

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

In re:

Eletson Holdings Inc., et al.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-10322 (JPM)

(Jointly Administered)

**APPELLANT’S STATEMENT OF ISSUES TO BE PRESENTED AND DESIGNATION  
OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL OF PORTIONS OF THE  
MARCH 13, 2025 ORDER INCORPORATING THE MARCH 12, 2025 ORAL DECISION**

In accordance with Federal Rule of Bankruptcy Procedure 8009, the Daniolos Law Firm (“Appellant”) respectfully submits (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 Appellant’s *Notice of Appeal* (Dkt. No. 1562). As set forth in the Notice of Appeal, Appellant appeals from that part of the United States Bankruptcy Court for the Southern District of New York’s March 13, 2025 order (Dkt. No. 1537) and the March 12, 2025 oral decision (Dkt. No. 1536) incorporated therein that rejected Daniolos’s argument that (a) Daniolos has “not been served according to the Hague Convention”; and (b) that “exercising personal jurisdiction over them is inconsistent with due process” (see Dkt. No. 1536 at 60:24- 62:6).

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<sup>1</sup> 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).



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

1. Whether it was error for the Bankruptcy Court to determine that it was not necessary for Appellant to be served in accordance with the Hague Convention?

2. Whether it was error for the Bankruptcy Court to determine that the Court could exercise personal jurisdiction over Appellant?

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

Appellant respectfully designates the following items to be included in the appellate record under Bankruptcy Rule 8009(a). Each designated item includes all exhibits and/or attachments and/or items related to such item. The list of designated items includes materials set forth in the following tables.

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

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1562	3/26/2025	Notice of Appeal (related document(s) 1536, 1537) filed by Michael S Lazaroff on behalf of Daniolos Law Firm. (Attachments: # 1 Exhibit A - March 13, 2025 Order # 2 Exhibit B - March 12, 2025 Oral Decision # 3 Civil Cover Sheet # 4 Related Case Statement).
1537	3/13/2025	Order signed on 3/13/2025 In Further Support of Confirmation And Consummation Of The Court-Approved Plan of Reorganization (Related Doc # 1459).
1536	3/13/2025	Statement /Notice of Filing of Transcript Related to the Court's Ruling on March 12, 2025 Relating to the Emergency Motion of Eletson Holdings Inc. for Entry of an Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization (Attachment: Ex. A: March 12, 2025 Hearing Transcript) (related document(s) 1459) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.

Dkt. No.	Date Filed	Description
1535	3/12/2025	Affidavit of Service re: 1) Eletson Holdings Inc.'s Omnibus Reply in Support of its Foreign Opposition Sanctions Motion; and 2) Declaration of Jared C. Borriello, Esq. in Support of Eletson Holdings Inc.'s Omnibus Reply in Support of its Foreign Opposition Sanctions Motion (related document(s) 1523, 1522).
1534	3/12/2025	Affidavit of Service 1) Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization and Imposing Sanctions on Certain Parties; and 2) Notice of Filing of Revised Proposed Order with Respect 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 (related document(s) 1499, 1495).
1533	3/12/2025	Affidavit of Service re: Notice of Hearing of 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 (related document(s) 1481).
1532	3/12/2025	Affidavit of Service re: 1) 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; 2) Motion to Shorten Notice with Respect 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; and 3) Scheduling Order (related document(s) 1459, 1470, 1460).

Dkt. No.	Date Filed	Description
1531	3/12/2025	Affidavit of Service re: 1) 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 ; 2) Supplemental Declaration of Bryan M. Kotliar, Esq. in Support of 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 ; and 3) Notice of Agenda of Matters Scheduled for Hearing on February 20, 2025 at 9:30 a.m. (Prevailing Eastern Time) (related document(s) 1455, 1461, 1457) filed by Kurtzman Carson Consultants, LLC dba Verita Global.
1528	3/11/2025	Notice of Agenda /(Hearing Date: 3/12/2025 at 9:30 AM - Via Zoom) Notice of Agenda of Matters Scheduled for Hearing on March 12, 2025 at 9:30 AM (Prevailing Eastern Time) (related document(s) 1496, 1459, 1523, 1507, 1470, 1466, 1460, 1522, 1509, 1465, 1499, 1508, 1506, 1481) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc. with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.
1523	3/07/2025	Declaration /Declaration of Jared C. Borriello, Esq. In Support of Eletson Holdings Inc's Omnibus Reply In Support of Its Foreign Opposition Sanctions Motion (Attachments: Exs. 1-39) (related document(s) 1459, 1507, 1522, 1509, 1508, 1506) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc. with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.
1522	3/07/2025	Response /Eletson Holdings Inc.'s Omnibus Reply In Support of Its Foreign Opposition Sanctions Motion (Attachment: Appendix A) (related document(s) 1459, 1507, 1509, 1508, 1506) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc. with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.

Dkt. No.	Date Filed	Description
1507	3/04/2025	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 (related document(s) 1459) filed by Michael S Lazaroff on behalf of Daniolos Law Firm.
1505	2/21/2025	Transcript regarding Hearing Held on 2/20/2025 at 9:30 AM RE: Notice of Hearing of Motion for Stay of Enforcement of January 29, 2025 Order Pending Appeal.. etc... Remote electronic access to the transcript is restricted until 5/22/2025. The transcript may be viewed at the Bankruptcy Court Clerk's Office. (RE: related document(s) 1417, 1455, 1445, 1441, 1446, 1420, 1444, 1412, 1440, 1416). Notice of Intent to Request Redaction Deadline Due By 2/28/2025. Statement of Redaction Request Due By 3/14/2025. Redacted Transcript Submission Due By 3/24/2025. Transcript access will be restricted through 5/22/2025.
1504	3/04/2025	Affidavit of Service (related document(s) 1481) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1503	3/04/2025	Affidavit of Service (related document(s) 1468) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1502	3/04/2025	Affidavit of Service (related document(s) 1466) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1501	3/04/2025	Affidavit of Service (related document(s) 1459, 1455, 1460, 1461, 1457) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.

Dkt. No.	Date Filed	Description
1499	3/03/2025	Notice of Proposed Order /Notice of Filing of Revised Proposed Order with Respect 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 (Attachments: Ex. A: Revised Proposed Order with Ex. 1, Ex. B: Redline of Revised Proposed Order) (related document(s) <a href="#">1459</a> , <a href="#">1470</a> ) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc. with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.
1481	2/25/2025	Notice of Hearing /(Hearing Date: 3/12/2025 at 9:30 AM, Responses Due: 3/4/2025 at 5:00 PM, Replies Due: 3/7/2025 at 12:00 PM) Notice of Hearing of 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 (related document(s) <a href="#">1459</a> , <a href="#">1470</a> ) filed by Bryan Kotliar on behalf of Eletson Holdings Inc. with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.
1470	2/24/2025	Scheduling Order signed on 2/24/2025 Re: Sanctions Motion. (related document(s) <a href="#">1459</a> ) with hearing to be held on 3/12/2025 at 09:30 AM at Videoconference.
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 Filed by Louis M. Solomon on behalf of Reed Smith LLP.
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. <a href="#">1416</a> ] (Attachment: Ex. A: Transcript of February 20, 2025 Decision) (related document(s) <a href="#">1455</a> , <a href="#">1445</a> , <a href="#">1441</a> , <a href="#">1444</a> , <a href="#">1440</a> , <a href="#">1416</a> ) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc..
1464	2/19/2025	Response to Motion Response on Behalf of Sidley Austin LLP to Eletson Holdings Inc.'s Omnibus Reply (related document(s) <a href="#">1416</a> ) filed by William E Curtin on behalf of Sidley Austin LLP.

Dkt. No.	Date Filed	Description
1463	2/19/2025	Affidavit of Service re: Eletson Holdings Inc.'s Opposition to Motion for Stay of Enforcement of January 29, 2025 Order Pending Appeal; 2) Declaration of Adam Spears in Support of Eletson Holdings Inc.'s Opposition to Motion to Stay of Enforcement of January 29, 2025 Order Pending Appeal; and 3) Declaration of Jared C. Borriello, Esq. in Support of Eletson Holdings Inc.'s Opposition to Motion for Stay of Enforcement of January 29, 2025 Order Pending Appeal (related document(s) <a href="#">1443</a> , <a href="#">1446</a> , <a href="#">1447</a> ) filed by Kurtzman Carson Consultants, LLC dba Verita Global.
1461	2/19/2025	Notice of Agenda /Notice of Agenda of Matters Scheduled for Hearing on February 20, 2025 at 9:30 AM (Prevailing Eastern Time) Via Zoom for Government (related document(s) 1417, 1454, 1455, 1445, 1441, 1443, 1446, 1414, 1453, 1448, 1421, 1449, 1426, 1420, 1444, 1412, 1440, 1416, 1442, 1419, 1457, 1413, 1447) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.. with hearing to be held on 2/20/2025 at 09:30 AM at Videoconference.
1459	2/19/2025	Emergency 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 (Attachments: Ex. A: Proposed Order, Ex. B: Borriello Declaration with Exs. 1-22) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1458	2/19/2025	Affidavit of Service (related document(s) 1454, 1453, 1456) Filed by Louis M. Solomon on behalf of Provisional Eletson Holdings, Reed Smith LLP.

Dkt. No.	Date Filed	Description
1457	2/19/2025	Declaration /Supplemental Declaration of Bryan M. Kotliar, Esq. In Support of 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 (Attachments: Exhibits 1-24) (related document(s) 1455, 1445, 1441, 1444, 1440, 1416) filed by Bryan Kotliar on behalf of Eletson Holdings Inc. with hearing to be held on 2/20/2025 at 09:30 AM at Videoconference.
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 (related document(s) 1445, 1441, 1444, 1440, 1416) filed by Bryan Kotliar on behalf of Eletson Holdings Inc. with hearing to be held on 2/20/2025 at 09:30 AM at Videoconference.
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 (related document(s) 1416) filed by Michael S Lazaroff on behalf of Daniolos Law Firm.
1429	2/11/2025	Affidavit of Service re: Documents Served on February 7, 2025 (related document(s) 1417, 1421, 1420, 1416) filed by Kurtzman Carson Consultants, LLC dba Verita Global.
1428	2/11/2025	Affidavit of Service (related document(s) 1417, 1421, 1420, 1416) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1427	2/11/2025	Affidavit of Service (related document(s) 1417, 1416) Filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.



Dkt. No.	Date Filed	Description
1421	2/07/2025	Notice of Hearing /(Hearing Date: 2/20/2025 at 9:30 AM, Objections Due: 2/17/2025 at 12:00 PM, Via Zoom For Government) Notice of Hearing of 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 (related document(s) 1417, 1420, 1416) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.. with hearing to be held on 2/20/2025 at 09:30 AM at Videoconference. Objections due by 2/17/2025.
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 (Attachments: Ex. A: Proposed Order, Ex. B: Kotliar Declaration with Exs. 1-12, Ex. C. Service Table) (related document(s) 1355, 1212, 1223, 1258, 1406, 1371, 1291, 1356, 1372, 1301, 1268, 1287, 1033, 1402, 1132, 1299, 1285, 1029, 1408) filed by Kyle J. Ortiz on behalf of Eletson Holdings Inc.
1408	2/04/2025	Affidavit of Service re: Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization (related document(s) 1402) filed by Kurtzman Carson Consultants, LLC dba Verita Global.
1405	1/28/2025	(Amends Document # 1396)Transcript regarding Hearing Held on 1/24/2025 at 9:02 AM RE: Case Status Conference. Remote electronic access to the transcript is restricted until 4/28/2025. The transcript may be viewed at the Bankruptcy Court Clerk’s Office. Notice of Intent to Request Redaction Deadline Due By 2/4/2025. Statement of Redaction Request Due By 2/18/2025. Redacted Transcript Submission Due By 2/28/2025. Transcript access will be restricted through 4/28/2025. (Ortiz, Carmen)Modified on 1/31/2025.
1402	1/29/2025	Order signed on 1/29/2025 In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization. (related document(s) 1268).

Dkt. No.	Date Filed	Description
1382	1/9/2025	<p>Transcript regarding Hearing Held on 1/6/2025 at 9:37 AM RE: (Amends Doc # 1357) Statement/Joint Exhibit..etc... Remote electronic access to the transcript is restricted until 4/9/2025. The transcript may be viewed at the Bankruptcy Court Clerk’s Office. (RE: related document(s) 1333, 1319, 1288, 1330, 1332, 1295, 1298, 1296, 1291, 1314, 1317, 1290, 1277, 1313, 1301, 1316, 1289, 1300, 1268, 1287, 1274, 1299, 1285, 1331, 1339, 1329, 1267, 1338). Notice of Intent to Request Redaction Deadline Due By 1/16/2025. Statement of Redaction Request Due By 1/30/2025. Redacted Transcript Submission Due By 2/10/2025. Transcript access will be restricted through 4/9/2025. (Ortiz, Carmen) (Entered: 01/23/2025)</p>
1345	12/23/2024	<p>Transcript regarding Hearing Held on 12/20/2024 at 11:02 AM RE: Status Conference; Notice of Hearing/Notice of Status Conference. Remote electronic access to the transcript is restricted until 3/24/2025. The transcript may be viewed at the Bankruptcy Court Clerk’s Office. (RE: related document(s) 1317, 1316). Notice of Intent to Request Redaction Deadline Due By 12/30/2024. Statement of Redaction Request Due By 1/13/2025. Redacted Transcript Submission Due By 1/23/2025. Transcript access will be restricted through 3/24/2025.</p>
1344	12/17/2024	<p>Transcript regarding Hearing Held on 12/16/2024 at 10:03AM RE: Notice of Adjournment of Hearing; Motion for Sanctions /Emergency Motion of Reorganized Eletson Holdings Inc...etc... Remote electronic access to the transcript is restricted until 3/17/2025. The transcript may be viewed at the Bankruptcy Court Clerk’s Office. (RE: related document(s) 1269, 1275, 1288, 1223, 1295, 1298, 1296, 1291, 1290, 1277, 1301, 1289, 1300, 1268, 1292, 1287, 1132, 1274, 1299, 1285, 1267, 1293). Notice of Intent to Request Redaction Deadline Due By 12/26/2024. Statement of Redaction Request Due By 1/7/2025. Redacted Transcript Submission Due By 1/17/2025. Transcript access will be restricted through 3/17/2025.</p>

Dkt. No.	Date Filed	Description
1333	12/30/2024	Memorandum Endorsed Order signed on 12/30/2024 Re: Letter The Daniolos Law Firm. (related document(s) 1332, 1285).
1332	12/30/2024	Letter Seeking Clarification (related document(s) 1285) Filed by Michael S Lazaroff on behalf of Daniolos Law Firm.
1303	12/13/2024	Amended Notice of Agenda /Hearing Date: 12/16/2024 at 10:00 AM EST) Amended Notice of Agenda of Matters Scheduled for Hearing on December 16, 2024 at 10:00 AM (EST) (related document(s) 1269, 1275, 1288, 1295, 1298, 1296, 1291, 1290, 1277, 1301, 1289, 1300, 1268, 1292, 1287, 1274, 1299, 1285, 1267, 1293) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.. with hearing to be held on 12/16/2024 at 10:00 AM at Videoconference.
1302	12/13/2024	Notice of Agenda /(Hearing Date: 12/16/2024 at 10:00 AM Via Zoom) Notice of Agenda of Matters Scheduled for Hearing on December 16, 2024 at 10:00 AM (EST) (related document(s) 1269, 1275, 1288, 1295, 1298, 1296, 1291, 1290, 1277, 1289, 1300, 1268, 1292, 1287, 1274, 1299, 1285, 1267, 1293) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.. with hearing to be held on 12/16/2024 at 10:00 AM at Videoconference.
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 (related document(s) 1268) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.

Dkt. No.	Date Filed	Description
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 (Attachments: Exhibits. 1-11) (related document(s) 1269, 1268, 1299) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.. with hearing to be held on 12/16/2024 at 10:00 AM at Videoconference.
1299	12/13/2024	Response /Reorganized Holdings' Omnibus Reply to the Objections to Its Sanctions Motion and Foreign Representative Motion (Attachment: Ex. A: Rebuttal Pierre Declaration) (related document(s) 1269, 1268, 1292, 1287, 1293) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.. with hearing to be held on 12/16/2024 at 10:00 AM at Videoconference.
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 Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP (related document(s) 1268) filed by Anthony Charles Acampora on behalf of Daniolos Law Firm. (Attachments: # 1 Declaration in Support).
1283	12/05/2024	Affidavit of Service /Supplemental Affidavit of Service (related document(s) 1277, 1268) Filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.
1281	12/3/2024	Affidavit of Service of Ronaldo Lizarraga Angulo re: Documents Served on November 25, 2024 (related document(s) 1269, 1275, 1268, 1274, 1267) filed by Kurtzman Carson Consultants, LLC dba Verita Global.
1280	12/03/2024	Affidavit of Service (related document(s) 1276, 1277) Filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.

Dkt. No.	Date Filed	Description
1277	11/26/2024	Notice of Adjournment of Hearing / [Corrects and Replaces Docket No. 1276] / (Adjourned Hearing Date: 12/16/2024 at 10:00 AM, Objections Due: 12/10/2024 at 2:00 PM, Replies Due: 12/13/2024 at 12:00 PM) Notice of Adjournment of Hearing on All Matters Scheduled to be Heard on December 9, 2024 at 10:00 AM (related document(s) 1269, 1268) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.. with hearing to be held on 12/16/2024 at 10:00 AM at Videoconference. Objections due by 12/10/2024.
1268	11/25/2024	Motion for Sanctions / 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 (Attachments: Ex. A: Proposed Order, Ex. B: Pierre Declaration, Ex. C: Kotliar Declaration with Exs. 1-19) (related document(s) 1267) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.
1267	11/25/2024	Motion to Shorten Time / Reorganized Eletson Holdings Inc.'s Motion to Shorten Notice and Hearing with Respect to 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 (Attachment: Ex. A: Proposed Order) filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc..

**III. Certification Regarding Transcripts**

Pursuant to Bankruptcy Rule 8009(b)(1), Appellant hereby certifies that it is 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**

Appellant reserves and does not waive any of its 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 9, 2025  
New York, New York

Respectfully submitted,

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