

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

In re: LEISURE INVESTMENTS HOLDINGS LLC, <i>et al.</i> , Debtors.	Chapter 11 Case No. 25-10606 (LSS) (Jointly Administered)
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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE
PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that the undersigned counsel hereby enter their appearance for Interested Party, Eduardo Albor (“*Mr. Albor*”) pursuant to section 1109(b) of the Bankruptcy Reform Act of 1978, as codified in title 11 of the United States Code, 11 U.S.C. §§ 101-1532, Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon Mr. Albor through his undersigned counsel, as follows:

Michael Busenkell, Esquire Gellert Seitz Busenkell Brown, LLC 1201 North Orange Street Suite 300 Wilmington, DE 19801 Telephone: (215) 238-0010 Telecopy: (302) 425-5814 Email: mbusenkell@gsbblaw.com	James C. Moon, Esq. (<i>pro hac vice</i> forthcoming) Daniel N. Gonzalez, Esq. (<i>pro hac vice</i> forthcoming) MELAND BUDWICK, P.A. 3200 Southeast Financial Center 200 South Biscayne Boulevard Miami, Florida 33131 Telephone: (305) 358-6363 Telecopy: (305) 358-1221 Email: jmoon@melandbudwick.com Dgonzalez@melandbudwick.com
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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Mr. Albor does not, and shall not be deemed or construed to: (a) constitute a submission by Mr. Albor to the jurisdiction of the Bankruptcy Court; or (b) constitute consent by Mr. Albor to entry by the Bankruptcy Court of any final order or judgment, or any other order having the effect of a final order or judgment, in any non-core proceeding or with respect to any matter for which the Bankruptcy Court lacks jurisdiction and/or constitutional authority to enter a final order, **which consent is hereby withheld unless expressly granted in the future with respect to a specific issue, matter, or proceeding.**

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by Mr. Albor does not, and shall not be deemed or construed to be a waiver or relinquishment of any substantive or procedural right, including but not limited to: (a) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on, or any other order having the effect of a final order or judgment on, any matter; (b) the right to trial by jury in any proceedings so triable herein, in any associated adversary proceedings, in any litigation presently or hereafter pending in any other court, or in any other case, controversy, or proceeding; (c) the right to seek withdrawal of the

bankruptcy reference by a United States District Court in any matter subject to mandatory or discretionary withdrawal; and/or (d) any other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which Mr. Albor is or may be entitled under agreements, at law, in equity, or otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers as to Mr. Albor for which mailed or personal service is required under any applicable law, rule, regulation, or order.

Dated: April 17, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

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-and-

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