



HERBERT SMITH
FREEHILLS
KRAMER

By Kyle J. Ortiz

Kyle J. Ortiz

Partner

+1 212 715 9132

+1 212 715 8000

kyle.ortiz@hsfkramer.com

1177 Avenue of the Americas

New York, NY 10036

T 212.715.9100

F 212.715.8000

November 17, 2025

VIA ECF AND EMAIL

The Honorable John P. Mastando III
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

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

Dear Judge Mastando,

We write on behalf of Eletson Holdings Inc. (“Holdings”). Per the request of chambers, Holdings has reviewed numerous pending motions to seal which had not yet been ruled on to determine whether such motions could be withdrawn. Holdings also conferred with counsel to the Official Committee of Unsecured Creditors (the “Committee”) with respect to certain of those motions that were filed by the Committee.

The motions to seal included on **Exhibit A** are hereby withdrawn.

Respectfully submitted,

/s/ Kyle Ortiz

Kyle J. Ortiz
Partner



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EXHIBIT A

Date Filed	Docket No.	Caption
4/14/2023	45	Alleged Debtors' Motion for an Order Authorizing the Filing Under Seal of Certain Documents Relating to their Pending Motions filed by Eletson Holdings Inc., Agathonissos Finance LLC, and Eletson Finance (US) LLC
5/30/2023	72	Alleged Debtors' Motion for an Order Authorizing the Filing Under Seal of their Supplement to the Motion to Dismiss filed by Eletson Holdings Inc., Agathonissos Finance LLC, and Eletson Finance (US) LLC
6/16/2023	88	Alleged Debtors' Motion for an Order Authorizing the Filing Under Seal of the Alleged Debtors' List of Claimed or Purported Creditors filed by Eletson Holdings Inc., Agathonissos Finance LLC, and Eletson Finance (US) LLC
7/18/2023	131	Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Information Contained in their Objection to the Debtors' Motion to Dismiss and Related Pleadings
7/18/2023	133	Motion of Wilmington Savings Fund Society, FSB, as Indenture Trustee, for the Entry of an Order Authorizing the Filing Under Seal of Certain Information Contained in the Objection to the Debtors' Motion to Dismiss and Related Pleadings
7/25/2023	141	Motion of New Agathonissos Finance LLC for Entry of an Order Authorizing the Filing Under Seal of Certain Information Contained in its Objection to the Debtors' Motion to Dismiss
8/16/2023	164	Alleged Debtors' Motion for an Order Authorizing the Filing Under Seal of Certain Documents Related to the Reply in Support of the Alleged Debtors' Motion to Dismiss the Chapter 7 Involuntary Petitions filed by Pach Shemen LLC, VR Global Partners, L.P., and Alpine Partners
8/23/2023	169	Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Surreply in Opposition to the Debtors Motion to Dismiss
8/23/2023	180	<i>Motion of Wilmington Savings Fund Society, FSB, as Indenture Trustee, for the Entry of an Order Authorizing the Filing Under Seal of Certain Information Contained in the Trustee's Sur-Reply in Further Support of Its Objection to the Debtors' Motion to Dismiss the Chapter 7 Petitions</i> filed by Stephen Zide on behalf of Wilmington Savings Fund Society, FSB, solely in its capacity as trustee and collateral agent under that certain indenture dated as of July 2, 2018.
9/5/2023	188	<i>Motion of Wilmington Savings Fund Society, FSB, as Indenture Trustee, for the Entry of an Order Authorizing the Filing Under Seal of Certain Information Contained in the Supplemental Declaration of Patrick J. Healy</i> filed by Stephen Zide on behalf of Wilmington Savings Fund Society, FSB, solely in its capacity as trustee and collateral agent under that certain indenture dated as of July 2, 2018.

Date Filed	Docket No.	Caption
9/5/2023	194	Alleged Debtors' Motion for an Order Authorizing the Filing Under Seal of the: (I) Motion in Limine to Strike the Surreply Filed by Wilmington Savings Fund Society, FSB, as Trustee; (II) Alleged Debtors' Motion In Limine to Accord the Arbitration Award Preclusive Effect or in the Alternative for a Stay; and (III) Exhibits Incorporated Thereon
9/15/2023	205	Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Submissions
10/27/2023	240	Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Certain Information Contained in the Motion of the Official Committee of Unsecured Creditors to Modify the Court's Prior Order Granting Relief from the Automatic Stay
11/01/2023	250	Debtors' Motion for an Order Authorizing the Filing Under Seal of Exhibits A and C to Debtors' Opposition to the Motion to Modify Protective Order
11/27/2023	288	Debtors' Motion for an Order Authorizing the Filing Under Seal of Certain Documents Related to the Debtors' Statement Regarding Actionable Deficiencies and Known Inaccuracies in the Application of the Unofficial Committee of Unsecured Creditors for an Order Authorizing the Employment and Retention of Dechert LLP as Counsel and Request for Further Disclosures
11/27/2023	292	Debtors' Motion for an Order Authorizing the Filing Under Seal of Exhibits 1, 6, and 7 to the Declaration of Vassilis Kertsikoff in Support of the Debtors' Motion to Enforce Three Orders Protecting Debtors – The Automatic Stay, Stipulated Stay Relief Order, and Status Quo Injunction – and For Sanctions Against Levona Holdings Ltd.
12/1/2023	305	Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of its Reply in Further Support of its Application for an Order Authorizing the Employment and Retention of Dechert LLP as Counsel, Effective as of October 25, 2023
12/27/2023	336	Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of its Ex Parte Application for an Order Pursuant to Bankruptcy Rule 2004
1/29/2024	383	<i>The Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Motion of the Petitioning Creditors to Terminate the Debtors' Exclusivity Period (Attachment: Ex. A: Proposed Order)</i> filed by Jared C Borriello on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In

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		His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.. (Attachments: # 1 Exhibit A: Proposed Order) (Borriello, Jared) (Entered: 01/29/2024)
2/29/2024	445	Motion to File Under Seal <i>Certain Invoices to First Interim Fee Application of Reed Smith LLP, Counsel to the Debtors and Debtors in Possession, for Compensation and Reimbursement of Expenses for the Period September 25, 2023 To December 31, 2023</i> (related document(s)444) filed by Derek J Baker on behalf of Eletson Holdings Inc.
3/12/2024	475	<i>The Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Joinder in Support of Motions for an Order Appointing Chapter 11 Trustee (Attachment: Ex. A: Proposed Order)</i> (related document(s)468, 37) filed by Jared C Borriello on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.
3/14/2024	488	<i>Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its Objection of the Official Committee of Unsecured Creditors to the First Interim Fee Application of Reed Smith LLP, Counsel to the Debtors and Debtors In Possession, for Compensation and Reimbursement of Expenses for the Period September 25, 2023 to December 31, 2023</i> (related document(s)487) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
3/18/2024	493	Motion to File Under Seal <i>a Freezing Order Granted in Favor of Debtors in a Court of the British Virgin Islands</i> filed by Louis M. Solomon on behalf of Eletson Holdings Inc
3/22/2024	523	Motion to File Under Seal <i>Exhibits to the Omnibus Objection and Witness Declarations</i> (related document(s)519, 516, 514, 517, 520) filed by Louis M. Solomon on behalf of Eletson Holdings Inc.
3/22/2024	525	<i>Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of the Witness Declaration of Michael Cordasco in Support of the Motion of the Official Committee of Unsecured Creditors for an Order Appointing a Chapter 11 Trustee</i> (related document(s)524) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
3/28/2024	538	Motion to File Under Seal <i>Certain Invoices to First Monthly Fee Statement of Reed Smith LLP for Allowance of Compensation for</i>

Date Filed	Docket No.	Caption
		<i>Services Rendered and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession, for the Period From January 1, 2024 Through January 31, 2024</i> (related document(s)537) filed by Derek J Baker on behalf of Eletson Holdings Inc.
4/01/2024	542	<i>Motion to File Under Seal Certain Invoices to Second Monthly Fee Statement of Reed Smith LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession, for the Period From February 1, 2024 Through February 29, 2024</i> (related document(s)541) filed by Derek J Baker on behalf of Eletson Holdings Inc.
4/2/2024	546	<i>The Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Reply in Support of Motions for Entry of an Order Appointing a Chapter 11 Trustee (Attachment: Ex. A: Proposed Order)</i> filed by Jared C Borriello on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.
4/8/2024	567	<i>The Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Omnibus Motion In Limine to Exclude Evidence Filed in Support of the Debtors' Trustee Motion Objections (Attachment: Ex. A: Proposed Order)</i> filed by Kyle J. Ortiz on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.
4/12/2024	584	<i>Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its Omnibus Reply in Support of Dechert LLP's First and Second Monthly Fee Statements for Allowance of Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Periods from October 25, 2023 Through December 31, 2023</i> (related document(s)583) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
5/10/2024	661	<i>Motion to File Under Seal / Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its Objection to the Third Monthly Fee Statement of Reed Smith LLP for Allowance of Compensation as Counsel to the</i>

Date Filed	Docket No.	Caption
		<i>Debtors and Debtors in Possession for the Period From March 1, 2024 Through March 31, 2024</i> (related document(s)660) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
5/31/2024	732	<i>Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its Objection to the Fourth Monthly Fee Statement of Reed Smith LLP as Counsel to the Debtors and Debtors in Possession for the Period From April 1, 2024 Through April 30, 2024</i> (related document(s)731) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
6/7/2024	752	<i>Motion to File Under Seal (Levona Holdings Ltd.'s Motion for an Order Authoring the Filing Under Seal Temporarily of Certain Portions of Levona's Memorandum in further Support of Motion to Compel Discovery)</i> filed by Isaac Nesser on behalf of Levona Holdings Ltd.
6/13/2024	778	<i>Motion to File Under Seal Certain Invoices to Second Interim Fee Application of Reed Smith LLP, Counsel to the Debtors and Debtors in Possession, for Compensation and Reimbursement of Expenses for the Period January 1, 2024 Through April 30, 2024</i> (related document(s)776) filed by Derek J Baker on behalf of Eletson Holdings Inc.
7/3/2024	829	<i>Motion to File Under Seal Exhibits to Debtors Motion to Compel Documents from Wilmington Savings Fund Society, FSB</i> (related document(s)828) filed by Louis M. Solomon on behalf of Eletson Holdings Inc.
7/12/2024	863	<i>Motion to File Under Seal Exhibits to Debtors' Letter to the Honorable Judge John P. Mastando in Response to the Committee of Unsecured Creditor's Letter</i> (related document(s)862) filed by Louis M. Solomon on behalf of Eletson Holdings Inc.
7/17/2024	879	<i>Motion to File Under Seal / Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its July 17, 2024 Letter to the Court</i> (related document(s)878) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
7/22/2024	884	<i>Motion to File Under Seal / Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of Its Reply in Support of Second Interim Fee Application of Dechert LLP as Counsel to the Committee, for Compensation and Reimbursement of Expenses for the Period From January 1, 2024 Through April 30, 2024</i> (related document(s)882) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
8/19/2024	971	<i>Motion to File Under Seal</i> (related document(s)970) filed by David A. Herman on behalf of Official Committee of Unsecured Creditors.
8/20/2024	977	<i>Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' Objection</i>

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		<i>to the Debtors' Application to Retain Riveron, RTS LLC (Attachment: Ex. A: Proposed Order)</i> (related document(s)37) filed by Bryan Kotliar on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.
8/20/2024	981	Motion to File Under Seal of <i>Excerpts of and Exhibits to Debtors' Replies in Further Support of Objection to Claims of Wilmington Savings Fund Society, FSB And Petitioning Creditors</i> filed by Louis M. Solomon on behalf of Eletson Holdings Inc.
8/22/2024	1005	Motion to File Under Seal (related document(s)1004) filed by David A. Herman on behalf of Official Committee of Unsecured Creditors.
8/22/2024	1007	Motion to File Under Seal <i>Debtors' Letter to the Honorable Judge John P. Mastando in Response to the Committee of Unsecured Creditor's Letter</i> filed by Louis M. Solomon on behalf of Eletson Holdings Inc.
8/23/2024	1016	<i>Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Petitioning Creditors' August 23, 2024 Letter (Attachment: Ex. A: Proposed Order)</i> (related document(s)37) filed by Jared C Borriello on behalf of ALPINE PARTNERS (BVI), L.P., Gene B. Goldstein, Gene B. Goldstein, In His Capacity as Trustee of the Gene B. Goldstein and Francine T. Goldstein Family Trust, Jason Chamness, Mark Millet, In His Capacity as Trustee of the Mark E. Millet Living Trust, Mark Millet, In His Capacity as Trustee of the Millet 2016 Irrevocable Trust, Pach Shemen LLC, Robert H. Latter, Ron Pike, Tracy Lee Gustafson, VR Global Partners, L.P.
8/27/2024	1034	Motion to File Under Seal (related document(s)1030, 1032) filed by Stephen Zide on behalf of Official Committee of Unsecured Creditors.
9/5/2024	1060	Debtors' Motion for an Order Authorizing the Filing Under Seal of Debtors' Memorandum of law in Support of Confirmation and Responses to Objections to Confirmation filed by Louis M. Solomon
9/5/2024	1065	Petitioning Creditors' Motion for an Order Authorizing the Filing Under Seal of Certain Portions of the Rebuttal Report
9/20/2024	1138	Joint Motion of the Petitioning Creditors and the Official Committee of Unsecured Creditors for an Order Authorizing the Filing Under Seal of Certain Portions of the Post-Trial Brief Regarding Confirmation of the Competing Plans
10/08/2024	1179	Motion of the Petitioning Creditors for an Order Authorizing the Filing Under Seal of Certain Portions of Objections to Azure Entities' Proofs of Claim

Date Filed	Docket No.	Caption
11/4/2024	1225	Motion of the Official Committee of Unsecured Creditors for the Entry of an Order Authorizing the Filing Under Seal of the Statement and reservation of Rights of the Official Committee of Unsecured Creditors to the Stipulation between the Office of the United States Trustee and Reed Smith LLP
2/14/2025	1436	Reed Smith's Motion for an Order Authorizing the Filing Under Seal of Exhibit G of the Solomon Declaration
2/24/2025	1479	Levona Holdings Ltd.'s Motion for an Order Authorizing the Filing Under Seal of Exhibits 1-3 of the Nesser Declaration
4/16/2025	1609	Eletson Holding Inc.'s Motion for an Order Authorizing the Filing Under Seal of Certain Exhibits and Information Relating to Eletson Holdings Inc.'s Motion for Entry of an Order Compelling Reed Smith to Implement the Plan and Imposing Sanctions
8/28/2025	1801	Eletson Holding Inc.'s Motion for an Order Authorizing the Filing Under Seal of Certain Exhibits and Information Relating to Eletson Holding Inc.'s Motion for Extension of the Deadline to File Avoidance Actions Governed by 11 U.S.C. § 546(a)