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through partnership

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July 17, 2025

Via ECF

Honorable John P. Mastando  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

**Re: *In re Eletson Holdings, Inc., et al.*, Bankr. S.D.N.Y. 1:23-bk-10322 (JPM)**

Dear Judge Mastando:

As ordered by this Court, we write on behalf of Provisional Eletson Holdings Inc. ("Provisional Holdings") regarding the *Application for Attorneys' Fees and Costs* (Dkt. 1729) and supporting declarations (Dkt. 1730, 1731, 1732) (the "*Application*") filed by Reorganized Holdings Inc. ("Reorganized Holdings") between 11:15 p.m. and 12:06 a.m. last night and to request a brief, eight-day extension of the July 23, 2025 deadline to respond to the Application (*see* Dkt. 1712 ¶ 2), to July 31, 2025. There is no hearing date currently scheduled for the Application (*see id.*).

There is good cause for the requested extension given the immediate deadlines that Provisional Holdings and its counsel have in the Second Circuit and the District Court next week in connection with these and related matters, including appellate briefing deadlines in the District Court (July 23) and preparation for the deposition of Reed Smith LLP's corporate representative, currently scheduled for July 24, in the District Court arbitration proceedings. To that end, the Application includes 88 pages of invoices/time-entries and three declarations. Respectfully, a modest eight-day extension is necessary to provide Provisional Holdings and its counsel with time to review in detail the briefing, time-entries and the declarations in order to adequately respond to the Application.

We appreciate Your Honor's consideration of this matter.

Respectfully submitted,

Louis M. Solomon

cc. Counsel of Record

To the extent purported Provisional Holdings exists [*see* ECF Docket No. 1697, June 6, 2025 Decision by the First Instance of Piraeus in Greece ordering that the ex parte "petition under consideration must be dismissed as inadmissible"], the request for an extension through and including July 31, 2025 is **GRANTED**. The Court also notes that Reed Smith was not "ordered" by the Court to write, or take any other action, on behalf of purported Provisional Holdings (to the extent it exists). In the May 13, 2025 *Opinion and Order Denying Without Prejudice Reed Smith's Motion to Withdraw Its Limited Representation of Purported Provisional Eletson Holdings Inc.* the Court determined that "[the] denial without prejudice of the Motion to Withdraw is not in any way expressing any approval of, or any opinion regarding, the propriety of Reed Smith's representation . . . of purported Provisional Eletson Holdings . . . in connection with these or any other proceedings." (ECF Docket No. 1655). Purported Provisional Holdings (to the extent it exists) is free to attempt to retain whatever counsel it chooses as appropriate.

It is **SO ORDERED**.

Dated: New York, New York  
July 17, 2025



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UNITED STATES BANKRUPTCY COURT