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May 23, 2025

**VIA ECF**

Honorable John P. Mastando, U.S.B.J.  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004

Re: *In re Eletson Holdings, Inc. et al.*, Case No. 23-10322 (JPM)

Dear Judge Mastando:

On behalf of Apargo Limited, Fentalon Limited, and Desimusco Trading Limited (the “Preferred Shareholders”), we filed, on April 8, 2025, a Motion for Reconsideration of the March 25, 2025 Order (ECF 1586, 1587). On April 28, 2025, we noticed the hearing for May 29, 2025, with responses due May 13 (ECF 1623).

After receipt of our motion approximately six weeks ago, and without ever addressing the May 13 date noticed for responses, at 10:30 p.m. last night Eletson Holdings Inc. filed its Objection to the Motion for Reconsideration (ECF 1664, 1665). The papers include 526 pages of exhibits.

In light of the timing of the voluminous opposition, and other scheduling matters, including overlapping deadlines in related litigation, we respectfully believe good cause exists for an adjournment. We believe it is important to have a reasonable opportunity to review and rebut the papers from last night, which under the circumstances warrants an adjournment for good cause.

Accordingly, we request a short adjournment of the response deadline to June 9, 2025, and an adjournment of the hearing date to June 12, 2025, or as soon thereafter as the Court is available.

We are very appreciative of the Court’s consideration of our request.

Respectfully,

/s/ *Hal S. Shaftel*

Hal S. Shaftel

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