

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: ELETSON HOLDINGS INC, : Chapter 11  
: Case No. 23-10322 (JPM)  
Debtor/Judgment Creditor.<sup>1</sup> :  
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**STIPULATION AND PROPOSED ORDER EXTENDING TIME TO FILE REPLY TO  
ELETSON HOLDINGS INC.'S MOTION TO COMPEL THE ENTITY JUDGMENT  
DEBTORS' DEPOSITIONS IN AID OF JUDGMENT ENFORCEMENT [ECF 1910]**

WHEREAS, on December 8, 2025, Judgment Creditor Eletson Holdings Inc. ("Holdings") filed a motion to compel Lassia Investment Company, Glafkos Trust Company, Family Unity Trust Company, and Elafonissos Shipping Corporation (the "Entity Judgment Debtors")'s depositions in aid of judgment enforcement in this Court (ECF 1910, the "Motion"); and

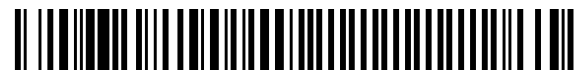
WHEREAS, this Court scheduled a hearing on the Motion (the "Hearing") for January 12, 2026 at 9 a.m. before the Honorable John P. Mastando III, United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy Court for the Southern District of New York (the "Court"), in Courtroom 723, located at One Bowling Green, New York, New York 10004.

WHEREAS, pursuant to the Local Bankruptcy Rule 9006-1, the reply in support of the Motion is currently due on December 29, 2025; and

WHEREAS, counsel for Holdings and counsel for the Entity Judgment Debtors have conferred and agreed to extend the deadline for filing the reply without prejudice to any party without affecting any other deadlines or scheduled hearings; and

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<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.



WHEREAS, this is the first request for an extension of time to file the reply; and

NOW, THEREFORE, THE PARTIES TO THIS STIPULATION AGREE AND  
STIPULATE, subject to the Court's approval, that:

1. The deadline to file the reply in support of the Motion is extended to, and including, January 5, 2026; and
2. All other deadlines and relief requested in the Motion remain unchanged.

Dated: December 26, 2025

Respectfully submitted,

GOULSTON & STORRS PC

/s/ Nathaniel R.B. Koslof

Jennifer B. Furey (admitted *pro hac vice*)

Nathaniel R.B. Koslof (admitted *pro hac vice*)

One Post Office Square, 28th Floor

Boston, MA 02109

jfurey@goulstonstorrs.com

nkoslof@goulstonstorrs.com

Tel: (617) 574-3575

Jaclyn Grodin

Rae Berger

730 Third Avenue, 12th Floor

New York, NY 10017

jgrodin@goulstonstorrs.com

rberger@goulstonstorrs.com

Tel: (212) 878-5065

*Attorneys for Eletson Holdings Inc.*

ROLNICK KRAMER SADIGHI LLP

/s/ Justin Harris

Lawrence M. Rolnick

lrolnick@rksllp.com

Richard A. Bodnar

rbodnar@rksllp.com

Frank T.M. Catalina

fcatalina@rksllp.com

Justin Harris

jharris@rksllp.com

Penn 1, Suite 3401

One Pennsylvania Plaza

New York, New York 10119

Tel: 212.597.2800

*Attorneys for Judgment Debtors Lassia  
Investment Company, Glafkos Trust  
Company, Family Unity Trust Company, and  
Elafonissos Shipping Company*

SO ORDERED:

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U.S.B.J.