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Counsel for Eletson Holdings Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
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ELETSON HOLDINGS INC., ¹	:	Case No. 23-10322 (JPM)
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Debtor.	:	
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**NOTICE OF HEARING ON ELETSON HOLDINGS INC.’S MOTION FOR AN ORDER
EXTENDING TIME TO OBJECT TO CLAIMS**

PLEASE TAKE NOTICE that on October 14, 2025, Eletson Holdings Inc. filed *Eletson Holdings Inc.’s Motion For an Order Extending Time to Object to Claims* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the court has scheduled a hearing on the Motion (the “Hearing”) for **November 3, 2025 at 11:00 A.M. (Prevailing Eastern Time)** before the Honorable John P. Mastando III, United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy Court for the Southern District of New York (the “Court”), in Courtroom 501, located at One Bowling Green, New York, New York 10004.

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.



PLEASE TAKE FURTHER NOTICE that the hearing shall be held via “Zoom for Government” before the Honorable John P. Mastando III, United States Bankruptcy Judge in the United States Bankruptcy Court for the Southern District of New York. Parties wishing to participate on a “live” or a “listen only” line must make an electronic appearance through the “eCourtAppearances” tab on the Court’s website:

<https://www.nysb.uscourts.gov/ecourt-appearances>, no later than **November 2, 2025, at 4:00 P.M. (Prevailing Eastern Time) (the “Appearance Deadline”)**. Following the Appearance Deadline, the Court will circulate by e-mail the Zoom link to those parties who have made an electronic appearance. Further information on the use of Zoom for Government can be found at the Court’s website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that, responses, if any, to the Motion must be made in writing, stating in detail the reasons therefor, and must be filed with the Clerk of the Court, so as to actually be received by the Honorable Juge Mastando III, with electronic copies emailed to Chambers at: JPM.chambers@nyscb.uscourts.gov, and upon: (i) Herbert Smith Freehills Kramer (US) LLP *counsel for Eletson Holdings Inc.*, 1177 Avenue of the Americas, New York, New York 10036, Attn: Kyle J. Ortiz, Esq. (kyle.ortiz@hsfkramer.com); and Brian F. Shaughnessy, Esq. (brian.shaughnessy@hsfkramer.com); and (ii) the Office of the United States Trustee for Region 2, Attn: Daniel Rudewicz, Esq. (Daniel.Rudewicz@usdoj.gov), One Bowling Green, Room 534, New York, New York 10004-1408, no later than **October 27, 2025 (the “Responses Deadline”)**. Replies, if any, must be filed no later than **October 30, 2025 (the “Reply Deadline”)**.

PLEASE TAKE FURTHER NOTICE that all case filings can be viewed and/or obtained by: (i) accessing the Court’s website www.nysb.uscourts.gov or by (ii) contacting the Office of the Clerk of the Court at the United States Bankruptcy Court for the Southern District of New York.

DATED: October 14, 2025
New York, New York

HERBERT SMITH FREEHILLS KRAMER (US)
LLP

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Counsel for Eletson Holdings Inc.

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**ELETSON HOLDINGS INC.’S MOTION FOR AN
ORDER EXTENDING TIME TO OBJECT TO CLAIMS**

Eletson Holdings Inc. (“Holdings”), by and through its undersigned counsel, hereby submits this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the deadline established under Holdings’ chapter 11 plan of reorganization [Docket No. 1132, Ex. 1] (the “Plan”)² for Holdings to object to claims from November 18, 2025 to May 18, 2026, subject to further extensions, and respectfully states:

JURISDICTION

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States Court for the Southern District of New York*, dated January 31, 2012. This is a core proceeding under 28 U.S.C. § 157(b).

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 used but not otherwise defined herein have the meanings ascribed to such terms in the Plan.

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Pursuant to Section 11.1 of the Plan and Paragraph WW of the Confirmation Order (as defined below), the Court retains exclusive jurisdiction over all matters arising out of, and related to, the chapter 11 cases, including the matters set forth in Article XI of the Plan and section 1142 of the Bankruptcy Code.

BACKGROUND

4. On November 4, 2024, the Court entered an order confirming the Plan [Docket No. 1223], which went effective on November 19, 2024 (the “Effective Date”).

5. The Plan provided that the initial deadline for Reorganized Holdings to bring claims objections was 180 days after the Effective Date (*i.e.*, May 18, 2025), subject to further extensions. *See* Plan § 1.31.

6. On May 5, 2025, the Court extended the time for Holdings to object to claims to November 18, 2025, subject to further extensions. *See* Docket No. 1639.

RELIEF REQUESTED

7. Holdings requests entry of the Proposed Order further extending the time established by the Plan for Holdings to file and serve objections by six months to May 18, 2026, subject to further extensions.

BASIS FOR RELIEF

8. Section 105(a) of the Bankruptcy Code allows the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [title 11].” 11 U.S.C. § 105(a).

9. Section 1.31 of the Plan establishes the deadline by which Holdings may object to claims (defined in the Plan as the “Claims Objection Deadline”) as the latest of: “(a) ***180 days after the Effective Date, subject to extension by order of the Bankruptcy Court***; (b) 90 days

after the filing of a Proof of Claim or request for payment of Administrative Claims for such Claim; and (c) such other objection deadline as may be specifically fixed by this Plan, the Confirmation Order, the Bankruptcy Rules, or a Final Order.” Plan § 1.31 (emphasis added). The Plan expressly provides that the Court may extend the Claims Objection Deadline “upon motion by Reorganized Holdings.” *See id.* § 7.2(b).³

10. By this Motion, Holdings further requests additional time to review and evaluate the remaining unresolved claims to determine whether objections are warranted and, where appropriate, whether such claims may be resolved through alternative means, including voluntary withdrawal or consensual resolution. The extension will afford Holdings and its professionals an opportunity to make more fully informed decisions concerning the most efficient and cost-effective approach to resolving the remaining claims, consistent with Holdings’ fiduciary duty to preserve and maximize value for legitimate creditors.

11. Since the Effective Date, Holdings has made initial distributions to the holders of allowed claims in accordance with the Plan, subject to an appropriate reserve for unresolved claims. Following Holdings’ recent consensual resolution of Aegean Baltic Bank S.A.’s claim [see Docket No. 1808], only three claims remain unresolved. *See* Proof of Claim Nos. 16, 21,

22. Holdings requires additional documentation for certain of these claims and has commenced discussions with counsel to these creditors in an effort to facilitate their consensual resolution.

12. Therefore, consistent with its rights to do so under the Plan, Holdings seeks an extension of the Claims Objection Deadline to ensure sufficient time to thoroughly and accurately review, reconcile, and, if necessary, object to the remaining claims in accordance with

³ The Plan defines “Reorganized Holdings” as “reorganized Eletson Holdings from and after the Effective Date.” *Id.* § 1.126.

the Plan. Such an extension will ensure that all creditors (including those who have received an initial distribution which was subject to a reserve) are treated appropriately.

13. The requested six-month extension is consistent with similar relief commonly granted in this District. *See, e.g., In re Acorda Therapeutics, Inc.*, Case No. 24-22284 (DSJ) (Bankr. S.D.N.Y. Jan. 31, 2025) [Docket No. 524] (extending deadline to object to claims by six months); *In re A.B.C. Carpet Co., Inc.*, Case No. 21-11591 (DSJ) (Bankr. S.D.N.Y. Sept. 23, 2022) [Docket No. 453] (same); *In re JCK Legacy Company*, Case No. 20-10418 (MEW) (Bankr. S.D.N.Y. Aug. 16, 2021) [Docket No. 1234] (same); *In re Centric Brands, LLC*, Case No. 20-22637 (SHL) (Bankr. S.D.N.Y. Mar. 30, 2021) [Docket No. 849] (same).

NOTICE

14. Notice of this Motion will be provided to all parties entitled to receive notice pursuant to Bankruptcy Rule 2002. Holdings submits that no other or further notice is required.

[Remainder of page left blank intentionally]

CONCLUSION

For the foregoing reasons, Holdings respectfully requests that the Court (a) enter the Proposed Order, substantially in the form attached as **Exhibit A**, and (b) grant such other and further relief as may be just and proper.

DATED: October 14, 2025
New York, New York

HERBERT SMITH FREEHILLS KRAMER
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Counsel for Eletson Holdings Inc.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
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ELETSON HOLDINGS INC., ¹	: Case No. 23-10322 (JPM)
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Debtor.	:
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**ORDER EXTENDING TIME FOR
ELETSON HOLDINGS INC. TO OBJECT TO CLAIMS**

Upon the motion (the “Motion”)² of Eletson Holdings Inc. (“Holdings”) for entry of an order (this “Order”) extending the deadline established under the Plan for Holdings to object to claims by six months from November 18, 2025 to May 18, 2026, subject to further extensions; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and good and sufficient notice of the Motion having been given and no other or further notice of the Motion being necessary; and the Court having reviewed the Motion and heard the statements of counsel at a hearing on the Motion, if any (the “Hearing”); and the Court having determined that the relief requested in the Motion is in the best interests of Holdings, its estate, its creditors, and other parties in interest; and no objections to the relief requested in the Motion having been filed; and after due deliberation and good and sufficient cause appearing therefor,

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 used herein but not otherwise defined shall have the meanings ascribed to them in the Motion.

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The deadline for Holdings to file and serve objections to claims pursuant to the Plan is extended to May 18, 2026.
3. Holdings' rights are reserved to seek further extensions of time to object to claims.
4. This Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025
New York, New York

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE