

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. 375

**CERTIFICATE OF NO OBJECTION REGARDING FIRST
MONTHLY APPLICATION OF RAINES FELDMAN LITTRELL LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE
PERIOD FROM MAY 23, 2025 THROUGH AND INCLUDING JUNE 30, 2025**

I, Thomas J. Francella, Jr., hereby certify as follows:

On July 23, 2025, Raines Feldman Littrell LLP (“**RFL**”), co-counsel to the Official Committee of Unsecured Creditors, filed its *First Monthly Application for Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period From May 23, 2025 through June 30, 2025* (the “**Application**”) [D.I. 375] with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

The deadline to object to the Application was August 13, 2025 at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court’s docket in these cases, no formal answer, objection, or other responsive pleading to the Application appears thereon.

Pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [D.I. 109],

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.



no further order is required, and RFL is entitled to receive 80% of its fees (\$142,218.50) and 100% of its expenses (\$1,492.37).

Date: August 14, 2025

RAINES FELDMAN LITRELL LLP

/s/ Mark W. Eckard

Thomas J. Francella, Jr. (3835)

Mark W. Eckard (No. 4542)

824 N. Market Street, Suite 805

Wilmington, DE 19801

(302) 772-5803

tfrancella@raineslaw.com

meckard@raineslaw.com

Co-Counsel to the Official Committee of Unsecured Creditors