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through partnership

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April 30, 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 pursuant to the Court’s direction that we file a letter requesting an extension of the time to respond to the motions filed on April 16, 2025 by Reorganized Eletson Holdings Inc. (“Reorganized Holdings”) regarding our request to extend the current response deadline of May 6, 2025 and the hearing date of May 15, 2025 by two weeks. As previewed for your Honor during this morning’s hearing, we make this request in light of the additional filings made by Reorganized Holdings on the motions last night, April 29, 2025.

There is good cause for the requested adjournment. In addition to the 58 pages of briefing, six declarations, and over 400 pages of documents on the motion against Reed Smith alone, Reorganized Holdings now makes seeks to inject additional factual assertions (new claims, new countries) that the parties must investigate and respond to. While these supplements purportedly are only related to two of the motions, Reorganized Holdings has never been shy about lumping all of the parties together when making allegations or asking for relief.

Respectfully, an extension of two weeks is necessary.

Respectfully submitted,

Louis M. Solomon

cc. Counsel of Record

