

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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:
In re: : Chapter 11
:
ELETSON HOLDINGS INC.,¹ : Case No. 23-10322 (JPM)
:
:
Debtor. :
:
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**DEBTOR-APPELLEE'S DESIGNATION OF
ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Under Rule 8009 of the Federal Rules of Bankruptcy Procedure
(the "Bankruptcy Rules"), Appellee Eletson Holdings, Inc. ("Appellee" or the "Debtor"),
submits this designation of additional items to be included in the record on appeal² with respect
to purported Provisional Holdings' appeal [*see* ECF No. 1723]³ of the July 2, 2025, order [ECF
No. 1712] and the May 15, 2025 oral decision incorporated therein [ECF No. 1696] in the United
States Bankruptcy Court for the Southern District of New York in Case No. 23-10322 (JPM).

Specifically, Appellee designates the following additional items to be included in
addition to those designated by the appellant [ECF No. 1748] in the record on appeal:⁴

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 Debtor reserves all rights to move to strike Appellant's designation of items on appeal that have been improperly included in the record. *See* Federal Rule of Bankruptcy Procedure 8009(e).

³ Given the voluminous number of appeals filed in this case, Appellee notes that this designation of additional items to be included in the record on appeal relates to the appeal pending in the District Court for the Southern District of New York under case number 25-cv-06164.

⁴ The items designated herein include all exhibits and attachments to such items.



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Designation No.	Date	ECF No.	Description
1.	03/27/2025	1569	Notice of Hearing and Eletson Holdings Inc.'s Motion for an Order Extending Time to Object to Claims filed by Bryan Kotliar on behalf of Eletson Holdings Inc.
2.	05/01/2025	1636	Transcript regarding Hearing Held on April 30, 2025 at 10:04 AM
3.	07/07/2025	1713	Notice of Filing of Transcript of July 2, 2025 Status Conference filed by Kyle J. Ortiz on behalf of Reorganized Eletson Holdings Inc.

Admitted Exhibits from the January 6, 2025 Hearing [Dkt. 1343]

Trial Exhibit No.	Description
TX-1	Stipulation and Agreement to Dismiss Appeal Under Rule 8023 of the Federal Rules of Bankruptcy Procedure
TX-2	November 12, 2024 SDNY Hearing Transcript
TX-3	November 20, 2024 Letter from L. Solomon to Judge Liman
TX-4	November 12, 2024 Letter from L. Solomon to Judge Mastando
TX-5	Reorganized Eletson Holdings Togut Retention Letter
TX-6	October 28, 2024 Email from L. Ebrahimi to D. Baker at 9:04 a.m.
TX-7	October 30, 2024 Email from B. Kotliar to D. Baker at 10:20 a.m.
TX-8	November 5, 2024 Email from B. Kotliar to D. Baker at 5:34 p.m.
TX-9	October 28, 2024 Email from D. Baker to B. Kotliar at 5:39 p.m.
TX-10	November 8, 2024 Email from D. Baker to B. Kotliar at 4:38 p.m.
TX-11	November 11, 2024 Email from D. Baker to B. Kotliar at 1:57 p.m.
TX-12	November 12, 2024 Email from D. Baker to B. Kotliar at 5:51 p.m.
TX-13	November 13, 2024 Hearing Transcript
TX-14	November 12, 2024 Email from B. Kotliar to D. Baker at 7:25 a.m.

TX-15	November 17, 2024 Email from L. Solomon to B. Kotliar at 4:23 p.m.
TX-16	Restriction Letter
TX-17	November 21, 2024 Letter from L. Solomon to Judge Liman
TX-18	November 21, 2024 Termination Letter
TX-19	TradeWinds Article
TX-20	May 15, 2024 Hearing Transcript
TX-21	Declaration of James Pierre Pursuant to 28 U.S.C. § 1746
TX-22	Rebuttal Declaration of James Pierre Pursuant to 28 U.S.C. § 1746
TX-23	September 11, 2024 Hearing Transcript
TX-24	Email from Derek J. Baker to Bryan M. Kotliar Regarding Eletson Holdings, Inc., Bankr. S.D.N.Y. 23-10322 - Payment of Fees to Reed Smith
TX-25	Eletson Corp, Action by Unanimous Written Consent of the Board of Directors
TX-26	Eletson Corp, Action by Written Consent of the Stockholders of Eletson Corp in Lieu of a Meeting
TX-27	Eletson Gas, Action by Written Consent of the Common Unit Holder of Eletson Gas
TX-28	Eletson Gas, Action by Unanimous Written Consent of the Board of Directors
TX-29	Eletson Gas, Action by Unanimous Written Consent of the Board of Directors
TX-30	Eletson Gas, Action by Written Consent of the Common Unit Holder of Eletson Gas
TX-31	Greek Petition (certified English translation)
TX-32	Ballot submitted by Elafonissos Shipping Corp., signed by Ionnis Zilakos.
TX-33	Ballot submitted by Keros Shipping Corp., signed by Emmanouil Andreolakis

TX-34	Ballot submitted by Glafkos Trust Company, signed by Vasileios Chatzieleftheriadis
TX-35	Ballot submitted by Lassia Investment Company, signed by Lascarina Karastamati
TX-36	Ballot submitted by Family Unity Trust Company, signed by VK Kertsikoff
TX-37	Declaration of Vasilis Hadjieleftheriadis in Support of Second Amended Joint Plan of Reorganization of Debtors under Chapter 11 of the United States Code
TX-38	Deposition of Vasilis A. Hadjieleftheriadis, dated September 3, 2024
TX-39	December 5, 2024 Email from Bryan Kotliar to Vasilis Hadjieleftheriadis, including attachments of the Sanctions Motion [ECF 1268]; and Notice of Adjournment of Hearing [ECF 1277]
TX-40	December 23, 2024 SDNY Hearing Transcript
TX-41	December 27, 2024 Email from L. Solomon to Jennifer Furey re Eletson Holdings Inc.
TX-42	November 21, 2024 Letter from Peter J. Kennedy to Adam Spears re Eletson Boldin.gs Client Files
TX-43	December 3, 2024 Letter from L. Solomon to Jennifer Furey re Eletson Holdings Inc. and its Subsidiaries
TX-44	December 30, 2024 Letter from Jennifer Furey to Judge Liman re Eletson Client Files
TX-45	November 27, 2024 Email from M. Papanikolaki to M. Gonzalez re EMC Investment Corporation BI Confirmation
TX-46	December 10, 2024 Email from M. Papanikolaki to M. Gonzalez re Kastos & Fourni With Novum, Wrong Acct. Payment of Dec. Hires (including attachments)
TX-47	December 12, 2024 Email from M. Papanikolaki to J. Lang and S. Burbridge re Kastos & Fourni With Novum, Wrong Acct. Payment of Dec. Hires
TX-48	December 23, 2024 Email from P. Gilatis to V. Chopra re M / T KASTOS / NOVUM -TC/ P 12 JAN.23 -REF.NO.: 165TC - JAN 25 HIRE (NEW BANK DETAILS-ABN) (including attachments)

TX-49	January 2, 2025 Email from Novum to Eletson re Kastos/Fourni with Novum
TX-50	E-mail from B. Kotliar to William Curtin dated January 3, 2025
TX-51	January 2, 2025 Letter by Togut to Judge Mastan.do
TX-52	Closing Checklist
TX-53	Reed Smith October 28 Response Email
TX-54	Togut October 28 Response Email
TX-55	Reed Smith October 30 Email
TX-56	Togut October 30 Response Email
TX-57	Reed Smith October 30 Response Email
TX-58	Togut November 4 Email
TX-59	Togut November 5 Email
TX-60	Reed Smith November 6 Email
TX-61	Reed Smith November 8 Email
TX-62	Togut November 11 Email
TX-63	Reed Smith November 11 Response Email
TX-64	Togut November 12 Email
TX-65	Reed Smith November 12 Response Email
TX-66	Togut November 12 Response Email
TX-67	Authorization Letter
TX-68	Togut November 13 Email
TX-69	Reed Smith November 14 Daniolos Email
TX-70	Reed Smith November 15 Email
TX-71	Togut November 15 Response Email

TX-72	Reed Smith November 17 Email
TX-73	Spears Letter
TX-74	Togut District Court Letter
TX-75	November 21 Adam Spears Letter
TX-76	Hockinson Email
TX-77	Togut November 26 Email
TX-78	Reed Smith November 27 Response Email
TX-79	Togut November 27 Response Email
TX-80	Daniolos Letter
TX-81	Excerpt of Greek Order with Counsel's Translation
TX-82	November 1 Email
TX-83	Eletson Holdings, Inc. Restated Articles of Incorporation
TX-84	Eletson Holdings, Inc.'s Amended By-Laws
TX-85	Compilation of Messages to Employees
TX-86	November 28 Email
TX-87	November 19 Berenberg Bank Letter
TX-88	November 24 Email
TX-89	Eletson Gas LLC Agreement
TX-90	Declaration of Betty Lamin-Blamo
TX-91	The Liberian Business Corporation Act
TX-92	Amended Disclosure Statement in Support of Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-93	Notice of Filing of Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors

TX-94	Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-95	Notice of Filing of Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-96	Memorandum Opinion and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors, Sustaining Objections to Competing Plans, and Denying Motions in Limine
TX-97	Findings of Fact, Conclusions of Law, and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Eletson Holdings Inc. and its Affiliated Debtors
TX-98	Notice of Filing of Third Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-99	Notice of (I) the Occurrence of the Effective Date and (II) Final Deadlines for Filing Certain Claims
TX-100	Togut Letter, dated December 18, 2024 regarding Liberian Court filings
TX-101	Eletson Holdings, Action by Written Consent of the Stockholders of Eletson Holdings in Lieu of a Meeting, dated November 19, 2024
TX-102	January 3, 2025 Letter by Reed Smith in response to Goulston & Storrs December 30, 2024 Letter Motion
TX-103	January 3, 2025 Order Denying Goulston Letter Motion
TX-104	Eletson Holdings Liberian Certificate of Incumbency
TX-105	E-mail from Adam Spears to Vasilis Hadjieleftheriadis, dated December 27, 2024
TX-106	E-mail from Adam Spears to Vasilis Hadjieleftheriadis, Vassilis Kertsikoff, and Lascarina Karastamati dated January 3, 2025
TX-107	Declaration of Vasilis Hadjieleftheriadis In Support of Debtor's Opposition to the Motion to Appoint a Trustee (Filed Under Seal)
TX-108	Objection of the Majority Shareholders of Eletson Holdings Inc. to Sanctions Motion

TX-109	Majority Shareholders' Response to Reorganized Holdings' Motion for an Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
TX-110	Provisional Holdings' Joinder to Majority Shareholders' Response to Reorganized Holdings' Motion for an Order (I) Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
TX-111	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Reorganized Holdings Inc. for an Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, including Reed Smith LLP
TX-112	Notice of filing Second Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
TX-113	December 16, 2024 Hearing Transcript
TX-114	E-mail from Bryan Kotliar to William Curtin, dated December 17, 2024
TX-115	E-mail from Bryan Kotliar to William Curtin, dated December 18, 2024
TX-116	E-mail from Bryan Kotliar to William Curtin, dated December 19, 2024
TX-117	E-mail from Bryan Kotliar to William Curtin, dated December 20, 2024
TX-118	E-mail from Bryan Kotliar to William Curtin, dated December 21, 2024
TX-119	E-mail from Bryan Kotliar to William Curtin, dated December 22, 2024
TX-120	E-mail from Bryan Kotliar to William Curtin, dated December 26, 2024
TX-121	December 20, 2024 Hearing Transcript Bankruptcy Court
TX-122	November 13, 2024 Letter from Reed Smith
TX-123	Liberian General Construction Law
TX-124	Liberian BCA Amendment (2022)
TX-125	Eletson Holdings Articles of Amendment of Articles of Incorporation
TX-126	Liberian Recognition Proceeding

TX-127	Motion to Dismiss Liberian Recognition Proceeding
TX-128	Notice of Voluntary Discontinuance of Liberian Recognition Proceeding

DATED: August 13, 2025
New York, New York

HERBERT SMITH FREEHILLS KRAMER
(US) LLP

By:

/s/ Kyle Ortiz

Kyle J. Ortiz

Brian F. Shaughnessy

Jennifer Sharret

Andrew J. Citron

1177 Avenue of the Americas

New York, New York 10036

(212) 715-9100

Email: Kyle.ortiz@hsfkramer.com

Brian.shaughnessy@hsfkramer.com

Jennifer.sharret@hsfkramer.com

Andrew.citron@hsfkramer.com

Counsel for Eletson Holdings Inc.