

**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.¹ :
-----X

**DECLARATION OF NATHANIEL R.B. KOSLOF IN SUPPORT OF
ELETSON HOLDINGS INC.'S MOTION TO COMPEL THE ENTITY JUDGMENT
DEBTORS' DEPOSITIONS IN AID OF JUDGMENT ENFORCEMENT**

I, NATHANIEL R.B. KOSLOF, under penalty of perjury, declare as follows:

1. I am an associate at Goulston & Storrs PC ("Goulston"), which represents Judgment Creditor Eletson Holdings Inc. ("Holdings").
2. I respectfully submit this declaration in support of Holdings' Motion to Compel the Entity Judgment Debtors' Depositions in Aid of Judgment Enforcement (the "Motion").
3. This declaration is made based on my personal knowledge.
4. Annexed hereto as **Exhibit 1** are true and accurate copies of the Rule 30(b)(6) deposition notices, dated October 24, 2025, with Schedule A annexed thereto ("Rule 30(b)(6) Notices") that Holdings served on judgment debtors Lassia Investment Company, Glafkos Trust Company, Family Unity Trust Company, and Elafonissos Shipping Corporation ("Entity Judgment Debtors").
5. Annexed hereto as **Exhibit 2** is a true and accurate copy of Holdings' certificate of service certifying service of the Rule 30(b)(6) Notices on the Entity Judgment Debtors care of their counsel, Rolnick Kramer Sadighi LLP ("RKS"), by first-class mail and email on October 24, 2025.

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.



6. Annexed hereto as **Exhibit 3** is a true and accurate copy of an email dated November 25, 2025.

7. On November 12, 2025, my colleague Rae Berger and I represented Holdings at a Zoom conference with counsel to the Entity Judgment Debtors, Richard Bodnar and Justin Harris of RKS. During the Zoom conference, both sides conferred in good faith concerning the Rule 30(b)(6) Notices in an effort to resolve the issues raised by the Motion but were unable to reach agreement.

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

Dated: December 8, 2025

/s/ Nathaniel R.B. Koslof
Jennifer B. Furey (admitted *pro hac vice*)
Nathaniel R.B. Koslof (admitted *pro hac vice*)
GOULSTON & STORRS PC
One Post Office Square, 28th Floor
Boston, MA 02109
jffurey@goulstonstorrs.com
nkoslof@goulstonstorrs.com
Tel: (617) 574-3575

Jaclyn Grodin
Rae Berger
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, NY 10017
jgrodin@goulstonstorrs.com
rberger@goulstonstorrs.com
Tel: (212) 878-5065

Counsel for Eletson Holdings Inc.

EXHIBIT 1

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

-----X
In re: ELETSON HOLDINGS INC., : Chapter 11
: Case No. 23-10322 (JPM)
Debtor/Judgment Creditor.¹ :
-----X

**DEBTOR/JUDGMENT CREDITOR ELETSON HOLDINGS INC.'S
NOTICE OF RULE 30(b)(6) DEPOSITION OF JUDGMENT DEBTOR
GLAFKOS TRUST COMPANY**

TO: **Glafkos Trust Company**, by and through its attorney of record, Rolnick
Kramer Sadighi LLP, Attn: Lawrence M. Rolnick, PENN 1, Suite 3401, One
Pennsylvania Plaza, New York, NY 10119.

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 30 of the Federal Rules of
Civil Procedure, Debtor/Judgment Creditor Eletson Holdings Inc. (“Holdings”) will take the oral
deposition of Judgment Debtor Glafkos Trust Company (“Glafkos”) regarding the topics set forth
in Schedule A to the Notice of Rule 30(b)(6) Deposition. Pursuant to Rule 30(b)(6), Glafkos must
designate one or more persons to testify on its behalf with respect to these topics. At least ten days
prior to the deposition, Glafkos is requested to designate in writing to Eletson the name(s) of the
person(s) who will testify on its behalf concerning the topics set forth in Schedule A, and for each
such written designation, the topic(s) as to which that person will testify.

The deposition will be held at the offices of Goulston & Storrs P.C., located at 730 Third
Avenue, New York, NY 10017, on November 11, 2025, or at another time and place as the parties
may agree, and will be recorded by stenographic means and/or non-stenographic videotaped

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.

recording. The deposition will begin at 2:00 p.m. EST and will continue from day to day until completed.

Dated: October 24, 2025
New York, New York

GOULSTON & STORRS PC

By:

/s/ Jaclyn Grodin

Jaclyn Grodin
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, New York 10017
jgrodin@goulstonstorrs.com
(212) 878-5053

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One Post Office Square, 28th Floor
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jfarey@goulstonstorrs.com
nkoslof@goulstonstorrs.com
(617) 574-3575

Counsel for Eletson Holdings Inc.

SCHEDULE A

DEFINITIONS

1. “You” or “Your” means Glafkos Trust Company and Your agents, representatives, accountants, attorneys, and all other persons or entities acting or purporting to act for or on Your behalf.

2. “Account Record” means and includes monthly, quarterly, annual or other periodic statements of account balances or summaries of transactions, cancelled checks, deposit receipts, transaction notices, wire transfer notices, check registers, check stubs, general ledgers, and other records of deposits, transfers, investments, withdrawals or other transactions of any kind.

3. “Communication” is used in its broadest sense to encompass any transmission or exchange of thoughts, ideas, data, messages, inquiries or information of any kind in any form whatsoever, between or among any two or more persons, including without limitation, between or among parts, divisions, employees or agents of a person other than a natural person, whether such transmissions or exchanges are oral or written and whether they are personally, electronically or otherwise generated, transcribed, transmitted or recorded.

4. “Document” shall be interpreted in its broadest sense and means the full scope of documents and things obtainable under the Federal Rule of Civil Procedure 34. “Document” means any medium upon which facts, data or information can be recorded or retrieved, or any manner in which the ideas, thoughts or mental processes of one individual can be conveyed to another, and includes the original, all drafts, and all non-identical copies, including all copies which are different in any way from the original (whether by interlineations, receipt stamp, notations, indication of copy sent or received, changes, cancellations, revocations, rescissions, terminations, memoranda, addenda, supplements, amendments, additions, revisions, exhibits and appendices, or other information not on the originals), regardless of origin and location. This includes without

limitation all written or graphic matter, however produced and reproduced, including without limitation matter that is handwritten, typed, printed, photostated, photographed, recorded, transcribed, punched, taped, filmed or graphic matter of any kind whatsoever, including computer tapes and any other means of recording upon any tangible thing, any form of Communication or representation, including letters, words, numbers, pictures, sounds or symbols or combination thereof. The term "Document" shall further include, without limitation, electronic and magnetically stored forms of data, including electronic mail. Each non-identical copy of a Document (whether different from the original because of stamps, indications of recipient, handwritten notes, marks, attachment to different documents, or for any other reason) is a separate document to be produced. Each document that is attached by staple, clip or otherwise to a document requested herein, or referred to as an exhibit, appendix, schedule, amendment, rider or supplement to a requested document, shall also be produced (attached in the same manner as the original) regardless of whether the production of that document is otherwise requested herein. Each request herein for documents to be produced requires production of the documents in their entirety without abbreviation or expurgation.

5. Documents or Communications that "refer or relate to" a given subject are those that constitute, comprise, identify, deal with, contain, embody, reflect, state, comment on, describe, respond to, analyze or in any way pertain to that subject matter.

6. "Identify" when used in reference to a document means to confirm the existence of the document and describe the nature, custody, condition, location, and contents of the document.

7. "Identify" when used in reference to a natural person means to state that person's name, address and telephone number.

8. “Identify” when used in reference to an entity other than a natural person means to state the name of the entity, the present or last known address of the entity, and the legal nature of the entity (e.g., corporation, partnership, etc.).

9. “Net Worth” means the sum of all Your assets minus the sum of all Your liabilities.

10. “Person” or “entity” includes the plural as well as the singular and means any natural person, corporation, partnership, sole proprietorship, association, federation, or other recognizable entity unless the context indicates otherwise.

TOPICS FOR TESTIMONY

1. Your current Net Worth.

2. All accounts in Your name, for Your benefit or over which You have or had signature authority at any bank, foreign or domestic; brokerage or investment firm; or any other custodian, trustee or bailee.

3. The current value of any interest You have, whether direct or indirect, legal or beneficial, in any asset having a fair value of \$5,000 or greater as of the date of Your response, including without limitation any interest in any real property; corporate or similar entity; claims receivable; accounts receivable; intellectual property; motor vehicles, including without limitation automobiles, motorcycles, watercraft, and airplanes; cell towers, line time, or other telecommunications equipment; works of art, jewelry, antiques, wine collections, stamps, horses, or other similar personal property; publicly traded and privately held securities, whether debt or equity, including those currently held and outstanding option contracts or any other instruments or rights; commodities and commodity options; bank accounts, off-shore accounts, trust accounts, brokerage accounts, or other depository accounts; cash-on-hand; and all other assets of value of any kind or nature whatsoever.

4. The current amount of all of Your liabilities having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

5. The current value of liabilities that a person or entity owes to You having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

6. Any persons or entities who You believe have or had knowledge of Your assets or finances from January 1, 2023, to the present, including but not limited to accountants, bank representatives, securities brokers or account executives, financial advisors, trustees, partners, or business associates.

7. All Your transfers of assets having a value of \$5,000 or greater to any person from January 1, 2025, to the present date, including without limitation gifts of cash or goods, loans, or trust accounts.

8. All assets You claim are exempt from collection.

9. All current sources of income, including without limitation rental or leasing income, commissions, allowances, licensing fees, interest, dividends and capital gains.

10. The value of all insurance policies, including without limitation property insurance policies, in which You are the insured or the beneficiary or for which You pay or have paid the premiums, directly or indirectly.

**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.¹

:
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**DEBTOR/JUDGMENT CREDITOR ELETSON HOLDINGS INC.'S
NOTICE OF RULE 30(b)(6) DEPOSITION OF JUDGMENT DEBTOR
LASSIA INVESTMENT COMPANY**

TO: **Lassia Investment Company**, by and through its attorney of record,
Rolnick Kramer Sadighi LLP, Attn: Lawrence M. Rolnick, PENN 1, Suite
3401, One Pennsylvania Plaza, New York, NY 10119.

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Debtor/Judgment Creditor Eletson Holdings Inc. (“Holdings”) will take the oral deposition of Judgment Debtor Lassia Investment Company (“Lassia”) regarding the topics set forth in Schedule A to the Notice of Rule 30(b)(6) Deposition. Pursuant to Rule 30(b)(6), Lassia must designate one or more persons to testify on its behalf with respect to these topics. At least ten days prior to the deposition, Lassia is requested to designate in writing to Eletson the name(s) of the person(s) who will testify on its behalf concerning the topics set forth in Schedule A, and for each such written designation, the topic(s) as to which that person will testify.

The deposition will be held at the offices of Goulston & Storrs P.C., located at 730 Third Avenue, New York, NY 10017, on November 12, 2025, or at another time and place as the parties may agree, and will be recorded by stenographic means and/or non-stenographic videotaped

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.

recording. The deposition will begin at 2:00 p.m. EST and will continue from day to day until completed.

Dated: October 24, 2025
New York, New York

GOULSTON & STORRS PC

By:

/s/ Jaclyn Grodin

Jaclyn Grodin
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, New York 10017
jgrodin@goulstonstorrs.com
(212) 878-5053

Jennifer B. Furey
Nathaniel R.B. Koslof
GOULSTON & STORRS PC
One Post Office Square, 28th Floor
Boston, MA 02109
jfarey@goulstonstorrs.com
nkoslof@goulstonstorrs.com
(617) 574-3575

Counsel for Eletson Holdings Inc.

SCHEDULE A

DEFINITIONS

1. “You” or “Your” means Lassia Investment Company and Your agents, representatives, accountants, attorneys, and all other persons or entities acting or purporting to act for or on Your behalf.

2. “Account Record” means and includes monthly, quarterly, annual or other periodic statements of account balances or summaries of transactions, cancelled checks, deposit receipts, transaction notices, wire transfer notices, check registers, check stubs, general ledgers, and other records of deposits, transfers, investments, withdrawals or other transactions of any kind.

3. “Communication” is used in its broadest sense to encompass any transmission or exchange of thoughts, ideas, data, messages, inquiries or information of any kind in any form whatsoever, between or among any two or more persons, including without limitation, between or among parts, divisions, employees or agents of a person other than a natural person, whether such transmissions or exchanges are oral or written and whether they are personally, electronically or otherwise generated, transcribed, transmitted or recorded.

4. “Document” shall be interpreted in its broadest sense and means the full scope of documents and things obtainable under the Federal Rule of Civil Procedure 34. “Document” means any medium upon which facts, data or information can be recorded or retrieved, or any manner in which the ideas, thoughts or mental processes of one individual can be conveyed to another, and includes the original, all drafts, and all non-identical copies, including all copies which are different in any way from the original (whether by interlineations, receipt stamp, notations, indication of copy sent or received, changes, cancellations, revocations, rescissions, terminations, memoranda, addenda, supplements, amendments, additions, revisions, exhibits and appendices, or other information not on the originals), regardless of origin and location. This includes without

limitation all written or graphic matter, however produced and reproduced, including without limitation matter that is handwritten, typed, printed, photostated, photographed, recorded, transcribed, punched, taped, filmed or graphic matter of any kind whatsoever, including computer tapes and any other means of recording upon any tangible thing, any form of Communication or representation, including letters, words, numbers, pictures, sounds or symbols or combination thereof. The term "Document" shall further include, without limitation, electronic and magnetically stored forms of data, including electronic mail. Each non-identical copy of a Document (whether different from the original because of stamps, indications of recipient, handwritten notes, marks, attachment to different documents, or for any other reason) is a separate document to be produced. Each document that is attached by staple, clip or otherwise to a document requested herein, or referred to as an exhibit, appendix, schedule, amendment, rider or supplement to a requested document, shall also be produced (attached in the same manner as the original) regardless of whether the production of that document is otherwise requested herein. Each request herein for documents to be produced requires production of the documents in their entirety without abbreviation or expurgation.

5. Documents or Communications that "refer or relate to" a given subject are those that constitute, comprise, identify, deal with, contain, embody, reflect, state, comment on, describe, respond to, analyze or in any way pertain to that subject matter.

6. "Identify" when used in reference to a document means to confirm the existence of the document and describe the nature, custody, condition, location, and contents of the document.

7. "Identify" when used in reference to a natural person means to state that person's name, address and telephone number.

8. “Identify” when used in reference to an entity other than a natural person means to state the name of the entity, the present or last known address of the entity, and the legal nature of the entity (e.g., corporation, partnership, etc.).

9. “Net Worth” means the sum of all Your assets minus the sum of all Your liabilities.

10. “Person” or “entity” includes the plural as well as the singular and means any natural person, corporation, partnership, sole proprietorship, association, federation, or other recognizable entity unless the context indicates otherwise.

TOPICS FOR TESTIMONY

1. Your current Net Worth.

2. All accounts in Your name, for Your benefit or over which You have or had signature authority at any bank, foreign or domestic; brokerage or investment firm; or any other custodian, trustee or bailee.

3. The current value of any interest You have, whether direct or indirect, legal or beneficial, in any asset having a fair value of \$5,000 or greater as of the date of Your response, including without limitation any interest in any real property; corporate or similar entity; claims receivable; accounts receivable; intellectual property; motor vehicles, including without limitation automobiles, motorcycles, watercraft, and airplanes; cell towers, line time, or other telecommunications equipment; works of art, jewelry, antiques, wine collections, stamps, horses, or other similar personal property; publicly traded and privately held securities, whether debt or equity, including those currently held and outstanding option contracts or any other instruments or rights; commodities and commodity options; bank accounts, off-shore accounts, trust accounts, brokerage accounts, or other depository accounts; cash-on-hand; and all other assets of value of any kind or nature whatsoever.

4. The current amount of all of Your liabilities having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

5. The current value of liabilities that a person or entity owes to You having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

6. Any persons or entities who You believe have or had knowledge of Your assets or finances from January 1, 2023, to the present, including but not limited to accountants, bank representatives, securities brokers or account executives, financial advisors, trustees, partners, or business associates.

7. All Your transfers of assets having a value of \$5,000 or greater to any person from January 1, 2025, to the present date, including without limitation gifts of cash or goods, loans, or trust accounts.

8. All assets You claim are exempt from collection.

9. All current sources of income, including without limitation rental or leasing income, commissions, allowances, licensing fees, interest, dividends and capital gains.

10. The value of all insurance policies, including without limitation property insurance policies, in which You are the insured or the beneficiary or for which You pay or have paid the premiums, directly or indirectly.

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

-----X
In re: ELETSON HOLDINGS INC.,

: Chapter 11

: Case No. 23-10322 (JPM)

Debtor/Judgment Creditor.¹

:
-----X

**DEBTOR/JUDGMENT CREDITOR ELETSON HOLDINGS INC.'S
NOTICE OF RULE 30(b)(6) DEPOSITION OF JUDGMENT DEBTOR
ELAFONISSOS SHIPPING CORPORATION**

TO: **Elafonissos Shipping Corporation**, by and through its attorney of record,
Rolnick Kramer Sadighi LLP, Attn: Lawrence M. Rolnick, PENN 1, Suite
3401, One Pennsylvania Plaza, New York, NY 10119.

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Debtor/Judgment Creditor Eletson Holdings Inc. ("Holdings") will take the oral deposition of Judgment Debtor Elafonissos Shipping Corporation ("Elafonissos") regarding the topics set forth in Schedule A to the Notice of Rule 30(b)(6) Deposition. Pursuant to Rule 30(b)(6), Elafonissos must designate one or more persons to testify on its behalf with respect to these topics. At least ten days prior to the deposition, Elafonissos is requested to designate in writing to Eletson the name(s) of the person(s) who will testify on its behalf concerning the topics set forth in Schedule A, and for each such written designation, the topic(s) as to which that person will testify.

The deposition will be held at the offices of Goulston & Storrs P.C., located at 730 Third Avenue, New York, NY 10017, on November 13, 2025, or at another time and place as the parties may agree, and will be recorded by stenographic means and/or non-stenographic videotaped

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.

recording. The deposition will begin at 9:30 a.m. EST and will continue from day to day until completed.

Dated: October 24, 2025
New York, New York

GOULSTON & STORRS PC

By:

/s/ Jaclyn Grodin

Jaclyn Grodin
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, New York 10017
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(212) 878-5053

Jennifer B. Furey
Nathaniel R.B. Koslof
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One Post Office Square, 28th Floor
Boston, MA 02109
jfarey@goulstonstorrs.com
nkoslof@goulstonstorrs.com
(617) 574-3575

Counsel for Eletson Holdings Inc.

SCHEDULE A

DEFINITIONS

1. “You” or “Your” means Elafonissos Shipping Corporation and Your agents, representatives, accountants, attorneys, and all other persons or entities acting or purporting to act for or on Your behalf.

2. “Account Record” means and includes monthly, quarterly, annual or other periodic statements of account balances or summaries of transactions, cancelled checks, deposit receipts, transaction notices, wire transfer notices, check registers, check stubs, general ledgers, and other records of deposits, transfers, investments, withdrawals or other transactions of any kind.

3. “Communication” is used in its broadest sense to encompass any transmission or exchange of thoughts, ideas, data, messages, inquiries or information of any kind in any form whatsoever, between or among any two or more persons, including without limitation, between or among parts, divisions, employees or agents of a person other than a natural person, whether such transmissions or exchanges are oral or written and whether they are personally, electronically or otherwise generated, transcribed, transmitted or recorded.

4. “Document” shall be interpreted in its broadest sense and means the full scope of documents and things obtainable under the Federal Rule of Civil Procedure 34. “Document” means any medium upon which facts, data or information can be recorded or retrieved, or any manner in which the ideas, thoughts or mental processes of one individual can be conveyed to another, and includes the original, all drafts, and all non-identical copies, including all copies which are different in any way from the original (whether by interlineations, receipt stamp, notations, indication of copy sent or received, changes, cancellations, revocations, rescissions, terminations, memoranda, addenda, supplements, amendments, additions, revisions, exhibits and appendices, or other information not on the originals), regardless of origin and location. This includes without

limitation all written or graphic matter, however produced and reproduced, including without limitation matter that is handwritten, typed, printed, photostated, photographed, recorded, transcribed, punched, taped, filmed or graphic matter of any kind whatsoever, including computer tapes and any other means of recording upon any tangible thing, any form of Communication or representation, including letters, words, numbers, pictures, sounds or symbols or combination thereof. The term "Document" shall further include, without limitation, electronic and magnetically stored forms of data, including electronic mail. Each non-identical copy of a Document (whether different from the original because of stamps, indications of recipient, handwritten notes, marks, attachment to different documents, or for any other reason) is a separate document to be produced. Each document that is attached by staple, clip or otherwise to a document requested herein, or referred to as an exhibit, appendix, schedule, amendment, rider or supplement to a requested document, shall also be produced (attached in the same manner as the original) regardless of whether the production of that document is otherwise requested herein. Each request herein for documents to be produced requires production of the documents in their entirety without abbreviation or expurgation.

5. Documents or Communications that "refer or relate to" a given subject are those that constitute, comprise, identify, deal with, contain, embody, reflect, state, comment on, describe, respond to, analyze or in any way pertain to that subject matter.

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9. “Net Worth” means the sum of all Your assets minus the sum of all Your liabilities.

10. “Person” or “entity” includes the plural as well as the singular and means any natural person, corporation, partnership, sole proprietorship, association, federation, or other recognizable entity unless the context indicates otherwise.

TOPICS FOR TESTIMONY

1. Your current Net Worth.

2. All accounts in Your name, for Your benefit or over which You have or had signature authority at any bank, foreign or domestic; brokerage or investment firm; or any other custodian, trustee or bailee.

3. The current value of any interest You have, whether direct or indirect, legal or beneficial, in any asset having a fair value of \$5,000 or greater as of the date of Your response, including without limitation any interest in any real property; corporate or similar entity; claims receivable; accounts receivable; intellectual property; motor vehicles, including without limitation automobiles, motorcycles, watercraft, and airplanes; cell towers, line time, or other telecommunications equipment; works of art, jewelry, antiques, wine collections, stamps, horses, or other similar personal property; publicly traded and privately held securities, whether debt or equity, including those currently held and outstanding option contracts or any other instruments or rights; commodities and commodity options; bank accounts, off-shore accounts, trust accounts, brokerage accounts, or other depository accounts; cash-on-hand; and all other assets of value of any kind or nature whatsoever.

4. The current amount of all of Your liabilities having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

5. The current value of liabilities that a person or entity owes to You having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

6. Any persons or entities who You believe have or had knowledge of Your assets or finances from January 1, 2023, to the present, including but not limited to accountants, bank representatives, securities brokers or account executives, financial advisors, trustees, partners, or business associates.

7. All Your transfers of assets having a value of \$5,000 or greater to any person from January 1, 2025, to the present date, including without limitation gifts of cash or goods, loans, or trust accounts.

8. All assets You claim are exempt from collection.

9. All current sources of income, including without limitation rental or leasing income, commissions, allowances, licensing fees, interest, dividends and capital gains.

10. The value of all insurance policies, including without limitation property insurance policies, in which You are the insured or the beneficiary or for which You pay or have paid the premiums, directly or indirectly.

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

-----X
In re: ELETSON HOLDINGS INC., : Chapter 11
: Case No. 23-10322 (JPM)
Debtor/Judgment Creditor.¹ :
-----X

**DEBTOR/JUDGMENT CREDITOR ELETSON HOLDINGS INC.'S
NOTICE OF RULE 30(b)(6) DEPOSITION OF JUDGMENT DEBTOR
FAMILY UNITY TRUST COMPANY**

TO: **Family Unity Trust Company**, by and through its attorney of record,
Rolnick Kramer Sadighi LLP, Attn: Lawrence M. Rolnick, PENN 1, Suite
3401, One Pennsylvania Plaza, New York, NY 10119.

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Debtor/Judgment Creditor Eletson Holdings Inc. (“Holdings”) will take the oral deposition of Judgment Debtor Family Unity Trust Company (“Family Unity”) regarding the topics set forth in Schedule A to the Notice of Rule 30(b)(6) Deposition. Pursuant to Rule 30(b)(6), Family Unity must designate one or more persons to testify on its behalf with respect to these topics. At least ten days prior to the deposition, Family Unity is requested to designate in writing to Eletson the name(s) of the person(s) who will testify on its behalf concerning the topics set forth in Schedule A, and for each such written designation, the topic(s) as to which that person will testify.

The deposition will be held at the offices of Goulston & Storrs P.C., located at 730 Third Avenue, New York, NY 10017, on November 13, 2025, or at another time and place as the parties may agree, and will be recorded by stenographic means and/or non-stenographic videotaped

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.

recording. The deposition will begin at 2:00 p.m. EST and will continue from day to day until completed.

Dated: October 24, 2025
New York, New York

GOULSTON & STORRS PC

By:

/s/ Jaclyn Grodin

Jaclyn Grodin
GOULSTON & STORRS PC
730 Third Avenue, 12th Floor
New York, New York 10017
jgrodin@goulstonstorrs.com
(212) 878-5053

Jennifer B. Furey
Nathaniel R.B. Koslof
GOULSTON & STORRS PC
One Post Office Square, 28th Floor
Boston, MA 02109
jfarey@goulstonstorrs.com
nkoslof@goulstonstorrs.com
(617) 574-3575

Counsel for Eletson Holdings Inc.

SCHEDULE A

DEFINITIONS

1. “You” or “Your” means Family Unity Trust Company and Your agents, representatives, accountants, attorneys, and all other persons or entities acting or purporting to act for or on Your behalf.

2. “Account Record” means and includes monthly, quarterly, annual or other periodic statements of account balances or summaries of transactions, cancelled checks, deposit receipts, transaction notices, wire transfer notices, check registers, check stubs, general ledgers, and other records of deposits, transfers, investments, withdrawals or other transactions of any kind.

3. “Communication” is used in its broadest sense to encompass any transmission or exchange of thoughts, ideas, data, messages, inquiries or information of any kind in any form whatsoever, between or among any two or more persons, including without limitation, between or among parts, divisions, employees or agents of a person other than a natural person, whether such transmissions or exchanges are oral or written and whether they are personally, electronically or otherwise generated, transcribed, transmitted or recorded.

4. “Document” shall be interpreted in its broadest sense and means the full scope of documents and things obtainable under the Federal Rule of Civil Procedure 34. “Document” means any medium upon which facts, data or information can be recorded or retrieved, or any manner in which the ideas, thoughts or mental processes of one individual can be conveyed to another, and includes the original, all drafts, and all non-identical copies, including all copies which are different in any way from the original (whether by interlineations, receipt stamp, notations, indication of copy sent or received, changes, cancellations, revocations, rescissions, terminations, memoranda, addenda, supplements, amendments, additions, revisions, exhibits and appendices, or other information not on the originals), regardless of origin and location. This includes without

limitation all written or graphic matter, however produced and reproduced, including without limitation matter that is handwritten, typed, printed, photostated, photographed, recorded, transcribed, punched, taped, filmed or graphic matter of any kind whatsoever, including computer tapes and any other means of recording upon any tangible thing, any form of Communication or representation, including letters, words, numbers, pictures, sounds or symbols or combination thereof. The term "Document" shall further include, without limitation, electronic and magnetically stored forms of data, including electronic mail. Each non-identical copy of a Document (whether different from the original because of stamps, indications of recipient, handwritten notes, marks, attachment to different documents, or for any other reason) is a separate document to be produced. Each document that is attached by staple, clip or otherwise to a document requested herein, or referred to as an exhibit, appendix, schedule, amendment, rider or supplement to a requested document, shall also be produced (attached in the same manner as the original) regardless of whether the production of that document is otherwise requested herein. Each request herein for documents to be produced requires production of the documents in their entirety without abbreviation or expurgation.

5. Documents or Communications that "refer or relate to" a given subject are those that constitute, comprise, identify, deal with, contain, embody, reflect, state, comment on, describe, respond to, analyze or in any way pertain to that subject matter.

6. "Identify" when used in reference to a document means to confirm the existence of the document and describe the nature, custody, condition, location, and contents of the document.

7. "Identify" when used in reference to a natural person means to state that person's name, address and telephone number.

8. “Identify” when used in reference to an entity other than a natural person means to state the name of the entity, the present or last known address of the entity, and the legal nature of the entity (e.g., corporation, partnership, etc.).

9. “Net Worth” means the sum of all Your assets minus the sum of all Your liabilities.

10. “Person” or “entity” includes the plural as well as the singular and means any natural person, corporation, partnership, sole proprietorship, association, federation, or other recognizable entity unless the context indicates otherwise.

TOPICS FOR TESTIMONY

1. Your current Net Worth.

2. All accounts in Your name, for Your benefit or over which You have or had signature authority at any bank, foreign or domestic; brokerage or investment firm; or any other custodian, trustee or bailee.

3. The current value of any interest You have, whether direct or indirect, legal or beneficial, in any asset having a fair value of \$5,000 or greater as of the date of Your response, including without limitation any interest in any real property; corporate or similar entity; claims receivable; accounts receivable; intellectual property; motor vehicles, including without limitation automobiles, motorcycles, watercraft, and airplanes; cell towers, line time, or other telecommunications equipment; works of art, jewelry, antiques, wine collections, stamps, horses, or other similar personal property; publicly traded and privately held securities, whether debt or equity, including those currently held and outstanding option contracts or any other instruments or rights; commodities and commodity options; bank accounts, off-shore accounts, trust accounts, brokerage accounts, or other depository accounts; cash-on-hand; and all other assets of value of any kind or nature whatsoever.

4. The current amount of all of Your liabilities having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

5. The current value of liabilities that a person or entity owes to You having a value of \$5,000 or greater, including without limitation liens, credit relationships, accounts payable, and claims payable.

6. Any persons or entities who You believe have or had knowledge of Your assets or finances from January 1, 2023, to the present, including but not limited to accountants, bank representatives, securities brokers or account executives, financial advisors, trustees, partners, or business associates.

7. All Your transfers of assets having a value of \$5,000 or greater to any person from January 1, 2025, to the present date, including without limitation gifts of cash or goods, loans, or trust accounts.

8. All assets You claim are exempt from collection.

9. All current sources of income, including without limitation rental or leasing income, commissions, allowances, licensing fees, interest, dividends and capital gains.

10. The value of all insurance policies, including without limitation property insurance policies, in which You are the insured or the beneficiary or for which You pay or have paid the premiums, directly or indirectly.

EXHIBIT 2

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

-----X
In re: ELETSON HOLDINGS INC.,

: Chapter 11

: Case No. 23-10322 (JPM)

Debtor/Judgment Creditor.¹

:
-----X

CERTIFICATE OF SERVICE

I, Nathaniel R.B. Koslof, affirm as follows:

On October 24, 2025, I served true and correct copies of the foregoing Debtor/Judgment Creditor Eletson Holdings Inc.'s First Request for Production of Documents to Judgment Debtor Lassia Investment Company and Exhibit A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s First Request for Production of Documents to Judgment Debtor Family Unity Trust Company and Exhibit A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s First Request for Production of Documents to Judgment Debtor Glafkos Trust Company and Exhibit A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s First Request for Production of Documents to Judgment Debtor Elafonissos Shipping Corporation and Exhibit A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s Notice of Rule 30(b)(6) Deposition of Judgment Debtor Lassia Investment Company and Schedule A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s Notice of Rule 30(b)(6) Deposition of Judgment Debtor Family Unity Trust Company and Schedule A thereto; Debtor/Judgment Creditor Eletson Holdings Inc.'s Notice of Rule 30(b)(6) Deposition of Judgment Debtor Glafkos Trust Company and Schedule A thereto; and Debtor/Judgment Creditor Eletson Holdings Inc.'s Notice of Rule 30(b)(6) Deposition of

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.

Judgment Debtor Elafonissos Shipping Corporation and Schedule A thereto upon Lassia Investment Company, Family Unity Trust Company, Glafkos Trust Company, and Elafonissos Shipping Corporation c/o Rolnick Kramer Sadighi LLP by emailing the copies to Lawrence M. Rolnick at lrolnick@rksllp.com and by causing the copies to be sent via first class mail to the following address:

ROLNICK KRAMER SADIGHI LLP
Attn: Lawrence M. Rolnick
PENN 1, Suite 3401
One Pennsylvania Plaza
New York, NY 10119

Dated: October 24, 2025
New York, New York

/s/ Nathaniel R.B. Koslof
Nathaniel R.B. Koslof
Goulston & Storrs P.C.
One Post Office Square, 28th Floor
Boston, MA 02109
nkoslof@goulstonstorrs.com

Counsel for Eletson Holdings Inc.

EXHIBIT 3

From: Koslof, Nathaniel
Sent: Tuesday, November 25, 2025 12:19 PM
To: JPM.chambers@nysb.uscourts.gov
Cc: Furey, Jennifer; Berger, Rae; Grodin, Jaclyn; Lawrence Rolnick; Borriello, Jared; ioannis.zilakos@eletson.com; adrianos.psomadakis@gmail.com; adrianos.psomadakis@eletson.com; manolis.andreoulakis@eletson.com; Ljk@naftilosmaritime.com; Lascarina.karastamati@eletson.com; laskarinak@eletsonshipmanagement.com; vah@naftilosmaritime.com; vasilis.hadjieleftheriadis@eletson.com; panos.paxinos@eletson.com; Panagiotis.Paxinos@eletson.com; kostis.hadjieleftheriadis@eletson.com; j.markianos@daniolos.gr
Subject: In re Eletson Holdings, Inc., et al., Case No. 23-10322 (JPM)
Attachments: 2025.11.25 - PMC Ltr to Mastando re MTC Depositions.pdf
Categories: Filed to ND

Dear Chambers,

In the above-captioned matter, Eletson Holdings Inc. (“Holdings”) filed a letter requesting a conference in advance of its proposed motion to compel the Judgment Debtors (defined therein) to attend their respective post-judgment depositions. Pursuant to Chambers Rules, please find a copy of the of letter, filed today as docket entry 1894, attached.

Respectfully Submitted,
Nate

Nathaniel Koslof
(617) 574-0533
[Bio](#)

goulston&storrs

One Post Office Square, Boston, MA 02109
goulstonstorrs.com
nkoslof@goulstonstorrs.com

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