

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

Chapter 11

LEISURE INVESTMENTS
HOLDINGS LLC, *et al.*,¹

Case No. 25-10606 (LSS)

Jointly Administered

Debtors.

**DIP LENDERS' AND PREPETITION FIRST LIEN NOTEHOLDERS' JOINDER TO
(I) DEBTORS' REPLY IN SUPPORT OF THE PROPOSED SALE OF THE DEBTORS'
REAL PROPERTY LOCATED AT 9600 N. OCEANSHORE BLVD., FLAGLER
COUNTY, FLORIDA, AND (II) DEBTORS' REPLY IN SUPPORT OF THE
PROPOSED ANIMAL TRANSFER AGREEMENT AND THE SALE OF
CERTAIN ANIMALS, FREE AND CLEAR OF LIENS, CLAIMS,
INTERESTS, AND ENCUMBRANCES**

The Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (collectively, the “**DIP Lenders**” or “**Prepetition First Lien Noteholders**”), by and through their undersigned counsel, hereby file this joinder (the “**Joinder**”) to join in and adopt the arguments submitted by the Debtors in (i) *Debtors' Reply in Support of the Proposed Sale of the Debtors' Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, Florida* [ECF No. [701], and (ii) *Debtors' Reply in Support of the Proposed Animal Transfer Agreement and the Sale of Certain Animals, Free and Clear of Liens, Claims, Interests, and Encumbrances* [ECF No. [702] (collectively, the “**Replies**”). In support of this Joinder, the DIP Lenders respectfully state as follows:

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.



1. The DIP Lenders expressly join, adopt, and incorporate the Debtors' arguments set forth in the Replies, and respectfully request that this Court approve the Proposed Sale and Proposed Transfer as defined in the Replies.

2. The DIP Lenders expressly reserve all rights with respect to the Replies, including the right to supplement and amend this Joinder at any time and to present any other arguments at any hearing on the matters.

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Dated: November 5, 2025
Wilmington, Delaware

/s/ Scott D. Cousins

Scott D. Cousins (#3079)

Ann M. Kashishian (#5622)

LEWIS BRISBOIS BISGAARD & SMITH LLP

500 Delaware Ave., Suite 700

Wilmington, DE 19801

Phone: (302) 985-6000

Email: scott.cousins@lewisbrisbois.com

ann.kashishian@lewisbrisbois.com

-and-

Paul J. Keenan Jr. (admitted *pro hac vice*)

John R. Dodd (admitted *pro hac vice*)

Kevin Whittam (admitted *pro hac vice*)

Blaire A. Cahn (admitted *pro hac vice*)

BAKER & MCKENZIE LLP

830 Brickell Plaza, Suite 3100

Miami, FL 33131

Phone: (305) 789-8900

Email: paul.keenan@bakermckenzie.com

john.dodd@bakermckenzie.com

kevin.whittam@bakermckenzie.com

blaire.cahn@bakermckenzie.com

*Counsel to the DIP Lenders and Prepetition First
Lien Noteholders*