

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.

**MOTION FOR APPROVAL AND PAYMENT OF FEES AND REIMBURSEMENT OF  
EXPENSES INCURRED BY ASTREA CVBA AS SPECIAL COUNSEL TO THE  
ASSIGNEE FOR THE PERIOD OF MAY 1, 2025 THROUGH AUGUST 31, 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 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.

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 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 €13,913.26 and reimbursement of expenses in the amount of €1,217.02 for a total award of €15,130.28 incurred by Astrea CVBA in connection with its representation of the Assignee during the period of May 1, 2025 through August 31, 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”). On March 3, 2022, the Court entered orders in each of the Assignment Cases consolidating and jointly administering the Assignment Cases for procedural purposes.

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 Assignee retained Astrea CVBA as his special counsel to perform necessary legal services in connection with the Assignee's substitution in place of the Assignor, as party plaintiff in a claim of the Assignor that was pending before the Belgian maritime court at the time of the Assignment (the "Belgium Claim").

4. On May 16, 2022, the Court entered an order approving the employment of Astrea CVBA as special counsel to the Assignee.

5. During the Application Period Astrea CVBA, as special counsel to the Assignee, has continued its prosecution of the Belgium Claim, which matter remains pending in the Belgium Maritime Court.

6. As of October 7, 2025, the cash balance in the estates is \$65,998,185.15 (the "Estate Funds").

7. During the Application Period Astrea CVBA has incurred fees in the amount of €13.913,26 for legal services provided to the Assignee during the Application Period and expenses in the amount of €1.217,02 in the nature of office expenses and disbursements. Applicant's invoices are attached hereto as **Exhibit "A"**.

8. The Assignee respectfully requests that the Court approve this Motion and allow Astrea CVBA an interim award of fees in the amount of €13.913,26, and reimbursement of expenses in the amount of €1.217,02, for a total of €15,130.28 for the period of May 1, 2025 through August 31, 2025, with proper adjustment for the pending foreign exchange rate upon payment.

9. There will be no prejudice to any party in respect of the requested interim award and distribution as it is being made for the purpose of administering, and the benefit of, the Assignment Estate, and the fees sought to be paid by the Assignee will be subject to final review and objection at the end of this case.

**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 Assignee’s request for €13,913,26 in compensation for services rendered by Astrea CVBA, and reimbursement of expenses incurred by Astrea CVBA in the amount of €1,217,02, for a total award of €15,130.28, (iii) authorizing the Assignee to pay Astrea CVBA €15,130.28, with proper adjustment for the pending foreign exchange rate; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: October 7, 2025

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 a true and correct copy of the foregoing was served via the Florida Court's e-Filing Portal on October 7, 2025 to all parties that have entered an appearance in this case; via email to 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/ Paul N. Mascia  
Paul N. Mascia

**EXHIBIT A**  
**(Invoices)**

**Michael Moecker & Associates Inc.**  
**f.a.o. Paul Mascia**  
**1883 Marina Mile Blvd., Suite 106**  
**FL 33315 Fort Lauderdale - Florida**  
**United States of America**

BY MAIL: pmascia@nardellalaw.com

Verzonden op 16 juni 2025

Onze referte : 18-01045-CMM\MVL\MVL-  
 Uw referte : -  
 Factuur nr. : 2572074  
 Factuurdatum : 31/05/2025

**BETREFT : MV. CRYSTA [REDACTED] MATTANZA (COLLISION)**

Staat van erelonen en kosten voor juridische werkzaamheden tot en met 31/05/2025:

	Excl BTW	BTW	Totaal
Erelonen	€ 4.874,97	€ 0,00	€ 4.874,97
Administratieve kosten	€ 390,00	€ 0,00	€ 390,00
	€ 5.264,97	€ 0,00	<b>€ 5.264,97</b>

VAT 0 %

VAT exempt - article 44 Directive 2006/112/EC

Wij verzoeken u vriendelijk het bedrag van **€ 5.264,97** te storten op rekeningnummer **[REDACTED]** onder vermelding van **[REDACTED]**  
**+++202/7572/07486+++**

**Onze ereloonstaten zijn betaalbaar uiterlijk 7 dagen na ontvangst.**  
 BTW nummer: 0885.184.584

Onze algemene voorwaarden zijn beschikbaar op [www.astrealaw.be](http://www.astrealaw.be) en kunnen op verzoek gratis naar u verzonden worden.  
 Voor alle verdere inlichtingen kan u terecht via: [accounting@astrealaw.be](mailto:accounting@astrealaw.be)  
 Correspondentieadres: Antwerpen

**COPY OF THE INVOICE TRANSLATED IN YOUR LANGUAGE**

**Michael Moecker & Associates Inc.**  
**f.a.o. Paul Mascia**  
**1883 Marina Mile Blvd., Suite 106**  
**FL 33315 Fort Lauderdale - Florida**  
**United States of America**

BY MAIL: pmascia@nardellalaw.com

Sent on 16th of June 2025

Our reference : 18-01045-CMM\MVL\MVL-  
 Your reference : -  
 Invoice n° : 2572074  
 Invoice date : 31/05/2025

**RE : MV. CRYST [REDACTED] MATTANZA (COLLISION)**

Statement of professional charges rendered up to 31/05/2025:

	Excl VAT	VAT	Total
Fees	€ 4.874,97	€ 0,00	€ 4.874,97
Office expenses	€ 390,00	€ 0,00	€ 390,00
	€ 5.264,97	€ 0,00	<b>€ 5.264,97</b>

VAT 0 %  
 VAT exempt - article 44 Directive 2006/112/EC

May we kindly ask you to transfer the above amount into our account with number **IBAN: [REDACTED]**  
**[REDACTED] the following reference:**  
**+++202/7572/07486+++**

**Our invoices are payable within 7 days after receipt.**  
 VATnumber: 0885.184.584

Our general terms and conditions are available on [www.astrealaw.be](http://www.astrealaw.be). A hard copy will be sent to you (free of charge) upon request. For any further information you may require, please feel free to contact us via [accounting@astrealaw.be](mailto:accounting@astrealaw.be).  
 Correspondence address: Antwerpen

## FEES

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Date	Comment
03/04/2025	E-mail to opponent
04/04/2025	Mail to colleague
10/04/2025	Telcon counsel for La Mattanza
10/04/2025	Email to Ulrich Krämer
10/04/2025	Email to Paul Mascia
10/04/2025	Follow-up correspondence re continuation of proceedings
11/04/2025	Follow-up
15/04/2025	Draft e-mails to clients
16/04/2025	Mail to client re [REDACTED]
23/04/2025	Follow up correspondence
30/04/2025	First analysis submissions La Mattanza
02/05/2025	Follow-up submissions La Mattanza; status hearing 08/05
04/05/2025	Preparation hearing 08/05
06/05/2025	Review final submissions; email
06/05/2025	Translation submissions + draft e-mail to clients
07/05/2025	Preparation oral hearing
07/05/2025	Preparation hearing 08/05 with Marc Van Looveren
07/05/2025	Preparation hearing 08/05
07/05/2025	Mail to client re [REDACTED]
07/05/2025	Mail to client re [REDACTED]
08/05/2025	Preparation hearing; hearing of Bruges enterprise court
09/05/2025	Adjustments to overview of Nautical Commission documents
09/05/2025	Discussion Marc Van Looveren; draft e-mail to opponent re file court surveyor
09/05/2025	Correspondence with/from opponent
15/05/2025	Dossier court surveyor; draft e-mail to La Mattanza's counsel
31/05/2025	Follow-up court surveyor's report

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Michael Moecker & Associates Inc.**  
f.a.o. Paul Mascia  
1883 Marina Mile Blvd., Suite 106  
FL 33315 Fort Lauderdale - Florida  
United States of America

BY MAIL: pmascia@nardellalaw.com

14 augustus 2025

Onze referte : 18-01045-CMM/MVE/MVE  
Uw referte : -  
Factuur nr. : 2573002  
Factuurdatum : 31/07/2025

**BETREFT : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Staat van erelonen en kosten voor juridische werkzaamheden tot en met 31/07/2025 :

	Excl BTW	BTW	Totaal
Erelonen	€ 7.975,37	€ 0,00	€ 7.975,37
Administratieve kosten	€ 638,03	€ 0,00	€ 638,03
Doorbelaste kosten	€ 103,96	€ 0,00	€ 103,96
	€ 8.717,36	€ 0,00	<b>€ 8.717,36</b>

VAT 0 %

VAT exempt - article 44 Directive 2006/112/EC

Wij verzoeken u vriendelijk te zijn om te betalen op rekeningnummer **IBAN: [REDACTED]** - **BIC: [REDACTED]** onder vermelding van **202/7573/00244**

**Onze ereloonstaten zijn betaalbaar uiterlijk 7 dagen na ontvangst.**  
BTW nu [REDACTED]

Onze algemene voorwaarden zijn beschikbaar op [www.astrealaw.be](http://www.astrealaw.be) en kunnen op verzoek gratis naar u verzonden worden.

Voor alle verdere inlichtingen kan u terecht via: [accounting@astrealaw.be](mailto:accounting@astrealaw.be)

Correspondentieadres: Antwerpen

**COPY OF THE INVOICE TRANSLATED IN YOUR LANGUAGE**

**Michael Moecker & Associates Inc.  
f.a.o. Paul Mascia  
1883 Marina Mile Blvd., Suite 106  
FL 33315 Fort Lauderdale - Florida  
United States of America**

BY MAIL: pmascia@nardellalaw.com

14th of August 2025

Our reference : 18-01045-C [REDACTED]  
Your reference : -  
Invoice n° : 2573002  
Invoice date : 31/07/2025

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to :

	Excl VAT	VAT	Total
Fees	€ 7.975,37	€ 0,00	€ 7.975,37
Office expenses	€ 638,03	€ 0,00	€ 638,03
Disbursements	€ 103,96	€ 0,00	€ 103,96
	[REDACTED]	€ 0,00	[REDACTED],36

May we kindly ask you to transfer the above amount into our account with number  
**IBAN:** [REDACTED] - **BIC:** [REDACTED] *mentioning the following reference: 202/7573/00244*

**Our invoices are payable within 7 days after receipt.**  
VATnumber: 0885.184.584

Our general terms and conditions are available on [www.astrealaw.be](http://www.astrealaw.be). A hard copy will be sent to you (free of charge) upon request. For any further information you may require, please feel free to contact us via [accounting@astrealaw.be](mailto:accounting@astrealaw.be).  
Correspondence address: Antwerpen

## FEES

Date	Comment
03/06/2025	Correspondence [REDACTED]
06/06/2025	Internal meeting regarding court surveyor's report and its annexes; telcon Antwerp court chancery
06/06/2025	Alteration of inventory
06/06/2025	Review exhibits to be filed in court
06/06/2025	Mail to colleague
10/06/2025	Telcon court re court surveyor's file
10/06/2025	Telcon court register; e-mail to opponent
11/06/2025	Review letter to court; check strategy with Ruud
11/06/2025	Draft letter to the court + internal discussions
11/06/2025	Telcon court; discussion Marc; letter to court re court surveyor's dossier
11/06/2025	Filing letter to the court
11/06/2025	E-mail opposing counsel
12/06/2025	Discussion re approach
12/06/2025	Telcon Nautical Commission; telcon opponent; e-mail Nautical Commission and internal discussion next steps
12/06/2025	Reviewing expert report documents
13/06/2025	Follow-up court surveyor file
13/06/2025	compare expertise studies communicated and filed + format email
13/06/2025	Email concerning expert reports
16/06/2025	Follow-up deposited file
17/06/2025	Follow-up court surveyor's report; instructions Sam
18/06/2025	Internal discussion
18/06/2025	Analysis of documents
18/06/2025	Check whether submitted file was complete
19/06/2025	Instructions
20/06/2025	E-mail opponent
20/06/2025	E-mail to clients [REDACTED]
20/06/2025	Email re missing exhibits
23/06/2025	Correspondence opponent; court; instructions Gorik
23/06/2025	E-mail to opponent
23/06/2025	Preparation final exhibits
24/06/2025	Check final exhibits + call with court clerk
24/06/2025	Follow-up court surveyor's file; instructions for filing; letter to court
24/06/2025	Check exhibits after discovery mistake in the date of exhibits by court expert + adaptation letter to the court
24/06/2025	Internal discussion
24/06/2025	Filing letter to the court + internal discussion
24/06/2025	E-mail to opponent
25/06/2025	E-mail to opponent
25/06/2025	Preparation hearing 26/06 with Marc
25/06/2025	Briefing re upcoming hearing
25/06/2025	Briefing
26/06/2025	Preparation hearing; hearing of Bruges Commercial Court re court surveyor file
26/06/2025	E-mail to opponent
26/06/2025	E-mail Paul Mascia and Mark Healy; e-mail Ulrich
26/06/2025	Draft e-mail to Ullrich Kramer
26/06/2025	E-mail to Ullrich Krämer
23/07/2025	Telcon court register
28/07/2025	E-mail to Paul Mascia
30/07/2025	Review update of case file and internal memo
31/07/2025	Study judgement of the commercial court (35p)
31/07/2025	Internal debrief following incoming judgement
31/07/2025	Reading judgment; internal instructions
31/07/2025	Discussion judgment and next steps
31/07/2025	Analysis and translation judgement + draft e-mail to clients

## DISBURSEMENTS

Date	Comment	VAT %	Amount
26/06/2025	Travel expenses - Bruges	0%	€ 103,96
	<b>Total</b>		<b>€ 103,96</b>

[REDACTED]

[REDACTED]

**Michael Moecker & Associates Inc.**  
f.a.o. Paul Mascia  
1883 Marina Mile Blvd., Suite 106  
FL 33315 Fort Lauderdale - Florida  
United States of America

BY MAIL: pmascia@nardellalaw.com

15 september 2025

Onze referte : 18-01045-CMM/MVE/MVE  
Uw referte : -  
Factuur nr. : 2573436  
Factuurdatum : 31/08/2025

**BETREFT : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Staat van erelonen en kosten administratieve werkzaamheden tot en met  
31/08/2025 :

	Excl BTW	BTW	Totaal
Erelonen	€ 1.062,92	€ 0,00	€ 1.062,92
Administratieve kosten	€ 85,03	€ 0,00	€ 85,03
	€ 1.147,95	€ 0,00	<b>€ 1.147,95</b>

VAT 0 %

VAT exempt - article 44 Directive 2006/112/EC

Wij verzoeken u vriendelijk het bedrag van **€ 1.147,95** te storten op  
rekeningnummer **IBAN:** [redacted] - **BIC:** [redacted] onder  
vermelding van **202/7** [redacted]

[redacted] e [redacted] lij [redacted] a ontvangst.  
BTW nummer: 0885.184.584

Onze algemene voorwaarden zijn beschikbaar op [www.astrealaw.be](http://www.astrealaw.be) en  
kunnen op verzoek gratis naar u verzonden worden.

Voor alle verdere inlichtingen kan u terecht via: [accounting@astrealaw.be](mailto:accounting@astrealaw.be)

Correspondentieadres: Antwerpen

**COPY OF THE INVOICE TRANSLATED IN YOUR LANGUAGE**

**Michael Moecker & Associates Inc.  
f.a.o. Paul Mascia  
1883 Marina Mile Blvd., Suite 106  
FL 33315 Fort Lauderdale - Florida  
United States of America**

BY MAIL: pmascia@nardellalaw.com

15th of September 2025

Our reference : 18-01045-CMM  
Your reference : -  
Invoice n° : 2573436  
Invoice date : 31/08/2025

**RE : MV. CRYSTAL BACH / LA MATTANZA (COLLISION)**

Statement of professional charges rendered up to :

	Excl VAT	VAT	Total
Fees	€ 1.062,92	€ 0,00	€ 1.062,92
Office expenses	€ 85,03	€ 0,00	€ 85,03
	€ 1.147,95	€ 0,00	<b>€ 1.147,95</b>

May we kindly ask you to transfer the above amount into our account with number [redacted] : [redacted] : [redacted] *mentioning the following reference: 202/7573/43690*

**Our invoices are payable within 7 days after receipt.**  
VATnumber: 0885.184.584

Our general terms and conditions are available on [www.astrealaw.be](http://www.astrealaw.be). A hard copy will be sent to you (free of charge) upon request. For any further information you may require, please feel free to contact us via [accounting@astrealaw.be](mailto:accounting@astrealaw.be).  
Correspondence address: Antwerpen

## FEES

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Date	Comment
01/08/2025	Review email to clients [REDACTED]
01/08/2025	Email regarding judgement
07/08/2025	E-mail to client
07/08/2025	Email to Ulrich: feedback re judgement
07/08/2025	Review email to Paul re service and deadlines to appeal
11/08/2025	Correspondence
14/08/2025	Follow-up re e-mail to opponent after judgment
18/08/2025	Mail to colleague containing detailed statement of account following judgment
18/08/2025	Mail to colleague

[REDACTED]

**EXHIBIT B**

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.

**ORDER GRANTING MOTION FOR APPROVAL AND PAYMENT  
OF FEES AND REIMBURSEMENT OF EXPENSES INCURRED  
BY ASTREA CVBA AS SPECIAL COUNSEL TO THE ASSIGNEE  
FOR THE PERIOD OF MAY 1, 2025 THROUGH AUGUST 31, 2025**

**THIS CAUSE** came before the Court upon the *Motion for Approval and Payment of Fees and Reimbursement of Expenses Incurred by Astrea CVBA as Special Counsel to the Assignee for the Period of May 1, 2025 through August 31, 2025* (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 Astrea CVBA seeks compensation in the amount of €13.913,26 and reimbursement of expenses in the amount of €1.217,02, for a total award of €15.130,28, for the period of May 1, 2025 through August 31, 2025, with proper adjustment for the pending foreign exchange rate. 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. Astrea CVBA, as special counsel to the Assignee, is awarded fees in the amount of €13,913.26 and expenses in the amount of €1,217.02, for a total award of €15,130.28, which represents 100% of the fees and expenses requested in the Motion.
3. The Assignee is authorized to pay to Astrea CVBA the sum of €15,130.28, which is the balance owed, with proper adjustment for the pending foreign exchange rate.
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 Astrea CVBA for the benefit of the assignment estate.

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

---

HONORABLE LISA WALSH  
Circuit Court Judge

Copies furnished to:

Counsel of record