

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

ELETSON HOLDINGS INC.,

Debtor¹

Chapter 11

Case No.: 23-10322 (JPM)

**NOTICE OF MOTION OF APARGO LIMITED, FENTALON LIMITED, AND
DESIMUSCO TRADING LIMITED FOR RECONSIDERATION
OF THE MARCH 25, 2025 ORDER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Reconsideration of the March 25, 2025 Order, dated April 8, 2025, and the Declaration of Hal S. Shaftel in Support of the Motion for Reconsideration of the March 25, 2025 Order, dated April 8, 2025 and the exhibits annexed thereto, Apargo Limited, Fentalon Limited, and Desimusco Trading Limited (collectively, the “Preferred Shareholders”), by and through their undersigned attorneys, shall move this Court, before the Honorable John P. Mastando III, at the United States Bankruptcy Courthouse for the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York, 10007, at a date and time to be determined by the Court, for an Order, pursuant to Federal Rule of Bankruptcy Procedure Rules 9023 and 9024, granting reconsideration and amendment of the Court’s March 25, 2025 oral ruling (the “March 25 Order”), to the extent the Court previously found that the Greek arbitration confirmation proceeding,

¹ The Court has ordered the following footnote to be included in this caption: “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. Commencing on [March 5, 2025], all motions, notices, and other pleadings relating to any of the Debtors shall be filed in the chapter 11 case of Eletson Holdings Inc. The Debtor’s mailing address is c/o Togut, Segal & Segal LLP, One Penn Plaza, Suite 3335, New York, New York 10119.” Dkt. 1515 ¶ 7.



identified on Line 2 of Exhibit 1 of the Order in Further Support of Confirmation and Consummation of the Court Approved Plan of Reorganization (Dkt. 1537) (the “March 13 Order”), “violates the plan, the confirmation order, the January 29 order, and the March 13th order” (3/25/25 Tr. at 9:20-22) and to the extent it further found that “proceeding is properly included in the [Sanctions Order]” (*id.* at 9:22); and for such other and further relief as the Court deems just.

Dated: April 8, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Hal S. Shaftel

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