

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.

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**ASSIGNEE'S SIXTEENTH 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](mailto: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](mailto: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*  
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](mailto:singerman@bergersingerman.com)  
Samuel J. Capuano  
Florida Bar No. 90946  
[scapuano@bergersingerman.com](mailto: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 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
16.OBJ23.04-08C	Alba Sanchez	C1357	\$ 7,848.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Allyson Moskowitz	C10073	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Arthur Bond	C8970	\$ 6,487.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Barbara Seidman	C5490	\$ 8,527.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Beth & Edward Tobin	C8368	\$ 2,125.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Bradford H Wasner	C1222	\$ 27,268.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Brian Watson	C3832	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Calvin & Elizabeth Moore	C4625	\$ 3,999.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Carmen E Diaz	C3658	\$ 32,487.55	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Carol Ann Richardson	C1886	\$ 1,152.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Carol Irene Fernandez	C3755	\$ 7,454.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Catherine & Stephen Dedman	C8653	\$ 9,504.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Charles & Ginger Reynolds	C4336	\$ 11,591.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Charles M Polanski	C600	\$ 1,872.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Charles W Faires	C3836	\$ 2,129.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Colby & Sheila Collier	C4519	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Corrine G & Donald G Strang	C887	\$ 6,412.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Cynthia Woodward	C8652	\$ 10,142.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Darrell & Melissa Overcash	C4646	\$ 5,528.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	David & Lucille Roberts	C6903	\$ 1,597.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	David & Susan Bader	C2436	\$ 7,398.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	David Eckhart & Cathleen	C2973	\$ 9,104.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	David Musser	C10686	\$ 8,490.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Dennis & Cynthia Ross	C10828	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Donald Berman	C6088	\$ 10,300.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Eilene & Donald Jacobs	C2045	\$ 9,944.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Elizabeth & Stephen Haggart	C2606	\$ 21,768.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Eugene Grah	C6038	\$ 3,977.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

**EXHIBIT 1**

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUND(S) FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
16.OBJ23.04-08C	Frank & Stephanie L Razzano	C1435	\$ 24,180.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	George Desloge	C10743	\$ 6,487.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Glen Garden	C9462	\$ 25,225.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Gordon Griesmann	C3768	\$ 5,641.78	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Henry & Janet B Von Wodtke	C187	\$ 4,299.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Henry Watson II	C8695	\$ 20,120.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Jackie Miller	C8651	\$ 10,142.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	JACQUELINE PIRONE	C6344	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	James & Virginia Plummer	C665	\$ 18,050.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	James Haid	C9916	\$ 1,597.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	James Libby	C6482	\$ 15,328.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Janette Oliver	C4041	\$ 800.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Janice M Van Dyck	C1115	\$ 7,439.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Jenny Catlett	C7164	\$ 3,917.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Joanne Harrison	C1028	\$ 11,658.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	JOEL MARK	C116	\$ 9,800.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	John & Linda Macaskill	C3136	\$ 1,076.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	John & Linda Macaskill	C3140	\$ 2,678.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	John Suhre	C11051	\$ 8,286.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Jonathan Eager	C8553	\$ 3,719.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Karen & John Garth	C1628	\$ 2,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Karl Henry Huck	C10736	\$ 9,594.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Kimberly Chevlin & John Larson	C10537	\$ 10,656.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Kyle & Tommie Philbeck	C10580	\$ 8,490.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Leslie Holst & Debra Holst	C4111	\$ 1,097.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Linda Moesta	C8650	\$ 10,142.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Lindamarie Rosier	C6158	\$ 21,879.72	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	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
16.OBJ23.04-08C	Louis & Sue E Polise	C1917	\$ 2,566.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	LuAnn M & Robert M Hutchinson	C4028	\$ 17,304.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mark & Elaine Stillwell	C4809	\$ 3,539.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mark A Mennella	C1501	\$ 2,249.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mark Capen	C893	\$ 15,534.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mary Ann Brown	C1207	\$ 8,884.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	MARY HERCHE	C10170	\$ 1,616.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mary Pat Bauman	C3489	\$ 856.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mary Pat Bauman	C3490	\$ 1,055.55	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mervin Oneil Jr	C6878	\$ 5,150.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Mervin Oneil Jr	C6882	\$ 2,890.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Michael & Deborah B Grant	C432	\$ 79,292.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Michael Hammer	C4878	\$ 1,978.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Michael Sewell	C2778	\$ 2,864.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Nancy C Paczosa & Joseph L Paczosa	C1601	\$ 4,417.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Norman Miller II	C10283	\$ 15,304.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Pamela Miller & Jeff Cramer	C10133	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Patricia & Fredric Peterson	C10910	\$ 22,598.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY & OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Paul Fish	C10616	\$ 1,079.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Paul Fish	C10617	\$ 1,250.85	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Paul Mayo & Mindy Cohen	C1097	\$ 13,011.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Philip & Margaret Reed	C6377	\$ 4,967.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Philippe Leroy	C3811	\$ 21,535.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY & CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Ralph Newcomb & Antonio Lemes	C2891	\$ 1,917.67	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Ray Burger & Judith Burger	C4186	\$ 20,756.19	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Richard C Neal	C2531	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Robert & Mary Csenar	C6495	\$ 6,390.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	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
16.OBJ23.04-08C	Robert & Sandra Palmer	C9803	\$ 48,672.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Robert Bernstein	C2488	\$ 3,046.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Robert M Shull	C4117	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Ronald & Sandra Laurence	C3964	\$ 4,340.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY & CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Rory V Vance & Maria V Sarmiento	C4408	\$ 1,981.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Roxanne Saylor	C6897	\$ 9,698.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Scott & Diane Rolston	C326	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Scott A Donaldson	C4477	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Sean Pitonak & Deborah Way	C8106	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Thomas & Kimberly Green	C5459	\$ 991.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Thomas & Linda Bobka	C1249	\$ 2,540.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Thomas E. Lahmon	C9480	\$ 10,273.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Thomas E. Lahmon	C9544	\$ 8,248.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	Thomas Teichgraeber	C3758	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	VALENTINE YIEN & DEAN YIEN	C2485	\$ 4,739.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	VALENTINE YIEN & DEAN YIEN	C2486	\$ 4,417.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	William Behr	C3209	\$ 2,222.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
16.OBJ23.04-08C	William Wissler	C3469	\$ 72,778.02	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY & CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00