

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ELETSON HOLDINGS INC.,

Debtor.¹

Chapter 11

Case No.: 23-10322 (JPM)

**DECLARATION OF LOUIS M. SOLOMON IN SUPPORT OF THE MOTION OF REED
SMITH LLP TO WITHDRAW ITS LIMITED REPRESENTATION OF PROVISIONAL
HOLDINGS**

Louis M. Solomon declares as follows under 28 U.S.C. § 1746:

1. I am a partner at the law firm Reed Smith LLP (“Reed Smith”), which has served as limited counsel to Provisional Holdings in the above captioned cases (the “Chapter 11 Cases”).

2. I submit this declaration in support of the Motion of Reed Smith LLP to Withdraw its Limited Representation of Provisional Holdings (the “Motion”).

3. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. I am fully familiar with the facts and circumstances set forth below, and all the evidence set out in this Declaration is based on my personal knowledge.

4. Reed Smith submits this motion as a precaution and to prevent further litigation over the scope of Reed Smith’s representation. Reed Smith intends to continue to represent Provisional Holdings in the limited scope set forth in its letters, dated, February 4, 2025 [Dkt. No. 1407] and February 21, 2025 [Dkt. No. 1465] and/or as or as requested by the client in a

¹ Prior to November 19, 2024, the Debtors in these cases were: Eletson Holdings Inc., Eletson Finance (US) LLC, and Agathonissos Finance LLC. On March 5, 2025, the Court entered a final decree and order closing the chapter 11 cases of Eletson Finance (US) LLC and Agathonissos Finance LLC.



manner consistent with Reed Smith's professional obligations and/or consistent with any orders of this Court, the District Court, or any other Court with jurisdiction over Reed Smith.

5. Reed Smith has provided notice of their intent to request withdrawal of its limited representation of Provisional Holdings in these Chapter 11 Cases. In connection with that notice, Reed Smith provided Provisional Holdings with a list of upcoming hearings and response dates.

6. I understand that Provisional Holdings knowingly and freely assents to the termination of their limited representation by Reed Smith in this Court.

Dated: March 18, 2025
New York, New York



Louis M. Solomon