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**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:

Following the Preferred Shareholders' modest request on Friday (ECF 1666) for an extension until June 9, 2025, for reply papers on their reconsideration motion, Reorganized Holdings defied professional courtesy and (strenuously) objected for entirely tactical reasons (ECF 1667). As we explained: (i) Reorganized Holdings took six weeks to oppose (as it filed at 10:30 p.m. its 30-page objection brief with 526 exhibit pages); (ii) Reorganized Holdings did not even show the courtesy to advise that it would not comply with the earlier noticed date (May 13) for its objection; and (iii) it is a requested extension on the Preferred Shareholders' *own* motion, so Reorganized Holdings can hardly claim any prejudice.

Further, Reorganized Holdings in its two-page letter nowhere takes account of the fact that the Preferred Shareholders have been fully occupied preparing substantial opposition papers to an Order to Show Cause brought by Levona, and purportedly joined (belatedly) by Reorganized Holdings itself, in the arbitration award case before Judge Liman. As Reorganized Holdings knows, those papers were due and filed on Sunday.

This is Reorganized Holdings just piling on. As a matter of fair process and professional courtesy, an adversary ought not resist an extension so as to impede an appropriate opportunity for responsive briefing;<sup>1</sup> indeed, the Court benefits from a full development of the arguments. We again are very appreciative of the Court's attentiveness to our request.

Respectfully,

/s/ *Hal S. Shaftel*

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<sup>1</sup> While of course not binding here, the New York State Unified Court System Standards of Civility, Sec. I, Rule III.A is instructive for New York professional norms: "a lawyer should agree to reasonable requests for extensions of time ...when the legitimate interests of the client will not be adversely affected." <https://www.nycourts.gov>.

