

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

LEISURE INVESTMENTS HOLDINGS  
LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

Hearing Date: June 2, 2025 at 10:00 a.m. (ET)

Re: D.I. 7, 73

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
OF LEISURE INVESTMENTS HOLDINGS LLC IN (1) 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; AND (2) THE DEBTOR'S 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**

The Official Committee of Unsecured Creditors of Leisure Investments Holdings LLC (the “Committee”), by and through their undersigned proposed counsel, hereby files this joinder (the “Joinder”) to (1) 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* [D.I. 7] (the “Turnover Motion”); and (2) 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* [D.I. 73] (the “Enforcement Motion”), and respectfully state as follows:

<sup>1</sup> 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.



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**JOINDER AND RESERVATION OF RIGHTS**

1. The Committee joins, adopts, and incorporates the arguments set forth in Leisure Investments Holdings LLC, *et al.*'s (the "**Debtors**") Turnover Motion and Enforcement Motion.
2. The Committee reserves its rights to amend, supplement, and/or otherwise modify this Joinder and to raise objections as may be appropriate, and to fully participate in any hearings and resolutions concerning the subject matter hereof.

**CONCLUSION**

WHEREFORE, the Committee respectfully requests that the Court (i) grant the Turnover Motion; (ii) grant the Enforcement Motion; and (iii) grant such other and further relief to the Debtors as is just and proper.

Dated: May 29, 2025

Respectfully submitted,

/s/ Thomas J. Francella, Jr.  
Thomas J. Francella, Jr. (No. 3835)  
RAINES FELDMAN LITRELL LLP  
824 North Market Street, Suite 805  
Wilmington, DE 19801  
(302) 772-5805  
tfrancella@raineslaw.com

-and-

LAW OFFICES OF MANGANELLI, LEIDER &  
SAVIO, P.A.  
Christian Savio  
1900 N.W. Corporate Blvd., Ste. 200W  
Boca Raton, FL 33431  
561-826-1740  
csavio@mls-pa.com  
*Proposed Counsel to the Committee of Unsecured  
Creditors*

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(Jointly Administered)

**CERTIFICATE OF SERVICE**

I, Thomas J. Francella, Jr. certify that on May 29, 2025, I caused a copy of the foregoing document to be served via NEF upon all parties receiving such service.

Dated: May 29, 2025

Respectfully submitted,

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)  
RAINES FELDMAN LITTRELL LLP  
824 North Market Street, Suite 805  
Wilmington, DE 19801  
(302) 772-5805  
tfrancella@raineslaw.com

*Proposed Counsel to the Committee of Unsecured  
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