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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
ELETSON HOLDINGS INC.,	:	Case No.: 23-10322 (JPM)
	:	
	:	
Debtor. ¹	:	
	:	
-----X		

**ELETSON HOLDINGS INC.'S REPLY IN SUPPORT OF
ITS SUPPLEMENT TO ITS MOTION TO AMEND COURT'S FOREIGN OPPOSITION
SANCTIONS ORDER [DOCKET NO. 1537] TO (A) INCREASE THE SANCTIONS
AMOUNT AND (B) IMPOSE SANCTIONS ON LASKARINA KARASTAMATI**

Eletson Holdings Inc. ("Holdings"), by and through its undersigned counsel, hereby submits this reply (this "Reply") to the objection filed by purported "Provisional Holdings" [Docket No. 1649] (the "Objection") to the *Supplement to Eletson Holdings Inc.'s Motion to Amend the Court's Foreign Opposition Sanctions Order* [Docket No. 1537] to (A) *Increase the Sanctions Amount* and (B) *Impose Sanctions on Laskarina*

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.



Karastamati, filed on April 29, 2025 [Docket No. 1629] (the “Supplement”),² and respectfully states:

REPLY TO OBJECTION

1. On May 12, 2025, Holdings filed its omnibus reply [Docket No. 1651] (the “Omnibus Reply”) in further support of its four pending motions (the “April 16 Motions”) and in response to objections filed thereto by Reed Smith and the other Law Firms, Provisional Holdings, and the Former Shareholders, including objections to the Motion to Amend filed by Provisional Holdings and the Former Shareholders.

2. Also on May 12, 2025, Provisional Holdings filed the Objection, reiterating the same arguments that Holdings has already responded to in the Omnibus Reply. *See* Omnibus Reply ¶¶ 17-30. For the Court’s convenience, those arguments are not restated herein. Particularly noteworthy, however, is the focus of the Objection on the rights of EMC Gas, a subsidiary of Eletson Gas. *See* Obj. ¶¶ 32, 36-41. Neither Eletson Gas nor EMC Gas have objected to any of the April 16 Motions. Instead, it is “Provisional Holdings,” through the mouthpiece of Reed Smith (which asserts that it also represents Eletson Gas but has not attempted to appear on its behalf in this case, including to oppose any of the April 16 Motions), that objects to the Supplement.

3. As noted in the Omnibus Reply, it is ironic that Provisional Holdings makes these arguments against Holdings, when such arguments would apply equally against Provisional Holdings—putting into light the clear conflict of interest of Reed Smith and the Former Principals on whose behalf they continue obstructing

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Supplement or the Omnibus Reply (as defined below).

implementation of the Plan. As this Court already noted, “it is not clear that Reed Smith has standing to raise any issue related to Eletson Gas, which it does not purport to represent here, and it is not clear whether Eletson Gas would agree with any of the positions set forth by Reed Smith.” See Docket No. 1603 (Ortiz Decl.), Ex. 14 (Mar. 25, 2025 Hr’g Tr.) at 9:23-10:2.

RESERVATION OF RIGHTS

4. Nothing in this Reply shall be deemed to be an admission or concession with respect to any aspect of the Objection not addressed herein. Holdings reserves its right to respond to any other aspect of the Objection during the hearing scheduled for May 15, 2025 at 9:00 a.m. (ET).

CONCLUSION

For the foregoing reasons, the Court should overrule the Objection and grant the Motion to Amend.

DATED: May 14, 2025
New York, New York

TOGUT, SEGAL & SEGAL LLP
By:

/s/ Kyle J. Ortiz

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