

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.

**MOTION FOR APPROVAL AND PAYMENT OF
FEES AND REIMBURSEMENT OF EXPENSES INCURRED
BY LOSEY PLLC AS SPECIAL COUNSEL TO THE ASSIGNEE
FOR THE PERIOD OF JANUARY 1, 2023 THROUGH JUNE 30, 2023**

**NOTICE OF OPPORTUNITY TO OBJECT
TO CREDITORS AND OTHER INTERESTED PARTIES:**

PLEASE TAKE NOTICE that, pursuant to Fla Stat. § 727.111(4), the Assignee may pay the fees and expenses of professional persons employed by the Assignee as set forth herein, and the Court may consider these actions without further notice or hearing unless a party in interest files an objection within 21 days from the date this paper is served. If you object to the relief requested in this paper, you must file your objection with the Miami-Dade County Clerk of the Court at 73 W. Flagler Street, Room 133, Miami, FL 33130, and serve a copy on the Assignee's counsel, Paul Steven Singerman, Esq. and Samuel Jason Capuano, Esq., Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131, and any other appropriate person. If you do not file an objection within the time permitted, the Assignee and the Court will presume that you do not oppose the granting of the relief requested in the paper.

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”), pursuant to Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), and the Court’s *Order Granting Assignee’s Motion for Entry of an Order: (1) Approving Noticing Procedures, (2) Approving Proof of Claim Forms; and (3) Extending Deadline to Serve Notice of Assignment* (the “Notice Procedures Order”) entered on March 3, 2022, files this motion (the “Motion”) for approval and payment of fees in the amount of \$24,887.00 and reimbursement of expenses in the amount of \$1,125.39 for a total award of \$26,012.39 incurred by Losey PLLC (“LPLLC”) in connection with its representation of the Assignee during the period of January 1, 2023 through June 30, 2023 (the “Application Period”). In support of the Motion, the Applicant states:

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 Section 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.

2. Prior to the Petition Date, the Assignors were engaged in the travel and entertainment business, including operating ocean, river, and expedition cruises and conducting related activities around the world.

3. Pursuant to Florida Statute § 727.108(7), the Assignee retained LPLLC as special counsel to perform necessary legal services pertaining to security and privacy issues, out of state litigation, compliance issues and the sale of certain assets to maximize their value to the Assignment Estates.

4. On March 30, 2022, the Court entered an order approving the employment of LPLLC as special counsel to the Assignee.

5. During the Application Period, LPLLC has, *inter alia*,

(a) successfully resolved the litigation entitled *Mark C. Healy, as Assignee for Crystal Aircruises, LLC v. Marana Aerospace Solutions, Inc., et al.* commenced in the United States District Court, District of Arizona, Case No. 4:21-cv-00520-JAS, which matter is now closed;

(b) represented the Assignee in the litigation matter related to the office lease dated May 28, 2013 with CSHV Wilshire Landmark, LLC (the “Landlord”), which leased to the Crystal Cruises, LLC the premises located at 1175 Wilshire Boulevard, Los Angeles, California. This litigation seeks return of funds improperly drawn by the Landlord on a \$4.8 million Letter of Credit for unjust enrichment, tortious interference and for an accounting. The Complaint bearing case no. 2023-013041-CA-01 was filed in the Circuit Court for the Eleventh Judicial Circuit in and for Miami-Dade County on March 24, 2023; and

(c) assisted the Assignee in connection with the pursuit of claims against former officers and directors of the Assignor.

6. As of June 30, 2023, the cash balance in the estates is \$35,268,740.39 (the “Estate Funds”).

7. LPLLC, as special counsel to the Assignee, has incurred fees in the amount of \$24,887.00 and expenses in the amount of \$1,125.39 for legal services provided to the Assignee during the Application Period as identified in the chart below. LPLLC’s invoices are attached hereto as **Exhibit “A”**. The summary of the fees and expenses incurred are as follows:

SUMMARY OF FEES OF PROFESSIONALS

Partners/Associates & Paraprofessionals	Hours	Rate	Total
Adam Losey (Partner)	29.90	\$545.00	\$16,295.50
Ian Johnson (Associate)	14.30	\$385.00	\$5,505.50
Gabrielle Feulner	6.40	\$365.00	\$2,336.00
Claire Beemer (paralegal)	3.30	\$150.00	\$495.00
Jessica Beasom (paralegal)	1.70	\$150.00	\$255.00
TOTALS			\$24,887.00

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Filing Fee – Case Initiation	\$415.04
Filing Fee – Summons	\$10.35
Service Fee	\$700.00
Total Expenses	\$1,125.39

8. The Assignee respectfully requests that the Court approve this Motion and allow LPLLC an award of fees in the amount of \$24,887.00 and expenses in the amount of \$1,125.39 for the period of January 1, 2023 through June 30, 2023.

WHEREFORE, the Assignee respectfully requests that this Court enter an Order, in the form attached hereto as **Exhibit “B”**, (i) granting the Motion; (ii) approving the Assignee’s request

for \$26,012.39 in compensation for services rendered by LPLLC, (iii) authorizing the Assignee to pay LPLLC \$26,012.39; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: July 31, 2023

BERGER SINGERMAN LLP
Co-Counsel for Assignee
1450 Brickell Avenue, Suite 1900
Miami, FL 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

By: /s/ Samuel J. Capuano
Paul Steven Singerman
Florida Bar No. 378860
singerman@bergersingerman.com
Samuel J. Capuano
Florida Bar No. 90946
scapuano@bergersingerman.com

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 31, 2023 to all parties that have entered an appearance in this case; on counsel for the Assignors, Adam Losey, Esq., Losey PLLC, 1420 Edgewater Drive, Orlando, FL 32804, via email to alosey@losey.law; via email to cb144@jud11.flcourts.org pursuant to CBL Rule 2.2; and via e-mail to all creditors and interested parties on the e-mail service list pursuant to the Notice Procedures Order.

By: /s/ Samuel J. Capuano
Samuel J. Capuano

EXHIBIT A
(Invoices)



INVOICE FOR LEGAL SERVICES

Invoice # 11541311538

Date: 02/05/2023

Due On: 03/07/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	01/17/2023	Telephone conference and correspondence with Citibank counsel regarding matter and next steps regarding same.	0.50	\$545.00	\$272.50
Service	AL	01/18/2023	Communications with client and Citi counsel on matters.	0.20	\$545.00	\$109.00
Quantity Subtotal						0.7

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.7	\$545.00	\$381.50
Subtotal				\$381.50

01211-Healy

General matters.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	01/05/2023	Videoconference with client counsel regarding Logikull review and review of documentation regarding same.	0.50	\$545.00	\$272.50
Service	AL	01/23/2023	Begin Logikull review and document relevance training for privilege review and communications regarding same.	1.20	\$545.00	\$654.00

Service	AL	01/31/2023	Finalize document review regarding privilege assertions and catalog and review as well as multiple communications regarding same and next steps on matters.	1.20	\$545.00	\$654.00
---------	----	------------	---	------	----------	----------

Quantity Subtotal **2.9**

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	2.9	\$545.00	\$1,580.50
Subtotal				\$1,580.50

Quantity Total **3.6**

Subtotal **\$1,962.00**

Total **\$1,962.00**

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39
11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541311803

Date: 03/05/2023

Due On: 04/04/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01158-Healy

Crystal AirCruises, LLC v. Marana

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	02/07/2023	Telephone conference and correspondence with opposing counsel regarding settlement of claims and communications with client regarding same.	0.30	\$545.00	\$163.50
Service	AL	02/20/2023	Communications with client regarding offer and next steps on same as well as with opposing counsel on matters.	0.20	\$545.00	\$109.00
Quantity Subtotal						0.5

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.5	\$545.00	\$272.50
Subtotal				\$272.50

01211-Healy

General matters.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	02/08/2023	Attend hearing via videoconference and communications regarding same.	0.50	\$545.00	\$272.50
Service	AL	02/22/2023	Communications with BastAmron regarding discovery and privilege review per BastAmron request.	0.10	\$545.00	\$54.50

Service	AL	02/23/2023	Review Logikull documentation per client request and communications regarding same and next steps on matters.	0.30	\$545.00	\$163.50
---------	----	------------	---	------	----------	----------

Quantity Subtotal **0.9**

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	0.9	\$545.00	\$490.50
Subtotal				\$490.50

Quantity Total **1.4**

Subtotal **\$763.00**

Total **\$763.00**

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39
11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541312128

Date: 04/05/2023

Due On: 05/05/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Services

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	03/13/2023	Review and revise complaint and analysis on case law and status of same.	0.70	\$545.00	\$381.50
Service	GF	03/14/2023	Draft complaint.	1.00	\$365.00	\$365.00
Service	AL	03/14/2023	Review and revise complaint and exhibits as well as review and analysis regarding same.	0.80	\$545.00	\$436.00
Service	AL	03/15/2023	Meeting with client regarding matters and proposed complaint and research and analysis on long arm jurisdiction as well as internal communications regarding same.	0.50	\$545.00	\$272.50
Service	GF	03/15/2023	Discuss revisions to complaint; correspondence regarding same.	0.20	\$365.00	\$73.00
Service	GF	03/17/2023	Research to support drafting of complaint.	1.00	\$365.00	\$365.00
Service	GF	03/17/2023	Meeting to discuss complaint.	0.60	\$365.00	\$219.00
Service	AL	03/17/2023	Review statutory claims basis and case law regarding same, as well as review of conflict of law issues associated with California and Florida ABC statute parity and comity.	1.20	\$545.00	\$654.00
Service	GF	03/20/2023	Revise complaint.	0.90	\$365.00	\$328.50
Service	AL	03/20/2023	Analysis on California lease issues and case law regarding assignee's claims and communications regarding same.	0.50	\$545.00	\$272.50

Service	AL	03/21/2023	Review California lease complaint and revised cause of action and review of statute regarding same.	0.20	\$545.00	\$109.00
Service	IJ	03/23/2023	Revise and edit complaint and research to support same.	1.00	\$385.00	\$385.00
Service	IJ	03/24/2023	Revise and edit complaint.	0.90	\$385.00	\$346.50
Service	GF	03/24/2023	Continue to revise complaint; correspondence with I. Johnson regarding same.	0.40	\$365.00	\$146.00
Service	GF	03/24/2023	Finalize complaint and prep for filing; correspondence to paralegals regarding same.	0.20	\$365.00	\$73.00
Service	GF	03/24/2023	Finalize and file complaint.	1.00	\$365.00	\$365.00
Service	CB	03/27/2023	Updated docket with Complaint and Civil Cover Sheet. Calendared deadline to serve defendant.	0.10	\$150.00	\$15.00
Service	GF	03/27/2023	Research registered agent and prepare summons.	0.30	\$365.00	\$109.50
Service	GF	03/29/2023	Research procedures for issuance of summons.	0.20	\$365.00	\$73.00
Service	CB	03/31/2023	Correspondence with G. Feulner regarding case initiation and filing.	0.60	\$150.00	\$90.00
Service	GF	03/31/2023	Correct filing to address error message from Clerk; refile Complaint and Civil Cover Sheet.	0.30	\$365.00	\$109.50
Service	AL	04/01/2023	Review sublease and evidence on sublease per client request and communications with client regarding same as well as direction on subpoenas and sublease information.	0.50	\$545.00	\$272.50
Service	CB	04/03/2023	Finalized, filed, and updated docket with "2023-04-03 20 Day Corporate Service Summons To Be Issued By Clerk - CSHV Wilshire Landmark LLC." Added expense to Clio and Xero.	0.20	\$150.00	\$30.00
Service	GF	04/03/2023	Correspondence to client regarding complaint filed and next steps.	0.10	\$365.00	\$36.50
Service	IJ	04/03/2023	Draft third party subpoenas, research in support of same.	1.60	\$385.00	\$616.00
Service	IJ	04/04/2023	Draft third party subpoenas, research in support of same.	0.60	\$385.00	\$231.00
Service	AL	04/04/2023	Review California lease non-party subpoenas and communications regarding same and next steps on matters.	0.50	\$545.00	\$272.50
Service	GF	04/04/2023	Review docket for issued summons; correspondence regarding same.	0.10	\$365.00	\$36.50

Quantity Subtotal 16.2

Services Subtotal \$6,683.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	03/31/2023	Filing fee for case initiation in Miami-Dade County, Mark C Healy v. CSHV Wilshire Landmark LLC. Order no. 7091047.	1.00	\$415.04	\$415.04
Expense	04/03/2023	Fee paid to the Miami-Dade Clerk of Court for filing proposed summons on CSHV Wilshire Landmark LLC. Order no. 7217184.	1.00	\$10.35	\$10.35
Expenses Subtotal					\$425.39

Time Keeper	Position	Quantity	Rate	Total
Gabrielle Feulner	Associate	6.3	\$365.00	\$2,299.50
Ian Johnson	Associate	4.1	\$385.00	\$1,578.50
Adam Losey	Partner	4.9	\$545.00	\$2,670.50
Claire Beemer	Paralegal	0.9	\$150.00	\$135.00
Subtotal				\$7,108.89

01158-Healy**Crystal AirCruises, LLC v. Marana**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	02/22/2023	Communications regarding matter and next steps on same as well as resolution potential.	0.30	\$545.00	\$163.50
Service	AL	03/14/2023	Communications with opposing counsel regarding resolution and next steps regarding same; review proposed settlement terms and court approval conditions regarding same and communications with client.	0.30	\$545.00	\$163.50
Service	AL	04/01/2023	Correspondence regarding matter and settlement regarding same.	0.10	\$545.00	\$54.50
Service	AL	04/02/2023	Review and comment on settlement and communications with client regarding same.	0.30	\$545.00	\$163.50
Service	AL	04/04/2023	Communications with opposing counsel and client regarding same and appointment of Assignee as well as finalization of settlement and payment.	0.30	\$545.00	\$163.50
Quantity Subtotal						1.3

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	1.3	\$545.00	\$708.50
Subtotal				\$708.50
Quantity Total				17.5
Subtotal				\$7,817.39
Total				\$7,817.39

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541312396

Date: 05/05/2023

Due On: 06/04/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Services

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	JB	04/05/2023	Check docket for issued summons, compile service packet; correspondence with A. Losey regarding the same	0.30	\$150.00	\$45.00
Service	AL	04/06/2023	Communications regarding matters and next steps regarding same on on-party subpoenas and service.	0.20	\$545.00	\$109.00
Service	JB	04/06/2023	Revise service packet, correspondence with G. Feulner and I. Johnson regarding the same; and email service packet to process server	0.40	\$150.00	\$60.00
Service	GF	04/06/2023	Advise J. Beasom on service packet.	0.10	\$365.00	\$36.50
Service	IJ	04/06/2023	Address service of process and third party subpoena notices.	0.50	\$385.00	\$192.50
Service	JB	04/10/2023	Correspondence with process server and received proof of service; calendar date to serve non parties subpoenas; correspondence with A. Losey regarding the same	0.20	\$150.00	\$30.00
Service	AL	04/10/2023	Communications with client and co-counsel regarding subpoenas and next steps regarding same.	0.10	\$545.00	\$54.50
Service	CB	04/12/2023	Sent correspondence to the process server requesting clarification on invoice charges.	0.30	\$150.00	\$45.00
Service	CB	04/17/2023	Updated docket with "2023-04-17 Order Setting Initial Case Management Conference and to	0.50	\$150.00	\$75.00

Prepare a Mandatory Case Management Report" and calendared deadlines within.

Service	IJ	04/17/2023	Address issues with service of process and refusal of same.	0.60	\$385.00	\$231.00
Service	AL	04/20/2023	Communications with client and co-counsel regarding matter and communications regarding subtenant and landlord issues.	3.00	\$545.00	\$1,635.00
Service	IJ	04/28/2023	Address service of subpoenas to third parties regarding use and leasing of premises at issue.	0.20	\$385.00	\$77.00

Quantity Subtotal 6.4

Services Subtotal \$2,590.50

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	04/12/2023	Payment made to Diligent Legal Services of Florida, LLC for service of Summons on CSHV Wilshire Landmark, LLC c/o United Agent Group, Inc. Invoice no. #DGT2023001280.	1.00	\$350.00	\$350.00
Expense	04/19/2023	Payment made to Diligent Legal Services for rush service on CSHV Wilshire Landmark, LLC; Invoice no.: 0399	1.00	\$350.00	\$350.00

Expenses Subtotal \$700.00

Time Keeper	Position	Quantity	Rate	Total
Gabrielle Feulner	Associate	0.1	\$365.00	\$36.50
Ian Johnson	Associate	1.3	\$385.00	\$500.50
Adam Losey	Partner	3.3	\$545.00	\$1,798.50
Jessica Beasom	Paralegal	0.9	\$150.00	\$135.00
Claire Beemer	Paralegal	0.8	\$150.00	\$120.00

Quantity Total 6.4

Subtotal \$3,290.50

Total \$3,290.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541312778

Date: 06/05/2023

Due On: 07/05/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	05/01/2023	Communications regarding matters and next steps regarding same.	0.20	\$545.00	\$109.00
Service	JB	05/03/2023	Draft notice of filing affidavit of service, calendar deadline for defendant to serve written defenses; correspondence with A. Losey and I. Johnson regarding the same	0.80	\$150.00	\$120.00
Service	AL	05/03/2023	Review and communications with co-counsel regarding service of process and next steps regarding same.	0.20	\$545.00	\$109.00
Service	AL	05/07/2023	Communications with opposing counsel and client regarding extension request.	0.20	\$545.00	\$109.00
Service	AL	05/15/2023	Review proposal sent by opposition as well as cross-referencing with lease agreements and modifications and preparing correspondence with opposing counsel with line item queries, and communications with client regarding same.	1.00	\$545.00	\$545.00
Service	AL	05/17/2023	Communications with opposing counsel and co-counsel regarding matter and cross-reference of lease provisions associated with matters and next steps regarding same.	0.50	\$545.00	\$272.50
Service	AL	05/22/2023	Communications with opposing counsel regarding Motion to Dismiss, and communications with co-counsel regarding matters and next steps regarding same; review motion to dismiss and opine on jurisdictional arguments.	1.00	\$545.00	\$545.00
Service	CB	05/22/2023	Updated docket with "2023-05-22 CSHV Wilshire Landmark, LLC's Motion To Dismiss."	0.10	\$150.00	\$15.00

Service	IJ	05/22/2023	Review motion to dismiss and begin preparing opposition to same.	0.20	\$385.00	\$77.00
Service	IJ	05/23/2023	Draft response to motion to dismiss and research to support same.	2.70	\$385.00	\$1,039.50
Service	AL	05/24/2023	Prepare for and conduct meeting with client parsing through financials and other documentation as well as legal arguments and suggested next steps on matters.	1.70	\$545.00	\$926.50
Service	IJ	05/24/2023	Draft response to motion to dismiss and research to support same.	2.00	\$385.00	\$770.00
Service	IJ	05/30/2023	Revise and edit response to motion to dismiss.	1.60	\$385.00	\$616.00
Service	AL	05/30/2023	Review response to motion to dismiss and case law cited in support as well as communications regarding same and next steps on matters.	1.70	\$545.00	\$926.50
Quantity Subtotal						13.9

Time Keeper	Position	Quantity	Rate	Total
Ian Johnson	Associate	6.5	\$385.00	\$2,502.50
Adam Losey	Partner	6.5	\$545.00	\$3,542.50
Jessica Beasom	Paralegal	0.8	\$150.00	\$120.00
Claire Beemer	Paralegal	0.1	\$150.00	\$15.00
Subtotal				\$6,180.00

01211-Healy

General matters.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AL	05/20/2023	Review cybersecurity memo and documentation associated with director and officer queries from Bast Amron and other counsel, as well as communications regarding same.	2.50	\$545.00	\$1,362.50
Service	AL	05/22/2023	Communications with co-counsel at Bast Amron per request on matters.	0.20	\$545.00	\$109.00
Service	AL	05/23/2023	Videoconference with Assignee counsel regarding issues per Assignee counsel request.	0.80	\$545.00	\$436.00
Quantity Subtotal						3.5

Time Keeper	Position	Quantity	Rate	Total
Adam Losey	Partner	3.5	\$545.00	\$1,907.50
Subtotal				\$1,907.50
Quantity Total				17.4
Subtotal				\$8,087.50
Total				\$8,087.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39
11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC



INVOICE FOR LEGAL SERVICES

Invoice # 11541313036

Date: 07/05/2023

Due On: 08/04/2023

Losey PLLC

1420 Edgewater Drive
Orlando, Florida 32804
losey.law

Assignee Mark Healy

01117-Healy

California lease.

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	CB	06/01/2023	Finalized Response to Motion to Dismiss.	0.60	\$150.00	\$90.00
Service	IJ	06/01/2023	Finalize and file response to motion to dismiss.	0.50	\$385.00	\$192.50
Service	AL	06/01/2023	Review, finalize, and approve of filing of final response to motion to dismiss and communications with opposing counsel regarding same and next steps on matters.	0.30	\$545.00	\$163.50
Service	AL	06/02/2023	Communications with opposing counsel and client regarding matter as well as review of leases and credit agreements with cross-reference of same.	1.20	\$545.00	\$654.00
Service	CB	06/07/2023	Updated docket with "2023-06-01 Plaintiffs Opposition to Defendant's Motion to Dismiss" and calendared deadline for Defendant to reply.	0.10	\$150.00	\$15.00
Service	AL	06/07/2023	Review Rely and analysis of same and case law in support.	1.20	\$545.00	\$654.00
Service	CB	06/07/2023	Updated docket with "2023-06-06 Reply to Plaintiffs Opposition to CSHV Wilshire Landmark, LLC's Motion to Dismiss."	0.10	\$150.00	\$15.00
Service	IJ	06/07/2023	Review reply in support of motion to dismiss and correspondence regarding same.	0.40	\$385.00	\$154.00
Service	IJ	06/08/2023	Research regarding court's exercise of personal jurisdiction in turnover actions.	0.60	\$385.00	\$231.00
Service	CB	06/22/2023	Updated docket with "2023-06-21 Verified Motion for Admission of Eric D. Goldberg to Appear Pro Hac Vice Pursuant to Florida Rule of Judicial	0.10	\$150.00	\$15.00

Administration 2.510."						
Service	AL	06/25/2023	Communications with opposing counsel regarding matter and review order regarding same.	0.20	\$545.00	\$109.00
Service	IJ	06/26/2023	Draft joint case management report and correspondence regarding same.	0.90	\$385.00	\$346.50
Service	CB	06/26/2023	Finalized, filed, and updated docket with "2023-06-26 Joint Case Management Report." Uploaded to courtMAP for judge's review.	0.60	\$150.00	\$90.00
Service	AL	06/26/2023	Multiple telephone conferences and correspondence with opposing counsel regarding matter and next steps regarding same, as well as drafting and sending case management report and order and filing of same per Court's order, as well as telephone conference with co-counsel.	2.20	\$545.00	\$1,199.00
Service	AL	06/27/2023	Communications with opposing counsel on claims and settlement, as well as overstated numbers by opposition on alleged rents and build out charges.	0.30	\$545.00	\$163.50
Quantity Subtotal						9.3

Time Keeper	Position	Quantity	Rate	Total
Ian Johnson	Associate	2.4	\$385.00	\$924.00
Adam Losey	Partner	5.4	\$545.00	\$2,943.00
Claire Beemer	Paralegal	1.5	\$150.00	\$225.00

Quantity Total	9.3
Subtotal	\$4,092.00
Total	\$4,092.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541311538	03/07/2023	\$1,962.00	\$0.00	\$1,962.00
11541311803	04/04/2023	\$763.00	\$0.00	\$763.00
11541312128	05/05/2023	\$7,817.39	\$0.00	\$7,817.39

11541312396	06/04/2023	\$3,290.50	\$0.00	\$3,290.50
11541312778	07/05/2023	\$8,087.50	\$0.00	\$8,087.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11541313036	08/04/2023	\$4,092.00	\$0.00	\$4,092.00
Outstanding Balance				\$26,012.39
Total Amount Outstanding				\$26,012.39

Please make all amounts payable to: Losey PLLC

EXHIBIT B
(Proposed Order)

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.

**ORDER GRANTING MOTION FOR APPROVAL AND PAYMENT
OF FEES INCURRED BY LOSEY PLLC AS SPECIAL COUNSEL TO THE
ASSIGNEE FOR THE PERIOD JANUARY 1, 2023 THROUGH JUNE 30, 2023**

THIS CAUSE came before the Court upon the *Motion for Approval and Payment of Fees Incurred by Losey PLLC as Special Counsel to the Assignee for the Period January 1, 2023 Through June 30, 2023* (the “Motion”), filed on negative notice by 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”), pursuant to which Losey PLLC seeks compensation in the amount of \$24,887.00 in fees and \$1,125.39 in expenses for a total ward of \$26,012.39 for the period of January 1, 2023 through June 30, 2023. The Court, having considered the Motion and the record in this proceeding, noting

that no objection to the Motion was filed by any party, finding that notice of the Motion and the hearing was sufficient, and good cause appearing, it is hereby

ORDERED that:

1. The Motion is **GRANTED**.
2. Losey PLLC, as special counsel to the Assignee, is awarded fees in the amount of \$24,887.00 and expenses in the amount of \$1,125.39, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Losey PLLC the sum of \$26,012.39.
4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered and expenses incurred by Losey PLLC for the benefit of the assignment estate.

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

HONORABLE LISA S. WALSH
Circuit Court Judge

Copies furnished to:

Counsel of record