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*Counsel for Non-party Rolnick Kramer Sadighi LLP
and Judgment Debtors Lassia Investment Company,
Glafkos Trust Company, Family Unit Trust
Company, and Elafonissos Shipping Corporation*

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

In re:

ELETSON HOLDINGS INC. *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10322 (JPM)

(Jointly Administered)

**DECLARATION OF RICHARD BODNAR IN SUPPORT OF REPLY IN SUPPORT OF
MOTION OF ROLNICK KRAMER SADIGHI LLP, LASSIA INVESTMENT
COMPANY, GLAFKOS TRUST COMPANY, FAMILY UNIT TRUST
COMPANY, AND ELAFONISSOS SHIPPING CORPORATION
TO QUASH OR, IN THE ALTERNATIVE, FOR A PARTIAL PROTECTIVE ORDER**

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, 1177 Avenue of the Americas, New York, NY 10036.



Pursuant to 28 U.S.C. § 1746, I, Richard Bodnar, hereby affirm the following:

1. I am a partner at Rolnick Kramer Sadighi, LLP (“RKS”), which represents the Lassia Investment Company, Glafkos Trust Company, Family Unit Trust Company, and Elafonissos Shipping Corporation (the “Foreign Shareholders”).

2. I submit this declaration in support of RKS’s and the Foreign Shareholders’ reply in support of their motion to quash, or for a partial protective order against, reorganized Eletson Holdings Inc.’s (“REH”) information subpoenas (“Subpoenas”) to RKS and Reed Smith, LLP.

3. On November 12, 2025, my colleague Justin Harris and I represented RKS and the Foreign Shareholders on a teleconference with counsel to REH, Nathaniel Koslof and Rae Berger. During the meeting, the parties met and conferred concerning the Subpoenas and notices of the depositions of the Foreign Shareholders. At the meeting, both sides conferred in good faith concerning the Subpoenas and deposition notices, but did not reach an agreement.

4. To the best of my recollection, while discussing the Subpoenas, I mentioned that the Subpoenas were improper, improper as to the law firms, that its questions raised privilege concerns, and that we did have any objections concerning service of these information subpoenas on RKS or Reed Smith. Also, Mr. Koslof confirmed his view that RKS had satisfied its meet-and-confer obligations during the meeting.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 12, 2025
New York, New York

Respectfully submitted,

/s/ Richard Bodnar

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