

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

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In re: ELETSON HOLDINGS INC, : Chapter 11  
: Case No. 23-10322 (JPM)  
Debtor/Judgment Creditor.<sup>1</sup> :  
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**DECLARATION OF JACLYN GRODIN IN CONNECTION WITH  
ELETSON HOLDINGS INC.'S OPPOSITION TO MOTION TO QUASH**

I, JACLYN GRODIN, under penalty of perjury, declare as follows:

1. I am counsel at the law firm of Goulston & Storrs PC ("Goulston"), which represents Eletson Holdings Inc. ("Holdings") in connection with the above-captioned proceeding.
2. This declaration is made based on my personal knowledge.
3. I respectfully submit this declaration in connection with Holdings' opposition to the *Motion to Quash or for a Partial Protective Order* [Dkt. 1888] filed by non-party Rolnick Kramer Sadighi LLC ("RKS") on behalf of itself and its clients, judgment debtors Lassia Investment Company, Glafkos Trust Company, Family Unity Trust Company, and Elafonissos Shipping Corporation (the "Moving Judgment Debtors," together with RKS, the "Moving Parties").
4. On September 22, 2025, this Court entered a judgment [Dkt. 1836] (the "Judgment") in favor of Holdings and against fourteen judgment debtors (the "Judgment Debtors"), including the Moving Judgment Debtors, in amounts ranging from \$150,000 to \$873,000, plus interest from September 22, 2025.

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<sup>1</sup> 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.



5. On October 20, 2025, Holdings served two information subpoenas (the “Information Subpoenas”) upon RKS and Reed Smith LLP (“Reed Smith”), two law firms whom Holdings reasonably believes each have, or had, a relationship with each of the Judgment Debtors, and who are each in possession of information about the Judgment Debtors that will assist Holdings in collecting the Judgment.

6. Each of the Information Subpoenas included the following attorney certification:

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.

7. The language used in the attorney certifications within the Information Subpoenas tracks the language that the District Court blessed just last year in *Avalon Holdings Corp. v. Guy Gentile*, Case No. 18-cv-7291 (DLC) (RLJ), Dkt. No. 359-1, which provides as follows:

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

8. Any deviation in the attorney certifications within the Information Subpoenas from the text of C.P.L.R. §5224(a)(3)(i) was inadvertent and immaterial.

9. To resolve any purported defect in the attorney certifications contained within the Information Subpoenas, and moot this purported issue, I hereby certify, with respect to each of the Information Subpoenas served on RKS and Reed Smith, as follows:

I hereby certify that the Information Subpoena complies with Rule 5224 of the (New York) Civil Practice Law and Rules and Section 601 of the General Business Law that I have a reasonable belief that the party receiving this Subpoena has in their possession information about each of the Judgment Debtors that will assist the Judgment Creditor in collecting the Judgment.

10. My reasonable belief that both Reed Smith and RKS each have relevant information about each of the fourteen Judgment Debtors is based on information learned during the course of this dispute, including, but not limited to, the following: (i) RKS is current counsel to the Moving Judgment Debtors; (ii) Reed Smith was former counsel to Holdings, which was owned by the Moving Judgment Debtors; (iii) eight of the individual Judgment Debtors were members of the so-called “provisional board” of Holdings, which was appointed—and since dissolved—by the First Instance Court of Piraeus in Greece upon the *ex parte* application of the former minority shareholders of Holdings, including Elafonissos Shipping Corporation (one of the Moving Judgment Debtors, currently represented by RKS); (iv) Lascarina Karastamati is an individual, former director of Holdings, who upon information and belief, also directs (or previously directed) of the Lassia Investment Company for the benefit of the Karastamati family; and (v) Vasilis Hadjieleftheriadis is an individual, former director of Holdings, who upon information and belief also directs (or previously directed) the Glafkos Trust Company for the benefit of the Hadjieleftheriadis family.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 5, 2025

/s/ Jaclyn Grodin  
Jaclyn Grodin