

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

To: Assignors,

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

**MOTION FOR APPROVAL OF FEES AND EXPENSES INCURRED BY
NARDELLA & NARDELLA, PLLC, AS 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 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, Michael A. Nardella, Esq. and Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Blvd., Ste. 300, Orlando, FL 32801, 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.

NARDELLA & NARDELLA, PLLC (“Applicant”), 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 interim fees in the amount of \$120,153.00 and reimbursement of expenses in the amount of \$3,859.10, for a total award of \$124,012.10, incurred in connection with its representation of Mark C. Healy (“Assignee”), in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC (“Crystal Cruises” or the “Assignor” and referred to together with Crystal Holdings U.S. LLC (“Crystal Holdings”), and Crystal Aircruises LLC (“Crystal Aircruises”) collectively as the “Assignors”) 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 (individually referred to as an “Assignment Case” and collectively as the “Assignment Cases”).

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 Applicant was retained as co-counsel, along with Berger Singerman LLP, by the Assignee to perform all legal activities required for the benefit of the estates.

4. As a result of the efforts by the Assignee and the Applicant, the Assignee initiated the following supplemental proceeding seeking the recovery of amounts owed to the estate, *Mark C. Healy v. Resorts World Miami, LLC*, Case No. 2022-020599-CA-01 (the “Supplemental Proceeding”). The Applicant conducted pre-suit negotiations and issued demands for payment prior to the filing of the Supplemental Proceeding, conducted significant research in connection with its preparation of the Complaint filed in the Supplemental Proceeding, and has continued to diligently prosecute the Supplemental Proceeding throughout the Application Period including reviewing, researching and drafting pleadings in the matter.

5. The Applicant also expended a significant amount of time reviewing numerous claims for unpaid wages, reviewing them for potential objections, conducting research where necessary and preparing objections that the Assignee anticipates filing.

6. During the Application Period, Applicant also provided additional reasonable and necessary services to the Assignment estates including, without limitation, the following:

(a) assisted with the continued evaluation of the assets of the estate and potential claims available to the Assignment Estate, including without limitation, the Supplemental Proceeding;

(b) prepared for and attended status calls with the Assignee on a weekly basis to discuss the Assignee’s efforts to market and sell the assets of Assignors and all other matters affecting the administration of the Assignment Estates;

(c) reviewed various claims filed against the Assignment Estates by consumer creditors and communicated with creditors;

(d) reviewed various wage claims filed against the Assignment Estates by individuals, prepared objections to certain claims and engaged in negotiations with certain of the claimants;

(e) attended one or more case management hearings and supported the preparation of co-counsel for others;

(f) communicated with creditors and the Assignee's team to discuss the status of these Assignment Cases;

(g) reviewed and analyzed available assets for collection upon successful prosecution of the Assignment Estates' claims;

(h) supported the efforts of the Assignee's special counsel in Belgium in prosecuting Assignee's interest in an action brought by the Assignor in the Belgium Maritime Court prior to the Assignment Date and interacted with special counsel to facilitate progress on the matter on behalf of Assignee;

(i) reviewed voluminous discovery, researched relevant legal issues, prepared a mediation statement, attended mediation and negotiated and prepared a settlement agreement in the Resorts World matter, which in the event of Court approval will result in a recovery to the Assignment Estates of \$3,250,000;

(j) prepared for and attended mediation in a matter concerning former directors and officers of the Assignor with special counsel, assisted in the preparation of a term sheet, and draft settlement agreement, which in the event of Court approval will result in a recovery to the Assignment Estates of \$15,500,000;

(k) engaged in communications with various claimants regarding status of their proofs of claims; and

(l) reviewed and/or prepared objections to other non-consumer and non-employee claims.

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

8. The Applicant, as counsel to the Assignee, has incurred fees in the amount of \$120,153.00 for legal services provided to the Assignee during the Application Period as identified in the chart below and expenses in the amount of \$3,859.10 (for a total of \$124,012.10) in the nature of recording fees, document production data storage, and photocopy charges. Applicant’s invoice is 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
Paul N. Mascia	145.5	\$425.00	\$61,842.50
Michael A. Nardella	22.4	\$450.00	\$10,080.00
Keenan Smith	48.5	\$250.00	\$12,125.00
Matthew Silbernagel	126.4	\$250.00	\$31,600.00
Karen Cooper	18.9	\$225.00	\$4,230.00
Stephen Nardella	1.3	\$135.00	\$175.50
Joann Quinn	1.0	\$100.00	\$100.00
TOTALS	126.6		\$120,153.00

SUMMARY OF EXPENSES INCURRED

Type of Expense	Amount of Expense
Document Production Data Storage	\$3,211.69
Recording Fees	\$32.00
Postage	\$29.88
Hotel accommodations for 2-day Mediation	\$585.53
Total Expenses	\$3,859.10

9. Given the nature of these proceedings, and the amount of work that went into representing the Assignee during the Application Period, the Applicant respectfully requests that the Court approve this Application and allow the Applicant an award of fees in the amount of \$120,153.00 and reimbursement of expenses in the amount of \$3,859.10, for a total of \$124,012.10 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 Applicant’s request for compensation for services rendered in the amount of **\$120,153.00** and reimbursement of expenses in the amount of **\$3,859.10**, (iii) authorizing the Assignee to pay the Applicant the sum of **\$124,012.10** representing the fees and expenses awarded; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: July 31, 2023

NARDELLA & NARDELLA, PLLC
Co-General Counsel for Assignee
135 W. Central Blvd., Ste. 300
Orlando, FL 32801
Telephone: (407) 966-2680

By: /s/ Paul N. Mascia

Michael A. Nardella, Esq.
Florida Bar No. 051265
Paul N. Mascia
Florida Bar No. 0489670
mnardella@nardellalaw.com
pmascia@nardellalaw.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/ Paul N. Mascia
Paul N. Mascia, Esq.

EXHIBIT 1
(Invoices)



INVOICE

Invoice # 12125
Date: 03/02/2023

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
02/01/2023	PNM	Preparing for and attending conference with resorts world counsel and mediator	0.60
02/02/2023	MN	Review request for [REDACTED] and call with DO counsel re same	0.40
02/02/2023	PNM	Reviewing notice of appearance for counsel for distributions bmb 1985 sec	0.10
02/03/2023	MN	Emails with special counsel for D&O coverage regarding [REDACTED]	0.10
02/03/2023	MN	Call with special counsel regarding [REDACTED]	0.60
02/03/2023	KC	Receipt and review of Notice of Hearing on Motion for Entry of Order Approving Procedures; and calendar.	0.10
02/03/2023	PNM	Initial review of matter in preparation for presuit mediation strategy	0.20
02/03/2023	PNM	Reviewing notice of hearing for motion for order approving claims procedures	0.10
02/05/2023	MN	Emails with special counsel regarding [REDACTED]	0.10
02/06/2023	MN	Review and respond to emails regarding [REDACTED]	0.10
02/06/2023	MN	Prepare for and attend call with client and co-counsel regarding [REDACTED]	0.70

[REDACTED]			
02/07/2023	PNM	Reviewing notice of appearance for counsel for national union fire insurance co.	0.10
02/07/2023	PNM	Correspondence from and to counsel for claimant ceyhan	0.10
02/07/2023	PNM	Correspondence from resorts world mediator re engagement letter and reviewing same	0.10
02/07/2023	PNM	Correspondence to client re [REDACTED]	0.10
02/08/2023	KC	Receipt and review of Notices of Taking Depositions; and calendar.	0.40
02/08/2023	MN	Review order on settlement agreement with PBGC and effect on estate	0.10
02/08/2023	KC	Receipt and review of Notice of Cancellation of Hearing and Re-Notice of Hearing; and update calendar.	0.10
02/08/2023	PNM	Preparing for and attending hearing on motions for interim compensation	0.90
02/08/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
02/09/2023	KC	Receipt and review of Orders Granting Motions for Approval of Fees.	0.10
02/09/2023	PNM	Correspondence to belgium counsel re matter status update	0.10
02/09/2023	PNM	Correspondence from and to claimant pitts re claim status	0.10
02/09/2023	PNM	Reviewing correspondence to client re [REDACTED]	0.10
02/09/2023	PNM	Reviewing notice of filing subpoenas duces tecum for insurance claimants	0.10
02/09/2023	PNM	Correspondence from and to resorts world mediator	0.10
02/09/2023	PNM	Reviewing mediation agreement for resorts world and correspondence to mediator delivering same	0.10
02/09/2023	PNM	Reviewing amended notice of hearing for motion for order approving claims procedures	0.10
02/10/2023	PNM	Reviewing executed order approving pbgc settlement	0.10
02/13/2023	MN	Review task list of outstanding items	0.10
02/13/2023	MN	Call regarding [REDACTED]	0.10
02/13/2023	PNM	Reviewing matter re inbound wire transfer	0.10
02/13/2023	PNM	Correspondence from and to co-counsel re client conference	0.10
02/13/2023	PNM	Reviewing investors travel request for copies of subpoenaed documents	0.10
02/13/2023	PNM	Reviewing matter re netherlands trustee demands for documents and related call from florida attorney	0.10
02/14/2023	PNM	Correspondence from and to client re belgium matter	0.10

02/14/2023	PNM	Correspondence from resorts world counsel re mediation agreement	0.10
02/14/2023	PNM	Initial review of kanter proof of claim and related issues	0.40
02/14/2023	PNM	Telephone call to virgin islands representative	0.10
02/15/2023	PNM	Reviewing notices of filing assignee filing of affidavits of service for orders granting pbgc settlement and granting interim compensation applications	0.10
02/15/2023	PNM	Correspondence from and to debtor counsel re herborn claim	0.10
02/15/2023	PNM	Telephone conference with counsel for claimant kaplenstien re claim status	0.20
02/16/2023	MN	Review allegations related to liability of LLC for unequal distribution	0.40
02/16/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
02/17/2023	PNM	Reviewing belgium counsel response to court surveyor	0.20
02/17/2023	PNM	Correspondence from and to belgium counsel re matter status and next steps in litigation	0.10
02/17/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
02/17/2023	PNM	Correspondence from co-counsel re estate administration status conference	0.10
02/20/2023	KC	Review O&E report and deeds as to legal description for shrine building.	0.20
02/20/2023	MRS	Review and confirm legal Description for Notice of Lis Pendens against 1401-1417	0.80
02/20/2023	PNM	Instructions to attorney silbernagel re lis pendens in resorts world matter	0.10
02/22/2023	KC	Confirm Zoom instructions for 2/27 hearing.	0.10
02/22/2023	PNM	Correspondence from d&o counsel re [REDACTED]	0.10
02/22/2023	PNM	Correspondence from d&o counsel re [REDACTED]	0.10
02/22/2023	PNM	Reviewing court notice re case management hearing	0.10
02/23/2023	MN	Call with client regarding [REDACTED]	0.10
02/23/2023	MN	Prepare for and attend meeting regarding demand so Dutch trustee	0.70
02/23/2023	KC	Electronically file Notice of Lis Pendens.	0.20
02/23/2023	PNM	Correspondence from and to d&o counsel [REDACTED]	0.10
02/23/2023	PNM	Preparing lis pendens for resorts world matter and instructions to staff re same	0.40
02/23/2023	PNM	Reviewing filed lis pendens and instructions to staff re recording of same	0.10
02/23/2023	PNM	Correspondence from assignor counsel re [REDACTED]	0.10
02/24/2023	KC	Prepare service email re: Notice of Lis Pendens.	0.10

02/24/2023	KC	Receipt and review of Notices of Taking Depositions; and calendar.	0.20
02/24/2023	PNM	Reviewing filed notice of lis pendens re resorts world matter	0.10
02/24/2023	PNM	Reviewing notices of depositions for various travel insurers	0.10
02/27/2023	PNM	Telephone conference with client re [REDACTED]	0.30
02/27/2023	PNM	Preparation for and attendance at case management hearing and hearing on motion to approve claims procedure	0.90
02/27/2023	PNM	Reviewing matter re status of recorded lis pendens for resorts world matter	0.10
02/27/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
02/27/2023	PNM	Reviewing order granting motion to approve claim procedures	0.10
02/27/2023	PNM	Correspondence from mediator	0.10
02/27/2023	PNM	Preparing for and attending teleconference with client re [REDACTED]	0.70
02/27/2023	PNM	Telehpone conference with client re [REDACTED]	0.40
02/28/2023	PNM	Reviewing executed order approving expedited claims procedure	0.10
Quantity Subtotal			15.2
Services Subtotal			\$6,107.50

Expenses

Date	Description	Quantity	Rate	Total
02/23/2023	Miami Dade clerk - Lis Pendens recording fee (FL E-filing Portal.)	1.00	\$18.00	\$18.00
Expenses Subtotal				\$18.00

Time Keeper	Quantity	Rate	Total
Paul Mascia	9.4	\$425.00	\$3,995.00
Michael A. Nardella	3.5	\$450.00	\$1,575.00
Matthew Silbernagel	0.8	\$250.00	\$200.00
Karen Cooper	1.5	\$225.00	\$337.50
Quantity Total			15.2
Subtotal			\$6,125.50
Total			\$6,125.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11778	02/01/2023	\$16,602.50	\$0.00	\$16,602.50
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55
12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
Outstanding Balance				\$84,816.57
Total Amount Outstanding				\$84,816.57

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00

02/13/2023	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$48,432.84	\$48,432.84
02/14/2023		Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26		\$37,097.58
02/14/2023		Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78		\$32,760.80
02/14/2023		Payment for invoice #11200	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50		\$16,222.30
02/14/2023		Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80		\$4,777.50
02/14/2023		Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50		\$0.00
IOLTA Trust Account Balance						\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12125
Date: 03/02/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.



INVOICE

Invoice # 12377
Date: 05/04/2023

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
03/01/2023	PNM	Reviewing matter re recordation of lis pendens	0.10
03/01/2023	PNM	Correspondence from client re [REDACTED]	0.10
03/02/2023	MRS	Review resorts world Mediation Statement re [REDACTED] and consideration of related issues	0.40
03/02/2023	MRS	Research [REDACTED]	0.90
03/02/2023	MRS	Read and review legal issues in preparation of mediation position	0.20
03/02/2023	MRS	Review Mediation Statement regarding [REDACTED] argument	0.40
03/02/2023	MRS	Research [REDACTED] cases in preparation of resorts world mediation	1.70
03/02/2023	MRS	Summarize research on [REDACTED] in preparation of mediation	0.40
03/02/2023	MN	Prepare for mediation with Resorts World and specifically review law [REDACTED]	0.80
03/02/2023	MRS	Research and analysis of [REDACTED] in preparation of resorts world premediation memorandum	1.80

03/02/2023	MRS	Research standard for [REDACTED] Read and review [REDACTED]	0.90
03/02/2023	MRS	Draft summary of research pertaining to [REDACTED]	0.80
03/02/2023	PNM	Reviewing matter re presuit mediation with d&o insurer	0.10
03/02/2023	PNM	Reviewing first omnibus objection to consumer claims	0.10
03/02/2023	PNM	Instructions to attorney smith re revisions to omnibus wage claim objections re order approving expedited claims procedure	0.20
03/02/2023	PNM	Reviewing affidavit of service of summons upon client in connection with forresters matter	0.10
03/02/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
03/02/2023	PNM	Review and analysis of resorts world miami mediation statement and related arguments; preparing memo to file re same	0.80
03/02/2023	PNM	Reviewing [REDACTED] in preparation of mediation	0.30
03/02/2023	PNM	Research and review of cases re [REDACTED]	0.40
03/02/2023	PNM	Correspondence from and to mediator	0.10
03/02/2023	PNM	Telephone conference with co-counsel regarding [REDACTED]	0.10
03/02/2023	PNM	Preparing damages calculation in advance of mediation including researching [REDACTED] preparing memo to file re same	0.40
03/02/2023	PNM	Research and review of cases re [REDACTED] preparing memo to file re same	0.70
03/02/2023	PNM	Reviewing [REDACTED] and preparing memo to file re same	0.40
03/02/2023	PNM	Reviewing [REDACTED] and related application to defendant position and preparing memo to file re same	0.70
03/02/2023	PNM	Preparing arguments and position for mediation and related preparation for substantive premediation conference with mediator	0.60
03/02/2023	PNM	Preparing memorandum to client re analysis of [REDACTED] of mediation position [REDACTED] counter arguments and mediation strategy	0.40
03/03/2023	KC	Check official records and retrieve recorded copy of Lis Pendens; and email copy of same to client.	0.20
03/03/2023	MRS	Research re resorts world matter case law regarding [REDACTED] and preparing memo re same in preparation of mediation	2.30

03/03/2023	MRS	Further preparation of memo re [REDACTED] preparation of resorts world mediation	0.60
03/03/2023	MRS	Review and research of additional legal issues in resorts world matter	0.40
03/03/2023	PNM	Telephone call to client re [REDACTED]	0.10
03/03/2023	PNM	Reviewing cases re [REDACTED] [REDACTED]	0.50
03/03/2023	PNM	Preparing for and attending premediation conference with mediator	0.80
03/03/2023	PNM	Reviewing recorded lis pendens against resorts world miami property	0.10
03/04/2023	PNM	Telephone conference with client [REDACTED]	0.70
03/05/2023	KS	Review court procedures order for integration into claim objections	0.40
03/05/2023	KS	Review and amend omnibus wage order including integrated court procedures	0.80
03/05/2023	KS	Revise objection to claim of Evelyn Fernandez including court procedures and updated negative notice, among other revisions	0.40
03/06/2023	MN	Review outcome of mediation and continuance of same	0.30
03/06/2023	PNM	Preparing for and attending mediation with resorts world miami	5.30
03/06/2023	PNM	Correspondence from and to d&o counsel re resorts world mediation [REDACTED]	0.10
03/06/2023	PNM	Correspondence from and to mediator re continuation of mediation	0.10
03/06/2023	PNM	Reviewing documents from assignee re [REDACTED] [REDACTED]	0.10
03/06/2023	PNM	Reviewing mediation and next steps in matter and telephone conference with client re [REDACTED]	0.70
03/07/2023	PNM	Correspondence to client re [REDACTED]	0.10
03/07/2023	PNM	Correspondence to d&o counsel re [REDACTED]	0.10
03/07/2023	PNM	Correspondence from and to d&o counsel re [REDACTED] [REDACTED]	0.30
03/07/2023	PNM	Correspondence from and to mediator and resorts world counsel re informal discovery requests	0.10
03/07/2023	PNM	Telephone confernece with client re [REDACTED]	0.30
03/08/2023	PNM	Telephone conference with d&o counsel [REDACTED] [REDACTED]	0.90
03/08/2023	PNM	Telephone conference with mediator	0.20
03/08/2023	PNM	Preparing memo to resorts world counsel re mediation impasse	0.20
03/08/2023	PNM	Correspondence to client re ediscovery issues	0.10
03/08/2023	PNM	Correpondence from d&o counsel re [REDACTED]	0.10

03/08/2023	PNM	Reviewing matter re asignor [REDACTED] re building improvement agreement	0.40
03/08/2023	PNM	Preparing memorandum to client re [REDACTED] [REDACTED]	0.30
03/08/2023	PNM	Reviewing second omnibus objection to consumer claims	0.10
03/10/2023	KC	Phone call to Logikcull re: monthly basis pricing.	0.30
03/10/2023	KC	Email correspondence with Logikcull re: details to get estimate cost.	0.10
03/10/2023	KC	Phone call form Logikcull product specialist to go over subscription models.	0.30
03/10/2023	PNM	Telephone conference from mediator re resumption of mediation	0.20
03/10/2023	PNM	Correspondence from and to d&o counsel re [REDACTED] [REDACTED]	0.10
03/10/2023	PNM	Reviewing matter re option to utilize logikcull for ediscovery software platform	0.20
03/13/2023	SN	Upload discovery files.	0.50
03/13/2023	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
03/13/2023	PNM	Reviewing matter re discovery software for resorts world matter	0.20
03/13/2023	PNM	Correspondence from mediator	0.10
03/13/2023	PNM	Correspondence from and to discovery software provider re resorts world matter	0.10
03/14/2023	KC	Confer with attorney re: status of readiness for omnibus wage objection.	0.10
03/14/2023	KC	Receipt and review of Notices of Taking Deposition Duces Tecum.	0.20
03/14/2023	PNM	Correspondence to client re [REDACTED]	0.10
03/14/2023	PNM	Correspondence from special counsel re [REDACTED]	0.10
03/14/2023	PNM	Reviewing and revising supplemental complaint for california lease matter	0.70
03/14/2023	PNM	Reviewing notices of taking depositions duces tecum of travel insurers	0.10
03/14/2023	PNM	Correspondence from belgium counsel and to client re [REDACTED]	0.10
03/15/2023	PNM	Reviewing third omnibus objection to consumer proofs of claim	0.10
03/15/2023	MRS	Discovery document organization and prep.	0.40
03/15/2023	PNM	Correspondence from and to nextpoint re resorts world matter and reviewing related agreement	0.20
03/15/2023	PNM	Telephone conference with nextpoint re importing data for resorts world matter	0.20
03/15/2023	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
03/15/2023	PNM	Correspondence from and to mediator	0.10

03/15/2023	PNM	Correspondece from d&o counsel re [REDACTED]	0.10
03/16/2023	SN	Various emails with discovery document organization regarding upload of large sum of discovery documents.	0.60
03/16/2023	PNM	Corresondence from client and belgium counsel re matter status	0.10
03/16/2023	PNM	Reviewing order on forresters matter	0.10
03/16/2023	PNM	Reviewing fourth omnibus objectiont o consumer claims	0.10
03/16/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
03/17/2023	PNM	Telephone conference with special counsel re [REDACTED]	0.70
03/20/2023	MN	Call regarding omnibus objection and access to Sharepoint files	0.30
03/20/2023	MN	Call with client and co-counsel regarding [REDACTED]	0.60
03/20/2023	MN	Call regarding claims procedure for employee claims	0.30
03/20/2023	MN	Review claims objection procedures order	0.10
03/20/2023	KS	Review objection to claim of Evelyn Fernandez and correspondence with Ms. Fernandez	0.10
03/20/2023	PNM	Reviewing status of resorts world matter and [REDACTED]	0.40
03/20/2023	PNM	Telephone conference with co-counsel re [REDACTED]	0.20
03/20/2023	PNM	Correspondence from and loan broker re refi status	0.10
03/20/2023	PNM	Telephone call to client re refi status	0.20
03/20/2023	PNM	Preparing for and attending telephone conference with client re [REDACTED]	0.70
03/20/2023	PNM	Reviewing matter discovery production upload	0.10
03/20/2023	PNM	Telephone conference with client re [REDACTED]	0.20
03/20/2023	PNM	Preparing first omnibus objection to wage claims	0.60
03/20/2023	PNM	Preparing objection to ferandez claim	0.30
03/21/2023	SN	Reviewing matter discovery production upload.	0.10
03/21/2023	KS	Correspondence with Paul Mascia and Mark Healy	0.10
03/21/2023	PNM	Reviewing pleading in claimaint alevy ancillary litigaiton.	0.10
03/21/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
03/21/2023	PNM	Reviewing assignee limited objection to extension of case management	0.10

deadlines in forester matter			
03/22/2023	KS	Collate docs for attachment to claim objection of Evelyn Fernandez with filing correspondence to paralegal and attorney Mascia	0.20
03/22/2023	KS	Conference call with Mark Healy and Paul Mascia	0.70
03/22/2023	KS	Revise omnibus claim objection	0.20
03/22/2023	PNM	Correspondence from and to client re omnibus wage objection	0.10
03/22/2023	PNM	Reviewing fifth omnibus objection to consumer claims	0.10
03/22/2023	PNM	Correspondence to client re details for data backup for assignor data	0.10
03/22/2023	PNM	Reviewing matter re [REDACTED] and correspondence to client re [REDACTED] for same	0.20
03/22/2023	PNM	Reviewing matter re alevy demanda and related telephone call from family member	0.10
03/22/2023	PNM	Review and analysis applicable bankruptcy rules and local rules in preparation of reply to dsk response to objection to dsk claim, reviewing related docket entries, reviewing dsk claim and preparing introduction and legal issues portion of reply	1.30
03/22/2023	PNM	Instructions to staff re fernandez claim and reviewing related supplement	0.10
03/22/2023	PNM	Reviewing mulburger severance agreement and preparing objection to related proof of claim	0.40
03/22/2023	PNM	Telephone conference with client re [REDACTED]	1.30
03/23/2023	KC	Review court notification and calendar Interim Case Management Conference.	0.10
03/23/2023	KC	Create exhibit pages; combine exhibits and electronically file Evelyn Fernandez Claim Objection.	0.30
03/23/2023	KC	Prepare service email re: Evelyn Fernandez Claim Objection and provide instructions to staff for mailing.	0.20
03/23/2023	SN	Reviewing matter discovery production upload.	0.10
03/23/2023	PNM	Telephone confernece with attorney merkowitz re [REDACTED]	0.40
03/23/2023	PNM	Correspondence from and to co-counsel re fernandez claim	0.10
03/23/2023	PNM	Reviewing sixth omnibus objection to consumer claims	0.10
03/23/2023	PNM	Reviewing filed objection to fernandez claim and instructions to staff re service of same	0.10
03/23/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
03/24/2023	MN	Call with assignee regarding [REDACTED]	0.10

03/24/2023	PNM	Reviewing notice cancelling interim case management hearing	0.10
03/24/2023	PNM	Correspondence from debtor counsel re buckles claim	0.10
03/27/2023	KC	Review court notification rescinding cancellation of interim case management conference; and update calendar.	0.10
03/27/2023	MRS	Reviewing and analysis of [REDACTED] document production	0.30
03/27/2023	MN	Call regarding [REDACTED]	0.30
03/27/2023	MN	Call with client and co-counsel regarding [REDACTED]	0.70
03/27/2023	MRS	Review proffered documents with search terms [REDACTED]	1.20
03/27/2023	MRS	Review and analysis of [REDACTED] documents pertaining to [REDACTED] in preparation of continued resorts world mediation and preparing memo to file re same	2.60
03/27/2023	MRS	Review and analysis of [REDACTED] and related documents pertaining to [REDACTED] in preparation of continued resorts world mediation and preparing memo to file re same	0.90
03/27/2023	MRS	Review email chain in proffered documents pertaining to [REDACTED] in preparation of continued resorts world mediation and preparing memo to file re same	0.80
03/27/2023	MRS	Further review of [REDACTED] note and summarize relevant [REDACTED] in preparation of continued resorts world mediation and preparing memo to file re same	2.10
03/27/2023	KS	Revise omnibus employee claims objections with explanation of changes to attorney Paul Mascia	1.80
03/27/2023	PNM	Initial review of documents produced by client re [REDACTED] instructions to attorney silbernagel re same	0.30
03/27/2023	PNM	Reviewing correspondence to client re [REDACTED]	0.10
03/27/2023	PNM	Reviewing court notice re resumption of case management conference	0.10
03/27/2023	PNM	Reviewing seventh and eighth omnibus objections to consumer claims	0.10
03/27/2023	PNM	Telephone conference with client re [REDACTED]	0.30
03/27/2023	PNM	Reviewing status of various estate matters in preparation for client status conference	0.40
03/27/2023	PNM	Further preparation of omnibus wage objection	0.20
03/27/2023	PNM	Correspondence from and to alevy counsel re [REDACTED]	0.20
03/27/2023	PNM	Telephone conference with client re [REDACTED]	0.40

				and related matters
03/27/2023	PNM	Reviewing status of fernandez objection and next tasks re same	0.10	
03/27/2023	PNM	Preparing omnibus wage objection	0.20	
03/28/2023	MRS	Finalize review of [REDACTED] in preparation of continued resorts world mediation and preparing memo to file re same	2.70	
03/28/2023	PNM	Preparing for and attending telephone conference with client re resorts world matter and related correspondence and documentation for same	0.70	
03/28/2023	PNM	Correspondence from and to client re [REDACTED]	0.10	
03/29/2023	KC	Receipt and review of Order Setting Interim Case Management Conferences; and calendar all.	0.20	
03/29/2023	PNM	Reviewing case management order	0.10	
03/29/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10	
03/31/2023	MN	Call regarding documents found in LA office	0.60	
			Quantity Subtotal	66.6
			Services Subtotal	\$22,973.00

Expenses

Date	Description	Quantity	Rate	Total
03/23/2023	E108 Postage: Service for Mailing Assignee's Objection to Claim of Evelyn Fernandez.	1.00	\$0.84	\$0.84
			Expenses Subtotal	\$0.84

Time Keeper	Quantity	Rate	Total
Paul Mascia	32.6	\$425.00	\$13,855.00
Michael A. Nardella	4.1	\$450.00	\$1,845.00
Matthew Silbernagel	21.8	\$250.00	\$5,450.00
Karen Cooper	2.1	\$225.00	\$472.50
Stephen Nardella	1.3	\$135.00	\$175.50
Keenan Smith	4.7	\$250.00	\$1,175.00
		Quantity Total	66.6
		Subtotal	\$22,973.84
		Total	\$22,973.84

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11778	02/01/2023	\$16,602.50	\$0.00	\$16,602.50
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55
12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
Outstanding Balance				\$84,816.57
Total Amount Outstanding				\$84,816.57

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00

10/03/2022	Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00	\$0.00
02/13/2023	Incoming Wire	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$48,432.84	\$48,432.84
02/14/2023	Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26	\$37,097.58
02/14/2023	Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78	\$32,760.80
02/14/2023	Payment for invoice #11200	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50	\$16,222.30
02/14/2023	Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80	\$4,777.50
02/14/2023	Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50	\$0.00
IOLTA Trust Account Balance				\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12377
Date: 05/04/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.



INVOICE

Invoice # 12378
Date: 05/04/2023

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
04/03/2023	KS	Revise employment claim objections	0.80
04/03/2023	MN	Review complaint to recover letter of credit funds	0.40
04/03/2023	MN	Call with co-counsel regarding [REDACTED]	0.60
04/03/2023	KS	Call with Jack Pitcher re [REDACTED]	0.70
04/03/2023	PNM	Preparing omnibus wage objection and reviewing related facts and bases for various objections	0.40
04/04/2023	KS	Review employee claim objections with Jack Pitcher	1.10
04/04/2023	KS	Further review and analyze employee claims with Jack Pitcher	0.40
04/04/2023	KS	Revise omnibus employee claim objections and add objection to claim 2426.	1.90
04/04/2023	KS	Correspondence with attorney Mascia re revisions to employee claims objections	0.10
04/04/2023	PNM	Preparing omnibus wage objection	0.20
04/04/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10

04/04/2023	PNM	Reviewing motion for authorization to destroy records	0.10
04/05/2023	KC	Receive and review multiple Notices of Taking Deposition.	0.10
04/05/2023	PNM	Reviewing deposition notices for travel insurers	0.10
04/06/2023	PNM	Correspondence from d&o counsel re [REDACTED]	0.10
04/07/2023	PNM	Reviewing resorts world matter and next mediation	0.40
04/09/2023	PNM	Reviewing third party subpoenas for supplemental proceeding with ca landlord	0.10
04/09/2023	PNM	Reviewing omnibus wage claim objection	0.10
04/09/2023	PNM	Review and analysis of [REDACTED] and preparing memo re same to client	0.30
04/09/2023	PNM	Correspondence from and to mediator re resumption of mediation	0.10
04/10/2023	KS	Finalize employee wage claim objections and review with attorney Paul Mascia	3.00
04/10/2023	MN	Call with client regarding [REDACTED]	0.30
04/10/2023	MN	Call with client and co-counsel [REDACTED]	1.00
04/10/2023	KS	Draft proposed order with schedule of claim objections/treatment for attachment to employee claims objections and review of same with attorney Paul Mascia	1.00
04/10/2023	PNM	Further preparation of omnibus wage claim objection	0.90
04/10/2023	PNM	Reviewing order sustaining first omnibus objection to consumer claims	0.10
04/10/2023	PNM	Telephone conference with client re [REDACTED]	0.80
04/10/2023	PNM	Correspondence from and to client re claims register	0.10
04/11/2023	KC	Receipt and review of Notice of Mediation; and calendar.	0.10
04/11/2023	PNM	Reviewing Leidich proof of claim and correspondence to client re same	0.10
04/11/2023	PNM	Reviewing forresters mediation notice	0.10
04/11/2023	PNM	Reviewing ninth and tenth omnibus objections to consumer claims	0.10
04/13/2023	PNM	Correspondence from client re omnibus wage claim objection	0.10
04/13/2023	PNM	Reviewing eleventh omnibus objection to consumer claims	0.10
04/14/2023	KS	Collate claimant emails and give filing instructions to paralegal re employee objection	0.40
04/14/2023	KC	Phone call with attorney Keenan Smith re: objection to employee claims and service list.	0.10
04/14/2023	KC	Proofread Assignee's First Omnibus Objection to Disputed Wage Claims; electronically file; review claims for claimant's email addresses; and serve via email to all claimants.	0.70

04/14/2023	KC	Confer with attorney re: negative notice of omnibus claim.	0.10
04/14/2023	PNM	Reviewing service of omnibus objection to claimants with bad email addresses and instructions to staff re scheduling hearing on omnibus objection to wage claims	0.20
04/14/2023	PNM	Correspondence from co-counsel re [REDACTED] and preparing memo to co-counsel re same	0.20
04/17/2023	MRS	Review emails regarding [REDACTED]	0.10
04/17/2023	KC	Prepare Amended Certificate of Service of Assignee's First Omnibus Objection To Disputed Wage Claims	0.30
04/17/2023	MN	Call with client and co-counsel regarding [REDACTED]	0.50
04/17/2023	PNM	Correspondence from and to claimant hill	0.10
04/17/2023	PNM	Correspondence from and to claimant kelly	0.10
04/17/2023	PNM	Reviewing order sustaining objection to kanter claim	0.10
04/17/2023	PNM	Reviewing order cancelling case management conference	0.10
04/17/2023	PNM	Reviewing order sustaining second omnibus objection to consumer claims	0.10
04/17/2023	PNM	Reviewing twelfth, thirteenth and fourteenth omnibus objections to consumer claims	0.10
04/17/2023	PNM	Telephone conference with client re [REDACTED] [REDACTED] [REDACTED]	0.50
04/17/2023	PNM	Correspondence from d&o counsel re [REDACTED] [REDACTED]	0.10
04/17/2023	PNM	Correspondence from and to co-counsel re [REDACTED] [REDACTED]	0.10
04/17/2023	PNM	Preparing amended certificate of service for omnibus claim objection	0.10
04/18/2023	KC	Revise Amended Certificate of Service; electronically file; serve via email; and provide instructions to staff for mailing.	0.30
04/18/2023	KC	Draft proposed order sustaining Objection to Claim of Evelyn Fernandez.	0.50
04/18/2023	KC	Review judge's procedures; prepare cover letter to judge; and submit proposed order sustaining objection to Evelyn Fernandez's claim.	0.30
04/18/2023	KC	Receipt and review of Order Cancelling Interim Case Management Conference scheduled for April 24; and update calendar.	0.10
04/18/2023	PNM	Correspondence from and to muhlberger re payment on wage claim	0.10
04/18/2023	PNM	Telephone call from claimant smith re wage claim objection	0.10
04/18/2023	PNM	Correspondence from client re [REDACTED] [REDACTED]	0.10

04/18/2023	PNM	Preparing order sustaining objection of evelyn fernandez and reviewing related statutes re same	0.40
04/18/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
04/18/2023	PNM	Correspondence from and to claimant mulberger	0.10
04/18/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
04/18/2023	PNM	Reviewing order sustaining objection fernandez claim	0.10
04/18/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
04/19/2023	KC	Check docket for Independent Order of Foresters case and retrieve Order Setting Interim Case Management Conferences.	0.10
04/19/2023	KC	Review judge's procedures for Zoom hearings; and calendar Case Management Conference in Forester case.	0.10
04/19/2023	KS	Review remitted employment agreement of Terry Smith and draft memo for attorney Mascia re claim	0.60
04/20/2023	MN	Zoom call with claimant Oak View Group [REDACTED] and follow up emails with co-counsel and client re same	1.00
04/20/2023	PNM	Review and analysis of employment agreement and related correspondence re objection to smith wage claim	0.20
04/20/2023	PNM	Reviewing correspondence from and to ca counsel re [REDACTED]	0.10
04/21/2023	PNM	Telephone conference with co-counsel re [REDACTED]	0.10
04/21/2023	PNM	Reviewing case management order for forresters matter in preparation of case management conference	0.10
04/21/2023	PNM	Correspondence from and to client re service of omnibus objection to wage claims	0.10
04/21/2023	PNM	Correspondence from and to forresters counsel re case management hearing	0.10
04/21/2023	PNM	Correspondence from and to client	0.10
04/24/2023	PNM	Correspondence from and to mediator re resorts world matter	0.10
04/25/2023	MRS	Additional search of [REDACTED] to resorts world in preparation of continued mediation and related mediation statement	2.70
04/25/2023	MRS	Additional search of [REDACTED] in preparation of continued mediation and related mediation statement	3.20
04/25/2023	MRS	Review need for additional document research in preparation of continued mediation and related mediation statement	0.30
04/25/2023	PNM	Reviewing discovery re resorts world matter in preparation of continued	0.40

		mediation	
04/25/2023	PNM	Reviewing fifteenth and sixteenth omnibus objections to consumer claims	0.10
04/26/2023	MN	Review CMC regarding Foresters	0.10
04/26/2023	PNM	Attending case management conference for forresters matter and preparing memo to file re same	1.20
04/27/2023	KS	Review claim of Terry Smith and potential objections	0.20
04/27/2023	MRS	Review ██████████ in preparation of continued mediation and related mediation statement	2.90
04/27/2023	MRS	Review ██████████ in preparation of continued mediation and related mediation statement	2.70
04/27/2023	PNM	Reviewing matter with mediator re status of continued mediation	0.10
04/27/2023	PNM	Correspondence to belgium counsel re matter status	0.10
04/27/2023	PNM	Reviewing smith objection, employment agreement and related documentation	0.30
04/27/2023	PNM	Reviewing documents ██████████ and initial preparation of memo in support of assignee position	1.20
04/27/2023	PNM	Telephone conference with client re ██████████	0.20
04/27/2023	PNM	Correspondence from and to client re ██████████	0.10
04/27/2023	PNM	Telephone conference with client re ██████████	0.70
04/27/2023	PNM	Correspondence to claimant smith re documentation to support wage claim	0.10
04/27/2023	PNM	Telephone conferences with claimant smith re settlement of claim objection	0.40
04/27/2023	PNM	Preparing memo to client re ██████████	0.20
04/27/2023	PNM	Instructions to attorney smith re order for terry smith claim	0.20
04/27/2023	PNM	Instructions to staff re order sustaining omnibus wage claims	0.10
04/27/2023	PNM	Reviewing matter re status of alevy claim and next steps re same	0.20
04/27/2023	PNM	Correspondence to claimant smith re settlement of claim objection	0.10
04/27/2023	PNM	Correspondence to client re ██████████	0.10
04/28/2023	KC	Draft proposed order sustaining omnibus objection to wage claims.	0.30
04/28/2023	KC	Draft Certificate of Service of Order Sustaining Objection Evelyn Fernandez Claim.	0.20
04/28/2023	KC	Electronically file Certificate of Service of Order Sustaining Objection Evelyn Fernandez Claim; serve via email; and instructions to staff for mailing.	0.20

04/28/2023	PNM	Preparing certificate of service for order sustaining objection to fernandez claim	0.10
04/28/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
04/29/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
Quantity Subtotal			43.9
Services Subtotal			\$14,187.50

Expenses

Date	Description	Quantity	Rate	Total
04/14/2023	E108 Postage: International Postage: Assignee's 1st Omnibus Objection to Disputed Wage Claims & Order Granting Assignee's 2nd Omnibus Objection to Claims.	2.00	\$2.98	\$5.96
04/14/2023	E108 Postage: Assignee's 1st Omnibus Objection to Disputed Wage Claims & Order Granting Assignee's 2nd Omnibus Objection to Claims.	3.00	\$0.84	\$2.52
04/14/2023	E108 Postage: Service for mailing Assignee's First Omnibus Objection to Disputed Wage Claims to Craig, Ziskind, and Donovan.	3.00	\$0.84	\$2.52
04/14/2023	E108 Postage: Service for mailing Assignee's First Omnibus Objection to Disputed Wage Claims to Meyer in Canada and Bozsik in Serbia.	2.00	\$2.98	\$5.96
04/18/2023	E108 Postage: Amended Certificate of Service Certificate of Service	5.00	\$0.84	\$4.20
04/24/2023	Nextpoint invoice #22582 Data storage through 3/31/23	1.00	\$2,611.69	\$2,611.69
04/28/2023	E108 Postage: Service of Certificate of Service to Evelyn Fernandez.	1.00	\$0.60	\$0.60
04/28/2023	E108 Postage: Service for mailing COS Order Sustaining in Part Assignee's Objection to Claim of Evelyn Fernandez to Evelyn Fernandez.	1.00	\$0.60	\$0.60
Expenses Subtotal			\$2,634.05	

Time Keeper	Quantity	Rate	Total
Paul Mascia	14.4	\$425.00	\$6,120.00
Michael A. Nardella	3.9	\$450.00	\$1,755.00
Matthew Silbernagel	11.9	\$250.00	\$2,975.00
Karen Cooper	3.5	\$225.00	\$787.50

Keenan Smith	10.2	\$250.00	\$2,550.00
		Quantity Total	43.9
		Subtotal	\$16,821.55
		Total	\$16,821.55

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11778	02/01/2023	\$16,602.50	\$0.00	\$16,602.50
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55
			Outstanding Balance	\$84,816.57
			Total Amount Outstanding	\$84,816.57

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03

10/03/2022	Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50	\$12,515.53
10/03/2022	Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53	\$6,780.00
10/03/2022	Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00	\$0.00
02/13/2023	Incoming Wire	3101-00003/Healy-Adv. Crystal Cruises, LLC		\$48,432.84
02/14/2023	Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26	\$37,097.58
02/14/2023	Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78	\$32,760.80
02/14/2023	Payment for invoice #11200	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50	\$16,222.30
02/14/2023	Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80	\$4,777.50
02/14/2023	Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50	\$0.00
IOLTA Trust Account Balance				\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12378
Date: 05/04/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.



INVOICE

Invoice # 12682
Date: 06/20/2023

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
05/01/2023	MN	Call with client regarding [REDACTED]	0.40
05/01/2023	MN	Call with client and team regarding [REDACTED]	0.80
05/01/2023	PNM	Reviewing seventeenth and eighteenth omnibus objections to consumer claims	0.10
05/01/2023	PNM	Telephone conference with client [REDACTED] and related matters	0.70
05/02/2023	PNM	Reviewing nineteenth omnibus objection to claims	0.10
05/02/2023	PNM	Reviewing motion to approve settlement with dutch trustee	0.10
05/03/2023	KS	Review agreement with Terry Smith re proposed order, review claims and treatment in objection and draft proposed order sustaining in part objection to claim of Terry Smith	2.00
05/03/2023	KS	Conduct review of procedures for proposed orders in assignment cases and finalize proposed order pursuant to procedures	0.80
05/03/2023	PNM	Reviewing docket for status of service of complaint in wilshire matter	0.10
05/03/2023	PNM	Correspondence from and to special counsel re [REDACTED]	0.10

05/03/2023	PNM	Correspondence to client re [REDACTED]	0.10
05/03/2023	PNM	Correspondence from and to belgium counsel re [REDACTED]	0.10
05/03/2023	PNM	Correspondence to client re [REDACTED]	0.10
05/03/2023	PNM	Reviewing matter re order sustaining in part objection to wage claim of smith	0.10
05/04/2023	PNM	Review and analysis of outstanding matters including resorts world litigation, ca landlord litigation, claims objections and related matters and required next steps for same	0.40
05/04/2023	PNM	Reviewing status of wage claim objections nad preparing agreed order on objection to smith claim	0.90
05/05/2023	PNM	Correspondence from and to claimant smith re agreed order	0.10
05/05/2023	PNM	Correspondence from and to client re status of [REDACTED]	0.10
05/05/2023	PNM	Correspondence from and to client re alevy claim	0.10
05/07/2023	MN	Emails regarding extension for landlord in supplemental proceeding	0.10
05/08/2023	KS	Call with Jack Pitcher re employee claim objections	0.10
05/08/2023	MN	Call with client and team regarding [REDACTED]	0.60
05/08/2023	MRS	Review [REDACTED] r [REDACTED] note certain emails with additional information	3.10
05/08/2023	PNM	Reviewing additional documents provided by client re resorts world matter	0.40
05/08/2023	PNM	Correspondence from client re additional wage claim objections	0.10
05/08/2023	PNM	Reviewing alevy claim and related correspondence	0.20
05/08/2023	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.40
05/09/2023	PNM	Correspondence from and to client re [REDACTED] [REDACTED]	0.20
05/09/2023	PNM	Correspondence from and to claimaint spears	0.10
05/09/2023	PNM	Preparing order sustaining omnibus wage claim objections	0.80
05/10/2023	KC	Prepare cover letter and submit proposed ominbus order via CourtMap.	0.30
05/10/2023	PNM	Reviewing order allowing assignee to destroy certain assignor records	0.10
05/10/2023	PNM	Correspondence from and to belgium counsel re [REDACTED]	0.10
05/10/2023	PNM	Reviewing order sustaining objection to omnibus wage claims and instructions to staff re service of same	0.10
05/11/2023	KC	Receipt and review of Order Sustaining in Part First Omnibus Objection to Wage Claims; and prepare certificate of service of same.	0.20
05/11/2023	KC	Electronically file Certificate of Service of Omnibus order; serve to claimants via	0.30

		email; and instructions to staff for mailing.	
05/11/2023	MRS	Case law research on [REDACTED] Read and review the following: FMS Mgmt. Sys. v. Rodriguez (In re Ranch House Motor Inn Int'l, Inc.), 335 B.R. 894, 898 (Bankr. M.D. Fla. 2006); Tim Hortons USA, Inc. v. Singh, No. 16-23041-CIV, 2017 U.S. Dist. LEXIS 176719, at *29-31 (S.D. Fla. Oct. 25, 2017); Indian Harbor Citrus v. Poppell, 658 So. 2d 605, 606 (Fla. 4th DCA 1995); Rybovich Boat Works, Inc. v. Atkins, 587 So. 2d 519, 521-22 (Fla. 4th DCA 1991); Okeechobee Resorts, L.L.C. v. E Z Cash Pawn, Inc., 145 So. 3d 989, 991 (Fla. 4th DCA 2014)	2.40
05/11/2023	MRS	Case law research on [REDACTED] read and review the follows: Perera v. Diolife Ltd. Liab. Co., 274 So. 3d 1119, 1120 (Fla. 4th DCA 2019); Prof'l Ins. Corp. v. Cahill, 90 So. 2d 916, 917 (Fla. 1956); Flagship Nat'l Bank v. Gray Distribution Sys., 485 So. 2d 1336, 1340 (Fla. 3d DCA 1986); Linear Corp. v. Standard Hardware Co., 423 So. 2d 966, 968 (Fla. 1st DCA 1982); Advanced Mktg. Sys. Corp. v. Zk Yacht Sales, 830 So. 2d 924, 927 (Fla. 4th DCA 2002); McDermott, Inc. v. Clyde Iron, 979 F.2d 1068, 1074-75 (5th Cir. 1992); Inspirations Nev. LLC v. Med Pro Billing, Inc., No. 20-CV-60268-STRAUSS, 2021 U.S. Dist. LEXIS 190318, at *10-11 (S.D. Fla. Oct. 2, 2021)	3.30
05/11/2023	MRS	Case law research on [REDACTED] read and review: All Seasons Condo. Ass'n v. Patrician Hotel, LLC, 274 So. 3d 438, 441 (Fla. 3d DCA 2019) and Fi-Evergreen Woods, LLC v. Estate of Robinson, 172 So. 3d 493, 495 (Fla. 5th DCA 2015)	0.80
05/11/2023	MRS	Initial draft of letter summarizing research on [REDACTED]	1.40
05/11/2023	PNM	Correpondence from and to belgium counsel re [REDACTED]	0.10
05/11/2023	PNM	Reviewing client production re resorts world correspondence and instructions to attorney silbernagel re premediation statement	0.40
05/11/2023	PNM	Telephone conference with client re [REDACTED]	0.10
05/11/2023	PNM	Reviewing certificate of service for order sustaining omnibus objection to wage claims and instructions to staff re revisions to same	0.10
05/11/2023	PNM	Reviewing matter re order on terry smith wage claim and instructions to staff re same	0.10
05/11/2023	PNM	Telephone call from mediator re resorts world mediation	0.10
05/11/2023	PNM	Correspondence to mediator re resorts world mediation	0.10
05/12/2023	MRS	Continued research on [REDACTED] Read and review Jackson Hewitt, Inc. v. Kaman, 100 So. 3d 19, 22 (Fla. 2d DCA 2011); Fla. State Oriental Med. Ass'n v. Slepín, 971 So. 2d 141, 142 (Fla. 1st DCA 2007).	1.40
05/12/2023	MRS	Complete draft of legal analysis of law on [REDACTED]	2.10
05/12/2023	MRS	Draft legal analysis of [REDACTED] draft application of law to Crystal's facts; draft conclusion; revise letter	2.80
05/12/2023	KC	Prepare cover letter to judge; and submit proposed agreed order sustaining	0.30

Objection to Terry Smith's Claim via CourtMap.			
05/12/2023	PNM	Reviweing response of kochen to omnibus, related timing and preparing memo to client re same	0.50
05/15/2023	KS	Conduct brief research re [REDACTED] and memo to attorney Paul Mascia	0.40
05/15/2023	KS	Correspondence with Jack Pitcher re claim of Suzanne Kochen including summary of correspondence from her counsel and instructions	0.20
05/15/2023	KS	Correspondence with Jack Pitcher re claim of Suzanne Kochen	0.10
05/16/2023	MRS	Review and Strategize about Memorandum on [REDACTED]	0.90
05/16/2023	MRS	Review negotiation emails; Redraft Memorandum on [REDACTED] as it pertains to initial facts to include additional negotiations emails and reporting standards [REDACTED]	1.90
05/16/2023	MRS	Review and research additional case law regarding [REDACTED]	0.70
05/16/2023	MRS	Review and Redraft Memorandum application of [REDACTED]	1.80
05/16/2023	MRS	Begin drafting mediation statement	0.80
05/16/2023	PNM	Reviewing matter re objection to kochen claim	0.20
05/16/2023	PNM	Reviewing cases re [REDACTED] and related preparation of premediation statement	0.80
05/16/2023	PNM	Review and analysis of documents provided with kochen wage claim and preparation of memo to client re same	0.80
05/16/2023	PNM	Correspondence to kochen re status of review of response to claim objection	0.10
05/16/2023	PNM	Telephone call to fact witness re alvey claim	0.10
05/16/2023	PNM	Correspondence from claimant novak	0.10
05/16/2023	PNM	Correspondence from from and to client re [REDACTED]	0.10
05/17/2023	MRS	Complete draft of mediation statement/letter to opposing regarding oral nad course of dealing modifications; revise factual background; revise legal argument.	3.90
05/17/2023	PNM	Correspondence from and to client re [REDACTED]	0.10
05/17/2023	PNM	Correpondence from and to co-counsel re [REDACTED]	0.10
05/17/2023	PNM	Correspondence to special counsel re [REDACTED]	0.10
05/17/2023	PNM	Reviewing client corrspondence re [REDACTED]	0.20
05/18/2023	KC	Receipt and review of signed Order Sustaining Claim of Terry Smith; and prepare Certificate of Service of same.	0.20

05/18/2023	PNM	Reviewing shapovalov proof of claim and related documents in support	0.10
05/18/2023	PNM	Reviewing certificate of service for order sustaining smith objection	0.10
05/19/2023	JQ	Electronically file Certificate of Service; and prepare service email.	0.50
05/19/2023	KC	Prepare Amended Certificate of Service of Terry Smith Order.	0.10
05/19/2023	JQ	Electronically file Amended Certificate of Service; and prepare service email.	0.50
05/19/2023	PNM	Correspondence from claimant reddish	0.10
05/19/2023	PNM	Reviewing filed, claim, smith agreed order and service of order filings from clerk of court	0.10
05/19/2023	PNM	Correspondence from client re [REDACTED]	0.10
05/22/2023	MN	Review potential claim objection in light of Dutch judgment	0.30
05/22/2023	KS	Correspondence with Jack Pitcher and review of email chain from same	0.10
05/22/2023	MN	Call with client and co-counsel regarding [REDACTED]	0.60
05/22/2023	KS	Draft omnibus objections to employee claims	3.20
05/22/2023	PNM	Reviewing amended certificate of service for agreed order on smith wage claim	0.10
05/22/2023	PNM	Reviewing kochen claim and conflict of law issues	0.20
05/22/2023	PNM	Reviewing status of ca landlord proceeding and correspondence to special counsel re same	0.10
05/22/2023	PNM	Preparing premediation position letter to resorts world	2.90
05/22/2023	PNM	Preparing for and attending client conference on [REDACTED]	0.50
05/22/2023	PNM	Reviewing wilshire motion to dismiss	0.20
05/22/2023	PNM	Reviewing novak proof of claim	0.10
05/22/2023	PNM	Correspondence to client re novak claim	0.10
05/22/2023	PNM	Preparing memo to client re [REDACTED]	0.40
05/23/2023	MN	Call with Losey Bast Amron about document requests for mediation	0.70
05/23/2023	KS	Call with Jack Pitcher re second omnibus claim objection	0.50
05/23/2023	KS	Continue draft of second omnibus objection to wage claims	1.90
05/23/2023	KS	Correspondence with Paul Mascia re second omnibus wage objections with memo re objections and claims for attorney review by Mascia	0.20
05/23/2023	KS	Review modification of claim treatment of Ingrid Silva and correspondence with Paul Mascia re same	0.20

05/23/2023	PNM	Correspondence from and to client re silva claim	0.10
05/23/2023	PNM	Reviewing motion to approve forresters settlement	0.10
05/24/2023	MRS	Case law research on [REDACTED] [REDACTED] [REDACTED]	1.70
05/24/2023	MRS	Case law research both Florida and Delaware RE: [REDACTED] [REDACTED] [REDACTED]	1.60
05/24/2023	KS	Revise second omnibus wage claim objection to modify treatment of claim no. 2383	0.30
05/24/2023	KS	Correspondence with Paul Mascia re modification/revision of second omnibus objection to employee wage claims	0.10
05/24/2023	PNM	Telephone conference with client re [REDACTED]	0.60
05/24/2023	PNM	Correspondence from and to resorts world counsel	0.10
05/24/2023	PNM	Correspondence from and to ediscovery software provider	0.10
05/24/2023	PNM	Telephone call with co-counsel re [REDACTED]	0.10
05/25/2023	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.20
05/25/2023	PNM	Telephone conference with mediator re continued mediation	0.10
05/26/2023	KC	Draft Release of Lis Pendens.	0.30
05/26/2023	KC	Electronically file Release of Lis Pendens; and serve via email.	0.30
05/26/2023	PNM	Telephone calls to resorts world counsel re lis pendens	0.10
05/26/2023	PNM	Correspondence from and to resorts world counsel re lis pendens	0.10
05/26/2023	PNM	Telephone conference with resorts world counsel re potential settlement	0.40
05/26/2023	PNM	Telephone conference with client re proposed escrow arrangement	0.30
05/26/2023	PNM	Finalizing resorts world premediation statement	0.90
05/26/2023	PNM	Preparing settlement memorandum to resorts world	0.20
05/26/2023	PNM	Instructions to staff re preparation of release of lis pendens and reviewing same	0.10
05/26/2023	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
05/29/2023	PNM	Correspondence from and to client re [REDACTED] [REDACTED]	0.10
05/29/2023	PNM	Reviewing letter from fienberg re alvey claim	0.10
05/29/2023	PNM	Correspondence from and to resorts world counsel re release of lis pendens	0.10
05/29/2023	PNM	Review and analysis of co-counsel response in opposition to wilshire motion to	0.30

		dismiss and preparing memo re suggested revisions to same	
05/29/2023	PNM	Reviewing certificate of service for release of lis pendens and instructions to staff re revision to same	0.10
05/29/2023	PNM	Correspondence from and to mediator re status of resorts world continued mediation	0.10
05/30/2023	KC	Prepare service email of Notice of Release of Lis Pendens to Resorts World counsel.	0.10
05/30/2023	PNM	Correspondence from and to special counsel re [REDACTED]	0.10
05/30/2023	PNM	Correspondence form and to resorts world counsel re continued mediation	0.10
05/31/2023	MN	Review potential settlement with Resorts World	0.10
05/31/2023	PNM	Telephone conference with client re [REDACTED]	0.30
05/31/2023	PNM	Telephone call to resorts world counsel	0.10
05/31/2023	PNM	Preparing second omnibus objection to wage claims	0.60
05/31/2023	PNM	Telephone conference with client [REDACTED]	0.20
05/31/2023	PNM	Correspondence from and to resorts world counsel re settlement offer	0.10
05/31/2023	PNM	Telephone conferences with resorts world counsel re settlement	0.50
05/31/2023	PNM	Correspondence from client re [REDACTED]	0.10
05/31/2023	PNM	Preparing settlement term memorandum re resorts world settlement and correspondence to opposing counsle re same	0.40
05/31/2023	PNM	Telephone conferences with client re [REDACTED]	0.50
05/31/2023	PNM	Reviewing twentieth omnibus objection to consumer claims	0.10
05/31/2023	PNM	Correspondence from and to pitts counsel re claim status	0.10
		Quantity Subtotal	70.0
		Services Subtotal	\$21,972.50

Expenses

Date	Description	Quantity	Rate	Total
05/11/2023	E108 Postage: Service for Mailing Certificate for Service and Order Sustaining in Part Assignee's First Omnibus Objection to Disputed Wage Claims to corresponding party in Serbia.	1.00	\$2.71	\$2.71
05/11/2023	E108 Postage: Service for Mailing Certificate for Service and Order Sustaining in Part Assignee's First Omnibus Objection to Disputed Wage Claims to corresponding party in Canada.	1.00	\$1.45	\$1.45

05/11/2023	E108 Postage: Service for Mailing Certificate for Service and Order Sustaining in Part Assignee's First Omnibus Objection to Disputed Wage Claims to corresponding parties in Florida.	3.00	\$0.84	\$2.52
05/24/2023	Nextpoint invoice #22583 Data storage through 4/30/23	1.00	\$300.00	\$300.00
05/26/2023	Miami Dade clerk - Release of Lis Pendens recording fee (FL E-filing Portal.)	1.00	\$14.00	\$14.00
Expenses Subtotal			\$320.68	

Time Keeper	Quantity	Rate	Total
Paul Mascia	22.6	\$425.00	\$9,605.00
Michael A. Nardella	3.6	\$450.00	\$1,620.00
Matthew Silbernagel	30.6	\$250.00	\$7,650.00
Karen Cooper	2.1	\$225.00	\$472.50
JoAnn Quinn	1.0	\$100.00	\$100.00
Keenan Smith	10.1	\$250.00	\$2,525.00
Quantity Total			70.0
Subtotal			\$22,293.18
Total			\$22,293.18

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
11778	02/01/2023	\$16,602.50	\$0.00	\$16,602.50
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18

Outstanding Balance **\$84,816.57**
Total Amount Outstanding **\$84,816.57**

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00
02/13/2023	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$48,432.84	\$48,432.84
02/14/2023		Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26		\$37,097.58
02/14/2023		Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78		\$32,760.80
02/14/2023		Payment for invoice #11200	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50		\$16,222.30
02/14/2023		Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80		\$4,777.50
02/14/2023		Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50		\$0.00

IOLTA Trust Account Balance

\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12682
Date: 06/20/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.



INVOICE

Invoice # 12683
Date: 02/01/2023

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Date	Time Keeper	Description	Quantity
01/03/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
01/03/2023	PNM	Initial preparation of case management report for resorts world litigation	0.20
01/03/2023	PNM	Initial review and analysis of resort world miami motion to dismiss	0.20
01/03/2023	PNM	Correspondence to client re [REDACTED]	0.10
01/05/2023	KC	Draft Joint Case Management Report.	0.20
01/05/2023	PNM	Telephone conference with counsel for claimant viking life saving equipment	0.10
01/06/2023	KC	Continue drafting Joint Case Management Report.	0.60
01/06/2023	PNM	Reviewing matter re response in opposition to motion to dismiss	0.20
01/06/2023	PNM	Correspondence to opposing counsel re response to motion to dismiss	0.10
01/06/2023	PNM	Initial preparation of motion to enlarge time to respond to motion to dismiss and instructions to paralegal re same	0.20
01/07/2023	PNM	Correspondence from and to claimant falcon	0.10
01/07/2023	PNM	Correspondence from and to resorts world miami counsel re matter staus and coordination of related next steps	0.10
01/09/2023	KC	Review business court rules as to extension to file opposition procedure.	0.20

01/09/2023	MN	Review venue argument by Resorts World	0.30
01/09/2023	MN	Call with client and co-counsel regarding ██████████	1.00
01/09/2023	KC	Electronically file Stipulation Extending Time to File Response to Motion to Dismiss.	0.10
01/09/2023	PNM	Reviewing tolling agreement in d&o case	0.20
01/09/2023	PNM	Reviewing revised confidentiality agreement in d&o case	0.10
01/09/2023	PNM	Telephone conference with client re ██████████ ██████████	0.20
01/09/2023	PNM	Telephone conference with client re ██████████ ██████████	0.10
01/09/2023	PNM	Correspondence from and to d&o counsel re ██████████ ██████████	0.10
01/09/2023	PNM	Reviewing stipulation re extension of time to respond to motion to dismiss	0.10
01/09/2023	PNM	Correspondence to resorts world counsel re stipulation on response to motion to dismiss	0.10
01/09/2023	PNM	Reviewing matter re proposed case management plan	0.10
01/09/2023	PNM	Telephone conference with client re ██████████ ██████████ ██████████	0.60
01/10/2023	KC	Draft fee application for Nardella & Nardella re: August through December 2022 invoices; compile, calculate, review and redact invoices.	1.30
01/10/2023	KC	Further draft Astrea's fee application with additional invoices; further draft proposed order; updated exhibit; and research how to add euros.	0.60
01/10/2023	KC	Draft proposed order approving stipulation; prepare cover letter to judge; and submit via CourtMap.	0.30
01/10/2023	PNM	Correspondence from to special counsel losey re ██████████ ██████████	0.20
01/10/2023	PNM	Preparing interim fee application for belguim counsel	0.30
01/10/2023	PNM	Reseach re corporate ownership of resorts world miami ██████████ ██████████ in preparation of response to motion to dismiss	0.70
01/10/2023	PNM	Correspondence from and to opposing counsel and clients re depositions	0.10
01/10/2023	PNM	Correspondence to client re media inquiry	0.10
01/10/2023	PNM	Correspondence to co-counsel re ██████████	0.10
01/11/2023	PNM	Telephone conference with client re ██████████ ██████████	0.10
01/11/2023	PNM	Preparing memorandum to client re ██████████ ██████████	0.20

01/11/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
01/11/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
01/11/2023	PNM	Telephone confrence with client re [REDACTED] [REDACTED] resorts world miami litigation	0.30
01/12/2023	MRS	T.C. w/ co-counsel regarding additional [REDACTED] [REDACTED]	0.60
01/12/2023	KC	Receipt and review signed Order Approving Stipulation for Extension of Time; and update calendar.	0.10
01/12/2023	MRS	Research case law pertaining to [REDACTED]	0.40
01/12/2023	MRS	Draft updated memorandum [REDACTED]	0.90
01/12/2023	MRS	Review discovery documents from Bast Armon [REDACTED] [REDACTED] [REDACTED]	2.60
01/12/2023	MRS	Review discovery documents from Bast Armon [REDACTED] [REDACTED]	1.20
01/12/2023	MRS	Review discovery documents from Bast Armon (RW00803-RW00995) [REDACTED] [REDACTED] [REDACTED]	2.10
01/12/2023	PNM	Reviewing matter re additional research necessary to address [REDACTED] [REDACTED] [REDACTED]	0.40
01/12/2023	PNM	Further review of assignor documents [REDACTED] [REDACTED]	0.50
01/12/2023	PNM	Telephone conference with d&o counsel re [REDACTED] [REDACTED]	0.50
01/12/2023	PNM	Telephone conference with client re [REDACTED] [REDACTED]	0.10
01/12/2023	PNM	Reviewing motion for approval of pbgc settlement	0.10
01/12/2023	PNM	Review and analysis of cases and statues re [REDACTED] [REDACTED] [REDACTED]	1.40
01/12/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
01/12/2023	MRS	Research [REDACTED] research [REDACTED]	0.90
01/12/2023	MRS	Organize research and strategize about [REDACTED] [REDACTED]	0.80
01/12/2023	MRS	Additional research pertaining to [REDACTED] [REDACTED]	0.70

01/12/2023	MRS	State law research regarding [REDACTED]	0.60
01/12/2023	MRS	Review communication regarding [REDACTED] [REDACTED]	0.30
01/12/2023	MRS	Draft memorandum on [REDACTED]	1.30
01/12/2023	MRS	Review pleadings and discovery summarization to date to identify [REDACTED]	0.70
01/12/2023	MRS	Initial organization of proffered discovery and identification of [REDACTED] [REDACTED]	0.90
01/12/2023	MRS	Organize additional research and prep for T.C. w/ co-counsel	0.20
01/12/2023	MRS	Review Armon's discovery documents for [REDACTED] [REDACTED]	0.80
01/13/2023	KC	Finalize Nardella and Belgium counsel's Motion for Fee Approval; combine exhibits; electronically file; and serve via email.	0.50
01/13/2023	MRS	Review initial communications produced regarding potential lease with RWM	0.30
01/13/2023	MRS	Review early communication from June, 2018 regarding [REDACTED] [REDACTED]	0.80
01/13/2023	MRS	Review and confirm communications proffered regarding [REDACTED]	0.60
01/13/2023	MRS	REview and confirm [REDACTED] as well as [REDACTED]	0.90
01/13/2023	MRS	Review proffered cancelation communications pertaining to [REDACTED]	0.70
01/13/2023	MRS	REview [REDACTED]	0.20
01/13/2023	MRS	Review and organize [REDACTED]	0.80
01/13/2023	MRS	Review early draft of PSA	0.20
01/13/2023	MRS	Revise and send memorandum regarding removal to federal court and jurisdictional challenges.	0.40
01/13/2023	MRS	Organize research file; strategize about approach on call with client and co-counsel regarding [REDACTED]	0.80
01/13/2023	PNM	Preparing belgium counsel motion for approval of interim fees	0.40
01/13/2023	PNM	Preparing proposed order granting belgium counsel interim fee application	0.10
01/13/2023	PNM	Review and analysis of documents produced by d&o counsel and preparing memo to file re same	0.80
01/13/2023	PNM	Review and analysis of client correspondence with [REDACTED] [REDACTED] and preparing memo re same	0.70
01/13/2023	PNM	Reviewing and analysis of client correspondence with [REDACTED] [REDACTED] and preparing memo to file re same	0.70

01/16/2023	MN	Review [REDACTED] lawsuit with Resorts World	0.10
01/16/2023	MN	Call regarding [REDACTED]	0.10
01/16/2023	MN	Call with client regarding [REDACTED]	1.00
01/16/2023	MRS	Draft proposed Agreed Order on MTD and research [REDACTED]	0.80
01/16/2023	MRS	Review and prepare notes for issues from [REDACTED]	0.40
01/16/2023	PNM	Correspondence from client re [REDACTED]	0.10
01/16/2023	PNM	Correspondence to client re [REDACTED]	0.10
01/16/2023	PNM	Reviewing matter re proposal for agreed order on motion to dismiss by resorts world miami and related dismissal without prejudice for filing in federal court	0.20
01/16/2023	PNM	Correspondence from and to d&o counsel [REDACTED]	0.10
01/16/2023	PNM	Correspondence from opposing counsel re [REDACTED]	0.10
01/16/2023	PNM	Reviewing certificates of service for belgium and nardella motions for interim compensation	0.10
01/16/2023	PNM	Telephone call to opposing counsel re agreed order on motion to dismiss	0.10
01/16/2023	PNM	Instructions to attorney silbernagel re agreed order motion to dismiss	0.10
01/16/2023	PNM	Correspondence from belguim counsel re invoice for time after recent application and reviewing same	0.10
01/16/2023	PNM	Correspondence to belguim counsel re interim motion for compensation and matter status	0.10
01/16/2023	PNM	Correspondence to d&o counsel re [REDACTED]	0.10
01/16/2023	PNM	Preparing order granting motion to dismiss and voluntary dismissal	0.20
01/16/2023	PNM	Correspondence to opposing counsel re proposed agreed order and settlement discussion	0.20
01/16/2023	PNM	Telephone conference with client re [REDACTED]	0.90
01/17/2023	KC	Prepare cover letter to judge; submit proposed agreed order on motion to dismiss via CourtMap; and email copy to opposing counsel.	0.30
01/17/2023	KC	Receipt and review of signed order of dismissal; and update calendar.	0.10
01/17/2023	PNM	Correspondence from and to resorts world counsel re agreed order on motion to dismiss	0.10
01/17/2023	PNM	Instructions to staff re entry of agreed order on motion to dismiss	0.10

01/17/2023	PNM	Reviewing executed order dismissing case without prejudice to file in federal court	0.10
01/17/2023	PNM	Corrspondence to client re [REDACTED]	0.10
01/18/2023	KC	Receipt and review of Notice of Hearing on fee apps; and calendar.	0.10
01/18/2023	PNM	Reviewing matter re hearing on motions for interim fee applications	0.10
01/18/2023	PNM	Reviewing matter re certificates of service for interim fee applications and instructions to staff re same	0.10
01/18/2023	PNM	Correpondence from and to co-counsel re [REDACTED]	0.10
01/20/2023	PNM	Telephone conference with resorts world counsel re presuit mediation	0.30
01/20/2023	PNM	Telephone call with client [REDACTED]	0.10
01/20/2023	PNM	Correpondence from and to client re [REDACTED]	0.10
01/20/2023	PNM	Reviewing order canceling interim case management conference for resorts world	0.10
01/20/2023	PNM	Correspondence from and to d&o [REDACTED]	0.10
01/23/2023	KC	Receipt and review of Interim Case Management Conference; and update calendar.	0.10
01/23/2023	KC	Draft Notice of Lis Pendens.	0.50
01/23/2023	MN	Call with client and co-counsel regarding [REDACTED]	0.60
01/23/2023	PNM	Telephone call from claimaint blanchette re claim status	0.10
01/23/2023	PNM	Corrspondence from and to commercial claimaint apex re late claim	0.10
01/23/2023	PNM	Telephone conference with client re [REDACTED]	0.10
01/23/2023	PNM	Telephone call to resorts world re presuit mediation	0.10
01/23/2023	PNM	Corrspondence to resorts world counsel re mediation	0.10
01/23/2023	PNM	Preparing outline for client conference [REDACTED]	0.10
01/24/2023	KC	Email correspondence to client providing copy of Complaint for mediator.	0.10
01/25/2023	MN	Review and propose edits to motion to set claims objection procedures	0.20
01/25/2023	MRS	Review email from co-counsel.	0.10
01/25/2023	PNM	Reviewing correspondence from and to client re [REDACTED]	0.10
01/25/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
01/25/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10

01/25/2023	PNM	Correspondence from and to resorts world miami counsel re presuit mediation	0.10
01/25/2023	PNM	Correspondence to mediator for resorts world mediation	0.10
01/25/2023	PNM	Correspondence from and to mediator re pre-mediation attorney conference conference	0.10
01/25/2023	PNM	Reviewing motion to approve claims procedures and related correspondence	0.20
01/26/2023	MN	Call with co-counsel Losey regarding [REDACTED]	0.40
01/26/2023	PNM	Correspondence from and to d&o counsel re [REDACTED]	0.10
01/27/2023	PNM	Reviewing correspondence from client [REDACTED]	0.10
01/27/2023	PNM	Reviewing [REDACTED] spreadsheet	0.10
01/27/2023	PNM	Reviewing [REDACTED] spreadsheet	0.10
01/27/2023	PNM	Reviewing insurance company deposition duces tecum notices	0.10
01/30/2023	KC	Receipt and review of Notices of Taking Depositions; and calendar.	0.20
01/30/2023	PNM	Correspondence to claimants Abercrombie and Kent re claim status	0.10
01/30/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
01/30/2023	PNM	Preparing for and attending telephone conference with client re [REDACTED]	0.40
Quantity Subtotal			48.5

Time Keeper	Quantity	Rate	Total
Paul Mascia	17.5	\$425.00	\$7,437.50
Michael A. Nardella	3.7	\$450.00	\$1,665.00
Matthew Silbernagel	22.0	\$250.00	\$5,500.00
Karen Cooper	5.3	\$225.00	\$1,192.50
Quantity Total			48.5
Subtotal			\$15,795.00
Total			\$15,795.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55
12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12683	02/01/2023	\$15,795.00	\$0.00	\$15,795.00
Outstanding Balance				\$84,009.07
Total Amount Outstanding				\$84,009.07

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00

02/13/2023	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC	\$48,432.84	\$48,432.84
02/14/2023		Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26	\$37,097.58
02/14/2023		Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78	\$32,760.80
02/14/2023		Payment for invoice #11200	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50	\$16,222.30
02/14/2023		Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80	\$4,777.50
02/14/2023		Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50	\$0.00
IOLTA Trust Account Balance				\$0.00	

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12683
Date: 02/01/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.



135 W. Central Blvd., Suite 300
Orlando, Florida 32801

Mark Healy
841 Prudential Drive
Jacksonville, FL 32207

INVOICE

Invoice # 12840
Date: 07/17/2023

3101-00003/Healy-Adv. Crystal Cruises, LLC

Adv. Crystal Cruises, LLC

Services

Date	Time Keeper	Description	Quantity
06/01/2023	MRS	Review settlement terms; review previous settlement agreements	0.90
06/01/2023	MRS	Draft whereas clauses for settlement agreement with RWM.	0.80
06/01/2023	MRS	Draft terms of settlement agreement for RWM	0.90
06/01/2023	MRS	Revise and edit Settlement Agreement with RWM	0.70
06/01/2023	PNM	Telephone conference with client re settlement agreement	0.20
06/01/2023	PNM	Correspondence from and to co-counsel re resorts world settlement agreement	0.10
06/01/2023	PNM	Initial preparation of settlement agreement for resorts world	0.20
06/01/2023	PNM	Correspondence from and to co-counsel re [REDACTED]	0.10
06/02/2023	MN	Emails regarding proof of claim	0.20
06/02/2023	KC	Search official records and retrieve recorded copy of Release of Lis Pendens.	0.20
06/02/2023	MN	Review potential objection to subtenant	0.10
06/02/2023	MN	Review settlement of [REDACTED] with Resort World	0.10
06/02/2023	MRS	Revise Settlement Agreement to include [REDACTED]	0.90

06/02/2023	MRS	Draft Motion for Settlement Approval	1.70
06/02/2023	MRS	Revise draft of of motion for approval of settlement agreement	0.70
06/02/2023	MRS	Draft order for approval of settlement agreement.	1.10
06/02/2023	PNM	Correspondence from and to d&o counsel re settlement of resorts world matter	0.10
06/02/2023	PNM	Correspondence from and to d&o counsel re premediation statement	0.10
06/02/2023	PNM	Reviewing matter re objection to claim of ovg	0.10
06/05/2023	MRS	Review and strategize about OVG claim	0.60
06/05/2023	MN	Review and respond to emails regarding demand for [REDACTED]	0.10
06/05/2023	MRS	Review California Code Section [REDACTED] review applicaiton in assignment cases; review [REDACTED]	2.40
06/05/2023	MRS	Research [REDACTED] and application in Florida assignment cases	0.90
06/05/2023	MN	Call with client and co-counsel regarding status including claims objections and procedures	0.90
06/05/2023	KS	Revise second omnibus objection to wage claims	0.80
06/05/2023	KS	Additional revisions to second omnibus wage objections	3.00
06/05/2023	KS	Correspondence with Jack Pitcher re Second Omnibus Objections with summary of claims and issues for review	0.30
06/05/2023	PNM	Review and analysis of ovg claim and related legal issues and instructions to attorney silbernagel re same	0.50
06/05/2023	PNM	Telephone conference with d&o counsel re upcoming mediation and resorts world settlement	0.40
06/05/2023	PNM	Reviewing matter re assignee demand in preparation of mediation	0.20
06/05/2023	PNM	Telephone conference with client re estate administration matters including [REDACTED]	0.80
06/06/2023	KS	Finalize second omnibus objections to employee wage claims	1.10
06/06/2023	KC	Electronically file Second Omnibus Objection; and serve to claimants via email.	0.30
06/06/2023	KS	Correspondence with Jack Pitcher	0.10
06/06/2023	KS	Instructions to paralegal re filing omnibus wage objections	0.10
06/06/2023	KS	Call with Jack Pitcher re omnibus employee wage claims	0.20
06/06/2023	MRS	Research case law regarding [REDACTED]	2.80
06/06/2023	MRS	Draft summary of OVG research	1.30

06/06/2023	MRS	Review [REDACTED] [REDACTED] [REDACTED] Research additional case law on [REDACTED]	2.70
06/06/2023	KS	Correspondence with Jack Pitcher	0.30
06/06/2023	PNM	Correspondence from client re second omnibus objection to wage claims	0.10
06/06/2023	PNM	Preparing second omnibus objection to wage claims	0.20
06/06/2023	PNM	Correspondence from and to resorts world counsel re directive to title company	0.10
06/07/2023	MRS	Review and strategize about additional research for OVG	0.30
06/07/2023	MRS	Research [REDACTED] under Cal. law and Cal. Code Sec, 1950.7; Read and review [REDACTED] [REDACTED] Read and review [REDACTED] [REDACTED]	2.90
06/07/2023	PNM	Correspondence from and to special counsel re wilshire reply and request for sur-reply	0.10
06/07/2023	PNM	Review and analysis of wilshire reply and related legal issues	0.30
06/07/2023	PNM	Reviewing research re response in opposition to ovg claims	0.30
06/07/2023	PNM	Reviewing twentifirst omnibus objection to consumer claims	0.10
06/07/2023	PNM	Correspondence from and to belgium re status of settlement negotiations	0.10
06/07/2023	PNM	Correspondence from and to d&o counsel re mediation	0.10
06/07/2023	PNM	Telephone conference with client re strategy for [REDACTED]	0.20
06/07/2023	PNM	Telephone call to alevy witness re claim	0.10
06/08/2023	MRS	Review 11 Cases for [REDACTED]	0.90
06/08/2023	MRS	Review 3 cases for [REDACTED]	0.80
06/08/2023	MRS	Review 29 Cases for: [REDACTED]	1.30
06/08/2023	MRS	Review 2 Cases for [REDACTED]	0.40
06/08/2023	MRS	Review and strategize about OVG claim	0.30
06/08/2023	PNM	Reviewing research re ovg claim and related objection and instructions to attorney silbernagel re same	0.30
06/08/2023	PNM	Correspondence from anderson counsel re claim objection	0.10
06/08/2023	PNM	Correspondence to client re anderson response to claim objectio and next steps	0.10
06/12/2023	MN	Review claim of subtenant under CA law and organize objection to same	0.40
06/12/2023	KS	Review of Suzanne Kochen employment agreement and comparison with	1.40

		claimed remuneration amount. Draft memo to attorney Paul Mascia re amounts owed under employment agreement	
06/12/2023	MRS	Review all 66 cases in California dealing with [REDACTED]	1.10
06/12/2023	KS	Continue review of Kochen employment agreement as well as Dutch judgment, and draft extensive memo detailing [REDACTED] and legal analysis of [REDACTED]	1.70
06/12/2023	PNM	Correspondence from and to d&o counsel re mediation	0.10
06/12/2023	PNM	Correspondence from and to ca counsel re [REDACTED]	0.20
06/12/2023	PNM	Correspondence from d&o counsel re mediation statements and related exhibits	0.10
06/12/2023	PNM	Reviewing ca statute, cases and related issues for ovg claim	0.40
06/12/2023	PNM	Preparing resorts world settlement agreement and related exhibits	1.10
06/12/2023	PNM	Telephone conference with client re [REDACTED]	0.10
06/12/2023	PNM	Reviewing Kochen employment agreement and related post-termination payment obligations	0.20
06/12/2023	PNM	Telephone conference with client re [REDACTED]	0.40
06/12/2023	PNM	Preparing motion to approve settlement for resorts world matter	0.70
06/12/2023	PNM	Reviewing response to kochen re wages claim	0.10
06/12/2023	PNM	Reviewing twenty-second omnibus consumer claim objection	0.10
06/12/2023	PNM	Reviewing matter re astrea application for payment and instructions to staff re same	0.10
06/13/2023	MRS	Pull cases from California addressing [REDACTED]	0.60
06/13/2023	MRS	Research mechanics of suit on 1950 7 under California law; summarize results [REDACTED]	2.20
06/13/2023	KS	Review issues related to claim amount of Suzanne Kochen under Dutch law/ judgment and employment agreement	0.70
06/13/2023	PNM	Reviewing and revising co-counsel revisions to settlement agreement	0.20
06/13/2023	PNM	Correspondence to resorts world counsel re settlement agreement	0.10
06/13/2023	PNM	Correspondence from and to anderson counsel re agreed order on wage claim	0.10
06/13/2023	PNM	Conference with client and d&o counsel re [REDACTED]	1.10
06/13/2023	PNM	Correspondence to and from resorts world counsel re settlement agreement with resorts world	0.10
06/13/2023	PNM	Analyzing and reviewing kochen claim, related defenses, applicability of [REDACTED] components of claim and instructions to attorney smith re same	0.80

06/13/2023	PNM	Further preparation of resorts world settlement agreement	0.30
06/14/2023	MRS	Review research and strategize about objection and accompanying memorandum of law to OVG claim	0.60
06/14/2023	KC	Draft Motion for Approval of Fees and Expenses Incurred by Astrea from June 2022 through June 2023; and proposed order on same.	0.80
06/14/2023	MRS	Additional case law reserach for OVG Claim objection	0.90
06/14/2023	MRS	Draft Memorandum of Law on OVG Claim	2.30
06/14/2023	MRS	Draft Objection to OVG Claim	2.60
06/14/2023	MRS	Edit Objection to OVG Claim	0.80
06/14/2023	KS	Correspondence with Jack Pitcher	0.10
06/14/2023	KS	Review proofs of claim for third omnibus employee objections in anticipation of call with Jack Pitcher and review correspondence re same from Mr. Pitcher	0.30
06/14/2023	PNM	Further review of research and cases regarding application of [REDACTED] and initial preparation of claim objection	0.60
06/14/2023	PNM	Telephone conference with client re [REDACTED]	0.30
06/14/2023	PNM	Correpondence from and to resorts world counsel re settlement agreement	0.10
06/14/2023	PNM	Instructions to attorney smith re third omnibus claim objection	0.10
06/15/2023	MN	Meeting with client regarding [REDACTED]	0.40
06/15/2023	MRS	Research segregation requirements for security case law	0.90
06/15/2023	MRS	Revise case law for Objection to OVG's claim	0.80
06/15/2023	MRS	Finalize both Objection to OVG and Memorandum of Law	0.90
06/15/2023	MRS	Summarize research and remaining issues for revisions in Objection	0.30
06/15/2023	PNM	Reviewing third omnibus objection to wage claims and related claims with client	0.40
06/15/2023	PNM	Correspondence from and to resorts world counsel re settlement agreement	0.10
06/15/2023	PNM	Revewing revisions to settlement agreement and revising same	0.30
06/15/2023	PNM	Telephone conferences with client and d&o counsel [REDACTED]	0.40
06/15/2023	PNM	Telephone conference with resorts world counsel re settlement agreement	0.10
06/16/2023	KS	Call with Jack Pitcher re [REDACTED]	1.00
06/16/2023	KS	Draft third omnibus objections to wage claims	2.60
06/16/2023	PNM	Correspondnece from and to resorts world counsel re settlement	0.10
06/16/2023	PNM	Telephone call with client re [REDACTED]	0.20

06/16/2023	PNM	Correspondence to d&o counsel re mediation strategy	0.10
06/16/2023	PNM	Correspondence from and to belgium counsel re matter status	0.10
06/16/2023	PNM	Reviewing matter re third omnibus claim objection	0.10
06/19/2023	KS	Finalize Third Omnibus Objection to Employee wage claims and correspondence with Jack Pitcher for review	2.20
06/19/2023	PNM	Reviewing ██ research re resorts world	0.40
06/19/2023	PNM	Correspondence from and to d&o counsel re mediation strategy	0.10
06/19/2023	PNM	Correspondence from and to belgium counsel re next steps in matter	0.10
06/19/2023	PNM	Travel to mediation on directors and officers matter	4.40
06/19/2023	PNM	Correspondence from and to d&o counsel re mediation	0.10
06/19/2023	PNM	Reviewing status of third omnibus claim objection and instructions to attorney smith re same	0.10
06/20/2023	KC	Further draft Motion for Approval of Fees and Expenses Incurred by Astrea to include additional invoice.	0.40
06/20/2023	KS	Draft negotiation letter to attorney for Suzanne Kochen	1.10
06/20/2023	PNM	Attendance at mediation on claim against directors and officers claims and insurers	11.60
06/20/2023	PNM	Correspondence from and to belgium counsel re settlement strategy	0.10
06/20/2023	PNM	Preparing astrea motion for fees and related proposed order	0.30
06/20/2023	PNM	Preparing application for professional fees and related redaction of multiple exhibits	1.40
06/21/2023	KS	Finalize third omnibus objections to employee wage claims and provide filing instructions to paralegal	0.70
06/21/2023	KC	Draft Motion for Approval of Fees and Expenses Incurred by Nardella & Nardella	0.90
06/21/2023	KC	Electronically file Second Omnibus Objection; and serve to claimants via email.	0.30
06/21/2023	KS	Finalize settlement communication letter to attorney for Kochen and correspondence with same	0.40
06/21/2023	PNM	Attendance at second day of mediation on claim against directors and officers claims and insurers	4.90
06/21/2023	PNM	Preparing settlement letter to Kochen counsel	0.30
06/21/2023	PNM	Travel from mediation in miami on directors and officers matter	4.40
06/21/2023	PNM	Correspondence from and to client re third omnibus objection to wage claims	0.10
06/21/2023	PNM	Reviewing order canceling case management conference	0.10

06/21/2023	PNM	Reviewing twenty-third omnibus consumer claim objection	0.10
06/22/2023	KS	Review employment agreements for International Cruise Services LTD contractors and ICSL/Crystal management agreement. Call with Jack Pitcher re same	1.60
06/22/2023	MN	Call with client regarding [REDACTED]	0.30
06/22/2023	PNM	Reviewing responses to third omnibus wage claim objection and nature of contractors as employees of third party entity	0.30
06/23/2023	KS	Call with Jack Pitcher re [REDACTED]	0.20
06/23/2023	KS	Correspondence with Jack Pitcher	0.10
06/23/2023	PNM	Telephone conferences with d&o counsel re settlement agreement and related releases	0.50
06/23/2023	PNM	Telephone conference with client re [REDACTED]	0.30
06/23/2023	PNM	Telephone conference with resorts world counsel re revisions to settlement agreement in light of canceled property sale	0.20
06/23/2023	PNM	Reviewing twenty-fourth omnibus objection to consumer claims	0.10
06/24/2023	PNM	Revising resorts world settlement agreement	0.90
06/26/2023	KC	Receipt and review of Order Cancelling Interim Case Management Conference; and update calendar.	0.10
06/26/2023	KS	Review responses of claimants to claim objection	0.20
06/26/2023	KC	Input claimant responses to objections to spreadsheet.	0.40
06/26/2023	KS	Correspondence with Jack Pitcher	0.10
06/26/2023	MN	Issues related to settlement with Resorts World	0.10
06/26/2023	MN	Review objection to subtenant claim	0.20
06/26/2023	MN	Call regarding updates on [REDACTED]	0.20
06/26/2023	KS	Prepare for and attend settlement call with Suzanne Kochen	1.20
06/26/2023	KC	Email correspondence to claimant Gabriel Gosman advising to follow the procedure.	0.10
06/26/2023	MN	Call with client regarding status including [REDACTED]	0.60
06/26/2023	PNM	Telephone conference with belgium counsel and client re [REDACTED]	0.50
06/26/2023	PNM	Reviewing estate administration matters including d&o settlement, resorts world settlement and ovg claim objection in preparation for client call	0.50
06/26/2023	PNM	Reviewing term sheet for d&o settlement	0.20

06/26/2023	PNM	Reviewing gosman response to claim objection and preparing reply to same	0.10
06/27/2023	KS	Call with Jack Pitcher	0.50
06/27/2023	KS	Review outstanding disputes of treatment of employee wage claims	0.40
06/27/2023	KS	Correspondence with non-claimant non-employee Cristian Mondaca	0.20
06/27/2023	KS	Correspondence with respondent to claim objections, Sarah Hayes	0.20
06/27/2023	KS	Review correspondence from Suzanne Kochen	0.10
06/27/2023	KS	Correspondence with claimant Suzanne Kochen	0.10
06/27/2023	PNM	Reviewing hayes attempted response re objection to wage claim	0.10
06/27/2023	PNM	Reviewing order compelling disposal of settled matter	0.10
06/27/2023	PNM	Revising settlement agreement and preparing related stipulation to entry of final judgment and stipulated judgment	0.70
06/27/2023	PNM	Correspondence to resorts world counsel re revised settlement agreement	0.10
06/28/2023	KS	Update claim treatment dispute sheet and provide instructions to paralegal re filing of proposed order for second omnibus wage claims	0.20
06/28/2023	KC	Confer with Keenan Smith re: order procedure for 2nd Omnibus Objection to Wage Claims; and update spreadsheet.	0.30
06/28/2023	KS	Call with Suzanne Kochen	0.30
06/28/2023	PNM	Reviewing matter re kochen response to claim objection and instructions to attorney smith re same	0.20
06/28/2023	PNM	Correspondence from co-counsel re fourth omnibus objection to wage claims	0.10
06/28/2023	PNM	Correspondence from and to resorts world counsel re settlement agreement	0.10
06/28/2023	PNM	Telephone conference with resorts world counsel re settlement agreement	0.10
06/29/2023	KC	Review proposed order on second omnibus objection to wage claims.	0.20
06/29/2023	PNM	Reviewing opposing counsel revisions to resorts world settlement agreement and revising same	0.50
06/29/2023	PNM	Correspondence to opposing counsel re revised settlement agreement	0.10
06/29/2023	PNM	Reviewing response from nicholoson to second omnibus objection to wage claim and preparing responsive memo to same	0.20
06/29/2023	PNM	Reviewing proposed order on second omnibus wage claim and instructions to staff re same	0.10
06/29/2023	PNM	Preparing memo to to client re treatment of officers in second wage claim objection in light of settlement on D&O matter	0.20
06/30/2023	KC	Confer with Paul Mascia re: proposed order on second omnibus objection to wage claims.	0.10

06/30/2023	KC	Review email from claimant Mark Haslam and add to spreadsheet.			0.20
			Quantity Subtotal		119.7
			Services Subtotal		\$39,117.50

Expenses

Date	Description	Quantity	Rate	Total
06/12/2023	Nextpoint invoice #22584 Data storage through 5/31/23	1.00	\$300.00	\$300.00
06/26/2023	Hotel accommodations for Attorney Mascia in Miami to attend mediation.	1.00	\$585.53	\$585.53
			Expenses Subtotal	\$885.53

Time Keeper	Quantity	Rate	Total
Paul Mascia	0.2	\$450.00	\$90.00
Paul Mascia	48.8	\$425.00	\$20,740.00
Michael A. Nardella	3.6	\$450.00	\$1,620.00
Matthew Silbernagel	39.3	\$250.00	\$9,825.00
Karen Cooper	4.3	\$225.00	\$967.50
Keenan Smith	23.5	\$250.00	\$5,875.00
		Quantity Total	119.7
		Subtotal	\$40,003.03
		Total	\$40,003.03

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12683	02/01/2023	\$15,795.00	\$0.00	\$15,795.00
12125	03/02/2023	\$6,125.50	\$0.00	\$6,125.50
12377	05/04/2023	\$22,973.84	\$0.00	\$22,973.84
12378	05/04/2023	\$16,821.55	\$0.00	\$16,821.55

12682	06/20/2023	\$22,293.18	\$0.00	\$22,293.18
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Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12840	07/17/2023	\$40,003.03	\$0.00	\$40,003.03
Outstanding Balance				\$124,012.10
Total Amount Outstanding				\$124,012.10

IOLTA Trust Account

Date	Type	Description	Matter	Receipts	Payments	Balance
09/26/2022	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$96,392.49	\$96,392.49
10/03/2022		Payment for invoice #9678	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$28,215.25		\$68,177.24
10/03/2022		Payment for invoice #9828	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$34,164.21		\$34,013.03
10/03/2022		Payment for invoice #9992	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,520.00		\$22,493.03
10/03/2022		Payment for invoice #10355	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$9,977.50		\$12,515.53
10/03/2022		Payment for invoice #10462	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$5,735.53		\$6,780.00
10/03/2022		Payment for invoice #10653	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$6,780.00		\$0.00
02/13/2023	Incoming Wire		3101-00003/Healy-Adv. Crystal Cruises, LLC		\$48,432.84	\$48,432.84
02/14/2023		Payment for invoice #10962	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,335.26		\$37,097.58
02/14/2023		Payment for invoice #11199	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,336.78		\$32,760.80
02/14/2023		Payment for invoice	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$16,538.50		\$16,222.30

#11200				
02/14/2023	Payment for invoice #11365	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$11,444.80	\$4,777.50
02/14/2023	Payment for invoice #11638	3101-00003/Healy-Adv. Crystal Cruises, LLC	\$4,777.50	\$0.00
IOLTA Trust Account Balance				\$0.00

Please make all amounts payable to: Nardella & Nardella, PLLC

Payment Link: <https://app.clio.com/link/7TanFHmGYd6d>

Payment is due upon receipt.

135 W. Central Blvd., Suite 300
Orlando, Florida 32801

INVOICE

Invoice # 12840
Date: 07/17/2023



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.

EXHIBIT 2
(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 OF FEES AND EXPENSES
INCURRED BY NARDELLA & NARDELLA, PLLC, AS COUNSEL TO THE
ASSIGNEE FOR THE PERIOD OF JANUARY 1, 2023 THROUGH JUNE 30, 2023**

THIS CAUSE came before the Court upon the *Motion for Approval of Fees and Expenses Incurred by Nardella & Nardella, PLLC, as Counsel to the Assignee for the Period of 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 Nardella & Nardella, PLLC seeks compensation in the amount of \$120,153.00 and reimbursement of expenses in the amount of \$3,859.10, for a total award of \$124,012.10, 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 objections to the Motion have been filed, finding that notice of the Motion was sufficient, and good cause appearing, it is hereby

ORDERED that:

1. The Motion is hereby **GRANTED**.
2. Nardella & Nardella, PLLC, as counsel to the Assignee, is awarded fees in the amount of \$120,153.00 and expenses in the amount of \$3,859.10, for a total award of \$124,012.10, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Nardella & Nardella, PLLC the sum of \$124,012.10, which is the balance owed.
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 Nardella & Nardella, 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 WALSH
Circuit Court Judge

Copies furnished to:

Counsel of record