

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)

(Jointly Administered)

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

Related Docket Nos.: 19, 20

**DEFENDANT GLAS AMERICAS LLC'S JOINDER TO DEFENDANTS THE
PRUDENTIAL INSURANCE COMPANY OF AMERICA, PRUDENTIAL LEGACY
INSURANCE COMPANY OF NEW JERSEY, AND CIGNA HEALTH AND LIFE
INSURANCE COMPANY MOTION FOR SUMMARY JUDGMENT**

Defendant GLAS Americas LLC solely in its capacity as collateral agent to the prepetition Secured Lenders (the “**Collateral Agent**”), by and through its undersigned counsel, hereby submits this Joinder (the “**Joinder**”) to the *Motion for Summary Judgment and Incorporated Memorandum of Law* (the “**Motion**”) (Doc. Nos. 19 and 20),¹ filed by The Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey and CIGNA Health and Life Insurance Company (“**Secured Lenders**”). In support hereof, the Collateral Agent respectfully states as follows:

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Amended Complaint or the Motion.

JOINDER

1. The Collateral Agent agrees with the arguments set forth in the Secured Lenders' Motion and adopts and restates those arguments herein on behalf of the Collateral Agent.

2. The Collateral Agent respectfully requests that the Court: (1) grant the Motion and enter summary judgment against Tradewinds on the singular Count of Tradewinds' Amended Complaint; (2) issue an order declaring that Tradewinds does not hold a validly perfected, first priority lien on the Collateral that is prior in time and superior in right to the liens of the Secured Lenders; (3) deny all other relief sought in the Amended Complaint; and (4) grant such other and further relief as the Court deems just and proper.

3. As set forth in the Motion, on the facts of the case, Tradewinds cannot establish that it holds a valid judgment lien on the Collateral, including assets that do not belong to Controladora and are of a type not covered by its judgment lien. Further, Tradewinds cannot establish that it has perfected its lien such that it is senior to the Secured Lenders' lien on the Collateral.

4. Accordingly, the Collateral Agent respectfully submits that the Motion should be granted and summary judgment entered in favor of the Secured Lenders and the Collateral Agent.

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Dated: November 25, 2025
Wilmington, DE

Respectfully Submitted,

TROUTMAN PEPPER LOCKE LLP

By: /s/ Evelyn J. Meltzer

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*Counsel for GLAS Americas LLC, as collateral
agent*

CERTIFICATE OF SERVICE

I, Evelyn J. Meltzer, hereby certify that on the 25th of November 2025, I caused the foregoing *Defendant GLAS Americas LLC's Joinder to Defendants The Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company Motion for Summary Judgment* to be served upon the parties set forth below, in the manner indicated; and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

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