

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)

**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND
RELATED DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST
DAY MOTIONS SCHEDULED FOR APRIL 2, 2025 AT 2:00 P.M. (ET), BEFORE
THE HONORABLE LAURIE SELBER SILVERSTEIN IN THE UNITED
STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE²**

This proceeding will be conducted in person.

Parties may observe the hearing remotely by registering with the Zoom link below no later than 12:30 p.m. (ET) the day of the scheduled hearing.

To attend this hearing remotely, please register using the eCourtAppearances tool (available [here](https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl) or on the Court's website <https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>). After the deadline has passed, an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

PLEASE TAKE NOTICE that, on March 31, 2025, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), filed the following 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**”), and related pleadings with the Clerk of the United States Bankruptcy

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 All motions and other pleadings referenced herein are available free of charge by visiting the website maintained by the Debtors' proposed Claims and Noticing Agent, Verita Global at <https://www.veritaglobal.net/dolphinco> or by request to the Debtors' proposed counsel (Beth Olivere, paralegal, at bolivere@ycst.com).



Court for the District of Delaware. The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PETITIONS AND RELATED PLEADINGS

1. Voluntary Petitions

- A. Leisure Investments Holdings LLC ([Case No. 25-10606](#))
- B. Triton Investments Holdings LLC ([Case No. 25-10608](#))
- C. MS Leisure Company ([Case No. 25-10610](#))
- D. Icarus Investments Holdings LLC ([Case No. 25-10612](#))
- E. Ejecutivos de Turismo Sustentable S.A. de C.V. ([Case No. 25-10614](#))
- F. Dolphin Capital Company, S. de R.L. de C.V. ([Case No. 25-10615](#))
- G. Dolphin Leisure, Inc. ([Case No. 25-10616](#))
- H. Dolphin Austral Holdings, S.A. de C.V. ([Case No. 25-10617](#))
- I. Aqua Tours, S.A. de C.V. ([Case No. 25-10618](#))
- J. Viajero Cibernetico, S.A de C.V. ([Case No. 25-10619](#))
- K. Promotora Garrafon, S.A. de C.V. ([Case No. 25-10620](#))
- L. Marineland Leisure, Inc. ([Case No. 25-10621](#))
- M. GWMP, LLC ([Case No. 25-10622](#))
- N. Gulf World Marine Park, Inc. ([Case No. 25-10623](#))
- O. The Dolphin Connection, Inc. ([Case No. 25-10624](#))

2. Declaration of Steven Robert Strom in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [[Docket No. 10](#), 4/1/25]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day motions (collectively, the “**First Day Motions**”) is scheduled for **April 2, 2025 at 2:00 p.m. (ET)** (the “**First Day Hearing**”) before The Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware.

FIRST DAY MOTIONS GOING FORWARD

3. Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [[Docket No. 3](#), 3/31/25]

Status: This matter will be going forward.

4. Debtors' Application for Entry of an Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent, Effective as of the Petition Date [[Docket No. 4](#), 3/31/25]

Status: This matter will be going forward.

5. Debtors' Motion for Entry of an Order (I) Confirming, Restating, and Enforcing the Worldwide Automatic Stay, Anti-Discrimination Provisions, and *Ipsa Facto* Protections of the Bankruptcy Code, (II) Approving the Form and Manner of Notice Thereof, and (III) Granting Related Relief [[Docket No. 5](#), 3/31/25]

Status: This matter will be going forward.

6. Debtors' Motion to Authorize Robert Wagstaff to Act as Foreign Representative of the Debtors [[Docket No. 6](#), 3/31/25]

Status: This matter will be going forward.

7. Debtors' Motion for Entry of an Order (I) Compelling Debtors' Former Officers and Other Required Persons to Turn Over Records and (II) Granting Related Relief [[Docket No. 7](#), 3/31/25]

Status: This matter will be going forward on an interim basis.

8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition First Lien Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[Docket No. 9](#), 4/1/25]

Status: This matter will be going forward on an interim basis.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

[Signature Page Follows]

Dated: April 1, 2025

/s/ Jared W. Kochenash

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