

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

LEISURE INVESTMENTS HOLDINGS LLC,  
*et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

**NOTICE OF AMENDED<sup>2</sup> AGENDA FOR HEARING OF MATTERS  
SCHEDULED FOR NOVEMBER 12, 2025 AT 10:00 A.M. (ET)**

**All hearings before Judge Silverstein are in person.**

**Parties may observe the hearing remotely by registering with the Zoom link below no later than 4:00 p.m. (ET) the business day before the scheduled hearing.**

**To attend this hearing remotely, please register using the eCourtAppearances tool ([available here](#) or on the Court's website <https://ecf.deb.uscourts.gov/cgi-bin/nvsbAppearances.pl>). After the deadline has passed, an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.**

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM  
OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

**MATTER GOING FORWARD**

1. Notice of Proposed Sale, Bidding Procedures, Auction, and Sale Hearing [[D.I. 512](#), 9/5/25]

Cure Objection Deadline: October 3, 2025 at 4:00 p.m. (ET)

Sale Objection Deadline: October 6, 2025 at 4:00 p.m. (ET)

<sup>1</sup> 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 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.

<sup>2</sup> Amended items appear in bold.



Related Pleadings:

- A. Order Establishing Bidding Procedures Relating to the Sales of All or a Portion of the Debtors' Assets [[D.I. 402](#), 7/29/25]
- B. Notice of Filing of Proposed Sale Order [[D.I. 563](#), 10/2/25]
- C. Notice of Filing of Stalking Horse Purchase Agreement for Debtors' Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, Florida [[D.I. 568](#), 10/6/25]
- D. Notice of Successful and Backup Bidders with Respect to the Auction of the Debtors' Real Property Located at (A) 15400 and 15412 Front Beach Road, Panama City, Florida and (B) 9600 N. Oceanshore Blvd., Flagler County, Florida [[D.I. 582](#), 10/14/25]
- E. Notice of Successful Bidder with Respect to Certain of the Debtors' Assets [[D.I. 603](#), 10/17/25]
- F. Order Approving Stalking Horse Bid Protections for Hutson Companies, L.L.C. [[D.I. 609](#), 10/20/25]
- G. Notice of Withdrawal of Docket No. 566 Without Prejudice [[D.I. 628](#), 10/22/25]
- H. Certification of Counsel Regarding Revised Proposed Sale Order and Asset Purchase Agreement for the Sale of Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, Florida [[D.I. 630](#), 10/22/25]
- I. Certification of Counsel Regarding Revised Proposed Sale Order and Asset Purchase Agreement for the Sale of Certain Other Florida Assets [[D.I. 631](#), 10/22/25]
- J. Declaration of Hugh Jackson in Support of the Proposed Sale of Certain Animals, Free and Clear of Liens, Claims, Interests, and Encumbrances [[D.I. 633](#), 10/22/25]
- K. 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 [[D.I. 635](#), 10/23/25]
- L. Notice of Revised Schedule to Asset Purchase Agreement for the Sale of Certain Other Florida Assets [[D.I. 647](#), 10/24/25]
- M. Debtors' Reply in Support of the Proposed Sale of the Marineland Property (9600 N. Oceanshore Blvd., Flagler County, Florida) [[D.I. 701](#), 11/5/25]

- N. 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 [[D.I. 702](#), 11/5/25]
- O. Declaration of Harold J. Bordwin in Support of the Proposed Sale of the Real Property Located at 9600 N. Oceanshore Blvd., Flagler County, Florida [[D.I. 703](#), 11/5/25]
- P. 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 [[D.I. 704](#), 11/5/25]
- Q. Declaration of Jakub Mleczko in Support of the (I) Proposed Sale of the Marineland Property to Delightful Development LLC, and (II) Transfer of Certain Animals to Theater of the Sea, Inc. [[D.I. 705](#), 11/5/25]
- R. Declaration of Robert Wagstaff in Support of the Proposed Sale of the Marineland Property (9600 N. Oceanshore Blvd., Flagler County, Florida) [[D.I. 706](#), 11/5/25]
- S. Declaration of Robert Wagstaff in Support of the Proposed Transfer of Certain Animals Located at Marineland [[D.I. 707](#), 11/5/25]
- T. Notice of Further Revised Proposed Sale Order and Asset Purchase Agreement for the Sale of Marineland Property (9600 N. Oceanshore Blvd. Flagler County, Florida) [[D.I. 708](#), 11/5/25]
- U. Notice of Further Revised Proposed Sale Order and Asset Purchase Agreement for the Sale of Certain Other Florida Assets [[D.I. 709](#), 11/5/25]
- V. Debtors' Witness List for Hearing Set for November 10, 2025 at 11:00 a.m. (ET) [[D.I. 717](#), 11/7/25]
- W. Declaration of Jon Rubel in Support of the Proposed Sale of Substantially All Assets of Marineland Leisure, Inc. [[D.I. 727](#), 11/11/25]**
- X. Notice of Successful and Backup Bidders with Respect to the Auction of the Debtors' Assets Located at 9600 N. Oceanshore Blvd., Flagler County, Florida [[D.I. 729](#), 11/11/25]**
- Y. Notice of Revised Proposed Sale Order and Asset Purchase Agreement for the Sale of Substantially All of the Debtors' Assets Associated with Marineland Dolphin Adventure [[D.I. 731](#), 11/11/25]**

Sale Responses Received: See Exhibit A attached hereto.

Status: This matter is going forward as an evidentiary hearing.

Dated: November 11, 2025

*/s/ Allison S. Mielke*

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**EXHIBIT A**

|     |                                                                                                                           |                                                                                  |
|-----|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| 1.  | Informal Response from the Office of the United States Trustee for the District of Delaware                               |                                                                                  |
| 2.  | Response of Jack Kassewitz                                                                                                | [ <a href="#">D.I. 636</a> , 10/23/25]<br>[ <a href="#">D.I. 643</a> , 10/24/25] |
| 3.  | Response of Jessica L. Stith                                                                                              | [ <a href="#">D.I. 639</a> , 10/24/25]                                           |
| 4.  | Response of C. Scott Taylor, PhD.                                                                                         | [ <a href="#">D.I. 640</a> , 10/24/25]<br>[ <a href="#">D.I. 661</a> , 10/28/25] |
| 5.  | Response of Robert Goodman                                                                                                | [ <a href="#">D.I. 641</a> , 10/24/25]                                           |
| 6.  | Response of Paula Parker                                                                                                  | [ <a href="#">D.I. 642</a> , 10/24/25]<br>[ <a href="#">D.I. 660</a> , 10/28/25] |
| 7.  | Response of Jon and Barbara Rubel<br>Apex Association, LLC                                                                | [ <a href="#">D.I. 644</a> , 10/24/25]                                           |
| 8.  | Response of James M. Sciuлло                                                                                              | [ <a href="#">D.I. 650</a> , 10/27/25]                                           |
| 9.  | Response of Elizabeth Stack                                                                                               | [ <a href="#">D.I. 657</a> , 10/28/25]                                           |
| 10. | Response of Kim Nadel                                                                                                     | [ <a href="#">D.I. 658</a> , 10/28/25]                                           |
| 11. | Response of Rae Neuwoman                                                                                                  | [ <a href="#">D.I. 659</a> , 10/28/25]                                           |
| 12. | Response of Jan Salerno                                                                                                   | [ <a href="#">D.I. 669</a> , 10/29/25]                                           |
| 13. | Response of V. Greene                                                                                                     | [ <a href="#">D.I. 679</a> , 10/30/25]                                           |
| 14. | Response of K.C.                                                                                                          | [ <a href="#">D.I. 680</a> , 10/31/25]                                           |
| 15. | Letter Request for Protective Order by Jack Kassewitz;<br>[Amended]Letter Request for Protective Order by Jack Kassewitz] | [ <a href="#">D.I. 685</a> , 11/3/25]<br>[ <a href="#">D.I. 700</a> , 11/5/25]   |
| 16. | Response of Caitlin Rose                                                                                                  | [ <a href="#">D.I. 686</a> , 11/3/25]                                            |
| 17. | Response of Tess Shacknow                                                                                                 | [ <a href="#">D.I. 687</a> , 11/3/25]                                            |
| 18. | Response of J.S.                                                                                                          | [ <a href="#">D.I. 688</a> , 11/3/25]                                            |
| 19. | Response of Shelby Velarde                                                                                                | [ <a href="#">D.I. 689</a> , 11/3/25]                                            |
| 20. | Response Jaime Burdick                                                                                                    | [ <a href="#">D.I. 690</a> , 11/3/25]                                            |
| 21. | Response – Anonymous                                                                                                      | [ <a href="#">D.I. 691</a> , 11/3/25]                                            |
| 22. | Response of Joni Lott                                                                                                     | [ <a href="#">D.I. 692</a> , 11/3/25]                                            |

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| 23. | Response of Olivia Mott                                                                         | [ <a href="#">D.I. 693</a> , 11/3/25] |
| 24. | Response of Rebecca Bryant                                                                      | [ <a href="#">D.I. 694</a> , 11/3/25] |
| 25. | Response of Tianna Betz                                                                         | [ <a href="#">D.I. 695</a> , 11/3/25] |
| 26. | [Redacted] Response of Flagler Palm Coast High School Students                                  | [ <a href="#">D.I. 698</a> , 11/5/25] |
| 27. | Declaration of Ashley Landwerlen, J.D. Regarding Animal Welfare and Federal Compliance Concerns | [ <a href="#">D.I. 699</a> , 11/5/25] |
| 28. | Response of Donna Brewer Kassewitz                                                              | [ <a href="#">D.I. 712</a> , 11/6/25] |