

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:

February 23, 2026 at 2:00 p.m. (ET)

Objection Deadline:

February 4, 2026 at 4:00 p.m. (ET)

**DEBTORS' THIRD MOTION FOR ENTRY OF AN ORDER EXTENDING THE
EXCLUSIVE PERIODS FOR THE FILING OF A CHAPTER 11 PLAN
AND SOLICITATION OF ACCEPTANCES THEREOF**

Leisure Investments Holdings LLC, and certain of its affiliates (each, a “**Debtor**” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (collectively, the “**Chapter 11 Cases**”), hereby file this motion (this “**Motion**”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), extending each of the Exclusive Periods (as defined below) by approximately ninety (90) days. In support of this Motion, the Debtors rely upon and incorporate by reference the *Declaration of Steven Robert Strom in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 10] (the “**First Day Declaration**”).² In further support of this Motion, the Debtors respectfully state as follows:

¹ Due to the large number of Debtors in these chapter 11 cases a complete list of the Debtors is not provided herein. A complete list of the Debtors along with the last four digits of their tax identification numbers, where applicable, may be obtained on the website of the Debtors’ noticing and claims agent at <https://veritaglobal.net/dolphinco>, or by contacting counsel for the Debtors. 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.



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JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “**Court**”) has jurisdiction to consider this Motion 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. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and, pursuant to rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the Debtors consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

3. The statutory and legal predicates for the relief requested herein are section 1121(d) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Local Rule 9006-1.

BACKGROUND

A. General Background

4. On March 31, 2025 (the “**Commencement Date**”), certain of the Debtors (the “**Initial Debtors**”) filed voluntary petitions pursuant to chapter 11 of the Bankruptcy Code. On April 16, 2025 and May 4, 2025, affiliates Controladora Dolphin, S.A. de C.V. (“**Controladora**”) and Embassy of the Seas Limited (“**Embassy**”), respectively, also filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered for procedural purposes only. *See* Docket Nos. 32, 68 & 126. The

Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On May 6, 2025, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Committee**”). See Docket Nos. 128 & 151.

6. Additional information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in detail in the First Day Declaration.

B. The Current Exclusive Periods

7. On August 11, 2025, the Bankruptcy Court entered the *Order Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicit Acceptances Thereof* [Docket No. 441] (the “**First Exclusivity Order**”) extending the Debtors’ Plan Periods and Solicitation Periods (each as defined below) as follows: (i) for the Initial Debtors, through and including October 27, 2025 and December 29, 2025, respectively; (ii) for Controladora, through and including November 12, 2025 and January 12, 2026, respectively; and (iii) for Embassy, through and including December 1, 2025 and January 29, 2026, respectively.

8. On November 14, 2025, the Bankruptcy Court entered the *Order Further Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances Thereof* [Docket No. 744] (the “**Second Exclusivity Order**”), further extending the Debtors’ Plan Periods and Solicitation Periods (each as defined below) as follows: (i) for the Initial Debtors, through and including January 26, 2026 and March 30, 2026, respectively; (ii) for Controladora, through and including February 10, 2026 and April 13, 2026, respectively; and (iii) for Embassy, through and including March 2, 2026 and April 29, 2026, respectively. The Debtors now seek to further extend

these Exclusive Periods (as defined below) so that they may continue to move the Chapter 11 Cases forward without distraction from potential competing plans.

9. As detailed herein, the Debtors have diligently prosecuted the Chapter 11 Cases despite challenging circumstances and are currently pursuing the sale of substantially all of their assets over the coming months, with several asset transactions already having been consummated. The Debtors submit that maintaining their exclusive right to file and solicit votes on a chapter 11 plan is essential to their ability to consummate these sales, after which they will promptly transition to seeking confirmation of a chapter 11 plan.

RELIEF REQUESTED

10. By this Motion, the Debtors request entry of the Proposed Order extending the Plan Periods and Solicitation Periods (each as defined below) by approximately ninety (90) days, as follows: (i) for the Initial Debtors, through and including April 27, 2026 and June 29, 2026, respectively; (ii) for Controladora, through and including May 11, 2026 and July 13, 2026, respectively; and (iii) for Embassy, through and including June 1, 2026 and July 28, 2026, respectively, without prejudice to the Debtors' right to seek additional extensions of the Exclusive Periods.³

BASIS FOR RELIEF

11. Section 1121(b) of the Bankruptcy Code provides for an initial period of 120 days after commencement of a chapter 11 case during which a debtor has the exclusive right to propose and file a chapter 11 plan (with respect to a Debtor, the "**Plan Period**" and, with respect to the Debtors, the "**Plan Periods**"). If a debtor files a plan during the Plan Period, section 1121(c)(3)

³ Pursuant to Rule 9006-1 of the Local Rules, the filing of this Motion prior to the expiration of the current Exclusive Periods shall automatically extend the Exclusive Periods until the Court acts on this Motion without the necessity for entry of a bridge order. *See* Del. Bankr. L.R. 9006-1.

of the Bankruptcy Code provides a debtor with an additional 60 days following the expiration of such Plan Period (or 180 days following the commencement of the case) to solicit acceptances of the plan without competing plan filings (with respect to a Debtor, the “**Solicitation Period**” and, with respect to the Debtors, the “**Solicitation Periods**,” together with the Plan Period, the “**Exclusive Periods**”). Section 1121(d) of the Bankruptcy Code permits the Court to extend the Exclusive Periods for “cause.” For the reasons set forth herein, “cause” exists to further extend the Exclusive Periods.

I. Section 1121(d) of the Bankruptcy Code Permits the Court to Extend the Exclusive Periods “for Cause”

12. The Exclusive Periods are designed to provide a debtor with a full and fair opportunity to propose a consensual plan and solicit acceptances of such plan, without disruption to the administration of the estate that may result from the filing of competing plans by non-debtor parties. To this end, where the Exclusive Periods prove to be unfeasible timeframes, section 1121(d) of the Bankruptcy Code allows the Court to extend such Exclusive Periods for cause.⁴ Although the Bankruptcy Code does not define the term “cause,” the legislative history indicates it is intended to be a flexible standard to balance the competing interests of a debtor and its creditors. *See* H.R. REP. NO. 95–595, at 231–32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5787, 6191 (noting that Congress intended to give bankruptcy courts flexibility to protect a debtor’s interests by allowing unimpeded opportunity to negotiate settlement of debts without interference from other parties in interest).

⁴ Pursuant to section 1121(d)(2)(A) of the Bankruptcy Code, the Plan Period may not be extended beyond a date that is 18 months after the commencement of a chapter 11 case. Pursuant to section 1121(d)(2)(B) of the Bankruptcy Code, the Solicitation Period may not be extended beyond a date that is 20 months after the commencement of a chapter 11 case.

13. Congress built flexibility into section 1121 of the Bankruptcy Code to give a debtor sufficient opportunity to stabilize its business operations at the outset of its chapter 11 case and to negotiate an effective plan with its creditors. *See In re Newark Airport/Hotel Ltd. P'ship*, 156 B.R. 444, 451 (Bankr. D. N.J.), *aff'd*, 155 B.R. 93 (D.N.J. 1993) (noting that Congress designed chapter 11 provisions to enable a debtor to remain in control for some period of time, thereby making reorganization an attractive alternative to financially troubled companies); *see also Gaines v. Perkins (In re Perkins)*, 71 B.R. 294, 297–98 (W.D. Tenn. 1987) (Congress designed section 1121 of the Bankruptcy Code to give the debtor time to reach an agreement with its creditors regarding a plan of reorganization.).

14. In making the determination to affirm or deny a request to extend the Exclusive Periods for “cause,” courts have considered a variety of factors, including:

- (a) the size and complexity of the debtor’s case;
- (b) the necessity of sufficient time to negotiate and prepare adequate information;
- (c) the existence of good-faith progress towards reorganization;
- (d) whether the debtor is paying its debts as they become due;
- (e) whether the debtor has made progress negotiating with creditors;
- (f) the length of time a case has been pending;
- (g) whether the debtor is seeking an extension to pressure creditors; and
- (h) whether or not unresolved contingencies exist.

In re Cent. Jersey Airport Servs., LLC, 228 B.R. 176, 184 (Bankr. D.N.J. 2002) (citations omitted); *see also In re McLean Indus., Inc.*, 87 B.R. 830, 834 (Bankr. S.D.N.Y. 1987) (citing to most of the factors listed above in determining whether to extend the exclusive periods); *In re United Press Int’l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (holding that the debtor showed “cause” to extend its exclusive period based upon certain of the above-quoted factors).

15. Not all of the above factors are relevant to every case, and courts may consider the relevant subset of factors to determine whether cause exists to grant an exclusivity extension in a particular chapter 11 case. *See, e.g., In re Express One Int'l, Inc.*, 194 B.R. 98, 100-01 (Bankr. E.D. Tex. 1996) (identifying four of the factors as relevant in determining whether “cause” exists to extend exclusivity); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (finding that the debtor showed “cause” to extend exclusivity based upon three of the factors); *In re Pine Run Tr., Inc.*, 67 B.R. 432, 435 (Bankr. E.D. Pa. 1986) (relying on two factors in holding that cause existed to extend exclusivity). As detailed below, the facts and circumstances of the Chapter 11 Cases justify extending the Exclusive Periods.

II. Cause Exists for an Extension of the Exclusive Periods

16. Cause exists to further extend the Exclusive Periods given the continued progress the Debtors have made in the Chapter 11 Cases. In the time since the Court entered the Second Exclusivity Order, the Debtors and their advisors have expended significant resources to preserve and maximize the value of the Debtors’ estates for the benefit of all stakeholders. Specifically, the Debtors have, among other things: (a) marketed and sold their Marineland operations as a going concern; (b) marketed and assigned their interests in the Miami Seaquarium facility, subject to various governmental authorizations; (c) negotiated and documented agreements for and coordinated the safe transfer of the Debtors’ animals located at certain of their Florida facilities, and obtained certain orders approving the transfers of such animals [Docket Nos. 800, 825, 853 & 865]; (d) continued the marketing and sale process for their operations in Mexico and ownership interests of certain subsidiaries operating in Italy, resulting in the receipt of several bidding proposals that the Debtors have negotiated and are in the process of documenting; (e) engaged in contentious litigation in Mexico involving the Debtors’ former management to preserve the Debtors’ assets and stabilize their operations at various Mexican facilities; (f) continued to operate

their facilities in Mexico and the U.S. and/or facilitated the wind down of such operations, where applicable; and (g) otherwise administered the Chapter 11 Cases, including having filed monthly operating reports [Docket Nos. 833-849], responded to various creditor inquiries, submitted and managed postpetition financing obligations, and handled other various tasks.

17. As the Debtors have acknowledged, the initial months following the Commencement Date were dominated by the Debtors' efforts to stabilize their businesses and gain access full access to their own books and records. Since achieving control of the majority of their operations, the Debtors have worked diligently to run an effective sale and marketing process and progress the Chapter 11 Cases. The Debtors submit that a third extension of the Exclusive Periods is appropriate and necessary to afford the Debtors sufficient time to complete the sale process and prosecute a chapter 11 plan that will implement the Debtors' go-forward strategy.

III. Other Relevant Factors Favor Extending the Exclusive Periods

A. The Size, Complexity, and Duration of the Chapter 11 Cases

18. Since the Exclusive Periods were first extended, Debtors have continued to work with parties in interest, including the Debtors' prepetition and postpetition lenders, the Committee, the U.S. Trustee, and others to pursue the sale process and maintain case momentum despite a variety of operational and other challenges. The Debtors and their professionals have devoted substantial time, energy, and resources to reach this point in the Chapter 11 Cases. Specifically, the Debtors and certain of their subsidiaries operate (or, alternatively, have wound down during the Chapter 11 Cases) dolphin facilities in eight countries, including the United States and Mexico, and are pursuing sale efforts in each of those jurisdictions. As a result of those efforts, the Debtors have sold or wound down three of their four facilities in the United States, including effectuating the safe transfer of the animals housed at certain of such facilities to responsible third parties. In tandem, the Debtors continue to defend against warrantless litigation efforts in Mexico by former

management to gain control over the Debtors' assets. The Debtors have successfully defended against these litigation tactics, but must diligently continue to engage in substantial litigation to ensure that the Debtors' assets are preserved and maintained for the benefit of creditors and stakeholders. The complexity of the various issues addressed, and the time, effort, and planning required to obtain the progress made thus far warrant the requested extension of the Exclusive Periods.

B. Good Faith Progress Made in the Chapter 11 Cases

19. The requested extension of the Exclusive Periods is reasonable given the current status of the Chapter 11 Cases and the progress achieved to date. As detailed above, the Debtors have made significant progress in the Chapter 11 Cases. The Debtors are currently in the process of documenting the proposed disposition of their Mexican assets and anticipate submitting to the Court a chapter 11 plan that will effectuate the Debtors go-forward strategy. As the Debtors move toward confirmation and the eventual wind down of their estates, the Debtors and their professionals will continue to focus on maximizing the value of their estates by efficiently managing ongoing chapter 11 administrative tasks for the benefit of their stakeholders. An extension of the Exclusive Periods as requested herein will allow the Debtors to finalize a chapter 11 plan that meets the requirements of the Bankruptcy Code and effectuates the Debtors' ultimate sale and asset disposition strategy. Accordingly, the Debtors' efforts to date and the tasks that remain to be completed justify the extension of the Exclusive Periods.

C. The Necessity of Sufficient Time to Negotiate and Prepare Adequate Information

20. As discussed in numerous hearings before the Court, the Debtors and their professionals have expended, and will continue to expend, substantial resources to maintain control over their books, records, and operations. Even so, the Debtors have diligently pursued their marketing and sale strategy, which is nearing consummation. The Debtors require additional

time to submit a chapter 11 plan that effectuates the Debtors' sale transactions and ultimate wind down strategy. Accordingly, the Debtors submit that this factor weighs in favor of extending the Exclusive Periods.

D. The Debtors Are Paying Their Debts as They Come Due

21. The Debtors continue to pay undisputed postpetition obligations on a timely basis. As such, the requested extension of the Exclusive Periods will afford the Debtors a meaningful opportunity to solicit votes on a plan and negotiate with key parties to confirm a plan without prejudice to the parties in interest in the Chapter 11 Cases.

E. The Debtors Are Not Seeking an Extension to Pressure Creditors

22. Throughout the chapter 11 process, the Debtors have endeavored to establish and maintain cooperative working relationships with their primary creditor constituencies. Importantly, the Debtors are not seeking the extension of the Exclusive Periods to delay administration of the Chapter 11 Cases or to exert pressure on their creditors, but rather to continue the orderly, efficient, and cost-effective chapter 11 process. Thus, this factor also weighs in favor of the requested extension of the Exclusive Periods.

F. Termination of the Debtors' Exclusive Periods Would Adversely Impact the Chapter 11 Cases

23. Termination of the Exclusive Periods would adversely impact the Debtors' efforts to preserve and maximize the value of the estates and the progress of the Chapter 11 Cases. If the Court were to deny the Debtors' request for an extension of the Exclusive Periods, any party in interest would be permitted to propose an alternative chapter 11 plan for the Debtors, which would only foster a chaotic environment and cause opportunistic parties to engage in counterproductive behavior in pursuit of alternatives that are neither value-maximizing nor feasible under the circumstances of the Chapter 11 Cases. Allowing the Debtors a sufficient opportunity to market

their assets and pursue a structured and transparent process will streamline the Chapter 11 Cases, reduce expense, and otherwise maximize the value of the Debtors' estates.

24. Based upon the foregoing, the Debtors respectfully submit that cause exists to extend the Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code. Specifically, the Debtors request that the Plan Periods and Solicitation Periods be extended as follows: (i) for the Initial Debtors, through and including April 27, 2026 and June 29, 2026, respectively; (ii) for Controladora, through and including May 11, 2026 and July 13, 2026, respectively; and (iii) for Embassy, through and including June 1, 2026 and July 28, 2026, respectively, without prejudice to the Debtors' right to seek additional extensions of the Exclusive Periods.

NOTICE

25. Notice of this Motion will be provided to: (a) the U.S. Trustee; (b) counsel to the Committee; (c) counsel to the Prepetition First Lien Noteholders and DIP Lenders; (d) counsel to the DIP Agent; (e) counsel to the Prepetition Second Lien Noteholders; (f) counsel to the Prepetition First Lien Collateral Agent and the Prepetition Second Lien Collateral Agent; and (g) all parties that have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

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CONCLUSION

WHEREFORE, the Debtors request entry of the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: January 21, 2026
Wilmington, Delaware

/s/ Allison S. Mielke

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Counsel to the Debtors and Debtors in Possession

**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:

February 23, 2026, at 2:00 p.m. (ET)

Objection Deadline:

February 4, 2026, at 4:00 p.m. (ET)

NOTICE OF MOTION

PLEASE TAKE NOTICE that the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) have filed the *Debtors’ Third Motion for Entry of an Order Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances Thereof* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be filed on or before **February 4, 2026, at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801. At the same time, you must serve a copy of any objection upon the undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON FEBRUARY 23, 2026, AT 2:00 P.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.

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¹ Due to the large number of Debtors in these chapter 11 cases a complete list of the Debtors is not provided herein. A complete list of the Debtors along with the last four digits of their tax identification numbers, where applicable, may be obtained on the website of the Debtors’ noticing and claims agent at <https://veritaglobal.net/dolphinco>, or by contacting counsel for the Debtors. 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, IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: January 21, 2026

/s/ Allison S. Mielke

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EXHIBIT A

Proposed Order

**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)

Ref. Docket No. __

**THIRD ORDER EXTENDING THE EXCLUSIVE PERIODS FOR THE FILING OF A
CHAPTER 11 PLAN AND SOLICITATION OF ACCEPTANCES THEREOF**

Upon consideration of the motion (the “**Motion**”)² of the Debtors for the entry of an order extending the Plan Periods and Solicitation Periods (i) for the Initial Debtors, through and including April 27, 2026 and June 29, 2026, respectively; (ii) for Controladora, through and including May 11, 2026 and July 13, 2026, respectively; and (iii) for Embassy, through and including June 1, 2026 and July 28, 2026, respectively; and this Court having determined that this Court has jurisdiction to consider the Motion and the relief requested therein in accordance with 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; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice

¹ Due to the large number of Debtors in these chapter 11 cases a complete list of the Debtors is not provided herein. A complete list of the Debtors along with the last four digits of their tax identification numbers, where applicable, may be obtained on the website of the Debtors’ noticing and claims agent at <https://veritaglobal.net/dolphinco>, or by contacting counsel for the Debtors. 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

of the Motion and the hearing thereon having been given as set forth in the Motion; and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice need be provided; and it appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their creditors, their estates, and all other parties in interest; and after due deliberation and sufficient cause, therefore

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 1121(d) of the Bankruptcy Code, the Plan Period is extended (i) for the Initial Debtors, through and including April 27, 2026; (ii) for Controladora, through and including May 11, 2026; and (iii) for Embassy, through and including June 1, 2026.
3. Pursuant to section 1121(d) of the Bankruptcy Code, the Solicitation Period is extended (i) for the Initial Debtors, through and including June 29, 2026; (ii) for Controladora, through and including July 13, 2026; and (iii) for Embassy, through and including July 28, 2026.
4. The relief granted herein shall not prejudice the Debtors from seeking further extensions made pursuant to section 1121(d) of the Bankruptcy Code.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.