

**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)

Docket Ref. Nos. 332, 355

**DEBTORS' WITNESS LIST FOR HEARING SET FOR
JULY 23, 2025 AT 10:00 A.M. (PREVAILING EASTERN TIME)**

Leisure Investments Holdings LLC and certain of its affiliates (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases hereby submit this witness list identifying the witnesses that the Debtors intend to or may offer in connection with the hearing currently scheduled on July 23, 2025 at 10:00 a.m. (prevailing Eastern Time) (the “**Hearing**”), at which the Debtors intend to present for approval (a) the *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* [Docket No. 332] (the “**Motion to Enforce**”), and (b) the *Notice of Submission of Costs in Connection with Order Enforcing the Automatic Stay and Imposing Sanctions* [Docket No. 355] (the “**Sanctions Notice**”).

¹ Due to the large number of debtors in these chapter 11 cases, which are being jointly administered, 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.



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WITNESSES

The Debtors may elicit testimony from the following individuals at the Hearing:

1. **Robert Wagstaff**

In support of the Motion to Enforce, Debtors will offer by declaration the testimony of Mr. Robert Wagstaff. Specifically, the Debtors will introduce into evidence the *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 Entry of an Order (A) Enforcing (1) the Automatic Stay and (2) the Court's Turnover Order and Stay Enforcement Order, and (III) Granting Related Relief* [Docket No. 333, Exhibits A–J] (the “**Wagstaff Declaration**”).

Debtors also anticipate proffering brief testimony from Mr. Wagstaff in support of the Motion to Enforce and Sanctions Notice.

2. **Matias Marambio Calvo**

In support of the Motion to Enforce, the Debtors may also proffer the brief testimony of Mr. Matias Marambio Calvo, Director at Riveron, in connection with issues related to the Wagstaff Declaration.

PLEASE TAKE FURTHER NOTICE THAT the Debtors reserve their rights to (a) call any witness identified by any other party in connection with the Hearing; (b) call any witnesses necessary to rebut the testimony of any witness called or designated by any other party; and/or (c) offer the live or proffered testimony of the above-listed witnesses. Further, the Debtors reserve their rights to amend or supplement this list at, or in advance of, the Hearing.

[Signature page follows]

Dated: July 22, 2025

/s/ Sean T. Greecher

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