

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: LEISURE INVESTMENTS HOLDINGS LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11 Case No. 25-10606 (LSS) (Jointly Administered) <b>Objection Deadline: January 5, 2026 at 4:00 p.m. (ET)</b>
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**SIXTH MONTHLY APPLICATION OF THE LAW OFFICES OF  
MANGANELLI, LEIDER & SAVIO, P.A. FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM NOVEMBER 1, 2025 THROUGH AND INCLUDING NOVEMBER 30, 2025**

*Name of Applicant:* THE LAW OFFICES OF MANGANELLI,  
LEIDER & SAVIO, P.A.

*Authorized to Provide Professional Services to:* Official Committee of Unsecured Creditors

*Date of Retention:* Effective May 23, 2025

*Period for Which Compensation and  
Reimbursement is Sought:* November 1, 2025 through November 30,  
2025

*Amount of Compensation Sought as  
Actual, Reasonable and Necessary:* \$16,960.00 (80% = \$13,568.00)

*Amount of Expense Reimbursement Sought as  
Actual, Reasonable and Necessary:* \$0

This is a(n) \_\_\_ Interim  Monthly \_\_\_ Final Fee Application.

<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.



**PRIOR MONTHLY APPLICATIONS FILED**

<b>Dated Filed</b>	<b>Period Covered</b>	<b>Requested</b>		<b>Approved for Payment</b>	
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
7/31/2025 [D.I. 406]	May 23, 2025- June 30, 2025	\$71,565.00	\$0	\$57,252.00	\$0
8/21/2025 [D.I. 468]	July 1, 2025 – July 31, 2025	\$31,235.00	\$0	\$24,988.00	\$0
9/17/2025 [D.I. 531]	August 1, 2025 – August 31, 2025	\$28,270.00	\$0	\$22,616.00	\$0
10/15/2025 [D.I. 592]	September 1, 2025 – September 30, 2025	\$8,050.00	\$0	\$6,440.00	\$0
11/17/25 [D.I. 755]	October 1, 2025 – October 31, 2025	\$16,310.00	\$0	Pending	Pending

The total time expended in connection with the preparation of this fee application is not included herein as such time was expended after the Application Period.

**PRIOR QUARTERLY APPLICATIONS FILED**

<b>Dated Filed</b>	<b>Period Covered</b>	<b>Requested</b>		<b>Approved for Payment</b>	
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
11/14/2025 [D.I. 748]	May 23, 2025- September 30, 2025	\$139,120.00	\$0	Pending	Pending

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: LEISURE INVESTMENTS HOLDINGS LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11 Case No. 25-10606 (LSS) (Jointly Administered)  <b>Objection Deadline: January 5, 2026 at 4:00 p.m. (ET)</b>
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**SIXTH MONTHLY APPLICATION OF THE LAW OFFICES  
OF MANGANELLI, LEIDER & SAVIO, P.A. FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD  
FROM NOVEMBER 1, 2025 THROUGH AND INCLUDING NOVEMBER 30, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), The Law Offices of Manganelli, Leider & Savio, P.A. (“**ML&S**”), co-counsel to the Official Committee of Unsecured Creditors (the “**Committee**”), hereby submits its sixth monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from November 1, 2025 through and including November 30, 2025 (the “**Application Period**”). By this Application, ML&S seeks a monthly interim allowance of compensation in the amount of \$16,960.00 and actual expenses in the amount of \$0, for an aggregate total of \$16,960.00 in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained*

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<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.

*Professionals and (II) Granting Related Relief* [D.I. 109] entered April 30, 2025 (the “**Interim Compensation Order**”). ML&S hereby seeks payment of \$13,568.00 (80% of the allowed fees) and reimbursement of \$0 (100% of allowed expenses), for an aggregate total payment of \$13,568.00 for the Application Period upon the filing of a certificate of no objection. In support thereof, ML&S respectfully represents as follows:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over the Debtors, their estates, and this matter under 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue of this proceeding and this Application is proper in this district pursuant to 28 U.S.C. § 1408.

3. Pursuant to Local Rule 9013-1(f), ML&S consents to the entry of a final order by the Court in connection with this Application, to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

**BACKGROUND**

**A. GENERAL BACKGROUND**

5. On March 31, 2025 each of the Debtors filed a voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and

managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. The Office of the United States Trustee appointed the Committee, consisting of the following three (3) members: (i) Atlantic/Pacific Products, Inc., (ii) Promotions Guy LLC, and (iii) Xpand Staffing LLC. [D.I. 151].

7. On April 30, 2025, the Court entered the Interim Compensation Order, authorizing certain professionals (“**Professionals**”) to submit monthly applications for compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Interim Compensation Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses

**B. RETENTION OF MANGANELLI, LEIDER & SAVIO, P.A.**

8. On June 6, 2025, the Committee filed the *Application to Retain and Employ the Law Offices of Manganelli, Leider & Savio, P.A. as Co-Counsel for the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025* [D.I. 207].

9. On July 2, 2025, the Court entered the *Order Granting Application for Entry of an Order Authorizing the Retention and Employment of the Law Offices of Manganelli, Leider & Savio, P.A. as Co-Counsel to the Official Committee of Unsecured Creditors Pursuant to Bankruptcy Code Section 1103 Effective as of May 23, 2025* [D.I. 295].

**RELIEF REQUESTED**

10. Subject to Court approval, ML&S seeks the allowance of compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by ML&S during the Application Period. The rates charged by ML&S in these Cases do not differ from the rates charged to ML&S's non-bankruptcy clients.

11. This Application is the sixth monthly fee application filed by ML&S in these Cases. In connection with the professional services described below, by this Application ML&S seeks allowance of compensation in the amount of \$16,960.00 and reimbursement of actual and necessary expenses in the amount of \$0 for the Application Period.

**A. COMPENSATION REQUESTED**

12. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Committee during the Application Period, the regular customary billing rates and the total value of time incurred by each of the ML&S attorneys rendering services to the Committee is attached hereto as **Exhibit A**.

13. A copy of the computer-generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "**Guidelines**"), is attached hereto as **Exhibit B**.

**B. EXPENSE REIMBURSEMENT**

14. As confirmed by the statement attached as **Exhibit C**, ML&S did not incur any out-of-pocket expenses during the Application Period. All time entries and requested expenses are in

compliance with Rule 2016-1 of the Local Rules.<sup>2</sup>

**RESPONSES TO FEE GUIDELINES QUESTIONNAIRE**

QUESTION	RESPONSE	EXPLANATION
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No	N/A
If the fees sought in this fee application as compared to the fees budgeted for this time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	No	N/A
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	No	N/A
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA formal Ethics Opinion 11-458?	N/A	N/A

<sup>2</sup> ML&S has also attempted to ensure that this Application complies with the Guidelines. To the extent that the Guidelines conflict with the Local Rules, in particular, Local Rule 2016-1, ML&S has chosen to comply with such Local Rule. ML&S will supplement this Application with additional detail or information upon request.

**LEGAL STANDARD**

15. Section 330(a)(1) of the Bankruptcy Code allows the payment of:
  - (A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and
  - (B) Reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1). Reasonableness of compensation is driven by the “market-driven approach” which considers the nature, extent and value of services provided by the professional and cost of comparable services in the non-bankruptcy contexts. See *Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

16. In accordance with its practices in non-bankruptcy matters, ML&S has calculated its compensation requested in this Application by applying its standard hourly rates. ML&S’s calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, ML&S’s rates should be determined to be reasonable under section 330 of the Bankruptcy Code.

17. ML&S’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, accelerated deadlines, and size of these Cases. ML&S’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, ML&S’s fees are reasonable pursuant to section 330 of the Bankruptcy Code.

18. Section 330(a)(1)(B) of the Bankruptcy Code permits reimbursement for actual,

necessary expenses. As stated above, ML&S did not incur any out-of-pocket expenses during this Application Period.

19. Except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between ML&S and/or any third person for the sharing or division of compensation. All the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Committee.

20. Pursuant to the standards set forth in sections 330 and 331 of the Bankruptcy Code, ML&S submits that the compensation requested is for actual and necessary services and expenses, and is reasonable, based upon the nature, extent and value of such services, the time spent thereon, and the costs of comparable services in a case under the Bankruptcy Code.

21. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which ML&S actually rendered these services. The considerable challenges of this case have been attended to and managed by ML&S at all levels, promptly, expertly, and often to the exclusion of the other matters in ML&S's office. ML&S submits, therefore, that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

**RESERVATION OF RIGHTS**

22. To the extent time or disbursement charges for services rendered or disbursements incurred relate to the Application Period but were not processed prior to the preparation of this Application, or ML&S has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application Period, ML&S reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

**CERTIFICATE OF COMPLIANCE AND WAIVER**

23. Pursuant to Local Rule 2016-1 (g), the undersigned representative of ML&S certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, ML&S believes that such deviations are not material and respectfully requests that any such requirements be waived.

**CONCLUSION**

**WHEREFORE**, ML&S respectfully requests (a) that it be allowed compensation in the amount of \$16,960.00 for professional services rendered (80% or \$13,568.00) of which is to be paid upon the filing of a certificate of no objection) for the Application Period; and (b) that the Court authorize and direct the Debtors to pay ML&S the amounts due and owing hereunder in accordance with the Interim Compensation Order.

Dated: December 15, 2025

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

*/s/Christian Savio* \_\_\_\_\_  
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*

**VERIFICATION**

Christian Savio, after being sworn according to law, deposes and says:

- a) I am a partner with The Law Offices of Manganelli, Leider & Savio, P.A.
- b) I have personally performed or am familiar with the services rendered by The Law Offices of Manganelli, Leider & Savio, P.A., as co-counsel to the Official Committee of Unsecured Creditors.
- c) I have reviewed the foregoing Fee Application, and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Local Rule 2016-2 and submit that the Fee Application complies with such Rule.

Dated: December 15, 2025

          /s/ Christian Savio            
Christian Savio

**EXHIBIT A****Summary of Time by Project Category**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours</b>	<b>Amount</b>
B110	Case Administration	.3	\$195.00
B130	Asset Disposition	16.3	\$10,595.00
B150	Meetings and Communications with Creditors	2.7	\$1,035.00
B160	Fee Applications/Objections	.4	\$260.00
B170	Employment Applications/Objections	1.1	\$715.00
B190	Other Contested Matters/Omnibus Hearing	1.7	\$1,105.00
B210	Business Operations	4.5	\$2,925.00
B320	Plan and Disclosure Statement	.2	\$130.00
<b>TOTAL</b>		<b>27.2</b>	<b>\$16,960.00</b>

**BK Case #25-10606-LSS; Debtor: Leisure Investments Holdings LLC**

Date	Attorney	Category	Notes	Time	Rate	Total
11/6/25	CS	B110	Receipt and review hearing Agenda	.1	\$650.00	\$65.00
11/10/25	CS	B110	Receipt and review revised notice of Agenda for November 10 <sup>th</sup> hearing	.1	\$650.00	\$65.00
11/17/25	CS	B110	Receipt and calendar notice of scheduling Omnibus Hearing for 1/7/2026	.1	\$650.00	\$65.00
		B110	TOTAL:	0.3		\$195.00
11/4/25	CS	B130	Receipt and review letter to Court re: sale of Marine Land	1	\$650.00	\$650.00
11/4/25	CS	B130	Teleconference with Debtor's counsel Allison Mieke and Sean Greacher re: Marine Land and sale update	.5	\$650.00	\$325.00
11/4/25	CS	B130	Teleconference with Committee Chair re: Marine Land sale.	.3	\$650.00	\$195.00
11/4/25	CS	B130	Exchange emails with FA re: Debtor's call and Marine Land sale	.2	\$650.00	\$130.00
11/6/25	CS	B130	Receipt and review Debtors' Reply in support of sale of Marine Land	.4	\$650.00	\$260.00
11/6/25	CS	B130	Receipt and review Debtors' reply in support of sale of animals to Theatre of the Seas	.2	\$650.00	\$130.00
11/6/25	CS	B130	Receipt and review Declaration of Harold J. Bordwin	.2	\$650.00	\$130.00
11/6/25	CS	B130	Receipt and review DIP Lenders' and Prepetition First Lien Noteholders' Joint in Debtors' reply	.1	\$650.00	\$65.00
11/6/25	CS	B130	Receipt and review Declaration of Jakub Mlexzko	.2	\$650.0	\$130.00
11/6/25	CS	B130	Receipt and review Declaration of Robert	0.2	\$650.00	\$130.00

			Wagstaff in Support of Marineland proposed sale.			
11/6/25	CS	B130	Receipt and review Declaration of Robert Wagstaff in support of transfer of certain animals	.2	\$650.00	\$130.00
11/6/25	CS	B130	Receipt and review Revised Proposed Sale Order of Marine Land	1	\$650.00	\$650.00
11/6/25	CS	B130	Receipt and review Revised proposed order of sale of certain Florida assets (animals)	1	\$650.00	\$650.00
11/6/25	CS	B130	Teleconference with Debtor's counsel Allison Mielke, Esq. re: Marine Land Sale and upcoming hearing	.3	\$650.00	\$195.00
11/7/25	CS	B130	Receipt and review Debtors' witness list for hearing	.2	\$650.00	\$130.00
11/10/25	CS	B130	Teleconference with Co-counsel re: auction of Marine Land	.2	\$650.00	\$130.00
11/10/25	CS	B130	Attend auction of Marine Land	1	\$650.00	\$650.00
11/10/25	CS	B130	Teleconference with Committee re: Marine Land auction and sale	.4	\$650.00	\$260.00
11/10/25	CS	B130	Teleconference with Debtors' counsel re: Marine Land sale and APA	.2	\$650.00	\$130.00
11/10/25	CS	B130	Receipt and review APA for Marine Land and schedules; email to committee re: same	1.1	\$650.00	\$715.00
11/11/25	CS	B130	Review notice of successful and backup bidder re: Marine Land	.2	\$650.00	\$130.00
11/12/25	CS	B130	Review revised proposed sale order re: Marine Land; review Amended agenda hearing notice	.4	\$650.00	\$260.00
11/12/25	CS	B130	Email to committee re: sale hearing	.2	\$650.00	\$130.00
11/13/25	CS	B130	Review and translate objection to sale of Mexican assets fled	.8	\$650.00	\$520.00

			by Jose Luie Padilla Magana and Mariana Padilla Alanis			
11/13/25	CS	B130	Receipt and translate objection to Mexican sale from Fidel	.4	\$650.00	\$260.00
11/17/25	CS	B130	Review letter of opposition to sale of Mexican Assets	.5	\$650.00	\$325.00
11/19/25	CS	B130	Receipt and review transfer agreement for animals from Miami Seaquarium.	1	\$650.00	\$650.00
11/19/25	CS	B130	Teleconference with Debtor's counsel Allison Mielke, Esq. re: transferring agreement of animals	.3	\$650.00	\$195.00
11/19/25	CS	B130	Teleconference with co-counsel re: transferring agreement of animals	.2	\$650.00	\$130.00
11/19/25	CS	B130	Research and analyze case law re: 363 sales and Mexico enforcement	1.3	\$650.00	\$845.00
11/19/25	CS	B130	Teleconference with Committee Chair re: animal transfer and Mexican sale update	.4	\$650.00	\$260.00
11/20/25	CS	B130	Review revised notice of transfer of animals; email to Debtor's counsel re: changes and comments	.5	\$650.00	\$325.00
11/20/25	CS	B130	Exchange emails with Debtors' counsel re: transfer of animal agreements and comments	.2	\$650.00	\$130.00
11/28/25	CS	B130	Receipt and review 2nd notice of transfer of animals, Wagstaff declaration and proposed sale order	1	\$650.00	\$650.00
		B130	TOTAL:	16.3		\$10,595.00
11/4/25	KB	B150	Draft meeting agenda	.5	\$250.00	\$125.00
11/6/25	CS	B150	Prepare for and attend Monthly Committee Conference Call	.8	\$650.00	\$520.00
11/6/25	KB	B150	Attend Monthly Conference Call meeting	.8	\$250.00	\$200.00
11/6/25	KB	B150	Draft meeting minutes from Monthly Committee Meeting	.5	\$250.00	\$125.00

11/6/25	CS	B150	Receipt and review meeting minutes from Committee Meeting Call	.1	\$650.00	\$65.00
		B150	TOTAL:	2.7		\$1,035.00
11/6/25	CS	B160	Receipt and review Greenhill's 3rd and 4th Monthly Fee Application	.2	\$650.00	\$130.00
11/14/25	CS	B160	Review and approve 1st Quarterly Fee Statement	.2	\$650.00	\$130.00
		B160	TOTAL:	0.4		\$260.00
11/11/25	CS	B170	Review notice of filing seventh supplement to list of ordinary course professionals	.2	\$650.00	\$130.00
11/17/25	CS	B170	Receipt and review Young Conaway's 7th Fee Application, Notice of 2nd Interim Fee Application and Supplement	.4	\$650.00	\$260.00
11/18/25	CS	B170	Teleconference with co-counsel re: case status and Debtor's fee apps	.3	\$650.00	\$195.00
11/18/25	CS	B170	Receipt and receive 5th monthly application of Greenhill	.2	\$650.00	\$130.00
		B170	TOTAL:	1.1		\$715.00
11/10/25	CS	B190	Prepare for and attend status conference hearing	.7	\$650.00	\$455.00
11/12/25	CS	B190	Attend hearing on sale of Marine Land and Theatre of Sea sale	1	\$650.00	\$650.00
		B190	TOTAL:	1.7		\$1,105.00
11/18/25	CS	B210	Research case law re: pierce corporate veil by creditors or trustee	2.3	\$650.00	\$1,495.00
11/24/25	CS	B210	Research case law re: pierce corporate veil by creditors or trustee related to collection of sanctions against Albor	2.2	\$650.00	\$1,430.00
		B210	TOTAL:	4.5		\$2,925.00

11/17/25	CS	B320	Receipt and review order extending plan deadlines; calendar same	.2	\$650.00	\$130.00
		B320	TOTAL:	0.2		\$130.00

**EXHIBIT B****Summary of Hours Billed by Professionals and Paraprofessional for the Fee Period**

Name of Professional	Dept.	Title	Year Admitted	Hourly Rate	Total Hours Billed	Total Compensation
Christian Savio	Bankruptcy	Partner	2010	\$650.00	25.4	\$16,510.00
Katie Belton	Bankruptcy	Paralegal		\$250.00	1.8	\$450.00
				<b>Totals</b>	<b>27.2</b>	<b>\$16,960.00</b>
BLENDED RATE				<b>\$623.53</b>		



1900 NW Corporate Blvd., Ste 200W  
Boca Raton, FL 33431

## INVOICE

Invoice # 10420  
Date: 12/01/2025  
Due On: 12/31/2025

Official Committee of Unsecured Creditors of Leisure Investments Holdings LLC

### 05598-Official Committee of Unsecured Creditors of Leisure Investments Holdings LLC

### BK Case #25-10606-LSS; Debtor: Leisure Investments Holdings LLC

Date	Attorney	Type	Notes	Quantity	Rate	Total
11/04/2025	CS	Service	Fees: Receipt and review lettres to Court re: sale of Marine Land.	1.00	\$650.00	\$650.00
11/04/2025	CS	Service	Fees: Teleconference with Debtor's counsel Allison Mieke and Sean Greacher re: Marine Land and sale update.	0.50	\$650.00	\$325.00
11/04/2025	KB	Service	Fees: Draft meeting agenda.	0.50	\$250.00	\$125.00
11/04/2025	CS	Service	Fees: Teleconference with Committee Chair re: Marine Land sale.	0.30	\$650.00	\$195.00
11/04/2025	CS	Service	Fees: Exchange emails with FA re: Debtor's call and Marine Land sale.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review Greenhill's 3rd and 4th Monthly Fee Application.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review Debtors' Reply in support of sale of Marine Land.	0.40	\$650.00	\$260.00
11/06/2025	CS	Service	Fees: Receipt and review Debtors' reply in support of sale of animals to Threatre of the Seas.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review Declaration fo Harold J. Bordwin.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review DIP Lenders' and Prepetition First Lien Noteholders' Joint in Debtors' reply.	0.10	\$650.00	\$65.00
11/06/2025	CS	Service	Fees: Receipt and review Declaration of Jakub Mlexzko.	0.20	\$650.00	\$130.00

11/06/2025	CS	Service	Fees: Receipt and review Declaration of Robert Wagstaff in Support of Marineland proposed sale.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review Declaration of Robert Wagstaff in support of transfer of certain animals.	0.20	\$650.00	\$130.00
11/06/2025	CS	Service	Fees: Receipt and review Revised Proposed Sale Order of Marine Land.	1.00	\$650.00	\$650.00
11/06/2025	CS	Service	Fees: Receipt and review Revised proposed order of sale of certain Florida assets (animals).	1.00	\$650.00	\$650.00
11/06/2025	CS	Service	Fees: Prepare for and attend Monthly Committee Conference Call.	0.80	\$650.00	\$520.00
11/06/2025	KB	Service	Fees: Attend Monthly Conference Call meeting.	0.80	\$250.00	\$200.00
11/06/2025	KB	Service	Fees: Draft meeting minutes from Monthly Committee Meeting.	0.50	\$250.00	\$125.00
11/06/2025	CS	Service	Fees: Receipt and review meeting minutes from Committee Meeting Call.	0.10	\$650.00	\$65.00
11/06/2025	CS	Service	Fees: Receipt and review notice of hearing agenda.	0.10	\$650.00	\$65.00
11/06/2025	CS	Service	Fees: Teleconference with Debtor's counsel Allison Mielke, Esq. re: Marine Land Sale and upcoming hearing.	0.30	\$650.00	\$195.00
11/07/2025	CS	Service	Fees: Receipt and review Debtors' witness list for hearing.	0.20	\$650.00	\$130.00
11/10/2025	CS	Service	Fees: Teleconference with Co-counsel re: auction of Marine Land.	0.20	\$650.00	\$130.00
11/10/2025	CS	Service	Fees: Receipt and review revised notice of agenda for Nov. 10th hearing.	0.10	\$650.00	\$65.00
11/10/2025	CS	Service	Fees: Prepare for and attend status conference hearing.	0.70	\$650.00	\$455.00
11/10/2025	CS	Service	Fees: Attend auction of Marine Land.	1.00	\$650.00	\$650.00
11/10/2025	CS	Service	Fees: Teleconference with Committee re: Marine Land auction and sale.	0.40	\$650.00	\$260.00
11/10/2025	CS	Service	Fees: Teleconference with Debtors' counsel re: Marine Land sale and APA.	0.20	\$650.00	\$130.00

11/10/2025	CS	Service	Fees: Receipt and review APA for Marine Land and schedules; email to committee re: same.	1.10	\$650.00	\$715.00
11/11/2025	CS	Service	Fees: Review notice of successful and backup bidder re: Marine Land.	0.20	\$650.00	\$130.00
11/11/2025	CS	Service	Fees: Review notice of filing seventh supplement to list of ordinary course professionals.	0.20	\$650.00	\$130.00
11/12/2025	CS	Service	Fees: Review revised proposed sale order re: Marine Land; review Amended agenda hearing notice.	0.40	\$650.00	\$260.00
11/12/2025	CS	Service	Fees: Email to committee re: sale hearing.	0.20	\$650.00	\$130.00
11/12/2025	CS	Service	Fees: Attend hearing on sale of Marine Land and Threatre of Sea sale.	1.00	\$650.00	\$650.00
11/13/2025	CS	Service	Fees: Review and translate objection to sale of Mexican assets fled by Jose Luie Padilla Magana and Mariana Padilla Alanis.	0.80	\$650.00	\$520.00
11/13/2025	CS	Service	Fees: Receipt and translate objection to Mexican sale from Fidel.	0.40	\$650.00	\$260.00
11/14/2025	CS	Service	Fees: Review and approve 1st Quaterly Fee Statement.	0.20	\$650.00	\$130.00
11/17/2025	CS	Service	Fees: Review letter of opposition to sale of Mexican Assets.	0.50	\$650.00	\$325.00
11/17/2025	CS	Service	Fees: Receipt and review order extending plan deadlines; caldendar same.	0.20	\$650.00	\$130.00
11/17/2025	CS	Service	Fees: Receipt and calendar notice of scheduling Omnibus Hearing for 1/7/ 2026.	0.10	\$650.00	\$65.00
11/17/2025	CS	Service	Fees: Receipt and review Young Conaway's 7th Fee Application; Notice of 2nd Interim Fee Application and Supplement.	0.40	\$650.00	\$260.00
11/18/2025	CS	Service	Fees: Teleconference with co-counsel re: case status and Debtor's fee apps.	0.30	\$650.00	\$195.00
11/18/2025	CS	Service	Fees: Receipt and receive 5th monthly application of Greenhill.	0.20	\$650.00	\$130.00
11/18/2025	CS	Service	Fees: Research case law re: pierce corporate veil by creditors or trustee.	2.30	\$650.00	\$1,495.00

11/19/2025	CS	Service	Fees: Receipt and review transfer agreement for animals from Miami Seaquarium.	1.00	\$650.00	\$650.00
11/19/2025	CS	Service	Fees: Teleconference with Debtor's counsel Allison Mielke, Esq. re: transferring agreement of animals.	0.30	\$650.00	\$195.00
11/19/2025	CS	Service	Fees: Teleconference with co-counsel re: transferring agreement of animals.	0.20	\$650.00	\$130.00
11/19/2025	CS	Service	Fees: Research and analyze case law re: 363 sales and Mexico enforcement.	1.30	\$650.00	\$845.00
11/19/2025	CS	Service	Fees: Teleconference with Committee Chair re: animal transfer and Meixcan sale update.	0.40	\$650.00	\$260.00
11/20/2025	CS	Service	Fees: Review revised notice of transfer of animals; email to Debtor's counsel re: changes and comments.	0.50	\$650.00	\$325.00
11/20/2025	CS	Service	Fees: Exchange emails with Debtors' counsel re: transfer of animal agreements and comments.	0.20	\$650.00	\$130.00
11/24/2025	CS	Service	Fees: Research case law re: pierce corporate veil by creditors or trustee related to collection of sactions against Albor.	2.20	\$650.00	\$1,430.00
11/28/2025	CS	Service	Fees: Receipt and review 2nd notice of transfer of animals, Wagstaff declaration and proposed sale order.	1.00	\$650.00	\$650.00
				<b>Quantity Subtotal</b>		<b>27.2</b>
				<b>Quantity Total</b>		<b>27.2</b>
				<b>Subtotal</b>		<b>\$16,960.00</b>
				<b>Total</b>		<b>\$16,960.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8323	08/27/2025	\$71,565.00	\$57,252.00	\$14,313.00

8742	09/18/2025	\$31,235.00	\$24,988.00	\$6,247.00
9125	10/15/2025	\$28,270.00	\$22,616.00	\$5,654.00
9613	10/31/2025	\$8,050.00	\$6,440.00	\$1,610.00
10046	12/03/2025	\$16,310.00	\$0.00	\$16,310.00

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
10420	12/31/2025	\$16,960.00	\$0.00	\$16,960.00
<b>Outstanding Balance</b>				<b>\$61,094.00</b>
<b>Total Amount Outstanding</b>				<b>\$61,094.00</b>

Please make all amounts payable to: MLS, P.A.

Please pay within 30 days.

**EXHIBIT C**

**Summary of Expenses for the Fee Period**

<b>Description</b>	<b>Amounts</b>
N/A	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**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)

**Objection Deadline: January 5, 2026 at 4:00 p.m. (ET)**

**NOTICE OF SIXTH MONTHLY APPLICATION OF THE  
LAW OFFICES OF MANGANELLI, LEIDER & SAVIO, P.A. FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL  
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE  
PERIOD FROM NOVEMBER 1, 2025, THROUGH AND INCLUDING NOVEMBER 30, 2025**

**PLEASE TAKE NOTICE** that on December 15, 2025, The Law Offices of Manganelli, Leider & Savio, P.A. (“**ML&S**”), co-counsel to the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned matter, filed and caused to be served the *Sixth Monthly Application of The Law Offices of Manganelli, Leider & Savio, P.A. for Compensation and Reimbursement of Expenses as Co-Counsel to the Official Committee of Unsecured Creditors for the Period from November 1, 2025 through and Including November 30, 2025* (the “**Monthly Fee Application**”) seeking compensation for the reasonable and necessary services rendered to the Committee in the amount of \$16,960.00 and reimbursement for actual and necessary expenses in the amount of \$0. A copy of the Monthly Fee Application is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that objections or responses to the Monthly Fee Application, if any, must be made in writing and filed with the United States Bankruptcy Court for the

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<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.

District of Delaware, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 (the “**Court**”), on or before **January 5, 2026 at 4:00 p.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon (i) the Debtors, c/o Riveron Management Services, LLC, 600 Brickell Avenue, Suite 2550, Miami, FL 33131, Attn: Robert Wagstaff (robert.wagstaff@riveron.com) and Michael Flynn (michael.flynn@riveron.com); (ii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 N. King Street, Wilmington, Delaware 19801, Attn: Sean T. Greecher (sgreecher@ycst.com) and Allison S. Mielke (amielke@ycst.com); (iii) counsel to the Prepetition First Lien Noteholders and the DIP Lenders, (a) Baker & McKenzie LLP, 830 Brickell Plaza, Suite 3100, Miami, Florida 33131, Attn: Paul J. Keenan Jr. (paul.keenan@bakermckenzie.com); (iv) counsel to the DIP Agent, (a) Troutman Pepper Locke LLP, Hercules Plaza, Suite 1000, 1313 N. Market Street, P.O. Box 1709, Wilmington, Delaware 19899, Attn: Evelyn J. Meltzer (evelyn.meltzer@troutman.com) and (b) Foley & Lardner LLP, 111 Huntington Avenue, Suite 2500, Boston, Massachusetts 02199, Attn: Adrienne K. Walker (awalker@foley.com); (v) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 North King Street, Suite 2207, Wilmington, Delaware 19801, Attn: Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov); and (vi) undersigned co-counsel to the Official Committee of Unsecured Creditors (collectively, the “**Application Recipients**” and each, an “**Application Recipient**”).

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE MONTHLY FEE APPLICATION MAY BE PAID PURSUANT TO THE COMPENSATION PROCEDURES ORDER WITHOUT FURTHER**

HEARING OR ORDER OF THE COURT.

**PLEASE TAKE FURTHER NOTICE THAT IF A TIMELY OBJECTION IS FILED AND SERVED, THEN PAYMENT WILL BE MADE ACCORDING TO THE PROCEDURES SET FORTH IN THE COMPENSATION PROCEDURES ORDER.**

**PLEASE TAKE FURTHER NOTICE THAT HEARING ON THE MONTHLY FEE APPLICATION WILL BE HELD ONLY IF OBJECTIONS OR RESPONSES ARE TIMELY FILED.**

Dated: December 15, 2025

**RAINES FELDMAN LITRELL LLP**

/s/ Thomas J. Francella, Jr.

Thomas J. Francella, Jr. (No. 3835)

Mark W. Eckard (No. 4542)

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-and-

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

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csavio@mls-pa.com

*Co-Counsel to the Committee of Unsecured Creditors*