

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 MAY 20, 2025 THROUGH MAY 19, 2026**

**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* [DIN 42] (the “Notice Procedures Order”), files this motion (the “Motion”) for approval and payment of fees to the Assignee in the amount of \$870,396.23, which represents 10% of the \$8,703,962.35 in compensable receipts during the period of May 20, 2025 through May 19, 2026 (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 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”).

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 May 20, 2025 through May 19, 2026, the Assignee generated \$8,703,962.35 in compensable receipts in connection with the prosecution and settlement of claims against third parties, the recovery of unclaimed funds, and via other receipts.¹

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 approximately \$19 million (representing a priority payment to consumer and employee creditors of the statutory maximum under Fla Stat. §§ 727.14(c)-(e)). Additionally, contemporaneously with the filing of the instant Motion, the Assignee is filing a motion for authorization to make an interim distribution to all allowed general unsecured creditors in the aggregate amount of approximately \$39.5 million, which interim distribution will result in allowed general unsecured creditors collecting approximately 30% of their allowed claim amounts (excluding any priority distribution already paid to such claimant and excluding any future final distribution).

5. During the Application Period, the Assignee recovered \$8,703,962.35 in compensable receipts, including a total of \$6,887,000 from Crystal Mozart Limited ("CML") and Crystal Brand Company Limited ("CBL"), which are non-claimant foreign affiliates of Genting Hong Kong Limited based in Malta and the Isle of Man, respectfully; \$378,026.63 in connection with the class action proceedings pending against Visa and Mastercard in the U.S. District Court for the Eastern District of New York styled *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litig.*; and \$1,416,458.84 in interest income.

¹ The Assignee also recovered a \$34,425.00 refunded retainer and \$37,035.40 in returned wire payments to creditors, which receipts are not included in the calculation of the Assignee's fee.

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, and in the prosecution of the Assignee's *Omnibus Objection to Claims of Genting Hong Kong Limited and Certain of Its Subsidiaries* [DE 805] (the "Objection"), including voluminous discovery, depositions, expert matters, motion practice, and trial preparation. On April 8, 2026, the Court approved the settlement with Genting (the "Genting Settlement"), including the recoveries from non-claimant foreign affiliates CML and CBL. *See Order Granting Assignee's Motion to Approve Settlement with Genting Hong Kong Limited, Crystal Acquisition Company Limited, Star Cruises (HK) Limited, Crystal International (Asia) Limited, and Star Cruise Pte Ltd* [DIN 956]. The Genting Settlement reflected a reduction of nearly \$1 billion from the Genting Claimants' original claim amount of \$1.068 billion. As a result, the proofs of claim submitted by the Genting Claimants have been fully resolved and no further obligations exist between the Estate and the Genting Claimants in connection therewith.

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

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

(f) Interfacing with claims purchasers and performing related reconciliations and analyses.

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, 2026, the cash balance in the Estate is \$46,271,315.05 (the “Estate Funds”).

11. The Applicant requests an award of fees in the amount of \$870,396.23, which represents 10% of the \$8,703,962.35 in compensable receipts for the period of May 20, 2025 through May 19, 2026. Attached hereto as **Exhibit “A”** is the Assignee’s *Fifth Interim Report for the Period May 20, 2025 to May 19, 2026*, which provides a breakdown of the estate’s total receipts from May 20, 2025 through May 19, 2026.

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, 753 and 864. 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 \$870,396.23, representing 10% of the total compensable receipts for the period of May 20, 2025 through May 19, 2026; (iii) authorizing the payment to the Assignee of \$870,396.23, representing the fees requested herein; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: May 21, 2026

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 21, 2026 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; 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/ Samuel J. Capuano
Samuel J. Capuano

EXHIBIT A
(Fifth Interim Report)

Crystal Cruises LLC
Case No.:2022-002742-CA-01
Fifth Interim Report for the Period Ending
May 20, 2025 to May 19, 2026

Receipts

Interest Income	\$	1,416,458.84
Refunded Retainer	\$	34,425.00
Returned Wires	\$	37,035.40
Refunds	\$	22,086.88
Settlements	\$	<u>7,265,416.63</u>

Total Receipts **\$ 8,775,422.75**

Disbursements

Records & Data Management	\$	40,708.93
Bank fees	\$	1,500.00
Computer/Technology Service	\$	50,552.05
Contract Labor	\$	39,807.50
FedEx & Delivery	\$	187.20
Legal Fees	\$	1,982,621.15
Legal Costs	\$	16,452.00
Assignee Fees	\$	1,107,730.75
Professional Fees	\$	172,142.17
Postage, Photocopies, Fax	\$	1,617.33
Surety Bond	\$	30,500.00
Travel Expense	\$	-
Priority Consumer Claims	\$	334,490.40
Priority Wage Claims	\$	-
Settlement with Genting	\$	<u>26,000,000.00</u>

Total Disbursements **\$ 29,778,309.48**

Net Recovery for Period **\$ (21,002,886.73)**
Beginning Balance **\$ 67,274,201.78**
Cash Balance Ending 5-19-26 **\$ 46,271,315.05**

EXHIBIT B
(Proposed form of Order)

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.

_____ /

**ORDER GRANTING MOTION FOR APPROVAL AND
PAYMENT OF FEES OF ASSIGNEE, MARK C. HEALY FOR
THE PERIOD OF MAY 20, 2025 THROUGH MAY 19, 2026 [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 May 20, 2025 Through May 19, 2026 [DE ____]* (the “Motion”), filed on negative notice by Mark C. Healy (the “Assignee”) on May 21, 2026, 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 \$870,396.23, which represents 10% of the \$8,703,962.35 in compensable receipts during the period of May 20, 2025 through May 19, 2026 (the “Application Period”). The Court, having reviewed and considered the Motion and the record in this case, noting that no objection to the Motion was filed by any party, finding that

notice of the Motion was sufficient and properly served on interested parties as required by Fla. Stat. § 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* [DIN 42], and otherwise finding that good and sufficient cause exists for granting the relief set forth herein, it is hereby

ORDERED that:

1. The Motion is **GRANTED**.
2. The Assignee is awarded fees in the amount of \$870,396.23, which represents 10% of the \$8,703,962.35 in receipts during the Application Period.
3. The Assignee is authorized to pay to the Assignee the sum of \$870,396.23, 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 _____, 2026.

HONORABLE LISA S. WALSH
Circuit Court Judge

Copies furnished to:

Counsel of record