

**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)

Hearing Date: May 5, 2025 at 10:00 a.m. (ET)

Obj. Deadline: April 28, 2025 at 4:00 p.m. (ET)

Ref. Docket Nos. 7, 9, 38 & 40

OMNIBUS NOTICE OF FIRST DAY PLEADINGS AND FINAL HEARING THEREON

PLEASE TAKE NOTICE that, on March 31, 2025, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), filed, among others, the following first day pleadings (collectively, the “**First Day Pleadings**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”):

1. Debtors’ Motion for Entry of an Order (I) Compelling Debtors’ Former Officers and Other Required Person to Turn Over Records and (II) Granting Related Relief [D.I. 7]
2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition First Lien Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [D.I. 9]

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings was held on April 2, 2025 (the “**First Day Hearing**”), after which the Court entered orders granting the relief requested in the First Day Pleadings on an interim basis [Docket Nos. 38 and 40] (collectively, the “**Interim Orders**”). You have been or will be served a copy of the Interim Orders.

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 Cibernético, 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.



PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and any of the related Interim Orders are available, free of charge, from the website of the Court appointed claims agent, Verita Global, online at <https://www.veritaglobal.net/dolphinco>.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the entry of any orders approving the interim relief set forth in the Interim Orders on a final basis must be filed on or before **April 28, 2025, at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, copies of any responses or objections must be served so as to be received on or before the Objection Deadline upon the following parties: (i) proposed counsel to the Debtors, Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, Attn: Sean T. Greecher (sgreecher@ycst.com), Allison S. Mielke (amielke@ycst.com), and Jared W. Kochenash (jkochenash@ycst.com); (ii) the Office of the United States Trustee for the District of Delaware, Attn: Benjamin A. Hackman (Benjamin.A.Hackman@usdoj.gov); (iii) counsel to the Prepetition First Lien Noteholders and the DIP Lenders, Baker & McKenzie LLP, Attn: Paul J. Keenan, Jr. (paul.keenan@bakermckenzie.com), 452 Fifth Avenue, New York, NY 10018; (iv) counsel to the Prepetition Second Lien Noteholders, Latham & Watkins LLP, Attn: James Ktsanes (james.ktsanes@lw.com); (v) counsel to the DIP Agent, the Prepetition First Lien Agent, and the Prepetition Second Lien Agent, Troutman Pepper Locke, LLP, Attn: Adrienne K. Walker (awalker@troutman.com), 111 Huntington Avenue Boston, MA 02199; and (vi) counsel to any statutory committee appointed in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER APPROVAL OF THE FIRST DAY PLEADINGS ON A FINAL BASIS IS SCHEDULED FOR MAY 5, 2025, AT 10:00 A.M. (ET) BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE FIRST DAY PLEADINGS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH FIRST DAY PLEADINGS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.

[Signature Page Follows]

Dated: April 4, 2025

/s/ Jared W. Kochenash

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