

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 THIRTIETH 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. **In this Objection, the Assignee is objecting to the priority nature of the proofs of claim set forth on the attached Exhibit 1. The Assignee expressly reserves, and does not waive, his right to object to the amount of such claims, if appropriate.**

8. 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.

9. 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.

10. 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.

11. 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

12. 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.

13. 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.

14. 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.

15. 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

16. 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).

17. 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).

18. 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: July 11, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
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By: /s/ Samuel J. Capuano
Paul Steven Singerman
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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 July 11, 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	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	Alejo Vidal-Quadras	C8975	\$ 7,964.55	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$484.61	\$0.00
30.OBJ23.07-04C	Ali Ibraheem & Heather Lindfield	C8986	\$ 23,078.54	CLAIM IS ONE OF THREE CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$18,628.54
30.OBJ23.07-04C	Ali Ibraheem & Heather Lindfield	C8987	\$ 25,046.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$25,046.00
30.OBJ23.07-04C	Ali Ibraheem & Heather Lindfield	C8988	\$ 8,564.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$8,564.00
30.OBJ23.07-04C	Alynn Plaisted	C4903	\$ 1,285.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Andrea Gunnarson	C7332	\$ 9,309.18	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$7,084.18
30.OBJ23.07-04C	Andrea Gunnarson	C7331	\$ 4,748.25	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$4,748.25
30.OBJ23.07-04C	Anne Clark	C7153	\$ 715.40	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Anne Clark	C7154	\$ 4,701.75	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Anne Clark	C7155	\$ 4,210.50	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Antonia Slonim	C846	\$ 3,205.45	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$980.45
30.OBJ23.07-04C	Antonia Slonim	C847	\$ 2,131.73	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$2,131.73
30.OBJ23.07-04C	Barbara & William D Long	C792	\$ 6,340.50	CLAIM IS ONE OF THREE CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$1,890.50
30.OBJ23.07-04C	Barbara & William D Long	C793	\$ 1,492.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,492.00
30.OBJ23.07-04C	Barbara & William D Long	C794	\$ 606.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$606.00
30.OBJ23.07-04C	Bjorn Dybdahl	C5092	\$ 34,196.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM. CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD). CLAIMANT IS NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$26,558.00
30.OBJ23.07-04C	Bjorn Dybdahl	C5093	\$ 21,294.60	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD). CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$0.00	\$14,414.60

In this Objection, the Assignee is objecting to the priority nature of the proofs of claim set forth on this Exhibit 1. The Assignee expressly reserves, and does not waive, his right to object to the amount of such claims, if appropriate.

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	Brian & Irene Au	C9154	\$ 1,181.00	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C9154 & C9155 AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,472.50	\$0.00
30.OBJ23.07-04C	Brian & Irene Au	C9155	\$ 1,291.50	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C9154, C9155.	\$0.00	\$0.00
30.OBJ23.07-04C	Cheng-Ji Sheu & Yu-Ling HSU	C7980	\$ 6,639.60	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$119.07	\$0.00
30.OBJ23.07-04C	Christophe Mazel	C9610	\$ 1,583.70	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	David Morgan	C9700	\$ 16,864.30	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$199.92	\$0.00
30.OBJ23.07-04C	David Parks	C6754	\$ 31,342.20	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$198.50	\$0.00
30.OBJ23.07-04C	David Wright	C4562	\$ 7,527.90	CLAIMANT HAS BEEN COMPENSATED IN PART BY TRAVEL INSURANCE COMPANY. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$1,407.90
30.OBJ23.07-04C	Deborah Nichols	C10860	\$ 6,346.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$2,786.50	\$0.00
30.OBJ23.07-04C	Derek Turner	C4879	\$ 1,470.17	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Edward Yurkowski	C4720	\$ 5,607.50	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$1,157.50
30.OBJ23.07-04C	Edward Yurkowski	C4719	\$ 1,847.48	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,847.48
30.OBJ23.07-04C	Elise Rosenberg	C8575	\$ 12,434.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$200.00	\$0.00
30.OBJ23.07-04C	Gary Bottomer	C11234	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$1,897.50	\$0.00
30.OBJ23.07-04C	Gary Budd & Sharon Budd	C4490	\$ 3,673.20	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4490 & C4491 AND ALLOW PARTIAL PRIORITY PAYMENT.	\$4,450.00	\$2,287.20
30.OBJ23.07-04C	Gary Budd & Sharon Budd	C4491	\$ 3,063.60	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4490 & C4491.	\$0.00	\$0.00
30.OBJ23.07-04C	Genevieve Daniels	C7334	\$ 4,671.35	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD). CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$229.41
30.OBJ23.07-04C	Genevieve Daniels	C7333	\$ 9,337.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$9,337.00

In this Objection, the Assignee is objecting to the priority nature of the proofs of claim set forth on this Exhibit 1. The Assignee expressly reserves, and does not waive, his right to object to the amount of such claims, if appropriate.

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	George Ramsay	C7853	\$ 14,660.25	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$3,333.75	\$0.00
30.OBJ23.07-04C	Harvey & Olivera Finn	C7460	\$ 9,752.00	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$5,302.00
30.OBJ23.07-04C	Harvey & Olivera Finn	C7461	\$ 5,444.80	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$5,444.80
30.OBJ23.07-04C	Herman Bern Pitti	C9122	\$ 1,664.70	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C9122 & C9131 AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,729.40	\$0.00
30.OBJ23.07-04C	Herman Bern Pitti	C9131	\$ 1,064.70	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C9122, C9133.	\$0.00	\$0.00
30.OBJ23.07-04C	Hsiu Ling Tseng & Hsintah Lin	C6702	\$ 7,904.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$2,019.50	\$0.00
30.OBJ23.07-04C	James Myers	C10652	\$ 7,307.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$832.93	\$0.00
30.OBJ23.07-04C	James T & Lucille M Kissock	C1025	\$ 3,913.00	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C1025 & C3398, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$2,063.38
30.OBJ23.07-04C	James T & Lucille M Kissock	C3398	\$ 2,600.38	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C1025 & C3398.	\$0.00	\$0.00
30.OBJ23.07-04C	Janet L Hermer	C7720	\$ 3,982.00	CLAIM IS ONE OF FOUR CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$1,757.00
30.OBJ23.07-04C	Janet L Hermer	C7718	\$ 3,415.50	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2022. CLAIM IS ONE OF FOUR CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$0.00	\$600.00
30.OBJ23.07-04C	Janet L Hermer	C7721	\$ 4,728.94	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$4,728.94
30.OBJ23.07-04C	Jhon Ronald Eisener	C7265	\$ 1,270.00	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	\$0.00
30.OBJ23.07-04C	John & Anne Louis	C8177	\$ 19,958.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$1,864.00	\$0.00
30.OBJ23.07-04C	John Ronald Elsener	C4739	\$ 1,270.00	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2022.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Karen Bibbo	C3131	\$ 9,788.00	PART OF THIS CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY ANOTHER CLAIMANT WHO IS OTHER GEST ON THIS RESERVATION.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$2,669.00

In this Objection, the Assignee is objecting to the priority nature of the proofs of claim set forth on this Exhibit 1. The Assignee expressly reserves, and does not waive, his right to object to the amount of such claims, if appropriate.

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	Karen Hansen	C3609	\$ 7,527.90	CLAIMANT HAS BEEN COMPENSATED IN PART BY TRAVEL INSURANCE COMPANY. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$1,407.90
30.OBJ23.07-04C	Keith Steiner	C3040	\$ 35,502.20	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C3040 & C3041, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$63,381.40
30.OBJ23.07-04C	Keith Steiner	C3041	\$ 32,329.20	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C3040 & C3041.	\$0.00	\$0.00
30.OBJ23.07-04C	Kuniko Frandsen	C4819	\$ 2,263.95	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$38.95
30.OBJ23.07-04C	Kuniko Frandsen	C4820	\$ 1,110.43	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,110.43
30.OBJ23.07-04C	Lashun & Beverly Clayton	C8656	\$ 6,380.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$979.20	\$0.00
30.OBJ23.07-04C	Li Chen	C9004	\$ 26,434.50	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$21,984.50
30.OBJ23.07-04C	Li Chen	C9005	\$ 66,898.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$66,898.00
30.OBJ23.07-04C	Louis Wong	C7603	\$ 28,554.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD). CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANTS. EACH CONSUMER IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$2,333.00
30.OBJ23.07-04C	Louis Wong	C5901	\$ 2,553.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$2,553.00
30.OBJ23.07-04C	Lynn B Jordan	C7306	\$ 1,010.55	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C7306, C7307 AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,871.70	\$0.00
30.OBJ23.07-04C	Lynn B Jordan	C7307	\$ 861.15	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C7306, C7307.	\$0.00	\$0.00
30.OBJ23.07-04C	Marc Vermeire	C7545	\$ 4,508.55	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$2,283.55
30.OBJ23.07-04C	Marc Vermeire	C7543	\$ 1,157.70	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,157.70

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EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	Marc Vermeire	C7544	\$ 2,149.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$2,149.00
30.OBJ23.07-04C	Marc Vermeire	C7546	\$ 660.45	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$660.45
30.OBJ23.07-04C	Marc Vermeire	C7547	\$ 3,299.40	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$3,299.40
30.OBJ23.07-04C	Marc Vermeire	C7548	\$ 1,277.25	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,277.25
30.OBJ23.07-04C	Marc Vermeire	C7549	\$ 3,648.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$3,648.00
30.OBJ23.07-04C	Pamela R. Obrien	C9551	\$ 7,790.00	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$500.00	\$0.00
30.OBJ23.07-04C	Patricia Seiler	C11009	\$ 6,918.58	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$100.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4531	\$ 21,508.00	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537. ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$71,597.26
30.OBJ23.07-04C	Paul Kasten	C4532	\$ 7,790.00	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4533	\$ 3,814.76	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4534	\$ 6,514.50	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4535	\$ 5,664.50	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4536	\$ 11,998.00	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Kasten	C4537	\$ 18,757.50	CLAIM IS ONE OF SEVEN CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C4531, C4532, C4533, C4534, C4535, C4536 & C4537.	\$0.00	\$0.00
30.OBJ23.07-04C	Paul Myers & Shirley Pearce	C10651	\$ 13,970.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$1,592.46	\$0.00
30.OBJ23.07-04C	Raymond & Jill Scalabrino	C8724	\$ 9,824.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$3,316.80	\$0.00

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REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
30.OBJ23.07-04C	Richard & Kellie Bertain	C7621	\$ 11,002.50	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$3,504.50	\$0.00
30.OBJ23.07-04C	Rodolfo & Maria Stiglich	C4523	\$ 35,748.50	CLAIM IS ONE OF SEVERAL CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT & RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$31,298.50
30.OBJ23.07-04C	Rodolfo & Maria Stiglich	C4521	\$ 500.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$500.00
30.OBJ23.07-04C	Rodolfo & Maria Stiglich	C4522	\$ 2,371.20	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$2,371.20
30.OBJ23.07-04C	Rodolfo & Maria Stiglich	C4524	\$ 24,217.50	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANTS.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Rodolfo & Maria Stiglich	C4525	\$ 3,954.00	CLAIMANTS WERE REFUNDED BY CRYSTAL IN 2019.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5518	\$ 17,422.00	CLAIM IS ONE OF NINE CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$12,972.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5511	\$ 400.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$400.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5512	\$ 1,000.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,000.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5513	\$ 9,360.94	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$9,360.94
30.OBJ23.07-04C	Ronald & Leslie Munson	C5514	\$ 2,665.20	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$2,665.20
30.OBJ23.07-04C	Ronald & Leslie Munson	C5515	\$ 200.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$200.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5516	\$ 200.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$200.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5517	\$ 9,227.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$9,227.00
30.OBJ23.07-04C	Ronald & Leslie Munson	C5519	\$ 200.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$200.00
30.OBJ23.07-04C	Rosanne & Stephen Ezer	C7673	\$ 14,296.00	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT & ALLOW PARTIAL PRIORITY PAYMENT.	\$2,195.70	\$0.00
30.OBJ23.07-04C	Sandra Plaisted	C4902	\$ 1,285.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
30.OBJ23.07-04C	Virgilio Garza Trevino Jr	C8983	\$ 8,344.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020. CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$3,194.00
30.OBJ23.07-04C	Virgilio Garza Trevino Jr	C8984	\$ 8,344.00	CLAIM IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANT.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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30.OBJ23.07-04C	Yngve Sorensen	C11601	\$ 51,681.31	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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