

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. 59 & 114

Obj. Deadline: July 22, 2025 at 4:00 p.m. (ET)

DECLARATION OF DISINTERESTEDNESS OF DUANE MORRIS, 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, Michelle C. Pardo, declare under penalty of perjury:

1. I am a Partner in the law firm of Duane Morris LLP, located at 901 New York Avenue, NW, Suite 700 East, Washington, DC 20001-4795 (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 a United States Department of Agriculture (USDA) administrative matter involving Leisure Investments Holdings LLC’s U.S. subsidiary, Gulf World Marine Park, Inc., which is regulated under the Animal Welfare Act by USDA, 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].



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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, including those parties identified in **Exhibit 1** attached hereto and made a part hereof. 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 hourly rate for the attorney that will be working on the Debtors' matter, which is subject to change from time to time, is \$1,235 per hour. In the normal course of business, the Firm revises its hourly rates and advises that, effective January 1st of each year, the aforementioned rate will be revised to the hourly rate that will be in effect at that

time.

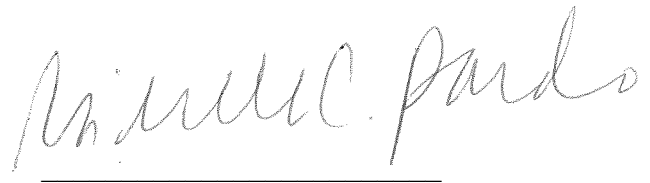
9. The Debtors owe the Firm \$57,283.98 for prepetition services, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C.

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: July 8, 2025

A handwritten signature in cursive script, reading "Michelle C. Pardo", written in dark ink. The signature is positioned above a horizontal line.

Michelle C. Pardo

EXHIBIT 1

Below is a list of parties-in-interest for whom Duane Morris LLP performs services in matters unrelated to the Debtors' Chapter 11 Cases:

1. Certain affiliates of Prudential Financial, Inc.
2. Certain affiliates of Prudential Legacy Insurance Company