

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

In re:

COMPLEX BUSINESS LITIGATION
DIVISION

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 THIRD OMNIBUS
OBJECTION TO DISPUTED WAGE 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 CLAIM LISTED IN EXHIBIT "A" 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, of Michael Moecker & Associates, Inc. (the "Assignee"), as Assignee for the Benefit of Creditors of Crystal Cruises, LLC (the "Assignor"), by and through his undersigned

counsel, files this Third Omnibus Objection to Disputed Wage Claims (the “Objection”) pursuant to §§ 727.109, 727.111, and 727.113, *Florida Statutes*, as to the claims listed in the Objection below, and in support thereof states as follows:

BACKGROUND

1. On February 10, 2022, the Assignor executed an assignment of its assets in favor of the Assignee pursuant to Chapter 727, *Florida Statutes*.

2. On February 11, 2022 (the “Petition Date”), the Assignee filed a Petition for Assignment for the Benefit of Creditors on behalf of the Assignor pursuant to Chapter 727, *Florida Statutes*, thereby commencing the following assignment for the benefit of creditors cases 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”).

3. 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

4. Pursuant to § 727.113(3), *Florida Statutes*, “[t]he assignee, as well as any creditor or any party in interest, has standing to challenge the validity, extent, or priority of any claim filed by a creditor.”

5. Section 727.113(1), *Florida Statutes*, further provides “[a]t any time before the entry of an order approving the assignee’s final report, the assignee or any party in interest may file with the court an objection to a claim.”

6. The Assignee has received and shall approve dozens of claims made for the payment of wages made by former employees of the Assignor.

7. Notwithstanding, the Assignee hereby objects to the claims (the “Objectionable Wage Claims”) listed in **Exhibit “A”** to this Objection, to the extent set forth therein.

PROCEDURES FOR CONSUMER AND EMPLOYEE CLAIMS OBJECTIONS

8. 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”).

9. 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.

10. 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.

11. 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.

12. 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 designed representative.

13. 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.

14. 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.

15. 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.

16. The Assignee may, in his 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.

17. Pursuant to the Claims Procedure Order, if allowed, the first \$10,000.00 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).

18. Pursuant to the Claims Procedure Order, if allowed, the first \$2,225.00 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).

19. The Assignee reserves the right to object to other claims or raise additional objections with respect to the Objectionable Wage Claims.

WHEREFORE, the Assignee respectfully requests this Court enter an Order in substantially the form attached hereto as **Exhibit "B"**: (i) sustaining the Assignee's Objections to the Objectionable Wage Claims; (ii) approving the Assignee's proposed disposition of the

Objectionable Wage Claims; and (iii) granting such other and further relief as this Court deems appropriate under the circumstances.

DATED this 21st day of June 2023.

NARDELLA & NARDELLA, PLLC
Co-General Counsel for Assignee
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(407) 966-2680

By: /s/ Paul N. Mascia

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the *Assignee's Third Omnibus Objection to Dispute Wage Claims* was served on June 21, 2023 (1) via the Florida Court's e-Filing Portal, which served the Objection upon all parties and interested persons of record in this action; and (2) via e-service to the claimants listed on the attached **Exhibit "A"** and pursuant to the Claims Procedure Order as follows: Mark Haslam at bunbury2@icloud.com, Laura Mason L.mason8@icloud.com, Abigail Louise Groome at dabbyg@hotmail.co.uk, Mario Tognazzini joelspire@mac.com, Mark Merchant at twovoices@me.com, Bernard Walz at pianopassion@bernardwalz.com, Hector J. Olivera at lieveoli@aol.com, Margean Sergiu at sir.margean@yahoo.com, Marcel Peliciu at marcelpeliciu@gmail.com, Hirtanu Dragos at dragos.hirtanu@yahoo.ro, Vasileios Grivas at bgrivas@gmail.com, Stephen Bone at debohun@gmail.com, Marian Cimpean at cimpean29@yahoo.com, Lorena Parada at

lorena.051@gmail.com, Mircea Atanasiu at mircea.a86@gmail.com , Ivan Popovic at ivanpop79@me.com, Liviu Cobzaru at liviucobzaru@gmail.com, Manazie Nedeloui Sebastian Catalin at manaziec@yahoo.com, Szabolcs Boldizsar at tussogo007@gmail.com, Constantin-Gabriel Gosman at gosmaan.gabriel@gmail.com , Lilla Bratkovics at Lbratkovics@gmail.com, Kathleen Sarah Hayes at sarahhayesmusic@gmail.com, James Mullett at jamesfoxuk@me.com, Prodan Ionel Melete at cornel_pro@yahoo.com, Laszlo Biro at biro_laszlo@hotmail.com, Ilija Marojevic at ilijamarojevic84@gmail.com, Adrian Sabin David at sabindavid66@yahoo.com, Cristian Ciurea at crisian_ciurea@yahoo.com, and Johannes Bar at j.baer@icloud.com.

/s/ Paul N. Mascia

Paul N. Mascia, Esq.

Exhibit A

Objectionable Wage Claims

<u>Claim No.</u>	<u>Claimant</u>	<u>Claim Amount</u>	<u>Basis for Objection and Extent of Objection</u>
2147	Haslam, Mark	\$8,500.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2236	Mason, Laura	\$1,661.54	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2237	Groome, Abigail Louise	\$1,661.54	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2551	Tognazzini, Mario	\$3,000.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2653	Merchant, Mark	\$6,000.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2655	Walz, Bernard	\$12,214.28	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon

			information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2769	Olivera, Hector J.	\$3,857.15	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2774	Sergiu, Margean	\$8,139.04	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2795	Peliciu, Marcel	\$11,400.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, the claimant has failed to provide support for the basis of the claim and upon information and belief, the claimant was not an employee of the Assignor. The Assignee therefore objects to this claim in its entirety.
2809	Dragos, Hirtanu	\$5437.98	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, the claimant has failed to provide support for the basis of the claim and upon information and belief, the claimant was not an employee of the Assignor. The Assignee therefore objects to this claim in its entirety.
2811	Grivas, Vasileios	\$13,435.26	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2816	Bone, Stephen	\$120,000.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.

2821	Cimpean, Marian	\$11,601.48	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2825	Parada, Lorena	\$3,763.89	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2828	Atanasiu, Mircea	\$8,764.67	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2829	Popovic, Ivan	\$13,240.06	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2830	Cobzaru, Liviu	\$12,316.34	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2833	Catalin, Manazie Nedeloiu Sebastian	\$11,876.06	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2834	Boldizar, Szabolcs	\$13,364.37	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an

			employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2841	Gabriel, Gosman Constantin	\$6,454.67	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2858	Bratkovics, Lilla	\$9,935.18	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2859	Hayes, Kathleen Sarah	\$2,941.96	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2862	Mullett, James	\$13,500.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of International Cruise Services, LTD. The Assignee therefore objects to this claim in its entirety.
2863	Melete, Prodan Ionel	\$14,825.22	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2867	Biro, Laszlo	\$21,029.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.

2875	Marojevic, Ilija	\$10,963.00	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2891	David, Adrian Sabin	\$3,291.65	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2892	Ciurea, Cristian	\$7,865.3	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.
2972	Bar, Johannes	\$5,131.80	This claim was filed as a priority wage claim under § 727.114(1)(d), Fla. Stat. (2022). However, upon information and belief, the claimant was not an employee of the Assignor but was instead an employee of Crystal River Cruises Manning, LTD. The Assignee therefore objects to this claim in its entirety.

Exhibit B

Proposed Order

IN THE CIRCUIT COURT IN AND FOR
THE FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR
PALM BEACH COUNTY, FLORIDA

Assignment for the Benefit of Creditors 2018-CA-10254
PSM HOLDINGS, INC.

Assignment for the Benefit of Creditors 2018-CA-10256
PRIME SOURCE MORTGAGE, INC.

Assignment for the Benefit of Creditors 2018-CA-10266
WWYH, INC.

Assignors,

Jointly Administered Under
Case No. 2018-CA-10254

vs.

MARK C. HEALY,

Assignee.

_____ /

ORDER GRANTING ASSIGNEE’S THIRD OMNIBUS OBJECTION TO CLAIMS

THIS CAUSE came before the Court upon the *Assignee’s Third Omnibus Objection to Disputed Wage Claims* filing on ____ ____, 2023 (the "Objection") by Mark C. Healy (the “Assignee”), solely in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC (the “Assignor”), as an Objection to the Proofs of Wage Claims (the “Claims”) submitted to the Assignee by Mark Haslam, Laura Mason, Abigail Louise Groome, Mario Tognazzini, Mark Merchant, Bernard Walz, Hector J. Olivera, Margean Sergiu, Marcel Peliciu, Hirtanu Dragos, Vasileios Grivas, Stephen Bone, Marian Cimpean, Lorena Parada, Mircea Atanasiu, Ivan Popovic, Liviu Cobzaru, Manazie Nedeloui Sebastian Catalin, Szabolcs Boldizsar, Constantin-Gabriel Gosman, Lilla Bratkovics, Kathleen Sarah Hayes, James, Mullett, Prodan

Ionel Melete, Laszlo Biro, Ilija Marojevic, Adrian Sabin David, Cristian Ciurea, and Johannes Bar (the “Claimants”). The Court, having reviewed the Objection and record in this case, finding that notice of the Objection was sufficient and properly served on the Claimants and to interested parties pursuant to §§ 727.103, 727.111(4) and 727.113, Fla. Stat. (2022), noting that no response to the Objection from the Claimants was received by the Assignee or filed within the 21-day negative notice period set forth in the Objection, finding that the relief requested in the Objection is in the best interest of the Assignor’s estate, and otherwise finding that good and sufficient cause exists for granting the relief set forth herein, does hereby

ORDER AND ADJUDGE that:

1. The assignee’s Objection is SUSTAINED as to the Claims of the Claimants whose claims are attached as Exhibit “A” to the Objection and otherwise set forth in the Objection.
2. Each of the Claimant’s Claims attached as Exhibit “A” to the Objection and otherwise set forth in the Objection shall be allowed in the amount, if any, set forth below next to the Claimant’s name, with the statutory priority as to payment pursuant to Chapter 727, Fla. Stat. (2022), indicated for the same:

<u>Claim No.</u>	<u>Claimant</u>	<u>Treatment of Claim</u>
2147	Haslam, Mark	The claim is denied in its entirety.
2236	Mason, Laura	The claim is denied in its entirety.
2237	Groome, Abigail Louise	The claim is denied in its entirety.
2551	Tognazzini, Mario	The claim is denied in its entirety.
2653	Merchant, Mark	The claim is denied in its entirety.

2655	Walz, Bernard	The claim is denied in its entirety.
2769	Olivera, Hector J.	The claim is denied in its entirety.
2774	Sergiu, Margean	The claim is denied in its entirety.
2795	Peliciu, Marcel	The claim is denied in its entirety.
2809	Dragos, Hirtanu	The claim is denied in its entirety.
2811	Grivas, Vasileios	The claim is denied in its entirety.
2816	Bone, Stephen	The claim is denied in its entirety.
2821	Cimpean, Marian	The claim is denied in its entirety.
2825	Parada, Lorena	The claim is denied in its entirety.
2828	Atanasiu, Mircea	The claim is denied in its entirety.
2829	Popovic, Ivan	The claim is denied in its entirety.
2830	Cobzaru, Liviu	The claim is denied in its entirety.
2833	Catalin, Manazie Nedeloiu Sebastian	The claim is denied in its entirety.
2834	Boldizsar, Szabolcs	The claim is denied in its entirety.
2841	Gabriel, Gosman Constantin	The claim is denied in its entirety.
2858	Bratkovics, Lilla	The claim is denied in its entirety.
2859	Hayes, Kathleen Sarah	The claim is denied in its entirety.
2862	Mullett, James	The claim is denied in its entirety.
2863	Melete, Prodan Ionel	The claim is denied in its entirety.
2867	Biro, Laszlo	The claim is denied in its entirety.
2875	Marojevic, Ilija	The claim is denied in its entirety.

2891	David, Adrian Sabin	The claim is denied in its entirety.
2892	Ciurea, Cristian	The claim is denied in its entirety.
2972	Bar, Johannes	The claim is denied in its entirety.

3. The Assignee is authorized to take all actions necessary or appropriate to give effect to this Order.
4. The Terms, conditions, and provisions of this Order shall be immediately effective and enforceable upon entry hereof.
5. The Court shall retain jurisdiction to resolve any dispute arising from or relating to this Order.

DONE and ORDERED in Chambers at Miami-Dade County, Florida on this ____ day of _____, 2023.

Hon. Lisa Walsh

CIRCUIT COURT JUDGE

Electronically Served:

Physically Served: