

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.

_____ /

ASSIGNEE'S THIRD OMNIBUS OBJECTION TO CLAIMS

THIS IS AN OBJECTION TO YOUR CLAIM. THE ASSIGNEE IS ASKING THE COURT TO MODIFY OR DISALLOW THE CLAIM THAT YOU FILED IN THIS ASSIGNMENT FOR THE BENEFIT OF CREDITORS CASE. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 TO THIS OBJECTION.

YOU SHOULD IMMEDIATELY CONTACT THE ASSIGNEE'S OFFICE AT CRYSTALCLAIMSOBJ@MOECKER-CRYSTAL.COM TO RESOLVE THE DISPUTE. IF YOU DO CONTACT THE ASSIGNEE'S OFFICE WITHIN 21 DAYS OF SERVICE OF THIS OBJECTION, THE ASSIGNEE AND THE COURT WILL PRESUME THAT YOU DO NOT OPPOSE THE OBJECTION TO YOUR CLAIM, AND YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT FURTHER NOTICE OR A HEARING.

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”), files this omnibus objection to claims (the “Objection”), and in support thereof, states as follows:

BACKGROUND

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 Chapter 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.

RELIEF REQUESTED

2. Section 727.108(10) of the Florida Statutes provides that the Assignee shall “[e]xamine the validity and priority of all claims against the estate.” Furthermore, section 727.113(1) of the Florida Statutes provides that the Assignee “may file with the court an objection to a claim ...”

3. Section 727.109(4) of the Florida Statutes provides that the Court shall have the power to “allow or disallow claims against the estate and determine their priority ...”

4. The Assignee has examined the proofs of claim identified on **Exhibit 1**, and any documentation provided supporting such claims, and has determined that such claims should be modified or disallowed for the reasons set forth on **Exhibit 1**.

5. Accordingly, the Assignee files this Objection seeking to modify or disallow claims as set forth on the attached **Exhibit 1**.

PROCEDURES FOR CONSUMER AND EMPLOYEE CLAIMS OBJECTIONS

6. On February 28, 2023, the Court entered an order approving procedures for filing and resolving objections to consumer and employee claims in the Assignment Cases (the “Claims Procedure Order”).

7. Pursuant to the Claims Procedure Order, if a claimant disputes this Objection to their claim, then within 21 days of service of this Objection, such claimant must contact the Assignee via email at crystalclaimsobj@moecker-crystal.com to attempt to resolve the dispute. If a claimant fails to contact the Assignee within the required time period, the Assignee and the Court will presume that such claimant does not oppose the relief requested in this Objection, and the Assignee may submit an order to the Court sustaining this Objection as it relates to such claimant without any further notice or hearing. Upon entry, the Assignee will serve such order upon the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

8. Pursuant to the Claims Procedure Order, if a claimant contacts the Assignee within the required time period, and thereafter, the Assignee determines that the Assignee and the claimant are unable to resolve the dispute, the Assignee may file a Notice of Impasse with the Court identifying the unresolved claim. The Notice of Impasse will be served by the Assignee on

the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

9. Pursuant to the Claims Procedure Order, following the filing of a Notice of Impasse by the Assignee, the claimant must file with the Court a written response to this Objection within 21 days (a “Response”). If the claimant fails to file the Response with the Court within the required 21-day period, the Assignee and the Court will presume that such claimant does not oppose the relief requested in this Objection, and the Assignee may submit an order to the Court sustaining this Objection as it relates to such claimant without any further notice or hearing. Upon entry, the Assignee will serve such order upon the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

10. Pursuant to the Claims Procedure Order, a Response must be timely filed with the Court and include:

- a. a statement setting forth the particular Objection (*e.g.*, the Assignee’s *First* Omnibus Objection to Claims or the Assignee’s *Fifth* Omnibus Objection to Claims) and the particular claim(s) to which the Response is directed, including the claim number;
- b. a concise statement setting forth the reasons why the Court should not grant the Objection with respect to such claim, including the factual and legal bases upon which the claimant relies in opposing the Objection;
- c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the Objection, provided that confidential, proprietary, or otherwise protected information should not be publicly filed with the Court, but the existence of such information should be disclosed to counsel for the Assignee; and
- d. the name, address, telephone number, and email address of the responding claimant and/or the name, address, telephone number, and email address of the claimant’s attorney or designated representative

11. If a claimant files a Response within the required time period, the Assignee, in the Assignee's sole discretion, may set the matter for a preliminary non-evidentiary hearing. The Assignee may set multiple claims objections to be heard in a single preliminary non-evidentiary hearing.

12. The Assignee shall be permitted to file a reply to any Response no later than 2 calendar days before the preliminary non-evidentiary hearing with respect to the relevant Objection. No sur-reply shall be permitted absent prior Court approval.

13. If the matter is not resolved at the preliminary non-evidentiary hearing, the Assignee and the claimant shall make a further attempt to resolve the matter. Thereafter, if the matter remains unresolved, the Assignee, in the Assignee's sole discretion, may set the matter for evidentiary hearing.

14. The Assignee may, in his sole discretion and in accordance with other orders of the Court, settle the validity, priority, amount, nature, or extent of contested claims without any further notice, order, or approval of the Court

15. Pursuant to the Claims Procedure Order, if allowed, the first \$10,000 of an employee claim will be deemed a priority claim pursuant to Fla. Stat. § 727.114(d) without further notice, order, or approval of the Court, and the balance of any such claim will be deemed a general unsecured claim pursuant to Fla. Stat. § 727.114(f).

16. Pursuant to the Claims Procedure Order, if allowed, the first \$2,225 of a consumer claim will be deemed a priority claim pursuant to Fla. Stat. § 727.114(e) without further notice, order, or approval of the Court, and the balance of any such claim will be deemed a general unsecured claim pursuant to Fla. Stat. § 727.114(f).

17. The Assignee reserves all rights to amend and supplement this Objection and file further objections.

WHEREFORE, the Assignee respectfully requests that the Court enter an order sustaining this Objection, granting the relief requested herein, and granting any other relief the Court deems just and proper.

Dated: March 15, 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 March 15, 2023 to all parties that have entered an appearance in this case; and via email to all claimants listed on the attached **Exhibit 1** pursuant to the Claims Procedure Order.

By: /s/ Samuel J. Capuano
Samuel J. Capuano

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.03-02C	Alan & Elizabeth Ratliff	C5909	\$ 1,078.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alan & Kate Ruley	C895	\$ 1,870.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alan & Marilyn Rose	C3182	\$ 1,758.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alan Adelman	C2467	\$ 15,246.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alan C Blunt	C1439	\$ 1,307.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Albert & Susan Kinal	C5653	\$ 5,548.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Albert Kowalak & John Turner Jr	C8717	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alejandro Herrera	C1164	\$ 5,228.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alexander Bibicheff	C6898	\$ 1,934.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alexander Pawlicki	C9468	\$ 953.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alice Wong	C7551	\$ 1,245.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Alison & James McCormick	C2223	\$ 15,638.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Allen D Mincho	C1832	\$ 164,544.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Allison Jennings	C8903	\$ 6,514.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amanda Harris & John Holdgen	C10963	\$ 1,750.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amenda Jensen	C7637	\$ 9,250.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amenda Jensen	C7638	\$ 13,896.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amy Albert	C5104	\$ 3,709.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amy Ellis & Tommy Smith	C2055	\$ 1,847.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Amy NG	C2570	\$ 945.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Andrew & Arlene Wong	C2575	\$ 3,029.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Andrew Kaplan & Allison Wright	C6926	\$ 4,136.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Andrew Taylor & Pua Chai Hong	C9827	\$ 1,517.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.03-02C	Andrew V Slucky	C6363	\$ 5,894.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Anita Chien	C9762	\$ 920.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Ann Laychak	C3274	\$ 2,144.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Ann M Miles & John Cabuena	C2117	\$ 12,008.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Anna Franco & Mark Gregory	C6453	\$ 8,697.54	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Annette Pintado	C9884	\$ 1,015.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Anthony Demattei	C3320	\$ 1,827.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arie Bahnout	C2861	\$ 1,438.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arlene A Platt	C2281	\$ 903.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arnold & Janice Malcolm	C10243	\$ 64,131.08	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arnold Grant	C3375	\$ 15,148.04	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arnold Malcolm	C9780	\$ 2,101.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Arthur & Sharon Chambers	C6499	\$ 1,129.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Aubrey Don Knudsen	C9798	\$ 1,471.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara & John Gontrum	C8640	\$ 1,685.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Ann Menton Kapell	C3834	\$ 889.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Condra	C7897	\$ 3,845.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Da Silva-Tillmann	C2542	\$ 17,186.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara G Hoffman	C1147	\$ 8,088.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Gardner Anderson	C5076	\$ 1,906.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Gontrum	C8641	\$ 1,149.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barbara Zdon Proal & Cheri Perez	C3707	\$ 821.25	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Barry & Allyn Shulman	C2521	\$ 69,752.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -

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REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.03-02C	Bella Whelan	C10364	\$ 2,420.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bennet Beinfest	C1337	\$ 1,919.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bennett Hsu & Grace Yueh Hsu	C2942	\$ 920.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bernard Manuel	C5261	\$ 2,258.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Beverly & C Robert Gackenbach	C1127	\$ 1,259.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	BI-HSIA HUANG	C4943	\$ 6,247.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bonnie & Corydon A Pearson	C1057	\$ 2,690.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bonnie Chan	C11604	\$ 555.52	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bonnie Tucker	C1212	\$ 851.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bradley Reed	C6687	\$ 5,097.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bradley Sherman	C9444	\$ 14,700.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brenda & Johnny Miller	C1556	\$ 2,386.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brett Dock	C7922	\$ 4,011.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brian Krueger	C5201	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brian Mercer	C5619	\$ 2,095.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brian Rabbitt	C11002	\$ 1,904.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brian Tidrick	C6910	\$ 1,437.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Brit Probst	C8588	\$ 4,715.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bruce F. Turner	C3061	\$ 1,944.78	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bruce Nolte & Josey Nolte	C2046	\$ 1,188.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Bruce Nolte & Josey Nolte	C3143	\$ 1,498.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Candice D Andrew Kuo	C6403	\$ 1,828.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Candice Saka	C467	\$ 4,963.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.03-02C	Carlos Gonzalez-Garza	C9821	\$ 1,333.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carlynn & Lindsey Hicks	C1390	\$ 25,974.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carol & Soamers Summerhays	C3036	\$ 1,498.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carol L. Lambert	C7410	\$ 656.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carol Lopilato	C2282	\$ 2,491.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carol Trueheart & Joshua Trueheart	C3537	\$ 2,796.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carole Hoeger	C3567	\$ 1,349.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carole McDonald	C9632	\$ 1,079.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carole Moosa	C6716	\$ 1,840.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Caroline & Vann Russell	C3829	\$ 1,863.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Carolyn Taff	C10758	\$ 5,656.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Catharine Tierney	C796	\$ 1,169.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Clyde Randall Shake	C9701	\$ 3,581.86	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	DAVID & ANITA BARNES	C5161	\$ 4,228.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	George & Ann Arnold	C2039	\$ 3,552.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Jason Lee Greene & Melinda Frost-Greene	C9779	\$ 1,393.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Jeffrey & Kimberly Cross	C6305	\$ 4,742.44	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	John Currie	C5496	\$ 1,848.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Jorge B Krimer	C1172	\$ 2,899.06	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Joseph Britton Radford	C4933	\$ 1,471.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Judith L Nelson	C3645	\$ 5,039.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Jurgen Weyand	C6843	\$ 8,933.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Kenneth & Barbara Minihan	C10930	\$ 5,005.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.03-02C	Linda F & Stanley L Blend	C1295	\$ 5,059.02	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Margot Golding & Michael Powers	C9658	\$ 5,548.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Michael S Loden	C2836	\$ 13,888.44	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Mr LAM, Henry Man Kwong, Ms. CHEE & Lucy	C7514	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Robert J Sr & Lucille Conley Rodwich	C7388	\$ 8,240.88	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	SHANG BIN LU	C6610	\$ 2,026.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Thomas , Laura & James Williams	C6488	\$ 2,473.43	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -
OOBJ23.03-02C	Wai King Monita Liu	C3432	\$ 946.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$ -