

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. Nos. 7 and 73

**DEBTORS' WITNESS LIST FOR HEARING SET FOR
MAY 21, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their undersigned counsel, hereby submit their list of witnesses (the “**Witness List**”) in connection with the hearing currently scheduled for May 21, 2025, at 10:00 a.m. (prevailing Eastern Time) (the “**Hearing**”), at which the Debtors intend to present (a) for approval on a final basis, the *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] (the “**Turnover Motion**”), and (b) for approval, the *Debtors’ Motion for Entry of an Order (I) Enforcing (A) the Automatic Stay and (B) the Court’s Order Compelling Debtors’ Former Officers and Other Required Persons to Turn Over Records, and (II) Granting Related Relief* [Docket No. 73] (the “**Enforcement Motion**” and together with the Turnover Motion, the “**Motions**”).

WITNESSES

The Debtors intend to elicit testimony from the following individuals in support of the Motions:

¹ Due to the large number of debtors in these chapter 11 cases, which are being jointly administered, a complete list of the Debtors is not provided herein. A complete list of the Debtors along with the last four digits of their tax identification numbers, where applicable, may be obtained on the website of the Debtors’ noticing and claims agent at <https://veritaglobal.net/dolphinco>, or by contacting counsel for the Debtors. 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.



1. **Steven Robert Strom**: The Debtors will rely on the testimony introduced through Mr. Strom's declaration [Docket No. 10], which was admitted into evidence at the April 29, 2025 hearing.

2. **Robert Wagstaff**: The Debtors will rely on the testimony introduced through Mr. Wagstaff's declaration [Docket No. 73, Exhibit B], which was admitted into evidence at the April 29, 2025 hearing. The Debtors also anticipate offering supplemental in-person direct examination of Mr. Wagstaff at the Hearing.

3. **Margarita Luna Ramos**: The Debtors anticipate offering by declaration, pursuant to Rule 44.1 of the Federal Rules of Civil Procedure, the testimony of Ms. Luna. The Debtors also anticipate offering supplemental in-person direct examination of Ms. Luna at the Hearing.

The Debtors reserve their rights to (a) call any witness identified by any other party in connection with the Hearing; (b) call any witnesses necessary to rebut the testimony of any witness called or designated by any other party; and/or (c) offer additional in-person testimony of the above-listed witnesses. Further, the Debtors reserve their rights to amend or supplement this Witness List at, or in advance of, the Hearing.

Dated: May 20, 2025
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,
LLP**

/s/ Sean T. Greecher

Robert S. Brady (No. 2847)

Sean T. Greecher (No. 4484)

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

Counsel to the Debtors and Debtors in Possession