

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-SIXTH 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: November 7, 2023.

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

I HEREBY CERTIFY a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on November 7, 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
46.OBJ23.11-01C	AARON & EMILY TANENBAUM	C11238	\$ 6,778.00	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	\$2,128.00
46.OBJ23.11-01C	Andy KS & Elaine CY Luk	C10897	\$ 5,552.00	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	\$752.00
46.OBJ23.11-01C	Andy Szeto	C11618	\$ 4,515.75	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020. CLAIM IS FOR A PAST VOYAGE WHERE CLAIMANT CANCELLED WITHIN THE APPLICABLE PENALTY PERIOD.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Anita Nihei	C7566	\$ 1,262.40	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2022.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$200.00	\$0.00
46.OBJ23.11-01C	Annette Easton	C4423	\$ 8,306.16	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,641.24	\$0.00
46.OBJ23.11-01C	Arthur & Jennifer Block	C2177	\$ 4,953.50	CLAIM IS ONE OF EIGHT CLAIMS FILED BY CLAIMANTS. EACH CLAIMANT IS ENTITLED TO ONE PRIORITY PAYMENT.	ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS GENERAL UNSECURED CLAIM.	\$4,450.00	\$503.50
46.OBJ23.11-01C	Arthur & Jennifer Block	C2178	\$ 1,000.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,000.00
46.OBJ23.11-01C	Arthur & Jennifer Block	C2180	\$ 1,000.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,000.00
46.OBJ23.11-01C	Arthur & Jennifer Block	C2181	\$ 1,000.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$1,000.00
46.OBJ23.11-01C	Arthur & Jennifer Block	C2182	\$ 5,262.00	CLAIMANT(S) IS/ARE NOT ENTITLED TO MULTIPLE PRIORITY CLAIMS.	RECLASSIFY AS A GENERAL UNSECURED CLAIM.	\$0.00	\$5,262.00
46.OBJ23.11-01C	Arthur & Jennifer Block	C2184	\$ 3,210.00	CLAIM IS FOR A PAST VOYAGE WHERE CLAIMANT CANCELLED WITHIN THE APPLICABLE PENALTY PERIOD. CLAIMANT WAS REFUNDED IN FULL BY CRYSTAL IN 2022.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Benjamin & Marietou Lodmell	C8826	\$ 9,908.00	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	\$4,158.00
46.OBJ23.11-01C	Bobby Joe Kennedy	C10788	\$ 12,753.83	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	\$7,461.17
46.OBJ23.11-01C	Brent Morris	C5419	\$ 3,051.25	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Catherine Solomon & David Solomon	C3765	\$ 2,565.48	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.	\$2,332.00	\$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
46.OBJ23.11-01C	Chad Wallace	C7628	\$ 2,729.52	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,373.50	\$0.00
46.OBJ23.11-01C	Christian V. Young & Lisa D. Young	C4510	\$ 6,479.50	PART OF THIS CLAIM REPRESENTS AMOUNTS INVOICED TO CLAIMANT BUT NEVER PAID TO CRYSTAL.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$1,872.50
46.OBJ23.11-01C	Colin Higgins	C8624	\$ 11,808.00	PART OF THIS CLAIM REPRESENTS AMOUNTS INVOICED TO CLAIMANT BUT NEVER PAID TO CRYSTAL.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$810.00	\$0.00
46.OBJ23.11-01C	Corneliu Dan Faur	C11152	\$ 9,013.90	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	\$3,814.50
46.OBJ23.11-01C	Craig & Alison Campbell	C11444	\$ 6,998.00	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	\$1,548.00
46.OBJ23.11-01C	Daniel Thomas Wessner & Nicole Helena Curschellas Wessner	C4226	\$ 4,140.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,312.00	\$0.00
46.OBJ23.11-01C	David R Bohne & Thomas J Bye	C3463	\$ 8,293.00	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	\$3,053.00
46.OBJ23.11-01C	David Ratto	C10374	\$ 12,198.00	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	\$6,248.00
46.OBJ23.11-01C	Dawn & Michael Bowser	C8889	\$ 10,076.72	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020. CLAIM IS FOR A PAST VOYAGE WHERE CLAIMANT CANCELLED WITHIN THE APPLICABLE PENALTY PERIOD.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$3,668.26
46.OBJ23.11-01C	Dawn Kreiner	C10053	\$ 8,566.80	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$3,724.80
46.OBJ23.11-01C	Donna L. Sushinsky	C4316	\$ 14,866.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021. PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$6,183.00

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
46.OBJ23.11-01C	Dorothy K McDowell	C5915	\$ 12,547.80	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	\$7,153.80
46.OBJ23.11-01C	Douglas & Debra Gwin	C1245	\$ 14,040.00	PART OF THIS CLAIM REPRESENTS AMOUNTS INVOICED TO CLAIMANT BUT NEVER PAID TO CRYSTAL.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$392.00	\$0.00
46.OBJ23.11-01C	Edwin Salvesen	C6170	\$ 400.00	PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$200.00	\$0.00
46.OBJ23.11-01C	Elaine Jones	C4432	\$ 28,321.00	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	\$22,401.95
46.OBJ23.11-01C	Elizabeth & Adam Richardson	C11101	\$ 13,390.00	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	\$8,548.00
46.OBJ23.11-01C	Emilio Antunano	C8471	\$ 13,350.00	CLAIM IS FOR A PAST VOYAGE WHERE CLAIMANT CANCELLED WITHIN THE APPLICABLE PENALTY PERIOD. CLAIM IS FOR A COUPON THAT EXPIRED IN 2020.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Eugene B Lockhart & Diane M Lockhart	C4574	\$ 4,610.41	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. 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.	\$3,629.15	\$0.00
46.OBJ23.11-01C	Evelyne C Lau	C10913	\$ 3,632.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$1,232.00
46.OBJ23.11-01C	Forrest Ashley	C4209	\$ 14,856.00	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	\$3,266.00
46.OBJ23.11-01C	Francis Dumanoir	C11326	\$ 14,380.00	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	\$9,074.00
46.OBJ23.11-01C	Gabriel Franco & Janet Jessiman	C8994	\$ 14,285.02	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	\$7,903.12

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
46.OBJ23.11-01C	Gail Davis & Edwin Davis	C4251	\$ 8,897.28	PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$3,348.28
46.OBJ23.11-01C	Gary & Claire Adair	C2929	\$ 800.00	CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Geoffrey & Heidi Smith	C8444	\$ 17,804.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE. CLAIM WAS FILED PART THE CLAIMS BAR DATE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Georgina Spigel	C10370	\$ 10,444.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$2,225.00	\$8,023.00
46.OBJ23.11-01C	GERALD MACKULAK	C6249	\$ 1,974.50	CLAIM IS FOR A PAST VOYAGE WHERE CLAIMANT CANCELLED WITHIN THE APPLICABLE PENALTY PERIOD.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,774.50	\$0.00
46.OBJ23.11-01C	Helen Lee Horne	C7562	\$ 10,813.84	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	\$4,138.76
46.OBJ23.11-01C	HENRY & ALDEN PFLAGER	C6233	\$ 3,587.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2019.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,000.00	\$0.00
46.OBJ23.11-01C	Henry Majer	C4411	\$ 607.99	CLAIM IS FOR A COMPLETED VOYAGE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$100.00	\$0.00
46.OBJ23.11-01C	Holly Spragne	C11495	\$ 7,900.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020 & 2021.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$4,400.00	\$0.00
46.OBJ23.11-01C	James & Gloria Fohrman	C10665	\$ 10,804.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2019 & 2021. AGENT WAS REFUNDED BY CRYSTAL 2020.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$5,408.00
46.OBJ23.11-01C	James Garvin	C10076	\$ 10,790.00	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	\$5,948.00
46.OBJ23.11-01C	Jeffrey Gates	C11060	\$ 39,708.18	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.	\$13,350.00	\$24,376.98
46.OBJ23.11-01C	Jennifer L Roy	C11471	\$ 10,363.40	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,907.00	\$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
46.OBJ23.11-01C	Joanne Wong Che & Chun Yee Che	C4114	\$ 7,498.00	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	\$1,548.00
46.OBJ23.11-01C	John DANFORTH	C6291	\$ 5,246.40	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$200.00	\$0.00
46.OBJ23.11-01C	John Withers	C11428	\$ 12,129.62	PART OF THIS CLAIM REPRESENTS AMOUNTS INVOICED TO CLAIMANT BUT NEVER PAID TO CRYSTAL.	REDUCE CLAIM AMOUNT, ALLOW PARTIAL PRIORITY PAYMENT AND RECLASSIFY BALANCE AS A GENERAL UNSECURED CLAIM.	\$4,450.00	\$6,252.48
46.OBJ23.11-01C	Jorg Riedel & Eugenia Braun de Riedel	C4271	\$ 9,936.00	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	\$5,094.00
46.OBJ23.11-01C	Karen Hiers	C7625	\$ 6,798.00	PART 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	\$1,786.00
46.OBJ23.11-01C	Karl & Barbara Coulter	C10371	\$ 13,426.58	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	\$8,584.58
46.OBJ23.11-01C	Kevin & Diane Wilshere	C8977	\$ 4,268.80	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,712.00	\$0.00
46.OBJ23.11-01C	Larry & Sharon Pearson	C1661	\$ 16,212.50	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020. 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	\$7,320.00
46.OBJ23.11-01C	LAWRENCE & REBECCA O'NEILL	C133	\$ 12,272.00	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	\$5,167.00
46.OBJ23.11-01C	Lee Roussel & Christian Roussel	C4337	\$ 14,076.00	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	\$8,126.00
46.OBJ23.11-01C	Lien McDonagh	C6380	\$ 12,495.60	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.	\$4,450.00	\$7,766.00

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REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
46.OBJ23.11-01C	Linda & Michael Baessler	C3404	\$ 8,851.50	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Louis Van Osselaer	C11403	\$ 15,078.00	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	\$9,998.00
46.OBJ23.11-01C	M. Stephane Lasselle & Marie Josee Doyon	C4218	\$ 10,418.00	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	\$3,668.50
46.OBJ23.11-01C	Mai Lisa Nelson & Blaine Nelson	C4460	\$ 22,057.50	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	\$13,196.00
46.OBJ23.11-01C	Majorie Louise Gardner	C7641	\$ 6,084.50	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$898.93	\$0.00
46.OBJ23.11-01C	Margaret A Beckett	C1937	\$ 10,622.50	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	\$6,273.00
46.OBJ23.11-01C	Margaret E. Doane	C5309	\$ 4,408.50	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	\$1,765.00
46.OBJ23.11-01C	Maria Leticia Quintanilla	C4267	\$ 18,868.50	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	\$12,401.00
46.OBJ23.11-01C	Marie-Odile Cagnat Chow	C4243	\$ 9,750.00	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	\$3,800.00
46.OBJ23.11-01C	Melvin P & Etta Marie J Edwards	C11187	\$ 9,908.00	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	\$4,158.00
46.OBJ23.11-01C	Michael & Victoria Buchler	C3985	\$ 350.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$200.00	\$0.00
46.OBJ23.11-01C	Michael Benstock	C10964	\$ 8,747.85	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2022.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$5,731.35	\$0.00

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REFERENCE	CLAIMANT NAME(S)	CLAIM NUMBER	SUBMITTED CLAIM AMOUNT	GROUNDS FOR OBJECTION	PROPOSED TREATMENT	CONSUMER PRIORITY AMOUNT	GENERAL UNSECURED AMOUNT
46.OBJ23.11-01C	Michael S Gordon	C3573	\$ 4,713.85	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020 & 2021.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,095.00	\$0.00
46.OBJ23.11-01C	Nancy Ketner	C5328	\$ 494.85	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Nancy Marcone	C11436	\$ 500.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Norman Altman	C9093	\$ 13,678.00	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	\$6,253.50
46.OBJ23.11-01C	Norman Majer	C4412	\$ 607.99	CLAIM IS FOR A COMPLETED VOYAGE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$100.00	\$0.00
46.OBJ23.11-01C	Oscar & Terri Reicher	C10127	\$ 4,803.10	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020 & 2021. PART OF THIS CLAIM IS DUPLICATED.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$4,193.60	\$0.00
46.OBJ23.11-01C	Pak Cheong Fung	C8856	\$ 2,322.50	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Paul & Diane Semach	C7671	\$ 9,064.08	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	\$4,222.08
46.OBJ23.11-01C	Paul M Mahoney	C3492	\$ 6,354.50	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,207.00	\$0.00
46.OBJ23.11-01C	PETER FUNG	C10773	\$ 12,880.00	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2020.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,490.00	\$0.00
46.OBJ23.11-01C	Renee Hanson & Peter Weber	C8304	\$ 11,366.00	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	\$6,356.00
46.OBJ23.11-01C	Ricky & Kathleen Lines	C7554	\$ 1,000.00	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Robert Snierciak	C11429	\$ 7,736.80	CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Rolonde Marchand	C4040	\$ 8,577.00	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$817.00	\$0.00
46.OBJ23.11-01C	Ronald Oest & Mirasol Rowe	C6955	\$ 14,134.02	CLAIMANT HAS BEEN COMPENSATED IN PART BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$2,021.37	\$0.00
46.OBJ23.11-01C	Ronald Selner	C11169	\$ 14,150.00	CLAIM IS FOR A COMPLETED VOYAGE.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Samuel D Scott	C3999	\$ 14,682.00	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	\$5,434.00
46.OBJ23.11-01C	Stella Lin & Jennifer Kwock-Lau	C6066	\$ 4,020.25	CLAIMANT WAS REFUNDED IN PART BY CRYSTAL IN 2021.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$3,730.00	\$0.00

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46.OBJ23.11-01C	Stephen Chaudet	C5986	\$ 9,345.00	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	\$4,731.20
46.OBJ23.11-01C	Stuart H Gitlitz	C3553	\$ 14,678.00	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$540.00	\$0.00
46.OBJ23.11-01C	Sue Ann Svoboda	C3880	\$ 1,330.67	PART OF THIS CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$566.82	\$0.00
46.OBJ23.11-01C	Thomas & Nancy O'Hara	C6151	\$ 3,747.50	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2020.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$1,000.00	\$0.00
46.OBJ23.11-01C	Thomas Freeman	C4322	\$ 3,457.81	PART OF THIS CLAIM IS FOR AN INCENTIVE COUPON WITH NO CASH VALUE.	REDUCE CLAIM AMOUNT AND ALLOW PARTIAL PRIORITY PAYMENT.	\$683.31	\$0.00
46.OBJ23.11-01C	Tsay Wang & Che Wang Tseng	C11393	\$ 3,516.42	CLAIM IS FOR AMOUNTS PAID BY CLAIMANT TO THIRD PARTIES FOR TRAVEL EXPENSES.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	Wendy Seidlin	C3199	\$ 629.25	CLAIMANT WAS REFUNDED BY CRYSTAL IN 2021.	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00
46.OBJ23.11-01C	William Szeto & Lizina Szeto	C5974	\$ 9,034.00	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	\$4,192.00
46.OBJ23.11-01C	Winnie Wing Lee & Albert See Wong	C7701	\$ 2,100.00	CLAIMANT HAS BEEN COMPENSATED IN FULL BY CREDIT CARD COMPANY (VISA OR MASTERCARD).	DISALLOW AND EXPUNGE IN ITS ENTIRETY.	\$0.00	\$0.00

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