

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

:
Chapter 11

ELETSON HOLDINGS INC *et al.*,¹

:
Case No. 23-10322 (JPM)

:
Debtor.
-----X

**ORDER AUTHORIZING DISCOVERY PURSUANT TO
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Upon the application (the “Application”) of Eletson Holdings, Inc. (“Holdings”), for entry of an order (this “Order”), pursuant to section 105 of the Bankruptcy Code and Bankruptcy Rules 2004 and 9016, authorizing the Petitioning Creditors to issue subpoenas for the production of documents from (a) Lassia Investment Company (“Lassia”), Family Unit Trust Company (“Family Unit”), and Glafkos Trust Company (“Glafkos” and collectively with Lassia and Family Unit, the “Former Majority Shareholders”); and (b) Apargo Limited (“Apargo”), Fentalon Limited (“Fentalon”), and Desimusco Trading Company (“Desimusco” and collectively with Apargo and Fentalon, the “Purported Nominees” and collectively with the Former Majority Shareholders, the “Examination Parties”) to obtain information concerning the acts, conduct, and counsel related to implementation of the Plan (defined below) and the Confirmation Order; and the Court having jurisdiction to consider the Application and relief requested therein pursuant to 28 U.S.C. §§ 157

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 Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036.



and 1334; and it appearing that no other notice is necessary except as provided herein; and the relief requested therein raising a core proceeding under 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the relief sought being in the best interests of Holdings' estate, its creditors, and other parties in interest; and it appearing that good and sufficient cause for the relief sought in the Application exists, therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Holdings is authorized to issue subpoenas, for the production of documents, substantially in the forms attached hereto as Exhibit 1 and Exhibit 2, and for deposition testimony upon the Examination Parties, as applicable.
3. The subpoenas authorized by this Order may be served by FedEx or any other method of service permitted under Bankruptcy Rule 9016 or by other means agreed to by the subpoenaed entities or persons.
4. Holdings shall serve a copy of this Order with any subpoena that is served pursuant to this Order.
5. Any subpoena issued pursuant to this Order shall provide at least fourteen days' notice to the recipient to provide the recipient an opportunity to object in writing to the subpoena or to file any written motion with the Court.
6. If any entity or person who receives a subpoena for the production of documents pursuant to this Order withholds any documents on the basis of an asserted privilege, that entity is directed to provide a privilege log in accordance with Bankruptcy Rule 7026 to Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036, Attn: Kyle J. Ortiz, Esq. (kyle.ortiz@hsfkramer.com) and Brian F. Shaughnessy, Esq.

(brian.shaughnessy@hsfkramer.com), so as to be received with the document production required by the subpoena, or at such time as may be mutually agreed to by Holdings and the subpoenaed entity or person.

7. Holdings shall serve a copy of the Application and this Order by electronic mail, FedEx or any other method of service permitted under Bankruptcy Rule 9016 to the Notice Parties within two (2) business days of entry of this Order.

8. The entry of this Order is without prejudice to the rights of Holdings to apply for any other or further relief, including but not limited to, further relief under Bankruptcy Rule 2004.

9. The Court shall retain jurisdiction to hear and determine any and all matters arising from the interpretation and/or implementation of this Order.

Dated: New York, New York
June 16, 2025

/S/ John P. Mastando III
HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	§	
	§	Chapter 11
ELETSON HOLDINGS INC., <i>et al.</i> ¹	§	
	§	Case No. 23-10322 (JPM)
Debtors.	§	
	§	(Jointly Administered)
	§	

**ELETSON HOLDINGS INC.'S REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE
PURPORTED PREFERRED NOMINEES PURSUANT TO
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Federal Rule of Bankruptcy Procedure 2004, Eletson Holdings Inc., (“**Eletson**”), and its affiliated debtors in the above captioned chapter 11 cases (the “**Debtors**”), by and through their undersigned counsel, hereby serves this request for production of documents (the “**Requests**”) on the Purported Preferred Nominees.

Eletson demands that the Purported Preferred Nominees produce documents responsive to the Requests to **Brian Shaughnessy, Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036**, no later than [•], **2025 at 4:00 p.m. (prevailing Eastern time)**.

Each of the following Requests is to be read and produced in accordance with the definitions and instructions set forth below.

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 Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036.

DEFINITIONS

Notwithstanding anything else to the contrary herein, each word, term, or phrase used in these Requests is intended to have the broadest meaning permitted under Fed. R. Civ. Proc. 26 and 34, as made applicable herein by Fed. R. Bankr. Proc. 7026, 7034, and 9014. For purposes of these Requests, the following definitions will apply, regardless of whether the defined word is capitalized:

1. “All,” “each,” and “any” shall be construed to mean all, each, every, and any, so as to be expansive as possible.

2. The term “Affiliate” is defined to be synonymous in meaning and equal in scope to the usage of the term “affiliate” as such term is defined in section 101(2) of the Bankruptcy Code.

3. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of each document request all ocuments that might otherwise be construed to be outside of its scope.

4. “Arbitration” shall mean that certain JAMS arbitration proceeding entitled *Eletson Holdings, Inc., et. Al. v. Levona Holdings Ltd.*, JAMS Ref. No. 5425000511, before the Honorable Ariel Belen, and any related confirmation or vacatur proceeding.

5. The term “Bankruptcy Cases” means the bankruptcy cases captioned *In re Eletson Holdings, Inc., et al.*, Case No. 23-10322-(JPM) (Bankr. S.D.N.Y. 2023).

6. The term “Communication” or “Communications” means the transmittal of information in any form or medium including any letters, e-mail, instant messages, text messages, messages, messages sent over mobile-device chat services, including Instant Bloomberg, Bloomberg messages, BlackBerry Messenger, Google Hangouts, Apple iMessage, Facebook Messenger, WhatsApp, KakaoTalk, Line, Slack, WeChat, Snapchat, messages on other messaging

platforms, messages on other messaging platforms, telephone conversations (including recorded or taped telephone conversations and including messages left on cellular phones), correspondence, notes, facsimiles, facsimile confirmation sheets, blog entries, postings on internet websites, internal call notes, sales pipeline updates, or other forms of written or verbal intercourse (electronic or otherwise) and any Documents exchanged with or attached to such Communications.

7. “Confirmation Order” means the November 4, 2024, order confirming the Plan entered in the Bankruptcy Cases at docket number 1223.

8. The terms “concerning” and “relating to” shall mean concerning, relating to, referring to, reflecting, describing, involving, evidencing, constituting, or touching upon in any way, in whole or in part.

9. The term “Document” or “Documents” is used in the broadest possible sense allowable under Federal Rule of Civil Procedure 34(a)(1)(A) of the Federal Rules of Civil Procedure and Rule 1001 of the Federal Rules of Evidence, and shall include the original, all non-identical copies, and drafts of any tangible or intangible item from which information can be derived or discerned, and specifically includes any written, recorded, or graphic material of any kind, whether prepared by You or by any other Person, and whether in print or in electronic form, that is in Your possession, custody, or control. The term includes, without limitation, agreements; contracts; letters; telegrams; memoranda; reports; records; instructions; specifications; notebooks; scrapbooks; diaries; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; descriptions; drafts, whether or not they resulted in a final document; minutes of meetings, conferences, and telephone or other conversations or Communications; invoices; purchase orders; bills of lading; recordings; published or unpublished speeches or articles; publications; transcripts of telephone conversations; phone mail; ledgers; financial statements;

microfilm; microfiche; tape or disc recordings; and computer print-outs, letters, e-mails, text messages, instant messaging, and all forms of electronic data and other information stored on electronic media.

10. “Former Majority Shareholders” means, individually, and/or collectively, Lassia Investment Company, Family Unit Trust Company, and Glafkos Trust Company, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on each’s behalf.

11. “Former Minority Shareholders” means, individually, and/or collectively, Elafonissos Shipping Corporation and Keros Shipping Corporation, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

12. “Former Shareholders” means, individually, and/or collectively, the Former Majority Shareholders and the Former Minority Shareholders.

13. “Gas” means Eletson Gas LLC, including all of its purported officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

14. “Holdings” means Eletson Holdings Inc., including its purported officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

15. “Person” means any natural person, firm, corporation, unincorporated association, partnership, or other form of legal entity or governmental body, including affiliates, agents, and representatives.

16. “Plan” means the chapter 11 plan of reorganization filed in the Bankruptcy Cases at docket number 1132, exhibit 1.

17. “Preferred Shares” means the purported preferred interest or purported preferred units in Eletson Gas LLC.

18. “Purported Preferred Nominees” means, individually, and/or collectively, Apargo Limited, Fentalon limited, and Desimusco Trading Company, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

19. “Purported Provisional Board” means, individually, and/or collectively, Vassilis Chatzieleftheriadis, Konstatinos Chartzieleftheriadis, Ionnis Zilakos, Niki Zilakos, Adrianos Psomadakis-Karastamatis, Eleni Giannakopoulous, Panos Paxinoz, and Emmanuel Andreulaks.

20. “Purported Provisional Holdings” means the alleged juridical entity that certain Former Shareholders claim is controlled by the Purported Provisional Board and that Reed Smith LLP purports to represent in connection with matters arising subsequent to the effective date of the Plan in the Bankruptcy Cases.

21. “Vessels” means, individually, and/or collectively, any of the following vessels: *Fourni, Kastos, Kinaros, Kimolos, Anafi, Antikithira, Astipalea, Dilos, Ithacki, Kalolimnos, Kithira, Kithnos, Nisyros, Othoni, Paros, Symi, Telendos, Tilos*, and any other vessel in which Holdings, Gas, or any of their respective subsidiaries or affiliates holds, directly or indirectly, any legal or beneficial interest.

22. “You” and “your” means the person or entity responding to these Requests.

INSTRUCTIONS

1. These Requests encompass all documents in Your possession, custody, or control, whether or not such documents were prepared by or for You. Where documents in Your possession, custody, or control are requested or inquired of, such Request or inquiry includes Documents in the possession, custody, or control of each of Your current and former direct and indirect affiliates, subsidiaries, directors, employees, representatives, agents, advisors, attorneys, accountants, auditors and consultants, all other persons or entities acting or purporting to act on Your behalf or under Your control, any other persons or entities from whom You could obtain Documents, and each of their predecessors and successors.

2. If You contend that no Documents exist concerning all or part of a Request, You shall state this contention and respond as fully as possible to all parts of the Request for which Documents exist.

3. If You claim that any privilege or protection excuses production of any Document or part thereof, You must expressly make such claim in writing and describe the nature of each Document withheld on this ground, in sufficient detail for Eletson to determine whether there is an adequate basis for invoking privilege or protection.

4. In the event that any Document covered hereunder has been destroyed, discarded, or lost, You shall inform Eletson of this in writing and provide a general description of the categories of documents destroyed or lost and the circumstances of their destruction or loss.

5. If any Document cannot be produced in full, it shall be produced to the maximum extent possible and You shall specify in writing the reasons for Your inability to produce the remainder.

6. Each Document is to be produced with all non-identical copies and drafts thereof in their entirety without abbreviation or redaction (other than for a claim of privilege, consistent with these Instructions).

7. All Documents that are produced in electronic format shall be provided with: (i) Group W “tiff” images and IPRO-ready OPT files; (ii) a Concordance DAT delimited file with boundaries; (iii) full text OCR, with OCR text files provided on a document level; and (iv) all metadata fields associated with each electronic Document. Eletson also request that all spreadsheets created in Microsoft Excel or a similar spreadsheet program be produced in their native format. Eletson reserve’s its rights to request that other Documents be produced in their native format if necessary. The following metadata fields shall also be produced with all Documents produced in electronic format:

Field Name	Description
BEGDOC	An automatically-generated number assigned to first page of the Document
ENDDOC	An automatically-generated number assigned to last page of the Document
BEGATTACH	An automatically-generated number assigned to the first page of the parent Document in a family
ENDATTACH	An automatically-generated number assigned to the last page of an attachment in a Document family
PARENT_ID	The beginning DOCID for a parent Document
ATTACH_IDS	The beginning DOCID for all attachments
ATTCOUNT	The number of attachments to an email
DOC_TYPE	The type of file from the header (<i>e.g.</i> , Microsoft Outlook, Excel, Word, etc.)
PARENT_CHILD	A vendor-populated field where “P” denotes a parent Document and “A” denotes an attachment
PAGECOUNT	The number of pages of each individual Document
FROM	The name of the sender of an email, from the “From” field
TO	The recipient(s) of an email, from the “To” field

Field Name	Description
CC	The name(s) of any Person(s) to whom a copy of an email was sent, from the “CC” field
BCC	The name(s) of any Person(s) that were blind copied on an email, from the “BCC” field
SUBJECT	The text in the “Subject” line or “Re” line of an email or application file
CUSTODIAN	The name(s) of the Person(s) from which a collection of
AUTHOR	The name of the author or the creator of an application file, from the “Author” field
DATE_SENT	The date on which an email was sent
DATE_RCVD	The date on which an email was received
DATE_LASTMOD	The date on which an email or application file was last Modified
DATE_CREATED	The date an email or application file was created
TIME_CREATED	The time at which an email or application was created
TIME_SENT	The time at which an email was sent
TIME_RCVD	The time at which an email was received
TITLE	The text in the “Title” field of an application file
LAST_AUTHOR	The name in the “Last Author” field for an application file
LAST_SAVED	The date in the “Last Saved” field for an application file
LAST_PRINTED	The date in the “Last Printed” field for an application file
APPLICATION	The name of the application that generated the native file
FILEEXT	The filename extension of each email, attachment, or application file
FILENAME	The name of an application file, including its extension
FILESIZE	The size of a Document in bytes
SOURCEFOLDER	The full path information for email, attachments, and application files beginning with the original source-folder Name
HASHVALUE	The output of an algorithm-generated value for each individual file
SEARCH_HIT	The search term or terms that “hit” on a Document
NATIVE_FILE	A hyperlink to the native file

8. The use of the singular form of any word includes the plural and vice versa.

9. Unless stated otherwise, these Requests call for documents generated, transmitted or received on or after October 25, 2024, to the present (the “**Relevant Period**”).

10. These Requests shall be deemed to be continuing so as to require You to supplement Your responses if You or Your attorneys or agents become aware of, receive, or generate additional documents responsive to these Requests after the time of the initial response.

DOCUMENTS REQUESTED

1. All Documents and Communications regarding the Plan, the Confirmation Order, the Vessels, or the finances and/or bank accounts of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

2. All Documents and Communications regarding the Preferred Shares, from January 1, 2023, through the present.

3. All Documents and Communications regarding any attempts to alter the composition of the board of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates, beginning January 1, 2023, through the present.

4. All Documents and Communications concerning the control, and authority to control, Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

5. All Documents and Communications regarding any efforts to oppose the implementation and consummation of the Plan, the Confirmation Order, or the authority of “Reorganized Holdings” (as defined in the Plan), whether in the United States or outside of the United States.

6. All Documents and Communications regarding any efforts to support the Plan, the Confirmation Order, or the authority of “Reorganized Holdings” (as defined in the Plan), whether in the United States or outside of the United States.

7. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Plan or the Confirmation Order.

8. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Arbitration.

9. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Preferred Shares.

10. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the address of record of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

11. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Vessels.

12. All Documents and Communications regarding the assets, finances, and/or bank accounts, including, but not limited to, any attempts to access, use, maintain, or gain control of such assets, finances, and/or bank accounts, of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

13. All Documents and Communications regarding any payments that are due or that have been made to lawyers or law firms advocating on behalf of the Former Majority Shareholders, the Purported Preferred Nominees, the Purported Provisional Board, Purported Provisional Holdings, the Former Minority Shareholders, any members of the Purported Provisional Board, Laskarina Karastamati, Vassilis Hadjieleftheriadis, or Vassilis E. Kertsikoff.

14. All Documents and Communications regarding any actual or contemplated efforts, proposals, discussions, negotiations, analyses, marketing processes, or strategic reviews related to the management, refinancing, sale, disposition, chartering, leveraging, pledging, transfer, or other monetization of any interest in, or relating to, the Vessels or their associated income streams,

operating companies, holding companies, or beneficial ownership structures, from January 1, 2023, through the present.

New York, New York
Dated: [June [•]], 2025

/Draft/

**HERBERT SMITH FREEHILLS
KRAMER (US) LLP**

Kyle Ortiz
Brian Shaughnessy
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9132
Facsimile: (212) 715-8000
Email: kyle.ortiz@hsfkramer.com
Brian.shaughnessy@hsfkramer.com

Counsel to reorganized Eletson Holdings Inc.

EXHIBIT 2

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	§	
	§	Chapter 11
ELETSON HOLDINGS INC., <i>et al.</i> ¹	§	
	§	Case No. 23-10322 (JPM)
Debtors.	§	
	§	(Jointly Administered)
	§	

**ELETSON HOLDINGS INC.'S REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE
FORMER MAJORITY SHAREHOLDERS PURSUANT TO
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Federal Rule of Bankruptcy Procedure 2004, Eletson Holdings Inc., (“**Eletson**”), and its affiliated debtors in the above captioned chapter 11 cases (the “**Debtors**”), by and through their undersigned counsel, hereby serves this request for production of documents (the “**Requests**”) on the Former Majority Shareholders.

Eletson demands that the Former Majority Shareholders produce documents responsive to the Requests to **Brian Shaughnessy, Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036**, no later than [•], **2025 at 4:00 p.m. (prevailing Eastern time)**.

Each of the following Requests is to be read and produced in accordance with the definitions and instructions set forth below.

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 Herbert Smith Freehills Kramer (US) LLP, 1177 Avenue of the Americas, New York, New York 10036.

DEFINITIONS

Notwithstanding anything else to the contrary herein, each word, term, or phrase used in these Requests is intended to have the broadest meaning permitted under Fed. R. Civ. Proc. 26 and 34, as made applicable herein by Fed. R. Bankr. Proc. 7026, 7034, and 9014. For purposes of these Requests, the following definitions will apply, regardless of whether the defined word is capitalized:

1. “All,” “each,” and “any” shall be construed to mean all, each, every, and any, so as to be expansive as possible.

2. The term “Affiliate” is defined to be synonymous in meaning and equal in scope to the usage of the term “affiliate” as such term is defined in section 101(2) of the Bankruptcy Code.

3. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of each document request all documents that might otherwise be construed to be outside of its scope.

4. “Arbitration” shall mean that certain JAMS arbitration proceeding entitled *Eletson Holdings, Inc., et. Al. v. Levona Holdings Ltd.*, JAMS Ref. No. 5425000511, before the Honorable Ariel Belen, and any related confirmation or vacatur proceeding.

5. The term “Bankruptcy Cases” means the bankruptcy cases captioned *In re Eletson Holdings, Inc., et al.*, Case No. 23-10322-(JPM) (Bankr. S.D.N.Y. 2023).

6. The term “Communication” or “Communications” means the transmittal of information in any form or medium including any letters, e-mail, instant messages, text messages, messages, messages sent over mobile-device chat services, including Instant Bloomberg, Bloomberg messages, BlackBerry Messenger, Google Hangouts, Apple iMessage, Facebook Messenger, WhatsApp, KakaoTalk, Line, Slack, WeChat, Snapchat, messages on other messaging

platforms, messages on other messaging platforms, telephone conversations (including recorded or taped telephone conversations and including messages left on cellular phones), correspondence, notes, facsimiles, facsimile confirmation sheets, blog entries, postings on internet websites, internal call notes, sales pipeline updates, or other forms of written or verbal intercourse (electronic or otherwise) and any Documents exchanged with or attached to such Communications.

7. “Confirmation Order” means the November 4, 2024, order confirming the Plan entered in the Bankruptcy Cases at docket number 1223.

8. The terms “concerning” and “relating to” shall mean concerning, relating to, referring to, reflecting, describing, involving, evidencing, constituting, or touching upon in any way, in whole or in part.

9. The term “Document” or “Documents” is used in the broadest possible sense allowable under Federal Rule of Civil Procedure 34(a)(1)(A) of the Federal Rules of Civil Procedure and Rule 1001 of the Federal Rules of Evidence, and shall include the original, all non-identical copies, and drafts of any tangible or intangible item from which information can be derived or discerned, and specifically includes any written, recorded, or graphic material of any kind, whether prepared by You or by any other Person, and whether in print or in electronic form, that is in Your possession, custody, or control. The term includes, without limitation, agreements; contracts; letters; telegrams; memoranda; reports; records; instructions; specifications; notebooks; scrapbooks; diaries; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; descriptions; drafts, whether or not they resulted in a final document; minutes of meetings, conferences, and telephone or other conversations or Communications; invoices; purchase orders; bills of lading; recordings; published or unpublished speeches or articles; publications; transcripts of telephone conversations; phone mail; ledgers; financial statements;

microfilm; microfiche; tape or disc recordings; and computer print-outs, letters, e-mails, text messages, instant messaging, and all forms of electronic data and other information stored on electronic media.

10. “Former Majority Shareholders” means, individually, and/or collectively, Lassia Investment Company, Family Unit Trust Company, and Glafkos Trust Company, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on each’s behalf.

11. “Former Minority Shareholders” means, individually, and/or collectively, Elafonissos Shipping Corporation and Keros Shipping Corporation, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

12. “Former Shareholders” means, individually, and/or collectively, the Former Majority Shareholders and the Former Minority Shareholders.

13. “Gas” means Eletson Gas LLC, including all of its purported officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

14. “Holdings” means Eletson Holdings Inc., including its purported officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

15. “Person” means any natural person, firm, corporation, unincorporated association, partnership, or other form of legal entity or governmental body, including affiliates, agents, and representatives.

16. “Plan” means the chapter 11 plan of reorganization filed in the Bankruptcy Cases at docket number 1132, exhibit 1.

17. “Preferred Shares” means the purported preferred interest or purported preferred units in Eletson Gas LLC.

18. “Purported Preferred Nominees” means, individually, and/or collectively, Apargo Limited, Fentalon limited, and Desimusco Trading Company, including each’s officers, directors, co-founders, members, partners, employees, counsel, financial advisors, investment bankers, agents, officials, representatives, and all Persons and entities purporting to act on its behalf.

19. “Purported Provisional Board” means, individually, and/or collectively, Vassilis Chatzieleftheriadis, Konstatinos Chartzieleftheriadis, Ionnis Zilakos, Niki Zilakos, Adrianos Psomadakis-Karastamatis, Eleni Giannakopoulous, Panos Paxinoz, and Emmanuel Andreulaks.

20. “Purported Provisional Holdings” means the alleged juridical entity that certain Former Shareholders claim is controlled by the Purported Provisional Board and that Reed Smith LLP purports to represent in connection with matters arising subsequent to the effective date of the Plan in the Bankruptcy Cases.

21. “Vessels” means, individually, and/or collectively, any of the following vessels: *Fourni, Kastos, Kinaros, Kimolos, Anafi, Antikithira, Astipalea, Dilos, Ithacki, Kalolimnos, Kithira, Kithnos, Nisyros, Othoni, Paros, Symi, Telendos, Tilos*, and any other vessel in which Holdings, Gas, or any of their respective subsidiaries or affiliates holds, directly or indirectly, any legal or beneficial interest.

22. “You” and “your” means the person or entity responding to these Requests.

INSTRUCTIONS

1. These Requests encompass all documents in Your possession, custody, or control, whether or not such documents were prepared by or for You. Where documents in Your possession, custody, or control are requested or inquired of, such Request or inquiry includes Documents in the possession, custody, or control of each of Your current and former direct and indirect affiliates, subsidiaries, directors, employees, representatives, agents, advisors, attorneys, accountants, auditors and consultants, all other persons or entities acting or purporting to act on Your behalf or under Your control, any other persons or entities from whom You could obtain Documents, and each of their predecessors and successors.

2. If You contend that no Documents exist concerning all or part of a Request, You shall state this contention and respond as fully as possible to all parts of the Request for which Documents exist.

3. If You claim that any privilege or protection excuses production of any Document or part thereof, You must expressly make such claim in writing and describe the nature of each Document withheld on this ground, in sufficient detail for Eletson to determine whether there is an adequate basis for invoking privilege or protection.

4. In the event that any Document covered hereunder has been destroyed, discarded, or lost, You shall inform Eletson of this in writing and provide a general description of the categories of documents destroyed or lost and the circumstances of their destruction or loss.

5. If any Document cannot be produced in full, it shall be produced to the maximum extent possible and You shall specify in writing the reasons for Your inability to produce the remainder.

6. Each Document is to be produced with all non-identical copies and drafts thereof in their entirety without abbreviation or redaction (other than for a claim of privilege, consistent with these Instructions).

7. All Documents that are produced in electronic format shall be provided with: (i) Group W “tiff” images and IPRO-ready OPT files; (ii) a Concordance DAT delimited file with boundaries; (iii) full text OCR, with OCR text files provided on a document level; and (iv) all metadata fields associated with each electronic Document. Eletson also request that all spreadsheets created in Microsoft Excel or a similar spreadsheet program be produced in their native format. Eletson reserve’s its rights to request that other Documents be produced in their native format if necessary. The following metadata fields shall also be produced with all Documents produced in electronic format:

Field Name	Description
BEGDOC	An automatically-generated number assigned to first page of the Document
ENDDOC	An automatically-generated number assigned to last page of the Document
BEGATTACH	An automatically-generated number assigned to the first page of the parent Document in a family
ENDATTACH	An automatically-generated number assigned to the last page of an attachment in a Document family
PARENT_ID	The beginning DOCID for a parent Document
ATTACH_IDS	The beginning DOCID for all attachments
ATTCOUNT	The number of attachments to an email
DOC_TYPE	The type of file from the header (<i>e.g.</i> , Microsoft Outlook, Excel, Word, etc.)
PARENT_CHILD	A vendor-populated field where “P” denotes a parent Document and “A” denotes an attachment
PAGECOUNT	The number of pages of each individual Document
FROM	The name of the sender of an email, from the “From” field
TO	The recipient(s) of an email, from the “To” field

Field Name	Description
CC	The name(s) of any Person(s) to whom a copy of an email was sent, from the “CC” field
BCC	The name(s) of any Person(s) that were blind copied on an email, from the “BCC” field
SUBJECT	The text in the “Subject” line or “Re” line of an email or application file
CUSTODIAN	The name(s) of the Person(s) from which a collection of
AUTHOR	The name of the author or the creator of an application file, from the “Author” field
DATE_SENT	The date on which an email was sent
DATE_RCVD	The date on which an email was received
DATE_LASTMOD	The date on which an email or application file was last Modified
DATE_CREATED	The date an email or application file was created
TIME_CREATED	The time at which an email or application was created
TIME_SENT	The time at which an email was sent
TIME_RCVD	The time at which an email was received
TITLE	The text in the “Title” field of an application file
LAST_AUTHOR	The name in the “Last Author” field for an application file
LAST_SAVED	The date in the “Last Saved” field for an application file
LAST_PRINTED	The date in the “Last Printed” field for an application file
APPLICATION	The name of the application that generated the native file
FILEEXT	The filename extension of each email, attachment, or application file
FILENAME	The name of an application file, including its extension
FILESIZE	The size of a Document in bytes
SOURCEFOLDER	The full path information for email, attachments, and application files beginning with the original source-folder Name
HASHVALUE	The output of an algorithm-generated value for each individual file
SEARCH_HIT	The search term or terms that “hit” on a Document
NATIVE_FILE	A hyperlink to the native file

8. The use of the singular form of any word includes the plural and vice versa.

9. Unless stated otherwise, these Requests call for documents generated, transmitted or received on or after October 25, 2024, to the present (the “**Relevant Period**”).

10. These Requests shall be deemed to be continuing so as to require You to supplement Your responses if You or Your attorneys or agents become aware of, receive, or generate additional documents responsive to these Requests after the time of the initial response.

DOCUMENTS REQUESTED

1. All Documents and Communications regarding the Plan, the Confirmation Order, the Vessels, or the finances and/or bank accounts of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

2. All Documents and Communications regarding the Preferred Shares, from January 1, 2023, through the present.

3. All Documents and Communications regarding any attempts to alter the composition of the board of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates, beginning January 1, 2023, through the present.

4. All Documents and Communications concerning the control, and authority to control, Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

5. All Documents and Communications regarding any efforts to oppose the implementation and consummation of the Plan, the Confirmation Order, or the authority of “Reorganized Holdings” (as defined in the Plan), whether in the United States or outside of the United States.

6. All Documents and Communications regarding any efforts to support the Plan, the Confirmation Order, or the authority of “Reorganized Holdings” (as defined in the Plan), whether in the United States or outside of the United States.

7. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Plan or the Confirmation Order.

8. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Arbitration.

9. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Preferred Shares.

10. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the address of record of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

11. All Documents and Communications regarding any proceedings in the United States or outside of the United States concerning the Vessels.

12. All Documents and Communications regarding the assets, finances, and/or bank accounts, including, but not limited to, any attempts to access, use, maintain, or gain control of such assets, finances, and/or bank accounts, of Holdings, Gas, or any of their direct and indirect subsidiaries or affiliates.

13. All Documents and Communications regarding any payments that are due or that have been made to lawyers or law firms advocating on behalf of the Former Majority Shareholders, the Purported Preferred Nominees, the Purported Provisional Board, Purported Provisional Holdings, the Former Minority Shareholders, any members of the Purported Provisional Board, Laskarina Karastamati, Vassilis Hadjieleftheriadis, or Vassilis E. Kertsikoff.

14. All Documents and Communications regarding any actual or contemplated efforts, proposals, discussions, negotiations, analyses, marketing processes, or strategic reviews related to the management, refinancing, sale, disposition, chartering, leveraging, pledging, transfer, or other monetization of any interest in, or relating to, the Vessels or their associated income streams,

operating companies, holding companies, or beneficial ownership structures, from January 1, 2023, through the present.

New York, New York
Dated: [June [•]], 2025

/Draft/

**HERBERT SMITH FREEHILLS
KRAMER (US) LLP**

Kyle Ortiz

Brian Shaughnessy

1177 Avenue of the Americas

New York, New York 10036

Telephone: (212) 715-9132

Facsimile: (212) 715-8000

Email: kyle.ortiz@hsfkramer.com

Brian.shaughnessy@hsfkramer.com

Counsel to reorganized Eletson Holdings Inc.