

**ReedSmith**

Driving progress  
through partnership

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April 17, 2025

**Via ECF**

Honorable John P. Mastando  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

**Re: *In re Eletson Holdings, Inc., et al.*, Bankr. S.D.N.Y. 1:23-bk-10322 (JPM)**

Dear Judge Mastando:

We write on behalf of Reed Smith LLP ("Reed Smith") and, without prejudice to Reed Smith's pending motion to withdraw, Provisional Eletson Holdings Inc. ("Provisional Holdings"). We write regarding the four motions filed yesterday by Reorganized Eletson Holdings Inc. ("Reorganized Holdings") and to request respectfully a two-week extension of the April 23, 2025 response deadline to May 7, 2025, and an adjournment of the April 30, 2025 hearing date to May 14, 2025.

There is good cause for the requested adjournment given the other pressing deadlines that applicants have in the Second Circuit on these matters, the upcoming holidays (including Good Friday, Easter (including Greek Easter), and Passover), and the motions themselves. Reorganized Holdings filed four motions seeking fees, sanctions, and contempt, each supported by declarations and voluminous exhibits. As to the motion filed against Reed Smith, the accusations set forth are serious, including disqualification across numerous proceedings. Reed Smith will need adequate time to prepare on its own behalf, which, as we have advised Your Honor before, always takes more time because Murchinson has succeeded in forcing Reed Smith to consult other counsel in connection with its endless sanctions motions. Reorganized Holdings has also brought two motions against Provisional Holdings yet argues that Reed Smith is acting improperly by representing Provisional Holdings. This presents logistical challenges that may necessitate even more adjournments since Provisional Holdings is entitled to counsel. Even putting aside Reed Smith's pending motion to withdraw, if Reed Smith cannot represent Provisional Holdings on these motions, then that entity will need to find other counsel. If Reed Smith remains counsel to Provisional Holdings, then Reed Smith must respond to three motions at once. Just these three motions include 58 pages of briefing and six declarations, and just the Reed Smith motion includes 42 exhibits spanning 400 pages of documents. Respectfully, an extension of two weeks is necessary.

Respectfully submitted,



Louis M. Solomon

cc. Counsel of Record

The request is granted, in part. The Motions filed at ECF Docket Nos. 1597, 1602, 1605, 1607 and 1609 are hereby adjourned to May 15, 2025 at 9:00 a.m. (EST) with responses due by May 6, 2025 at 4:00 p.m. (EST) and replies due by May 12, 2025 at 4:00 p.m. (EST).

**It is SO ORDERED.**

Dated: New York, New York  
April 17, 2025

/s/ John P. Mastando III  
  
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