

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Subject: SUPPLEMENTAL OBJECTION TO THE RETENTION OF COUNSEL AND FEE ADJUSTMENT Docket No. 1029.

CASE NUMBER 25-10606

HONORABLE JUDGE LAURIE SELBER SILVERSTEIN

United States Bankruptcy Court

For the District of Delaware

824 N Market St #3000, Wilmington, DE 19801,

United States of America.¹

cacia_batts@deb.uscourts.gov

lora_johnson@deb.uscourts.gov

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DISTRICT OF DELAWARE

CONCEPCIÓN ESTEBAN MANCHADO, appearing in my right as a labor plaintiff and interested party, hereby files a supplemental formal objection regarding the hiring and fee adjustment [Docket No. 1029] to allege a pattern of bad faith, potential corruption and bribery from labor lawyers and racketeering in this process, based on the following:

I.- The monthly fixed retainer to the Labor attorneys in charge of the labor cases, never exceeded of average of \$1500,00 USD. I am aware of this fact, as my responsibilities while retained by The Dolphin company (TDC) by the companies included managing relationships with the outside attorneys who provided services to TDC, including the labor lawyers.

¹ And to the parties with the right to notification:

- The Debtors' Attorney, Young Conaway Stargatt & Taylor, LLP, 1000 N. King Street, Wilmington, DE 19801, Attn: Sean T. Greecher (sgreecher@ycst.com) and Jared W. Kochenash (jkochenash@ycst.com);
- The Office of the U.S. Receiver for the District of Delaware, 844 King Street, Room 2207, Lockbox 35, Wilmington, DE 19801, Attn: Benjamin A. Hackman (Benjamin.a.hackman@usdoj.gov);
- The attorneys of the Official Committee of Unsecured Creditors, (a) Raines Feldman Littrell LLP, 824 North Market Street, Suite 805, Wilmington, DE 19801, Attn: Thomas J. Francella, Jr. (tfrancella@raineslaw.com) and (b) Law Offices of Manganelli, Leider & Savio, P.A., 1900 N.W. Corporate Blvd., Ste. 200W, Boca Raton, FL 33431, Attn: Christian Savio (csavio@mls-pa.com);
- DIP lenders and counsel for DIP lenders, Baker & McKenzie LLP, 830 Brickell Plaza, Suite 3100, Miami, FL 33131, Attn: Paul J. Keenan Jr. (paul.keenan@bakermckenzie.com), and 452 Fifth Avenue, New York, New York 10018, Attn: Blaire A. Cahn (blaire.cahn@bakermckenzie.com);
- The DIP Agent, GLAS Americas, LLC, 3 Second Street, Suite 206 Jersey City, NJ 07311, Re: Triton Investments Holdings, LLC (clientservices.usadcm@glas.agency);
- DIP Agent Counsel, Foley & Lardner LLP, 111 Huntington Avenue, Suite 2500, Boston, MA 02199, Attn: Adrienne K. Walker (awalker@foley.com);
- The first pre-suit lien-dealer and the second pre-suit lien-broker, GLAS Americas, LLC, 3 Second Street, Suite 206 Jersey City, NJ 07311; Attn: Controladora Dolphin, S.A. de C.V.-agent of guarantees (clientservices.usadcm@glas.agency);
- Attorney for the First Liender and the Second Lien, Foley & Lardner LLP, 111 Huntington Avenue, Suite 2500, Boston, MA 02199, Attn: Adrienne K. Walker (awalker@foley.com); y
- All parties who have requested notice in these Chapter 11 cases. (I do not know because I do not have access to this file)



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II. As I stated in my previous objection, after the Chapter 11 filing, the law firm De la Vega & Martínez Rojas was retained by the debtors, establishing a fee of approximately US\$15,000 per month, representing a 900% increase over the original cost.

III. In January 2026, the lenders/debtors requested an increase in these benefits to \$50,000 USD per month. This requested increase coincided exactly with two critical events in Mexico that I have already mentioned:

1. The arbitrary and inexplicable freezing of my labor lawsuit.
2. The discovery and exposure of the labor department in Quintana Roo, a high - ranking official who is not allowed to litigate in labor cases for an obvious conflict of interest Mr. Jose Francisco Trujillo Brandi, who's name came out in the legal documents filed by De la Vega & Martínez Rojas as one of the appointed attorneys. The use of Government resources by this firm, are being used to "incorporate" high-ranking government officials to litigate against me and other workers is an act of corruption currently under investigation.

It is important to note that now, The Company intends to clean their illegalities under investigation by replacing the firm De la Vega & Martínez Rojas and appointing a new one with the fee increase they need to continue bribing authorities using these funds are asking you approve, Your Honor. This demonstrates that the amount is a fixed "political budget" and not a reflection of actual legal work.

The nature of the debtor's malpractice legal strategy is documented by concrete facts:

- a) Between February 10 and 11, 2026, I received repeated threats through my lawyer handling my labor lawsuit, sent by the firm De la Vega & Martínez Rojas, with the supposed intention of reaching a settlement agreement to conclude my labor case. They threatened to bring criminal charges against me if I did not withdraw my labor claims, to which I am entitled after having worked for The Dolphin Company for more than 25 years. My lawyer responded that he would not allow criminal charges to be used to resolve a labor matter. I wish to inform Your Honor that I have sufficient reason to believe my safety is at risk and that the actions being taken require additional funds, as they are using funds from the bankruptcy estate to illegally pursue criminal charges.
- b) The above is not an isolated incident. Furthermore, there is a separate incident: during a conciliation hearing at the Labor Conciliation Center held in July 2025, in which Mr. Matías Marambio (representative of the U.S. consulting firm Riveron) and members of the so-called "new administration" team were present, Mr. Fernando Patiño informed my labor attorney, in my presence and in the presence of Mr. Marambio himself, that Mr. Trujillo Brandi, a high-ranking state government official, whom I had already mentioned in my previous objection, is part of the firm as a correspondent for De la Vega & Martínez Rojas. This fact confirms the acknowledgment of the illicit relationship between Mexican government officials and the obstruction of my labor rights. Riveron, through Mr. Marambio, witnessed this admission and has not reported this FCPA violation to this Court.
- c) In addition to the above, on February 2, 2026, the debtors presented the proposal from Yllanes Ramos, a law firm that, as I mentioned before, intends to be paid the exact same exorbitant sum of USD\$50,000 per month, an amount that is not justified. This amount is not intended for managing labor matters such as those handled by the company, unless it serves to simulate payments to lawyers when it is used for extortion and acts of corruption.

As a reference, the 50,000 monthly fee for a firm advisors in labor cases is more than twice my monthly retainer fee paid by TDC for full time handing all corporate legal work for TDC

It is very concerning that Yllanes Ramos's cover letter mentions Gerardo Roel Yllanes as the supposed lawyer responsible for the account and that it also expressly states that he signed a sworn statement. However, upon reviewing the statement, it was verified that it was not signed by him, but by Edith Angélica Reyes Hernández. I am bringing this to your attention as the documents are not properly signed by the person who is supposed to come under oath at this court.

Your Honor I come to you respectfully request that this Court:

1. Review and withholding the requested monthly cap of \$50,000 a month approval, until it is fully disclosed:
 - a. Why is 32X higher than other labor firms used to charge for similar work for TDC;
 - b. How many other clients, if any this proposed labor has paying them a monthly retainer fee of up to USD\$ 50,000; and
 - c. A formal declaration under oath that NO OFFICIAL OF ANY RANK OF THE GOVERNMENT OF QUINTANA ROO is either or indirectly associated with the firm, partner or relative of anybody associated with the firm.
2. ORDER an evidentiary hearing to investigate the links between the Debtor's previous and current lawyers and the Undersecretary of Labor of Quintana Roo Mexico.
3. REFER this matter to the United States Trustee and the Department of Justice (DOJ) for possible investigation under the FCPA (Foreign Corrupt Practices Act).

Respectfully submitted,



Concepción Esteban Manchado

Date: March 10, 2026

Labor Creditor - Pro Se

ORIGIN ID:MPBA (000) 000-0000
CONCEPCION ESTEBAN

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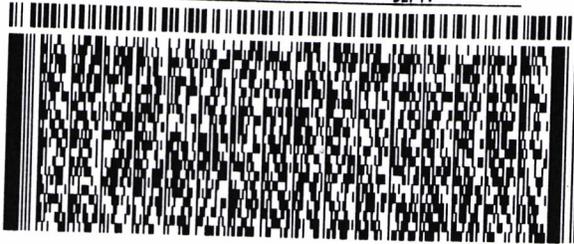
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TO LAURIE SELBER SILVERSTEIN
UNITED STATES BANKRUPTCY COURT
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WILMINGTON DE 19801

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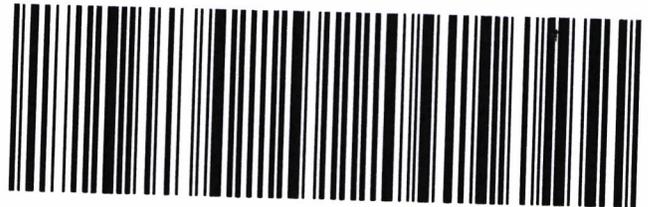
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