

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

|  |   |                                |
|--|---|--------------------------------|
| In re: Leisure Investments Holdings LLC, <i>et al.</i> , | ) | Chapter: 11                    |
|  | ) |                                |
| Debtors  | ) | Case No.: 25-10606 (LSS)       |
| _____  | ) |                                |
|  | ) |                                |
| Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd.,)     | ) |                                |
|  | ) |                                |
| Plaintiff,   | ) | Adv. Proc. No.: 25-51024 (LSS) |
|  | ) |                                |
| v.   | ) |                                |
|  | ) |                                |
| Controladora Dolphin, SA de CV, <i>et al.</i> ,          | ) |                                |
|  | ) |                                |
| Defendants.  | ) |                                |

**SUMMONS AND NOTICE OF PRETRIAL CONFERENCE  
IN AN ADVERSARY PROCEEDING**

YOU ARE SUMMONED and required to file a motion or answer to the complaint which is attached to this summons with the clerk of the bankruptcy court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days.

Address of the Clerk:

824 Market Street, 3<sup>rd</sup> Floor  
Wilmington, DE 19801

At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorney.

William D. Sullivan, Esq.  
William A. Hazeltine, Esq.  
**Sullivan Hazeltine Allinson LLC**  
919 North Market Street, Suite 420  
Wilmington, DE 19801  
Tel: (302) 428-8191  
[wsullivan@sha-llc.com](mailto:wsullivan@sha-llc.com)  
[whazeltine@sha-llc.com](mailto:whazeltine@sha-llc.com)

J. Andrew Fine, Esq.,  
**FineCounsel**  
115 E. Main Street, Suite A  
Durham, NC 27707  
Telephone: (919) 307.6311  
[jaf@finecounsel.law](mailto:jaf@finecounsel.law)

If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 7012.



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**YOU ARE NOTIFIED** that a pretrial conference of the proceeding commenced by the filing of the complaint will be held at the following time and place.

|   |   |
|---|---|
| <b>824 Market Street, 6<sup>th</sup> Floor<br/>Wilmington, DE 19801</b> | <b>Courtroom 2<br/><br/>October 27, 2025 at 2:00 p.m.</b> |
|---|---|

**IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**



**United States Bankruptcy  
Court for the District  
of Delaware**

/s/ Steven L. Grant  
Clerk of the Bankruptcy Court

Date: September 12, 2025

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

|   |   |                                |
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| In re: Leisure Investments Holdings LLC, <i>et al.</i> ,  | ) | Chapter: 11                    |
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|   | ) |                                |
| Controladora Dolphin, SA de CV, <i>et al.</i> ,           | ) |                                |
|   | ) |                                |
| Defendants.   | ) |                                |

## **NOTICE OF DISPUTE RESOLUTION ALTERNATIVES**

As party to litigation you have a right to adjudication of your matter by a judge of this Court. Settlement of your case, however, can often produce a resolution more quickly than appearing before a judge. Additionally, settlement can also reduce the expense, inconvenience, and uncertainty of litigation.

There are dispute resolution structures, other than litigation, that can lead to resolving your case. Alternative Dispute Resolution (ADR) is offered through a program established by this Court. The use of these services are often productive and effective in settling disputes. The purpose of this Notice is to furnish general information about ADR.

The ADR structures used most often are mediation, early-neutral evaluation, mediation/arbitration and arbitration. In each, the process is presided over by an impartial third party, called the “neutral”.

In mediation and early neutral evaluation, an experienced neutral has no power to impose a settlement on you. It fosters an environment where offers can be discussed and exchanged. In the process, together, you and your attorney will be involved in weighing settlement proposals and crafting a settlement. The Court in its Local Rules requires all ADR processes, except threat of a potential criminal action, to be confidential. You will not be prejudiced in the event a settlement is not achieved because the presiding judge will not be advised of the content of any of your settlement discussions.

Mediation/arbitration is a process where you submit to mediation and, if it is unsuccessful, agree that the mediator will act as an arbitrator. At that point, the process is the same as arbitration. You, through your counsel, will present evidence to a neutral, who issues a decision. If the matter in controversy arises in the main bankruptcy case or arises from a subsidiary issue in an adversary proceeding, the arbitration, though voluntary, may be binding. If a party requests *de novo* review of an arbitration award, the judge will rehear the case.

Your attorney can provide you with additional information about ADR and advise you as to whether and when ADR might be helpful in your case.

Dated September 12, 2025

/s/ Stephen L. Grant  
*Clerk of Court*

### CERTIFICATE OF SERVICE

I, Heidi M. Coleman, certify that I am, and at all times during the service of process was, not less than  
(name)

18 years of age and not a party to the matter concerning which service of process was made. I further certify that  
the service of this summons and a copy of the complaint was made on September 12, 2025 by:  
(date)



Mail Service: Regular, first class United States mail, postage fully pre-paid, addressed to:

#### SEE EXHIBIT A



Personal Service: By leaving the process with defendant or with an officer or agent of defendant at:



Residence Service: By leaving the process with the following adult at:



Certified Mail Service on an Insured Depository Institution: By sending the process by certified mail  
addressed to the following officer of the defendant at:



Publication: The defendant was served as follows: [Describe briefly]



State Law: The defendant was served pursuant to the laws of the State of \_\_\_\_\_,  
as follows: [Describe briefly] (name of state)

Under penalty of perjury, I declare that the foregoing is true and correct.

September 12, 2025  
Date

/s/ Heidi M. Coleman  
Signature

Print Name: Heidi M. Coleman, AACCP, DCP  
Sullivan Hazeltine Allinson LLC  
Business Address: 919 North Market Street, Suite 420  
Wilmington, DE 19801

# **EXHIBIT A**

*Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. v. Controladora Dolphin, SA de CV, et al.*  
Adv. Pro. No. 25-51024 (LSS)

**SUMMONS AND COMPLAINT SERVICE LIST**

*Defendant, Dolphin Leisure, Inc.:*

Dolphin Leisure, Inc.  
Attn: President, CEO or other Officer or Agent  
1001 Brickell Bay Drive, Suite 2110  
Miami, FL 33131

Dolphin Leisure, Inc.  
c/o Edwin Donzalez, Registered Agent  
377 Eagle Drive  
Panama City, FL 32407

Dolphin Leisure, Inc.  
Attn: President, CEO or other Officer or Agent  
377 Eagle Drive  
Panama City, FL 32407

Dolphin Leisure, Inc.  
Attn: President, CEO or other Officer or Agent  
c/o Riveron Management Services, LLC  
600 Brickell Avenue, Suite 2550  
Miami, FL 33131

*Defendant, Glas Americas LLC, as Administrative Agent:*

Glas Americas LLC, as Administrative Agent  
Attn: President, CEO or other Officer or Agent  
3 Second Street Suite 206  
Jersey City, NJ 07311

Glas Americas LLC, as Administrative Agent  
c/o Adrienne K. Walker, Esq.  
Foley & Lardner LLP  
111 Huntington Avenue Suite 2500  
Boston, MA 02199

Glas Americas LLC, as Administrative Agent  
c/o Evelyn J. Meltzer, Esq.  
Troutman Pepper Locke LLP  
Hercules Plaza, Suite 1000  
1313 N. Market Street,  
P.O. Box 1709  
Wilmington, DE 19899-1709

Glas Americas LLC, as Administrative Agent  
Attn: President, CEO or other Officer or Agent  
366 Madison Avenue  
15th Floor  
New York, NY 10017

Glas Americas LLC, as Administrative Agent  
Attn: President, CEO or other Officer or Agent  
633 3rd Ave, Suite 13C  
New York NY 10017

Glas Americas LLC, as Administrative Agent  
c/o Registered Agent Solutions, Inc.  
10 Ferry St., Suite 313  
Concord, NH 03301

*Defendant, The Prudential Insurance Company of America:*

The Prudential Insurance Company of America  
Attn: President, CEO or other Officer or Agent  
Prudential Tower  
655 Broad Street, 17<sup>th</sup> Floor – South Tower  
Newark, NJ 07102

The Prudential Insurance Company of America  
c/o Scott D. Cousins, Esq.  
Ann M. Kashishian, Esq.  
Lewis Brisbois Bisgaard & Smith LLP  
500 Delaware Ave., Suite 700  
Wilmington, DE 19801

*Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. v. Controladora Dolphin, SA de CV, et al.*  
Adv. Pro. No. 25-51024 (LSS)

The Prudential Insurance Company of America  
c/o Paul J. Keenan Jr., Esq.  
John R. Dodd, Esq.  
Kevin Whittam, Esq.  
Blaire Cahn, Esq.  
Baker & McKenzie LLP  
830 Brickell Plaza, Suite 3100  
Miami, FL 33131

The Prudential Insurance Company of America  
c/o Kathleen M. Gibson  
751 Broad Street  
Newark, NJ 07102

The Prudential Insurance Company of America  
Chief Financial Officer, Registered Agent  
P O Box 6200 (32314-6200)  
200 E. Gaines St  
Tallahassee, FL 32399-0000

*Defendant, Prudential Legacy Insurance Company of New Jersey:*

Prudential Legacy Ins. Co. of New Jersey  
Attn: President, CEO or other Officer or Agent  
Prudential Tower  
655 Broad Street, 17<sup>th</sup> Floor – South Tower  
Newark, NJ 07102

Prudential Legacy Ins. Co. of New Jersey  
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Ann M. Kashishian, Esq.  
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500 Delaware Ave., Suite 700  
Wilmington, DE 19801

Prudential Legacy Ins. Co. of New Jersey  
c/o Paul J. Keenan Jr., Esq.  
John R. Dodd, Esq.  
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830 Brickell Plaza, Suite 3100  
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Prudential Legacy Ins. Co. of New Jersey  
Attn: President, CEO or other Officer or Agent  
751 Broad Street  
Newark, NJ 07102

Prudential Legacy Ins. Co. of New Jersey  
Attn: President, CEO or other Officer or Agent  
901 Fifth Avenue, Suite 1200  
Seattle, WA 98164

*Defendant, Cigna Health and Life Insurance Company:*

Cigna Health and Life Insurance Company  
Attn: President, CEO or other Officer or Agent  
900 Cottage Grove Road  
Blomfield, CT 06002

Cigna Health and Life Insurance Company  
c/o Scott D. Cousins, Esq.  
Ann M. Kashishian, Esq.  
Lewis Brisbois Bisgaard & Smith LLP  
500 Delaware Ave., Suite 700  
Wilmington, DE 19801

*Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. v. Controladora Dolphin, SA de CV, et al.*  
Adv. Pro. No. 25-51024 (LSS)

Cigna Health and Life Insurance Company  
c/o Paul J. Keenan Jr., Esq.  
John R. Dodd, Esq.  
Kevin Whittam, Esq.  
Blair Cahn, Esq.  
Baker & McKenzie LLP  
830 Brickell Plaza, Suite 3100  
Miami, FL 33131

Cigna Health and Life Insurance Company  
Attn: President, CEO or other Officer or Agent  
1601 Chestnut Street  
Two Liberty Place  
Philadelphia, PA 19192

Cigna Health and Life Insurance Company  
c/o CT Corporation System. Registered Agent  
1200 South Pine Island Road  
Plantation, FL 33324

Cigna Health and Life Insurance Company  
c/o Chief Financial Officer  
200 E. Gaines St.  
Tallahassee, FL 32399-0000