

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)

**NOTICE OF AGENDA FOR HEARING OF MATTERS  
SCHEDULED FOR JULY 23, 2025 AT 10:00 A.M. (ET)**

**This proceeding will be conducted in person.**

**Parties may observe the hearing remotely by registering with the Zoom link below no later than 4:00 p.m. (ET) the business day before the scheduled hearing.**

**To attend this hearing remotely, please register using the eCourtAppearances tool (available [here](#) or on the Court's website <https://ecf.deb.uscourts.gov/cgi-bin/nvsbAppearances.pl>). After the deadline has passed, an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.**

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM  
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

**RESOLVED/ADJOURNED MATTERS**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 9](#), 4/1/25]

Objection Deadline: April 28, 2025 at 4:00 p.m. (ET) (extended for certain parties)

<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.



Related Pleadings:

- A. Declaration of Steven Robert Strom in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [[D.I. 10](#), 4/25]
- B. Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 40](#), 4/4/25]
- C. Second Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 134](#), 5/9/25]
- D. Third Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 213](#), 6/10/25]
- E. Notice of Extension of Challenge Period Pursuant to Third Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 214](#), 6/11/25]
- F. Debtors' Supplement to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363, and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 227](#), 6/18/25]

- G. Fourth Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 255](#), 6/25/25]
- H. Notice of Second Extension of Challenge Period Pursuant to Fourth Interim Order (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [[D.I. 309](#), 7/7/25]

Responses Received:

- I. Objection of Tradewinds Ltd. to Entry of Final DIP Financing Order and Request for Adequate Protection Pursuant to 11 U.S.C. § 363(e) [[D.I. 144](#), 5/14/25]
- J. Limited Objection of Keys Hotel Operator Inc. to Debtors' Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, Etc. [[D.I. 146](#), 5/14/25]
- K. Informal response of Miami Dade County

Status: Consideration of this matter on a final basis has been adjourned to the omnibus hearing scheduled for August 12, 2025.

2. Application to Retain and Employ the Law Offices of Manganelli, Leider & Savio, P.A. as Co-Counsel to the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025 [[D.I. 207](#), 6/6/25]

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

Related Pleadings:

- A. Certificate of No Objection Regarding Application to Retain and Employ the Law Offices of Manganelli, Leider & Savio, P.A. as Co-Counsel to the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025 [[D.I. 283](#), 6/30/25]

- B. Order Granting Application for Entry of an Order Authorizing the Retention and Employment of the Law Offices of Manganelli, Leider & Savio, P.A. as Co-Counsel to the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025 [[D.I. 295](#), 7/2/25]

Responses Received: None.

Status: An order has been entered. A hearing is not required.

- 3. 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 [[D.I. 208](#), 6/6/25]

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

Related Pleadings:

- A. Certificate of No Objection Regarding Application to 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 [[D.I. 284](#), 6/30/25]
- B. Order Granting Application for Entry of an Order Authorizing the Retention and Employment of 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 [[D.I. 294](#), 7/2/25]

Responses Received: None.

Status: An order has been entered. A hearing is not required.

- 4. Application of the Official Committee of Unsecured Creditors to Retain and Employ Force Ten Partners, LLC as Financial Advisor Effective as of May 23, 2025 [[D.I. 209](#), 6/6/25]

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

Related Pleadings:

- A. Notice of Conflict Search Parties Regarding the Retention and Employment of Force Ten Partners, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of May 23, 2025 [[D.I. 261](#), 6/27/25]
- B. Certificate of No Objection Regarding Application of the Official Committee of Unsecured Creditors to Retain and Employ Force Ten Partners, LLC as Financial Advisor Effective as of May 23, 2025 [[D.I. 285](#), 6/30/25]

- C. Order Authorizing the Official Committee of Unsecured Creditors to Retain Force Ten Partners, LLC as Financial Advisor Effective as of May 23, 2025 [[D.I. 296](#), 7/2/25]

Responses Received: None.

Status: An order has been entered. A hearing is not required.

5. Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ Greenhill & Co., LLC as Investment Banker to the Debtors, Effective as of May 15, 2025 [[D.I. 218](#), 6/13/25]

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

Related Pleadings:

- A. Certification of Counsel Regarding Revised Proposed Order (I) Authorizing the Debtors to Retain and Employ Greenhill & Co., LLC as Investment Banker, Effective as of May 15, 2025, and (II) Granting Related Relief [[D.I. 297](#), 7/2/25]
- B. Order (I) Authorizing the Debtors to Retain and Employ Greenhill & Co., LLC as Investment Banker, Effective as of May 15, 2025, and (II) Granting Related Relief [[D.I. 301](#), 7/3/25]

Responses Received:

- C. Informal Response from the Office of the United States Trustee for the District of Delaware

Status: An order has been entered. A hearing is not required.

6. Debtors' Application for Entry of an Order (I) Authorizing the Employment and Retention of Keen-Summit Capital Partners LLC as Real Estate Advisor and Broker for the Debtors, Effective as of the Commencement Date and (II) Waiving Certain Reporting Requirements [[D.I. 219](#), 6/13/25]

Objection Deadline: June 27, 2025 at 4:00 p.m. (ET)

Related Pleadings:

- A. Certification of Counsel Regarding Revised Proposed Order (I) Authorizing the Employment and Retention of Keen-Summit Capital Partners LLC as Real Estate Advisor and Broker for the Debtors, Effective as of the Commencement Date and (II) Waiving Certain Reporting Requirements [[D.I. 291](#), 7/1/25]

- B. Order (I) Authorizing the Employment and Retention of Keen-Summit Capital Partners LLC as Real Estate Advisor and Broker for the Debtors, Effective as of June 11, 2025 and (II) Waiving Certain Reporting Requirements [[D.I. 300](#), 7/3/25]

Responses Received:

- C. Informal Response from the Office of the United States Trustee for the District of Delaware

Status: An order has been entered. A hearing is not required.

7. Debtors' Motion for an Order Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [[D.I. 282](#), 6/30/25]

Objection Deadline: July 14, 2025

Related Pleadings:

- A. Certificate of No Objection Regarding Docket No. 282 [[D.I. 345](#), 7/15/25]

- B. Order Extending the Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 [[D.I. 347](#), 7/16/25]

Responses Received: None.

Status: An order has been entered. A hearing is not required.

**MATTERS UNDER CERTIFICATION**

8. Debtors' Motion for an Order Establishing Procedures for Sales of Certain Miscellaneous Assets Outside of the Ordinary Course of Business Free and Clear of All Liens, Claims, Interests and Encumbrances Pursuant to Section 363 of the Bankruptcy Code [[D.I. 298](#), 7/2/25]

Objection Deadline: July 16, 2025

Related Pleadings:

- A. Certificate of No Objection Regarding Docket No. 298 [[D.I. 360](#), 7/17/25]

Responses Received: None.

Status: A certificate of no objection has been filed. A hearing is not required unless the Court has questions or concerns.

9. 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 [[D.I. 302](#), 7/3/25]

Objection Deadline: July 16, 2025

Related Pleadings:

- A. 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 [[D.I. 363](#), 7/21/25]

Responses Received:

- B. Miami-Dade County's Limited Objection to Debtors' Motion to Extend Debtors MS Leisure Company, Inc.'s Deadline to Assume or Reject the Miami Seaquarium Lease [[D.I. 354](#), 7/16/25]

Status: A certification of counsel has been filed. A hearing is not required unless the Court has questions or concerns.

### **MATTERS GOING FORWARD**

10. Debtors' Motion for (I) an Order Establishing Bidding Procedures and Granting Related Relief and (II) an Order or Orders Approving the Sale of the Assets [[D.I. 299](#), 7/2/25]

Objection Deadline: July 16, 2025

Related Pleadings: None to Date.

- A. Declaration of Jakub Mleczo in Support of (I) Debtors' Motion for Entry of an Order Establishing Bidding Procedures, and (II) Debtors' Motion for Entry of an Order Establishing Miscellaneous Asset Sale Procedures [[D.I. 364](#), 7/21/25]

Responses Received:

- B. Informal Response from the Office of the United States Trustee for the District of Delaware
- C. Informal Response from Keys Hotel Operator, Inc. (d/b/a Hawks Cay Resort)
- D. Objection of Tradewinds, LTD to Debtors' Motion for (I) and Order Establishing Bidding Procedures and Granting Related Relief and (II) an Order or Orders Approving the Sale of the Assets [[D.I. 349](#), 7/16/25]

Status: The Debtors anticipate filing a certification of counsel resolving items B through D prior to the hearing.

11. Debtors' Motion for Entry of an Order (I) Enforcing (A) the Automatic Stay and (B) the Court's (1) Turnover Order and (2) Stay Enforcement Order, and (II) Granting Related Relief [[D.I. 332](#), 7/9/25]

Objection Deadline: July 16, 2025

Related Pleadings:

- A. Order (I) Enforcing (A) the Automatic Stay and (B) the Court's Order Compelling Debtors' Former Officers and Other Required Persons to Turn Over Records, and (II) Granting Related Relief [[D.I. 205](#), 6/5/25]
- B. Order Imposing Sanctions on Eduardo Albor for Violation of the Automatic Stay [[D.I. 257](#), 6/26/25]
- C. Certification of Eduardo Albor Pursuant to U.S.C. § 1746 [[D.I. 259](#), 6/27/25]
- D. Declaration of Alfonso Duenas Barajas in Support of Eduardo Albor, in Connection with the Constitutional Claims (Amparos) Filed in Mexico [[D.I. 305](#), 7/7/25]
- E. Declaration of Robert Wagstaff (I) in Response to the Certification of Eduardo Albor Pursuant to 28 U.S.C. 1746 and (II) in Support of Debtors' Motion for an Order (I) Enforcing (A) the Automatic Stay and (B) the Court's (1) Turnover Order and (2) Stay Enforcement Order, and (II) Granting Related Relief [(Sealed) D.I. 333, 7/9/25; (Redacted) [D.I. 344](#), 7/14/25]
- F. Notice of Submission of Costs in Connection with Orders Enforcing the Automatic Stay and Imposing Sanctions [[D.I. 355](#), 7/16/25]

Responses Received: None.

Status: This matter is going forward with respect to imposition of costs and further sanctions.

*[Signature Page Follows]*



Dated: July 21, 2025

*/s/ Sean T. Greecher*

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