

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 THIRTEENTH 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
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By: /s/ Samuel J. Capuano
Paul Steven Singerman
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Samuel J. Capuano
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on 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
OOBJ23.04-05C	Andrea Girton	C2516	\$ 2,586.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Anita G Zucker	C2850	\$ 3,207.54	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Anita Ya Gjian	C3785	\$ 11,701.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Ann P. Carr	C3009	\$ 2,051.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Anne & Edward Armfield	C2208	\$ 8,004.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Annette L Broatch	C3608	\$ 13,379.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Anthony & Susan Roberta Pitale	C2319	\$ 2,258.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Bruce & Jacylnn Morris	C2277	\$ 10,436.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Byron Scott Anderson	C2210	\$ 1,932.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Candy Habich & Geoffrey Dougal	C3335	\$ 6,954.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Carl & Tony Welch	C4548	\$ 11,066.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Charles Robert Murray	C2694	\$ 1,499.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Charles Yeh & Susan Yeh	C4098	\$ 2,890.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Christine Lynch	C3083	\$ 1,260.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Coral & Frederick Chan	C3427	\$ 2,298.15	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	David & Denise A Mokotoff	C3294	\$ 3,059.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	David & Ellen K Regan	C4565	\$ 700.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	David & Marcia Smith	C2132	\$ 21,582.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	David K Lamb	C4136	\$ 20,871.38	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	David Kusisto & Belinda Zuhlke Kusisto	C4195	\$ 6,019.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Deborah & Douglas Kahn	C3636	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Deborah & Douglas Kahn	C3638	\$ 3,367.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Doreen A Gaul	C3953	\$ 2,412.45	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
OOBJ23.04-05C	Douglas & Robin Ebenstein	C3351	\$ 25,955.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Eddy Pearson	C3170	\$ 22,029.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Edward A. Bott	C3211	\$ 1,781.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Eileen Meighan	C4196	\$ 697.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Elaine & Paul Martinkovic	C2090	\$ 2,411.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Francis E. Xavier	C3126	\$ 3,752.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Gary & Janice Jobson	C3075	\$ 17,000.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	George & Kathleen Buchan	C3992	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	George Malan	C4054	\$ 3,602.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Gerald Paul & Teri Paul	C2808	\$ 2,285.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Glenn Phillip Hogan	C2668	\$ 4,808.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Gregory J Mack & Rosemary Testa-Mack	C4000	\$ 17,192.62	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Henry Perry	C2977	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	J Douglas Rippeto	C3472	\$ 25,162.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Jacqueline Berryman	C3319	\$ 1,323.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	James Solar & Ann Moxley	C3321	\$ 1,896.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Janet & Michael Reyes	C2444	\$ 1,451.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Janice & James McNally	C4571	\$ 1,754.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Jayne Butlein	C2273	\$ 616.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	JOGN WINDOLF	C2221	\$ 20,533.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John & Joann Dell'Olio	C2098	\$ 9,061.08	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John & Linda Macaskill	C3135	\$ 4,075.97	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John D. Routh	C3177	\$ 3,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

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REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	REASONS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
OOBJ23.04-05C	John N Coquillard	C4494	\$ 1,426.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John Ralph Broadwater	C2527	\$ 2,147.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John Tsui & Stephen Male	C2502	\$ 2,522.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	John Tsui & Stephen Male	C2508	\$ 2,170.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Karen Anderson	C2941	\$ 11,172.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Kaveepan Eiamsakulrat	C4060	\$ 4,874.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Ken Goldhoff	C2330	\$ 1,274.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Kenwood C Youmans	C3582	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Kevin & Anne Kelly	C3266	\$ 10,880.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Leonore J Lang	C3935	\$ 1,475.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Leslie B Deland	C3026	\$ 6,046.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Mara Subotovsky De Gotz	C4236	\$ 32,344.45	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Marcia A Brooks Pooler & Gregg Pooler	C3759	\$ 3,749.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Michael & Barbara Klein	C2128	\$ 2,344.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Michael & Katherine Ker	C2587	\$ 5,495.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Mihoko Strong	C3147	\$ 14,214.45	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Mitchell Shanley McCaffrey	C4004	\$ 2,740.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Nadia Rodberg MD	C3186	\$ 3,541.65	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Nance Di Rocco	C3340	\$ 616.35	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Nancy J. Johnson	C3077	\$ 8,208.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Natalie W Yount	C2354	\$ 3,134.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Natiman & Alton Todd	C2227	\$ 7,715.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Nelson M. Hagan Jr.	C3073	\$ 7,476.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

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O OBJ23.04-05C	Nicholas G Paleologos	C3587	\$ 1,932.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Nina Reeves	C2546	\$ 2,116.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Noreen Deegan	C3082	\$ 4,600.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Patricia Irene Chotin	C3228	\$ 13,437.45	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Paul A Church	C2317	\$ 1,757.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Paula Devansky	C2212	\$ 2,743.19	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Peter J Rail	C4241	\$ 1,932.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Philip & Mary Lou Rudolph	C4511	\$ 3,697.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Ral West & John Hardwick	C2875	\$ 16,139.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Raymond Le Clair	C4120	\$ 5,856.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Richard Kaufman & Adrienne Kaufman	C3569	\$ 133,062.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Richard Maia	C2369	\$ 1,682.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Robert & Frances Donlan	C2742	\$ 2,070.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Robert D Martin	C4465	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Robert S Mills	C4290	\$ 21,592.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Roderick & Barbara Brown	C4581	\$ 4,191.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Ronald Shazer	C2870	\$ 1,870.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Ronald Yeager	C3127	\$ 1,664.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Roy & Ka Lai L Claudio	C4567	\$ 1,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Samuel Nun, MD	C3161	\$ 30,012.28	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Sandra & Kurt Niedertluecke	C4406	\$ 1,466.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Sendy Nang & Linda Yee Leung	C2566	\$ 1,936.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
O OBJ23.04-05C	Sharon Johnson	C3076	\$ 3,460.00	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
OOBJ23.04-05C	Shirley Henderson Brown	C2996	\$ 18,347.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Stephen & Mary N Drotleff	C4063	\$ 6,450.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Stephen A. Brown	C3210	\$ 11,935.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Stephen Joel Fein	C3367	\$ 3,989.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Steve & Melanie Stringfellow	C2302	\$ 4,428.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Susan Kahn	C2696	\$ 2,532.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Susan M Dupont	C3955	\$ 11,935.95	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
OOBJ23.04-05C	Ursula Hume	C2380	\$ 779.25	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS)	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00