

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 FIFTEENTH 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 25, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
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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 25, 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
15.OBJ23.04-07C	Alexandra M. Falenski	C5379	\$ 60,851.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTER CARD AND AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Amelia Feinberg	C10669	\$ 7,299.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Bernice Callahan	C4509	\$ 10,935.31	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Bernice Callahan & Ryan Curtis	C4508	\$ 32,477.63	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Betty L Ingram	C190	\$ 4,777.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Carol Irene Fernandez	C2698	\$ 4,199.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Carol Rosenthal - c/o Becker & House	C3183	\$ 7,713.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Charles & Sharon Angell	C6317	\$ 93,113.14	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Charles F Allen	C9971	\$ 7,212.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Christopher Boulter	C2314	\$ 8,434.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Dario & Ana Palma Y Meza	C10582	\$ 3,291.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	David & Ann Esterson	C11485	\$ 6,650.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	David Milluin & Janice Mullin	C10746	\$ 10,709.64	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Dawn Savona	C7697	\$ 4,295.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Deborah Dyke	C10129	\$ 20,219.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Donna Urbanski	C6792	\$ 4,115.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Douglas & Bonnie Crosby	C3794	\$ 17,215.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Edward & Bella Belkin	C10197	\$ 6,554.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Edward & Jane Krauss	C9809	\$ 122,730.22	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Edward Baker	C4096	\$ 1,965.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Elaine Silver	C9044	\$ 728.05	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Eric Rosenbloom	C10899	\$ 1,468.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Georgia Mouzakis	C8550	\$ 1,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Gerald J Czerw	C499	\$ 5,876.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Gerst & Valerie Werner	C1382	\$ 13,390.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Grant Elder	C10436	\$ 2,930.85	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	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
15.OBJ23.04-07C	Gregory & Deborah Owen	C10258	\$ 25,085.74	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Gregory Banks	C501	\$ 22,827.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	HARRY LASTER	C11011	\$ 1,061.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Helene & Warren Rosenfeld	C9984	\$ 13,678.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Howard & Renee Schlesinger	C3401	\$ 54,525.32	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Hugh & Teresa T Osborne	C9805	\$ 3,752.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jack Cutner	C224	\$ 10,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	James + Margaret Haygood	C9974	\$ 2,819.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	James Eakle	C10813	\$ 10,171.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	James Picard & Kathi Renman	C10405	\$ 1,411.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jan Glick	C9758	\$ 2,215.92	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jay Nelson	C10996	\$ 4,878.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jeffrey Baxter Vancavage	C5444	\$ 8,443.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jerry & Debra Tepper	C11457	\$ 3,891.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jimmy & Terry Whorton	C10531	\$ 20,210.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joanne Conklin	C10579	\$ 5,712.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	John & Babette Sherlock	C10864	\$ 1,437.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	John & Helen Trollma	C11435	\$ 5,783.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Jose Miguel Ramos Rodriguez	C10728	\$ 11,776.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10208	\$ 1,938.55	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10205	\$ 1,981.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10206	\$ 3,635.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10207	\$ 4,907.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10209	\$ 4,146.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C10211	\$ 8,288.00	PART OF THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	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
15.OBJ23.04-07C	Joseph & Penny Lammert	C10212	\$ 14,487.65	PART OF THIS CLAIM IS FOR MILESTONE REWARDS WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph & Penny Lammert	C141	\$ 1,525.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Joseph Cook	C10407	\$ 1,124.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Judy & Bryan Rich	C10468	\$ 46,232.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Karen Listgarten	C9772	\$ 1,890.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Karen Meyer	C10591	\$ 1,333.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Karen Quintana	C8157	\$ 8,148.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Katherine Takemoto	C8629	\$ 4,690.05	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Laura Teague	C11507	\$ 3,895.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Laurel Pinnick & Mason Pinnick	C5538	\$ 23,224.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	LAWRENCE & MARLENE EISENBERG	C6680	\$ 15,580.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Lilia Morales Guzman	C10880	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Lindsey A Diforio	C5962	\$ 6,378.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Marc Kurzman	C11335	\$ 1,964.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Marcia Grandwetter	C1516	\$ 5,244.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Marcia Grandwetter	C1523	\$ 532.65	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Margot Woyda	C6529	\$ 2,600.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Mark & Sharon Hackmeyer	C598	\$ 98,857.94	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTER CARD AND AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Mark L Jordan	C325	\$ 300.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Mary Canada & Ronald Woodstock	C1305	\$ 1,349.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Matthew Hukill	C9799	\$ 945.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Michael Atkins	C1171	\$ 22,571.42	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Michael DUNKEL	C11122	\$ 6,639.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Michael Lannon	C8974	\$ 8,946.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Michael Marouni	C3761	\$ 14,674.50	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
15.OBJ23.04-07C	Michael S Vetter	C2987	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Michael Walsh	C9942	\$ 7,825.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Nancy & Charles Pashley	C10636	\$ 3,011.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Niles & Carol Jehn	C11340	\$ 3,827.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Nola Tucker	C11470	\$ 2,342.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Onnie & Robert S Reeves	C840	\$ 3,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Pamela & Tedd Kalkhoff	C10542	\$ 3,146.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Patricia & Thomas R Quinn	C11489	\$ 2,030.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Patricia Rose	C4077	\$ 10,516.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Paul Puryear	C11334	\$ 7,715.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Peter Keller & Trina O Keller	C1254	\$ 18,926.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Randall Friend	C10663	\$ 28,448.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Richard FERRARI	C10827	\$ 500.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Rick Fei & Tina Lingai Jeng	C7950	\$ 9,914.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Robert B Chavez	C500	\$ 24,675.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Ruth L Hawkins	C660	\$ 13,509.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Scott Sweetow	C10434	\$ 8,128.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Stephanie Jeanne Meyers	C3145	\$ 2,762.44	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Steven & Janis Matilla	C6283	\$ 16,830.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Steven Andryk	C9108	\$ 8,628.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Steven Glassman	C1942	\$ 29,754.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Thomas Geuting III	C284	\$ 1,805.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Victor Norton	C2483	\$ 2,867.74	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
15.OBJ23.04-07C	Woodrow Fiveland	C3460	\$ 4,405.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00