

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 Nos. 114, 197, & 244

Objection Deadline:

July 10, 2025 at 4:00 p.m. (ET)

**NOTICE OF FILING OF THIRD 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, on May 30, 2025, Leisure Investments Holders LLC, and certain of its affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Notice of Filing of Supplement to List of Ordinary Course Professionals* [Docket No. 197] to include certain additional Ordinary Course Professionals on the OCP List.

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.



251060625062600000000001

PLEASE TAKE FURTHER NOTICE that, on June 20, 2025, the Debtors filed the *Notice of Filing of Second Supplement to List of Ordinary Course Professionals* [Docket No. 244] to include further additional Ordinary Course Professionals on the OCP List.

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 3 of the Order, the Debtors hereby supplement the OCP List (the “**Third 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 Claudio Martinez Santistevan of De la Vega & Martinez Rojas, (the “**Martinez Santistevan Declaration**”) attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Third 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 July 10, 2025**.

[Remainder of Page Intentionally Left Blank]

Dated: June 26, 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
De la Vega & Martinez Rojas	C. Guillermo Gonzalez Camarena, Santa Fe, Zedec Sta Fé, Álvaro Obregón, 01376 Ciudad de México, CDMX, México	Legal Services – advisory support on employment matters, workforce reorganizations, individual and collective terminations, labor litigation, union-related matters, and compliance with applicable labor laws in Mexico	\$15,000

EXHIBIT B

Martinez Santistevan 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: July 10, 2025 at 4:00 p.m. (ET)

**DECLARATION OF DISINTERESTEDNESS OF DE LA VEGA & MARTINEZ ROJAS
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, Claudio Martinez Santistevan, declare under penalty of perjury:

1. I am an Associate of De la Vega & Martinez Rojas, located at C. Guillermo Gonzalez Camarena, Santa Fe, Zedec Sta Fé, Álvaro Obregón, 01376 Ciudad de México, CDMX, México (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 labor and employment legal services to the Debtors, including, without limitation, advisory support on employment matters, workforce reorganizations, individual and collective terminations, labor litigation, union-related matters, and compliance with applicable labor laws in Mexico 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(s) upon which the Firm is to be employed.

7. The Firm's current customary hourly rates, subject to change from time to time, are as follows (amounts expressed in Mexican Pesos – MXN, plus 16% VAT):

- Founding Partner: MXN ₱11,000 per hour
- Partners: MXN ₱10,000 – ₱9,500 per hour
- Senior Advisors: MXN ₱9,500 per hour
- Senior Associate: MXN ₱9,000 per hour
- Associate: MXN ₱7,700 per hour

- Junior Associate: MXN ₱5,500 per hour
- Law Clerk: MXN ₱2,500 per hour

In the normal course of business, the Firm periodically reviews its standard hourly rates and advises that, effective January 1st of each year, the rates set forth above may be adjusted to reflect the Firm's then-current standard hourly rates in effect at that time.

8. The Debtors do not owe the Firm any amounts for prepetition services. Notwithstanding the foregoing, the Firm has agreed to limit its fees in this matter to an amount not to exceed USD \$15,000 per month, exclusive of applicable taxes and expenses, unless otherwise agreed in writing by the parties or authorized by the Court.

9. 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.

10. 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.

Date: June 26, 2025



[Claudio Martínez Santistevan]