

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 ELEVENTH 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: April 13, 2023.

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

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on April 13, 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
OOBJ23.04-03C	Alejandro Arze	C9127	\$ 6,709.92	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Amelia Ma	C9852	\$ 1,391.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Andrea Amram	C9804	\$ 22,326.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Andrew & Catherine Dembosky	C4590	\$ 10,747.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Annalisa Frost	C9534	\$ 777.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Ashley MacLaughlin & Paula Nichols	C3767	\$ 3,794.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Barbara Trotter	C4154	\$ 795.25	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Brett Dock	C8961	\$ 15,052.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Brian Kluff	C4900	\$ 5,500.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Brian Treharne	C7650	\$ 6,800.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Bryan Edenfield	C9363	\$ 1,274.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Carol Waterfield	C7770	\$ 1,848.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Celestino Suppo	C9121	\$ 2,227.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Chiaki Moore	C9162	\$ 2,159.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Chitralada Kaljaruek	C4399	\$ 5,834.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Christopher Hawks & Jennifer Nelson-Hawks	C9355	\$ 1,788.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	CRISTIAN FABRES	C9123	\$ 7,502.46	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Cutberto Garza	C9282	\$ 2,537.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Dale Gillespie & Dianne Gillespie	C9451	\$ 171,458.53	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Daniel Lopez Suarez	C9678	\$ 3,771.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	David Jenkins	C9020	\$ 18,360.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Debbie Greenberg	C9399	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Debora D Wilemon & William Wilemon	C1666	\$ 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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-03C	Donald & Linda Cornish	C2110	\$ 29,713.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Donald Gordon	C9572	\$ 13,842.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Donald M Mailliard	C313	\$ 25,896.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	DOUGLAS & LORRAINE SOUSA-MCMILLEN	C058	\$ 10,799.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	DOUGLAS DECAMP	C024	\$ 49,614.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Douglas Smiley & Wendy Smiley	C4159	\$ 1,728.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Dr Denise Casey	C1470	\$ 49,465.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Elena Kamenetski	C10781	\$ 3,138.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Eric Davignon	C5753	\$ 6,168.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Eugene Ching Chung Chan	C9228	\$ 1,604.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Eugene Kalok & Jessica Ka Bo Tang	C4032	\$ 1,138.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Felix Llibre	C7753	\$ 10,542.28	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Frederic Marguerre	C7367	\$ 28,963.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	GAYLORD MEROW	C001	\$ 155,647.84	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	George Fischer	C9581	\$ 2,282.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Glory Westwell	C4156	\$ 781.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Herbert BETSCHAT	C10029	\$ 6,795.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	James Warren Hodges & Elaine Marie Hodges	C2964	\$ 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
OOBJ23.04-03C	Jean Lepage	C9651	\$ 1,426.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Jenna Hardy	C9867	\$ 3,539.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	John Choi & Connie Choi	C2561	\$ 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
OOBJ23.04-03C	Julia Simpson	C3481	\$ 13,708.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Karla Wong	C11242	\$ 3,519.50	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
OOBJ23.04-03C	Katherine Mccolm	C9445	\$ 2,492.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Kathryn A Lyne	C9142	\$ 3,765.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Kathryn A Lyne	C9143	\$ 1,746.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	KENNETH IRVIN SEGEL	C003	\$ 2,123.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	KRISTIE TU	C5034	\$ 1,320.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	MARCIA BERRYMAN	C4808	\$ 1,030.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Marilyn Florin	C7401	\$ 11,165.05	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Marine Andonian	C11260	\$ 9,118.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Marjorie Axelrod-Calister	C9368	\$ 2,487.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	MARK & SARAH HAMPTON	C102	\$ 3,208.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Mark Matthes	C6140	\$ 9,724.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Martha J Pelton	C327	\$ 8,812.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Maryann Rosher	C2259	\$ 1,431.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Maxine Kane	C6656	\$ 34,174.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Melinda Azar	C4134	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Michael Alan Creighton	C10960	\$ 1,270.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Michael David Meyer	C4093	\$ 28,450.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Monica Tsang Ng	C9689	\$ 630.15	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Nanette & Steven Dwoskin	C9714	\$ 4,405.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Nicholas & Jo Wilson	C8132	\$ 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
OOBJ23.04-03C	Nicky Otts	C526	\$ 12,578.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Patricia A Deutsche	C460	\$ 5,692.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Patrick & Lee-Ann Knight	C10248	\$ 1,173.00	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
OOBJ23.04-03C	Paul Cater	C10816	\$ 2,990.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Paul Feldkamp	C9817	\$ 5,103.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Paul Neff	C9648	\$ 2,884.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Rachel Marks	C9529	\$ 4,251.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Raymond P. Moore	C3290	\$ 18,091.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	REX PETERSON & TINA PETERSON	C068	\$ 2,444.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Richard D & Janice K Macaulay	C3288	\$ 43,368.99	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Richard Rivera	C9415	\$ 4,739.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Richard Spenceley	C9133	\$ 2,128.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Robert & Deborah Neidermire	C9170	\$ 2,047.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Robert Moss	C5546	\$ 87,011.46	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Robert Rosenberg	C172	\$ 9,663.38	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Roger & Pamela Kumlien, Robert Neidermire	C9166	\$ 1,088.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Roy Boggs	C9187	\$ 20,636.89	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sandal Aronson	C9349	\$ 1,123.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sandal Aronson	C9350	\$ 889.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sandra G Gelso	C2536	\$ 14,818.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sandra Johnson	C530	\$ 8,431.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sandra Neal & Heather Bronson	C2402	\$ 1,129.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Sarah E Ball	C877	\$ 724.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Stephen Pennell	C2145	\$ 13,642.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Susan Hollingbery	C9611	\$ 10,178.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Susan Rennie	C1349	\$ 1,482.90	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
OOBJ23.04-03C	Thomas Gotlund	C6987	\$ 15,070.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Toshiko & Tokiko Suzuki	C8685	\$ 7,198.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Tracy Lee Zeiler	C2797	\$ 2,012.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Vadim Mostovoy	C9848	\$ 500.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Vladimir Leshinsky	C3766	\$ 9,748.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Wendell M Coslett	C7667	\$ 5,425.71	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	Wendy Neumann	C1315	\$ 763.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-03C	William P. Surplus	C5331	\$ 11,062.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00