

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

In re

Leisure Investments Holdings LLC, *et al.*,

Debtors.

Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd.

Plaintiff,

v.

Controladora Dolphin, SA de CV, *et al.*,

Defendants.

Chapter 11

Case No. 25-10606 (LSS)

Joint Administration Pending

Adv. Proc. No. 25-51024 (LSS)

**CERTIFICATION OF COUNSEL REGARDING
ORDER APPROVING STIPULATION FOR EXTENSION OF TIME**

On June 18, 2025, Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. (the “Plaintiff”), filed a complaint [Adv. Docket No. 1] (the “Complaint”) in the above-captioned matter against Controladora Dolphin, SA de CV, Dolphin Leisure, Inc., Glas Americas LLC, as administrative agent, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (collectively, the “Defendants” and together with the Plaintiff, the “Parties”).

Following the filing of the Complaint, the Parties conferred and agreed to extend the time within which the Defendants must answer or otherwise respond to the Complaint, as set forth in the *Stipulation Extending Time to Respond to Complaint*, attached as **Exhibit A** to the proposed form of order attached hereto (the “Order”).



The parties hereby respectfully request that the Court enter the Order at its earliest convenience.

Dated: October 10, 2025

/s/ Ann M. Kashishian

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

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

ORDER APPROVING STIPULATION FOR EXTENSION OF TIME

Upon consideration of the *Certification of Counsel Regarding Order Approving Stipulation for Extension of Time*, it is hereby:

ORDERED that the Stipulation attached here as **Exhibit A** is approved; and it is further

ORDERED that the time within which the Defendants must answer or otherwise respond to the Complaint in the above-captioned adversary proceeding is extended through and including October 28, 2025 (the “Response Deadline”); and it is further

ORDERED that the Parties’ pretrial conference set for October 27, 2025 shall be continued to a date following resolution by the Court of any motion to dismiss filed on or before the Response Deadline.

EXHIBIT A

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

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

STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT

Plaintiff Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. (the “Plaintiff”) and Defendants Controladora Dolphin, SA de CV, Dolphin Leisure, Inc., GLAS Americas LLC, as collateral agent, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company, (the “Defendants,” and, together with Plaintiff, the “Parties”) jointly submit this stipulation to extend the time for Defendants to answer or otherwise respond to Plaintiff’s complaint in the above captioned adversary proceeding, and in support thereof state as follows:

WHEREAS, on June 18, 2025, Plaintiff filed a complaint (the “Complaint”) in the above-captioned adversary proceeding (the “*Tradewinds* Action”) against Defendants to determine the validity, priority, and extent of its liens on Controladora Dolphin, SA de CV’s (“Controladora”) property, including the assets of Chapter 11 debtor Dolphin Leisure, Inc. and its subsidiaries.

WHEREAS, the *Tradewinds* Action is an adversary proceeding within the bankruptcy action captioned *In re Leisure Investments Holdings, LLC*, No. 25-10606 (LSS) (the “*Leisure* Action”);

WHEREAS, on September 12, 2025, the Court issued a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* setting a pretrial conference in the *Tradewinds* Action for October 27, 2025 [Adv. Docket No. 3];

WHEREAS, the Parties have made no prior requests to extend or modify the schedule for Defendants' response to the Complaint;

WHEREAS, this stipulation including the filing of same is not a waiver of any of the Parties' rights, remedies, claims, or defenses.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their undersigned counsel, and subject to the approval of the Court, that:

1. Defendants shall have through and including October 28, 2025¹ to respond or answer the Complaint (the "Response Deadline"); and
2. The Parties' pretrial conference set for October 27, 2025 is continued to a date following resolution of any motion to dismiss filed on or before the Response Deadline").

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¹ October 13, 2025 is a federal holiday; accordingly, the current deadline to answer or respond to the Complaint is October 14, 2025. *See* Fed. R. Bankr. R. 9006(a)(1)(c).

Dated: October 10, 2025

By: /s/ Ann M. Kashishian

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