Docket #1502 Date Filed: 09/14/2026

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

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| In re: | Chapter 11 |
| LEISURE INVESTMENTS HOLDINGS LLC, *et al.*,[1] | Case No. 25-10606 (LSS) |
| | (Jointly Administered) |
| Debtors. | **Ref. Docket No. 55** |

**SUPPLEMENTAL DECLARATION OF ROBERT S. BRADY IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF YOUNG CONAWAY STARGATT & TAYLOR, LLP AS COUNSEL TO THE DEBTORS, EFFECTIVE AS OF THE PETITION DATE**

I, Robert S. Brady, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner in the firm of Young Conaway Stargatt & Taylor, LLP ("**Young Conaway**"), with principal offices at Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, and have been duly admitted to practice in the states of Delaware and New York and the District of Columbia, as well as the United States Court of Appeals for the Third Circuit, the United States District Courts for the District of Delaware and the Southern District of New York, and the United States Supreme Court.

2. On April 14, 2025, Leisure Investment Holdings LLC and its affiliated debtors and debtors-in-possession (collectively, the "**Debtors**") in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**") filed the *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Counsel to the Debtors,*

[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.

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*Effective as of the Petition Date* [Docket No. 55] (the "**Application**").[2] Attached to the Application as Exhibit A was my initial declaration in support of the Application (the "**Initial Declaration**"). On April 30, 2025, the Court entered an order [Docket No. 107] approving the relief requested in the Application.

3. In the Initial Declaration, Young Conaway set forth and described its conflicts and connections search and disclosed certain relationships with the interested parties in the Chapter 11 Cases (collectively, the "**Interested Parties**").

4. I submit this supplemental declaration (this "**Supplemental Declaration**") to supplement the Initial Declaration. Unless otherwise stated herein, I have personal knowledge of the facts set forth herein.

**DISCLOSURES**

5. Since the filing of the Application, Young Conaway has continued to monitor any potential conflicts that may arise with respect to its representation of the Debtors. Specifically, Young Conaway has continued to conduct searches within its databases to determine whether any of its newly opened engagements involve Interested Parties.

6. Recently, Riveron RTS, LLC ("**Riveron RTS**") engaged Young Conaway to provide legal representation in connection with certain discovery matters pending in the United States Bankruptcy Court for the Southern District of New York (the "**Riveron Matter**"). Upon information and belief, Riveron RTS is an affiliate of Riveron Management Services, LLC, a professional retained by the Debtors in connection with the Chapter 11 Cases [*see* Docket No. 106].

[2] Capitalized terms used but not otherwise defined herein have the meanings given to them in the Application.

7. In addition, PGIM Capital Partners VI, L.P. and certain affiliated funds (collectively, "**PGIM**") recently engaged Young Conaway to represent its interests as a lender and equity holder in a wholly unrelated chapter 11 proceeding pending in the Court (together with the Riveron Matter, the "**Unrelated Matters**"). Upon information and belief, PGIM is an affiliate of Prudential Insurance Company of America, Prudential Legacy Insurance Company of New Jersey, and Cigna Health and Life Insurance Company, which are secured creditors of the Debtors in the Chapter 11 Cases.

8. To the best of my knowledge, information, and belief, the Unrelated Matters are wholly unrelated to the Debtors and the Chapter 11 Cases, and neither Riveron RTS's nor PGIM's interests in connection with the Unrelated Matters are adverse to the interests of the Debtors in the Chapter 11 Cases.

9. Based upon its continued review of the Interested Parties, including Riveron RTS and PGIM, Young Conaway has determined that it does not represent any party in these proceedings with a material adverse interest with respect to the Debtors. Young Conaway will supplement this Supplemental Declaration, as necessary, with additional information or disclosures in the event that additional information is developed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: September 14, 2026
Wilmington, Delaware

*/s/ Robert S. Brady*
Robert S. Brady