

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 FOURTEENTH 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 17, 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 17, 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 | REASONS FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|--------------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-06C | Aditi Sanatinia | C5002 | \$ 6,457.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Alan H. Lubitz & Patricia A. Rathgeb | C8012 | \$ 2,132.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Amanda Lee Wei Khoon | C6441 | \$ 965.85 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Beckie Yon & Mary Jayne Parker | C8812 | \$ 27,459.36 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Benjamin Bock | C6142 | \$ 10,154.25 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Brent Parker | C5194 | \$ 4,583.10 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Brenton Macgregor | C8565 | \$ 2,188.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Brian C. Lunsford | C6868 | \$ 2,864.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Bruce & Patrice Mackie | C8716 | \$ 2,241.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Bruce Mackie | C8050 | \$ 3,336.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Bruce Mackie | C8639 | \$ 2,797.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Carol Harris | C6255 | \$ 3,292.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Carolyn Doyle Brown | C7361 | \$ 861.15 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Cathy Ostroff | C4644 | \$ 2,567.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Charlotte Day & Frank Smith III | C6136 | \$ 9,358.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | CHI YANG CHOW | C7116 | \$ 1,262.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Daniel & Katherine Tortorici | C8755 | \$ 6,868.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Daniel & Katherine Tortorici | C8756 | \$ 881.85 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Darryl Dalcin | C7970 | \$ 7,704.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | David & Michelle Treloar | C5244 | \$ 8,566.80 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | David Mossy | C7124 | \$ 7,098.60 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Deborah Manzano | C7507 | \$ 2,866.05 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Diana Millock | C5223 | \$ 17,827.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |

EXHIBIT 1

| REFERENCE | CLAIMANT NAME(S) | CLAIM NUMBER | SUBMITTED CLAIM AMOUNT | REASON FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|--|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-06C | Donald Reid | C5827 | \$ 8,566.80 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Dwayne & Heather Teeter | C8945 | \$ 500.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Eliot & Doris Kushner | C6523 | \$ 1,902.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Elisabet Pappas | C5079 | \$ 1,204.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Elizabeth Jacobson | C4954 | \$ 21,318.06 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Finis & Charlotte Teeter | C8944 | \$ 500.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | FRED CHARLES MAY & LINDA ANN MAY | C070 | \$ 173,077.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Gayle Patricia West & Jeffrey David West | C7351 | \$ 1,525.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | George & Betty Torney | C8197 | \$ 3,685.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Girish & Vrushali Daulat | C8874 | \$ 6,457.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Gloria Mae Levin | C5358 | \$ 2,324.07 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Guido & Erina Verhoek | C8811 | \$ 22,102.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | James & Betsy Fowler | C6473 | \$ 33,995.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jeanne Janson | C5722 | \$ 200.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jeanne Janson | C5723 | \$ 2,946.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jeffrey Cutner | C4774 | \$ 6,004.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | John & Jacalyn Clayton | C7406 | \$ 1,877.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | John Inskeep & Michael Lewis | C8664 | \$ 2,796.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | John Lagomarsino | C6851 | \$ 131,996.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | JOHN SEELEY BOOTH | C6269 | \$ 4,600.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jonathan Hecker | C5237 | \$ 1,561.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jorge Zablah Touche | C6156 | \$ 6,823.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Joseph John Colella Jr | C8076 | \$ 2,457.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |

EXHIBIT 1

| REFERENCE | CLAIMANT NAME(S) | CLAIM NUMBER | SUBMITTED CLAIM AMOUNT | REASON FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|-----------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-06C | Joseph Loonan | C8151 | \$ 1,395.25 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Joseph Schuller | C7644 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Julian Ventosa & Ma Del Ortiz | C4945 | \$ 1,710.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | June Hellman | C6622 | \$ 100.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | June Hellman | C6624 | \$ 300.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Jurate Zibas | C8218 | \$ 603.60 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Karen Kwilosz | C6595 | \$ 1,587.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Kenwood Youmans | C4994 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Kin Kwok Chan & Ellen Wai Ling Lo | C7187 | \$ 6,160.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Laurie & Ronald Schacht | C5166 | \$ 3,824.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Lawrence & Esther Thal | C7487 | \$ 7,759.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Leah Aldridge | C6224 | \$ 2,147.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Leslie Hutchison | C6524 | \$ 2,703.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Linda Lavelle | C7509 | \$ 1,259.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Linda Mcclintock | C7232 | \$ 4,283.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Lisa & Katherine Mallady | C6511 | \$ 6,042.28 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Lisa Mion & Lisa Shasky | C8962 | \$ 8,161.36 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Lutz Ecker | C8799 | \$ 28,256.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Malcolm & Karen Barham | C8915 | \$ 4,845.78 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Marilyn Steisel | C7818 | \$ 1,165.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Marlisa Ferlet | C6884 | \$ 2,497.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Mary Ellen Leggio | C8121 | \$ 27,385.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Megan Pogue | C6494 | \$ 3,952.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |

EXHIBIT 1

| REFERENCE | CLAIMANT NAME(S) | CLAIM NUMBER | SUBMITTED CLAIM AMOUNT | REASON FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|-------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-06C | Melissa & William Henry | C8684 | \$ 3,122.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Michael Gibson | C6939 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Ming Chou Wong | C6937 | \$ 3,200.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Mishi Hosono | C4835 | \$ 913.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Ms Hong Pan | C5272 | \$ 100.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | NANCY & JACK ROZANCE | C5087 | \$ 6,904.80 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Naoyuki Saito | C6684 | \$ 200.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Patricia Gross & Thomas Quinn | C8632 | \$ 3,780.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Patrick & Gayle McCann | C4805 | \$ 1,920.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Peter & Julia Glass | C8153 | \$ 5,549.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Rebecca J. Singer | C8109 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Ricardo & Lisa Carvalho | C6746 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Richard & Linda Schatz | C6817 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Robert & Patricia Bacon | C6496 | \$ 3,029.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Robert & Wendie Lash | C5362 | \$ 1,157.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Robert McKimm | C5333 | \$ 3,938.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Robert McKimm | C5334 | \$ 9,335.25 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Robert W Solit | C4985 | \$ 3,839.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Ronald Besse | C4585 | \$ 2,448.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Ronald Stephany | C5757 | \$ 1,636.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Samuel & Samantha Sweet | C6322 | \$ 11,328.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Sandor & Delise Bondorowsky | C5473 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Stephen Horton | C6592 | \$ 2,352.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | 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 |
|---------------|----------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-06C | Stuart & Mary Shrode | C5269 | \$ 1,894.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Toh Sheng Lee & Meili Audrey Ngo | C6934 | \$ 1,887.60 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Tore & Mona Steen | C8924 | \$ 3,590.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Wayne G. Wojda | C8115 | \$ 4,100.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | William Fu | C5271 | \$ 100.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | WING YAN NG | C8667 | \$ 1,262.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Yuen Kwan Wong | C8666 | \$ 1,262.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-06C | Yuki Watanabe | C7788 | \$ 1,034.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |