

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 TWENTY-FIRST 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: June 7, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
1450 Brickell Avenue, Suite 1900
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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 June 7, 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
21.OBJ23.06-02C	Alfredo San Miguel & Concepcion Jose Sanga	C7827	\$ 1,257.00	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
21.OBJ23.06-02C	Andres Banos Samblancat	C4743	\$ 19,808.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Anne M Rubin	C4580	\$ 825.25	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Bruce Lawson	C9102	\$ 58,658.45	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
21.OBJ23.06-02C	Carol Ann Hume King	C8671	\$ 1,977.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Carol Takami	C7909	\$ 4,124.00	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
21.OBJ23.06-02C	Catherine & Steven Schultz	C6113	\$ 227,252.66	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
21.OBJ23.06-02C	Cheng yee Ding & Chiu Anita Shuk Ching	C4046	\$ 1,000.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Cheung Chung Mun Annaliza	C7705	\$ 2,888.25	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED ON BEHALF OF CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Christie & Walter Graham	C8660	\$ 12,318.00	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
21.OBJ23.06-02C	Christine & Thomas Noble	C7731	\$ 6,052.50	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
21.OBJ23.06-02C	Chun Kuen Chan & Kwow Ling	C11535	\$ 7,571.20	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Cynthia D Kunihiro	C3532	\$ 576.04	CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Daniel & Amanda Yeager	C6597	\$ 4,707.50	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD) TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	David & Catharina Whitehead	C8557	\$ 2,640.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Dennis Harker	C9943	\$ 2,445.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Dennis Lisula	C9249	\$ 5,043.91	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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT OF CLAIM	PROPOSED ALLOWED AMOUNT
21.OBJ23.06-02C	Dr Daniel Abbott	C1479	\$ 1,905.60	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
21.OBJ23.06-02C	Dr. Michael Bernstein & Dr. Julie Rose (Gloria Lev	C5356	\$ 13,070.00	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Dr. Michael Bernstein & Dr. Julie Rose (Gloria Lev	C5359	\$ 16,942.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	George R Sain	C5808	\$ 9,400.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	George Sundby	C10528	\$ 46,724.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Gloria Mae Levin	C5353	\$ 8,798.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Gloria Mae Levin	C5361	\$ 229.47	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Gloria Mae Levin & Wendie Sue Lash	C5363	\$ 2,182.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Hang Ming Lai & Daniel Yip	C9598	\$ 1,600.00	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Harley Warren Richardson	C7285	\$ 1,270.00	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
21.OBJ23.06-02C	Inge & Jeff Klopping	C6050	\$ 5,809.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Jacquelyn HARRIS	C9146	\$ 733.25	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	James & Virginia Plummer	C666	\$ 10,430.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Janice A & Alexander M Gerolimatoss	C7249	\$ 22,364.00	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
21.OBJ23.06-02C	Janice Dunstan	C6575	\$ 1,500.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Jason Ping Kau & Dolly Yen Yip	C7682	\$ 1,889.70	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2020.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Jeffrey & Mari Marks	C9528	\$ 6,529.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Joette Labinger	C4827	\$ 1,842.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	John & Patricia Canzano	C3230	\$ 17,358.90	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Judy Wilkinson & Steven Mendelsohn	C8503	\$ 200.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Karen Forney	C5927	\$ 5,249.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Karen Kondazian	C7706	\$ 66,736.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	KARRY NGAI	C8167	\$ 4,725.75	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
21.OBJ23.06-02C	Kathleen Dawson	C7113	\$ 3,220.92	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Kenneth & Karen Shaw	C5906	\$ 3,000.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Keren Putman	C6133	\$ 4,201.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Kimberly Maryanne Allard	C7498	\$ 2,870.25	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
21.OBJ23.06-02C	Kwong Mei Chun Winnie	C7704	\$ 2,581.25	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED ON BEHALF OF CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Lawrence M. Small	C3482	\$ 16,657.20	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Lawrence M. Small	C3485	\$ 500.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Lewis M Coco & Nancy M Coco	C4162	\$ 12,993.48	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Louis Diamond	C10317	\$ 2,170.40	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Marjorie B Murstein	C519	\$ 3,065.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Marjorie B Murstein	C520	\$ 2,598.60	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Marjorie Kakara	C7860	\$ 5,221.00	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2020 AND 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Mark & Abby Lerner	C10835	\$ 6,850.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Mark & Andrea Fujii	C8047	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Masami Hagihara	C4151	\$ 6,509.60	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Melinda McMullen	C10578	\$ 79,885.50	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS) TRAVEL INSURANCE AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Michael & Janice Rubino	C5776	\$ 11,460.50	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Michael & Mary Jane Rice	C7465	\$ 12,499.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Michael Hootman	C10858	\$ 4,172.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Michael Kelly	C11514	\$ 13,968.00	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
21.OBJ23.06-02C	Mr & Mrs Timothy Dove	C4385	\$ 4,000.00	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
21.OBJ23.06-02C	Mr. & Mrs. Richard A Graham	C8661	\$ 12,318.00	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
21.OBJ23.06-02C	Nancy & Joseph L Paczosa	C1600	\$ 4,739.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Patricia Kilgore & Alberta Carruth	C7552	\$ 5,399.67	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Patricia Marusarz & Philip Marusarz	C6360	\$ 4,535.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Paula McCaffrey	C10337	\$ 1,619.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Peter & Deborah Koeppel	C7479	\$ 14,686.90	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
21.OBJ23.06-02C	Philip Davis	C9536	\$ 2,495.50	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Rebeca Ward	C2636	\$ 8,385.36	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Rebecca "Becky" Bowles	C8458	\$ 1,529.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	RICHARD & MICHELE GRAHAM	C9759	\$ 4,698.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert & Deborah O'Neill	C8080	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert & Linda Rein	C8171	\$ 14,065.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert Lewis	C11454	\$ 658.60	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
21.OBJ23.06-02C	Robert Lewis	C11455	\$ 6,866.10	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert Rosenberg	C169	\$ 8,049.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert Rosenberg	C173	\$ 2,520.04	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Robert Stoneham & Janice Reischel	C1860	\$ 2,000.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Russell & Kerry Barber	C11465	\$ 1,143.42	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Sandra Budnick	C4107	\$ 100.00	CLAIM IS FOR A COMPLETED VOYAGE. CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Sandra H. Small	C3483	\$ 16,657.20	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	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
21.OBJ23.06-02C	Sandra H. Small	C3484	\$ 500.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Saverio Arella	C2041	\$ 100.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Sibul	C1788	\$ 16,895.76	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
21.OBJ23.06-02C	Sibul	C1941	\$ 147,691.03	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
21.OBJ23.06-02C	Susan Krotec & Joseph Krotec	C11632	\$ 400.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Susan Sepehri	C7859	\$ 15,778.74	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Susan Weisse	C4115	\$ 365.00	CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Susanna Schweizer	C5941	\$ 4,201.80	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Suzanne Reinhart	C3533	\$ 576.04	CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Teik Huat Quah & Bee Lean Tan	C5861	\$ 1,600.00	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2019.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Thomas Rousseau	C8165	\$ 1,409.34	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
21.OBJ23.06-02C	Thomas Yee	C9335	\$ 4,500.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	To Lien Le	C4088	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Walter Schurga Jr	C8749	\$ 5,111.64	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
21.OBJ23.06-02C	William & Suzan-Oda Knese	C2756	\$ 45,523.82	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
21.OBJ23.06-02C	William H Stern	C1427	\$ 100.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY TRAVEL INSURANCE COMPANY.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	William O'Connor	C8412	\$ 3,359.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD) AND OTHER SOURCES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Winnie Mei Chun Kwong	C7601	\$ 1,430.00	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED ON BEHALF OF CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00
21.OBJ23.06-02C	Yun Cheung & Hayati Nurul & Daniel Maulana	C4761	\$ 2,250.00	CLAIM WAS SUBMITTED BY TRAVEL AGENT ON BEHALF OF CLAIMANT AND IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY AGENT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY	\$0.00