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

In re:

ELETSON HOLDINGS INC., *et al.*,  
  
Debtors.

Chapter 11

Case No. 23-10322 (JPM)

(Jointly Administered)

**APPELLANTS' STATEMENT OF ISSUES TO BE  
PRESENTED AND DESIGNATION OF ITEMS TO BE INCLUDED  
IN THE RECORD ON APPEAL OF THE SEPTEMBER 22, 2025 JUDGMENT AGAINST  
VASILIS HADJIELEFThERiADIS, PURPORTED PROVISIONAL BOARD, FORMER  
MAJORITY SHAREHOLDERS, FORMER MINORITY SHAREHOLDERS  
AND LASKARINA KARASTAMATI**

In accordance with Federal Rule of Bankruptcy Procedure 8009, Elafonissos Shipping Corporation (“Elafonissos”), Family Unity Trust Company, Glafkos Trust Company, and Lassia Investment Company (the “Majority Shareholders” and, together with Elafonissos, “Appellants”), by and through their undersigned counsel, respectfully submit (1) the following statement of issues to be tried on appeal, (2) the designation of the items to be included in the record on appeal, and (3) the certification regarding transcripts in connection with the Appellant’s *Notice of Appeal* (Dkt.



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No. 1849). As set forth in the Notice of Appeal, Appellant appeals from the United States Bankruptcy Court for the Southern District of New York's September 22, 2025 Judgment against Vasilis Hadjieleftheriadis, Purported Provisional Board, Former Majority Shareholders, Former Minority Shareholders, and Laskarina Karastamati (the "Judgment"), issuing coercive monetary judgments of \$873,000 against each of the Majority Shareholders and \$863,000 against Elafonissos "on account of the sanctioned amounts accrued under the Sanctions Orders through and including July 31, 2025."<sup>1</sup>

**I. Statement of the Issues on Appeal**

1. Whether it was error for the Bankruptcy Court to enter the proposed judgment, which reorganized Eletson Holdings ("Reorganized Holdings") submitted to the Court via email on August 6, 2025 (the "Proposed Judgment"), and issue the Judgment on September 22, 2025.

2. Whether the Bankruptcy Court erred by imposing fixed sanctions for continuing violations of the Court's prior orders throughout the periods specified in the Judgment without receiving or examining any evidence, or making any finding, that Appellants had not complied with the orders during those periods.

3. Whether the Bankruptcy Court erred by entering the Judgment, which implicated issues and underlying orders then and now still on appeal to higher courts, and thereby improperly circumvented or undermined appellate jurisdiction.

4. Whether the Bankruptcy Court, in issuing the Judgment, improperly sanctioned Appellants to coerce them to take actions beyond the scope permitted under section 1142(b) of the Bankruptcy Code.

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<sup>1</sup> Capitalized terms used herein but undefined have the meaning provided in the Judgment.

5. Whether the Bankruptcy Court, in issuing the Judgment, improperly grouped Appellants with other entities or persons it was also sanctioning without due consideration of the different powers and rights of the differing entities or persons, or as to whether Appellants substantially complied with the Bankruptcy Court's prior orders.

6. Whether the Bankruptcy Court had the jurisdiction necessary to issue the Judgment, including with respect to Elafonissos.

7. Whether the Court erred in issuing any of the Sanctions Orders upon which it based the Judgment, or erred in imposing those orders on Appellants.

## **II. Designation of the Record on Appeal**

Appellant respectfully designates the following items to be included in the appellate record under Bankruptcy Rule 8009(a). These items include the August 6, 2025 Proposed Judgment submission, attached hereto as Exhibit 1. Each additional item designated below includes materials filed on the Bankruptcy Court's docket and exhibits admitted into evidence during the hearing on the objection lodged as to the prior January 29, 2025 sanctions order, which formed the basis of the order as set forth in the following tables (collectively, the "Sanctions Exhibits").

### **A. Bankruptcy Court Docket Entries (Case No. 23-10322)**

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
846	7/8/2024	Amended Plan /Notice of Filing of Solicitation Version of Petitioning Creditors' Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
847	7/8/2024	Amended Disclosure Statement /Notice of Filing of Solicitation Version of Disclosure Statement In Support of Petitioning Creditors' Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
851	7/9/2024	Notice of Proposed Order /Notice of Filing of Solicitation Version of Proposed Order (I) Approving (A) The Rights Offering and Related Procedures and Materials and (B) The Backstop Agreement, and (II) Granting Related Relief
913	8/2/2024	Statement /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
1132	9/19/2024	Amended Plan /Notice of Filing of Petitioning Creditors' Revised Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and Its Affiliated Debtors
1134	9/19/2024	Amended Plan Supplement to the Petitioning Creditors' Amended Joint Chapter 11 Plan of Reorganization of Eletson Holdings Inc. and its Affiliated Debtors
1212	10/25/2024	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 Motion in Limine
1223	11/4/2024	Findings of Fact, Conclusions of Law, and Order Confirming Petitioning Creditors' Amended Joint Chapter 11 Plan of Eletson Holdings Inc. and its Affiliated Debtors
1242	11/13/2024	Letter /Letter to the Honorable John P. Mastando III re: Status Conference on November 13, 2024
1254	11/14/2024	Transcript of November 13, 2024 Conference
1255	11/19/2024	Statement /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
1258	11/19/2024	Statement /Notice of (I) The Occurrence of the Effective Date and (II) Final Deadlines for Filing Certain Claims
1268	11/25/2024	Motion for Sanctions /Emergency Motion of Reorganized Eletson 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

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1281	12/3/2024	Affidavit of Service of Ronaldo Lizarraga Angulo re: Documents Served on November 25, 2024
1283	12/3/2024	Supplemental Affidavit of Service of Kyle J. Ortiz re: Docket Nos. 1268, 1277
1285	12/10/2024	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions on Elteson Holdings” (a) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1287	12/10/2024	Opposition / Reed Smith LLP’s Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions
1288	12/10/2024	Declaration of Louis M. Solomon in Support of Reed Smith’s Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions
1289	12/10/2024	Declaration of Betty Lamin-Blamo Pursuant to 28 U.S.C. 1746
1290	12/10/2024	Declaration of Vasilis Hadjieleftheriadis in Support of Reed Smith’s Opposition to Emergency Motion of Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions
1291	12/10/2024	Objection to Motion for Sanction
1299	12/13/2024	Response /Reorganized Holdings’ Omnibus Reply to the Objections to Its Sanctions Motion and Foreign Representative Motion
1300	12/13/2024	Declaration /Declaration of Jared C. Borriello In Support of Reorganized Holdings’ Omnibus Reply to the Objections to its Sanctions Motion and Foreign Representative Motion
1301	12/13/2024	Statement / Statement of the Official Committee of Unsecured Creditors in Support of the Emergency Motion of Reorganized Eletson 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
1313	12/17/2024	Letter to the Honorable Judge John P. Mastando III Regarding Liberian Threats
1317	12/18/2024	Letter to the Honorable Judge John P. Mastando III Regarding Togut Letters

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1326	12/20/2024	Order signed on 12/20/2024 Authorizing Adam Spears to Act as Foreign Representative of Reorganized Holdings and (II) Granting Related Relief
1328	12/23/2024	Letter to the Honorable John P. Mastando III re: Follow-up to December 16, 2024 Status Conference, Appeal Status
1330	12/27/2024	Notice of Proposed Order /Notice of Filing of Revised Proposed Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1333	12/30/2024	Memorandum Endorsed Order signed on 12/30/2024 Re: Letter The Daniolos Law Firm.
1338	12/31/2024	Opposition / Reed Smith LLP's Limited Opposition to Revised Proposed Order Imposing Sanctions on Eletson Holdings' (A) Existing Person of Record and (B) Former Shareholders, Officers, Directors, and Counsel, Including Reed Smith LLP
1339	1/2/2025	Letter /Letter to Honorable John P. Mastando III Re: January 6, 2025 Hearing and Response to Reed Smith's Opposition to the Revised Proposed Order concerning the Sanctions Motion
1343	1/5/2025	Statement /Joint Exhibit List for January 6, 2025 Hearing
1344	12/17/2024	Transcript Regarding Hearing Held on 12/16/2024
1350	1/9/2025	(A) Preliminary Objection To Reed Smith's Fourth Interim And Final Fee Application And (B) Request For Disgorgement Of All Reed Smith's Fees
1353	1/10/2025	Letter /Letter to the Honorable John P. Mastando III re: Motion [Dkt. No. 1268] - post trial briefing issues
1354	1/13/2025	Letter to the Honorable John P. Mastando Regarding Developments in Liberia and in the United States
1355	1/13/2025	Statement /Eletson Holdings Inc's Proposed Findings of Fact and Conclusions of Law Approving Pending Motion for Contempt and Other Relief Against, Inter Alia, Reed Smith, Eletson Holding's Address of Record and Former Shareholders, Officers and Directors

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1356	1/13/2025	Findings of Fact and Conclusions of Law in Support of Opposition to Emergency Motion of "Reorganized Eletson Holdings Inc." for an Order Imposing Sanctions Against Reed Smith LLP
1359	1/14/2025	Motion for Contempt /Reorganized Eletson Holdings Inc.'s Motion for Entry of an Order to Show Cause
1363	1/15/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1353
1364	1/15/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1355
1365	1/15/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1359
1371	1/17/2025	Memorandum of Law /Reorganized Holdings' Post-Trial Brief Concerning the Sanctions Motion
1372	1/17/2025	Reed Smith LLP's Post-Hearing Brief in Opposition to Emergency Motion of "Reorganized Eletson Holdings Inc. for an Order Imposing Sanctions"
1382	1/9/2025	Amended Transcript of Hearing on January 6, 2025
1402	1/29/2025	Order signed on 1/29/2025 In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization.
1404	1/30/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1359
1405	1/28/2025	Amended Transcript Regarding Hearing Held on 1/24/2025
1406	2/4/2025	Affidavit of Service of Order in Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization
1407	2/4/2025	Letter to the Honorable John P. Mastando Regarding Compliance with Order on 1/29/2025
1408	2/4/2025	Affidavit of Service re: Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1416	2/6/2025	Emergency Motion to Compel, Motion for Sanctions /Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1427	2/11/2025	Affidavit of Service of Kyle J. Ortiz re: Docket Nos. 1416, 1417
1428	2/11/2025	Affidavit of Service of Kyle J. Ortiz re: Docket Nos. 1416, 1417, 1420, 1421

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1429	2/11/2025	Affidavit of Service of Kurtzman Carson Consultants re: Docket Nos. 1416, 1417, 1420, 1421
1441	2/17/2025	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1444	2/17/2025	Objection to Motion Objection of the Majority Shareholders of Eletson Holdings Inc. to Emergency Motion for Entry of a Further Order in Support of Confirmation
1445	2/17/2025	Opposition Of Non-Party Rimn P.C. To The Emergency Motion of Eletson Holdings Inc. For Entry of A Further Order In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization
1455	2/19/2025	Response /Eletson Holdings Inc.'s Omnibus Reply to Objections to Emergency Motion of Eletson Holdings Inc for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1459	2/19/2025	Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1468	2/21/2025	Statement /Notice of Filing of Transcript Related to the Court's February 20, 2025 Decision Regarding Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order In Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization [Docket No. 1416]
1469	2/21/2025	Letter to the Honorable John P. Mastando in Connection with the Court's Oral Ruling at the February 20, 2025 Hearing
1471	2/24/2025	Statement Sidley Austin LLP Certification to the Court
1472	2/24/2025	Statement Lassia Investment Company Certification to the Court
1473	2/24/2025	Statement Family Unity Trust Company Certification to the Court
1474	2/24/2025	Statement Glafkos Trust Corporation Certification to the Court



<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1475	2/24/2025	Statement Reed Smith LLP Certification to the Court
1482	2/24/2025	Letter / Email dated 2/24/2025 Filed by John Markianos-Daniolos on behalf of Vasilis Kertsikoff, Vasilis Hadjieleftheriadis, Laskarina Karastamati
1483	2/25/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1485	2/25/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1486	2/26/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1492	2/27/2025	Letter to the Honorable John P. Mastando Regarding February 20, 2025 Order Compliance
1494	2/27/2025	Letter /Letter to the Honorable John P. Mastando III, Re: Response to Reed Smith Letter
1495	2/27/2025	Order Signed on 2/27/2025 In Support Of Confirmation And Consummation Of The Court-Approved Plan Of Reorganization And Imposing Sanctions On Certain Parties.
1499	3/3/2025	Notice of Filing of Revised Proposed Order with Respect to the Emergency Motion of Eletson Holdings inc. For Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1501	3/4/2025	Affidavit of Service of Kyle J. Ortiz re: Docket Nos. 1455, 1457, 1459, 1460, 1461
1503	3/4/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1468
1504	3/4/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1481
1506	3/4/2025	Objection to Motion Objection of the Majority Shareholders of Eletson Holdings Inc. to Emergency Motion for Entry of a Further Order in Support of Confirmation
1507	3/4/2025	Opposition of Non-Party Daniolos Law Firm to the Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1508	3/4/2025	Memorandum of Law in Opposition to the Emergency Motion of Eletson Holdings Inc. "For Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization"
1509	3/4/2025	Declaration of Louis M. Solomon in Support of Reed Smith LLP's Memorandum of Law in Opposition to the Emergency Motion of Eletson Holdings Inc. "For Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization"
1514	3/5/2025	Affidavit of Service of Kyle J. Ortiz re: Docket No. 1494
1522	3/7/2025	Eletson Holdings Inc.'s Omnibus Reply In Support of Its Foreign Opposition Sanctions Motion
1523	3/7/2025	Declaration of Jared C. Borriello, Esq. In Support of Eletson Holdings Inc's Omnibus Reply In Support of Its Foreign Opposition Sanctions Motion
1530	3/12/2025	Affidavit of Service of Kyle J. Ortiz re: Docket Nos. 1497, 1498, 1499
1531	3/12/2025	Affidavit of Service of Kurtzman Carson Consultants re: 1) Eletson Holdings Inc.'s Omnibus Reply to Objections to Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization; 2) Supplemental Declaration of Bryan M. Kotliar, Esq. in Support of Eletson Holdings Inc.'s Omnibus Reply to Objections to Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization; and 3) Notice of Agenda of Matters Scheduled for Hearing on February 20, 2025 at 9:30 a.m. (Docket Nos. 1455, 1461, 1457)

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1532	3/12/2025	Affidavit of Service of Kurtzman Carson Consultants re:1) Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization; 2) Motion to Shorten Notice with Respect to Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization; and 3) Scheduling Order (Docket Nos. 1459, 1470, 1460)
1534	3/12/2025	Affidavit of Service 1) Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization and Imposing Sanctions on Certain Parties; and 2) Notice of Filing of Revised Proposed Order with Respect to the Emergency Motion of Eletson Holdings Inc. for Entry of a Further Order in Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1535	3/12/2025	Affidavit of Service of Kurtzman Carson Consultants re:1) Eletson Holdings Inc.'s Omnibus Reply in Support of its Foreign Opposition Sanctions Motion; and 2) Declaration of Jared C. Borriello, Esq. in Support of Eletson Holdings Inc.'s Omnibus Reply in Support of its Foreign Opposition Sanctions Motion (Docket Nos. 1522, 1523)
1536	3/12/2025	Transcript regarding Hearing held on March 12, 2025
1537	3/13/2025	Order in Further Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1569	3/27/2025	Motion to Reconsider FRCP 60 or FRBP 3008 of Elafonissos Shipping Corporation for Relief From the Court's Orders of January 29, 2025 and March 13, 2025 Pursuant to Federal Rule of Civil Procedure 60(b)(4) and Federal Rule of Bankruptcy Procedure 9024
1570	3/28/2025	Certificate of Service

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1622	4/23/2025	Eletson Holdings Inc.'s Objection to Motion of Elafonissos Shipping Corporation for Relief From the Court's Orders of January 29, 2025 and March 13, 2025 Pursuant to Federal Rule of Civil Procedure 60(b)(4) and Federal Rule of Bankruptcy Procedure 9024
1624	4/28/2025	Notice of Agenda of Matters Scheduled For Hearing on April 30, 2025 at 10:00 a.m.
1625	4/28/2025	Reply to Motion for Relief From the Court's Orders of January 29, 2025 and March 13, 2025 Pursuant to Federal Rule of Civil Procedure 60(b)(4) and Federal Rule of Bankruptcy Procedure 9024
1636	5/1/2025	Transcript of Hearing Held on April 30, 2025
1701	6/24/2025	Order signed on 6/24/2025 Regarding Supplemental Submissions
1708	6/27/2025	Letter to the Honorable John P. Mastando in Response to the Court's June 24, 2025 Order
1710	7/1/2025	Letter to the Honorable John P. Mastando III in Response to the Court's June 24, 2025 Order
1711	7/1/2025	Notice of Status Conference Date: 7/2/25
1721	7/3/2025	Transcript regarding Hearing Held on 7/2/2025
1725	7/16/2025	Elafonissos Shipping Corporation's Notice of Appeal
1726	7/16/2025	Majority Shareholders and Elafonissos Shipping Corporation's Notice of Appeal
1727	7/16/2025	Elafonissos Shipping Corporation's Notice of Appeal
1729	7/16/2025	Notice of Hearing of Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1730	7/16/2025	Declaration of Kyle J. Ortiz, Esq. in Support of Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1732	7/17/2025	Supplemental Declaration of J. Pierre II in Support of Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1733	7/17/2025	Supplemental Declaration of M. Orfanidou in Support of Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1734	7/17/2025	Letter to the Honorable John P. Mastando regarding Application for Attorneys' Fees and Costs
1735	7/17/2025	Letter to the Honorable John P. Mastando regarding Provisional Holdings July 17 <sup>th</sup> Letter

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1736	7/17/2025	Order Granting Reed Smith's Letter Requesting Extension of Time
1737	7/18/2025	Notice of Filing of June 18, 2025 Hearing Transcript
1738	7/22/2025	Provisional Eletson Holdings, Inc.'s Notice of Appeal
1739	7/22/2025	Affidavit of Service of C. Laukamg regarding Notice of Appeal
1740	7/18/2025	Transcript regarding Hearing Held on June 18, 2025
1741	7/23/2025	Debtor-Appellee's Designation of Additional Items to be Included in the Record on Appeal
1743	7/28/2025	Letter to the Honorable John P. Mastando regarding July 14, 2025 UK Court Decision
1747	7/30/2025	Adversary Proceeding (25-01120) Complaint
1748	7/30/2025	Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 2, 2025 Order Awarding Attorneys' Fees and Costs
1749	7/30/2025	Affidavit of Service of C. Laukamg regarding Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 2, 2025 Order Awarding Attorneys' Fees and Costs
1750	7/30/2025	Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the March 13, 2025 Sanctions Order
1751	7/30/2025	Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 7, 2025 Order Denying Elaфонissos' Motion for Relief from the Bankruptcy Court's January 29, 2025 and March 13, 2025 Orders
1752	7/30/2025	Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 8 Order Amending and Modifying the Bankruptcy Court's March 13, 2025 Order and Increasing Sanctions
1754	7/31/2025	Letter to the Honorable John P. Mastando in Response to the Reorganized Eletson Holdings, Inc.'s July 28, 2025 Letter

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1755	7/31/2025	The Eletson Holdings Inc. Entity's That the Second Circuit Recognizes as being Represented by the Undersigned Counsel in <i>In re: Eletson Holdings, Inc.</i> , NO. 25-176, Dkt. 50.1, Memorandum of Law in Opposition to Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1756	7/31/2025	Affidavit of Service of C. Laukamg regarding Memorandum of Law in Opposition to Eletson Holdings Inc.'s Application for Attonreys' Fees and Costs
1758	8/1/2025	Notice of Hearing of Eletson Holdings Inc.'s Application for Attorneys' Fees and Costs
1759	8/1/2025	Memorandum Opinion and Order Granting, in Part, Levona Holdings Ltd.'s Motion to Enforce the Stipulated Stay Relief Order and for Sanctions Against the Purported Preferred Nominees Pursuant to Section 105(a) of the Bankruptcy Code
1760	8/5/2025	Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 8, 2025 Order in Further Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1761	8/5/2025	Letter to the Honorable John P. Mastando Requesting a Discovery Conference
1762	8/5/2025	Affidavit of Service of C. Laukamg regarding Appellant's Statement of Issues to be Presented and Designation of Items to be Included in the Record on Appeal of the July 8, 2025 Order in Further Support of Confirmation and Consummation of the Court-Approved Plan of Reorganization
1763	8/6/2025	Order regarding Letter Requesting Discovery Conference
1764	8/6/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1765	8/6/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1769	8/8/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1770	8/8/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment and Greek Court Decision
1771	8/8/2025	Letter to the Honorable John P. Mastando regarding Memorandum and Opinion Order Signed on 8/1/2025

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1774	8/11/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1776	8/12/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1777	8/12/2025	Letter in Response to August 11, 2025 Letter
1782	8/13/2025	Joinder of Majority Shareholders and Elafonissos Shipping Corporation in Opposition to Eletson Holding Inc.'s Application for Attorneys' Fees and Costs
1785	8/15/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1786	8/15/2025	Letter to the Honorable John P. Mastando regarding Proposed Judgment
1787	8/17/2025	Eletson Holdings Inc.'s Response to Objections to the Application for Attorneys' Fees and Costs
1788	8/18/2025	Notice of Agenda of Matters Scheduled for Hearing to be Held on August 20, 2025 at 9:00 A.M.
1790	8/19/2025	Letter to Honorable Mastando from Hal S. Shaftel
1791	8/19/2025	Amended Notice of Agenda of Matters Scheduled for Hearing to be Held on August 20, 2025 at 9:00 A.M
1792	8/19/2025	Eletson Holdings Inc.'s Motion to Compel Production of Documents
1793	8/19/2025	Chapter 11 Post-Confirmation Report for the Quarter Ending: 06/30/2025
1796	8/21/2025	Letter to the Honorable John P. Mastando regarding August 19, 2025 D. Ct. Hearing Transcript
1797	8/21/2025	Transcript regarding Hearing Held on 8/20/2025
1798	8/26/2025	Notice of Hearing of Motion of Eletson Holdings Inc. for Entry of an Order Directing Floyd Zadhovich LLP to Disclose Submissions in Foreign Arbitrations
1799	8/26/2025	Declaration of Luke Francis Zadkovich
1804	9/2/2025	Lassia Investment Company's, Glafkos Trust Company's, And Family Unit Trust Company's Opposition to Eletson Holdings Inc.'s Motion to Compel Production of Documents
1805	9/2/2025	Declaration of F. Catalina in Support of Lassia Investment Company's, Glafkos Trust Company's, And Family Unit Trust Company's Opposition to Eletson Holdings Inc.'s Motion to Compel Production of Documents

<b>Dkt. No.</b>	<b>Date Filed</b>	<b>Description</b>
1806	9/3/2025	Majority Shareholders and Elafonissos Shipping Corporation's Notice of Appeal
1836	9/22/2025	Judgment Against Vasilis Hadjieleftheriadis, Purported Provisional Board, Former Majority Shareholders, Former Minority Shareholders and Laskarina Karastamati
1849	10/06/2025	Majority Shareholders' and Elafonissos Shipping Corporation's Notice of Appeal

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

<b>Trial Exhibit No.</b>	<b>Description</b>
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



<b>Trial Exhibit No.</b>	<b>Description</b>
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.

<b>Trial Exhibit No.</b>	<b>Description</b>
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 25HIRE (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 Mastando
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

<b>Trial Exhibit No.</b>	<b>Description</b>
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 Debtor

<b>Trial Exhibit No.</b>	<b>Description</b>
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

<b>Trial Exhibit No.</b>	<b>Description</b>
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

### **III. Certification Regarding Transcripts**

Pursuant to Bankruptcy Rule 8009(b)(1), Appellant hereby certifies that it is not ordering any transcripts. All transcripts have been prepared, are available on the docket, and are designated in the foregoing designation of the record.

### **IV. Reservation of Rights**

Appellant reserves and does not waive any of its rights to supplement this statement of issues for appeal and the designation of the record for appeal contained herein. This filing is made expressly subject to, and without waiver of, any and all rights, remedies, challenges and objections.

Dated: November 17, 2025  
New York, New York

Respectfully submitted,

*/s/ Lawrence M. Rolnick*

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*Counsel for Appellants*

# EXHIBIT 1

**Justin Harris**

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**Subject:** FW: In re Eletson Holdings, Inc., et al., Case No. 23-10322 (JPM)  
**Attachments:** Eleston Holdings - Proposed Judgment.docx

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**From:** Sharret, Jennifer <[jennifer.sharret@hsfkramer.com](mailto:jennifer.sharret@hsfkramer.com)>  
**Sent:** Wednesday, August 6, 2025 3:05:00 PM  
**To:** [JPM.orders@nysb.uscourts.gov](mailto:JPM.orders@nysb.uscourts.gov) <[JPM.orders@nysb.uscourts.gov](mailto:JPM.orders@nysb.uscourts.gov)>  
**Cc:** Lawrence Rolnick <[lrolnick@rksllp.com](mailto:lrolnick@rksllp.com)>; Richard Bodnar <[rbodnar@rksllp.com](mailto:rbodnar@rksllp.com)>; Frank Catalina <[fcatalina@rksllp.com](mailto:fcatalina@rksllp.com)>; Solomon, Louis M. <[LSolomon@reedsmith.com](mailto:LSolomon@reedsmith.com)>; Underwood, Colin A. <[CUnderwood@reedsmith.com](mailto:CUnderwood@reedsmith.com)>; Conn, Alyssa F. <[AConn@reedsmith.com](mailto:AConn@reedsmith.com)>; Peles, Joshua M. <[JPeles@reedsmith.com](mailto:JPeles@reedsmith.com)>; [vasilis.hadjieleftheriadis@eletson.com](mailto:vasilis.hadjieleftheriadis@eletson.com) <[vasilis.hadjieleftheriadis@eletson.com](mailto:vasilis.hadjieleftheriadis@eletson.com)>; [lascarina.karastamati@eletson.com](mailto:lascarina.karastamati@eletson.com) <[lascarina.karastamati@eletson.com](mailto:lascarina.karastamati@eletson.com)>; [ioannis.zilakos@eletson.com](mailto:ioannis.zilakos@eletson.com) <[ioannis.zilakos@eletson.com](mailto:ioannis.zilakos@eletson.com)>; [manolis.andreoulakis@eletson.com](mailto:manolis.andreoulakis@eletson.com) <[manolis.andreoulakis@eletson.com](mailto:manolis.andreoulakis@eletson.com)>; Ortiz, Kyle J. <[kyle.ortiz@hsfkramer.com](mailto:kyle.ortiz@hsfkramer.com)>; Shaughnessy, Brian F. <[brian.shaughnessy@hsfkramer.com](mailto:brian.shaughnessy@hsfkramer.com)>  
**Subject:** In re Eletson Holdings, Inc., et al., Case No. 23-10322 (JPM)

Dear Chambers,

We write on behalf of Eletson Holdings Inc. requesting entry of the attached judgment relating to prior coercive sanctions ordered against the following parties through and including July 31, 2025: (1) Former Majority Shareholders (Family Unit Trust Company, Glafkos Trust Company, and Lassia Investment Company), (2) Vasilis Hadjieleftheriadis (also known as Vassilis Chatzieleftheriadis), (3) each other individual on the Purported Provisional Board (Konstatinos Chatzieleftheriadis, Ioannis Zilakos, Niki Zilakos, Adrianos Psomadakis-Karastamatis, Eleni Giannakopoulous, Panos Paxinoz, and Emmanuel Andreoulaks), (4) Purported Provisional Holdings, (5) Former Minority Shareholders (Elafonissos Shipping Corporation and Keros Shipping Corporation) and (6) Laskarina Karastamati.

The proposed judgment includes a chart that explains the calculation of the judgment as to each sanctioned party based on the Court's prior Sanctions Orders (Docket Nos. 1495, 1537 and 1716).

Please let us know if you have any questions.

Thank you.

- Jennifer

**Jennifer Sharret**  
Counsel  
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