

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. 302

**CERTIFICATION OF COUNSEL REGARDING *REVISED* PROPOSED ORDER,
PURSUANT TO SECTION 365(d)(4) OF THE BANKRUPTCY CODE, EXTENDING
THE DEADLINE BY WHICH THE DEBTORS MUST ASSUME OR REJECT
UNEXPIRED LEASES OF NON-RESIDENTIAL REAL PROPERTY
UNDER WHICH ANY OF THE DEBTORS ARE LESSEES**

On July 3, 2025, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion for an Order, Pursuant to Section 365(d)(4) of the Bankruptcy Code, Extending the Deadline by Which the Debtors Must Assume or Reject Unexpired Leases of Non-Residential Real Property Under Which Any of the Debtors Are Lessees* [Docket No. 302] (the “**Motion**”). A proposed form of order approving the Application was attached to the Application as Exhibit A (the “**Proposed Order**”). The deadline to file objections or otherwise respond to the Motion was set as July 16, 2025 at 4:00 p.m. (ET) (the “**Objection Deadline**”).

Prior to the Objection Deadline, Miami-Dade County (“**MDC**”) filed an objection (the “**Objection**”) to the Motion. To resolve the Objection, the Debtors have agreed to revise the Proposed Order, as reflected in the revised Proposed Order attached hereto as **Exhibit A**

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.



(the “**Revised Proposed Order**”). For the convenience of the Court and other interested parties, a blackline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors did not receive any objections or responses other than that described herein, and MDC consents to entry of the Revised Proposed Order, the Debtors respectfully request that the Court enter the Revised Proposed Order without further notice or a hearing at the Court’s earliest convenience.

Dated: July 21, 2025

/s/ Allison S. Mielke

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Revised Proposed Order

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**ORDER EXTENDING THE DEADLINE BY WHICH THE DEBTORS MUST ASSUME
OR REJECT UNEXPIRED LEASES OF NON-RESIDENTIAL REAL PROPERTY
UNDER WHICH ANY OF THE DEBTORS ARE LESSEES**

Upon consideration of the motion (the “**Motion**”)² of the Debtors for entry of an order (this “**Order**”), pursuant to section 365(d)(4) of the Bankruptcy Code, granting the Debtors an extension of the statutory deadlines for the Debtors to assume or reject the Real Property Leases; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion has been given under the particular circumstances; and it appearing that no other or further notice is necessary; and this Court having reviewed the Motion; and upon

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

the record of the Chapter 11 Cases; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 365(d)(4) of the Bankruptcy Code, the deadlines for the Debtors to assume or reject the Real Property Leases are hereby extended as follows (collectively, the “**Extended Assumption and Rejection Periods**”):

Debtor(s)	Expiration of the Extended Assumption and Rejection Period
Initial Debtors	October 27, 2025
Controlodora	November 12, 2025
Embassy	December 1, 2025

3. This Order shall be without prejudice to the rights of the Debtors and their estates to seek an extension of the Extended Assumption and Rejection Periods with the consent of an affected Lessor(s).
4. Notwithstanding anything to the contrary herein, entry of this Order as it relates to the lease pursuant to which Debtor MS Leisure Company, Inc. occupies and uses property of Miami-Dade County to, among other things, operate The Miami Seaquarium (the “**MSQ Lease**”) is without prejudice to the rights of Miami-Dade County to argue that the MSQ Lease has been terminated, or to any rights, claims, or defenses of the Debtors in connection with the same, and shall not limit the rights of Miami-Dade County to pursue (and the Debtors and other parties in

interest to contest) relief from the automatic stay to proceed with prepetition litigation in connection with potential eviction, to the extent appropriate, prior to expiration of the Extended Assumption and Rejection Period.

5. To the extent that the Debtors and any Lessor to any of the Real Property Leases agree to a further extension of the time by which the Debtors must assume or reject an applicable Real Property Lease, the Debtors may submit to this Court a consensual form of order approving such further extension, pursuant to section 365(d)(4)(B)(ii) of the Bankruptcy Code, under certification of counsel without the need for further notice or hearing.

6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Blackline

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Motion; and upon the record of the Chapter 11 Cases; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
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4. Notwithstanding anything to the contrary herein, entry of this Order as it relates to the lease pursuant to which Debtor MS Leisure Company, Inc. occupies and uses property of Miami-Dade County to, among other things, operate The Miami Seaquarium (the “**MSQ Lease**”) is without prejudice to the rights of Miami-Dade County to argue that the MSQ Lease has been terminated, or to any rights, claims, or defenses of the Debtors in connection with the

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5. ~~4.~~ To the extent that the Debtors and any Lessor to any of the Real Property Leases agree to a further extension of the time by which the Debtors must assume or reject an applicable Real Property Lease, the Debtors may submit to this Court a consensual form of order approving such further extension, pursuant to section 365(d)(4)(B)(ii) of the Bankruptcy Code, under certification of counsel without the need for further notice or hearing.

6. ~~5.~~ This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.