

**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)

TRADEWINDS, LTD. d/b/a
TRADEWINDS CONSULTING, LTD.,

Plaintiff,

v.

CONTROLADORA DOLPHIN, SA de CV,
DOLPHIN LEISURE, INC., GLAS
AMERICAS LLC, as Collateral Agent under
that certain Second Amended and Restated
Note Purchase Agreement, dated as of June 27,
2022, THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA, PRUDENTIAL
LEGACY INSURANCE COMPANY OF
NEW JERSEY, AND CIGNA HEALTH AND
LIFE INSURANCE COMPANY,

Defendants.

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

Related Docket Nos. 19, 20

**DEBTORS' JOINDER TO 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**

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 ("Riveron"), 600 Brickell Avenue, Suite 2550, Miami, FL 33131.



Leisure Investments Holdings LLC, and certain of its affiliates (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases hereby file this joinder to the (i) *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* [Adv. Docket No. 19] (the “**Lenders’ Motion for Summary Judgment**”) and (ii) *Memorandum of Law in Support of 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* [Adv. Docket No. 20] (hereinafter included in the definition of Lenders’ Motion for Summary Judgment) filed by Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (collectively, the “**Lenders**”) filed in the above-captioned adversary proceeding initiated by plaintiff Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. (“**Tradewinds**”).

The Debtors join in the Lenders’ Motion for Summary Judgment and each of the arguments advanced therein and hereby adopts and restates those arguments on behalf of the Debtors as though fully set forth here. As detailed in the Lenders’ Motion for Summary Judgment, Tradewinds cannot establish that (i) it holds a valid judgment lien on the Collateral or (ii) perfected its lien such that it is senior to the Lenders’ lien on the Collateral.

The Debtors therefore request that the Court (i) grant the Lenders’ Motion for Summary Judgment and enter summary judgment in favor of the Lenders and other defendants as to the First Claim for Relief asserted by Tradewinds in the amended complaint [Adv. Docket No. 15] (the “**Amended Complaint**”), (ii) deny any and all other relief sought in the Amended Complaint, and (iii) grant such other and further relief as the Court deems just and proper.

Dated: November 26, 2025

/s/ Sean T. Greecher

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Robert S. Brady (No. 2847)

Sean T. Greecher (No. 4484)

Allison S. Mielke (No. 5934)

Jared W. Kochenash (No. 6557)

Rodney Square

1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Email: rbrady@ycst.com

sgreecher@ycst.com

amielke@ycst.com

jkochenash@ycst.com

Counsel to the Debtors and Debtors in Possession