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November 12, 2025

Hon. John P. Mastando, U.S.B.J.
U.S. Bankruptcy Court for the S.D.N.Y.
JPM.chambers@nysb.uscourts.gov

Re: *In re Eletson Holdings, Inc., et al.*, No. 23-10322 (JPM)

Dear Judge Mastando:

Pursuant to Your Chambers' Rules and Local Rule 7037-1, Rolnick Kramer Sadighi LLP ("RKS") writes on its own behalf and that of its clients, Lassia Investment Company, Glafkos Trust Company, Family Unit Trust Company, and Elafonissos Shipping Corporation (the "Foreign Shareholders" or "FS"), to request a conference regarding the Restraining Notices with Information Subpoenas (the "Subpoenas") reorganized Eletson Holdings Inc. ("REH") has served on RKS and Reed Smith LLP (the "Firms").¹ RKS and the FS respectfully request leave to file a motion to quash, and for a partial protective order against the Subpoenas under CPLR 2304, 5224, and 5240 and Fed. R. Bankr. P. 7026, 7069, and 9016.

In October 2025, REH served the Firms with the Subpoenas, which relate to the September 22, 2025 judgment (Dkt. 1836, "Judgment"). (Exs. A at 4; Ex. B at 4.) Both Firms obviously have received information while representing (and keeping the confidences of) their clients. RKS and REH met and conferred about the Subpoenas on November 12, 2025. Since they did not reach an agreement, RKS and the FS seek the above-described relief. There are multiple grounds to quash.

First, the Subpoenas are invalid. The subpoena issuer must certify that the subpoena:

COMPLIES WITH [CPLR 5524] **AND [§] 601 OF THE GENERAL BUSINESS LAW** THAT I HAVE A REASONABLE BELIEF THAT THE [RECIPIENT] HAS IN THEIR POSSESSION INFORMATION **ABOUT THE DEBTOR** THAT WILL ASSIST THE CREDITOR IN COLLECTING THE JUDGMENT.

CPLR 5224(a)(3)(i) (emphasis added). The language is specific, fixed, in all capitals, and accompanied by the mandate that "**any** information subpoena . . . **shall** contain" it, with no suggestion that alternatives suffice. *Id* (emphasis added).² Yet both Subpoenas omit that language, which REH rewrote to instead certify compliance with just CPLR 5224—**not GBL 601**—and the issuer's "reasonable belief that" the recipient "has information about **one or more of the Judgment Debtors**." (Ex. A at 3 (emphasis added); Ex. B at 3.) Failing to include the specific certification the rule expressly requires, the Subpoenas are "null and void." CPLR 5224(a)(3)(ii)).

¹ Attached hereto as Exhibits A and B, respectively, are the Subpoenas to RKS and Reed Smith LLP.

² Cf., e.g., *LR Credit 21, LLC v. Burnett*, 967 N.Y.S.2d 916, 918 (Civ. 2013) (requiring "strict, literal compliance" with post-judgment process introduced with "shall" in CPLR 5222-a); *Woloszuk v. Logan-Young*, 234 N.Y.S.3d 365, 367 (4th Dep't 2025) (reading CPLR 3216(b)'s "shall" directives to require "strict compliance"); *Goldstone v. Gracie Terrace Apt. Corp.*, 938 N.Y.S.2d 227 (Sup. 2011) ("strictly enforce").



The Subpoenas do not even comply with the purpose of the rule. The certification exists to ensure information subpoenas are directed only to those “reasonabl[y] belie[ved]” to have relevant information “about the debtor.” CPLR 5224(a)(3)(i)). REH averred something else, dodging the safeguard, as it lacked that belief: at bare minimum, REH knows RKS has *no* affiliation with most of the 14 debtors the Subpoenas target. Therefore, the Court should reject REH’s maneuver as violating CPLR 5224 in letter and spirit. *See Ayyash v. Koleilat*, 957 N.Y.S.2d 574, 581, 583 (Sup. Ct. 2012) (rejecting subpoenas with certifications where the issuer’s “reasonable belief” “may have been less than adequate”), *aff’d*, 981 N.Y.S.2d 536 (1st Dep’t 2014).

Second, the RKS Subpoena seeks to severely impair RKS’s ability to represent the FS—including in the appeal of the *very judgment* the Subpoena purports to enforce. Requiring RKS to disclose client information, learned while representing that client, would both create a fundamental conflict of interest “inject[ing] uncertainty into the whole course of [the] representation” and vitiate the “policy that the lawyer may not reveal the confidences of her client,” even though CPLR 5224’s words do not “overcome” that policy. *Astraea NYC LLC v. Rivada Networks, Inc.*, 592 F. Supp. 3d 181, 183 (S.D.N.Y. 2022). Moreover, these effects are gratuitous and avoidable. REH did not need to target counsel via the Subpoenas. REH can target counterparties to the Foreign Shareholders’ business deals, which after years of litigation, are already known to REH. Still, right after RKS appealed the Judgment on October 6, 2025 (Dkt. 1849), and as it was appealing an order underlying the Judgment on October 21 (25-cv-2897 (S.D.N.Y.), Dkt. 18), REH rushed to serve RKS. The timing strongly suggests REH’s plan was to reduce the likelihood of appellate review and introduce uncertainty into the attorney-client relationship. *Cf. Trump v. Vance*, 480 F. Supp. 3d 460, 483 (S.D.N.Y.) (subpoena’s timing may “shed light on an improper purpose”), *aff’d*, 977 F.3d 198 (2d Cir. 2020). So too does REH’s history of using procedural ploys to deny opponents meaningful appellate review of orders in its favor. (*See* 24-cv-8672 (S.D.N.Y.), Dkt. 9, 31) (stipulations of dismissal REH claimed to execute as *the appellant*, over the objection of the appeal’s filer.) The Court should not permit this abuse and “ill-conceived inquiry” into the attorney-client relationship. *Astraea*, 592 F. Supp. 3d 181 at 183.

Third, the Subpoenas seek to undermine multiple active appeals. The Judgment itself is on appeal, as are other sanctions orders and whether the Court had personal jurisdiction over Elafonissos (No. 25-cv-6182 (S.D.N.Y.), Dkt. 1-2 at 33:9-17). Appellants have a right to present their arguments to supervising courts. The arguments should be judged on their merits, free from “action[s],” like the Subpoenas, “which interfere[] with the appeal process.” *See Zaks v. Mosdos Chofetz Chaim, Inc.*, 2022 WL 4783215, at *7 (S.D.N.Y. Oct. 3, 2022) (quotation omitted).

Fourth, the Subpoenas are overbroad and overly burdensome and seek privileged information, though discovery is confined to “nonprivileged matter.” Fed. R. Civ. P. 26(b)(1). Even what would otherwise appear to be noncontroversial information can raise privilege issues when, as here, jurisdiction itself is subject to ongoing litigation (No. 25-cv-6182 (S.D.N.Y.), Dkt. 1-2 at 33:9-17 (discussing Elafonissos’s “minimum contacts” with the forum in a ruling now on appeal).

While the threshold defects above warrant quashing the Subpoenas, the Court has discretion to narrow them instead.

Respectfully submitted,

/s/ Justin Harris

Justin B. Harris

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ELETSON HOLDINGS INC.,¹

Debtors.

Case No. 23-10322 (JPM)

**RESTRAINING NOTICE
WITH INFORMATION SUBPOENA**

RE: JUDGMENT DEBTORS:

**Family Unity Trust Company \$873,000
Glafkos Trust Company \$873,000
Lassia Investment Company \$873,000
Vasilis Hadjieleftheriadis a/k/a Vassilis Chatzieleftheriadis \$873,000
Konstantinos Chatzieleftheriadis \$873,000
Ionannis Zilakos \$873,000
Niki Zilakos \$873,000
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Panos Paxinoz \$873,000
Emmanuel Andreulaks \$873,000
Elafonissos Shipping Corporation \$860,000
Keros Shipping Corporation \$860,000
Laskarina Karastamati \$150,000**

**THE PRESIDENT OF THE UNITED STATES OF AMERICA
THE PEOPLE OF THE STATE OF NEW YORK**

**TO: ROLNICK KRAMER SADIGHI LLP,
GARNISHEE:**

**By Certified Mail / Personal Delivery
ROLNICK KRAMER SADIGHI LLP
PENN 1, Suite 3401
One Pennsylvania Plaza
New York, New York 10119
lrolnick@rksllp.com**

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.

GREETING:

WHEREAS, in the above-captioned bankruptcy case, a Judgment was entered on September 22, 2025, in the U.S. Bankruptcy Court for the Southern District of New York in favor of the Debtor, Eletson Holdings Inc. (the “Judgment Creditor”), and against above-listed judgment debtors (the “Judgment Debtors”) in the amounts set forth above, which amounts remain due, plus post-judgment interest from September 22, 2025. Bankr. Dkt. No. 1836.

WHEREAS, it appears that ROLNICK KRAMER SADIGHI LLP and/or any of its partners, or any affiliates of any of them (collectively, “ROLNICK,” the “Firm,” or “you”) owe or may owe a debt to one or more of the Judgment Debtors or are in possession or in custody of property in which the Judgment Debtors have an interest:

Any and all funds or assets belonging to the Judgment Debtors, including but not limited to, any escrow or credit payments, funds, or assets of any kind retained by you for legal services rendered or to be rendered by you to the Judgment Debtors or any of their affiliates. or for any other reason.

TAKE NOTICE THAT pursuant to subdivision (b) of § 5222 of the (New York) Civil Practice Law and Rules, which is set forth herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of such debt, except as therein provided,

TAKE FURTHER NOTICE that this notice also covers all property in which the Judgment Debtors have an interest hereafter coming into your possession or custody, and debts hereafter coming due from you to the Judgment Debtors.

(NEW YORK) CIVIL PRACTICE LAW AND RULES

Section 5222(b)—Effect of restraint: prohibition of transfer; duration. A Judgment Debtor served with a restraining notice is forbidden to make or suffer any sale, assignment, transfer or interference with any property in which he has an interest, except upon direction of the sheriff [United States Marshal]² or pursuant to an order of the court, until the judgment is satisfied or vacated. A restraining notice served upon a person other than the Judgment Debtor is effective only if, at the time of service, he owes a debt to the Judgment Debtor or he is in possession or custody of property in which he knows or has reason to believe the Judgment Debtor has an interest, or if the Judgment Creditor has stated in the notice that a specified debt is owed by the person served to the Judgment Debtor or that the Judgment Debtor has an interest in specified property in the possession or custody of the person served. All property in which the Judgment Debtor is known or believed to have an interest then in and thereafter coming into possession or custody of such a person, including any specified in the notice, and all debts of such a person, including any specified in the notice, then due and thereafter coming due to the Judgment Debtor, shall be subject to the notice. Such a person is forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property, or pay over or otherwise dispose of any

² Because the Judgment in this action was rendered by a federal court, the U.S. Marshal may serve the enforcement functions ascribed to the sheriff in this Notice.

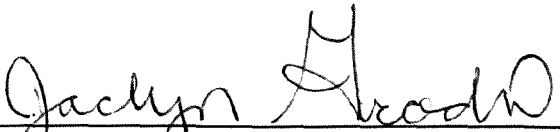
such debt, to any person other than the sheriff [U.S. Marshal], except upon the sheriff [U.S. Marshal] or pursuant to an order of the court, until the expiration of one year after the notice is served upon him, or until the judgment is satisfied or vacated, whichever event first occurs. A Judgment Creditor who has specified personal property or debt in a restraining notice shall be liable to the owner of the property or the person to whom the debt is owed, if other than the Judgment Debtor, for any damages sustained by reason of the restraint. If a Garnishee served with a restraining notice withholds the payment of money belonging or owed to the Judgment Debtor in an amount equal to twice the amount due on the Judgment, the restraining notice is not effective as to other property or money.

FURTHER, WE COMMAND YOU to answer in writing under oath, separately and fully, each question in the Questionnaire accompanying this Subpoena, each answer referring to the question to which it responds; and return the answers together with the original of the questions within seven (7) days after your receipt of the questions and this Subpoena.

TAKE FURTHER NOTICE THAT DISOBEDIENCE OF THIS RESTRAINING NOTICE OR FALSE SWEARING OR FAILURE TO COMPLY WITH THIS SUBPOENA MAY SUBJECT YOU TO FINE AND IMPRISONMENT, PUNISHMENT FOR PERJURY, AND/OR CONTEMPT OF COURT.

I hereby certify that this Information Subpoena complies with Rule 5224 of the (New York) Civil Practice Law and Rules and that the undersigned have a reasonable belief that the party receiving this Subpoena has in their possession information about one or more of the Judgment Debtors that will assist the Judgment Creditor in collecting the Judgment.

Dated: October 20, 2025


Jaclyn Grodin
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, New York 10022
jgrodin@goulstonstorrs.com
Tel: (212) 878-5065

*Attorneys for Judgment Creditor
Eletson Holdings Inc.*

DIRECT ALL INQUIRIES AND RESPONSES TO THE ABOVE.

This communication is from a debt collector.
It is an attempt to collect a debt and any information obtained will be used for that purpose.

**THE FOLLOWING DEMANDS RELATE TO THE PERIOD FROM
MARCH 7, 2023 TO THE DATE HEREOF
(AND CONTINUING UNTIL SATISFACTION OF THE JUDGMENT IN FULL)**

QUESTIONNAIRE

Answer the following Questions based on any information known to you and any information reflected in your records or files, whether or not verified or confirmed by you:

1. For any account in which you hold or have ever held any funds or assets belonging to the Judgment Debtors or any of their affiliates, and expected to be returned or transferred upon the occurrence or fulfillment of any condition, including, without limitation, funds or assets received by you as a deposit, retainer, or in escrow for services rendered, or in connection with a transaction for which you represented a Judgment Debtor:
 - a. Provide the INSTITUTION, NAME ON THE ACCOUNT, BRANCH, ADDRESS, and ACCOUNT NUMBER, the date the account was opened, and the amount of funds or cash value and description of assets escrowed or deposited in each account; and
 - b. State whether the account is currently open or closed. If open, provide the current balance and anticipated date of transfer or return of the deposited or escrowed funds or assets. If closed, provide the date of closing and identify the party, institutions, and account numbers to which escrowed or deposited funds or assets were transferred.
 - c. Identify and set forth the amount or value of any other funds or assets belonging to the Judgment Debtor and currently in your possession.
2. Set forth every institution and/or account from which you have ever received funds from any Judgment Debtor, as compensation or consideration for services rendered by you or in connection with any transaction of any kind. For each payment or deposit of funds received from a Judgment Debtor, provide:
 - a. The NAME of any individual associated with the payment or deposit, and the ACCOUNT NUMBER and ROUTING NUMBER of any accounts associated with the payment or deposit.
 - b. The INSTITUTION, BRANCH, and ADDRESS at which the account was held.
 - c. The DATE and DOLLAR AMOUNT of any such payment or deposit, or if the payment or deposit was made in a form other than cash, the cash value of and form in which the payment or deposit was made (if securities, state the issuer and type of securities).
3. Identify any and all offshore or international businesses, entities, institutions and accounts (including, without limitation, any so-called "international business companies") that you

know to be owned, directly or indirectly, by any Judgment Debtor, or otherwise affiliated or associated with a Judgment Debtor. For each:

- a. State whether you are aware of any transfers from the Judgment Debtor.
 - b. If so, provide the date of all such transfers, and the amount of funds or identify and provide the cash value of any assets transferred.
4. Set forth the person or persons within the Firm most familiar with the Judgment Debtors' (or any Judgment Debtor' assets, business affiliations, and accounts).
 5. Please have the person(s) identified in response to Question No. 4 review and supplement your answers to all of these Questions; it goes to the essence of integrity of the answers provided by you that your answers accurately reflect and present a true and accurate picture of the information the Questions seek.
 6. Set forth the most recent home and business addresses and the most recent phone number and email address your records indicate for each Judgment Debtor. Identify the date on which you most recently communicated or contacted the Judgment Debtor by phone, email and/or mail.
 7. State whether you are in possession or are aware of any deposits or escrowed assets expected to become due or be returned to any Judgment Debtor not otherwise described in your responses to these Questions and identify when and the amount that such payments are expected to be paid or returned.
 8. Set forth any passport numbers or drivers licenses, along with respective countries or states, dates of issuance, and expiration dates, which you have on file for any Judgment Debtor.
 9. Identify any and all accounts, securities, or other assets owned, held by, or owing to any Judgment Debtor not otherwise accounted for in your responses.

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

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Debtors.

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TO: REED SMITH LLP, *GARNISHEE*:

By Certified Mail / Personal Delivery
REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
lsolomon@reedsmith.com

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WHEREAS, it appears that REED SMITH LLP and/or any of its partners, or any affiliates of any of them (collectively, “REED SMITH,” the “Firm,” or “you”) owe or may owe a debt to one or more of the Judgment Debtors or are in possession or in custody of property in which the Judgment Debtors have an interest:

Any and all funds or assets belonging to the Judgment Debtors, including but not limited to, any escrow or credit payments, funds, or assets of any kind retained by you for legal services rendered or to be rendered by you to the Judgment Debtors or any of their affiliates. or for any other reason.

TAKE NOTICE THAT pursuant to subdivision (b) of § 5222 of the (New York) Civil Practice Law and Rules, which is set forth herein, you are hereby forbidden to make or suffer any sale, assignment or transfer of, or any interference with, any such property or pay over or otherwise dispose of such debt, except as therein provided,

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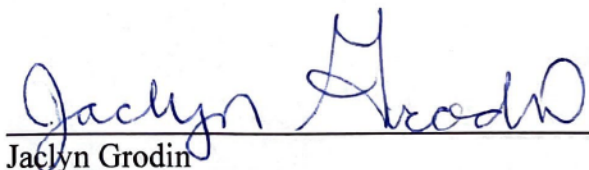
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Dated: October 20, 2025



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 - a. Provide the INSTITUTION, NAME ON THE ACCOUNT, BRANCH, ADDRESS, and ACCOUNT NUMBER, the date the account was opened, and the amount of funds or cash value and description of assets escrowed or deposited in each account; and
 - b. State whether the account is currently open or closed. If open, provide the current balance and anticipated date of transfer or return of the deposited or escrowed funds or assets. If closed, provide the date of closing and identify the party, institutions, and account numbers to which escrowed or deposited funds or assets were transferred.
 - c. Identify and set forth the amount or value of any other funds or assets belonging to the Judgment Debtor and currently in your possession.
2. Set forth every institution and/or account from which you have ever received funds from any Judgment Debtor, as compensation or consideration for services rendered by you or in connection with any transaction of any kind. For each payment or deposit of funds received from a Judgment Debtor, provide:
 - a. The NAME of any individual associated with the payment or deposit, and the ACCOUNT NUMBER and ROUTING NUMBER of any accounts associated with the payment or deposit.
 - b. The INSTITUTION, BRANCH, and ADDRESS at which the account was held.
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