

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.  
\_\_\_\_\_ /

**ASSIGNEE'S OBJECTION TO CLAIM OF LES SERVICES DIRECT TRAVEL**

**NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING**

**PLEASE TAKE NOTICE** that, Pursuant to section 727.111(4), Florida Statutes, the assignee may disallow improper claims of creditors, and the Court may consider these actions without further notice or hearing unless a party in interest files an objection within 21 days from the date this paper is served. If you object to the relief requested in this paper, you must file your objection with the Clerk of the Court of Miami-Dade County at 73 W. Flagler Street, Room 133, Miami, FL 33130, and serve a copy on the assignee's attorney, Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Blvd., Ste. 300, Orlando, FL 32801, and any other appropriate person.

**If you file and serve an objection within the time permitted, the Court shall schedule a hearing and notify you of the scheduled hearing.**

**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.**

COMES NOW, Mark C. Healy, Assignee in the above-captioned Assignment proceeding (the “Assignee”), pursuant to Section 727.113 and 727.109(4), files this Objection to the Claim of Les Services Direct Travel (“LSDT” or “Claimant”), and asserts as follows:

**BACKGROUND**

1. On February 10, 2022, Crystal Cruises, LLC (the “Assignor”) executed and delivered, and the Assignee accepted, an irrevocable Assignment for the benefit of creditors to the Assignee (the “Assignment”). On February 11, 2022, a *Petition Commencing Assignment for the Benefit of Creditors* was filed by the Assignee for the Assignor, thereby commencing the following assignment for the benefit of creditors case pursuant to Chapter 727 of the Florida Statutes, in this Court: *In re Crystal Cruises LLC*, Case No. 2022-002742-CA-01 (the “Assignment Case”).

2. Prior to the Assignment, Assignor engaged in the business of travel and entertainment business, including operating ocean, river, and expedition cruises and conducting related activities around the world (the “Business”).

3. The Assignee's address and telephone number are c/o Paul N. Mascia, Esq., Nardella & Nardella, PLLC, 135 W. Central Boulevard, Orlando, Florida 32801 and (407) 966-2680.

4. This Honorable Court has the power to allow or disallow claims against the estate and determine their priority. *See* § 727.109(4), *Florida Statutes*.

**OBJECTION TO CLAIM**

5. LSDT delivered Claim No. 2755 with the claim amount of U.S. Dollars \$41,473.87 (the “Claim”) to the Assignee on or about March 10, 2022, a true and correct copy of which Claim is attached hereto as **Exhibit “A”**.

6. Assignee reviewed the Claim and the documentation provided by the Claimant.

7. As indicated in the materials submitted with the Claim, the basis for the Claim is “unpaid trade commissions” owed by the Assignor to the Claimant for the Claimant’s booking of cruises on behalf of consumers.

8. The Assignee confirmed that fees were owed to the Claimant for services provided to the Assignor. However, the Assignor’s records show that the Claimant was only entitled to commission in the amount of \$26,908.47.

9. The following table includes the names of the consumers associated with the Claim, the consumers’ respective booking numbers, and the commission owed for the respective cruise booking per the Assignee’s records:

<b>NAME</b>	<b>Booking #</b>	<b>Commission earned</b>
Redcliffe	2317363	\$645.66
Livingstone	2317924	\$355.13
Sheres	2318880	\$3,246.94
Desjardins	2138498	\$7,175.02
Desjardins	2268237	\$5,830.4
Barry	2274450	\$715.58
Hornstein	2252905	\$1,813.26
Leroux	2177369	\$0
Citron	2244374	\$1,392.64
Hornstein	2252903	\$1,552.1
Hornstein	2252904	\$1,591.62
Dery	2199071	\$2,590.12
		<b>Total: \$26,908.47</b>

10. As such, the Assignee objects to the Claim in the amount of \$41,473.87 and requests that the Claim amount be modified to \$26,908.47 as a general unsecured claim.

WHEREFORE, the Assignee respectfully requests the Court enter an order sustaining his Objection to LSDT's Claim, modifying the Claim to the amount of \$26,908.47 as a general unsecured claim and granting any such further relief that this Court may deem just and proper.

DATED this 7<sup>th</sup> day of February 2024.

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

By: /s/ Paul N. Mascia

Michael A. Nardella, Esq.

Florida Bar No. 051265

Paul N. Mascia, Esq.

Florida Bar No. 0489670

[mnardella@nardellalaw.com](mailto:mnardella@nardellalaw.com)

[pmascia@nardellalaw.com](mailto:pmascia@nardellalaw.com)

[kcooper@nardellalaw.com](mailto:kcooper@nardellalaw.com)

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on February 7, 2024, which will serve upon all parties and interested persons of record in this action; on claimant Les Services Direct Travel via U.S. mail to 400 Sainte-Croix Ave, Suite 1300, St. Laurent, Quebec H4N3L4; and via email to [rschneeberger@dt.com](mailto:rschneeberger@dt.com) and [cbl44@jud11.flcourts.org](mailto:cbl44@jud11.flcourts.org) pursuant to CBL Rule 2.2.

By: /s/ Paul N. Mascia

Paul N. Mascia

# **Exhibit A**

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

2755

In Re:

CRYSTAL CRUISES, LLC  
a California Limited Liability company.

Assignor,

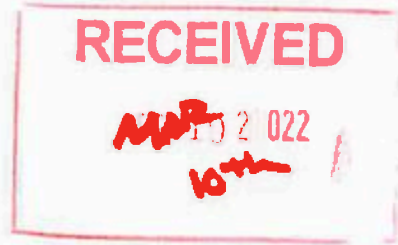
Case No.: 2022-002742 CA 01

To:

MARK C. HEALY,

Assignee,

Les Services Direct Travel/



**PROOF OF CLAIM**

TO RECEIVE ANY DIVIDEND IN THIS PROCEEDING, YOU MUST COMPLETE THIS PROOF OF CLAIM AND DELIVER IT TO THE ASSIGNEE NO LATER THAN:

**JUNE 11, 2022**

THE ASSIGNEE'S NAME AND ADDRESS ARE AS FOLLOWS:

Mark C. Healy, Assignee  
MICHAEL MOECKER & ASSOCIATES, INC.  
1885 Marina Mile Blvd., Suite 106  
Fort Lauderdale, FL 33315  
(954) 252-1560 • (954) 252-2791 Fax No.  
Info@Moecker.com

1. CREDITOR NAME (Your name): Les Services Direct Travel  
ADDRESS: 400 Sainte-Croix Ave, Suite 1300  
St. Laurent, Quebec H4N3L4  
TELEPHONE NUMBER: 1-201-847-2132  
E-MAIL ADDRESS: RSchneeberger@dt.com  
*Please be sure to notify us if you have a change of address.*

2. BASIS FOR CLAIM:  
 Goods Sold                       Wages, Salaries and Compensations                       Secured Creditor  
 Services Performed                       Taxes  
 Money Loaned                       Shareholder                       Other: \_\_\_\_\_

3. DATE DEBT WAS INCURRED: between 3/13/2020 and 2/11/2022

4. AMOUNT OF CLAIM: USD 41473.87

5. SUPPORTING DOCUMENTS: Attach copies of supporting documents, such as promissory notes, purchase order, invoices, itemized statement of running accounts, court judgments, or evidence of security interests. If the documents are not available, explain. If the documents are voluminous, attach a summary.

6. SIGNATURE: Sign and print name and title, if any, of the creditor or other person authorized to file this claim:

DATED: 03/10/2022

BY:   
Signature of Claimant or Representative

Rene Schneeberger Vice-President Leisure Supplier Management  
Print Name and Title Here

**Les Services Direct Travel**  
**400 Sainte-Croix Avenue, Suite 1300**  
**St. Laurent, Quebec H4N3L4**  
**IATA: 69-79986-6**

Les Services Dire			
Account Payable - Open Items			
Vend. ID	Vendor Name	Agent	Departure Date
405	CRYSTAL CRUISES	054 - Evelyn K	1/22/2022
405	CRYSTAL CRUISES	675 - Eirini D	2/12/2022
405	CRYSTAL CRUISES	019- Harvey K	12/22/2021
405	CRYSTAL CRUISES	824 - Christiane M	11/14/2020
405	CRYSTAL CRUISES	824 - Christiane M	5/15/2021
405	CRYSTAL CRUISES	054 - Evelyn K	12/18/2021
405	CRYSTAL CRUISES	060 - Leo C	10/10/2020
405	CRYSTAL CRUISES	144- Rosetta Z	5/16/2020
405	CRYSTAL CRUISES	054 - Evelyn K	7/10/2020
405	CRYSTAL CRUISES	060- Leo C	10/10/2020
405	CRYSTAL CRUISES	060- Leo C	10/10/2020
405	CRYSTAL CRUISES	144- Rosetta Z	6/30/2020
<b>TOTAL (405) CRYSTAL CRUISES</b>			

ct Travel - Québec-Est

past due over 24 days - By Vendor

Guest-booking number	# Days	PNR	Invoice #	Open Amt. USD
REDCLIFFE,KENT MR A2317363	44	MPRPJF	1229889	829.06
LIVINGSTONE,SHERYL MS A2317924	23	WEQFOY	2095292	455.44
SHERES,ALLAN MR A2318880	75	STPG2K	1229306	3,791.84
DESJARDINS,SYLVAIN MR A2138498	478	INAZJG	924564	9,497.97
DESJARDINS,SYLVAIN MR A2138498	296	INAZJG	927479	7,771.41
BARRY,JUNE MRS A2274450	79	MDW0LQ	1229720	915.30
HORNSTEIN,SAMUEL MR A2252905	513	UFNLWG	5087682	2,389.54
LEROUX,MARC A2177369	660	IRGXNR	2080311	6,175.09
CITRON,ROSALIND MRS A2244374	605	MNRQJY	1227413	1,871.08
HORNSTEIN,SAMUEL MR A2252903	513	UFNLWG	5087686	2,108.03
HORNSTEIN,SAMUEL MR A2252904	513	UFNLWG	5087684	2,161.71
DERY,GERALD A2199071	615	FLDPLN	2080658	3,507.40
	<b>660</b>			<b>41,473.87</b>



## Norma Castellon

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**From:** info @Moecker.com  
**Sent:** Tuesday, March 22, 2022 12:12 PM  
**To:** Norma Castellon  
**Subject:** FW: Consolidated Main Case No. 22-002742-CA-01 - Crystal Cruises - claim for unpaid trade commissions - USD41,473.87  
**Attachments:** 2022-03-10-Les Services Direct Travel-Crystal Cruises-Open trade commissions.xlsx; 2022-03-08-POC-Vendor-Crystal-final-Les Services Direct Travel-Trade Commission Claim-USD41473.87.pdf

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**From:** Rene Schneeberger  
**Sent:** Thursday, March 10, 2022 5:44 PM  
**To:** info @Moecker.com <info@moecker.com>  
**Cc:** Lara Lazare (dt.ca) <llazare@dt.ca>; Joel Ostrov (dt.ca) <jostrov@dt.ca>  
**Subject:** Consolidated Main Case No. 22-002742-CA-01 - Crystal Cruises - claim for unpaid trade commissions - USD41,473.87

To whom it may concern:

In accordance with information posted to the <https://crystalcruiseclaims.com/> website, I am submitting a formal claim for unpaid services for our company.

Attached please find the completed claims form as well as supporting attachment (EXCEL) with invoice copies, amounts, and relevant submission details.

Cordially,

**Rene Schneeberger**  
Vice President Leisure Supplier Management, North America  
Direct Travel

Office: 1-201-847-2132 Mobile: 1-510-501-7635

[RSchneeberger@dt.com](mailto:RSchneeberger@dt.com)  
[www.dt.com](http://www.dt.com)

