

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 EIGHTEENTH 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 NOT 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: May 1, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
1450 Brickell Avenue, Suite 1900
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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 May 1, 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
18.OBJ23.05-02C	Akiva Klaiman	C9134	\$ 1,483.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Alan & Judith Robinovitz	C6660	\$ 32,978.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Annie & Andrew Wickstrom	C10408	\$ 6,071.34	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES. PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Barbara Seidman	C5224	\$ 1,749.33	THIS CLAIM WAS SUBMITTED BY TRAVEL AGENT ON BEHALF OF CLAIMANT AND IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Barbara Sheppard	C1401	\$ 1,181.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Barry & Rebecca Rummel	C2445	\$ 32,484.89	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Barry & Rebecca Rummel	C705	\$ 206,358.04	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Bente Rowe	C1399	\$ 1,181.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Bonnie Little & Benjamin Tiffin-Sze	C1400	\$ 2,337.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Brett Dock	C9454	\$ 4,793.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Bruce & Valerie Edwards	C166	\$ 21,260.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Bruce Mcfadyen	C9968	\$ 1,842.50	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Can & Ing Nguyen	C3996	\$ 7,590.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Carl & Eve Buzawa	C7111	\$ 9,008.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Carmen M Puccinelli	C3738	\$ 7,828.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND 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
18.OBJ23.05-02C	Carol & Douglas Swets	C11003	\$ 22,522.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Catherine & George Webster	C4948	\$ 3,497.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Charles Gautschy & Cindy Goldsberry	C8947	\$ 2,193.62	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Charles Rodgers	C10464	\$ 5,746.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Cheryl & John Willms	C11021	\$ 15,580.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Cheryl Granade Sullivan	C3154	\$ 52,957.58	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Choon Seng Tan & Bee Lei Yeo	C8860	\$ 2,636.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Christopher Chow & Wai Xi Anith Lo	C4749	\$ 2,100.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Chung K Mak & Kuen C PAO	C2571	\$ 7,204.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	DARCEY MCVANEL	C7924	\$ 4,702.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Darlene Jovanovic	C1402	\$ 1,181.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	David Ball & Patricia Ball	C11589	\$ 6,995.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	David Bowers	C5999	\$ 3,352.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Demosthenes E Co	C450	\$ 8,660.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Denis ARCAND	C8119	\$ 5,736.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Donna & Eugene Streagle	C2028	\$ 13,664.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Dr. James E. Judge	C041	\$ 2,326.70	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND 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
18.OBJ23.05-02C	Dummi P & Prema Yathiraj	C2609	\$ 8,888.18	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Eli Haugen	C1710	\$ 4,593.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Fidelia Lau & Stephen lau	C2559	\$ 1,896.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Garnet White & Mary Uhl	C2353	\$ 8,038.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Giuseppe Colella	C3556	\$ 1,608.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Gloria Anthony	C3201	\$ 1,726.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Helena Lai & Sthephem KO	C2557	\$ 4,626.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Hung Bun IP & Walter Armstrong	C2555	\$ 3,054.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Ivy & Francis Auyeung	C6739	\$ 1,782.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	J Thomas Geuting III	C358	\$ 13,244.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Jacqueline Chang	C9276	\$ 8,024.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	James Deupree	C4123	\$ 400.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Janey L & Robert Hockenhull	C5374	\$ 71,778.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Jenny & Kim Y Kam Cheung	C2572	\$ 7,500.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Jenny Tsin	C4276	\$ 4,090.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	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
18.OBJ23.05-02C	Jimmy L Rufus	C331	\$ 5,549.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	John & Diane Hohener	C1256	\$ 23,980.56	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	John Dimitrieff	C8582	\$ 6,100.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	John Kelly Jr.	C6162	\$ 6,475.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Joseph & Sharon Young	C3441	\$ 2,048.34	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Karen Marchbanks	C10271	\$ 19,112.89	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND TRAVEL INSURANCE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Kenneth LEVENE	C9737	\$ 1,791.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	King Yoong Wong	C9663	\$ 1,281.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Laraine Mitchell	C1822	\$ 1,194.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Larry Bernrot	C3799	\$ 2,233.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Marcia Grandwetter	C1517	\$ 1,855.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Marcia Grandwetter	C1522	\$ 8,757.67	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Marcia Grandwetter	C1524	\$ 64,768.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Margaret & Benjamin Wong	C3431	\$ 6,138.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Margaret Tait	C7857	\$ 2,647.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Marilyn Dreyfuss	C4700	\$ 2,930.08	THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES. THIS 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
18.OBJ23.05-02C	Mark Malone	C7499	\$ 950.50	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Mathew Soong	C11200	\$ 2,157.70	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Michael & Sally Graydon	C2099	\$ 17,458.96	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Michael Croxton	C3236	\$ 560.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Michael E Lux	C2873	\$ 3,474.30	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Mitchell Albury	C4725	\$ 27,079.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Moniquet & Ian Warrack	C7858	\$ 2,647.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Moti & Suman Kashyap	C817	\$ 1,519.61	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Nicholas Rottunda & Tatiana Ovanessof	C5268	\$ 1,278.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Patrick Shimoda	C5311	\$ 1,340.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Percy Emmerson Gammon	C7295	\$ 1,412.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Philip Cohen	C11342	\$ 11,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Randall Victor Pasternak	C10929	\$ 2,774.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Randy Avard Johnston	C7254	\$ 1,412.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Raymond McCague Crossman	C3146	\$ 2,762.44	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Rebecca Ann Weinstein-Hamilton	C1131	\$ 5,850.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID TO THIRD PARTY FOR TRAVEL INSURANCE PREMIUMS. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND 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
18.OBJ23.05-02C	Richard Spenceley	C9132	\$ 26,313.05	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND TRAVEL INSURANCE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Robert Allen	C7911	\$ 2,478.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Robert Fischer	C4091	\$ 1,798.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Robert Mearse	C11317	\$ 6,576.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Roderick Sandeen	C6173	\$ 2,183.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Ronald & Wendy Cain	C3983	\$ 19,753.40	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Rosemary Reca & Bernard Reca	C4587	\$ 3,711.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Sally & David Sham	C2556	\$ 4,626.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Sandra Wilson	C6163	\$ 6,404.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID TO THIRD PARTY TRAVEL AGENT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Savini Pabilona	C10071	\$ 13,128.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Sharon & Thomas Beck	C8649	\$ 5,545.20	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Shirley Choi & Nelson Choi	C2565	\$ 1,954.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Suet F & Hon K Kam	C1803	\$ 1,725.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Thomas & Barbara Doucette	C8751	\$ 1,954.40	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY TRAVEL AGENT. PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND 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
18.OBJ23.05-02C	Valerie K Liu	C8034	\$ 6,777.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTY FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Vince NG	C7491	\$ 974.75	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Virginia Valerie Cook	C10186	\$ 1,885.21	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	William E Horvath	C2135	\$ 12,382.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	William Hockett & Jack Long Jr	C3325	\$ 101,937.02	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	William Hockett & Jack Long Jr	C3326	\$ 18,318.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS), TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
18.OBJ23.05-02C	Wing T Chan & Pui Lui P Chan	C5170	\$ 2,100.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00