

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. 748

**CERTIFICATION OF COUNSEL REGARDING FIRST INTERIM
APPLICATION OF THE LAW OFFICES OF MANGANELLI, LEIDER & SAVIO, P.A.
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, Manganelli, Leider & Savio, P.A. (“**Manganelli**”) filed the *First Interim Application of Manganelli, Leider & Savio, P.A. 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. 748] (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. Manganelli received informal comments from the Office of the United States Trustee and requests for reduction for some items listed in the Application.
3. Manganelli has agreed and will reduce the total fee request by \$5,070.00.00 to \$134,050.00.

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 Manganelli.

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, Manganelli 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)

Mark W. Eckard (No. 4542)

824 North Market Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

tfrancella@raineslaw.com

meckard@raineslaw.com

-and-

**LAW OFFICES OF MANGANELLI, LEIDER
& SAVIO, P.A.**

Christian Savio

1900 N.W. Corporate Blvd., Ste. 200W

Boca Raton, FL 33431

561-826-1740

csavio@mls-pa.com

*Co-Counsel to the Committee of Unsecured
Creditors*

EXHIBIT A

**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 FOR
THE LAW OFFICES OF MANGANELLI, LEIDER & SAVIO, P.A. 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 Law Offices of Manganelli, Leider & Savio, P.A. (“**Manganelli**”), 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 Manganelli the sum of \$134,050.00 as

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.

compensation for necessary professional services rendered, and actual and necessary expenses in the amount of \$0 for a total of \$134,050.00 for services rendered and disbursements incurred by Manganelli 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 FOR
THE LAW OFFICES OF MANGANELLI, LEIDER & SAVIO, P.A. 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 Law Offices of Manganelli, Leider & Savio, P.A. (“**Manganelli**”), 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 Manganelli the sum of \$~~139,120.00~~134,050.00

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.

as compensation for necessary professional services rendered, and actual and necessary expenses in the amount of \$0 for a total of \$~~139,120.00~~134,050.00 for services rendered and disbursements incurred by Manganelli 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 10:15:11 AM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: iw://39024-mobility.imatech.com/WORKSITE/10672140/1	
Modified DMS: iw://39024-mobility.imatech.com/WORKSITE/10672142/1	
Changes:	
<u>Add</u>	4
Delete	4
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	8