

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

COMPLEX BUSINESS LITIGATION
DIVISION

In re:

CRYSTAL CRUISES LLC, a California
limited liability company,

Case No. 2022-002742-CA-01
Lead Case

CRYSTAL HOLDINGS U.S., LLC, a
Delaware limited liability company,

Case No. 2022-002757-CA-01

CRYSTAL AIRCRUISES, LLC, a Florida
limited liability company, and

Case No. 2022-002758-CA-01

Assignors,
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

_____ /

ASSIGNEE'S FORTY-FOURTH OMNIBUS OBJECTION TO CLAIMS

THIS IS AN OBJECTION TO YOUR CLAIM. THE ASSIGNEE IS ASKING THE COURT TO MODIFY OR DISALLOW THE CLAIM THAT YOU FILED IN THIS ASSIGNMENT FOR THE BENEFIT OF CREDITORS CASE. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 TO THIS OBJECTION.

YOU SHOULD IMMEDIATELY CONTACT THE ASSIGNEE'S OFFICE AT CRYSTALCLAIMSOBJ@MOECKER-CRYSTAL.COM TO RESOLVE THE DISPUTE. IF YOU DO NOT CONTACT THE ASSIGNEE'S OFFICE WITHIN 21 DAYS OF SERVICE OF THIS OBJECTION, THE ASSIGNEE AND THE COURT WILL PRESUME THAT YOU DO NOT OPPOSE THE OBJECTION TO YOUR CLAIM, AND YOUR CLAIM MAY BE DISALLOWED OR MODIFIED WITHOUT FURTHER NOTICE OR A HEARING.

Mark C. Healy (the “Assignee”), solely in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC, Crystal Holdings U.S. LLC, and Crystal AirCruises LLC (collectively, the “Assignors”), files this omnibus objection to claims (the “Objection”), and in support thereof, states as follows:

BACKGROUND

1. On February 10, 2022, the Assignors executed and delivered, and the Assignee accepted, irrevocable assignments for the benefit of creditors to the Assignee (collectively, the “Assignments”). On February 11, 2022 (the “Petition Date”), a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for each of the Assignors, thereby commencing the following assignment for the benefit of creditors cases pursuant to Chapter 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01, *In re Crystal Holdings U.S. LLC*, Case No. 2022-002757-CA-01, and *In re Crystal Aircruises LLC*, Case No. 2022-002758-CA-01 (collectively, the “Assignment Cases”). On March 3, 2022, the Court entered orders in each of the Assignment Cases consolidating and jointly administering the Assignment Cases for procedural purposes.

RELIEF REQUESTED

2. Section 727.108(10) of the Florida Statutes provides that the Assignee shall “[e]xamine the validity and priority of all claims against the estate.” Furthermore, section 727.113(1) of the Florida Statutes provides that the Assignee “may file with the court an objection to a claim ...”

3. Section 727.109(4) of the Florida Statutes provides that the Court shall have the power to “allow or disallow claims against the estate and determine their priority ...”

4. The Assignee has examined the proofs of claim identified on **Exhibit 1**, and any documentation provided supporting such claims, and has determined that such claims should be modified or disallowed for the reasons set forth on **Exhibit 1**.

5. Accordingly, the Assignee files this Objection seeking to modify or disallow claims as set forth on the attached **Exhibit 1**.

PROCEDURES FOR CONSUMER AND EMPLOYEE CLAIMS OBJECTIONS

6. On February 28, 2023, the Court entered an order approving procedures for filing and resolving objections to consumer and employee claims in the Assignment Cases (the “Claims Procedure Order”).

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

8. Pursuant to the Claims Procedure Order, if a claimant disputes this Objection to their claim, then within 21 days of service of this Objection, such claimant must contact the Assignee via email at crystalclaimsobj@moecker-crystal.com to attempt to resolve the dispute. If a claimant fails to contact the Assignee within the required time period, the Assignee and the Court will presume that such claimant does not oppose the relief requested in this Objection, and the Assignee may submit an order to the Court sustaining this Objection as it relates to such claimant without any further notice or hearing. Upon entry, the Assignee will serve such order upon the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

9. Pursuant to the Claims Procedure Order, if a claimant contacts the Assignee within the required time period, and thereafter, the Assignee determines that the Assignee and the

claimant are unable to resolve the dispute, the Assignee may file a Notice of Impasse with the Court identifying the unresolved claim. The Notice of Impasse will be served by the Assignee on the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

10. Pursuant to the Claims Procedure Order, following the filing of a Notice of Impasse by the Assignee, the claimant must file with the Court a written response to this Objection within 21 days (a “Response”). If the claimant fails to file the Response with the Court within the required 21-day period, the Assignee and the Court will presume that such claimant does not oppose the relief requested in this Objection, and the Assignee may submit an order to the Court sustaining this Objection as it relates to such claimant without any further notice or hearing. Upon entry, the Assignee will serve such order upon the subject claimant via email or, if the Assignee does not have an email address for the subject claimant, via U.S. Mail.

11. Pursuant to the Claims Procedure Order, a Response must be timely filed with the Court and include:

- a. a statement setting forth the particular Objection (*e.g.*, the Assignee’s *First* Omnibus Objection to Claims or the Assignee’s *Fifth* Omnibus Objection to Claims) and the particular claim(s) to which the Response is directed, including the claim number;
- b. a concise statement setting forth the reasons why the Court should not grant the Objection with respect to such claim, including the factual and legal bases upon which the claimant relies in opposing the Objection;
- c. a copy of any other documentation or other evidence of the claim, to the extent not already included with the claim, upon which the claimant will rely in opposing the Objection, provided that confidential, proprietary, or otherwise protected information should not be publicly filed with the Court, but the existence of such information should be disclosed to counsel for the Assignee; and

- d. the name, address, telephone number, and email address of the responding claimant and/or the name, address, telephone number, and email address of the claimant's attorney or designated representative

12. If a claimant files a Response within the required time period, the Assignee, in the Assignee's sole discretion, may set the matter for a preliminary non-evidentiary hearing. The Assignee may set multiple claims objections to be heard in a single preliminary non-evidentiary hearing.

13. The Assignee shall be permitted to file a reply to any Response no later than 2 calendar days before the preliminary non-evidentiary hearing with respect to the relevant Objection. No sur-reply shall be permitted absent prior Court approval.

14. If the matter is not resolved at the preliminary non-evidentiary hearing, the Assignee and the claimant shall make a further attempt to resolve the matter. Thereafter, if the matter remains unresolved, the Assignee, in the Assignee's sole discretion, may set the matter for evidentiary hearing.

15. The Assignee may, in his sole discretion and in accordance with other orders of the Court, settle the validity, priority, amount, nature, or extent of contested claims without any further notice, order, or approval of the Court

16. Pursuant to the Claims Procedure Order, if allowed, the first \$10,000 of an employee claim will be deemed a priority claim pursuant to Fla. Stat. § 727.114(d) without further notice, order, or approval of the Court, and the balance of any such claim will be deemed a general unsecured claim pursuant to Fla. Stat. § 727.114(f).

17. Pursuant to the Claims Procedure Order, if allowed, the first \$2,225 of a consumer claim will be deemed a priority claim pursuant to Fla. Stat. § 727.114(e) without further notice,

order, or approval of the Court, and the balance of any such claim will be deemed a general unsecured claim pursuant to Fla. Stat. § 727.114(f).

18. The Assignee reserves all rights to amend and supplement this Objection and file further objections.

WHEREFORE, the Assignee respectfully requests that the Court enter an order sustaining this Objection, granting the relief requested herein, and granting any other relief the Court deems just and proper.

Dated: October 12, 2023.

BERGER SINGERMAN LLP
Co-Counsel for Assignee
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By: /s/ Samuel J. Capuano
Paul Steven Singerman
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Samuel J. Capuano
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on October 12, 2023 to all parties that have entered an appearance in this case; and via email to all claimants listed on the attached **Exhibit 1** pursuant to the Claims Procedure Order.

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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	Adele Rowe & Bruce Rowe	C9645	\$ 25,396.56	CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$18,534.56
44.OBJ23.10-02C	Alan Melcher	C6953	\$ 26,408.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$20,698.00
44.OBJ23.10-02C	Alana Dean Cline	C5063	\$ 2,992.80	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$539.00
44.OBJ23.10-02C	Ann Cole Gerrard	C8404	\$ 1,088.85	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Arnold Kaston & Esther Kranz	C8348	\$ 400.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	BRUCE RAVID	C11189	\$ 1,924.75	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Carol Powell	C10185	\$ 9,871.50	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Charles & Susan H Kilian	C8346	\$ 2,022.90	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Charles Kasik, III & Cornelia A Brenneman-Kasik	C8436	\$ 10,144.28	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Charles S. Harris	C10362	\$ 140,688.20	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Clarence F Lewis Jr	C5039	\$ 12,210.00	PART OF THIS CLAIM IS FOR A COMPLETED VOYAGE.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$6,416.67
44.OBJ23.10-02C	Darlene Gardner	C2950	\$ 9,322.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$5,232.50
44.OBJ23.10-02C	Darren & Laura Glass	C9290	\$ 8,028.00	CLAIMANTS WERE REFUNDED BY CRYSTAL IN 2022.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Dave Urich	C5058	\$ 13,816.15	PART OF CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$6,675.00	\$3,432.90
44.OBJ23.10-02C	David Howse	C8448	\$ 3,657.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	David J Brown & Cheryl D Brown	C11634	\$ 31,713.10	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Dwain Carlo Crum	C8460	\$ 26,863.50	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Edward Fong	C8356	\$ 6,397.20	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	Frederick & Katherine Pieper	C8397	\$ 1,297.10	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Galen Fox & Sharon Moriwaki	C8422	\$ 22,479.50	CLAIMANTS HAVE BEEN COMPENSATED BY CREDIT CARD COMPANIES (VISA OR MASTERCARD AND AMERICAN EXPRESS). THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Gary & Patricia Gondek	C8475	\$ 9,154.00	CLAIM WAS FILED AFTER THE CLAIMS BAR DATE. PART OF THIS CLAIM IS FOR INCENTIVE COUPONS WITH NO CASH VALUE. PART OF THIS CLAIM IS FOR COUPONS THAT EXPIRED IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	GILMORE JONES	C5288	\$ 7,866.28	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,333.20	\$0.00
44.OBJ23.10-02C	Graciela Escobar	C10345	\$ 1,000.00	CLAIM WAS FILED PART THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Greg & Kristine Ticknor	C8377	\$ 36,601.98	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2020. THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Harriet S Cole	C8425	\$ 4,428.00	CLAIM WAS FILED PART THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Herbert Todd Shafer	C8362	\$ 2,239.50	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Ingrid LeBlanc	C8423	\$ 30,357.65	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	James Katz	C11177	\$ 1,256.90	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Javier Repetto & Kimberly Hillman	C4938	\$ 2,570.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Jeffery Clifford Haertel & Kathleen Mary Haertel	C4972	\$ 1,743.50	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Jiewen Zhong	C9003	\$ 4,724.85	CLAIM IS FOR AGENT COMMISSIONS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$4,724.85
44.OBJ23.10-02C	Jodi Monroe	C8382	\$ 1,000.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	John & Joyce North	C9452	\$ 40,232.26	CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2020 & 2021. CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS). PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$25,522.40
44.OBJ23.10-02C	John McKinnon	C11180	\$ 18,288.82	CLAIMANT HAS BEEN COMPENSATED IN PART BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO). THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Joseph Elam	C6778	\$ 41,384.60	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$27,104.60
44.OBJ23.10-02C	Judith Marie Wheeler	C5091	\$ 10,675.79	CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD), TRAVEL INSURANCE COMPANY AND OTHER SOURCES.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$1,357.11

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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	June Atwood	C4934	\$ 1,499.41	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,000.00	\$0.00
44.OBJ23.10-02C	Kathy Guerra	C8396	\$ 1,082.85	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Kimberley Maciver	C8474	\$ 19,006.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Kurt & Joyce Nicholas	C5162	\$ 3,301.90	PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,301.90	\$0.00
44.OBJ23.10-02C	Lillian Neilson	C11511	\$ 11,204.40	CLAIMANT HAS BEEN COMPENSATED IN PART BY THE TRAVEL INDUSTRY COUNCIL OF ONTARIO (TICO). THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Louis & Joan Katz	C4955	\$ 16,413.96	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANTS TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$10,841.96
44.OBJ23.10-02C	Man Fai Huang & Wai Hung Ho	C7684	\$ 2,591.02	CLAIM WAS SUBMITTED BY TRAVEL AGENT ON BEHALF OF CLAIMANTS AND IS A DUPLICATE OF ANOTHER CLAIM SUBMITTED BY CLAIMANTS.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Manny & Patricia Tehrani	C8355	\$ 3,814.20	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Marc Eduard J. Ooms	C9955	\$ 44,248.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$35,988.00
44.OBJ23.10-02C	Margaret Kelley	C6261	\$ 14,967.76	PART OF THIS CLAIM IS DUPLICATED. CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,460.76	\$0.00
44.OBJ23.10-02C	Maria N Haverly	C8323	\$ 1,009.50	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Mark & Joyce Even	C8381	\$ 1,902.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Martin Bruce Hirsch	C6808	\$ 29,438.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$23,278.00
44.OBJ23.10-02C	Mary Marguerite Buty & Richard Michael Johnson	C4901	\$ 33,769.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$26,458.90
44.OBJ23.10-02C	Mary Mizuno Santa Helena	C8383	\$ 5,478.75	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Maryse Bergeron	C8390	\$ 3,509.70	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Maurice O'meara	C4956	\$ 58,819.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2019.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$6,675.00	\$29,072.00

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

EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	Michael Druyen	C8439	\$ 3,099.05	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Michael Gazda	C8443	\$ 7,999.00	CLAIM WAS FILED PART THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Michele L Zaleski & Tony Lynn Drake	C8428	\$ 200.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Myron Wong and Abbielyn Wong	C10320	\$ 54,911.58	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Nancy Russian and Luis Rodriguez	C10172	\$ 500.00	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Odon L Bacque Jr	C8435	\$ 4,741.44	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Patricia Kasprow	C2325	\$ 7,109.10	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$2,225.00	\$4,884.10
44.OBJ23.10-02C	Patricia Kasprow	C2326	\$ 3,754.65	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$3,754.65
44.OBJ23.10-02C	Patrick Joseph Smiley	C11172	\$ 5,519.40	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Paul Switzer & Teresa Switzer	C10397	\$ 7,790.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Peter F. & Kathryn A. Novak	C8468	\$ 14,026.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Po Nicola Lee	C8828	\$ 7,770.00	CLAIM IS FOR COUPONS THAT EXPIRED IN 2021. CLAIMANT WAS REFUNDED BY CRYSTAL IN 2020.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Raymond J Puzio	C8477	\$ 5,443.50	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Rebecca L Olness	C5057	\$ 8,204.60	PART OF THIS CLAIM IS FOR A COMPLETED VOYAGE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,007.60	\$0.00
44.OBJ23.10-02C	Renee Rosenstock	C11469	\$ 23,992.81	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Richard Graeme & Alice Rohrsen	C8457	\$ 116,868.50	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE. CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Robert & Tracey Katz	C9655	\$ 29,670.70	CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2021. PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANTS HAVE BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$19,188.61
44.OBJ23.10-02C	Robert Bianco	C8400	\$ 4,003.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Robert Blong & Linda Nolan Long	C5126	\$ 23,106.62	CLAIMANTS WERE REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$17,656.62
44.OBJ23.10-02C	Robert Buntin	C5075	\$ 1,922.36	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,769.70	\$0.00
44.OBJ23.10-02C	Robert Cimino	C5274	\$ 2,630.60	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL INSURANCE PREMIUM.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,626.60	\$0.00
44.OBJ23.10-02C	Robert Curry & Patricia Curry	C8466	\$ 19,080.70	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	Robert David Gober	C8447	\$ 6,898.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Ronnie Gajeske	C5282	\$ 5,820.49	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$4,197.50	\$0.00
44.OBJ23.10-02C	Rosemarie Standifer O'neal	C2952	\$ 9,322.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$5,232.50
44.OBJ23.10-02C	Ruben Flores	C4984	\$ 4,431.60	PART OF CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$4,224.20	\$0.00
44.OBJ23.10-02C	Ryan Downtown	C8392	\$ 68,550.75	CLAIMANT HAS BEEN COMPENSATED BY CREDIT CARD COMPANY (AMERICAN EXPRESS). THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Sandra Cohen	C759	\$ 18,570.60	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020. CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$10,606.08	\$0.00
44.OBJ23.10-02C	Scott & Shari Seling	C8394	\$ 3,887.70	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Simon Trench & Pierre Nguyen	C11494	\$ 2,559.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Stephen Norris	C5287	\$ 14,146.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$7,716.00
44.OBJ23.10-02C	Steve & Cathy Mosteiro	C2420	\$ 15,742.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIMANTS HAVE BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Steve & Cathy Mosteiro	C2422	\$ 7,434.00	CLAIMANTS HAVE BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Steven Jay Cavalier	C8398	\$ 24,849.94	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Steven Raheb	C5089	\$ 39,796.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$8,900.00	\$25,316.00
44.OBJ23.10-02C	Susan and David Poesl	C10166	\$ 6,374.00	CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Susan B Dalton	C2255	\$ 11,978.08	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (AMERICAN EXPRESS).	REDUCE CLAIM AMOUNT, CONSOLIDATE CLAIMS C3410 & C2255. ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$8,900.00	\$18,070.38
44.OBJ23.10-02C	Susan B Dalton	C3410	\$ 17,137.20	CLAIM IS ONE OF TWO CLAIMS FILED BY CLAIMANT. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	CONSOLIDATE CLAIMS C3410 & C2255.	\$0.00	\$0.00
44.OBJ23.10-02C	Susan Ford	C8445	\$ 3,439.20	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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EXHIBIT 1

REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
44.OBJ23.10-02C	Sylvie Carbonnaux	C11153	\$ 8,113.00	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Tracy Sherman	C5037	\$ 1,486.75	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Valentina Wicki	C8459	\$ 2,966.75	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Vanesa Gonzalez & Alejandro Morales	C8411	\$ 34,372.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. THIS CLAIM WAS FILED AFTER THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	WAYNE T & BEVERLY E YAMAUCHI	C11195	\$ 3,200.55	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	Wende	C9050	\$ 500.00	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2022.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	William J Jones & Terri P Jones	C8402	\$ 25,799.04	THIS CLAIM WAS FILED PAST THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
44.OBJ23.10-02C	William Messick	C6941	\$ 64,477.02	PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$57,361.72

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