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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
ELETSON HOLDINGS INC.,[1]	:	Case No. 23-10322 (JPM)
Debtor.	:	

CERTIFICATE OF NO OBJECTION REGARDING THE COURT'S ORDER TO SHOW CAUSE DATED MAY 18, 2026

On May 18, 2026, upon the *Memorandum of Law in Support of Entry of an Order Authorizing and Directing Verisign, Inc. to Change the Current Registrar of Record for the Eletson.com Domain Name* [Dkt. No. 2033] and the *Declaration of Mark Lichtenstein Pursuant to Local Bankruptcy Rule 9077-1* [Dkt. No. 2034] (collectively, the "Motion') filed in support thereof by Eletson Holdings Inc. ("Holdings") by and through its undersigned counsel, the Court entered an *Order to Show Cause* [Dkt. No. 2031] (the "Order to Show Cause") ordering Verisign, EuroDNS S.A., Porkbun, LLC or any other interested party to **SHOW CAUSE** as to why an order

[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.

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(the "Proposed Order") should not be entered authorizing and directing Verisign to change the current registrar of record for the eletson.com domain name.

Upon entry of the Order to Show Cause, Holdings served the foregoing papers in the methods required by the Order to Show Cause and filed Affidavits of Service detailing such compliance [Docket No. 2040 and 2041].

A hearing on the Motion is currently set for May 28, 2026 at 2:00 p.m. (Prevailing Eastern Time). The deadline for the parties to object to the Motion was set for Friday, May 22, 2026 at 12:00 p.m. Eastern Time (the "Objection Deadline").

The undersigned counsel received informal comments on the Proposed Order from Porkbun. Based on these comments, a revised Proposed Order is attached as **Exhibit A** and a redline to the original form of the Proposed Order is attached as **Exhibit B**.

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 was filed before the Objection deadline, and no informal comments were received other than from Porkbun, as mentioned above. 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: May 26, 2026
New York, New York

HERBERT SMITH FREEHILLS KRAMER (US) LLP
By:

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Counsel for Eletson Holdings Inc.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: ELETSON HOLDINGS INC,	:	Chapter 11
	:	Case No. 23-10322 (JPM)
Debtor.[1]	:	

ORDER AUTHORIZING AND DIRECTING VERISIGN, INC. TO CHANGE THE CURRENT REGISTRAR OF RECORD FOR THE ELETSON.COM DOMAIN NAME

Upon the motion by order to show cause and accompanying memorandum of law (collectively, the "Motion")[2] of Eletson Holdings Inc. ("Holdings"), for entry of an order (this "Order") authorizing and directing Verisign, Inc. ("Verisign"), as the registry operator for the .com top-level domain, to change the current registrar of record for the eletson.com domain name, presently registered with EuroDNS S.A. ("EuroDNS") in Verisign's .com registry (the "Domain"); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order, 11 U.S.C. §§ 105, 542 and 1142, and the Court's inherent jurisdiction to interpret and enforce its own orders (including the Confirmation Order); and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and no other or further notice need be provided; and it appearing that the relief requested in the Motion is in the best interests of Holdings; and the Court having reviewed the Motion and heard the statements of counsel at a hearing on the Motion, if any (the "Hearing");

[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.

[2] Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

and the Court having determined that the legal and factual bases set forth in the Motion and at the record of the Hearing (if any), establish just cause for the relief granted herein; and the Court having determined that the relief requested is in the best interests of Holdings, and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.

2. This Order shall supersede the Order to Show Cause [Docket No. 2031] to the extent the Order to Show Cause is inconsistent with the relief granted herein.

3. Verisign is authorized and directed to change the current registrar of record for the Domain from EuroDNS S.A. (IANA Registrar ID 1052), or such other registrar holding the Domain, to Porkbun, LLC (IANA Registrar ID 1861) ("Porkbun"), or to such other ICANN-accredited registrar domiciled in the United States as Holdings shall designate in writing (the "Gaining Registrar").

4. The Gaining Registrar is authorized, upon its appointment as current registrar for the Domain, to create or assign a registrant-level account for the Domain in the name of Holdings and/or its designee (and with respect to Porkbun, under the account associated with username MarkLichtenstein, company name Eletson Holdings Inc. and e-mail mark.lichtenstein@eletsonholdings.com), and to update all registrar-side contact and technical records as directed by Holdings and/or its designee.

5. Verisign and Holdings (or its Designee) are authorized to take all such actions as are necessary or appropriate to comply with and to implement the terms of this Order, including, without limitation, transmission of registry-registrar protocol messages effecting the registrar change.

6. Verisign's compliance with this Order constitutes a good-faith reliance on a court order for all purposes, including without limitation as a defense to any claim for damages or other relief that any third party (including EuroDNS) may assert against Verisign arising out of or relating to such compliance.

7. By no later than three (3) business days following the entry of this Order, Holdings shall serve a copy of this Order, by first class mail and e-mail, upon (i) Verisign, Inc., Attn: Office of the General Counsel, 12061 Bluemont Way, Reston, Virginia 20190; (ii) the Gaining Registrar; and (iii) EuroDNS S.A., 24 rue Léon Laval, L-3372 Leudelange, Grand Duchy of Luxembourg.

8. Nothing in this Order shall be construed to limit the right of Holdings to access, control, or transfer the Domain, or the authority of Verisign or the Gaining Registrar to provide such access, control, or transfer.

9. EuroDNS shall not take any action that would obstruct, delay, or interfere with Verisign's compliance with this Order, including, without limitation, by placing or maintaining any registrar lock or transfer-prohibited status code on the Domain inconsistent with the registrar change directed herein, or by initiating any reverse-transfer or dispute proceeding with respect to the Domain.

10. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.

11. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

DATED: New York, New York
_____, 2026

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: ELETSON HOLDINGS INC,	:	Chapter 11
	:	Case No. 23-10322 (JPM)
Debtor.[1]	:	

ORDER AUTHORIZING AND DIRECTING VERISIGN, INC. TO CHANGE THE CURRENT REGISTRAR OF RECORD FOR THE ELETSON.COM DOMAIN NAME

Upon the motion by order to show cause and accompanying memorandum of law (collectively, the "Motion")[2] of Eletson Holdings Inc. ("Holdings"), for entry of an order (this "Order") authorizing and directing Verisign, Inc. ("Verisign"), as the registry operator for the .com top-level domain, to change the current registrar of record for the eletson.com domain name, presently registered with EuroDNS S.A. ("EuroDNS") in Verisign's .com registry (the "Domain"); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order, 11 U.S.C. §§ 105, 542 and 1142, and the Court's inherent jurisdiction to interpret and enforce its own orders (including the Confirmation Order); and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and no other or further notice need be provided; and it appearing that the relief requested in the Motion is in the best interests of Holdings; and the Court having reviewed the

[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.

[2] Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Motion and heard the statements of counsel at a hearing on the Motion, if any (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion and at the record of the Hearing (if any), establish just cause for the relief granted herein; and the Court having determined that the relief requested is in the best interests of Holdings, and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.

2. This Order shall supersede the Order to Show Cause [Docket No. ~~—~~2031] to the extent the Order to Show Cause is inconsistent with the relief granted herein.

3. Verisign is authorized and directed to change the current registrar of record for the Domain from EuroDNS S.A. (IANA Registrar ID 1052), or such other registrar holding the Domain, to Porkbun, LLC (IANA Registrar ID 1861) ("Porkbun"), or to such other ICANN-accredited registrar domiciled in the United States as Holdings shall designate in writing (the "Gaining Registrar").

4. The Gaining Registrar is authorized, upon its appointment as current registrar for the Domain, to create or assign a registrant-level account for the Domain in the name of Holdings and/or its designee (and with respect to Porkbun, under the account associated with username MarkLichtenstein, company name Eletson Holdings Inc. and e-mail mark.lichtenstein@eletsonholdings.com), and to update all registrar-side contact and technical records as directed by Holdings and/or its designee.

5. Verisign and Holdings (or its Designee) are authorized to take all such actions as are necessary or appropriate to comply with and to implement the terms of this Order, including,

without limitation, transmission of registry-registrar protocol messages effecting the registrar change.

6. Verisign's compliance with this Order constitutes a good-faith reliance on a court order for all purposes, including without limitation as a defense to any claim for damages or other relief that any third party (including EuroDNS) may assert against Verisign arising out of or relating to such compliance.

7. By no later than three (3) business days following the entry of this Order, Holdings shall serve a copy of this Order, by first class mail and e-mail, upon (i) Verisign, Inc., Attn: Office of the General Counsel, 12061 Bluemont Way, Reston, Virginia 20190; (ii) the Gaining Registrar; and (iii) EuroDNS S.A., 24 rue Léon Laval, L-3372 Leudelange, Grand Duchy of Luxembourg.

8. Nothing in this Order shall be construed to limit the right of Holdings to access, control, or transfer the Domain, or the authority of Verisign or the Gaining Registrar to provide such access, control, or transfer.

9. EuroDNS shall not take any action that would obstruct, delay, or interfere with Verisign's compliance with this Order, including, without limitation, by placing or maintaining any registrar lock or transfer-prohibited status code on the Domain inconsistent with the registrar change directed herein, or by initiating any reverse-transfer or dispute proceeding with respect to the Domain.

10. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.

11. This Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

DATED: New York, New York
_____, 2026

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HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

Summary report: **Litera Compare for Word 11.11.0.158 Document comparison done on 05/24/2026 8:54:41 PM**	
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Embedded Excel	0
Format changes	0
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