

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LEISURE INVESTMENTS HOLDINGS LLC, *et al.*,

Debtors.

Chapter 11

Case No. 25-10606 (LSS)
(Jointly Administered)

RE: D.I. 280

**MOTION FOR SHORTENED NOTICE AND EXPEDITED CONSIDERATION OF
GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO
WITHDRAW AS COUNSEL FOR EDUARDO ALBOR**

Gellert Seitz Busenkell & Brown, LLC, ("GSBB" or the "Firm") hereby moves (the "Motion") the Court for the entry of an order, substantially in the form attached hereto (the "Order") shortening notice and expediting consideration of *Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for Eduardo Albor* (the "Motion to Withdraw") [D.I. 280].

In support of this Motion, GSBB respectfully submits as follows:

JURISDICTION

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief sought herein are section 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9006-1(e) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules").



RELIEF REQUESTED

3. By this Motion, GSBB seeks entry of an order shortening notice of the hearing on the Motion to Withdraw and requests that this Court consider the Motion to Withdraw on an expedited basis, preferably before July 4, 2025.

4. Del. Bankr. LR 9006-1(c)(i) provides that unless the Federal Rules of Bankruptcy Procedure or the Local Rules state otherwise, “all motion papers shall be filed and served in accordance with Local Rule 2002-1(b) at least fourteen (14) days prior to the hearing date.” Del. Bankr. Local Rule 9006-1(e) provides in pertinent part that “no motion will be scheduled on less notice than required by these Rules or the Fed. R. Bankr. P. except by order of the court, on written motion specifying the exigencies justifying shortened notice.”

5. GSBB submits that exigencies justifying shortened notice and expedited consideration of the Motion to Withdraw exist here because GSBB continues to incur fees and expenses in representing Mr. Albor, without any reasonable assurance of payment, despite repeated requests for funds. In addition, the firm faces an imminent and significant financial burden if required to prepare for and participate in an upcoming hearing on damages concerning alleged violations of the automatic stay, scheduled for the near term. The cost of preparing for that hearing, while continuing representation without adequate assurance of payment, would be severely prejudicial to the firm. Accordingly, expedited consideration is warranted to avoid forcing GSBB to undertake extensive further work to its substantial detriment, contrary to principles of fairness and equity.

6. GSBB has made a reasonable effort to notify the relevant parties regarding the expedited relief requested herein. Debtors’ counsel and counsel to the Official Committee of

Unsecured Creditors have no objection to the expedited relief being requested. The Office of the United States Trustee takes no position on the expedited relief being requested

7. GSBB submits that shortened notice and an expedited hearing on the Motion to Withdraw will not substantially prejudice any parties in interest under these circumstances. Thus, expedited relief from this Court is necessary and appropriate under the circumstances.

WHEREFORE, for the reasons set forth herein as well as in the Motion to Withdraw, GSBB respectfully requests the entry of an Order, substantially in the form attached hereto approving the shortening of notice and expedited consideration of the Motion to Withdraw, and granting such other relief as this Court deems just and proper.

Dated: June 30, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell
Michael Busenkell (DE 3933)
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Counsel to Eduardo Albor

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Chapter 11

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RE: D.I. 280 and

**ORDER GRANTING MOTION FOR SHORTENED NOTICE AND EXPEDITED
CONSIDERATION OF GELLERT SEITZ BUSENKELL & BROWN, LLC’S MOTION
TO WITHDRAW AS COUNSEL FOR EDUARDO ALBOR**

AND NOW, upon consideration of the *Motion for Shortened Notice and Expedited Consideration of Gellert Seitz Busenkell & Brown, LLC’s Motion to Withdraw as Counsel for Eduardo Albor* (the “Motion”), it is hereby

ORDERED AND DECREED that the Motion to Shorten is GRANTED.

The hearing on the Motion to Withdraw (as defined in the Motion) shall take place on July _____, 2025, at _____ am/pm (ET); and

The Objection Deadline for the Motion to Withdraw shall be at the time of the hearing.

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2025, I caused a true and correct copy of the foregoing *Motion for Shortened Notice and Expedited Consideration of Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for Eduardo Albor* to be electronically filed and served via CM/ECF to all parties requesting electronic service in this case and upon the parties on core service list via electronic mail or first class mail.

Dated: June 30, 2025

/s/ Michael Busenkell
Michael Busenkell (DE 3933)