

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 AND PAYMENT OF FEES OF ASSIGNEE, MARK C.  
HEALY FOR THE PERIOD OF APRIL 1, 2024 THROUGH MAY 19, 2025**

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

Mark C. Healy (“Assignee” or “Applicant”), solely in his capacity as the Assignee for the benefit of creditors of Crystal Cruises LLC, Crystal Holdings U.S. LLC, and Crystal AirCruises LLC (collectively, the “Assignors”), pursuant to Florida Statutes §§ 727.102, 727.109(1), (10) and (15), and § 727.111(4), and the Court’s *Order Granting Assignee’s Motion for Entry of an Order: (1) Approving Noticing Procedures, (2) Approving Proof of Claim Forms; and (3) Extending Deadline to Serve Notice of Assignment* (the “Notice Procedures Order”) entered on March 3, 2022, files this motion (the “Motion”) for approval and payment of fees to the Assignee in the amount of \$1,107,730.75, which represents 10% of the \$11,077,307.54 in receipts during the period of April 1, 2024 through May 19, 2025 (the “Application Period”). In support of the Motion, the Assignee states:

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

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. From April 1, 2024 through May 19, 2025, the Assignee generated \$11,077,307.54 in receipts in connection with the prosecution of claims against third parties and through the

recovery of credit card reserves from creditor card companies and processors, and via other receipts.

4. The Assignee's efforts in the Assignment Cases have been substantial and tremendously successful for the benefit of the assignment estates of the Assignors (the "Assignment Estate"). At the onset of the Assignment Cases, it was unclear if there would be any assets to distribute to creditors. As a result of the efforts of the Assignee, priority consumer and employee creditors have already been paid in excess of \$18 million (representing a priority payment to consumer and employee creditors of the statutory maximum under Fla Stat. §§ 727.14(c)-(e)) and a meaningful distribution in the tens of millions of dollars will be made to general unsecured creditors.

5. During the Application Period, the Assignee recovered in excess of \$11 million, including over \$9 million from American Express in connection with credit card reserves and nearly \$2 million in interest income. The foregoing recovery was obtained following lengthy and complex discussions, negotiations, and reconciliations, and included analyzing thousands of chargeback requests submitted by customers of the Assignor to their credit card companies.

6. During this Application Period, the Assignee spent significant time assembling, analyzing and reviewing documents in connection with the claims filed by the liquidators of the Assignors' parent company, Genting Hong Kong ("Genting"), and certain of its subsidiaries, in an amount in excess of \$1 billion, as well as in the preparation of the Assignee's *Omnibus Objection to Claims of Genting Hong Kong Limited and Certain of Its Subsidiaries* [DE 805] (the "Objection") and the prosecution of the Objection, including voluminous discovery.

7. Additionally, the Assignee has continued his focused efforts on claims reconciliation, which has included the analysis and prosecution of over 5,000 claims objections,

reducing the aggregate claims body in this case by hundreds of millions of dollars, such that pro rata distributions to general unsecured creditors will be increased.

8. The Assignee has also performed many other necessary services for the benefit of the Assignment Estates including, without limitation:

(a) attending meetings and conferences with representatives of credit card companies related to various issues;

(b) conducting discussions with Assignee's counsel regarding a wide array of case related matters;

(c) reviewing invoices, making disbursements, and reconciling bank accounts;

(d) communicating with creditors and the Assignee's team to discuss the status of these Assignment Cases and various related matters; and

(e) assisted in preparing motions for approval of payment of the fees of the Assignee and his professionals.

9. The foregoing list represents only a selection of the activities performed by the Assignee in these cases for the benefit of the Assignment Estates.

10. As of May 19, 2025, the cash balance in the Assignment Estate is \$67,274,202.18 (the "Estate Funds").

11. The Applicant requests an award of fees in the amount of \$1,107,730.75, which represents 10% of the \$11,077,307.54 in receipts for the period of April 1, 2024 through May 19, 2025. Attached hereto as **Exhibit "A"** is the Assignee's *Fourth Interim Report for the Period April 1, 2024 to May 19, 2025*, which provides a breakdown of the estate's total receipts of \$11,077,307.54 from April 1, 2024 through May 19, 2025.

12. Florida Statute § 727.109(10) provides the Court authority to “[a]pprove reasonable fees and the reimbursement of expenses for the assignee and all professional persons retained by the assignee. . .”

13. The usual, customary, and appropriate rate of compensation for an assignee in an Assignment for the Benefit of Creditors proceeding is 10% of the estate’s receipts. This Court previously approved compensation for the Assignee calculated as 10% of the estate’s receipts. *See* D.E. 191, 427, and 753. Accordingly, the requested fee is customary, reasonable, and appropriate based upon the circumstances of these Assignment Cases and the results obtained by the Assignee.

**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 \$1,107,730.75, representing 10% of the total receipts for the period of April 1, 2024 through May 19, 2025; (iii) authorizing the payment to the Assignee of **\$1,107,730.75**, representing the fees requested herein; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: May 22, 2025

BERGER SINGERMAN LLP  
*Co-Counsel for Assignee*  
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By: /s/ 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 May 22, 2025 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](mailto:alosey@losey.law); via email to [cbl44@jud11.flcourts.org](mailto:cbl44@jud11.flcourts.org) pursuant to CBL Rule 2.2; and via e-mail to all creditors and interested parties on the e-mail service list pursuant to the Notice Procedures Order.

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

**Crystal Cruises LLC**  
**Case No.:2022-002742-CA-01**  
**Fourth Interim Report for the Period Ending**  
**April 1, 2024 to May 19, 2025**

**Receipts**

Interest Income	\$ 1,983,214.95
Auction Proceeds	\$ 3.00
Refunds	\$ -
Recovery of CC Reserves	\$ 9,094,089.59
<b>Total Receipts</b>	<b>\$ 11,077,307.54</b>

**Disbursements**

Records & Data Management	\$ 55,812.59
Bank fees	\$ 16,200.00
Computer/Technology Service	\$ 171,884.40
Contract Labor	\$ 193,761.45
FedEx & Delivery	\$ 389.05
Legal Fees	\$ 1,046,431.03
Legal Costs	\$ 11,001.22
Assignee Fees	\$ 5,472,295.05
Office Expense	\$ 35.30
Postage, Photocopies, Fax	\$ 1,819.50
Surety Bond	\$ 30,500.00
Travel Expense	\$ 663.52
Priority Consumer Claims	\$ 2,595,454.96
Priority Wage Claims	\$ 106.56
Payment to Genting from Lease Settlement	\$ 1,162,983.06
Settlement with Hellman	\$ 25,000.00
<b>Total Disbursements</b>	<b>\$ 10,784,337.69</b>

<b>Net Recovery for Period</b>	<b>\$ 292,969.85</b>
<b>Beginning Balance</b>	<b>\$ 66,981,232.33 *</b>
<b>Cash Balance Ending 5-19-25</b>	<b>\$ 67,274,202.18</b>

\* Prior Cash Balance was lower by \$5,604.89 due to transactions that occurred the day the report was pulled

## EXHIBIT B

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,

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Lead Case

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

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limited liability company, and

Case No. 2022-002758-CA-01

Assignors,  
To:

(Jointly Administered Cases)

MARK C. HEALY,

Assignee.

\_\_\_\_\_ /

**ORDER GRANTING MOTION FOR APPROVAL AND  
PAYMENT OF FEES OF ASSIGNEE, MARK C. HEALY FOR  
THE PERIOD OF APRIL 1, 2024 THROUGH MAY 19, 2025 [DE \_\_\_\_]**

**THIS CAUSE** came before the Court upon the *Motion for Approval and Payment of Fees of Assignee, Mark C. Healy for the Period of April 1, 2024 Through May 19, 2025 [DE \_\_\_\_]* (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 the Assignee seeks approval and payment of fees in the amount of \$1,107,730.75, which represents 10% of the \$11,077,307.54 in receipts during the period of April 1, 2024 through May 19, 2025 (the “Application Period”). The Court, having considered the Motion and the record in this proceeding,

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

**ORDERED** that:

1. The Motion is **GRANTED**.
2. The Assignee is awarded fees in the amount of \$1,107,730.75, which represents 10% of the \$11,077,307.54 in receipts during the Application Period.
3. The Assignee is authorized to pay to the Assignee the sum of \$1,107,730.75, representing the fees awarded to the Assignee herein.
4. In making the foregoing award, the Court finds that the amounts awarded represent reasonable compensation for actual and necessary services rendered by the Assignee for the benefit of the assignment estates.

**DONE AND ORDERED** in Chambers, at Miami-Dade County, Florida on this \_\_\_ day of \_\_\_\_\_, 2025.

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HONORABLE LISA S. WALSH  
Circuit Court Judge

Copies furnished to:

Counsel of record