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*Counsel for Eletson Holdings Inc.*

UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK

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

**CERTIFICATE OF NO OBJECTION REGARDING ELETSON HOLDINGS INC.’S  
 MOTION FOR EXTENSION OF DEADLINE TO FILE  
AVOIDANCE ACTIONS GOVERNED BY 11 U.S.C. § 546(a)**

On August 28, 2025, Eletson Holdings Inc. (“Holdings”) by and through its undersigned counsel filed *Eletson Holdings Inc.’s Motion for Extension of Deadline to File Avoidance Actions Governed by 11 U.S.C. § 546(a)* (the “Motion”) [Dkt. No. 1800]. Concurrent with the filing of the Motion, Holdings filed *Eletson Holdings Inc.’s Motion for an Order Authorizing the Filing Under Seal of Certain Exhibits and Information Relating to Eletson Holdings Inc.’s Motion for Extension*

<sup>1</sup> 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.



*of the Deadline to File Avoidance Actions Governed by U.S.C. § 546(a) (the “Sealing Motion”).*  
[Dkt. No. 1801].

A hearing on the Motion is currently set for September 18, 2025 at 10:00 a.m. (Prevailing Eastern Time). The deadline for the parties to object to the Motion was set for Thursday, September 11, 2025 at 4:00 p.m. (Prevailing Eastern Time) (the “Objection Deadline”).

In accordance with Local Rule 9013-3 and pursuant to the Court’s direction, the undersigned counsel hereby certifies that as of the date hereof, no objection to the Motion has been received. The undersigned counsel further certifies that it has reviewed the docket in this case and no answer, objection, or other response to the Motion appears thereon and it is filing this certificate of no objection more than forty-eight (48) hours after the expiration of the Objection Deadline.

DATED: September 16, 2025  
New York, New York

**HERBERT SMITH FREEHILLS  
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By:

/s/ Brian F. Shaughnessy

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