

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 NINTH 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](mailto: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](mailto: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: April 10, 2023.

BERGER SINGERMAN LLP  
*Co-Counsel for Assignee*  
1450 Brickell Avenue, Suite 1900  
Miami, FL 33131  
Telephone: (305) 755-9500  
Facsimile: (305) 714-4340

By: /s/ Samuel J. Capuano  
Paul Steven Singerman  
Florida Bar No. 378860  
[singerman@bergersingerman.com](mailto:singerman@bergersingerman.com)  
Samuel J. Capuano  
Florida Bar No. 90946  
[scapuano@bergersingerman.com](mailto:scapuano@bergersingerman.com)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on April 10, 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
OOBJ23.04-01C	Alvin & Karyn Unger	C7744	\$ 1,814.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Azman Lim & Victor Lim Kok Eow	C10797	\$ 6,552.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Beverly Enewold	C3651	\$ 5,136.45	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Cory Unger & Alicia Unger	C7747	\$ 1,379.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Cristina Patricia Fong	C4171	\$ 874.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Dalany Unger	C7750	\$ 1,424.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	David & Cheryl Bieber	C7482	\$ 6,801.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Elaine Hepburn	C3802	\$ 7,308.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Eric tang & Janet May Tang	C4031	\$ 1,048.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	FRANK TONIN	C11020	\$ 613.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Ivan Deibert & Cecile Deibert	C940	\$ 1,318.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	James Biddlecombe	C7748	\$ 1,912.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Joan Davis	C7348	\$ 22,205.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	John D Herrick	C304	\$ 5,225.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Karen & Stuart Morgan	C9963	\$ 1,817.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Leisa & Kate Makin	C9398	\$ 1,578.82	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Lillian & Kwok keung Chung	C2569	\$ 1,531.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Linda Ciszek	C568	\$ 6,302.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Lorne A Culley	C7822	\$ 1,205.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	McKenna Unger	C7749	\$ 953.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Michael T Rylah	C710	\$ 11,012.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Michele Parker	C10933	\$ 15,477.68	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Nixon & Boston Unger	C7746	\$ 1,379.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

**EXHIBIT 1**

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-01C	Paola Biagi	C9234	\$ 631.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Paul Unger & Cheryl Unger	C7745	\$ 1,439.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Priscilla Chan & Rodic Chan	C2562	\$ 1,936.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Priscilla Maningo	C908	\$ 364.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Rebecca A. Yoch	C10193	\$ 4,428.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Rebecca A. Yoch	C10194	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Richard Lefebvre	C6786	\$ 3,859.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Richard Lefebvre	C6787	\$ 11,204.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Richard S Basuk	C367	\$ 4,786.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	RITA LAI PING LEUNG	C6256	\$ 582.15	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Robert & Frances Donlan	C2743	\$ 6,951.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	ROBERT BEAN	C11215	\$ 15,107.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Robert Cuccias	C4637	\$ 13,322.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Robert Mankey & Holly Mankey	C1052	\$ 1,481.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Robyn C Hutchinson	C854	\$ 9,074.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Robyn C Hutchinson	C855	\$ 1,466.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	RON BERGER	C104	\$ 6,992.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Russell Knox & Gina Knox	C276	\$ 8,530.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sam Soontung Hsieh	C1938	\$ 2,087.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sampson Lung	C9470	\$ 1,706.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sandra & Gail Mulhollam	C6394	\$ 1,246.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sandra Rosen & Leonard Adams	C8378	\$ 1,744.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sandy Ira Allan Bigman	C911	\$ 2,552.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00



**EXHIBIT 1**

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-01C	Scott J Uroff	C1828	\$ 15,156.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Scott J Uroff	C1829	\$ 14,498.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Scott Prince	C9246	\$ 1,471.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Se Yao Hsu	C6728	\$ 920.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	SHANG BIN LU	C6611	\$ 2,026.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	SHANG BIN LU	C6619	\$ 2,026.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	SHANG BIN LU	C6608	\$ 2,026.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Shari Westerfield	C5853	\$ 12,020.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sharlene Garish	C1966	\$ 1,070.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sharon Kinkaid	C1440	\$ 6,028.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sheree Tai	C3583	\$ 455.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sheryl Lynn Stephens	C6399	\$ 1,548.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Shinlei Schlaff	C7226	\$ 2,162.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Shirley Tan	C1776	\$ 965.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Shui & Po Ching Lee	C6905	\$ 1,363.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sik Kwan Fung	C6582	\$ 6,944.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sir Brian Keith	C2654	\$ 11,338.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stanley & Linda F Blend	C1296	\$ 10,416.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephanie & George Erbrecht	C1713	\$ 13,894.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephanie Splane	C1204	\$ 2,872.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephen Brener	C3215	\$ 2,504.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephen Moore	C5430	\$ 1,656.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephen Parker	C10932	\$ 15,477.68	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

**EXHIBIT 1**

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-01C	Stephen Pennell	C2146	\$ 383.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephen Pennell	C2147	\$ 13,165.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Stephen Pennell	C2148	\$ 1,890.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Steve T. & Grace L. Chin	C3248	\$ 9,387.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Steve T. & Grace L. Chin	C3249	\$ 1,623.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Steve T. & Grace L. Chin	C3250	\$ 2,102.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Steve T. & Grace L. Chin	C3251	\$ 1,539.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Steve T. & Grace L. Chin	C3252	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Sundararajann & Rema Dhamotharan	C205	\$ 4,582.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Susan Angel	C6017	\$ 642.82	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Susan Angel	C6018	\$ 300.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Susan Johnson	C10906	\$ 27,904.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Theresa Mon Lee	C1964	\$ 721.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Thomas L Houts	C4479	\$ 400.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Thomas Peterson	C2134	\$ 4,947.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Thomas Tescri	C3064	\$ 1,642.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Timothy M Stull & Michele D Stull	C160	\$ 23,439.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Tommy Wing Keung Tao & Marian Leung	C8537	\$ 1,086.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Virginia Castellano	C9097	\$ 616.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Warren E. Stinson	C3043	\$ 869.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	William & Betty Schultz	C10063	\$ 8,642.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	William & Betty Schultz	C10064	\$ 35,564.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	William Carpenter	C6741	\$ 2,301.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

**EXHIBIT 1**

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-01C	William Gendron	C6799	\$ 29,189.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	William Kleinhofer	C7098	\$ 15,250.26	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	William Kleinhofer	C7099	\$ 10,932.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Yasmin Rahmani-Dugan	C3194	\$ 12,800.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Yin Mai Lo	C10667	\$ 721.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Yuk Chun Maria Hon	C8714	\$ 354.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Yuk Hing Leung & Miranda Tsang	C1595	\$ 1,591.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-01C	Zeev & Cohava Zahavi	C2236	\$ 984.52	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00