

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)

Ref. Docket No. 114

Objection Deadline:
June 13, 2025 at 4:00 p.m. (ET)

NOTICE OF FILING OF SUPPLEMENT TO LIST OF
ORDINARY COURSE PROFESSIONALS

PLEASE TAKE NOTICE that, on May 1, 2025, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) entered the *Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 114] (the “**Order**”).²

PLEASE TAKE FURTHER NOTICE that, in addition to the professionals listed on Exhibit 2 to the Order, and pursuant to paragraph 3 of the Order, the Debtors hereby supplement the OCP List (the “**Supplemental OCP List**”), as reflected in **Exhibit A** hereto.

PLEASE TAKE FURTHER NOTICE that, in accordance with the procedures set forth in the Order, the Debtors hereby file the declaration of Nancy E. Halpern, DVM, of Fox Rothschild LLP, attached hereto as **Exhibit B**.

¹ Due to the large number of Debtors in these chapter 11 cases 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Order.



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PLEASE TAKE FURTHER NOTICE that any responses or objections to the Supplemental OCP List must be in writing, filed with the Court, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801, and served upon the Debtors' undersigned counsel on or before **4:00 p.m. (ET) on June 13, 2025**.

Dated: May 30, 2025

/s/ Sean T. Greecher

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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

EXHIBIT A

Supplemental OCP List

Firm Name	Address	Description of Service	OCP Cap
Fox Rothschild LLP	212 Carnegie Center, Suite 400, Princeton, New Jersey 08450	Legal Services – Regulatory Counsel for Animal Welfare and Care	\$25,000

EXHIBIT B

Declaration

**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)

Ref. Docket No. 114

Obj. Deadline: June 13, 2025 at 4:00 p.m. (ET)

**DECLARATION OF DISINTERESTEDNESS OF FOX ROTHSCHILD, LLP PURSUANT
TO THE ORDER (I) AUTHORIZING THE DEBTORS TO RETAIN AND
COMPENSATE PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF
BUSINESS AND (II) GRANTING RELATED RELIEF**

I, Nancy E. Halpern, DVM, declare under penalty of perjury:

1. I am a Partner in the law firm of Fox Rothschild LLP, located at 212 Carnegie Center, Suite 400, Princeton, New Jersey 08540 (the “**Firm**”).²

2. Leisure Investments Holdings LLC, and certain of its affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”), have requested that the Firm provide services to the Debtors as Regulatory Counsel for Animal Welfare and Care at Leisure Investments Holdings LLC’s U.S. subsidiaries regulated under the Animal Welfare Act by USDA (Gulf World Marine Park, Inc., MS Leisure Company, Marineland Leisure Inc., The Dolphin Connection, Inc.), and the Firm has consented to provide such services.

¹ Due to the large number of Debtors in these chapter 11 cases a complete list of the Debtors is not provided herein. A complete list of the Debtors 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.

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 59].

3. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Chapter 11 Cases for persons that are parties in interest in the Chapter 11 Cases. The Firm, however, does not perform services for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in the Chapter 11 Cases.

5. Neither I nor any principal, partner, director, officer, of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

6. Neither I nor any principal, partner, director, officer, of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter upon which the Firm is to be employed.

7. Neither I nor any principal, partner, director, officer of, or professional employed by, the Firm, insofar as I have been able to ascertain, has any connections to the Debtors' former management (including, without limitation, Mr. Eduardo Albor).

8. The Firm's current customary hourly rates, subject to change from time to time, range from \$270 to \$1400 per hour for lawyers and from \$125 to \$590 per hour for paralegals. The current rates for this matter are \$710 per hour for Nancy Halpern, DVM, Esq., and \$540 per

hour for associate, Jonathan Madara, Esq. In the normal course of business, the Firm revises its hourly rates and advises that, effective January 1st of each year, the aforementioned rates will be revised to the hourly rates that will be in effect at that time.

9. The Debtors do not owe the Firm anything for prepetition services, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C.

10. As of the Petition Date, which was the date on which the Debtors commenced the Chapter 11 Cases, the Firm was not party to an agreement for indemnification with certain of the Debtors.

11. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 30, 2025



Nancy E. Halpern, DVM, Esq.