

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 TWELFTH 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 |
|---------------|--------------------------------|--------------|------------------------|--|--------------------------------------|-------------------------|
| OOBJ23.04-04C | Alan N Kessler | C233 | \$ 2,148.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ana Maria & James Miles | C2017 | \$ 3,705.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Andrew Randall | C274 | \$ 11,456.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Andrew Randall | C275 | \$ 34,291.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Arlene Patterson | C827 | \$ 703.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ayako Takahashi | C1058 | \$ 4,057.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Cambria B Henry | C1384 | \$ 1,471.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Candace Holthouse | C1002 | \$ 14,970.30 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Carmen Aybar | C438 | \$ 6,792.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Catherine & Bernard L Schaefer | C225 | \$ 5,577.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Claude Ralph Fontaine Jr | C1318 | \$ 1,379.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Daniel & Susan Childers | C1029 | \$ 2,578.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | David & Carol G Hayes | C597 | \$ 3,555.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | David & Kimberly Chapman | C10640 | \$ 11,894.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES. | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | David & Kimberly Chapman | C10641 | \$ 9,806.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES. PART OF THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | David & Kimberly Chapman | C10642 | \$ 1,843.28 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES. PART OF THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | David Todd | C1784 | \$ 2,107.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Deborah H Wilkins | C949 | \$ 1,759.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Deborah M Tibbetts-Tumiel | C579 | \$ 938.85 | 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 | REASONS FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|----------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-04C | Dennis Andrus Jr. | C663 | \$ 1,024.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Diana Henderson & Gary Henderson | C1110 | \$ 15,580.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Donald A Meyer | C941 | \$ 17,190.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ellen & Joel Frankel | C231 | \$ 9,788.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ellen & Ken Landis | C1809 | \$ 2,970.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ellen & Ken Landis | C1813 | \$ 12,136.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Foster North & Jill Wolfe | C1114 | \$ 6,665.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Frank S Hawks | C535 | \$ 2,357.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Frank S Hawks | C536 | \$ 2,689.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Hallmark | C1782 | \$ 1,920.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Henry & Suzanne Grant | C1488 | \$ 5,153.10 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Herbert & Arlene Madonick | C417 | \$ 17,468.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | HOWARD STEIDLE JR | C067 | \$ 1,332.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Irene M Jones | C1715 | \$ 2,272.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | James & Donna Kolonko | C1903 | \$ 5,822.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Janet Vitale | C1021 | \$ 1,382.85 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Janice M Van Dyck | C1116 | \$ 7,261.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Brandli | C5469 | \$ 5,099.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Shapiro | C1527 | \$ 2,520.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Shapiro | C1528 | \$ 2,521.05 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Shapiro | C1529 | \$ 1,832.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Shapiro | C1530 | \$ 548.05 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jay Shapiro | C1531 | \$ 11,107.07 | 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 |
|---------------|----------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-04C | Jeffrey & Charlotte Pendergraft | C891 | \$ 3,762.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Jess Visser | C7228 | \$ 3,760.60 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Joseph Lammert & Penny Lammert | C10210 | \$ 3,030.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Karen & Joseph H Green | C592 | \$ 2,172.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Karen Chin | C415 | \$ 12,253.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Karen M Stratton | C179 | \$ 2,709.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Karen Sanz & Steve Rubinstein | C1545 | \$ 7,388.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Kathryn Osajda | C5220 | \$ 1,319.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Kathryn S Reimann & Karen Hughes | C397 | \$ 1,848.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Keith T Lehmann | C531 | \$ 26,504.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Kevin C Hale | C411 | \$ 2,007.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Kharla S Gutierrez | C213 | \$ 421.35 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Lawrence Fontana | C802 | \$ 4,980.74 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Lee & Barbara Barbakoff | C428 | \$ 3,176.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Lee R Richardson | C282 | \$ 1,406.10 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Lee R Richardson | C283 | \$ 1,569.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Leslie Groene & Blake Rea | C589 | \$ 1,947.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Linda Wallace | C091 | \$ 1,407.30 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Lois R Hyman | C271 | \$ 6,384.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Luis Gallegos Cambuston | C1136 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Marcia Grandwetter | C1515 | \$ 2,467.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Marcia Grandwetter | C1518 | \$ 11,050.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Marcia Grandwetter | C1519 | \$ 2,488.25 | 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 | REASONS FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|----------------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-04C | Marcia Grandwetter | C1520 | \$ 13,604.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Marcia Grandwetter | C1521 | \$ 2,467.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Mark & Virginia Kettenbach Koors | C862 | \$ 20,537.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | MARTIN & JUSTINE SIGNORELLI | C071 | \$ 3,747.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Mary S Bruce | C1054 | \$ 7,790.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Michael DeMuro | C455 | \$ 20,105.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Michael DeMuro | C456 | \$ 40,698.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Michelle & Kerrri-Ann O'Halloran | C591 | \$ 14,578.38 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | OtisI & Mary Storey | C551 | \$ 2,277.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Patricia & Joseph Altomonte | C569 | \$ 1,569.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Paul Vitale | C1020 | \$ 2,478.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Peter & Trina O Keller | C1255 | \$ 7,844.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Phillip L Buvia | C309 | \$ 2,774.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Regina & Dean Truitt | C1238 | \$ 1,801.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Richard & Gabrielle Tufts | C1934 | \$ 200.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ronald S Bergen | C692 | \$ 20,741.84 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ronni Cline | C481 | \$ 4,283.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Roy Y Williamson & Diane Johnson | C560 | \$ 81,139.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Ruth L Hawkins | C659 | \$ 2,559.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Sami Tucker | C6530 | \$ 16,972.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Samuel C Hathorn | C1220 | \$ 34,490.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Sandra & Ronald Marston | C748 | \$ 1,143.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Sanford Ward | C1992 | \$ 1,334.70 | 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 | REASONS FOR OBJECTION | PROPOSED TREATMENT OF CLAIM | PROPOSED ALLOWED AMOUNT |
|---------------|---------------------------|--------------|------------------------|---|--------------------------------------|-------------------------|
| OOBJ23.04-04C | Seth Park & Kamillah Todd | C2231 | \$ 7,715.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Stephan & Tresa Zumsteg | C1514 | \$ 3,850.60 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Stephen Isaacson | C914 | \$ 1,481.40 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Susan L Taylor | C371 | \$ 1,608.90 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Susane & William Forgione | C897 | \$ 5,647.20 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Teresa & Scott E. Fisher | C1151 | \$ 3,797.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Terry & Connie Palmberg | C832 | \$ 1,844.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Todd | C1783 | \$ 4,507.50 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Todd | C1785 | \$ 6,762.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Todd & Greta Palmberg | C833 | \$ 1,244.70 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | Virginia Jamnicki | C218 | \$ 5,741.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |
| OOBJ23.04-04C | WENDY WEBER | C114 | \$ 7,550.00 | CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) | DISALLOW AND EXPUNGE IN ITS ENTIRETY | \$0.00 |