

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)

RE: D.I. 749

**CERTIFICATION OF COUNSEL REGARDING FIRST
INTERIM APPLICATION OF RAINES FELDMAN LITTRELL LLP FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES, AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR THE PERIOD MAY 23, 2025 THROUGH SEPTEMBER 30, 2025**

The undersigned hereby certifies as follows:

1. On November 14, 2025, Raines Feldman Littrell LLP (“**Raines**”) filed the *First Interim Application of Raines Feldman Littrell LLP for Compensation for Services Rendered and Reimbursement of Expenses, as Co-Counsel for the Official Committee of Unsecured Creditors for the Period May 23, 2025 Through September 30, 2025* [D.I. 749] (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). A notice filed with the Application included a response deadline of December 5, 2025.
2. Raines received informal comments from the Office of the United States Trustee and requests for reduction for some items listed in the Application.
3. Raines has agreed and will reduce the total fee request by \$8,800.00 to \$294,134.00.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are as follows: Leisure Investments Holdings LLC (7260); Triton Investments Holdings LLC (6416); MS Leisure Company (7257); Icarus Investments Holdings LLC (2636); Ejecutivos de Turismo Sustentable S.A. de C.V. (5CA4); Dolphin Capital Company, S. de R.L. de C.V. (21H8); Dolphin Leisure, Inc. (7073); Dolphin Austral Holdings, S.A. de C.V. (6A13); Aqua Tours, S.A. de C.V. (6586); Viajero Cybernetical, S.A. de C.V. (1CZ7); Promotora Garrafón, S.A. de C.V. (0KA2); Marineland Leisure, Inc. (7388); GWMP, LLC (N/A); Gulf World Marine Park, Inc. (0348); and The Dolphin Connection, Inc. (0322). 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.



4. No objections or other formal or informal responses to the Application have been filed with the Court or received by Raines.

5. Attached hereto as **Exhibit A** is a revised proposed form of order (the “**Revised Order**”) approving the requested fees, as reduced by agreement, and expense reimbursements.

6. For the convenience of the Court and all parties in interest, a redline of the Revised Final Fee Order over the proposed original order is attached hereto as **Exhibit B**.

WHEREFORE, Raines respectfully requests that the revised order, substantially in the form attached hereto, be entered at the earliest convenience of the Court.

Dated: December 8, 2025

RAINES FELDMAN LITRELL, LLP

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)

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*Co-Counsel to the Committee of Unsecured
Creditors*

EXHIBIT A

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

<p>In re:</p> <p>LEISURE INVESTMENTS HOLDINGS LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-10606 (LSS)</p> <p>(Jointly Administered)</p> <p>Re: D.I.</p>
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**ORDER GRANTING FIRST INTERIM APPLICATION OF
RAINES FELDMAN LITRELL LLP FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES,
AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR THE PERIOD MAY 23, 2025 THROUGH SEPTEMBER 30, 2025**

Raines Feldman Littrell LLP (“Raines”), as co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) in the above captioned cases, filed its First Interim Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from May 23, 2025 through September 30, 2025 (the “Interim Fee Application”). The Court has reviewed the Interim Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Interim Fee Application, and any hearing on the Interim Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Interim Fee Application. Accordingly, it is hereby,

ORDERED that the Interim Fee Application is GRANTED, on an interim basis. The Debtor in the above-captioned cases shall pay to Raines the sum of 294,134.00² as compensation

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² This amount is reduced by \$272.00 as requested by the United States Trustee.

for necessary professional services rendered, and actual and necessary expenses in the amount of \$2,420.22 for a total of \$296,554.22 for services rendered and disbursements incurred by Raines for the period May 23, 2025 through September 30, 2025, less any amounts previously paid in connection with the monthly fee applications.

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B

**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)

Re: D.I.

**ORDER GRANTING FIRST INTERIM APPLICATION OF
RAINES FELDMAN LITTRELL LLP FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES,
AS CO-COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR THE PERIOD MAY 23, 2025 THROUGH SEPTEMBER 30, 2025**

Raines Feldman Littrell LLP (“Raines”), as co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) in the above captioned cases, filed its First Interim Application for Compensation for Services Rendered and Reimbursement of Expenses for the Period from May 23, 2025 through September 30, 2025 (the “Interim Fee Application”). The Court has reviewed the Interim Fee Application and finds that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) notice of the Interim Fee Application, and any hearing on the Interim Fee Application, was adequate under the circumstances; and (c) all persons with standing have been afforded the opportunity to be heard on the Interim Fee Application. Accordingly, it is hereby,

ORDERED that the Interim Fee Application is GRANTED, on an interim basis. The Debtor in the above-captioned cases shall pay to Raines the sum of ~~\$302,662.00~~294,134.00² as

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² This amount is reduced by \$272.00 as requested by the United States Trustee.

compensation for necessary professional services rendered, and actual and necessary expenses in the amount of \$2,420.22 for a total of ~~\$305,082.22~~296,554.22 for services rendered and disbursements incurred by Raines for the period May 23, 2025 through September 30, 2025, less any amounts previously paid in connection with the monthly fee applications.

ORDERED that this Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Summary report: Litera Compare for Word 11.10.0.38 Document comparison done on 12/8/2025 9:53:17 AM	
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<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
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Embedded Excel	0
Format changes	0
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