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through partnership

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August 6, 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:

We write on behalf of the Eletson Holdings Inc. entity that the Second Circuit recognizes as being represented by Reed Smith (referred to herein as “Reed Smith’s client”) to respond to the email submission this afternoon from Herbert Smith Freehills Kramer of a proposed form of judgment against, among other entities, Reed Smith’s client. In light of the pendency of multiple appeals of the orders that underlie the proposed form of judgment, we submit that entry of that judgment is premature. We ask for the opportunity to respond more fully on the proposed judgment by Friday, August 8.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Louis M. Solomon".

Louis M. Solomon

cc. Counsel of Record

