

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)

**Re: D.I. 208**

**CERTIFICATE OF NO OBJECTION REGARDING 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 undersigned hereby certifies that, as of the date hereof, he has received no answer or objection to the *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* [Docket No. 208] (the “**Application**”)<sup>2</sup>. Pursuant to the notice, filed with the Application, any objections to the relief requested were to be filed and served so as to be received by June 27, 2025 (the “**Objection Deadline**”).

The undersigned further certifies that he has reviewed the Court’s docket in these cases and no objections or other responses to the Application appears thereon.

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<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 Cybernetical, 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.

<sup>2</sup> Capitalized terms used and not defined herein have the meaning ascribed in the Motion.



WHEREFORE, the Movant respectfully requests that the proposed form of order, as filed with the Application, be entered at the earliest convenience of the Court.

Dated: June 30, 2025

RAINES FELDMAN LITRELL LLP

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