

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

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

**CERTIFICATION OF COUNSEL REGARDING ORDER
APPROVING STIPULATION FOR EXTENSION OF TIME**

I, William A. Hazeltine, counsel to the Plaintiff in the above-captioned adversary, hereby certify and state as follows:

1. On June 18, 2025 Plaintiff filed its *Complaint* [DI 1]. Defendants¹ filed their *Answer to the Complaint* on October 28, 2025 [DI 9].

2. On November 11, 2025, Plaintiff filed its *Amended Complaint* [DI 15]. Defendants filed their *Answer to the Amended Complaint on November 25, 2025* [DI 18] and, at the same time, filed *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* [DI 19] (the "Motion for Summary Judgment") and *Memorandum of Law in Support of*

¹ The stipulating Defendants are Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company (the "Defendants," and, together with Plaintiff, the "Parties").



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 [D.I. 20].

3. Plaintiff's response to the Motion for Summary Judgment is currently due on December 8, 2025.

4. Subject to Court approval, the Parties have entered into the Stipulation attached hereto as **Exhibit A** (the "Stipulation") to the proposed order (the "Proposed Order") extending the briefing schedule for the Motion for Summary Judgment. The Parties have agreed that the Plaintiff's response to the Motion for Summary Judgment will be due no later than January 9, 2026 and the Defendants' reply in support of the Motion for Summary Judgment will be due no later than January 30, 2026.

Wherefore, Plaintiff hereby respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit 1** at its earliest convenience.

Date: December 8, 2025
Wilmington, DE

SULLIVAN • HAZELTINE • ALLINSON LLC

/s/ William A. Hazeltine

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EXHIBIT 1

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

Related Docket No. ____

ORDER APPROVING STIPULATION EXTENDING TIME TO RESPOND

Upon consideration of the *Certification of Counsel Regarding Order Approving Stipulation for Extension of Time*, it is hereby:

ORDERED that the Stipulation attached hereto as **Exhibit A** is approved; and it is further

ORDERED that the Plaintiff's response to the Motion for Summary Judgment shall be due no later than January 9, 2026; and it is further

ORDERED that Defendants' reply in support of the Motion for Summary Judgment shall be due no later than January 30, 2026.

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. Proc. No. 25-51024 (LSS)

STIPULATION EXTENDING TIME TO RESPOND

Plaintiff Tradewinds, Ltd. d/b/a Tradewinds Consulting, Ltd. (the “Plaintiff”) and Defendants Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company, (the “Defendants,” and, together with Plaintiff, the “Parties”) jointly submit this stipulation to extend the briefing schedule for Defendants’ Motion for Summary Judgment [DI 19], and in support thereof state as follows:

1. On June 18, 2025, Plaintiff filed its *Complaint* [DI 1]. The Defendants filed their *Answer to the Complaint* on October 28, 2025 [DI 9].

2. On November 11, 2025, Plaintiff filed its *Amended Complaint* [DI 15]. Defendants filed their *Answer to the Amended Complaint on November 25, 2025 [DI 18]* and, at the same time, filed *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* [DI 19] (the “Motion for Summary Judgment”) and *Memorandum of Law in Support of*

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 [D.I. 20].

3. Plaintiff's response to the Motion for Summary Judgment is currently due on December 8, 2025.

4. The Parties have agreed that (i) Plaintiff's response to the Motion for Summary Judgment will be due no later than January 9, 2026 and Defendants' reply in support of the Motion for Summary Judgment will be due no later than January 30, 2026.

Dated: December 8, 2025

SULLIVAN • HAZELTINE • ALLINSON LLC

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