

**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)

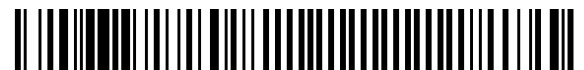
**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of (i) GLAS Americas LLC as the first lien and second lien collateral agent, and (ii) GLAS USA LLC, as the DIP Administrative Agent and Collateral Agent (together, “GLAS”), in the above-captioned chapter 11 cases. Pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 3017(a), 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned respectfully request that all notices and papers filed or entered in these cases be given to and served upon the following:

Evelyn J. Meltzer
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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 section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any orders, notices, applications, motions, petitions, pleadings, complaints, demands, disclosure statements, plans of reorganization, or requests, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, electronic mail, hand delivery, telephone, electronic filing, facsimile, or otherwise, in the above-referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither the filing of this *Notice of Appearance and Request for Service of Notices and Papers* (this “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall be deemed, or construed to constitute, a waiver of any substantive or procedural right of GLAS, including, without limitation: (i) the right to have an Article III judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution, (ii) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (iii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iv) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, (v) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (vi) any election of remedy, or (vii) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 2, 2025
Wilmington Delaware

TROUTMAN PEPPER LOCKE LLP

/s/ Evelyn J. Meltzer

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-and-

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Counsel to GLAS Americas LLC and GLAS USA LLC

CERTIFICATE OF SERVICE

I, Evelyn J. Meltzer hereby certify that on the 2nd day of April 2025, I caused the foregoing *Notice of Appearance and Request for Service of Notices and Papers* to be served by email upon the parties set forth below, in the manner indicated; and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

(Proposed Counsel for the Debtors and Debtors in Possession)

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/s/ Evelyn J. Meltzer

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