

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,	(Jointly Administered Cases)
To:	
MARK C. HEALY,	
Assignee.	

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**NOTICE OF LIS PENDENS**

TO: THE ABOVE-NAMED DEFENDANTS AND  
ALL OTHERS WHOM IT MAY CONCERN:

YOU ARE NOTIFIED OF THE FOLLOWING:

A. Mark C. Healy (the “Assignee”), not individually but solely as Assignee for the benefit of creditors of Crystal Cruises, LLC (“Crystal Cruises” or the “Assignor”), in connection with the above described Assignment for Benefit of Creditors proceeding of the Assignor initiated by the Assignee pursuant to Chapter 727, *Florida Statutes* (the “Assignment Case”), is seeking specific performance of the Sale and Purchase Agreement dated December 17, 2019, executed in favor the Assignor by the owner of the Property described below with respect to said Property (the “Purchase Agreement”).

B. The case number of the Assignment Case is shown in the caption. The Assignment Case is pending in the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida. The clerk's notation of the date of receipt on this notice shall satisfy any requirement that this notice contain the date of the institution of the action.

C. The real property that is the subject matter of this action (the "Property") is in Miami-Dade County, Florida, which Property is more particularly described as follows:

Lots 7, 8 and 9, Block 2 and that portion of Lot 10, Block 2, lying East of Biscayne Boulevard, THE GARDEN OF EDEN, according to the Plat thereof, as recorded in Plat Book 4 at Page 12 of the Public Records of Miami-Dade County, Florida; together with Lots 12, 13 and 14, Block 1, and that portion of Lot 11, Block 1, lying East of Biscayne Boulevard, PERSHING COURT, according to the Plat thereof, as recorded in Plat Book 4 at Page 147 of the Public Records of Miami-Dade County, Florida. LESS that portion lying within the plat of AWANA FOREST, recorded in Plat Book 174, Page 17, public records of Miami Dade County, Florida.

Commonly known as 1401 – 1417 Biscayne Blvd., Miami, FL 33132

Parcel No. 01-3231-012-0050

D. The relief sought by the Plaintiff is for an award of all damages available under the Purchase Agreement, including prejudgment interest and costs, and the imposition of an equitable lien on the Property in accordance with the terms of the Purchase Agreement.

Dated: February 23, 2023

NARDELLA & NARDELLA, PLLC  
*Co-General Counsel for Assignee*  
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By: /s/ Paul N. Mascia

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**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 February 23, 2023, which shall provide notice to all parties that have entered an appearance in this case; via email to and all creditors and interested parties on the e-mail service list pursuant to the Notice Procedures Order; and via email to [cbl44@jud11.flcourts.org](mailto:cbl44@jud11.flcourts.org) pursuant to CBL Rule 2.2.

By: /s/ Paul N. Mascia  
Paul N. Mascia, Esq.