

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

ELETSON HOLDINGS INC., et al.,

Debtor.<sup>1</sup>

## Chapter 11

Case No. 23-10322 (JPM)

**DECLARATION OF KUNKUNYON WLEH TEH  
IN SUPPORT OF ELETSON HOLDINGS INC.'S MOTION FOR  
ENTRY OF AN ORDER AWARDING ATTORNEYS' FEES AND COSTS**

I, Kunkunyon Wleh Teh, a Liberian citizen and Counsellor-at-Law at International Law Group, LLC, who is admitted to practice law in the Republic of Liberia, hereby declare pursuant to section 1746 of title 28 of the United States Code, as follows:

1. I hold a law degree from Louis Arthur Grimes School of Law, University of Liberia (LL.B.) and a Master of Law (LL.M.) degree from Emory University School of Law. I am a partner at International Law Group, LLC (the “ILG Firm”), a general practice Liberian law firm. The areas of law I practice include corporate law, mining law, and civil and criminal litigation.

2. I submit this declaration (this “Declaration”) in support of *Eletson Holdings Inc.’s Motion for Entry of an Order Awarding Attorneys’ Fees and Costs* (the “Motion”), filed contemporaneously herewith.<sup>2</sup>

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. 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

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.



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3. I am authorized to submit this Declaration, and if called upon to testify, could and would testify competently to the facts and opinions set forth herein. Unless otherwise stated in this Declaration, I have personal knowledge of the facts and views set forth herein.

**Liberian Proceedings**

4. Eletson Holdings Inc. ("Holdings") retained the ILG Firm to represent Holdings in various legal proceedings before the courts of Liberia.

5. I represented Holdings in enforcement proceedings filed by Pach Shemen, LLC, through its Manager, Mark Lichtenstein. I also represent Holdings in other ancillary proceedings including matters before the Honorable Supreme Court of the Republic of Liberia to which LISCR is named as a party.

**ILG Firm Fees and Costs**

6. All of the fees and costs associated with the services described herein have been incurred due to the actions taken by the Sanctioned Parties against the recognition and implementation of Holdings' reorganization.

7. Should the Court grant the relief requested in the Motion, I am prepared to submit a supplemental declaration on behalf of the ILG Firm detailing the firm's time entries, staffing, and applicable billing rates in connection with its work on the Liberian proceedings, together with copies of the corresponding invoices.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: April 16, 2025  
Monrovia, Liberia

/s/ Kunkunyon Wleh Teh  
Kunkunyon Wleh Teh