

**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 Nos. 299, 402, 512, 582, 603

**DEBTORS' WITNESS LIST FOR HEARING SET FOR
NOVEMBER 10, 2025 AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Leisure Investments Holdings LLC and certain of its affiliates (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases hereby submit this witness list identifying the witnesses that the Debtors intend to present in connection with the hearing currently scheduled on November 10, 2025 at 11:00 a.m. (prevailing Eastern Time) (the “**Hearing**”).

WITNESSES

The Debtors may elicit testimony from the following individuals at the Hearing:

1. **Robert Wagstaff**

The Debtors will offer by declaration the testimony of Mr. Robert Wagstaff. Specifically, the Debtors will introduce into evidence the *Declaration of Robert Wagstaff in Support of the Proposed Transfer of Certain Animals Located at Marineland* [Docket No. 707] and the *Declaration of Robert Wagstaff in Support of the Proposed Sale of the Marineland Property (9600 N. Oceanshore Blvd., Flagler County, Florida)* [Docket No. 706].

¹ Due to the large number of debtors in these chapter 11 cases, which are being jointly administered, 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.



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The Debtors also anticipate offering supplemental in-person direct examination of Mr. Wagstaff at the Hearing.

2. **Jakub Mleczko**

The Debtors will offer by declaration the testimony of Mr. Jakub Mleczko. Specifically, the Debtors will introduce into evidence the *Declaration of Jakub Mleczko in Support of the (1) Proposed Sale of the Marineland Property to Delightful Development LLC, and (2) Transfer of Certain Animals to Theater of the Sea, Inc.* [Docket No. 705]. The Debtors may also offer supplemental in-person direction examination of Mr. Mleczko at the Hearing.

3. **Harold J. Bordwin**

The Debtors will offer by declaration the testimony of Mr. Harold J. Bordwin. Specifically, the Debtors will introduce into evidence the *Declaration of Harold J. Bordwin in Support of the Proposed Sale of the Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, Florida* [Docket No. 703]. The Debtors may also offer supplemental in-person direction examination of Mr. Bordwin at the Hearing.

4. **Craig Cavileer**

The Debtors will offer by declaration the testimony of Mr. Craig Cavileer. Specifically, the Debtors will introduce into evidence the *Declaration of Craig Cavileer in Support of the Proposed Sale of the Debtors' Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, FL 32080* [Docket No. 635].

5. **Hugh Jackson**

The Debtors will offer by declaration the testimony of Mr. Hugh Jackson. Specifically, the Debtors will introduce into evidence the *Declaration of Hugh Jackson in Support of the Proposed*

Sale of Certain Animals, Free and Clear of Liens, Claims, Interests, and Encumbrances [Docket No. 633].

PLEASE TAKE FURTHER NOTICE THAT the Debtors reserve their rights to (a) call any witness identified by any other party in connection with the Hearing; (b) call any witnesses necessary to rebut the testimony of any witness called or designated by any other party; and/or (c) offer the live or proffered testimony of the above-listed witnesses. Further, the Debtors reserve their rights to amend or supplement this list at, or in advance of, the Hearing.

Dated: November 7, 2025

/s/ Sean T. Greecher

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