Case 25-10606-LSS Doc 10 Filed 0//10/25 Page 1 of 7 Docket #0049 Date Filed: 04/10/2025

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

LEISURE INVESTMENTS HOLDINGS LLC, *et al.*, ¹

Chapter 11

Case No. 25-10606 (LSS)

tors

(Jointly Administered)

Debtors.

CERTIFICATE OF SERVICE

I, Esmeralda Aguayo, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the claims and noticing agent for the Debtors in the above-captioned case.

On April 3, 2025, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3]
- 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]
- 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 [Docket No. 5]
- Debtors' Motion to Authorize Robert Wagstaff to Act as Foreign Representative of the Debtors [Docket No. 6]

¹ Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: 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.



- 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]
- 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 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]
- Declaration of Steven Robert Strom in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 10]
- Notice of Filing of Revised Proposed Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent, Effective as of the Petition Date [Docket No. 19]
- Notice of Filing of Revised Proposed 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. 20]
- Notice of Filing of Revised Proposed Order (I) Compelling Debtors' Former Officers and Other Required Persons to Turn Over Records and (II) Granting Related Relief [Docket No. 22]
- Notice of Filing of Revised Proposed Interim Order (I) Authorizing the 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 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. 24]
- Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Docket No. 32]
- Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent, Effective as of the Petition Date [Docket No. 33]
- 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. 34]

- Order Authorizing Robert Wagstaff to Act as Foreign Representative of the Debtors [Docket No. 37]
- Interim Order (I) Compelling Debtors' Former Officers and Other Required Persons to Turn Over Records and (II) Granting Related Relief [Docket No. 38]

Dated: April 10, 2025

/s/ Esmeralda Aguayo

Esmeralda Aguayo Verita 222 N Pacific Coast Highway, 3rd Floor El Segundo, CA 90245 Tel 310.823.9000

Exhibit A

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Core/2002 Service List

Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email			
			John.dodd@bakermckenzie.com;			
			Blaire.cahn@bakermckenzie.com;			
Counsel to the Prepetition First Lien		Blaire Cahn, John Dodd, Paul	paul.keenan@bakermckenzie.com;			
Noteholders and DIP Lenders	Baker & McKenzie LLP	J. Keenan Jr., Kevin Whittam	kevin.whittam@bakermckenzie.com			
Counsel to Eduardo Albo Villanueva	Cervantes Diaz Abogados, S.C.	Alejandro Diaz Steta	adiaz@cdabogados.com.mx			
Counsel to Eduardo Albo Villanueva	Clyde & Co.	Vicente Banuelos	Vicente.Banuelos@Clydeco.com			
County Attorney's Office for Bay	County Attorney's Office for Bay					
County, Florida	County	Brian Leebrick	bleebrick@baycountyfl.gov			
County Attorney's Office for Miami	County Attorney's Office for					
Dade County, Florida	Miami Dade County	Geri Bonzon-Keenan	gbk@miamidade.gov			
			attorney.general@state.de.us;			
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	attorney.general@delaware.gov			
DE Secretary of State	Delaware Secretary of State	Division of Corporations	dosdoc bankruptcy@state.de.us			
DE State Treasury	Delaware State Treasury		statetreasurer@state.de.us			
			citizenservices@myfloridalegal.com;			
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	oag.civil.eserve@myfloridalegal.com			
Counsel to the DIP Agent, Prepetition		And Bankruptoy Department	oug.orvi.coorve@myilondulegui.com			
First Lien Collateral Agent &						
Prepetition Second Lien Collateral						
Agent (GLAS Americas LLC and						
GLAS USA LLC)	Foley & Lardner LLP	Adrienne K. Walker	awalker@foley.com			
DIP Agent, Prepetition First Lien		Autientie R. Walker	awaiker@ioley.com			
Collateral Agent & Prepetition Second						
Lien Collateral Agent	Glas Americas, LLC	Luke Russell				
IRS	Internal Revenue Service	Attn Susanne Larson	Luke.russell@glas.agency SBSE.Insolvency.Balt@irs.gov			
Counsel to Sculptor Capital			SBSE.Insolvency.bail@irs.gov			
Management, Inc. (Prepetition Second						
Lien Noteholders)	Latham & Watkins LLP	James Ktsanes	James.ktsanes@lw.com			
Counsel to The Prudential Insurance						
Company of America, Prudential						
Legacy Insurance Company of New						
Jersey, and Cigna Health and Life						
Insurance Company (together the "DIP	5	Scott D. Cousins, Ann M.	scott.cousins@lewisbrisbois.com;			
Lenders")	LLP	Kashishian	ann.kashishian@lewisbrisbois.com			
	Office of the United States					
US Trustee for District of DE	Trustee Delaware	Benjamin A. Hackman	benjamin.a.hackman@usdoj.gov			
Counsel to Eduardo Albo Villanueva	Santamarina y Steta, S.C.	Carlos Brehm T	cbrehm@s-s.mx			
	Securities & Exchange		bankruptcynoticeschr@sec.gov;			
SEC Regional Office	Commission	NY Regional Office	nyrobankruptcy@sec.gov			
	Securities & Exchange					
SEC Regional Office	Commission	PA Regional Office	philadelphia@sec.gov			
	Securities & Exchange		SECBankruptcy-OGC-ADO@SEC.GOV;			
SEC Headquarters	Commission	Secretary of the Treasury	secbankruptcy@sec.gov			
Counsel to the DIP Agent, Prepetition						
First Lien Collateral Agent &						
Prepetition Second Lien Collateral						
Agent (GLAS Americas LLC and						
GLAS USA LLC)	Troutman Pepper Locke, LLP	Evelyn J. Meltzer	evelyn.meltzer@troutman.com			
	US Attorney for District of					
US Attorney for District of Delaware	Delaware	US Attorney for Delaware	usade.ecfbankruptcy@usdoj.gov			

Exhibit B

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Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Counsel to Eduardo Albo Villanueva	Cervantes Diaz Abogados, S.C.	Alejandro Diaz Steta	Goldsmith 135	Polanco, Miguel Hidalgo		Ciudad de Mexico		11550	Mexico
				Camino a Santa Teresa		Parques del			
Counsel to Eduardo Albo Villanueva	Clyde & Co.	Vicente Banuelos	Garza Tello	No. 187 C PISO 3		Pedregal		14010	Mexico
County Attorney's Office for Bay	County Attorney's Office for Bay								
County, Florida	County	Brian Leebrick	840 W 11th Street			Panama City	FL	32401	
County Attorney's Office for Miami	County Attorney's Office for		111 NW 1st Street, Suite						
Dade County, Florida	Miami Dade County	Geri Bonzon-Keenan	2810			Miami	FL	33128	
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	Attn Bankruptcy Department	Carvel State Building	820 N French St	Wilmington	DE	19801	
DE Secretary of State	Delaware Secretary of State	Division of Corporations	Franchise Tax	PO Box 898		Dover	DE	19903	
			820 Silver Lake Blvd., Suite						
DE State Treasury	Delaware State Treasury		100			Dover	DE	19904	
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	PL-01 The Capitol			Tallahassee	FL	32399-1050	
DIP Agent, Prepetition First Lien									
Collateral Agent & Prepetition									
Second Lien Collateral Agent	Glas Americas, LLC	Luke Russell	3 Second Street Suite 206			Jersey City	NJ	07311	
IRS	Internal Revenue Service	Attn Susanne Larson	31 Hopkins Plz Rm 1150			Baltimore	MD	21201	
		Centralized Insolvency							
IRS	Internal Revenue Service	Operation	PO Box 7346			Philadelphia	PA	19101-7346	
Counsel to Sculptor Capital									
Management, Inc. (Prepetition			330 North Wabash Avenue,						
Second Lien Noteholders)	Latham & Watkins LLP	James Ktsanes	Suite 2800			Chicago	IL	60611	
	Office of the United States				J. Caleb Boggs				
US Trustee for District of DE	Trustee Delaware	Benjamin A. Hackman	844 King St Ste 2207	Lockbox 35	Federal Building	Wilmington	DE	19801	
		-	-			-			
			Campos Eliseos 345, floors						
Counsel to Eduardo Albo Villanueva	Santamarina y Steta, S.C.	Carlos Brehm T	2 and 3 Chapultepec Polanco	Miguel Hidalgo		Mexico City		11560	Mexico
	Securities & Exchange								
SEC Regional Office	Commission	NY Regional Office	Regional Director	100 Pearl St., Suite 20-100		New York	NY	10004-2616	
	Securities & Exchange				1617 JFK				
SEC Regional Office	Commission	PA Regional Office	Regional Director	One Penn Center	Boulevard Ste 520	Philadelphia	PA	19103	
	Securities & Exchange								
SEC Headquarters	Commission	Secretary of the Treasury	100 F St NE			Washington	DC	20549	
·	US Attorney for District of								
US Attorney for District of Delaware	Delaware	US Attorney for Delaware	1313 N Market Street	Hercules Building		Wilmington	DE	19801	