

**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)

Hearing Date: July 23, 2025 at 10:00 a.m. (ET)

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

**APPLICATION TO RETAIN AND EMPLOY
RAINES FELDMAN LITTRELL, LLP AS CO-COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT
TO BANKRUPTCY CODE SECTION 1103 EFFECTIVE AS OF [INSERT DATE]**

The Official Committee of Unsecured Creditors of Debtors Leisure Investment Holdings LLC, *et al.*, (the “Committee”), duly appointed pursuant to section 1102 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) by the Office of the United States Trustee pursuant to the *Amended Notice of Appointment of Committee of Unsecured Creditors* filed on May 15, 2025 [D.I. 151] to serve in the above-captioned bankruptcy cases, hereby applies to this Court pursuant to Bankruptcy Code Section 1103 for an order authorizing the retention and employment of Raines Feldman Littrell LLP (“Raines”), as co-counsel to the Committee, effective as of May 23, 2025. In support of this Application, the Committee relies on the *Verified Statement of Thomas J. Francella, Jr.* (the “Francella Verified Statement”), attached hereto as **Exhibit A**, and the *Declaration of Rosy Rodriguez* (the “Rodriguez Declaration”), a copy of which is

¹ 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.



attached hereto as **Exhibit B**. In further support of this Application, the Committee represents as follows:

JURISDICTION AND VENUE

1. Pursuant to 28 U.S.C. §§ 157 and 1334, this Court has jurisdiction to consider and grant the relief requested herein. A proceeding to consider and grant such relief is a core proceeding pursuant to 28 U.S.C. § 157(b) and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. The Committee confirms its consent pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are Sections 327 and 1103 of the Bankruptcy Code. Relief is also proper pursuant to Rule 2014 of the Bankruptcy Rules and Rules 2014-1 and 2016, and Rule 9013-1(1) of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

BACKGROUND

3. On March 31, 2025, (the “Petition Date”), each of the Debtors filed a voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. The Office of the United States Trustee appointed the Committee, consisting of the following three (3) members: (i) Atlantic/Pacific Products, Inc., (ii) Promotions Guy LLC, and

(iii) Xpand Staffing LLC.

5. On May 23, 2025, the Committee retained Raines to provide legal services to the Committee as its local counsel in the Debtors' bankruptcy cases.

6. The Committee seeks to retain and employ Raines as counsel in these chapter 11 cases, effective as of May 23, 2025, to represent the Committee in all matters for which it requires representation, on the terms and subject to the conditions described below.

7. The Committee believes that representation by Raines is critical in its efforts to represent the interests of the unsecured creditors in these chapter 11 cases because Raines has significant familiarity and understanding of the business, legal and financial issues that will arise in the Debtors' cases. Thus, Raines is well-suited to guide the Committee through the chapter 11 process before this Court.

8. Raines is qualified for the type of representation required by the Committee. Raines has a significant bankruptcy practice, including participation in local, regional and national cases in many of its offices. Raines has experience and knowledge in most aspects of the laws that may arise in these cases, including substantial bankruptcy, environmental, corporate, employee benefits, finance, employment, litigation, securities, and tax expertise. Raines' attorneys appear regularly in bankruptcy courts throughout the country and have played significant roles in many large and complex cases across those regions.

9. The Committee anticipates that Raines will render general legal services as needed throughout the course of these chapter 11 cases. In particular, the Committee anticipates that Raines, in conjunction with the Law Offices of Manganelli, Leider & Savio, P.A., will perform, among others, the following legal services:

- (a) Advise the Committee regarding its rights, powers and duties as a committee elected pursuant to Bankruptcy Code Section 1103;

- (b) Advise and consult with the Committee on the conduct of these cases, including all legal and administrative requirements under chapter 11;
- (c) Attend meetings and negotiate with representatives of the Debtors, secured and unsecured creditors, lessors, governmental agencies, equity holders, employees and other parties in interest;
- (d) Advise the Committee regarding any contemplated sale of assets or business combinations including the negotiation of asset sales, stock purchases, mergers or joint ventures, formulation and implementation of bidding procedures, evaluation of competing offers, drafting of appropriate documents regarding proposed sales and counseling regarding the closing of such sales;
- (e) Advise the Committee regarding prepetition and post-petition financing and cash collateral arrangements and negotiate documents relating thereto;
- (f) Advise the Committee on matters relating to Debtors' assumption, assumption and assignment and rejection of executory contracts and unexpired leases;
- (g) Advise the Committee on matters relating to the ordinary course of business including employment matters, tax, environmental, banking, insurance, securities, corporate, business operation, contracts, joint ventures, real and personal property, press and public relations matters and regulatory matters;
- (h) Provide advice and counseling on actions to protect and preserve the Debtors' estates including actions and proceedings by the Debtors or other designated parties to recover assets, defense of actions and proceedings brought against the estate, negotiations regarding all litigation in which the Committee may be involved and objections to claims filed against the estates;
- (i) Prepare and file necessary motions, applications, answers, orders, reports and papers;
- (j) Review all pleadings, financial and other reports filed by the Debtors in these chapter 11 cases and advise the Committee about the implications;
- (k) Review the nature and validity of any liens asserted against the Debtors' property and advise the Committee concerning the enforceability of such liens;
- (l) Investigate the acts, conduct, assets, liabilities, and financial condition of the Debtors, the operation of the Debtors' businesses and the desirability of the continuance of such businesses, and any other matter relevant to these cases or to the formulation of a plan;
- (m) Commence and conduct any and all litigation necessary or appropriate to assert rights held by the Committee and/or protect assets of the chapter 11 estates;
- (n) Negotiate and participate in the preparation of the Debtors' plan(s) of

reorganization, related disclosure statement(s) and other related documents and agreements and advise and participate in the confirmation of such plan(s);

- (o) Attend meetings with third parties and participate in negotiations with respect to the above matters;
- (p) Appear before this Court, other courts, and the United States Trustee to protect and represent the interests of the Committee and the Committee's constituents;
- (q) Meet and coordinate with other counsel and other professionals representing the Debtors and other parties in interest;
- (r) Perform all other necessary legal services and provide all necessary legal advice to the Committee in connection with these chapter 11 cases; and
- (s) Handle such other matters as may be requested by the Committee and to which Raines agrees.

10. The Committee requires knowledgeable counsel to render these essential professional services. Raines has agreed to act on behalf of the Committee and will avoid duplication of services being provided by other professionals.

DISINTERESTEDNESS OF COUNSEL

11. Except as set forth in the Verified Statement, to the best of the Committee's knowledge, information and belief, the partners, counsel and associates of Raines do not have any connection with the Debtors, its affiliates or subsidiaries, its creditors, the United States Trustee or any person employed in the Office of the United States Trustee, or any other party in interest or their respective attorneys and accountants; are "disinterested persons" within the meaning of Bankruptcy Section 101(14) and do not represent any interests adverse to the Debtors' estates.

12. More specifically as set forth in the Verified Statement:

- a. Neither Raines nor any attorney at Raines holds or represents an interest adverse to the Debtors estates. As set forth in the Verified Statement, Raines has in the past and presently represents certain of the Debtors' creditors and parties in interest in matters unrelated to the Debtors and/or the Debtors' bankruptcy and Raines will not represent such creditors or parties in interest in this bankruptcy case.
- b. Neither Raines nor any attorney at Raines is or was a creditor, an equity holder or an insider of any of the Debtors.

- c. Neither Raines nor any attorney at Raines is or was an investment banker for any outstanding security of any of the Debtors.
- d. Neither Raines nor any attorney at Raines is or was an investment banker for any security of the Debtors or an attorney for an investment banker in connection with the offer, sale or issuance of any security of the Debtors.
- e. Neither Raines nor any attorney at Raines is or was a director, officer or employee of the Debtors or of an investment banker for any of the Debtors.
- f. Neither Raines nor any attorney at Raines has an interest materially adverse to the interests of the Debtors' estates or of any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with or interest in the Debtors or an investment banker specified in the foregoing paragraphs, or for any other reason except as specifically set forth in the Verified Statement.

13. Considering the foregoing, the Committee believe that Raines is a "disinterested person" within the meaning of Section 101(14) of the Bankruptcy Code. Raines has informed the Committee that if any of the foregoing statements and representations change during the pendency of these cases, Raines will amend this Application and/or the Verified Statement, as applicable

PROFESSIONAL COMPENSATION

14. The range of standard rates for attorneys presently contemplated to be involved in this matter range from \$495 per hour for more junior associates to \$1,300 per hour for the more experienced partners. Raines may utilize other Raines attorneys whose rates vary from the range referenced above when necessary to properly serve the interests of the Committee. Billing rates for paraprofessionals varies and range from approximately \$375 per hour to \$1,300 per hour.

15. The principal attorneys and paralegals presently designated to represent the Committee and the standard hourly rates for this Case are:

- | | | |
|-----|-----------------------------------|------------------------|
| (a) | Thomas J. Francella, Jr., Partner | \$880 per hour |
| (b) | Mark W. Eckard, Partner | \$780 per hour |
| (c) | Stephen M. Mott, Associate | \$495 per hour |
| (d) | Paralegals | \$375 - \$465 per hour |

16. Raines will apply to the Court for allowance of compensation for professional services rendered and reimbursement of costs and expenses incurred during these cases in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules of this Court and other applicable orders of this Court.

17. Raines will charge the Committee for certain services provided and costs and expenses incurred in connection with the services provided. It is the policy of Raines to charge its clients in all areas of practice for most expenses and costs incurred on behalf of a client and in connection with a client's case. Such expenses include, but are not limited to, photocopies, travel expenses (mileage, parking, airfare, lodging, meals and ground transportation), long distance telephone charges, telecopier costs, delivery and courier services, express mail, computerized research tools such as LEXIS, WESTLAW and PACER, court costs and filing fees, court reporters, hearing transcripts, expert witnesses, and certain secretarial overtime expenses. Raines will charge the Committee for these costs and expenses consistent with charges generally made to the firm's other clients.

18. Raines has agreed to accept as compensation such sums as may be allowed by this Court based on the professional time spent, the rates charged for such services, the necessity of such services, the reasonableness of the time within which the services are performed and the complexity, importance and nature of the problems, issues and tasks addressed in these cases.

19. Other than as set forth above and in the Verified Statement, no arrangement is proposed between the Committee and Raines for compensation to be paid in these cases and no agreement or understanding exists between Raines and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with these

cases.

EFFECTIVE DATE OF RETENTION

20. The Committee requested that Raines immediately commence services before this Application could be heard or approved. Accordingly, Raines commenced performing services for the Committee on May 23, 2025. The Committee requests that the retention of Raines be approved effective as of May 23, 2025.

NO PRIOR REQUEST

21. No prior requests for the relief sought herein have been made to this Court by the Committee in these cases.

NOTICE

22. Notice of this Application has been provided to the following parties or, in lieu thereof, to their counsel, if known: (i) the Office of United States Trustee; (ii) the Debtors; (iii) the Debtors' counsel; (iv) those persons who have requested notice pursuant to Bankruptcy Rule 2002 and (v) each of the Debtors' thirty (30) largest unsecured creditors (excluding members of the Committee). The Committee submits that no other or further notice need be provided.

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WHEREFORE, the Committee respectfully requests the entry of an order, substantially in the form filed contemporaneously with this Application, pursuant to Bankruptcy Code Section 1103 authorizing the Committee to retain and employ Raines Feldman Littrell, LLP as its attorneys to perform the legal services that will be necessary during these chapter 11 bankruptcy cases and such further relief as is just and proper.

Dated: June 6, 2025

Respectfully submitted,

By Official Committee of Unsecured Creditors of
Leisure Investment Holdings LLC., et al.

/s/ Rosy Rodriguez
Committee Chair

EXHIBIT A

Francella Verified Statement

**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)

VERIFIED STATEMENT OF THOMAS J. FRANCELLA, JR.

Pursuant to 2014(a) of the Federal Bankruptcy Rules of Civil Procedure, I, Thomas J. Francella, Jr. of Raines Feldman Littrell, LLP (“Raines”), hereby declare under penalty of perjury that the following is true and correct.

1. I am a partner of Raines, located at 824 North Market Street, Suite 805, Wilmington, DE 19801. This statement is submitted in support of the *Application to Retain and Employ Raines Feldman Littrell, LLP as Co-Counsel for the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025* (the “Application”).

2 I am duly authorized to make this Verified Statement on behalf of Raines and to submit this Verified Statement in support of the Application. Unless otherwise stated in this Verified Statement, the following is based on the best of my personal knowledge as of the date hereof following reasonable investigation. To the extent any information disclosed herein requires

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amendment or modification upon the completion of further analysis or as additional information becomes available, a supplemental Verified Statement will be submitted to the Court reflecting such amended or modified information.

3. As specifically set forth herein, Raines and certain of its partners, counsel and associates have worked with, may currently work with, and likely in the future will work with, certain of the Debtors' creditors and other parties in interest in ongoing matters unrelated to these chapter 11 cases. To the best of my knowledge, none of these business relations constitute interests materially adverse to the Debtors or their bankruptcy estates.

4. To review potential conflicts of interest in these cases, as well as to determine all "connections" (as such term is defined in Bankruptcy Rule 2014) with parties-in-interest and potential parties-in-interest in these Chapter 11 cases, Raines has searched its database for connections with the parties and entities listed on **Schedule 1** to this Verified Statement.

5. Based on the conflict searches conducted to date and described herein, to the best of my knowledge, neither I, nor any partner, counsel, or associate of Raines, in so far as I have been able to ascertain, currently represent or has represented the parties listed on **Schedule 1**.

6. **Schedule 2** attached hereto identifies certain creditors, equity holders or other parties in interest that Raines currently represents or has represented in the past three years in matters unrelated to the Debtors and their chapter 11 cases. Unless identified on **Schedule 2** or otherwise described herein, Raines does not currently represent and has not represented in the past the parties listed on **Schedule 1** as of the date of the filing of this Application.

7. To the best of my knowledge, information and belief, Raines has no other connection with any of the Debtors' creditors or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the

United States Trustee.

8. As with any bankruptcy case, it is difficult to say with certainty that all material relationships have been discovered at this point in these cases. Accordingly, Raines will periodically update its conflicts database and if any new material relationships are discovered, they will be disclosed in a supplemental filing with the Court.

9. Raines and certain of its partners, counsel and its associates currently represent, have represented in the past, and likely will continue to represent creditors of the Debtors and other parties in interest in connection with matters unrelated to the Debtors and these chapter 11 cases. As of the filing of the Application, Raines is not aware of any such representations. Raines has not represented, is not representing, and will not represent any entities or any of their respective affiliates in connection with any matters that are related to the Debtors or these chapter 11 cases.

10. Moreover, pursuant to sections 327 and 1103 of the Bankruptcy Code, Raines is not disqualified from acting as the Committee's bankruptcy counsel merely because it represents certain of the Debtors' creditors, equity security holders or other parties in interest in matters related to these chapter 11 cases.

11. Therefore, each of the parties, counsel or associates of Raines, insofar as I have been able to ascertain, (a) do not have any connection, except as otherwise set forth herein, with the Debtors, their creditors or any other parties in interest, the United States Trustee for the District of Delaware or any person employed in the office of the same, United States District Court Judges for the District of Delaware, United States Magistrate Judges for the District of Delaware, or the United States Bankruptcy Judges for the District of Delaware, (b) is a "disinterested person," as that phrase is defined in Section 101(14) of the Bankruptcy Code, as required by Section 327(a) of the Bankruptcy Code, and (c) does not hold or represent any interest adverse to the Debtors'

estates.

12. During these chapter 11 cases, Raines proposed to be compensated at the rates of their attorneys in effect as of the Petition Date and on the terms and conditions consistent with what Raines normally charges clients that are not chapter 11 debtors. Raines' standard terms and conditions of engagement require prompt payment of the hourly rates as adjusted from time to time in accordance with Raines' established billing practices and reimbursement of out-of-pocket disbursements at cost or based on formulas that approximate the actual cost where the actual cost is not readily ascertainable.

13. Subject to these terms and conditions, Raines intends to apply for compensation for professional services rendered on an hourly basis and reimbursement for expenses incurred in connection with these chapter 11 cases, subject to the Court's approval and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of this Court.

14. The hourly rates and corresponding rate structures to be used by Raines in these chapter 11 cases are comparable to the hourly rates and corresponding rate structure used by Raines for restructuring, workout, bankruptcy, insolvency, and comparable matters, as well as similar complex corporate, securities, and litigation matters, whether in court or otherwise, regardless of whether a fee application is required.

15. Other attorneys and paralegals at Raines may be called upon on occasion to assist in the representation. The range of standard rates for attorneys presently contemplated to be involved in this matter range from \$ per hour for paraprofessionals to \$375-\$445 per hour for associate and more experienced partners. Raines may utilize other Raines attorneys whose rates vary from the range referenced above when necessary to properly serve the interests of the

Committee.

16. The hourly rates charged by Raines' professionals differ based on, among other things, such professional's experience. These rates may change from time to time in accordance with Raines' established billing practices.

17. Raines also will charge for all actual out-of-pocket expenses incurred by Raines on the Committee's behalf, such as filing fees, document reproduction, long distance telephone and telecopier charges, mail and express mail charges, travel expenses, overnight courier expenses, computer research, expenses for "working meals," transcription costs and other disbursements. Raines will charge for these expenses in a manner and at rates consistent with charges made generally to other clients of Raines. Raines will make every effort to minimize expenses in these chapter 11 cases.

18. Raines will maintain detailed, contemporaneous records of time and any actual and necessary expenses incurred in connection with the rendering of the legal services described above by category and nature of the services rendered.

19. No promises have been received by Raines nor by any partner, counsel or associate thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code and as described herein. Raines has no other agreement with any other entity to share with such entity any compensation received by Raines in connection with these chapter 11 cases.

20. Raines further states that pursuant to Bankruptcy Rule 2016(b), it has not shared nor agreed to share (a) any compensation it has received or may receive, in connection with these chapter 11 cases, with another party or person, other than with the partners, counsel and associates and contract attorneys associated with Raines, or (b) any compensation another person or party

has received or may receive in connection with the chapter 11 cases.

21. The following information is provided in response to the request for additional information set forth in paragraph D.1. of the U.S. Trustee Guidelines:

Question: Did you agree to any variations from, or otherwise to, your standard or customary billing arrangements for this engagement?

Response: No.

Question: Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?

Response: No.

Question: If you represented the client in the past 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months pre-petition. If your billing rates and material financial terms have changed post-petition, explain the difference and the reason for the difference.

Response: N/A

Question: Has your client approved your prospective budget and staffing plan, and if so, for what budget period?

Response: The Client understands that the Committee professionals are subject to the budget attached to the Second Interim Order (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, which remains subject to negotiation by and between the Committee, the Debtor and the DIP Lender.

22. I, Thomas J. Francella, Jr., one of the partners at Raines Feldman Littrell, LLP, declare under penalty of perjury that the foregoing is true and correct.

Dated: June 6, 2025

RAINES FELDMAN LITTRELL LLP

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)

824 North Market Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

tfrancella@raineslaw.com

*Proposed Co-Counsel to the Committee of
Unsecured Creditors*

Schedule I

Client

Official Committee of Unsecured Creditors of Leisure Investments Holdings LLC

Potential related/ affiliated to Client

Atlantic/ Pacific Products, Inc.

Promotions Guy LLC

Xpand Staffing LLC

Debtors and Non-Debtor Affiliates

Aqua Tours, S.A. De C.V.

AT Travel Discovery, S.A. de C.V.

Balmoral Dolphins

Caribbean Festival, S.r.L.

Cheshire Hall Limited

Controladora Dolphin, S.A. de C.V.

DCTCI, Ltd.

Desarrollo Corporativo del Pacifico, S.A. de C.V.

Dolphin Austral Holdings, S.A. De C.V.

Dolphin Capital Company, S. de R.L. de C.V.

Dolphin Cove Cayman, Ltd.

Dolphin Cove Limited

Dolphin Cove Negril Limited

Dolphin Cove TCI, Ltd.

Dolphin Discovery Anguilla, Ltd.

Dolphin Discovery BVI, Ltd.

Dolphin Discovery Cayman, Ltd.

Dolphin Discovery Limited

Dolphin Discovery, Inc.

Dolphin Downtown PC, S.r.L.

Dolphin Leisure, Inc.

Dominican Fantasy, S.r.L.

Dtraveller Limited

Ejecutivos de Turismo Sustentable, S.A. De C.V.

Embassy of the Seas Limited

Euro Park, S.r.L.

Gulf World Marine Park, Inc.

GWMP, LLC

Icarus Investments Holdings, LLC

Kima, S.r.L.

Leisure Investments Holdings, LLC

Marine Adventure Park, Ltd.

Marineland Leisure, Inc.

MS Leisure Company (Florida)

Plunimar, S.A.

Promotora Garrafón, S.A. De C.V.

Reserva Bengala, S.A. de C.V.

SB Holdings Limited

Servicios Compartidos Para El
Entretenimiento, S.A. de C.V.
Servicios Compartidos Para El
Entretenimiento, S.A. De C.V.
TDC Leisure Holdings, LLC
The Dolphin Connection, Inc.
Too Cool, Ltd.
Tours R Us, Ltd.
Triton Investments Holdings, LLC
Viajero Cibernético, S.A. De C.V.
Whale Lovers de México, S.A. de C.V.
World of Dolphins, Inc.
Zoomarine Italia, S.p.A.
Zoomarine Travel, S.r.L.

Banks

Banca Monte dei Paschi di Siena, S.p.A.
Banca Nazionale del Lavoro, S.p.A
Banca Popolare di Spoleto, S.p.A.
Banca Sella, S.p.A.
Banco BBVA Argentina, S.A.
Banco BPM, S.p.A
Banco de la Provincia de Buenos Aires
Banco de Reservas de la República
Dominicana, Banco de Servicios Múltiples
Banco Dominicano del Progreso, S.A.
Banco Mercantil del Norte, S.A., Institución
de Banca Múltiple, Grupo Financiero Banorte
Banco Nación
Banco Nacional de México, S.A.
Banco Popular Dominicano, S.A.
Banco Santander México, S.A.
BancorpSouth Bank
Bank of America, N.A.
Bank of Nova Scotia
Banorte S.A.
BBVA México, S.A.
BNP Paribas BNL
Cadence Bank, N.A.
CIBanco, S.A.
Compass Bank & Trust Corporation
Crédit Agricole Cariparma
Crédit Agricole Italia, S.p.A.
First Caribbean Int. Bank
First Caribbean International Bank Limited
First National Northwest Florida Bank
Intensa Sanpaolo, S.p.A
Intercam Banco, S.A.
JPMorgan Chase Bank, N.A.

La Cassa di Ravenna, S.p.A
PNC Bank, N.A.
Poste Italiane, S.p.A
Regions Financial Corporation
Scotiabank Inverlat, S.A.
UBI Banca
UniCredit
UniCredit, S.p.A
Unione di Banche Italiane, S.p.A
Wise US, Inc.

Competitors

Acuario Arrecifal, S.A. De C.V.
Amster DMC
Bioparque Roma, S.p.A
Cinecitta' World S.p.A.
Costa Edutainment, S.p.A.
Falcon's Beyond Global, Inc.
Grupo Xcaret, S.A.P.I. de C.V.
Hydro Mania Corp
Keys Adventure Tours, Inc.
Luneur parks, S.p.A
Magicland, S.r.L
Miracle Strip Shipwreck Island Corp. d/b/a
Shipwreck Island Waterpark
Operadora Xuna, S.A. de C.V.
Parques Reunidos Servicios Centrales, S.A.
Theatre of the Sea, Inc
Webber Corporation d/b/a Coconut Creek
Adventure Park
Zooworld Zoological and Botanical
Conservatory, Inc.

Current and Former Directors and Officers

Albert Diaz Silveira
Alejandro Garcia Blanco Mata
Concepcion Esteban Manchado
Donna Brewer Kassewitz
Eduardo Albor Villanueva
Edwin Gonzalez
John Gordon Olson
Juan Alfonso Delgado Del Olmo Andres
Coronel German Fernández Monroe Capital
Travis William Burke
Mario Eduardo Abarca Cervera Gonzalo
Pacheco Perez
Michael Wesley Wood
Renato Lenzi
Scott Gordon Olson
Sergio Said Jacome Palma
Stafford Burrowes

Steven Strom
Valeria Margarita Albor Dominguez

Taxing and Regulatory Authorities

Administración Federal De Ingresos Públicos
Administración Portuaria Integral de Quintana Roo
Agencia De Recaudación De Buenos Aires
Ayuntamiento De Benito Juárez (Cancún)
Ayuntamiento De Conzumel
Ayuntamiento De Isla Mujeres
Ayuntamiento De Isla Mujeres
Ayuntamiento De Los Cabos
Ayuntamiento De Otho P. Blanco
Ayuntamiento De Solidaridad
Ayuntamiento Municipal De Higüey
Città Di Civitavecchia
Città Di Pomezia
City of Miami
City of Panama City Beach
Companies Office of Jamaica
Comune Di Roma
Florida Department of Environmental Protection
Florida Department of Revenue
Florida Fish and Wildlife Conservation Commission
Gobierno Del Estado De Baja California Sur –
Subdirección De Protección Civil: Anuancias
De Protección Civil
Gobierno Del Estado De Quintana Roo –
Fundación De Parques Y Museos De Cozumel
Gobierno Del Estado De Quintana Roo –
Licencias De Alcohol
Gobierno Del Estado De Quintana Roo –
Licencias De Funcionamiento Estatal
Government of Saint Kitts and Nevis
Italian Ministry of Cultural Heritage and Activities and Tourism
Italian Ministry of Education, Universities and Research
Italian Ministry of Health Italian Ministry of The Interior
Miami-Dade County Office of the Tax Collector
Ministerio de Ambiente y Desarrollo Sostenible - Argentina
Ministerio De Turismo Rep. Dominicana
Ministry of Economy - Argentina
Monroe County Tax Collector
Municipalidad De General Pueyrredón
Municipio De Bahía De Banderas, Nayarit
Nevis Island Administration
Office of the Attorney General for the State of Florida
Procuraduría Federal De Protección Al
Ambiente (Profepa)
Secretaría De Desarrollo Agrario, Territorial
Y Urbano (Sedatu)
Secretaria De Ecología Y Medio Ambiente

Del Estado De Quintana Roo (Sema)
Servicio De Administración Tributaria De Quintana Roo
Servicios Estatales De Salud En Quintana Roo (Sesa)
St. James Municipal Corporation
St. Kitts & Nevis Inland Revenue Department
State of Florida Department of Business
and Professional Regulation
State of Florida Department of Health
Tax Administration Jamaica
Town of Marineland, Florida
U.S. Environmental Protection Agency
U.S. Internal Revenue Service
Unione Dei Comuni Della Bassa Romagna

Insurance Carriers

Advantage General Insurance Company Limited
Arch Capital Group, Ltd
AXIS Insurance Co.
Axis Surplus Insurance Company
Bridgefield Casualty Insurance Company
Concept Special Risks Ltd.
Grupo Mexicano de Seguros, S.A. De C.V.
Honor PCF Trust I
James River Insurance Company
Landmark American Insurance Company
Lexington Insurance Company
Nagico Insurances
RSUI Group Inc.
Scottsdale Insurance Co.
Seguros Atlas, S.A.
Thona Seguros, S.A.

Landlords

Banco Santander S.A.
Bird Rock Beach Hotel St. Kitts
Cabo De Las Corrientes S.A.
CWI Keys Hotel LLC
Eduardo Albor Villanueva
Hawks Cay Resort
La Fundación de Parques y Museos de Cozumel
MDC v. MS Leisure Corporation Complaint
Miami-Dade County
Municipio de Isla Mujeres (Garrafon)
Ocean Adventures
Operadora de Hoteles la Costa, S.A. de C.V.
Promociones E Inversiones Almendro, S.A. De C.V.
Promociones Turisticas Mahahual S.A. De C.V.
Quintana Roo Government
Tradewinds Ltd., v. Grupo Dolphin Discovery
Turismo De Aventura S.A. De C.V.
Viajes Acuáticos Turquesa, S.A. De C.V.

Equity Interest Holders

AVRA Limitless, LLC
Banco Invex, S.A.
CiBanco, S.A.
Cosmo Investments, LLC
Donna Brewer Kassewitz
Eduardo Albor Villanueva
John Gordon Olson
Jose Luis Padilla Magaña
Michael Wesley Wood
Stafford Burrowes

Litigation Parties

Miami-Dade County
Ocean Adventures
Tradewinds Ltd.

Debtors' Professionals

Kurtzman Carson Consultants, LLC d/b/a
Verita Global
Riveron Management Services, LLC
Young Conaway Stargatt & Taylor, LLP

Secured Creditors

CIG & Co. JPM, LLC
GLAS Americas
Leisure Investment Funding, LLC
Prudential Financial, Inc.
Prudential Legacy Insurance Company of New Jersey
The Cigna Group

Delaware Bankruptcy Judges

Dorsey, John T.
Goldblatt, Craig T.
Horan, Thomas M.
Owens, Karen B.
Shannon, Brendan L.
Silverstein, Laurie Selber
Stickles, J. Kate
Walrath, Mary F.

Office of the United States Trustee

Benjamin Hackman
Christine Green
Diane Giordano
Dion Wynn
Edith A. Serrano
Elizabeth Thomas
Hannah M. McCollum
Hawa Konde

Holly Dice
James R. O'Malley
Jane Leamy
Jonathan Lipshie
Jonathan Nyaku
Joseph Cudia
Joseph McMahon
Lauren Attix
Linda Casey
Linda Richenderfer
Malcolm M. Bates
Michael Girello
Nyanquoi Jones
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch
Timothy J. Fox, Jr.

Utilities

Acea Ato 2, S.p.A.
Acea Energia, S.p.A.
ADN Service, Ltda. S.R.L.
Agua y Saneamientos Argentinos, S.A
Aguakan S.A. De C.V
Altice Dominicana S.A.
AMA, S.p.A.
América Móvil, S.a.B. de C.V.
AT&T Mexico
AT&T, Inc.
Bay County Utility Services
Cable and Wireless (Cayman Islands) Limited
Caribbean Utilities Company, Ltd.
Cellco Partnership d/b/a Verizon Wireless
Chesapeake Utilities Corporation
Claro Argentina, S.A.
Cliba Ingenieria Urbana, S.A.
Columbus Communications Jamaica Ltd.
d/b/a Flow Jamaica
Comcast Corporation
Comisión Federal De Electricidad
Compañía Dominicana de Teléfonos S.A.
d/b/a Claro Dominicana
Corporación del Acueducto y Alcantarillado
de Santo Domingo
Deboer Propane LLC
Department of Environmental Health (DEH)
Digicel (Cayman) Limited
Digicel Group Limited
Digicel Jamaica Limited
Duke Energy Corporation

Edenor, S.A.
Edesur Dominicana, S.A.
Edesur, S.A.
Empresa Distribuidora de Electricidad del
Este, S.A.
Enel, S.p.A.
Florida Keys Aqueduct Authority
Florida Keys Electric Cooperative Association, Inc.
Florida Power & Light
FLOW
Flow Cayman
Flow Jamaica
Gas Natural Fenosa
Grupo Zeta Gas
Gulf Coast Electric Cooperative, Inc
Italgas, S.p.A.
Jamaica Public Service Company Limited/
National Water Commission
MetroGas, S.A.
Miami-Dade Water & Sewer Department
Movistar (Telefonica)
National Solid Waste Management Authority
National Water Commission
Naturgy BAN, S.A.
NextEra Energy, Inc
Peoples Gas System, Inc.
Solid Waste Management Corporation St. Kitts
St. Johns County Utility Department
St. Kitts & Nevis Cable Communications Ltd.
d/b/a The Cable
St. Kitts Electricity Company, Ltd.
TECO Peoples Gas
Telecentro, S.A.
Telecom Argentina, S.A.
Telefónica de Argentina, S.A.
Telefónica, S.A.
The Cable
The Water Authority of the Cayman Islands
TIM, S.p.A.
T-Mobile US, Inc.
Total Play Telecomunicaciones, S.A. de C.V.
Tropigas Dominicana, S.r.L
Verizon Wireless
Vodafone Italia, S.p.A.
Water Authority - Cayman
Water Services Department St. Kitts
WideOpenWest, Inc.
Wind Tre S.p.A.
Wireless Ventures (Cayman Islands) Ltd
Zeta Gas

Vendors

Abarrotera Del Duero, S.A. de C.V.
Aguilar Espinosa Daniel Atocha
Balch Tours Cancun
Barrera Martinez Ivar
Bimbo, S.A. De C.V.
Bionic Zoo & Aquarium, Inc.
Cabrera Ventura Hector Eduardo
Camara Barrera Veronica Alejandra
Canche Martin Roger Abel
Caravali Import, S.A. De C.V.
Caribe Transfers, S.A. De C.V.
Cervezas Cuauhtemoc Moctezuma, S.A. De C.V.
Coco Frut De Cancun, S. De R.L. De C.V.
Color Max, S.A. De C.V.
Colunga Hernandez Jose Joaquin
Comermwares S.A. De C.V.
Corporacion De Importaciones Y
Exportaciones Mexicanas, S.A. De C.V.
Diken International S. De R.L. De C.V.
Distribuidora Cuauhtemoc Moctezuma de Cozumel, S.A. De C.V.
Eduper Productos Y Servicios, S. De R.L. De C.V.
Embotelladoras Bepensa S.A. De C.V.
Empacadora y Comercializadora de Occidente
S.A. De C.V.
Euan Elide Azeneth
Exim Del Caribe S.A. De C.V.
Frimart S.A. De C.V.
Fruits y Mas Del Caribe, S.A. De C.V.
Full Trading, S.A. de C.V.
G&B Almacenadora S.A. De C.V.
Galeana Cornejo Richard
Garcia Luna Araico Araceli
Grupo Avicola Del Caribe, S.A. de C.V.
Grupo Empresarial Jomick S.A. De C.V.
Grupo Junacun S.A. De C.V.
Grupo Textil Del Caribe S.A. De C.V.
Hernandez Sosa Aaron
Huescas Hernandez Laura Silvia
Industria Quimica de Quintana Roo, S.A. de C.V.
Industria Y Comercio Mar Y Tierra, S.A. de C.V.
Industrial Patrona S.A. De C.V.
Jig Lideres
Kadimatex S.A. De C.V.
Ku Sanchez Alma Veronica
La Miche Rustique S.A. De C.V.
Livek Del Caribe S.A. De C.V.
Nika Industrias S.A. De C.V.
Novelo UC Paula Soledad
Nueva Wal Mart De Mexico S. De R.L. De C.V.
Operadora De Ropa Deportiva Cusma, S.A. de C.V.

Organizacion RG Hermanos S.A. De C.V.
Peluches Marinos. S.A. de C.V.
Planta HBS-Delli S.A. De C.V.
Pollos Cancun S.A. De C.V.
Reveles Urbina Victor Hugo
Segovia Lopez Miguel Angel
Servicios Aventour, S.A. de C.V.
Sigma Foodservice Comercial, S. De R.L. De C.V.
Soluciones En Limpieza Cozuclean S. De R.L. De C.V.
Te La Ponemos Facil S.A. De C.V.
Toallera Popular, S.A. de C.V.
Transportadora Villa Caribe, S. De R.L De C.V.

Schedule 2

Bank of America
JPMorgan Chase Bank, N.A.
Axis Insurance Co.
Lexington Insurance Company
AT&T, Inc.
Comcast Corporation
Duke Energy Corporation
Verizon Wireless

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)

**DECLARATION OF ROSY RODRIGUEZ IN SUPPORT OF APPLICATION
TO RETAIN AND EMPLOY RAINES FELDMAN LITTRELL, LLP AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS.**

I, Rosy Rodriguez, hereby declare (the “Declaration”) pursuant to 28 U.S.C. § 176, that the following statements are true and correct to the best of my knowledge and belief, and the inquiry described herein.

1. I am a member of the Official Committee of Unsecured Creditors of Debtors Leisure Investments Holdings LLC, *et al.*, (the “Committee”) in the above-referenced chapter 11 cases serving on behalf of [insert name]. I serve as Chairperson for the Committee. In such role, I have been authorized by members of the Committee to submit this Declaration in support of the Application to Retain and Employ Raines Feldman Littrell, LLP (“Raines”) as Co-Counsel to the Official Committee of Unsecured Creditors of Debtors Leisure Investment Holdings LLC, *et al.*

2. I have conferred with Raines to ensure that Raines’ billing rates and material terms for the engagement are comparable to the billing rates and material terms for other non-bankruptcy engagements and comparable to other comparably skilled professionals. I have also discussed the

¹ 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.

delegation of work among the other professionals of the Committee.

3. The Committee has been made aware that there may be unforeseen fees and expenses that will need to be addressed by Raines for the Committee. The Committee has also been made aware that the Committee will have the opportunity to review the invoices submitted by Raines, and that legal fees and expenses are subject to approval by the Bankruptcy Court and review by the Office of the United States Trustee and the Debtors.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 6, 2025

/s/Rosy Rodriguez

*Chairperson of the Official Committee of
Unsecured Creditors of Leisure Investment
Holdings LLC, et al.*

**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)

RE: D.I.

**ORDER GRANTING APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF RAINES FELDMAN LITTRELL AS CO-COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT
TO BANKRUPTCY CODE SECTION 1103 EFFECTIVE AS OF [INSERT DATE]**

Upon consideration of the Application of the Official Committee of Unsecured Creditors of Leisure Investments Holdings LLC, *et al.* (the “Committee”), for entry of an order authorizing the employment and retention of Raines Feldman Littrell LLP (“Raines”) as its co-counsel effective as of May 23, 2025 (“Application”);² all as more fully described in the Application; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided; and it appearing that no other or further notice need be provided; and a hearing, if any, having been held to consider the relief requested in the Application

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² Capitalized terms not otherwise defined herein shall have the meanings set forth in the Application.

(“Hearing”); and due and proper notice of the Hearing, if any, having been provided; and upon the record of the Hearing, if any, and all of the proceedings had before the Court; and upon the Verified Statement of Thomas Francella and the Declaration of Rosy Rodriguez submitted in support of the Application; and the Court having found and determined that the relief sought in the Application is in the best interests of the Committee and creditors, and all parties in interest and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. The Committee is authorized, pursuant to section 1103 of the Bankruptcy Code, to employ and retain Raines as its counsel on the terms and conditions set forth in the Application and the Verified Statement of Thomas J. Francella, Jr., effective as of May 23, 2025.
3. Raines shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Bankruptcy Rules, the United States Trustee Guidelines, and any other applicable procedures and orders as this Court may direct.
4. Raines shall make all reasonable efforts to avoid duplication of services provided by the Law Offices of Manganelli, Leider & Savio, P.A., the Committee’s lead counsel in these Chapter 11 Cases.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

6. The Committee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Application.

7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**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)

Hearing Date: July 23, 2025 at 10:00 a.m. (ET)

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

**NOTICE OF APPLICATION TO RETAIN AND
EMPLOY RAINES FELDMAN LITTRELL, LLP AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT
TO BANKRUPTCY CODE SECTION 1103 EFFECTIVE AS OF MAY 23, 2025**

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors of Debtors Leisure Investments Holdings LLC., *et al.*, (the “Committee”), has filed an *Application to Retain and Employ Raines Feldman Littrell, LLP as Co-Counsel to the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Application must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware, 19801, on or before **June 27, 2025 at 4:00 p.m. (ET)** (the “Objection Deadline”). At the same time, you must serve a copy of the objection or response upon the undersigned proposed counsel for the Committee.

¹ 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.

PLEASE TAKE FURTHER NOTICE that if a response is timely filed, serviced and received, you or your attorney must attend the hearing on the Application scheduled to be held before the Honorable Laurie Selber Silverstein at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No.2, Wilmington, Delaware, 19801 on **July 23, 2025 at 10:00 a.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, AN ORDER MAY BE ENTERED GRANTING THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 6, 2025

RAINES FELDMAN LITTRELL LLP

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)

Mark W. Eckard (No. 4542)

824 North Market Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

tfrancella@raineslaw.com

meckard@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 Co-Counsel to the Committee of
Unsecured Creditors*