

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,

v.

Controladora Dolphin, SA de CV, *et al.*,

Defendants.

Chapter 11

Case No. 25-10606 (LSS)

Joint Administration Pending

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

**DEFENDANTS THE PRUDENTIAL INSURANCE COMPANY OF AMERICA,
PRUDENTIAL LEGACY INSURANCE COMPANY OF NEW JERSEY,
AND CIGNA HEALTH AND LIFE INSURANCE COMPANY'S
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, made applicable to the above-captioned adversary proceeding by Federal Rule of Bankruptcy Procedure 7056, Defendants Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (“**Defendants**” or the “**Secured Lenders**”), by and through their undersigned counsel, hereby submit this motion for summary judgment on all counts of the *Amended Complaint and Request for Declaratory Judgment to Determine Validity, Priority, and Extent of Liens on Debtors’ Property* (DE 15) filed by Plaintiff Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. (the “**Amended Complaint**”).

In support of this Motion, the Secured Lenders have filed contemporaneously herewith, and hereby incorporate by reference (i) *the Memorandum of Law in Support of the Secured Lenders’ Motion for Summary Judgment* (together with all exhibits and appendices attached thereto, the



“Opening Brief”); (ii) the *Declaration of Benjamin Davis in Support of the Secured Lenders’ Motion for Summary Judgment* (together with all exhibits and appendices attached thereto, the **“Davis Declaration”**); and (iii) the *Declaration of Robert Wagstaff*.

WHEREFORE, for the reasons set forth in the Opening Brief, the Secured Lenders respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting summary judgment in favor of the Secured Lenders on all Counts in the Amended Complaint, and granting such other and further relief as the Court deems just and proper.

[Signature page follows]

Dated: November 25, 2025

/s/ Ann M. Kashishian

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Company of America, Prudential Legacy Insurance
Company of New Jersey, and Cigna Health and Life
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Exhibit A

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

<i>In re</i> Leisure Investments Holdings LLC, <i>et al.</i> , Debtors.	Chapter 11 Case No. 25-10606 (LSS) Joint Administration Pending
Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. Plaintiff, v. Controladora Dolphin, SA de CV, <i>et al.</i> , Defendants.	Adv. Pro. No. 25-51024 (LSS)

**ORDER GRANTING DEFENDANTS THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA, PRUDENTIAL LEGACY INSURANCE COMPANY OF NEW JERSEY,
AND CIGNA HEALTH AND LIFE INSURANCE COMPANY’S
MOTION FOR SUMMARY JUDGMENT**

Upon consideration of the *Motion for Summary Judgment* (the “**Motion**”) filed by Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (“**Defendants**” or the “**Secured Lenders**”); and upon consideration of any opposition submitted in response thereto; and the Court having found upon review of the submissions by the parties that sufficient cause exists in support of the relief requested by the Motion:

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.
2. Pursuant to Rule 56 of the Federal Rules of Civil Procedures and Rule 7056 of the Federal Rules of Bankruptcy Procedure, summary judgment is granted in favor of the Defendants and against Plaintiff as to all Counts of the Amended Complaint.

3. This Court retains exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

CERTIFICATE OF SERVICE

I certify that on this 25th day of November 2025, the foregoing *Defendants The Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company's Motion for Summary Judgment*, has been served upon all parties that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the District of Delaware.

/s/ Ann. M. Kashishian
Ann M. Kashishian (No. 5622)

Dated: November 25, 2025