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,

vs.

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.

Chapter 11

Case No. 25-10606 (LSS)

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

MOTION AND ORDER FOR ADMISSION PRO HAC VICE OF MICHELLE N. SANEY

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves the admission pro hac vice of Michelle N. Saney, Esq., of Foley & Lardner LLP to represent GLAS Americas LLC as the first lien and second lien collateral agent in the above-captioned cases and any adversary proceedings related thereto.

Dated: October 28, 2025 By: <u>/s/ Evelyn J. Meltzer</u>

Evelyn J. Meltzer (DE No. 4581)

TROUTMAN PEPPER LOCKE LLP

Hercules Plaza. Suite 1000

1313 N. Market Street, P.O. Box 1799

Wilmington, DE 19899-1709

Telephone: (302) 777-6500

Email: evelyn.meltzer@troutman.com

Counsel for GLAS Americas LLC



CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE

Pursuant to Rule 9010-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, I certify that I am eligible for admission to this Court, am admitted, practicing, and in good standing as a member of the Bar of the State of New York, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 12/21/23. I further certify that the fee of \$50.00 has been paid to the Clerk of Court for District Court.

Dated: October 28, 2025 By: /s/ Michelle N. Saney

Michelle N. Saney

FOLEY & LARDNER LLP

90 Park Avenue New York, NY 10016

Telephone: (212) 338-3435

Email: michelle.saney@foley.com

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.