

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

LEISURE INVESTMENTS HOLDINGS LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Joint Administration Requested)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) CONFIRMING,
RESTATING, AND ENFORCING THE WORLDWIDE AUTOMATIC STAY, ANTI-
DISCRIMINATION PROVISIONS, AND *IPSO FACTO* PROTECTIONS OF THE
BANKRUPTCY CODE, (II) APPROVING THE FORM AND MANNER OF
NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF**

Leisure Investments Holdings LLC and certain of its affiliates (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (collectively, the “**Chapter 11 Cases**”) hereby file this motion (this “**Motion**”) for entry of an order, substantially in the form of Exhibit A hereto (the “**Proposed Order**”), (i) confirming, restating, and enforcing the worldwide automatic stay, anti-discrimination provisions, and *ipso facto* protections of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”); (ii) approving the form and manner of notice related thereto, substantially in the form attached as Exhibit 1 to Exhibit A hereto (the “**Notice**”); and (iii) granting related relief. In support of this Motion, the Debtors rely upon and incorporate by reference the *Declaration of Steven Robert Strom in Support of the Debtors' Chapter 11*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are as follows: Leisure Investments Holdings LLC (7260); Triton Investments Holdings LLC (6416); MS Leisure Company (7257); Icarus Investments Holdings LLC (2636); Ejecutivos de Turismo Sustentable S.A. de C.V. (5CA4); Dolphin Capital Company, S. de R.L. de C.V. (21H8); Dolphin Leisure, Inc. (7073); Dolphin Austral Holdings, S.A. de C.V. (6A13); Aqua Tours, S.A. de C.V. (6586); Viajero Cibernético, S.A. de C.V. (1CZ7); Promotora Garrafón, S.A. de C.V. (0KA2); Marineland Leisure, Inc. (7388); GWMP, LLC (N/A); Gulf World Marine Park, Inc. (0348); and The Dolphin Connection, Inc. (0322). For the purposes of these chapter 11 cases, the address for the Debtors is Leisure Investments Holdings LLC, c/o Riveron Management Services, LLC, 600 Brickell Avenue, Suite 2550, Miami, FL 33131.



Petitions and First Day Pleadings (the “**First Day Declaration**”).² In further support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2) and, pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. The statutory and legal predicates for the relief requested herein are sections 105(a), 362, 365(e)(1), 525, and 541 of the Bankruptcy Code and rules 6003 and 6004 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”).

BACKGROUND

4. On March 31, 2025, each of the Debtors filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the First Day Declaration.

5. No statutory committee of unsecured creditors has been appointed by the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) and no trustee or examiner has been appointed in the Chapter 11 Cases.

6. Additional information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the commencement of the Chapter 11 Cases, is set forth in detail in the First Day Declaration.

RELIEF REQUESTED

7. By this Motion, the Debtors request entry of the Proposed Order, (a) enforcing and restating the worldwide automatic stay, *ipso facto*, and antidiscrimination provisions under the Bankruptcy Code; (b) approving the form and manner of the Notice; and (c) granting certain related relief. The Debtors further seek authority to translate this Motion, the Order, and the Notice, if necessary, to better inform creditors, governmental units, and interested parties of the relief requested herein.

BASIS FOR RELIEF REQUESTED

8. As a result of the Debtors’ international business operations, the Debtors have many foreign creditors, contract counterparties, and other parties-in-interest in countries who may not be well versed in the protections and restrictions of the Bankruptcy Code. Some of these creditors and parties-in-interest do not transact business on a regular basis with companies that have filed for chapter 11. These creditors and parties-in-interest may be unfamiliar with the operation of the worldwide automatic stay and provisions of the Bankruptcy Code. Upon the commencement of the Chapter 11 Cases, non-U.S. counterparties to certain leases and executory contracts could attempt to terminate such leases or contracts, including pursuant to *ipso facto* provisions in contravention of sections 362 and 365 of the Bankruptcy Code. Similarly, governmental units

outside of the United States may, in violation of section 525 of the Bankruptcy Code, deny, suspend, terminate, or otherwise place conditions on certain licenses, permits, charters, franchises, or other similar grants held by a Debtor that is required for the Debtors' ongoing business operations. Accordingly, the Debtors submit that such circumstances warrant an order apprising all parties—especially non-U.S. governmental units, creditors, and vendors—of sections 362, 365(e)(1), 525, and 541 of the Bankruptcy Code and the protections provided thereby.

9. The filing of the Chapter 11 Cases triggered a worldwide automatic stay under section 362 of the Bankruptcy Code that enjoins all persons and all governmental units from, among other things: (a) commencing or continuing a judicial, administrative, or other proceeding against any of the Debtors that was or could have been commenced before the Chapter 11 Cases were filed or recovering upon a claim against any of the Debtors that arose before the commencement of the Chapter 11 Cases; or (b) taking any action to collect, assess, or recover a claim against any of the Debtors that arose before the commencement of the Chapter 11 Cases. *See* 11 U.S.C. § 362.

10. Section 365(e)(1) of the Bankruptcy Code prohibits, subject to certain limited exceptions, all parties to executory or unexpired leases with the Debtors from, among other things, terminating or modifying any such contract or lease, or any right or obligation under such contract or lease, at any time after the commencement of the Chapter 11 Cases solely because of a provision in such contract or lease that is conditioned on: (a) the insolvency or financial condition of the Debtors at any time before the closing of the Chapter 11 Cases; (b) the commencement of the Chapter 11 Cases; or (c) the appointment of a trustee. *See* 11 U.S.C. § 365(e)(1).

11. Similarly, provisions in agreements, transfer instruments, or applicable non-bankruptcy law are unenforceable if any such provision “restricts or conditions transfer of such interest by the debtor” or:

is conditioned on the insolvency or financial condition of the debtor, on the commencement of a case under this title, or on the appointment of or taking possession by a trustee in a case under this title or a custodian before such commencement, and that effects or gives an option to effect a forfeiture, modification, or termination of the debtor’s interest in property.

12. Section 525 of the Bankruptcy Code prohibits and enjoins governmental units, with certain limited exceptions not applicable to the Chapter 11 Cases, from, among other things, denying, revoking, suspending, or refusing to renew any license, permit, charter, franchise, or other similar grant to, condition such a grant on, or discriminate with respect to such a grant against, the Debtors solely because the Debtors: (a) are debtors under the Bankruptcy Code; (b) may have been insolvent before the commencement of the Chapter 11 Cases; or (c) may be insolvent during the pendency of the Chapter 11 Cases. *See* 11 U.S.C. § 525.

13. The protections contained in sections 362, 365(e)(1), 525, and 541 of the Bankruptcy Code are self-executing. They constitute fundamental debtor protections that provide the Debtors with the “breathing spell” necessary to enable a smooth and orderly transition into chapter 11. *See, e.g., McCartney v. Integra Nat. Bank North*, 106 F.3d 506, 509 (3d Cir. 1997) (citing *Mar. Elec. Co., Inc. v. United Jersey Bank*, 959 F.2d 1194, 1204 (3d Cir. 1991)); *Borman v. Raymark Indus., Inc.*, 946 F.2d 1031, 1033 (3d Cir. 1991) (“The automatic stay was intended to give the debtor ‘a breathing spell from his creditors.’” (internal citation omitted)); *Cuffee v. Atl. Bus. & Cmty. Dev. Corp. (In re Atl. Bus. & Cmty. Corp.)*, 901 F.2d 325, 327 (3d Cir. 1990) (“The automatic stay is one of the fundamental debtor protections provided by the bankruptcy laws. It gives the debtor a breathing spell from his creditors.” (internal citation omitted)); *In re THG*

Holdings LLC, 604 B.R. 154, 160 (Bankr. D. Del. 2019) (“The automatic stay is one of the most fundamental protections provided by the Bankruptcy Code, giving the debtor a breathing spell from its creditors.”).

14. The protections in these provisions extend to protect a debtor’s property and contracts wherever they are located and by whomever held. *See In re Nortel Networks, Inc.*, 669 F.3d 128, 138 (3d Cir. 2011) (“United States courts have uniformly upheld that extraterritorial application of the automatic stay”); *In re NDEP Corp.*, 193 B.R. 710, 712 (Bankr. D. Del. 1995) (stating that section 541 applies to a debtor’s “legal or equitable interests as of the commencement of the case wherever located and by whomever held”).

15. Accordingly, any actions by third parties to modify or terminate contracts or enforce their terms against the Debtors are prohibited absent court approval. *See NLRB v. Bildisco & Bildisco*, 465 U.S. 513, 531 (1984) (a creditor is “precluded . . . from enforcing the contract terms” of an executory contract prior to its assumption by the debtor); *U.S. Postal Serv. v. Dewey Freight Sys., Inc.*, 31 F.3d 620, 624 (8th Cir. 1994) (“After a debtor commences a Chapter 11 proceeding, but before executory contracts are assumed or rejected under § 365(a), those contracts remain in existence, ***enforceable by the debtor but not against the debtor.***”) (emphasis in original).

16. Notwithstanding the fundamental, self-executing, and worldwide nature of these statutory protections, not all parties affected or potentially affected by the commencement of a chapter 11 case may be aware of their existence. Debtors in bankruptcy often must advise third parties of the existence and effect of sections 362, 365(e)(1), 525, and 541 of the Bankruptcy Code. Occasionally, a chapter 11 debtor must initiate adversarial proceedings in the bankruptcy court to enforce these protections. To avoid such unnecessary actions, and to provide notice to parties unfamiliar with the Bankruptcy Code of the scope and effect of the section 362 worldwide

automatic stay, the sections 365(e)(1) and 541(c) prohibition against enforcement of *ipso facto* clauses, and the section 525 antidiscrimination provisions, the Debtors respectfully request entry of the Proposed Order restating those provisions. To that end, the Debtors submit that service of the Notice in appropriate circumstances will advance the efficient administration of the Chapter 11 Cases.

17. The Debtors conduct business with parties in jurisdictions worldwide, many of whom are unfamiliar with the U.S. bankruptcy process and the protections afforded to debtors. In addition, a significant amount of the Debtors' property is located outside of the United States. As a result of this, many counterparties may not be familiar with American bankruptcy law and, absent such an order, may take precipitous action against the Debtors and their property.

18. By restating the safeguards in sections 362, 365(e)(1), 525, and 541 of the Bankruptcy Code, the Proposed Order will help prevent unwitting violations of these crucial provisions. The granting of the relief requested will help ensure that (a) the non-debtor parties to unexpired leases and executory contracts with Debtors will continue to perform and will not unilaterally terminate their contracts; (b) creditors do not seize the Debtors' assets, impose liens, or take any other action in violation of the worldwide automatic stay; and (c) foreign governmental authorities do not deny, revoke, or suspend any licenses or permits solely because the Debtors are in chapter 11. It would also spare the Debtors from the burden of commencing adversarial proceedings to enforce the protections automatically provided by the Bankruptcy Code. Consequently, the Proposed Order will assist the Debtors in effecting an orderly chapter 11 process.

NOTICE

19. Notice of this Motion will be provided to: (a) the U.S. Trustee; (b) the Debtors' 20 largest unsecured creditors (excluding insiders), once identified; (c) the Internal Revenue Service; (d) the United States Attorney's Office for the District of Delaware and all other states in which the Debtors operate; (e) the Office of the Attorney General for the State of Florida; (f) the County Attorney's Office for Miami Dade County and Bay County, Florida; (g) counsel to the Prepetition First Lien Noteholders and DIP Lenders; (h) counsel to the DIP Agent; (i) counsel to Prepetition Second Lien Noteholders; (j) counsel to the Prepetition First Lien Collateral Agent and the Prepetition Second Lien Collateral Agent; and (k) all parties that have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-1(m). In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

[Signature Page Follows]

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order, substantially in the form annexed hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as is just and proper.

Dated: March 31, 2025

/s/ Jared W. Kochenash

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Robert S. Brady (No. 2847)

Sean T. Greecher (No. 4844)

Allison S. Mielke (No. 5934)

Jared W. Kochenash (No. 6557)

Rodney Square

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Email: rbrady@ycst.com

sgreecher@ycst.com

amielke@ycst.com

jkochenash@ycst.com

Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LEISURE INVESTMENTS HOLDINGS LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

Docket Ref. No. ____

**ORDER (I) CONFIRMING, RESTATING, AND ENFORCING THE WORLDWIDE
AUTOMATIC STAY, ANTI-DISCRIMINATION PROVISIONS, AND *IPSO FACTO*
PROTECTIONS OF THE BANKRUPTCY CODE, (II) APPROVING THE FORM
AND MANNER OF NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “**Motion**”)² of the above captioned debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (this “**Order**”), (a) enforcing and restating the worldwide automatic stay, *ipso facto*, and antidiscrimination provisions under the Bankruptcy Code, (b) approving the Notice, and (c) granting certain related relief, all as more fully described in the Motion; and the Court having jurisdiction to consider the matters raised in the Motion pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having authority to hear the matters raised in the Motion pursuant to 28 U.S.C. § 157; and the Court having venue pursuant to 28 U.S.C. §§ 1408 and 1409; and consideration of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Leisure Investments Holdings LLC (7260); Triton Investments Holdings LLC (6416); MS Leisure Company (7257); Icarus Investments Holdings LLC (2636); Ejecutivos de Turismo Sustentable S.A. de C.V. (5CA4); Dolphin Capital Company, S. de R.L. de C.V. (21H8); Dolphin Leisure, Inc. (7073); Dolphin Austral Holdings, S.A. de C.V. (6A13); Aqua Tours, S.A. de C.V. (6586); Viajero Cibernético, S.A. de C.V. (1CZ7); Promotora Garrafón, S.A. de C.V. (0KA2); Marineland Leisure, Inc. (7388); GWMP, LLC (N/A); Gulf World Marine Park, Inc. (0348); and The Dolphin Connection, Inc. (0322). For the purposes of these chapter 11 cases, the address for the Debtors is Leisure Investments Holdings LLC, c/o Riveron Management Services, LLC, 600 Brickell Avenue, Suite 2550, Miami, FL 33131.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

the Motion and the requested relief being a core proceeding that the Court can determine pursuant to 28 U.S.C. § 157(b)(2); and due and sufficient notice of the Motion having been given under the circumstances, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Motion and the First Day Declaration; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors and their estates; and upon the record herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to, and to the extent set forth in, section 362 of the Bankruptcy Code, the commencement of the Chapter 11 Cases operates as a stay, applicable to all persons (including individuals, partnerships, corporations, and all those acting for or on their behalf) and all governmental units (whether of the United States, any state or locality therein, any territory or possession thereof, or any non-U.S. jurisdiction, including any division, department, agency, instrumentality, or service thereof, and all those acting for or on their behalf) of the following:
 - (a) commencing or continuing any judicial, administrative, or other action or proceeding (including but not limited to any bankruptcy, liquidation, suspension of payments, the issuance or enforcement of process or any and all other similar proceedings) against the Debtors that was or could have been initiated before the Chapter 11 Cases commenced;
 - (b) enforcing, against the Debtors or their estates, a judgment or order obtained before the commencement of the Chapter 11 Cases;
 - (c) collecting, assessing, or recovering a claim against the Debtors that arose before the commencement of the Chapter 11 Cases;
 - (d) taking any action, whether inside or outside the United States, to obtain possession of property of the estates or to exercise control over property, wherever located, of the Debtors' estates or to interfere in any way with the conduct

by the Debtors of their business, including without limitation, attempts to seize or reclaim any equipment, supplies, or other assets in which the Debtors have legal or equitable interests;

- (e) taking any action to usurp or contradict the authority of any of the Debtors' independent directors or the Debtors' Chief Restructuring Officer;
- (f) taking any action to create, perfect, or enforce any lien against property of the Debtors' estates;
- (g) taking any action to create, perfect, or enforce any lien against property of the Debtors, to the extent that such lien secures a claim that arose before the commencement of the Chapter 11 Cases;
- (h) taking any action to collect, assess, or recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases;
- (i) offsetting any debt owing to the Debtors that arose before the commencement of the Chapter 11 Cases against any claim against the Debtors; and
- (j) commencing or continuing a proceeding before the United States Tax Court concerning the Debtors, subject to the provisions of 11 U.S.C. § 362(b).

3. Courts of competent jurisdiction shall take all appropriate measures required to enforce and recognize the Chapter 11 Cases, including but not limited to, application of the worldwide automatic stay and all other orders entered in the Chapter 11 Cases in the relevant jurisdictions.

4. Pursuant to sections 362 and 365(e)(1) of the Bankruptcy Code, and subject to any relevant provisions or exceptions provided for in the Bankruptcy Code, all persons (including individuals, partnerships, corporations, and all those acting for or on their behalf) and all foreign or domestic governmental units (and all those acting for or on their behalf) are prohibited from modifying or terminating any executory contract or unexpired lease, or any right or obligation

under such contract or lease, at any time after the commencement of the Chapter 11 Cases solely because of a provision in such contract or lease that is conditioned on:

- (a) the insolvency or financial condition of the debtor at any time before the closing of the Chapter 11 Cases;
- (b) the commencement of the Chapter 11 Cases; or
- (c) the appointment of a trustee in the Chapter 11 Cases.

5. The Debtors may use reasonable methods of providing notice to any persons (including individuals, partnerships, corporations, other entities, and all those acting on their behalf) and governmental units, whether of the United States, any state or locality therein or any territory or possession thereof, or any foreign country (including any division, department, agency, instrumentality, or service thereof, and all those acting on their behalf), that intends to, is, or may violate the worldwide automatic stay imposed under section 362 of the Bankruptcy Code using such methods as, including but not limited to, publication, certified and non-certified mail, service upon the person's or governmental unit's attorney, facsimile, email, posting on the Debtors' website, hand delivery, and courier.

6. This Order shall not affect (a) the substantive rights of any party or the availability of any of the exceptions contained in sections 362(b) and 365(e)(1) of the Bankruptcy Code; or (b) the right of any party-in-interest to seek relief from the worldwide automatic stay in accordance with section 362(d) of the Bankruptcy Code or with respect to an executory contract or unexpired lease under section 365 of the Bankruptcy Code.

7. Pursuant to, and to the extent set forth in, section 525 of the Bankruptcy Code, all foreign and domestic governmental units are prohibited from (a) denying, revoking, suspending, or refusing to renew any license, permit, charter, franchise, or other similar grant to; (b) placing conditions upon such a grant to; or (c) discriminating with respect to such a grant against any of

the Debtors (or another person with whom any of the Debtors has been associated) solely because any of the Debtors is a debtor under the Bankruptcy Code, or may have been insolvent before or during the Chapter 11 Cases.

8. The Notice, substantially in the form attached hereto as Exhibit 1, is approved. The Debtors are authorized, but not directed, to serve the Notice upon creditors, governmental units, or other regulatory authorities, and/or interested parties wherever located.

9. The Debtors are authorized, but not directed, to translate this Motion, the Order, and the Notice.

10. Nothing in this Order is intended to, or shall, alter the effect of any provision of the Bankruptcy Code, including, without limitation, 11 U.S.C. §§ 362, 365, 525, 555, 556, 560, and 561.

11. Under the circumstances of the Chapter 11 Cases, notice of the Motion is adequate under Bankruptcy Rule 6004(a).

12. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.

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13. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order, including to take appropriate remedial action against any persons that violate the relief granted herein outside of the United States, including, without limitation, (i) holding such persons in contempt; (ii) enjoining any such persons from further violations of the automatic stay or this Order; and/or (iii) issuing any appropriate sanctions that may be enforced against such persons' assets that are located in the United States or subject to the jurisdiction of the courts of the United States.

Exhibit 1

Form of Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LEISURE INVESTMENTS HOLDINGS LLC,
et al.,¹

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

**NOTICE OF ORDER (I) CONFIRMING, RESTATING, AND ENFORCING
THE WORLDWIDE AUTOMATIC STAY, ANTI-DISCRIMINATION PROVISIONS,
AND *IPSO FACTO* PROTECTIONS OF THE BANKRUPTCY CODE, (II) APPROVING
THE FORM AND MANNER OF NOTICE THEREOF, AND
(III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on March 30, 2025, Leisure Investments Holdings LLC and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”) in the United States Bankruptcy Code for the District of Delaware (the “**Court**”). The Debtors’ chapter 11 cases (collectively, the “**Chapter 11 Cases**”) are pending before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, and are being jointly administered under the lead case of *In re Leisure Investments Holdings, LLC, et al.*, Case No. 25-10606 (LSS).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Leisure Investments Holdings LLC (7260); Triton Investments Holdings LLC (6416); MS Leisure Company (7257); Icarus Investments Holdings LLC (2636); Ejecutivos de Turismo Sustentable S.A. de C.V. (5CA4); Dolphin Capital Company, S. de R.L. de C.V. (21H8); Dolphin Leisure, Inc. (7073); Dolphin Austral Holdings, S.A. de C.V. (6A13); Aqua Tours, S.A. de C.V. (6586); Viajero Cibernético, S.A. de C.V. (1CZ7); Promotora Garrafón, S.A. de C.V. (0KA2); Marineland Leisure, Inc. (7388); GWMP, LLC (N/A); Gulf World Marine Park, Inc. (0348); and The Dolphin Connection, Inc. (0322). For the purposes of these chapter 11 cases, the address for the Debtors is Leisure Investments Holdings LLC, c/o Riveron Management Services, LLC, 600 Brickell Avenue, Suite 2550, Miami, FL 33131.

PLEASE TAKE FURTHER NOTICE that pursuant to, and to the extent set forth in, section 362(a) of the Bankruptcy Code, the Debtors' filing of their respective voluntary petitions operates as a self-effectuating statutory stay, applicable to all entities and protecting the Debtors from, among other things: (a) the commencement or continuation of a judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases, or (ii) to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement, against the Debtors or against any property of the Debtors' bankruptcy estates, of a judgment obtained before the commencement of the Chapter 11 Cases; or (c) any act to obtain possession of property of or from the Debtors' bankruptcy estates, or to exercise control over property of the Debtors' bankruptcy estates.

PLEASE TAKE FURTHER NOTICE that pursuant to the *Order (I) Confirming, Restating, and Enforcing the Worldwide Automatic Stay, Anti-Discrimination Provisions, and Ipso Facto Protections of the Bankruptcy Code, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief* [Docket No. [●]], attached hereto as **Exhibit A** (the "**Order**"), entered on April __, 2025, and, all persons wherever located (including individuals, partnerships, corporations, and other entities, and all those acting on their behalf) and all governmental units, whether of the United States, any state or locality therein, or any territory or possession thereof, or any non-U.S. jurisdiction (including any division, department, agency, instrumentality, or service thereof, and all those acting on their behalf), are hereby put on notice that they are subject to the Order and must comply with its terms and provisions.

PLEASE TAKE FURTHER NOTICE that any entity that seeks to assert claims or interests against, seeks to assert causes of action or other legal or equitable remedies against, or

otherwise exercise any rights in law or equity against the Debtors or their estates must do so in front of the Court pursuant the Order, the Bankruptcy Code, and applicable law.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order, any governmental agency, department, division, or subdivision, or any similar governing authority is prohibited from, among other things: (a) denying, revoking, suspending, or refusing to renew any license, permit, charter, franchise, or other similar grant to the Debtors; (b) placing conditions upon such a grant to the Debtors; or (c) discriminating against the Debtors with respect to such a grant, solely because the Debtors are debtors under the Bankruptcy Code, may have been insolvent before the commencement of the Chapter 11 Cases or are insolvent during the pendency of the Chapter 11 Cases, as set forth more particularly in the Order.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order, parties to contracts or agreements with the Debtors are prohibited from terminating such contracts or agreements because of the Debtors' bankruptcy filing, except as permitted by the Court under applicable law.

PLEASE TAKE FURTHER NOTICE that pursuant to sections 105(a) and 362(k) of the Bankruptcy Code and rule 9020 of the Federal Rules of Bankruptcy Procedure, among other applicable substantive law and rules of procedure, any person or governmental unit seeking to assert its rights or obtain relief outside of the processes set forth in the Order, the Bankruptcy Code, and applicable law may be subject to proceedings in front of the Court for failure to comply with the Order and applicable law, including contempt proceedings resulting in fines, sanctions, and punitive damages against the entity and its assets inside the United States.

PLEASE TAKE FURTHER NOTICE that additional information regarding the Chapter 11 Cases, including copies of pleadings filed therein, may be obtained by (a) reviewing the publicly available docket of the Chapter 11 Cases at <http://ecf.deb.uscourts.gov> (PACER login and

password required); (b) accessing the Debtors' publicly available website providing information regarding the Chapter 11 Cases, located online at Dolphininfo@veritaglobal.com; or (c) contacting proposed counsel for the Debtors.

Dated: _____, 2025

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Robert S. Brady (No. 2847)
Sean T. Greecher (No. 4844)
Allison S. Mielke (No. 5934)
Jared W. Kochenash (No. 6557)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Email: rbrady@ycst.com
sgreecher@ycst.com
amielke@ycst.com
jkochenash@ycst.com

Proposed Counsel to the Debtors and Debtors in Possession