Case 25-10606-LSS Doc 359 Filed 07/17/25 Page 1 of 3 Docket #0359 Date Filed: 07/17/2025

### 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)

Ref. Docket Nos. 114, 197, 244, & 256

<u>Objection Deadline</u>: July 31, 2025 at 4:00 p.m. (ET)

#### NOTICE OF FILING OF FOURTH 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**").<sup>2</sup>

**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.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Order.



<sup>&</sup>lt;sup>1</sup> 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.

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, on June 26, 2025, the Debtors filed the *Notice of Filing of Third Supplement to List of Ordinary Course Professionals* [Docket No. 256] 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 "Fourth Supplemental OCP List"), as reflected in <u>Exhibit A</u> hereto.

PLEASE TAKE FURTHER NOTICE that, in accordance with the procedures set forth in the Order, the Debtors hereby file the declaration of Diego A. Armida Verea of González Luna, Moreno y Armida, S.C., (the "Armida Verea Declaration") attached hereto as **Exhibit B**.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Fourth 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 31, 2025**.

[Remainder of Page Intentionally Left Blank]

Dated: July 17, 2025

/s/ Jared W. Kochenash

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
González Luna, Moreno y Armida, S.C.	Paseo de la Reforma 925, Lomas de Chapultepec, C.P. 11000, Mexico City, Mexico	Legal Services – advisory support on tax matters, and compliance with applicable tax laws in Mexico	\$25,000

# <u>EXHIBIT B</u>

Armida Verea Declaration

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

In re:

LEISURE INVESTMENTS HOLDINGS LLC, *et al.*,<sup>1</sup>

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

Debtors.

Ref. Docket No. 114

Obj. Deadline: July 31, 2025 at 4:00 p.m. (ET)

## DECLARATION OF DISINTERESTEDNESS OF GONZÁLEZ LUNA, MORENO Y ARMIDA, S.C., PURSUANT TO THE ORDER (I) AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE PROFESSIONALS UTILIZED IN THE <u>ORDINARY COURSE OF BUSINESS AND (II) GRANTING RELATED RELIEF</u>

I, Diego A. Armida Verea, declare under penalty of perjury:

1. I am a partner of González Luna, Moreno y Armida, S.C., located at Paseo

de la Reforma 925, Lomas de Chapultepec, C.P. 11000, Mexico City, Mexico (the "Firm").<sup>2</sup>

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 legal

services to the Debtors, and the Firm has consented to provide such services.

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

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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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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 from \$100 to \$800 U.S. dollars.

The Debtors owe the Firm \$14,065.00 U.S. dollars for prepetition services,
the payment of which is subject to limitations contained in title 11 of the United States Code, 11
U.S.C. §§ 101–1532.

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.

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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: July, 17, 2025

Diego A. Armida Verea