

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 TWENTIETH 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 31, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
1450 Brickell Avenue, Suite 1900
Miami, FL 33131
Telephone: (305) 755-9500
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By: /s/ Samuel J. Capuano
Paul Steven Singerman
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Samuel J. Capuano
Florida Bar No. 90946
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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 31, 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
20.OBJ23.06-01C	Adrienne Abbott	C4193	\$ 4,718.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Alan Maltz	C5437	\$ 33,828.00	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
20.OBJ23.06-01C	Alejandro Corzo	C3235	\$ 6,113.27	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Amy & Michael Ascher	C2727	\$ 16,058.68	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Andrew & Sonja Birrell	C7880	\$ 1,320.60	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
20.OBJ23.06-01C	Andrew R Bornmann	C4215	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Arnold D Armstrong	C207	\$ 2,896.70	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 (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Barbara Bevacqua	C3596	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Barry & Allyn Shulman	C2518	\$ 291,596.00	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Betsy J Moseley & Gordon Bryson	C1532	\$ 6,627.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Brian Callihan	C3521	\$ 9,721.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Brian Krueger	C11108	\$ 15,618.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Carolyn Doyle Brown	C7360	\$ 2,840.00	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
20.OBJ23.06-01C	Cecile F Peters	C1201	\$ 66,556.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Charles & Celia Hansult	C2088	\$ 26,018.70	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
20.OBJ23.06-01C	Charles & Celia Hansult	C2089	\$ 8,647.00	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
20.OBJ23.06-01C	Charles Alfano	C7904	\$ 36,460.14	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Charles Alfano	C7905	\$ 2,257.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) 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
20.OBJ23.06-01C	Charles Alfano	C7906	\$ 2,230.75	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Charles Alfano	C7907	\$ 3,399.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Charles Alfano	C7908	\$ 2,204.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Charles Alfano	C7910	\$ 400.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA & MASTER CARD & AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Christopher J Thompson	C5779	\$ 1,424.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Constance Sada Kuhn	C2862	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Dale Flournoy	C3365	\$ 13,127.70	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
20.OBJ23.06-01C	Daniel & Michele Burke	C2855	\$ 30,976.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Daniel Neidermire & Patrick Frodigh (Robert Neide	C9169	\$ 2,039.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Diana & Michael Miller	C6428	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Donad Gary Hobbs	C2207	\$ 136,001.24	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 (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Donald Ciroale & Edwin Ramirez	C6343	\$ 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
20.OBJ23.06-01C	DORA & HENRY WU	C007	\$ 7,413.10	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
20.OBJ23.06-01C	Elizabeth & Rex Johnson	C308	\$ 45,546.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Ellen & Lawrence Caplan	C5332	\$ 1,754.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Elsa Law	C2995	\$ 1,756.00	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
20.OBJ23.06-01C	Evan D Kegler	C4217	\$ 3,895.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Finis & Charlotte Teeter	C8943	\$ 14,948.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
20.OBJ23.06-01C	Frederick N Masters	C3413	\$ 4,601.03	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Fumihiko & Atsuko Konishi	C8938	\$ 10,413.50	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
20.OBJ23.06-01C	G. Steven Wright & Michael Vilkin	C1815	\$ 32,755.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Gail Grant & Clifford Brackett	C3860	\$ 1,630.50	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
20.OBJ23.06-01C	Gregory Currens	C5416	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Herbert & Lorraine Aldan (Strauss)	C5313	\$ 27,000.00	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
20.OBJ23.06-01C	Irene Li	C6198	\$ 3,599.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Ivan Cintron & Maria Galarza	C4788	\$ 16,047.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Jacqueline M Naclerio	C5795	\$ 6,906.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	James & Carol Emery	C5160	\$ 1,760.00	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).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Janice B & William Gary McCall	C3156	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Janine & Joseph H Gonyea	C758	\$ 12,730.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Jay & Margaret Honeycutt	C3090	\$ 8,955.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Jeanne & Wilson Mcleod	C7879	\$ 1,320.60	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
20.OBJ23.06-01C	Joel Riley	C3865	\$ 7,030.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	John Simon & Barbara Simon	C1823	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	John Wood	C3137	\$ 1,839.15	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Jonathan Korfhage	C5782	\$ 2,316.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Joseph Fenerty & Cynthia Ross	C1418	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Judith Young	C4210	\$ 19,051.50	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
20.OBJ23.06-01C	Kimberly Neidermire & Benjamin Nickerson (Robe	C9171	\$ 2,039.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Leslie Booth	C2672	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Luis Ramos	C5013	\$ 8,286.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Lyubov Franz	C1722	\$ 3,692.53	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Malika Allston	C10085	\$ 6,561.00	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Margaret & William Grant	C6732	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Margaret Connolly (Collica)	C2044	\$ 250.00	THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT 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
20.OBJ23.06-01C	Margaret Conolly	C5227	\$ 500.00	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
20.OBJ23.06-01C	Mark A Brewer	C3778	\$ 7,037.06	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Mark McGrath	C5278	\$ 14,796.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Mary Fredenberg	C4586	\$ 7,812.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Mary Guidera-Barrios	C3376	\$ 579.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Mary Parker	C3164	\$ 4,275.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Mathew Schlansky	C4081	\$ 12,290.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Maurice Koop	C2699	\$ 6,053.73	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Melissa Tuttle Bornmann	C4214	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Michael & Joan Sabin DeLuca	C10644	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Michael Eric Carter	C7807	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	MURIEL WINDOLF	C878	\$ 20,533.20	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Nydia Petrosino	C8455	\$ 18,706.00	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Peggy Cobb	C4407	\$ 4,186.55	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
20.OBJ23.06-01C	PERRY READER & ELAINE SALLOWAY	C118	\$ 1,000.00	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
20.OBJ23.06-01C	Richard & Kit Lecky	C7715	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Richard O Burns	C1039	\$ 4,804.18	THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE AND FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Robert Chu	C3305	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Robert Lee Drossman	C1377	\$ 3,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Robert R. & Renee L. Nunn	C7426	\$ 20,766.06	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
20.OBJ23.06-01C	Roger & Pamela Kumlien (Robert Neidermire)	C9168	\$ 11,616.80	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) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Roger & Peggy Sneegas	C2457	\$ 13,055.00	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).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Ronald & Flora Bluestein	C915	\$ 27,312.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Ross & Catherine North	C8264	\$ 9,799.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Russell Bailey Jr	C4957	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Sara N Bornmann	C4216	\$ 3,895.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Shaun & Kimberly Coffey	C7387	\$ 33,894.48	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Shaw Kim Lee	C8424	\$ 3,749.00	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Simon Benkovich	C8147	\$ 2,453.29	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTER CARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Staci & Richard Flournoy	C6838	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Steven & Kathleen Kiepe	C5624	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Stormy Luttrell	C8440	\$ 5,000.00	THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANTS.	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
20.OBJ23.06-01C	Sue & Fred Grapel	C2058	\$ 13,705.80	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 (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Suzanne Therien	C6879	\$ 15,694.53	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
20.OBJ23.06-01C	Trevor Franz	C1723	\$ 2,455.44	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	Viet Hai Hoang	C254	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
20.OBJ23.06-01C	William & Patricia Moore	C8991	\$ 1,270.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00