Docket #1606 Date Filed: 11/09/2026

November 2, 2026

RECEIVED
2026 NOV -9 A 8:46
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

The Honorable Laurie S. Silverstein
United States Bankruptcy Court
District of Delaware

Re: In re Leisure Investments Holdings LLC, et al.
Chapter 11 Case No. 25-10606 (LSS)
Support for Review of the Marine Research Center Property

Dear Judge Silverstein:

We respectfully submit this letter in support of Felicia R. Cook's request that the Court examine the ownership, financial history, and treatment of the Marine Research Center, also known as the Field Station, located at 9509 N. Oceanshore Boulevard, St. Augustine, Florida.

Ms. Cook's letter dated October 13, 2026, raises substantive questions about the property and we support a thorough review of those questions and the supporting documentation that she identifies to determine whether the property was properly excluded from the bankruptcy estate and whether further action is warranted.

As described in Ms. Cook's letter, the Marine Research Center served numerous functions supporting Marineland Dolphin Adventure, including research, storage of equipment and historical materials, employee and intern housing, educational activities, and hurricane preparedness. These reported uses suggest a substantial operational relationship that merits careful consideration alongside the ownership and financing records.

Of particular significance are Ms. Cook's statements that Marineland Leisure, Inc. paid expenses associated with the property, including utilities, insurance, property taxes, maintenance, repairs, and replacement air-conditioning units. We respectfully support examination of the underlying records to determine what those expenditures establish concerning the property's acquisition, maintenance, control, and relationship to the business.

We also support review of the Mortgage Share Document and the Georgia Aquarium correspondence identified in her submission. Considered together with the relevant deeds, acquisition documents, financing agreements, and business records, these materials may assist the Court in resolving the questions raised about the property's legal status.

The Marine Research Center's reported role in preserving Marineland's historical records and artifacts deserves particular attention. Those materials represent an important connection to Marineland's history. Its described research, educational, and emergency

2510606261110000000000001

preparedness functions also underscore the practical importance of the facility to the continuing operation.

We recognize that operational use and payment of expenses do not, by themselves, resolve legal ownership. However, our support is for a complete and transparent examination of the evidence and for any resulting relief that the Court determines is supported by the record and applicable law.

If the Court determines that the property should have been included in the bankruptcy estate or otherwise addressed in these proceedings, we respectfully ask that it consider appropriate relief, including whether a lawful mechanism exists for the property to support the continuing mission of Marineland Waves of the Future, Inc.

Thank you for considering this letter and the concerns presented by Ms. Cook. We support her request for careful judicial review and a resolution that reflects the documented facts, protects the integrity of the proceedings, and appropriately considers the future of Marineland's operations and historical resources.

Respectfully submitted,



Jon and Barbara Rubel

Managing Partners

1 Apex Association, LLC

jfrubel@att.net

(770) 316-1493 (M)

UNITED STATES POSTAL SERVICE®

Click-N-Ship®

E

usps.com
$40.53
US POSTAGE

9470 1301 0935 5019 9052 69 0405 3000 0201 9801

U.S. POSTAGE PAID
Click-N-Ship®

11/03/2026
0 lb 2 oz

Mailed from 32043 278347439264930

PRIORITY MAIL EXPRESS®

Created 2026-11-03

JON F RUBEL
1257 PLEASANT POINT RD
GREEN COVE SPRINGS FL 32043-8721

RDC 07
C012

WAIVER OF SIGNATURE

UNITED STATES BANKRUPTCY COURT
THE HONORABLE LAURIE S SILVERSTEIN
824 N MARKET ST FL 6
WILMINGTON DE 19801-3024

USPS TRACKING #

9470 1301 0935 5019 9052 69