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**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 JUSTIN B. HARRIS IN SUPPORT OF
LASSIA INVESTMENT COMPANY'S, GLAFKOS TRUST COMPANY'S, FAMILY
UNIT TRUST COMPANY'S, AND ELAFONISSOS SHIPPING CORPORATION'S
OPPOSITION TO REORGANIZED ELETSON HOLDINGS INC.'S
MOTION TO COMPEL THE ENTITY JUDGMENT DEBTORS' DEPOSITIONS
IN AID OF JUDGMENT ENFORCEMENT**

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, Justin Harris, hereby affirm the following:

1. I am an associate 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 the Foreign Shareholders’ opposition to reorganized Eletson Holdings Inc.’s (“REH”) motion to compel the depositions of the Foreign Shareholders.

3. On October 29, 2025, RKS received discovery requests intended for the Foreign Shareholders, including notices of their depositions, through the mail. The deposition notices were not accompanied by subpoenas.

4. On November 7, 2025, I emailed counsel to REH regarding the Foreign Shareholders’ objections to the notices of their depositions. A true and correct copy of that email is attached hereto as **Exhibit A**.

5. On November 12, 2025, my colleague Richard Bodnar and I represented the Foreign Shareholders on a teleconference with counsel to REH, Nathaniel Koslof and Rae Berger. During the meeting, the parties met and conferred concerning REH’s information subpoenas to RKS and Reed Smith LLP and REH’s 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.

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

Dated: December 22, 2025
New York, New York

Respectfully submitted,

/s/ Justin Harris

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EXHIBIT A

Justin Harris

From: Justin Harris
Sent: Friday, November 7, 2025 4:21 PM
To: Grodin, Jaclyn; Koslof, Nathaniel; jfurey@goulstonstrorrs.com
Cc: Richard Bodnar; Frank Catalina; Lawrence Rolnick
Subject: In re Eletson Holdings, Inc., 23-10322 (JPM) - Discovery from Foreign Shareholders

Counsel,

We are counsel to Lassia Investment Company, Glafkos Trust Company, Family Unit Trust Company, and Elafonissos Shipping Corporation (the "Foreign Shareholders"). You have purported to serve discovery on these entities, including purported deposition notices, via RKS. You did so without inquiring as to whether RKS is authorized to accept such service, and we are not. As Mr. Catalina previously informed you, RKS is not some sort of general agent for the Foreign Shareholders.

The Foreign Shareholders have not been served with the discovery you purportedly propounded.

Even if the Foreign Shareholders are deemed served, they object to any deposition dates that you unilaterally schedule in New York without first confirming their availability (nor did you attempt to confer as to the availability of anyone).

Further, all discovery sought relates to orders that are on appeal to supervisory courts above the bankruptcy court whose authority you invoke. The Foreign Shareholders object to this abuse of the discovery process.

The Foreign Shareholders will not sit for depositions next week. If they are properly served discovery directly, and so instruct RKS, we will revisit dates for depositions at an appropriate time.

As an accommodation, RKS is prepared to provide responses to the document discovery demands made—even though not properly served—and will do so reserving all rights.

Best,
Justin

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