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*Counsel for Appellants*

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

In re:

ELETSON HOLDINGS INC., *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10322 (JPM)

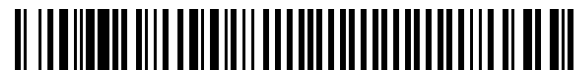
(Jointly Administered)

**APPELLANTS' AMENDED STATEMENT OF ISSUES TO BE PRESENTED  
AND DESIGNATION OF ITEMS TO BE INCLUDED  
IN THE RECORD ON APPEAL OF THE  
MARCH 6, 2025 AMENDED FOREIGN REPRESENTATIVE ORDER**

In accordance with Federal Rule of Bankruptcy Procedure 8009, Lassia Investment Company, Glafkos Trust Company, and Family Unit Trust Company, (together, the “Appellants”), by and through their undersigned counsel, respectfully submit (1) the following statement of issues to be tried on appeal, (2) the designation of the items to be included in the record on appeal and (3) the certification regarding transcripts in connection with the Appellants’ *Notice of Appeal* (Dkt.

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<sup>1</sup> The Debtors in these chapter 11 cases are: Eletson Holdings Inc., Eletson Finance (US) LLC, and Agathonissos Finance LLC. The address of the Debtors’ corporate headquarters is 118 Kolokotroni Street, GR 185 35 Piraeus, Greece. The Debtors’ mailing address is c/o Eletson Maritime, Inc., 1 Landmark Square, Suite 424, Stamford, Connecticut 06901.



No. 1551). As set forth in the Notice of Appeal, Appellants appeal from the United States Bankruptcy Court for the Southern District of New York's Amended Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief (Docket No. 1519) (the "Amended Foreign Representative Order").

**I. Statement of the Issues on Appeal**

1. Whether it was error for the Bankruptcy Court to enter the March 5, 2025 Amended Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief (Docket No. 1512) and the subsequent Amended Foreign Representative Order, amending the March 5, 2025 Order.

2. Whether the Bankruptcy Court exceeded its authority pursuant to 11 U.S.C. § 105, 11 U.S.C. § 1505, or any other applicable law, in issuing the Amended Foreign Representative Order in amending the previously entered December 12, 2024 Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief [Docket No. 1326] (the "Initial Foreign Representative Order") by purporting to authorize Adam Spears to act as a foreign representative of Reorganized Eletson Holdings Inc. in matters other than proceedings to recognize and enforce the Confirmation Order [Docket No. 1223].

3. Whether the Bankruptcy Court exceeded its jurisdiction in issuing the Amended Foreign Representative Order in amending the previously entered Initial Foreign Representative Order by purporting to authorize Adam Spears to act as a foreign representative of Reorganized Eletson Holdings Inc. in matters other than proceedings to recognize and enforce the Confirmation Order.

4. Whether the Bankruptcy Court erred in disregarding principles of international comity in entering the Amended Foreign Representative Order and purporting to authorize Adam

Spears to act as a foreign representative of Reorganized Eletson Holdings Inc. in matters other than proceedings to recognize and enforce the Confirmation Order.

5. Whether it was error for the Court to enter the Amended Foreign Representative Order without a motion on notice to amend the Initial Foreign Representative Order and/or to seek the new relief granted in the Amended Foreign Representative Order.

## **II. Designation of the Record on Appeal**

Appellants respectfully designate the following items to be included in the appellate record under Bankruptcy Rule 8009(a). Each designated item includes all exhibits and/or attachments to such item. The list of designated items includes materials filed on the Bankruptcy Court's docket and exhibits admitted into evidence during the hearing on the objection lodged as to the prior January 29, 2025 order, which formed the basis of the Sanctions Order, as set forth in the following tables (collectively, the "February Sanctions Exhibits").

### **A. Bankruptcy Court Docket Entries (Case No. 23-10322)**

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
846	7/8/2024	Amended Plan /Notice of Filing of Solicitation Version of Petitioning Creditors' Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
847	7/8/2024	Amended Disclosure Statement /Notice of Filing of Solicitation Version of Disclosure Statement In Support of Petitioning Creditors' Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors
851	7/9/2024	Notice of Proposed Order /Notice of Filing of Solicitation Version of Proposed Order (I) Approving (A) The Rights Offering and Related Procedures and Materials and (B) The Backstop Agreement, and (II) Granting Related Relief
913	8/2/2024	Statement /Notice of Filing of Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1132	9/19/2024	Amended Plan /Notice of Filing of Petitioning Creditors' Revised Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors
1134	9/19/2024	Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
1212	10/25/2024	Memorandum Opinion and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors, Sustaining Objections to Competing Plans, and Denying Motion in Limine
1223	11/4/2024	Findings of Fact, Conclusions of Law, and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Eletson Holdings Inc. and its Affiliated Debtors
1242	11/13/2024	Letter /Letter to the Honorable John P. Mastando III re: Status Conference on November 13, 2024
1254	11/14/2024	Transcript of November 13, 2024 Conference
1255	11/19/2024	Statement /Notice of Filing of Third Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors
1258	11/19/2024	Statement /Notice of (I) The Occurrence of the Effective Date and (II) Final Deadlines for Filing Certain Claims
1269	11/25/2024	Motion to Authorize/Reorganized Holding's Motion For an Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
1281	12/3/2024	Affidavit of Service of Ronaldo Lizarraga Angulo re: Documents Served on November 25, 2024
1285	12/10/2024	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions on Elteson Holdings" (a) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1287	12/10/2024	Opposition / Reed Smith LLP's Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1288	12/10/2024	Declaration of Louis M. Solomon in Support of Reed Smith's Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions
1289	12/10/2024	Declaration of Betty Lamin-Blamo Pursuant to 28 U.S.C. 1746
1290	12/10/2024	Declaration of Vasilis Hadjieleftheriadis in Support of Reed Smith's Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions
1292	12/10/2024	Response to Motion Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings
1293	12/10/2024	Statement/Provisional Holdings' Joinder to Majority Shareholders' Response to Reorganized holdings' Motion For an Order (i) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Reated Relief
1299	12/13/2024	Response /Reorganized Holdings' Omnibus Reply to the Objections to Its Sanctions Motion and Foreign Representative Motion
1300	12/13/2024	Declaration /Declaration of Jared C. Borriello In Support of Reorganized Holdings' Omnibus Reply to the Objections to its Sanctions Motion and Foreign Representative Motion
1301	12/13/2024	Statement / Statement of the Official Committee of Unsecured Creditors in Support of the Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1313	12/17/2024	Letter to the Honorable Judge John P. Mastando III Regarding Liberian Threats
1317	12/18/2024	Letter to the Honorable Judge John P. Mastando III Regarding Togut Letters
1326	12/20/2024	Order signed on 12/20/2024 Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
1328	12/23/2024	Letter to the Honorable John P. Mastando III re: Follow-up to December 16, 2024 Status Conference, Appeal Status

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1330	12/27/2024	Notice of Proposed Order /Notice of Filing of Revised Proposed Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1333	12/30/2024	Memorandum Endorsed Order signed on 12/30/2024 Re: Letter The Daniolos Law Firm.
1338	12/31/2024	Opposition / Reed Smith LLP's Limited Opposition to Revised Proposed Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1339	1/2/2025	Letter /Letter to Honorable John P. Mastando III Re: January 6, 2025 Hearing and Response to Reed Smith's Opposition to the Revised Proposed Order concerning the Sanctions Motion
1343	1/5/2025	Statement /Joint Exhibit List for January 6, 2025 Hearing
1344	12/17/2024	Transcript Regarding Hearing Held on 12/16/2024
1350	1/9/2025	Objection/Reorganized Holdings' (A) Preliminary Objection To Reed Smith's Fourth Interim And Final Fee Application And (B) Request For Disgorgement Of All Reed Smith's Fees
1351	1/9/2025	Declaration/Declaration of Jared C. Borriello, Esq. in Support of Reorganized Holdings' (A) Preliminary Objection To Reed Smith's Fourth Interim And Final Fee Application And (B) Request For Disgorgement Of All Reed Smith's Fees
1353	1/10/2025	Letter /Letter to the Honorable John P. Mastando III re: Motion [Dkt. No. 1268] - post trial briefing issues
1354	1/13/2025	Letter to the Honorable John P. Mastando Regarding Developments in Liberia and in the United States
1355	1/13/2025	Statement /Eletson Holdings Inc's Proposed Findings of Fact and Conclusions of Law Approving Pending Motion for Contempt and Other Relief Against, Inter Alia, Reed Smith, Eletson Holding's Address of Record and Former Shareholders, Officers and Directors
1356	1/13/2025	Findings of Fact and Conclusions of Law in Support of Opposition to Emergency Motion of "Reorganized Eletson Holdings Inc." for an Order Imposing Sanctions Against Reed Smith LLP

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1359	1/14/2025	Motion for Contempt /Reorganized Eletson Holdings Inc.'s Motion for Entry of an Order to Show Cause
1360	1/15/2025	Letter to Honorable John P. Mastando III Re: Response to Reed Smith's Letter Dated January 13, 2025
1367	1/16/2025	Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1369	1/16/2025	Declaration of Isaac Nesser In Support of Levona's Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1370	1/17/2025	Affidavit of Service
1371	1/17/2025	Memorandum of Law /Reorganized Holdings' Post-Trial Brief Concerning the Sanctions Motion
1372	1/17/2025	Reed Smith LLP's Post-Hearing Brief in Opposition to Emergency Motion of "Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions"
1382	1/9/2025	Amended Transcript of Hearing on January 6, 2025
1387	1/27/2025	Statement/Joinder and Reservation of Rights of Eletson Holdings Inc. to Levona Holdings Ltd.'s Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1402	1/29/2025	Order signed on 1/29/2025 In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization.
1405	1/28/2025	Amended Transcript Regarding Hearing Held on 1/24/2025
1406	2/4/2025	Affidavit of Service of Order in Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization
1407	2/4/2025	Letter to the Honorable John P. Mastando Regarding Compliance with Order on 1/29/2025
1408	2/4/2025	Affidavit of Service re: Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1416	2/6/2025	Emergency Motion to Compel, Motion for Sanctions /Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1431	2/13/2025	Supplemental Memorandum of Law in Support of Levona's Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP
1434	2/14/2025	Opposition of Reed Smith LLP to Levona Holdings Ltd.'s Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1435	2/14/2025	Declaration of Louis M. Solomon in Support of Reed Smith LLP Opposition to Levona Holdings Ltd.'s Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1441	2/17/2025	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1444	2/17/2025	Objection to Motion Objection of the Majority Shareholders of Eletson Holdings Inc. to Emergency Motion for Entry of a Further Order in Support of Confirmation
1445	2/17/2025	Opposition Of Non-Party Rimn P.C. To The Emergency Motion of Eletson Holdings Inc. For Entry of A Further Order In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization
1455	2/19/2025	Response /Eletson Holdings Inc.'s Omnibus Reply to Objections to Emergency Motion of Eletson Holdings Inc for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1464	2/19/2025	Motion Response on Behalf of Sidley Austin LLP to Eletson Holdings Inc.'s Omnibus Reply



<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1468	2/21/2025	Statement /Notice of Filing of Transcript Related to the Court's February 20, 2025 Decision Regarding Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization [Docket No. 1416]
1469	2/21/2025	Letter to the Honorable John P. Mastando in Connection with the Court's Oral Ruling at the February 20, 2025 Hearing
1472	2/24/2025	Statement Lassia Investment Company Certification to the Court
1473	2/24/2025	Statement Family Unity Trust Company Certification to the Court
1474	2/24/2025	Statement Glafkos Trust Corporation Certification to the Court
1476	2/24/2025	Reply to Motion/Reply in Support of Levona's Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP
1478	2/24/2025	Declaration/Declaration of Isaac Nesser In Support of Levona's Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP
1482	2/24/2025	Letter / Email dated 2/24/2025 Filed by John Markianos-Daniolos on behalf of Vasilis Kertsikoff, Vasilis Hadjieleftheriadis, Laskarina Karastamati
1483	2/25/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1485	2/25/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1486	2/26/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1492	2/27/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1494	2/27/2025	Letter /Letter to the Honorable John P. Mastando III, Re: Response to Reed Smith Letter
1495	2/27/2025	Order Signed on 2/27/2025 In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization And Imposing Sanctions On Certain Parties.

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1505	2/21/2025	Transcript Regarding Hearing Held on 2/20/2025 at 9:30 AM RE: Notice of Hearing of Motion to Stay Enforcement of January 29, 2025 Order Pending Appeal...etc...
1510	3/4/2025	Letter to Hon. John P. Mastando From Isaac Nesser Attaching Demonstrative Exhibit From March 3, 2025 Hearing
1512	3/5/2025	Amended Order Signed on 3/5/2025 Authorizing Adam Spears to Act as Foreign Representative of Reorganized holdings and (II) Granting Related Relief
1517	3/5/2025	Letter to the Honorable John P. Mastando in Response to the Letter Regarding the Demonstrative Exhibit From the March 3, 2025 Hearing
1518	3/6/2025	Letter Supplementing Responses to Questions at the March 3, 2025 Hearing
1519	3/6/2025	Amended Order Signed on 3/5/2025 (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized holdings and (II) Granting Related Relief
1521	3/4/2025	Transcript Regarding Hearing Held on 3/3/2025 at 9:33 AM RE: Motion to Authorize/Enforce the Stipulated Stay Relief Order and For Sanctions Against (A) The Purported Preferred Nominees and (B) Reed Smith LLP Pursuant to Section 105(a) of the Bankruptcy Code and Inherent Authority
1551	3/19/2025	Notice of Appeal

**B. Admitted Exhibits from the January 6, 2025 Hearing [Dkt. 1343]**

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-1	Stipulation and Agreement to Dismiss Appeal Under Rule 8023 of the Federal Rules of Bankruptcy Procedure
TX-2	November 12, 2024 SDNY Hearing Transcript
TX-3	November 20, 2024 Letter from L. Solomon to Judge Liman
TX-4	November 12, 2024 Letter from L. Solomon to Judge Mastando
TX-5	Reorganized Eleton Holdings Togut Retention Letter
TX-6	October 28, 2024 Email from L. Ebrahimi to D. Baker at 9:04 a.m.
TX-7	October 30, 2024 Email from B. Kotliar to D. Baker at 10:20 a.m.
TX-8	November 5, 2024 Email from B. Kotliar to D. Baker at 5:34 p.m.

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-9	October 28, 2024 Email from D. Baker to B. Kotliar at 5:39 p.m.
TX-10	November 8, 2024 Email from D. Baker to B. Kotliar at 4:38 p.m.
TX-11	November 11, 2024 Email from D. Baker to B. Kotliar at 1:57 p.m.
TX-12	November 12, 2024 Email from D. Baker to B. Kotliar at 5:51 p.m.
TX-13	November 13, 2024 Hearing Transcript
TX-14	November 12, 2024 Email from B. Kotliar to D. Baker at 7:25 a.m.
TX-15	November 17, 2024 Email from L. Solomon to B. Kotliar at 4:23 p.m.
TX-16	Restriction Letter
TX-17	November 21, 2024 Letter from L. Solomon to Judge Liman
TX-18	November 21, 2024 Termination Letter
TX-19	TradeWinds Article
TX-20	May 15, 2024 Hearing Transcript
TX-21	Declaration of James Pierre Pursuant to 28 U.S.C. § 1746
TX-22	Rebuttal Declaration of James Pierre Pursuant to 28 U.S.C. § 1746
TX-23	September 11, 2024 Hearing Transcript
TX-24	Email from Derek J. Baker to Bryan M. Kotliar Regarding Eletson Holdings, Inc., Bankr. S.D.N.Y. 23-10322 - Payment of Fees to Reed Smith
TX-25	Eletson Corp, Action by Unanimous Written Consent of the Board of Directors
TX-26	Eletson Corp, Action by Written Consent of the Stockholders of Eletson Corp in Lieu of a Meeting
TX-27	Eletson Gas, Action by Written Consent of the Common Unit Holder of Eletson Gas
TX-28	Eletson Gas, Action by Unanimous Written Consent of the Board of Directors
TX-29	Eletson Gas, Action by Unanimous Written Consent of the Board of Directors
TX-30	Eletson Gas, Action by Written Consent of the Common Unit Holder of Eletson Gas
TX-31	Greek Petition (certified English translation)
TX-32	Ballot submitted by Elafonissos Shipping Corp., signed by Ionnis Zilakos.
TX-33	Ballot submitted by Keros Shipping Corp., signed by Emmanouil Andreolakis
TX-34	Ballot submitted by Glafkos Trust Company, signed by Vasileios Chatzieleftheridadis

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-35	Ballot submitted by Lassia Investment Company, signed by Lascarina Karastamati
TX-36	Ballot submitted by Family Unity Trust Company, signed by VK Kertsikoff
TX-37	Declaration of Vasilis Hadjieleftheriadis in Support of Second Amended Joint Plan of Reorganization of Debtors under Chapter 11 of the United States Code
TX-38	Deposition of Vasilis A. Hadjieleftheriadis, dated September 3, 2024
TX-39	December 5, 2024 Email from Bryan Kotliar to Vasilis Hadjieleftheriadis, including attachments of the Sanctions Motion [ECF 1268]; and Notice of Adjournment of Hearing [ECF 1277]
TX-40	December 23, 2024 SDNY Hearing Transcript
TX-41	December 27, 2024 Email from L. Solomon to Jennifer Furey re Eletson Holdings Inc.
TX-42	November 21, 2024 Letter from Peter J. Kennedy to Adam Spears re Eletson Boldin.gs Client Files
TX-43	December 3, 2024 Letter from L. Solomon to Jennifer Furey re Eletson Holdings Inc. and its Subsidiaries
TX-44	December 30, 2024 Letter from Jennifer Furey to Judge Liman re Eletson Client Files
TX-45	November 27, 2024 Email from M. Papanikolaki to M. Gonzalez re EMC Investment Corporation BI Confirmation
TX-46	December 10, 2024 Email from M. Papanikolaki to M. Gonzalez re Kastoss & Fourni With Novum, Wrong Acct. Payment of Dec. Hires (including attachments)
TX-47	December 12, 2024 Email from M. Papanikolaki to J. Lang and S. Burbridge re Kastoss & Fourni With Novum, Wrong Acct. Payment of Dec. Hires
TX-48	December 23, 2024 Email from P. Gilatis to V. Chopra re M / T KASTOS / NOVUM -TC/ P 12 JAN.23 -REF.NO.: 165TC - JAN 25HIRE (NEW BANK DETAILS-ABN) (including attachments)
TX-49	January 2, 2025 Email from Novum to Eletson re Kastoss/Fourni with Novum
TX-50	E-mail from B. Kotliar to William Curtin dated January 3, 2025
TX-51	January 2, 2025 Letter by Togut to Judge Mastando
TX-52	Closing Checklist
TX-53	Reed Smith October 28 Response Email
TX-54	Togut October 28 Response Email
TX-55	Reed Smith October 30 Email
TX-56	Togut October 30 Response Email
TX-57	Reed Smith October 30 Response Email

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-58	Togut November 4 Email
TX-59	Togut November 5 Email
TX-60	Reed Smith November 6 Email
TX-61	Reed Smith November 8 Email
TX-62	Togut November 11 Email
TX-63	Reed Smith November 11 Response Email
TX-64	Togut November 12 Email
TX-65	Reed Smith November 12 Response Email
TX-66	Togut November 12 Response Email
TX-67	Authorization Letter
TX-68	Togut November 13 Email
TX-69	Reed Smith November 14 Daniolos Email
TX-70	Reed Smith November 15 Email
TX-71	Togut November 15 Response Email
TX-72	Reed Smith November 17 Email
TX-73	Spears Letter
TX-74	Togut District Court Letter
TX-75	November 21 Adam Spears Letter
TX-76	Hockinson Email
TX-77	Togut November 26 Email
TX-78	Reed Smith November 27 Response Email
TX-79	Togut November 27 Response Email
TX-80	Daniolos Letter
TX-81	Excerpt of Greek Order with Counsel's Translation
TX-82	November 1 Email
TX-83	Eletson Holdings, Inc. Restated Articles of Incorporation
TX-84	Eletson Holdings, Inc.'s Amended By-Laws
TX-85	Compilation of Messages to Employees
TX-86	November 28 Email
TX-87	November 19 Berenberg Bank Letter
TX-88	November 24 Email
TX-89	Eletson Gas LLC Agreement
TX-90	Declaration of Betty Lamin-Blamo
TX-91	The Liberian Business Corporation Act
TX-92	Amended Disclosure Statement in Support of Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-93	Notice of Filing of Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-94	Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-95	Notice of Filing of Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-96	Memorandum Opinion and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors, Sustaining Objections to Competing Plans, and Denying Motions in Limine
TX-97	Findings of Fact, Conclusions of Law, and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Eletson Holdings Inc. and its Affiliated Debtor
TX-98	Notice of Filing of Third Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-99	Notice of (I) the Occurrence of the Effective Date and (II) Final Deadlines for Filing Certain Claims
TX-100	Togut Letter, dated December 18, 2024 regarding Liberian Court filings
TX-101	Eletson Holdings, Action by Written Consent of the Stockholders of Eletson Holdings in Lieu of a Meeting, dated November 19, 2024
TX-102	January 3, 2025 Letter by Reed Smith in response to Goulston & Storrs December 30, 2024 Letter Motion
TX-103	January 3, 2025 Order Denying Goulston Letter Motion
TX-104	Eletson Holdings Liberian Certificate of Incumbency
TX-105	E-mail from Adam Spears to Vasilis Hadjieleftheriadis, dated December 27, 2024
TX-106	E-mail from Adam Spears to Vasilis Hadjieleftheriadis, Vassilis Kertsikoff, and Lascarina Karastamati dated January 3, 2025
TX-107	Declaration of Vasilis Hadjieleftheriadis In Support of Debtor's Opposition to the Motion to Appoint a Trustee (Filed Under Seal)
TX-108	Objection of the Majority Shareholders of Eletson Holdings Inc. to Sanctions Motion
TX-109	Majority Shareholders' Response to Reorganized Holdings' Motion for an Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
TX-110	Provisional Holdings' Joinder to Majority Shareholders' Response to Reorganized Holdings' Motion for an Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief

<b>Trial Exhibit No.</b>	<b>Description</b>
TX-111	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Reorganized Holdings Inc. for an Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, including Reed Smith LLP
TX-112	Notice of filing Second Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-113	December 16, 2024 Hearing Transcript
TX-114	E-mail from Bryan Kotliar to William Curtin, dated December 17, 2024
TX-115	E-mail from Bryan Kotliar to William Curtin, dated December 18, 2024
TX-116	E-mail from Bryan Kotliar to William Curtin, dated December 19, 2024
TX-117	E-mail from Bryan Kotliar to William Curtin, dated December 20, 2024
TX-118	E-mail from Bryan Kotliar to William Curtin, dated December 21, 2024
TX-119	E-mail from Bryan Kotliar to William Curtin, dated December 22, 2024
TX-120	E-mail from Bryan Kotliar to William Curtin, dated December 26, 2024
TX-121	December 20, 2024 Hearing Transcript Bankruptcy Court
TX-122	November 13, 2024 Letter from Reed Smith
TX-123	Liberian General Construction Law
TX-124	Liberian BCA Amendment (2022)
TX-125	Eletson Holdings Articles of Amendment of Articles of Incorporation
TX-126	Liberian Recognition Proceeding
TX-127	Motion to Dismiss Liberian Recognition Proceeding
TX-128	Notice of Voluntary Discontinuance of Liberian Recognition Proceeding

### **III. Certification Regarding Transcripts**

Pursuant to Bankruptcy Rule 8009(b)(1), Appellants hereby certify that they are not ordering any transcripts. All transcripts have been prepared, are available on the docket, and are designated in the foregoing designation of the record.

**IV. Reservation of Rights**

Appellants reserve and do not waive any of their rights to supplement this statement of issues for appeal and the designation of the record for appeal contained herein. This filing is made expressly subject to, and without waiver of, any and all rights, remedies, challenges and objections.

Dated: April 2, 2025  
New York, New York

Respectfully submitted,

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