



Driving progress
through partnership

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August 12, 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 respectfully write on behalf of the Eletson Holdings Inc. entity that the Second Circuit recognizes as being represented by Reed Smith LLP (“Reed Smith”) in connection with the reply letter (Dkt. 1774) filed by Herbert Smith Freehills Kramer (“Herbert Smith”) concerning its proposed judgment. After the defects in its initial submission were pointed out in letters filed by Reed Smith (Dkt. 1770) and Rolnick Kramer Sadighi LLP (Dkt. 1769) on behalf of their respective clients, Herbert Smith has now for the first time raised new arguments and cited new cases not previously included in its original email to Chambers, giving respondents no opportunity to address them.

Reed Smith requests the opportunity to respond to those new arguments by Friday, August 15, 2025.

Respectfully submitted,

Louis M. Solomon

cc. Counsel of Record

