

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

In re:

LEISURE INVESTMENTS HOLDINGS LLC,  
*et al.*,  
Debtors.

Chapter 11

Case No. 25-10606 (LSS)

TRADEWINDS, LTD., d/b/a TRADEWINDS  
CONSULTING, LTD.,

Plaintiff,

vs.

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

CONTROLADORA DOLPHIN, SA de CV,  
DOLPHIN LEISURE, INC., GLAS  
AMERICAS LLC, as Administrative Agent,  
THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA, PRUDENTIAL  
LEGACY INSURANCE COMPANY OF  
NEW JERSEY and CIGNA HEALTH AND  
LIFE INSURANCE COMPANY,

Defendants.

**DEFENDANT GLAS AMERICAS LLC'S MOTION TO DISMISS THE COMPLAINT**

GLAS Americas LLC's ("GLAS") hereby files this motion to dismiss (the "Motion to Dismiss") the complaint (the "Complaint") filed in the above-captioned adversary proceeding. The Motion to Dismiss is filed pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, incorporated herein by Rule 7012 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

Pursuant to Bankruptcy Rule 7012(b) and Rule 7012-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware, GLAS does not consent to the entry of a final order or judgment by the Court in connection with the Complaint to the extent that (i) any

matter is non-core or, (ii) absent consent of the parties, the Court cannot enter final orders or judgements in connection herewith consistent with Article III of the United States Constitution.

For the reasons set forth in the accompanying *GLAS Americas LLC's Memorandum of Law in Support of the Motion to Dismiss the Complaint Pursuant to Fed. R. Civ. P. 12(b)* (the "Brief"), GLAS respectfully requests that the Court issue an Order in the form attached hereto as **Exhibit A**, (a) granting this Motion to Dismiss and dismissing the Complaint filed in this adversary proceeding as to GLAS; and (b) granting such other and further relief as this Court may deem just and appropriate.

Dated: October 28, 2025

By: /s/ Evelyn J. Meltzer

Evelyn J. Meltzer (DE No. 4581)

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*Counsel for GLAS Americas LLC, as collateral agent*

**EXHIBIT A**

**PROPOSED ORDER**

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DOLPHIN LEISURE, INC., GLAS  
AMERICAS LLC, as Administrative Agent,  
THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA, PRUDENTIAL  
LEGACY INSURANCE COMPANY OF  
NEW JERSEY and CIGNA HEALTH AND  
LIFE INSURANCE COMPANY,

Defendants.

**ORDER GRANTING GLAS AMERICAS LLC'S MOTION  
TO DISMISS THE COMPLAINT**

This matter having come before the Court on *Defendant GLAS Americas LLC's Motion to Dismiss the Complaint* (the "Motion to Dismiss");<sup>1</sup> and the Court having reviewed the Motion to Dismiss and the related briefing; and the Court finding that the legal and factual bases set forth in the Motion to Dismiss and related briefing establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion to Dismiss, the Complaint and/or the Brief.

1. The Motion to Dismiss is **GRANTED** as set forth herein.
2. The Complaint in Adv. Pro. No. 25-51024 (LSS) is **DISMISSED** as to GLAS Americas LLC.
3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**CERTIFICATE OF SERVICE**

I, Evelyn J. Meltzer, hereby certify that on the 28<sup>th</sup> of October 2025, I caused the foregoing to be served upon the parties set forth below, in the manner indicated; and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

<p><b><u>By Email and First-Class Mail</u></b>  <i>(Counsel for Tradewinds Consulting, Ltd)</i>  William D. Sullivan and William A. Hazeltine  <b>SULLIVAN HAZELTINE ALLINSON LLC</b>  919 North Market Street, Suite 20  Wilmington DE 19801  <a href="mailto:bsullivan@sha-llc.com">bsullivan@sha-llc.com</a>  <a href="mailto:whazeltine@sha-llc.com">whazeltine@sha-llc.com</a></p>	<p><b><u>By Email and First-Class Mail</u></b>  <i>(Counsel for Tradewinds Consulting, Ltd)</i>  J. Andrew Fine  <b>FINECOUNSEL</b>  115 E. Main Street, Suite A  Durham, North Carolina 27707  <a href="mailto:jaf@finecounsel.law">jaf@finecounsel.law</a></p>
<p><b><u>By Email</u></b>  <i>(Counsel for Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company)</i>  Scott D. Cousins and Ann M. Kashishian  <b>LEWIS BRISBOIS BISGAARD &amp; SMITH LLP</b>  500 Delaware Avenue, Suite 700  Wilmington, DE 19801  <a href="mailto:scott.cousins@lewisbrisbois.com">scott.cousins@lewisbrisbois.com</a>  <a href="mailto:ann.kashishian@lewisbrisbois.com">ann.kashishian@lewisbrisbois.com</a></p>	<p><b><u>By Email</u></b>  <i>(Counsel for Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company)</i>  Paul J. Keenan Jr., John R. Dodd, Kevin Whittam, Blaire Cahn, and Benjamin Davis  <b>BAKER &amp; MCKENZIE LLP</b>  830 Brickell Plaza, Suite 3100  Miami, Florida 33131  <a href="mailto:paul.keenan@bakermckenzie.com">paul.keenan@bakermckenzie.com</a>  <a href="mailto:John.dodd@bakermckenzie.com">John.dodd@bakermckenzie.com</a>  <a href="mailto:kevin.whittam@bakermckenzie.com">kevin.whittam@bakermckenzie.com</a>  <a href="mailto:Blair.cahn@bakermckenzie.com">Blair.cahn@bakermckenzie.com</a>  <a href="mailto:benjamin.davis@bakermckenzie.com">benjamin.davis@bakermckenzie.com</a></p>
<p><b><u>By Email</u></b>  <b>YOUNG CONAWAY STARGATT &amp; TAYLOR, LLP</b>  Robert S. Brady, Sean T. Greecher, Michael S. Neiburg, Allison S. Mielke, and Jared W. Kochenash (No. 6557)  Rodney Square  1000 North King Street  Wilmington, DE 19801  <a href="mailto:rbrady@ycst.com">rbrady@ycst.com</a>; <a href="mailto:sgreecher@ycst.com">sgreecher@ycst.com</a>;  <a href="mailto:mneiburg@ycst.com">mneiburg@ycst.com</a> <a href="mailto:amielke@ycst.com">amielke@ycst.com</a>;  <a href="mailto:jkochenash@ycst.com">jkochenash@ycst.com</a></p>	

/s/ Evelyn J. Meltzer  
Evelyn J. Meltzer (DE No. 4581)