

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. 402

Objection Deadline:
October 3, 2025 at 4:00 p.m. (ET)

**NOTICE OF EXECUTORY CONTRACTS AND UNEXPIRED
LEASES THAT MAY POTENTIALLY BE ASSUMED AND ASSIGNED
IN CONNECTION WITH THE SALE OF THE DEBTORS' ASSETS
AND THE PROPOSED CURE COSTS WITH RESPECT THERETO**

YOU ARE RECEIVING THIS NOTICE (THIS “*NOTICE OF POTENTIAL ASSUMPTION AND ASSIGNMENT*”)² BECAUSE YOU MAY BE A COUNTERPARTY TO AN EXECUTORY CONTRACT OR UNEXPIRED LEASE WITH ONE OR MORE OF THE DEBTORS THAT MAY BE ASSUMED PURSUANT TO CERTAIN ASSET SALE PROCEDURES, AS DETAILED BELOW. PLEASE READ THIS NOTICE CAREFULLY AS YOUR RIGHTS MAY BE AFFECTED BY THE TRANSACTIONS DESCRIBED HEREIN.

PLEASE TAKE NOTICE that on July 29, 2025, the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”) entered an order [Docket No. 402] (the “**Bidding Procedures Order**”) approving the motion [Docket No. 299] (the “**Bidding**

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.

² This Notice of Potential Assumption and Assignment is subject to the terms and conditions of the Bidding Procedures Order (as defined below), with such Bidding Procedures Order controlling in the event of any conflict. The Debtors encourage parties-in-interest to review the Bidding Procedures Order and any related documents in their entirety. Parties with questions regarding the Assumption and Assignment Procedures (as defined below) should contact the Debtors’ counsel at the contact information provided herein and may wish to seek the advice of legal counsel.



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Procedures Motion)³ of the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) and thereby establishing, among other things: (i) bidding procedures (the “**Bidding Procedures**”) by which the Debtors will solicit and select the highest or otherwise best offer for the sale of substantially all or a portion of their assets (the “**Assets**”), free and clear of all liens, claims, interests, and encumbrances, through one or more sales of the Assets (each, a “**Sale Transaction**” or “**Sale**”); (ii) procedures for the assumption and assignment of executory contracts and unexpired leases, including notice of proposed cure amounts (the “**Assumption and Assignment Procedures**”); (iii) approving the form and manner of notice with respect to certain procedures, protections, schedules, and agreements described herein and attached hereto, including the Debtors’ selection of one or more stalking horse bidders (each a “**Stalking Horse Bidder**”), if any, and the provision of Bid Protections to such Stalking Horse Bidder(s), if necessary; (iv) scheduling (a) an auction if the Debtors receive one or more timely and acceptable Qualified Bids and (b) a final hearing or hearings to approve one or more Sales of the Assets; and (v) granting related relief.

PLEASE TAKE FURTHER NOTICE that on September 5, 2025, the Debtors filed the *Notice of Proposed Sale, Bidding Procedures, Auction, and Sale Hearing* [Docket No. 512] regarding the sale of the following (collectively, the “**Other Florida Assets**” and the sale(s) thereof, the “**Other Florida Assets Sale Transaction(s)**”): (i) the assets and operations located at 61 Hawks Cay Blvd., Duck Key, FL 33050; (ii) the assets and operations located at 9600 Oceanshore Blvd., St Augustine, FL 32080; and (iii) the assets located at 15412 Front Beach Rd., Panama City Beach, FL 32413.

PLEASE TAKE FURTHER NOTICE that, as noted above, the Bidding Procedures Order established procedures for the assumption and assignment of certain executory contracts and unexpired leases (including without limitation any and all amendments, modifications, side letters, memoranda of understanding, documents incorporated by reference, attachments, and exhibits thereto) that the Debtors believe they may seek to assume and assign in connection with the Other Florida Assets Sale Transaction(s) (collectively, the “**Designated Contracts**”) to a purchaser or purchasers and the determination of related Cure Costs (as defined below). The Debtors are parties to numerous Designated Contracts and, in accordance with the Bidding Procedures Order, hereby file this Notice of Potential Assumption and Assignment identifying (i) the Designated Contracts, which may be assumed and assigned to a Successful Bidder in connection with the Other Florida Assets Sale Transaction(s) and (ii) the proposed amounts, if any, the Debtors believe are owed, as of the date of this Notice of Potential Assumption and Assignment, to the counterparties to the Designated Contracts to cure any defaults or arrears existing under the Designated Contracts (such amounts, the “**Cure Costs**”), as set forth on Exhibit 1 attached hereto (the “**Designated Contracts List**”). Other than the Cure Costs listed on the Designated Contracts List, the Debtors are not aware of any amounts due and owing under the Designated Contracts. To the extent that the Debtors satisfy any portion of the Cure Costs subsequent to the filing of this Notice of Potential Assumption and Assignment, the Cure Costs shall be reduced accordingly.

³ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Bidding Procedures Motion.

PLEASE TAKE FURTHER NOTICE that the hearing to approve the Other Florida Assets Sale Transaction(s) (the “**Sale Hearing**”) is currently scheduled be held on **October 27, 2025 at 2:00 p.m. (prevailing Eastern Time)** before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19081. The Sale Hearing may be adjourned from time to time without further notice other than the filing of an agenda on the docket of the Chapter 11 Cases informing parties of same. Any adjourned hearing dates will be available on the electronic docket of the Chapter 11 Cases or on the Debtors’ case website: <https://veritaglobal.net/dolphinco>.

PLEASE TAKE FURTHER NOTICE that the listing of a Designated Contract on the Designated Contracts List does not constitute an admission that any Designated Contract is an executory contract or unexpired lease as contemplated by section 365(a) of the Bankruptcy Code or that the Debtors have any liability thereunder, and the Debtors expressly reserve all of their rights, claims, causes of action, and defenses with respect to the Designated Contracts listed on the Designated Contracts List and any supplement(s) thereto.

PLEASE TAKE FURTHER NOTICE that to the extent a counterparty to a Designated Contract objects to the proposed assumption and assignment of an applicable Designated Contract or the proposed Cure Costs, if any, such counterparty must file and serve an objection (a “**Designated Contract Objection**”), in accordance with the Bidding Procedures Order and this Notice of Potential Assumption and Assignment, not later than **October 3, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the “**Assignment and Assumption Objection Deadline**”). Any Designated Contract Objection must (i) state, with specificity, the legal and factual basis for the objection, including any asserted Cure Costs, if any, (ii) include appropriate documentation in support thereof, and (iii) be filed and served on the following (the “**Objection Recipients**”): (a) counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, 1000 N. King Street, Wilmington, DE 19801, Attn: Sean T. Greecher (sgreecher@ycst.com) and Jared W. Kochenash (jkochenash@ycst.com); (b) the Office of the United States Trustee for the District of Delaware, 844 King Street, Room 2207, Lockbox 35, Wilmington, DE 19801, Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov); (c) counsel to the Official Committee of Unsecured Creditors, (x) Raines Feldman Littrell LLP, 824 North Market Street, Suite 805, Wilmington, DE 19801, Attn: Thomas J. Francella, Jr. (tfrancella@raineslaw.com) and (y) Law Offices of Manganelli, Leider & Savio, P.A., 1900 N.W. Corporate Blvd., Ste. 200W, Boca Raton, FL 33431, Attn: Christian Savio (csavio@mls-pa.com); (d) counsel to the DIP Lenders, Baker & McKenzie LLP, 830 Brickell Plaza, Suite 3100, Miami, FL 33131, Attn: Paul J. Keenan Jr. (paul.keenan@bakermckenzie.com), and 452 Fifth Avenue, New York, New York 10018, Attn: Blaire A. Cahn (blaire.cahn@bakermckenzie.com); (e) the DIP Agent, GLAS Americas, LLC, 3 Second Street, Suite 206 Jersey City, NJ 07311, Re: Triton Investments Holdings, LLC (clientservices.usadcm@glas.agency); (f) counsel to the DIP Agent, the Prepetition First Lien Agent, and the Prepetition Second Lien Agent, Foley & Lardner LLP, 111 Huntington Avenue, Suite 2500, Boston, MA 02199, Attn: Adrienne K. Walker (awalker@foley.com); (g) the Prepetition First Lien Agent and the Prepetition Second Lien Agent, GLAS Americas, LLC, 3 Second Street, Suite 206 Jersey City, NJ 07311; Attn: Controladora Dolphin, S.A. de C.V.-Collateral Agent (clientservices.usadcm@glas.agency); and (h) all parties that have requested notice in the Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE THAT IF A COUNTERPARTY TO A DESIGNATED CONTRACT FILES A DESIGNATED CONTRACT OBJECTION, AND THE PARTIES ARE UNABLE TO CONSENSUALLY RESOLVE THE DISPUTE PRIOR TO THE SALE HEARING, THE AMOUNT TO BE PAID OR RESERVED WITH RESPECT TO SUCH OBJECTION WILL BE DETERMINED AT THE SALE HEARING, SUCH LATER HEARING DATE THAT THE DEBTORS DETERMINE IN THEIR DISCRETION, OR SUCH OTHER DATE DETERMINED BY THE BANKRUPTCY COURT. ALL OTHER OBJECTIONS TO THE PROPOSED ASSUMPTION AND ASSIGNMENT OF THE DEBTORS' RIGHT, TITLE, AND INTEREST IN, TO, AND UNDER THE DESIGNATED CONTRACTS WILL BE HEARD AT THE SALE HEARING.

PLEASE TAKE FURTHER NOTICE that any counterparty to a Designated Contract shall, upon request to the Debtors' counsel, be provided with Adequate Assurance Information (as defined in the Bidding Procedures) relevant to the affected counterparty as soon as practicable after it is received by the Debtors. Any party requesting such Adequate Assurance Information shall have (i) with respect to any Stalking Horse Bidder, the later of (a) **October 6, 2025 at 4:00 p.m. (prevailing Eastern Time)** and (b) **the date that is seven (7) days after receipt of the Stalking Horse Bidder's Adequate Assurance Information**, or (ii) with respect to any other Bidder, **October 16, 2025 at 4:00 p.m. (prevailing Eastern Time)**, to object on the basis of any Adequate Assurance Information that is provided.

PLEASE TAKE FURTHER NOTICE that if a counterparty to a Designated Contract does not timely file and serve a Designated Contract Objection in accordance with the Bidding Procedures Order and this Notice of Potential Assumption and Assignment, such counterparty will be deemed to have consented to the assumption and assignment of such party's Designated Contract to a Successful Bidder, notwithstanding any anti-alienation provision or other restriction on assumption or assignment in the Designated Contract, and may be forever barred from asserting any objection with regard to such assumption and assignment and/or Cure Costs set forth on the Designated Contracts List.

PLEASE TAKE FURTHER NOTICE that although the Debtors have made a good-faith effort to identify all Designated Contracts that might be assumed and assigned in connection with the Other Florida Assets Sale Transaction(s), the Debtors may discover certain additional contracts inadvertently omitted from the Designated Contracts List or one or more Successful Bidder(s) may identify other executory contracts or unexpired leases that they desire to assume and assign in connection with the Other Florida Assets Sale Transaction(s). Accordingly, the Debtors reserve the right to (i) supplement the Designated Contracts List, (ii) remove a Designated Contract from any list of contracts ultimately selected as a Designated Contract that a Successful Bidder proposes be assumed and assigned to it in connection with the Other Florida Assets Sale Transaction(s), and/or (iii) modify, with notice to any affected counterparty, the previously stated Cure Cost(s) associated with any Designated Contract.

PLEASE TAKE FURTHER NOTICE that, in the event that the Debtors supplement the Designated Contracts List with additional Designated Contracts or propose to modify any Cure Costs, the Debtors will promptly file and thereafter serve a supplemental notice (a "**Supplemental Notice of Assumption and Assignment**") to each affected counterparty at the last known address available to the Debtors in accordance with the Bidding Procedures Order.

PLEASE TAKE FURTHER NOTICE that the inclusion of a Designated Contract on the Designated Contracts List (or any supplement thereto) will not obligate the Debtors to assume any Designated Contract or the Successful Bidder(s) to take assignment of such Designated Contract. Only those Designated Contracts that are ultimately selected for assumption and assignment in accordance with any applicable Other Florida Assets Sale Transaction will be assumed and assigned to the Successful Bidder(s).

Dated: September 19, 2025

/s/ Jared W. Kochenash

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Counsel to the Debtors and Debtors in Possession

Exhibit 1

Designated Contracts List

Exhibit A:
Assumed Contracts

	Counterparty	Counterparty Address	Debtor Counterparty	Contract Description	Cure Cost
1	Alexandria Stewart	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
2	Antech Diagnostics, Inc.	17620 Mount Herrmann Street, Fountain Valley, CA 92708, United States	Marineland Leisure Inc.	Extended Warranty Agreement and Premier Sound Assurance Service	\$0.00
3	Ashly Kocher	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
4	Bree Davy	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
5	Brian Wortelboer	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
6	Bridget Waller	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
7	Brittney Duell	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
8	Caitlin Rose	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
9	Charles Buttner	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
10	Christian Saltarin	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
11	Chrysler Capital	3000 Kellway Drive, Suite 120, Carrollton, TX 75006	The Dolphin Connection, Inc.	Vehicle Lease	\$0.00
12	Clearwater Marine Aquarium	249 Windward Passage, Clearwater, FL 33767	Gulf World Marine Park, Inc.	Animal Transfer and Loan Agreement	\$0.00
13	Courtney Jackson	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
14	Dawn Stokka	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
15	Emily Hattory	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
16	Emily Mollica	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
17	Emmalee Speer	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
18	EVHC	145 W Ostend St 2nd floor, Baltimore, MD 21230	The Dolphin Connection, Inc.	Welfare Benefit Plan	\$0.00
19	EVHC	145 W Ostend St 2nd floor, Baltimore, MD 21230	Marineland Leisure Inc.	Welfare Benefit Plan	\$0.00
20	FareHarbor	1700 Broadway #1010, Denver, CO 80290	The Dolphin Connection, Inc.	Software Agreement	\$0.00
21	Felicia MacQuarrie	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
22	Florida Power & Light Company	700 Universe Blvd. Juno Beach, FL 33408-0420	Marineland Leisure Inc.	Utilities Agreement	\$0.00
23	Gabrielle Gilreath	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
24	Garry Stacks	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
25	Hildenberg Gualberto	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
26	Iris Smith	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
27	Jadon Stuart	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
28	Jaime Burdick	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
29	JDI Marineland, LLC	8200 Roberts Dr, Ste 200, Atlanta, GA 30350	Marineland Leisure Inc.	Utilities Agreement	\$0.00
30	Jessie Suarez	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
31	Joanna Lott	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
32	Joseph Maples	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
33	Joseph Paulton	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
34	Kathleen Newton	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
35	Keith Flynn	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
36	Kelly Fischbach	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
37	Kenneth Rodriguez	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
38	Keys Hotel Operator LLC	61 Hawks Cay Blvd, Duck Key FL 33050 USA	The Dolphin Connection, Inc.	Preferential Food Pricing Contract	\$0.00
39	Keys Hotel Operator LLC	61 Hawks Cay Blvd, Duck Key FL 33050 USA	The Dolphin Connection, Inc.	License Agreement	\$167,375.19
40	Keys Hotel Operator LLC	61 Hawks Cay Blvd, Duck Key FL 33050 USA	The Dolphin Connection, Inc.	Food Service Agreement	\$0.00
41	Logan Schindehette	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
42	Madison Dobson	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
43	Malcolm Gaskill	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00

	Counterparty	Counterparty Address	Debtor Counterparty	Contract Description	Cure Cost
44	McKenzie Cantrell	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
45	Melissa Busca	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
46	Michael Briggs Veterinary Consultancy	[redacted]	The Dolphin Connection, Inc.	Consulting Services Contract	\$0.00
47	Miguel Alpizar	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
48	Olivia Mott	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
49	Paymaster Payroll Services	4801 Glenwood Ave Ste 200, Raleigh, North Carolina, 27612	The Dolphin Connection, Inc.	Software Services Agreement	\$0.00
50	Paymaster Payroll Services	4801 Glenwood Ave Ste 200, Raleigh, North Carolina, 27612	Marineland Leisure Inc.	Software Services Agreement	\$0.00
51	Parker Bryant	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
52	Progressive Insurance	300 North Commons Blvd., Mayfield Village, Ohio 44143	The Dolphin Connection, Inc.	Automobile Insurance	\$0.00
53	Richard Pacheco	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
54	Robert McCrossen	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
55	RocketRez Inc.	418 B Main Street, Steinbach MB R5G 1Z USA	Marineland Leisure Inc.	Software Services Agreement	\$0.00
56	Roque Velarde Padilla	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
57	Ryan Kernon	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
58	Samantha Fisher	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
59	Samantha MacFarlane	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
60	Samantha Marcano	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
61	Shanda Wyatt	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
62	Shawna Freyberg-Bach	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
63	Shelby Velarde	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
64	SouthEast Personnel Leasing, Inc.	2739 US-19, Holiday, FL 34691	Gulf World Marine Park, Inc.	Professional Employer Organization Services	\$0.00
65	SouthEast Personnel Leasing, Inc.	2739 US-19, Holiday, FL 34691	The Dolphin Connection, Inc.	Professional Employer Organization Services	\$0.00
66	SouthEast Personnel Leasing, Inc.	2739 US-19, Holiday, FL 34691	Marineland Leisure Inc.	Professional Employer Organization Services	\$0.00
67	Stefanie Breneman	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
68	Sunbelt Rentals, Inc.	1799 Innovation Pt Fort Mill, South Carolina 29715	Marineland Leisure Inc.	Equipment Lease	\$1,975.73
69	Sydney Herman	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
70	Sydney Messick	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
71	Sydney Reilly	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
72	Tess Shacknow	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
73	Tianna Betz	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
74	Tom Sackmaster	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
75	Valerie Bliler	[redacted]	The Dolphin Connection, Inc.	Employment Services Contract	\$0.00
76	Victoria Macaluso	[redacted]	Marineland Leisure Inc.	Employment Services Contract	\$0.00
77	Waste Management, Inc.	800 Capitol, Suite 3000 Houston, TX 77002	Gulf World Marine Park, Inc.	Waste Collection, Transport and Removal Contract	\$0.00
78	Waste Management, Inc.	800 Capitol, Suite 3000 Houston, TX 77002	The Dolphin Connection, Inc.	Waste Collection, Transport and Removal Contract	\$0.00
79	Waste Management, Inc.	800 Capitol, Suite 3000 Houston, TX 77002	Marineland Leisure Inc.	Waste Collection, Transport and Removal Contract	\$0.00