building improvement purchase price claim	0.10
10/12/2022	MN	Call to client regarding [REDACTED]	0.10
10/12/2022	PNM	Telephone conference with belgium counsel re maritime claim, next steps in litigation, potential damages and settlement range	0.70
10/12/2022	PNM	Reviewing matter re cancellation of interim case management conference	0.10
10/14/2022	PNM	Reviewing order cancelling case management conference	0.10
10/17/2022	MN	Call regarding claims in Belgium and issues with Belgian lawyers	0.40
10/17/2022	MN	Call with client regarding [REDACTED]	0.60
10/17/2022	PNM	Correspondence from and to belgium counsel re maritime claim	0.10
10/17/2022	PNM	Preparing for and attending telephone conference with client re [REDACTED]	0.80
10/18/2022	KC	Receipt and review of Order Cancelling Interim Case Management Conference; and update calendar.	0.10
10/18/2022	MN	Communications regarding subpoenas for information on letters of credit	0.30
10/18/2022	KS	Initial review of [REDACTED] objection.	0.20
10/18/2022	KS	Review of statute and law re bases for objection to [REDACTED] claim based on form alone. Draft memo to attorneys Mascia and Nardella re f [REDACTED] objections.	0.70
10/18/2022	PNM	Correspondence from client re [REDACTED]	0.10
10/18/2022	PNM	Initial review of documents in support of wage claim exemption	0.30
10/18/2022	PNM	Initial review of matter re omnibus objection wage claims	0.20
10/18/2022	PNM	Reviewing potential causes of action for complaint [REDACTED] [REDACTED] ment claims, related documentary support for same and preparation of memo to file re same	1.60
10/18/2022	PNM	Initial preparation of complaint and related assembly of factual allegations	0.90
10/18/2022	PNM	Initial review of miami dade business court procedures re filing supplemental complaint against world resorts miami	0.20
10/19/2022	KS	Conference with attorney Mascia re Fernandez objection, research of law re objections to claims and begin drafting claim objection.	3.60

10/19/2022	MRS	Case law research regarding [REDACTED] legal research on [REDACTED] legal research [REDACTED] case law research on [REDACTED] [REDACTED]	4.80
10/19/2022	PNM	Preparing objection to [REDACTED] claim and reviewing [REDACTED] re same and [REDACTED]	0.90
10/19/2022	PNM	Review and analysis of cases re [REDACTED] [REDACTED]	0.80
10/19/2022	PNM	Further preparation of supplemental complaint against resorts world miami	2.70
10/19/2022	PNM	Initial review of potential implications and causes of action [REDACTED] [REDACTED]	0.80
10/20/2022	MRS	Summarize research on [REDACTED]	0.20
10/20/2022	KS	Continue drafting objection to claim of [REDACTED]	3.40
10/21/2022	KS	Draft objection.	1.00
10/21/2022	PNM	Further preparation of complaint against resorts world miami	0.80
10/21/2022	PNM	Research re s[REDACTED] of shrine building as historical property and related information in preparation of complaint	0.40
10/21/2022	PNM	Research [REDACTED] [REDACTED] and preparation of memo to file re same	1.90
10/23/2022	PNM	Researching cases re [REDACTED] [REDACTED] and preparation of memo to file re same	1.60
10/24/2022	KS	Finalize objection to claim of [REDACTED] [REDACTED]	2.60
10/24/2022	MN	Review terms of settlement with Resorts World and issues [REDACTED]	0.40
10/24/2022	MN	Review objection to claim of M [REDACTED]	0.10
10/24/2022	MN	Call regarding status including complaint against Resorts World and objection to claim of F [REDACTED]	1.10
10/24/2022	PNM	Further review of ancillary issues and legal arguments re p [REDACTED] supplemental complaint	0.40
10/25/2022	PNM	Correspondence from and to brier counsel re withdrawal of claim	0.10
10/26/2022	MN	Continued review of complaint	0.70
10/26/2022	PNM	Review and analysis of case status and settlement memorandum from belgium counsel	0.30
10/26/2022	PNM	Correspondence from and to belgium counsel re potential settlement values	0.10
10/26/2022	PNM	Preparing memorandum to client re [REDACTED]	0.10

10/26/2022	PNM	Telephone conference with client	0.10
10/26/2022	PNM	Telephone conference with counsel for claimant alpha tango	0.20
10/26/2022	PNM	Telephone call to claimaint rosinsky	0.10
10/26/2022	PNM	Further preparation of supplemental complaint and research re cases ██	1.10
10/26/2022	PNM	Correspondence to client re ██	0.10
10/27/2022	MN	Call with client regarding ██	0.80
10/27/2022	KC	Create exhibit pages, combine exhibits, and electronically file Complaint package.	0.60
10/27/2022	KC	Search Sunbiz for registered agent of Resorts World; and prepare summons.	0.20
10/27/2022	KC	Phone call and email to clerk regarding supplementary proceeding to be assigned to same judge.	0.10
10/27/2022	MN	Call regarding lawsuit against CA landlord	0.40
10/27/2022	PNM	Reviewing matter re filing and service of supplemental complaint and instructions to staff re same	0.20
10/27/2022	PNM	Correspondence from and to belgium counsel re status of conference with court surveyor	0.10
10/31/2022	KC	Checked docket as to case number and judge assigned.	0.10
10/31/2022	KC	Electronically file proposed summons	0.10
10/31/2022	PNM	Reviewing summons	0.10
10/31/2022	PNM	Correspondence from and to az counsel re supplemental claim	0.10

**Quantity Subtotal**                    **44.9**  
**Services Subtotal**                    **\$16,117.50**

**Expenses**

Date	Description	Quantity	Rate	Total
10/27/2022	Miami-Dade clerk - Complaint filing fee (FL E filing Portal)	1.00	\$406.00	\$406.00
10/31/2022	Miami Clerk - Summons Fee (FL E-filing Portal)	1.00	\$15.00	\$15.00

**Expenses Subtotal**                    **\$421.00**

Time Keeper	Quantity	Rate	Total
Paul Mascia	20.7	\$425.00	\$8,797.50

Michael A. Nardella	6.5	\$450.00	\$2,925.00
Matthew Silbernagel	5.0	\$250.00	\$1,250.00
Karen Cooper	1.2	\$225.00	\$270.00
Keenan Smith	11.5	\$250.00	\$2,875.00
<b>Quantity Total</b>			<b>44.9</b>
<b>Subtotal</b>			<b>\$16,538.50</b>
<b>Total</b>			<b>\$16,538.50</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10962	09/26/2022	\$11,335.26	\$0.00	\$11,335.26
11199	10/07/2022	\$4,336.78	\$0.00	\$4,336.78
11365	12/01/2022	\$11,444.80	\$0.00	\$11,444.80
11637	01/10/2023	\$4,777.50	\$0.00	\$4,777.50

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11200	11/08/2022	\$16,538.50	\$0.00	\$16,538.50
<b>Outstanding Balance</b>				<b>\$48,432.84</b>
<b>Total Amount Outstanding</b>				<b>\$48,432.84</b>

### IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24



10/03/2022	Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21	\$34,013.03
10/03/2022	Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00	\$22,493.03
10/03/2022	Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50	\$12,515.53
10/03/2022	Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53	\$6,780.00
10/03/2022	Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00	\$0.00
<b>IOLTA Trust Account Balance</b>				<b>\$0.00</b>

Please make all amounts payable to: Nardella & Nardella, PLLC

**Payment Link:** <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.



# INVOICE

Invoice # 11365  
Date: 12/01/2022

135 W. Central Blvd., Suite 300  
Orlando, Florida 32801

Mark Healy  
841 Prudential Drive  
Jacksonville, FL 32207

## 3101-00003/Healy-Adv. Crystal Cruises, LLC

### Adv. Crystal Cruises, LLC

#### Services

Date	Time Keeper	Description	Quantity
11/01/2022	KS	Brief research of [REDACTED]	0.10
11/01/2022	PNM	Reviewing matter status and next steps re resorts world miami litigation	0.20
11/01/2022	PNM	Initial preparation of omnibus objection to employee claims	0.20
11/04/2022	KC	Retrieve issued summons and email correspondence with process server to serve.	0.20
11/04/2022	NM	Research Miami Dade dockets for Judge Assignment to all open Crystal and Healy cases.	0.20
11/04/2022	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
11/04/2022	PNM	Reviewing notice of hearing	0.10
11/04/2022	PNM	Reviewing mater re omnibus objection to wage claims	0.10
11/07/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.50
11/07/2022	KS	Review revisions to objection to Fernandez claim.	0.20
11/07/2022	PNM	Reviewing matter re upcoming hearing on motion for reconsideration and related deadlines re same	0.20

11/07/2022	PNM	Preparing for and attending telephone conference with client re [REDACTED]	0.60
11/07/2022	PNM	Preparing objection to f [REDACTED] proof of claim	0.90
11/08/2022	KC	Receive court notification and calendar Jan 2023 Case Management Conference in Healy v. Resorts World.	0.10
11/08/2022	MN	Call with client regarding [REDACTED]	0.20
11/08/2022	MN	Call with counsel regarding updates on causes of action	0.60
11/08/2022	KC	Review Miami business court rules and procedures and notate file.	0.30
11/08/2022	KC	Receipt and review Notice and Order of Motion and Memorandum Requirements.	0.10
11/08/2022	KC	Receipt and review Notice and Order of Adherence to Complex Business Litigation Section Procedures.	0.10
11/08/2022	KC	Receipt and review of Mandatory Order to Confer and Certification Requirement.	0.10
11/08/2022	KC	Receipt and review of Order Setting Initial Case Management Conference and to Prepare a Mandatory Case management Report; and calendar deadlines.	0.30
11/08/2022	KC	Receipt and review of Return of Service of Resorts World; and calendar response deadline.	0.10
11/08/2022	KC	Prepare Certificate of Service of Orders	0.30
11/08/2022	PNM	Reviewing matter status and next steps in various administration matters	0.30
11/08/2022	PNM	Reviewing notice of case management hearing for supplemental action v. resorts world miami	0.10
11/08/2022	PNM	Preparing for and attending telephone conference with client and special counsel re [REDACTED]	0.80
11/08/2022	PNM	Reviewing case management orders in world resorts miami case and related business court requirements	0.20
11/08/2022	PNM	Reviewing notification of service of process on rsm	0.10
11/08/2022	PNM	Reviewing information required from [REDACTED] in evaluation of potential claims	0.20
11/09/2022	MN	Call regarding documents for production to [REDACTED]	0.40
11/09/2022	KC	Receive court notification of rescheduled Case Management Conference and update calendar.	0.10
11/09/2022	KS	Research and review of affidavit of service.	0.40
11/09/2022	KC	Receipt and review of Notice of Rescheduled CMC and update calendar.	0.10
11/09/2022	KC	Receipt and review of Amended Order Setting Initial CMC and update deadlines.	0.10



11/14/2022	MN	Call with CA counsel regarding lease dispute [REDACTED]	0.30
11/14/2022	MN	Call with client regarding [REDACTED]	0.80
11/14/2022	PNM	Reviewing filed certificate of service in rsm matter	0.10
11/14/2022	PNM	Correspondence to belgium counsel re status of pending litigation and surveyor meeting	0.10
11/14/2022	PNM	Reviewing response to kanter objection to confirmation order	0.20
11/14/2022	PNM	Preparing omnibus wage objection	0.40
11/14/2022	PNM	Reviewing status of various matters in preparation of next steps in administration	0.10
11/14/2022	PNM	Telephone conference with client re [REDACTED]	0.80
11/15/2022	KS	Brief call with claimant Evelyn Fernandez.	0.10
11/15/2022	PNM	Correspondence to client re [REDACTED]	0.10
11/15/2022	PNM	Telephone conference with alevy counsel re request for assignor liability insurance policy	0.10
11/15/2022	PNM	Telephone conference with client re [REDACTED]	0.20
11/16/2022	KS	Revise omnibus objection and accompanying proposed order.	0.30
11/17/2022	PNM	Correspondence from and to counsel for claimant viking life saving equipment	0.10
11/18/2022	PNM	Reviewing final fee app for phelps dunbar	0.10
11/18/2022	PNM	Reviewing affidavit of service of motion for final compensation for phelps dunbar	0.10
11/21/2022	KC	Receive DVD and attempt to download Notice of Motion with Supporting Exhibits.	0.20
11/21/2022	PNM	Telephone conference with special counsel re [REDACTED] claim against california [REDACTED] related causes of action, related litigation strategy and next steps in matter	0.60
11/21/2022	PNM	Telephone conference with client re [REDACTED]	0.90
11/21/2022	PNM	Correspondence from alevy counsel re alevy claim	0.10
11/22/2022	KC	Email correspondence with New York counsel re: copy of Notice of Motion.	0.10
11/23/2022	PNM	Telephone conference with client re [REDACTED]	0.40
11/23/2022	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
11/23/2022	PNM	Correspondence from and to belgium counsel re status of meeting with court	0.10

		surveyor and next steps in litigation	
11/23/2022	PNM	Furhter preparation of omnibus objection to objectionable wage claims	1.90
11/23/2022	PNM	Telephone conference with special counsel re [REDACTED] [REDACTED] litigation strategy and next steps in matter	0.70
11/23/2022	PNM	Preparing memo to client re [REDACTED] [REDACTED]	0.20
11/23/2022	PNM	Preparing memo to client re [REDACTED]	0.20
11/25/2022	MN	Call with client regarding [REDACTED] [REDACTED]	0.40
11/25/2022	MN	Call with client regarding [REDACTED]	0.30
11/25/2022	MN	Call with client regarding [REDACTED]	0.10
11/28/2022	MN	Call regarding [REDACTED]	0.10
11/28/2022	MN	Call with client and co-counsel regarding [REDACTED]	0.60
11/28/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.20
11/28/2022	PNM	Telephone conference with client re [REDACTED]	0.20
11/28/2022	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.20
11/28/2022	PNM	Correspondence from and to rsm counsel re extension request	0.10
11/28/2022	PNM	Correspondence from and to claimant national arbitration re claim status	0.10
11/28/2022	PNM	Correspondence to ca counsel re [REDACTED]aint v. landlord	0.10
11/28/2022	PNM	Reviewing rsm matter in advance of conference with opposing counsel	0.10
11/28/2022	PNM	Correspondence from ca counsel and to client re [REDACTED]	0.10
11/28/2022	PNM	Telephone call with rsm counsel re response to complaint	0.20
11/28/2022	PNM	Correspondence from and to client re [REDACTED]	0.10
11/28/2022	PNM	Correspondence to rsw counsel re extension of deadline to answer complaint	0.10
11/28/2022	PNM	Telephone conference with client re [REDACTED]	0.50
11/28/2022	PNM	Reviewing matter re s[REDACTED] of production in d&o case and potential inadvertent [REDACTED]s for rsm case	0.10
11/29/2022	PNM	Telephone conference with client and ca counsel re [REDACTED] [REDACTED]	0.50
11/29/2022	PNM	Correspondence from special counsel re [REDACTED]	0.10
11/30/2022	PNM	Reviewing matter re [REDACTED] and	0.50

preparing memo to client [REDACTED]

11/30/2022	PNM	Correspondence from and to resorts world counsel	0.10
<b>Quantity Subtotal</b>			<b>29.8</b>
<b>Services Subtotal</b>			<b>\$11,365.00</b>

**Expenses**

Date	Description	Quantity	Rate	Total
11/14/2022	E108 Postage: Service for mailing 8 items to Resorts World Miami, LLC c/o CSC.	1.00	\$2.40	\$2.40
11/30/2022	Lynx Legal Services - Inv. no. LIN-2022036465 - Service of Process of summons on Resorts World Miami, LLC	1.00	\$77.40	\$77.40
<b>Expenses Subtotal</b>			<b>\$79.80</b>	

Time Keeper	Quantity	Rate	Total
Paul Mascia	16.6	\$425.00	\$7,055.00
Michael A. Nardella	5.5	\$450.00	\$2,475.00
Karen Cooper	2.8	\$225.00	\$630.00
Nicole MacDougall	0.2	\$150.00	\$30.00
Keenan Smith	4.7	\$250.00	\$1,175.00
<b>Quantity Total</b>		<b>29.8</b>	
<b>Subtotal</b>			<b>\$11,444.80</b>
<b>Total</b>			<b>\$11,444.80</b>

**Detailed Statement of Account**

**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10962	09/26/2022	\$11,335.26	\$0.00	\$11,335.26
11199	10/07/2022	\$4,336.78	\$0.00	\$4,336.78
11200	11/08/2022	\$16,538.50	\$0.00	\$16,538.50

11637	01/10/2023	\$4,777.50	\$0.00	\$4,777.50
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**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11365	12/01/2022	\$11,444.80	\$0.00	\$11,444.80
<b>Outstanding Balance</b>				<b>\$48,432.84</b>
<b>Total Amount Outstanding</b>				<b>\$48,432.84</b>

**IOLTA Trust Account**

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00
<b>IOLTA Trust Account Balance</b>					<b>\$0.00</b>	

Please make all amounts payable to: Nardella & Nardella, PLLC

**Payment Link:** <https://app.clio.com/link/7TanFHMgYd6d>

Payment is due upon receipt.





# INVOICE

Invoice # 11638  
Date: 01/10/2023

135 W. Central Blvd., Suite 300  
Orlando, Florida 32801

Mark Healy  
841 Prudential Drive  
Jacksonville, FL 32207

## 3101-00003/Healy-Adv. Crystal Cruises, LLC

### Adv. Crystal Cruises, LLC

Date	Time Keeper	Description	Quantity
12/01/2022	KC	Receipt and review of Notice of Appearance; and update service list.	0.10
12/01/2022	PNM	Telephone conference with resort world miami counsel re [REDACTED]	0.40
12/01/2022	PNM	Telephone conference with client re [REDACTED]	0.50
12/01/2022	PNM	Correspondence from and to resorts world miami counsel re [REDACTED]	0.10
12/01/2022	PNM	Reviewing notice of appearance of counsel for resorts world miami	0.10
12/01/2022	PNM	Correspondence to co-counsel re next steps in matter	0.10
12/01/2022	PNM	Reviewing matter status and required next steps in estate administration	0.10
12/02/2022	PNM	Correspondence from and to [REDACTED] re privilege issues	0.10
12/02/2022	PNM	Correspondence from and to resorts world counsel re motion to extend time to respond to complaint	0.10
12/02/2022	PNM	Reviewing motion to extend time to respond to complaint and proposed order granting same	0.20
12/02/2022	PNM	Reviewing silver notice of appearance in resorts world litigation	0.10
12/05/2022	KC	Receipt and review of order granting extension of time to Resorts World; and calendar deadline.	0.10

12/05/2022	PNM	Correspondence from and to [REDACTED] re [REDACTED]	0.10
12/05/2022	PNM	Reviewing matter re order granting motion to extend time to respond to complaint in resorts world matter	0.10
12/05/2022	PNM	Correspondence from ca counsel re c [REDACTED] int against ca landlord	0.10
12/05/2022	PNM	Correspondence from d [REDACTED]	0.10
12/05/2022	PNM	Reviewing revised confidentiality agreement	0.10
12/06/2022	PNM	Reviewing matter re meet and confer requirement on case management deadlines in resorts world litigation	0.10
12/07/2022	MN	Call with [REDACTED]	0.20
12/07/2022	PNM	Reviewing memo from belgium counsel re damage assessment of court surveyor and next steps in litigation	0.30
12/07/2022	PNM	Telephone conference with d [REDACTED] related issues concerning r [REDACTED]	0.50
12/07/2022	PNM	Reviewing strategy for d [REDACTED] [REDACTED] t and related issues	0.40
12/08/2022	PNM	Reviewing matter re wage claim and [REDACTED] objections	0.10
12/08/2022	PNM	Reviewing matter status and organizing next steps in claims review	0.30
12/12/2022	MN	Call regarding claims objection and timing for filing	0.20
12/12/2022	PNM	Reviewing matter re status hearing on pending adversary proceeding	0.10
12/12/2022	PNM	Preparing for and attending client conference re [REDACTED] [REDACTED]	0.90
12/13/2022	KC	Email correspondence with opposing counsel to coordinate mandatory meet and confer.	0.20
12/13/2022	PNM	Reviewing order granting final fee application of phelps dunbar	0.10
12/13/2022	PNM	Correspondence from and to opposing counsel re case management conference	0.10
12/14/2022	PNM	Correspondence from and to opposing counsel re court ordered meet and confer on case management matters	0.10
12/14/2022	PNM	Correspondence from and to judicial assistant re cancellation of case management conference	0.10
12/15/2022	PNM	Preparing for meet and confer for initial case management conference deadlines and reviewing related complex business litigation rules and order	0.60
12/16/2022	PNM	Correspondence to client re [REDACTED] [REDACTED]	0.10
12/16/2022	PNM	Attending required meet and confer with opposing counsel re case management plan and related deadlines	0.60

12/16/2022	PNM	Reviewing order canceling case management conference	0.10
12/19/2022	KC	Receipt and review of Order Cancelling Interim Case Management Conference; and update calendar.	0.10
12/19/2022	PNM	Correspondence from [REDACTED] re [REDACTED]	0.10
12/19/2022	PNM	Reviewing [REDACTED] and preparing memo to file re same	0.40
12/21/2022	KC	Email correspondence with co-counsel re: joint case management report form.	0.10
12/21/2022	PNM	Telephone call from claimant horace	0.10
12/21/2022	PNM	Reviewing matter re deadline to file case management plan	0.10
12/23/2022	PNM	Correspondence from and to [REDACTED] re [REDACTED]	0.10
12/23/2022	PNM	Reviewing order granting phelps dunbar final fee application	0.10
12/23/2022	PNM	Reviewing discovery provided [REDACTED]	0.10
12/23/2022	PNM	Reviewing and organizing voluminous client correspondence and related documents re [REDACTED]	2.60
12/29/2022	PNM	Reviewing kaplan-stien proof of claim	0.10
<b>Quantity Subtotal</b>			<b>11.5</b>

Time Keeper	Quantity	Rate	Total
Paul Mascia	10.5	\$425.00	\$4,462.50
Michael A. Nardella	0.4	\$450.00	\$180.00
Karen Cooper	0.6	\$225.00	\$135.00
<b>Quantity Total</b>			<b>11.5</b>
<b>Subtotal</b>			<b>\$4,777.50</b>
<b>Total</b>			<b>\$4,777.50</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10962	09/26/2022	\$11,335.26	\$0.00	\$11,335.26

11199	10/07/2022	\$4,336.78	\$0.00	\$4,336.78
11200	11/08/2022	\$16,538.50	\$0.00	\$16,538.50
11365	12/01/2022	\$11,444.80	\$0.00	\$11,444.80

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11638	01/10/2023	\$4,777.50	\$0.00	\$4,777.50
			<b>Outstanding Balance</b>	<b>\$48,432.84</b>
			<b>Total Amount Outstanding</b>	<b>\$48,432.84</b>

**IOLTA Trust Account**

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<b>IOLTA Trust Account Balance</b>					<b>\$0.00</b>	

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**Payment Link:** <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

**EXHIBIT 2**  
**(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

To: Assignors,

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

\_\_\_\_\_ /

**ORDER GRANTING MOTION FOR APPROVAL OF FEES AND EXPENSES  
INCURRED BY NARDELLA & NARDELLA, PLLC, AS COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD OF AUGUST 1, 2022 THROUGH DECEMBER 31, 2022**

**THIS CAUSE** came before the Court without a hearing upon the *Motion for Approval of Fees and Expenses Incurred by Nardella & Nardella, PLLC, as Counsel to the Assignee for the Period of 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 Nardella & Nardella, PLLC seeks compensation in the amount of \$47,915.00 and reimbursement of expenses in the amount of \$517.84, for a total interim award of \$48,432.84, for the period of August 1, 2022 through December 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 hereby **GRANTED**.
2. Nardella & Nardella, PLLC, as counsel to the Assignee, is awarded fees in the amount of \$47,915.00 and expenses in the amount of \$517.84, for a total award of \$48,432.84, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Nardella & Nardella, PLLC the sum of \$48,432.84, which is the balance owed.
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 Nardella & Nardella, PLLC 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