

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

LEISURE INVESTMENTS HOLDINGS  
LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

**RE: D.I. 750**

**CERTIFICATION OF COUNSEL REGARDING FIRST INTERIM  
APPLICATION OF FORCE TEN PARTNERS LLC FOR COMPENSATION  
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES, AS  
FINANCIAL ADVISOR 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, Force Ten Partners LLC (“**Force 10**”) filed the *First Interim Application of Force Ten Partners LLC for Compensation for Services Rendered and Reimbursement of Expenses, as Financial Advisor for the Official Committee of Unsecured Creditors for the Period May 23, 2025 Through September 30, 2025* [D.I. 750] (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<sup>2</sup>.
2. Force 10 received informal comments from the Office of the United States Trustee and requests for reduction for some items listed in the Application.
3. Force 10 has agreed and will reduce the total fee request by \$6,395.00 to \$230,060.00.

<sup>1</sup> 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.

<sup>2</sup> The response deadline was extended to December 12, 2025 for the United States Trustee.



4. No objections or other formal or informal responses to the Application have been filed with the Court or received by Force 10.

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**, Force 10 respectfully requests that the revised order, substantially in the form attached hereto, be entered at the earliest convenience of the Court.

Dated: December 12, 2025

**RAINES FELDMAN LITRELL LLP**

/s/ Thomas J. Francella, Jr.

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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**

In re:

LEISURE INVESTMENTS HOLDINGS  
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Debtors.

Chapter 11

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(Jointly Administered)

**RE: D.I. 750**

**ORDER GRANTING FIRST INTERIM APPLICATION OF  
FORCE TEN PARTNERS LLC FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS  
FINANCIAL ADVISOR FOR THE OFFICE COMMITTEE OF UNSECURED  
CREDITORS FOR THE PERIOD MAY 23, 2025 THROUGH SEPTEMBER 30, 2025**

Force Ten Partners LLC (“Force 10”), as financial advisor 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 Force 10 the sum of \$230,060.00 as compensation

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for necessary professional services rendered, and actual and necessary expenses in the amount of \$46.70 for a total of \$230,106.70 for services rendered and disbursements incurred by Force 10 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:

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LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10606 (LSS)

(Jointly Administered)

**RE: D.I. [750](#)**

**ORDER GRANTING FIRST INTERIM APPLICATION OF  
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ORDERED that the Interim Fee Application is GRANTED, on an interim basis. The Debtor in the above-captioned cases shall pay to Force 10 the sum of \$~~236,455.50~~230,060.00 as

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



<b>Summary report:</b> <b>Litera Compare for Word 11.10.0.38 Document comparison done on</b> <b>12/11/2025 1:04:46 PM</b>	
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Format changes	0
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