

**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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**ELETSON HOLDINGS INC.'S MOTION TO COMPEL THE INDIVIDUAL  
JUDGMENT DEBTORS' COMPLIANCE WITH POST-JUDGMENT  
INTERROGATORIES AND DOCUMENT REQUESTS  
IN AID OF JUDGMENT ENFORCEMENT**

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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.



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Pursuant to Federal Rules of Civil Procedure (“Fed. R. Civ. P.”) 37 and 69, made applicable by Federal Rules of Bankruptcy Procedure (“Fed. R. Bankr. P.”) 7037, 7069, and 9014, judgment creditor Eletson Holdings Inc. (“Holdings”) respectfully submits this motion for entry of an order, substantially in the form attached hereto as **Exhibit A** (“Proposed Order”), compelling judgment debtors Laskarina Karastamati, Vasilis Hadjieleftheriadis a/k/a Vassilis Chatzieleftheriadis, Konstatinos Chatzieleftheriadis, Ionannis Zilakos, Niki Zilakos, Adrianos Psomadakis-Karastamatis, Eleni Giannakopoulous, Panos Paxinoz, and Emmanuel Andreulaks (the “Individual Judgment Debtors”) to respond to the post-judgment interrogatories dated October 27, 2025 (the “Interrogatories”) and document requests dated October 27, 2025 (the “Document Requests” and, together with the Interrogatories, the “Written Discovery Requests”) served on them in aid of judgment enforcement.

### **PRELIMINARY STATEMENT**

On September 22 and October 21, 2025, the Court entered judgments against the Individual Judgment Debtors as well as against Lassia Investment Company, Glafkos Trust Company, Family Unity Trust Company, and Elafonissos Shipping Corporation (the “Entity Judgment Debtors” and, together with the Individual Judgment Debtors, the “Judgment Debtors”) in favor of Holdings (the “Judgments”). Dkt. Nos. 1836, 1862. The Judgments ordered the Judgment Debtors to pay Holdings amounts ranging from \$150,000 to \$1,931,548.12. *See id.*

Upon entry of the Judgments, Holdings served post-judgment discovery aimed at obtaining information about the nature and location of the Judgment Debtors’ assets and identifying assets to satisfy the Judgments. The post-judgment discovery that Holdings served included, *inter alia*, the Written Discovery Requests that are the subject of the instant motion.

*None* of the Individual Judgment Debtors responded to any of the Written Discovery Requests by the deadline to do so. In fact, neither the Individual Judgment Debtors (nor any counsel that may represent them) have responded to any outreach from Holdings regarding the Written Discovery Requests.

The Individual Judgment Debtors' failure to respond to Holdings' Written Discovery Requests—which are properly tailored to request information and documents concerning the Individual Judgment Debtors' assets and liabilities for purposes of satisfying the Judgments—has interfered, and continues to interfere, with Holdings' ability to gather information essential to its enforcement and collection efforts, information to which Holdings plainly is entitled.

As a result of the Individual Judgment Debtors' failure to respond to the Written Discovery Requests, Holdings respectfully requests that the Court enter an order compelling the Individual Judgment Debtors to comply with and produce information and documents responsive to the Written Discovery Requests.

### **BACKGROUND**

#### **A. Service of the Interrogatories and Document Requests on the Individual Judgment Debtors and their Failure to Comply Therewith**

On October 27, 2025, Holdings served the Written Discovery Requests on each Individual Judgment Debtor pursuant to Fed. R. Civ. P. 33 (as to the Interrogatories) and Fed. R. Civ. P. 34 (as to the Document Requests), which are made applicable by Fed. R. Bankr. P. 7033, 7034, and 9014. *See* Koslof Decl. Ex. 1 (Interrogatories); Koslof Decl. Ex. 2 (Document Requests).<sup>2</sup>

Holdings properly served the Written Discovery Requests by both first-class mail and email at each Individual Judgment Debtor's known address and email address, as well as on the Daniolos

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<sup>2</sup> References to "Koslof Decl. Ex. \_\_\_" refer to exhibits to the Declaration of Nathaniel R.B. Koslof, dated December 23, 2025 ("Koslof Decl.").

Law Firm by both first-class mail and email.<sup>3</sup> See Koslof Decl. Ex. 3 (certificate of service); Koslof Decl. Ex. 4 (email chains with October 27, 2025 emails to Individual Judgment Debtors and Daniolos Law Firm attaching Written Discovery Requests). The Written Discovery Requests confirmed, in accordance with Fed. R. Civ. P. 33 and 34, that the deadline for each Individual Judgment Debtor to respond to the Written Discovery Requests was 30 days from the date of service thereof. As service made by mail, as here, is “complete *upon mailing*,” the Individual Judgment Debtors’ deadline to respond to the Written Discovery Requests fell on November 28, 2025, 30 days from mailing.<sup>4</sup> See Fed. R. Bankr. P. 9006(e) (“Service by mail of process, any other document, or notice is complete *upon mailing*”) (emphasis added); see also Fed. R. Civ. P. 5(b)(2)(C) (permitting service of a discovery paper by “mailing it to the person’s last known address—in which event service is complete upon mailing”).

On November 4, 2025, Holdings sent follow-up emails to each Individual Judgment Debtor, with the Daniolos Law Firm copied, attaching the Written Discovery Requests; reiterating the November 28, 2025 response deadline; inquiring as to whether each Individual Judgment Debtor is personally represented by counsel in connection with this discovery; and reserving all rights. See Koslof Decl. Ex. 4 (email chains with November 4, 2025 emails to Individual Judgment Debtors

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<sup>3</sup> Holdings was unable to ascertain individual email addresses for two of the Individual Judgment Debtors, Eleni Giannakopoulous and Niki Zilakos. Thus, Holdings served these two individuals at their known addresses as well as at the known address and email address of the Daniolos Law Firm. To be sure, Rolnick Kramer Sadighi LLP and Greenberg Traurig LLP have both disclaimed representation of the Individual Judgment Debtors. Further, Holdings inquired with the Individual Judgment Debtors and the Daniolos Law Firm as to whether the Daniolos Law Firm, or any other law firm, represents the Individual Judgment Debtors but did not, and still has not, received a response.

<sup>4</sup> Holdings caused the Written Discovery Requests to be put in the mail on October 27, 2025. However, Holdings’ counsel was informed by its mailing department that the mail went out the next day, on October 28, 2025. Thus, Holdings calculated the Individual Judgment Debtors’ 30-day deadline from October 28, 2025. As that date landed on Thanksgiving, the response deadline fell to the next day, November 28, 2025. See Fed. R. Bankr. P. 9006(a)(1)(C) (“[I]n computing any time period, . . . include the last day of the period, but if the last day is a . . . legal holiday, the period continues to run until the end of the next day that is not a . . . legal holiday”). To be sure, Fed. R. Bankr. P. 9006(f) states that “[w]hen a party may or must act within a specified time after being served and service is made by mail . . . , 3 days are added after the period would otherwise expire[.]” However, the Individual Judgment Debtors failed to even respond by that date, which was December 1, 2025, and still have not responded.

and Daniolos Law Firm). Holdings did not hear back, and to date still has not heard back, from any Individual Judgment Debtor.

*None* of the Individual Judgment Debtors responded to the Written Discovery Requests by the November 28, 2025 deadline and still have not responded to date.

**B. Good Faith Effort to Meet and Confer Pursuant to Applicable Rules**

On December 3, 2025—after having not heard from the Individual Judgment Debtors (or any counsel that may represent them) by the November 28, 2025 deadline—Holdings *again* emailed each Individual Judgment Debtor copying the Daniolos Law Firm, pursuant to Your Honor’s Chambers’ Rules and Local Bankruptcy Rule 7037-1, to schedule a meet and confer to resolve the Individual Judgment Debtors’ failures to respond to the Written Discovery Requests. *See* Koslof Decl. Ex. 4 (email chains with December 3, 2025 emails to Individual Judgment Debtors and Daniolos Law Firm). In each email, Holdings re-attached the Written Discovery Requests; reiterated the response deadline; and said that, if it did not hear back by December 5, 2025, it would move to compel. *Id.*; *See* Koslof Decl. ¶ 9 (attorney affirmation pursuant to Local Bankruptcy Rule 7037-1(a) certifying good faith effort to confer with the Individual Judgment Debtors to resolve the issues raised in the instant motion and failure to receive a response). To date, Holdings has not heard from the Individual Judgment Debtors (or any counsel that may represent them).

**C. Letter Request for Conference Pursuant to Applicable Rules**

On December 17, 2025, in compliance with the Court’s Chambers’ Rules and Local Bankruptcy Rule 7037-1, Holdings filed a letter requesting a conference in anticipation of the instant motion or, alternatively, leave to file the instant motion. Dkt. No. 1919. That same day, Holdings emailed a copy of the letter to Chambers, the Entity Judgment Debtors’ counsel, and the Individual Judgment Debtors. *See* Koslof Decl. Ex. 5 (email attaching pre-motion conference

letter requesting file motion to compel); Dkt. No 1924 (affidavit of service). On December 19, 2025, at the conclusion of a hearing on a separate matter, the Court orally granted Holdings leave to file the instant motion.

As a result of the Individual Judgment Debtors' failure to respond to the Written Discovery Requests properly served upon them, Holdings asks the Court to enter an order compelling the Individual Judgment Debtors to produce information and documents responsive to the Written Discovery Requests.<sup>5</sup> *See* Fed. R. Civ. P. 37.

### **ARGUMENT**

#### **I. HOLDINGS IS ENTITLED TO RESPONSES TO ITS INTERROGATORIES AND DOCUMENT REQUESTS IN AID OF THE JUDGMENTS' ENFORCEMENT AND EXECUTION**

"Post-judgment discovery is governed by Federal Rule of Civil Procedure 69, which provides that '[i]n aid of the judgment or execution, the judgment creditor...may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located.'" *EM Ltd. v. Rep. of Argentina*, 695 F.3d 201, 207 (2d Cir. 2012) (quoting Fed. R. Civ. P. 69(a)(2)).

It is well-recognized that "broad post-judgment discovery in aid of execution is the norm in federal and New York state courts." *Id.* Indeed, under Fed. R. Civ. P. 69, made applicable here by Fed. R. Bankr. P. 7069 and 9014, a judgment creditor has "wide latitude in using the discovery devices provided by the Federal Rules in post-judgment proceedings" and "is entitled to a wide range of discovery concerning the assets and liabilities of a judgment debtor" to aid in collecting

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<sup>5</sup> To comply with Local Bankruptcy Rule 7033-1(e) and 7034-1(a)'s requirement that any request for relief with respect to interrogatories or document requests "specify and quote verbatim in the request or moving papers each relevant [document request or interrogatory] and, immediately following each specification, set forth the basis of the...relief requested," Holdings has prepared a chart attached hereto as **Exhibit B** that sets forth the verbatim language of each of the Interrogatories and Document Requests in one column and summarizes the relief requested and basis for such relief (which is set forth in further detail in the instant motion) in a corresponding column.



on a judgment. *Rep. of Guatemala v. IC Power Asia Dev. Ltd.*, 2023 WL 3294277, at \*2 (S.D.N.Y. May 5, 2023) (cleaned up); *Libaire v. Kaplan*, 760 F.Supp.2d 288, 293 (E.D.N.Y. 2011) (“A [judgment creditor] is entitled to a very thorough examination of a judgment debtor with respect to its assets.”) (cleaned up). This includes the right to “seek disclosure related to assets held outside the jurisdiction of the court where the discovery request is made.” *EM Ltd.*, 695 F.3d at 208 (collecting cases allowing broad discovery into judgment debtors’ assets regardless of location).

Fed. R. Civ. P. 26, which governs the scope of discovery under the federal rules, states that “[p]arties may obtain discovery *regarding any nonprivileged matter* that is relevant to any party’s claim or defense and proportional to the needs of the case[.]” Fed. R. Civ. P. 26(b)(1); *see* Fed. R. Civ. P. 33 and 34 (permitting interrogatories and document requests that fall within the scope of Fed. R. Civ. P. 26(b)). In the broad post-judgment discovery context, the principal consideration as to scope is whether the discovery sought is “calculated to assist in collecting on a judgment.” *See e.g.*, *EM Ltd.*, 695 F.3d at 207 (citing Fed. R. Civ. P. 26(b)(1) and 69(a)(2)).

Here, the Written Discovery Requests are proper in scope and seek information and documents that Holdings is entitled to concerning the nature, identity, and location of the Judgment Debtors’ assets and liabilities. Indeed, the Written Discovery Requests seek information and documents generally pertaining to the following categories: (1) current asset ownership and value; (2) current liabilities incurred or owed; (3) recent asset transfers or other disposition of assets; (4) net worth; (5) current income sources; (6) bank accounts, trusts, and the value thereof; (7) real estate ownership; and (8) insurance policies and the value thereof. *See* Koslof Decl. Ex. 1 (Interrogatories); Koslof Decl. Ex. 2 (Document Requests). In this way, the Written Discovery Requests are relevant and narrowly tailored to collecting on the Judgments, plainly are proper under Fed. R. Civ. P. 69, and seek essential information that Holdings is entitled to in order to

enforce the Judgments.<sup>6</sup> *See e.g., Libaire*, 760 F.Supp.2d at 293–94 (finding post-judgment subpoena for documents regarding, *inter alia*, real property, bank and credit card statements, loans, asset ownership, life insurance policies, and pensions to be “clearly relevant and necessary in that [the requests] pertain[ed] to [the judgment debtor’s] assets and liabilities” and were “sufficiently tailored” particularly given “the wide latitude afforded...under Rule 69”).

## **II. AN ORDER COMPELLING THE INDIVIDUAL JUDGMENT DEBTORS TO RESPOND TO THE INTERROGATORIES AND DOCUMENT REQUESTS IS PROPER**

Fed. R. Civ. P. 37(a), made applicable by Fed. R. Bankr. P. 7037 and 9014, permits a judgment creditor to move for an order compelling a judgment debtor’s compliance with post-judgment discovery interrogatories and document requests. *See* Fed. R. Civ. P. 37(a)(1) (“[A] party may move for an order compelling disclosure or discovery.”); Fed. R. Civ. P. 37(a)(3)(B) (“A party seeking discovery may move for an order compelling an answer, designation, production, or inspection...if:...a party fails to answer an interrogatory submitted under Rule 33 [or] fails to produce documents...as requested under Rule 34.”).

Courts have granted motions to compel compliance with post-judgment written discovery requests where, as here, the requests seek documents and information aimed at identifying suitable assets to satisfy the judgments. *See, e.g., U.S. Bancorp Equip. Fin., Inc. v. Babylon Transit, Inc.*, 270 F.R.D. 136, 140-41 (E.D.N.Y. 2010) (granting motion to compel responses to post-judgment interrogatories and document requests that “relate[d] to executing the judgment” and “thus...[e]ll within the scope of permissible discovery”); *Gibbons v. Smith*, 2010 WL 582354, at \*3 (S.D.N.Y. Feb. 11, 2010) (granting motion to compel responses to post-judgment interrogatories and

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<sup>6</sup> To be sure, the Document Requests also comply with Fed. R. Civ. P. 34(b)(1)’s content requirements in that the requests “describe with reasonable particularity each item or category of items to be inspected” and “specify a reasonable time” for compliance in accordance with the 30 days permitted under Fed. R. Civ. P. 34(b)(2)(A).

document requests concerning discovery of judgment debtor's assets). "Further, under Rule 37(a), if the court grants the motion to compel, the court also may require the non-compliant party to pay the attorney's fees and costs incurred by the moving party in making the motion to compel." *Banco Cent. De Paraguay v. Paraguay Humanitarian Found., Inc.*, 2006 WL 3456521, at \*8 (S.D.N.Y. Nov. 30, 2006).

Fed. R. Civ. P. 37(a)(1) requires that the movant provide "notice to other parties and all affected persons" of the motion and that the motion include "a certification that the movant has in good faith conferred or attempted to confer with the person or party failing to make disclosure or discovery in an effort to obtain it without court action." *See* Fed. R. Civ. P. 37(a)(1).

As set forth in Sections B-C, *supra*, Holdings provided the requisite notice of the instant motion to all parties. *See e.g.*, Koslof Decl. Ex. 4 (email chains with December 3, 2025 emails to Individual Judgment Debtors, with Daniolos Law Firm copied, noting that "if we do not hear back from you by December 5, 2025, *we will take the necessary steps to move to compel your compliance*") (emphasis added); Koslof Decl. Ex. 5 (December 17, 2025 email attaching pre-motion conference letter requesting to file motion to compel, copying Individual Judgment Debtors, Daniolos Law Firm, and counsel for the Entity Judgment Debtors); Dkt. No 1924 (affidavit of service). Holdings also has certified its good faith efforts to confer with the Individual Judgment Debtors. *See* Koslof Decl. ¶ 9 (certifying good faith effort to meet and confer with Individual Judgment Debtors); *see also* Koslof Decl. Ex. 4 (email chains with December 3, 2025 emails to Individual Judgment Debtors requesting to meet and confer).

Furthermore, Holdings properly served the Written Discovery Requests on the Individual Judgment Debtors in compliance with Fed. R. Civ. P. 5. *See* Fed. R. Civ. P. 5(b)(2)(C) (permitting service of a discovery paper by "mailing it to the person's last known address—in which event

service is complete upon mailing”). As set forth in Section A, *supra*, Holdings properly served the Written Discovery Requests on each Individual Judgment Debtor by both first-class mail and email at each Individual Judgment Debtor’s last known addresses. *See* Koslof Decl. Ex. 3 (certificate of service).

This Court has previously approved the propriety of the aforementioned methods of service on the Individual Judgment Debtors. *See* Dkt. No. 1505 at 92:3-6 (finding “service...by direct mail and email to former directors, shareholders, and their respective attorneys to be sufficient notice.”).

In light of the Individual Judgment Debtors’ failures to respond to the Written Discovery Requests, which were properly served upon them and plainly seek discoverable information that Holdings is entitled to, the instant motion to compel is proper.

### **CONCLUSION**

For the foregoing reasons, Holdings’ respectfully requests that the Court grant Holding’s motion to compel and enter an order, substantially in the form of the Proposed Order, compelling the Individual Judgment Debtors to respond to the Written Discovery Requests within fourteen (14) days after entry of said order and such other relief as the Court deems necessary.

Dated: December 23, 2025

/s/ Nathaniel R.B. Koslof

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*Counsel for Eletson Holdings Inc.*

# **EXHIBIT A**

**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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**ORDER GRANTING ELETSON HOLDINGS INC.’S MOTION TO COMPEL  
THE INDIVIDUAL JUDGMENT DEBTORS’ COMPLIANCE WITH  
POST-JUDGMENT INTERROGATORIES AND DOCUMENT REQUESTS  
IN AID OF JUDGMENT ENFORCEMENT**

Upon the motion of Eletson Holdings Inc. (“Holdings”), pursuant to Fed. R. Civ. P. 37 and 69, made applicable by Fed. R. Bankr. P. 7037, 7069, and 9014, for entry of an order compelling judgment debtors Laskarina Karastamati, Vasilis Hadjieleftheriadis a/k/a Vassilis Chatzieleftheriadis, Konstatinos Chatzieleftheriadis, Ionannis Zilakos, Niki Zilakos, Adrianos Psomadakis-Karastamatis, Eleni Giannakopoulous, Panos Paxinoz, and Emmanuel Andreulaks (the “Individual Judgment Debtors”) to respond to the post-judgment interrogatories dated October 27, 2025 (the “Interrogatories”) and document requests dated October 27, 2025 (the “Document Requests” and, together with the Interrogatories, the “Written Discovery Requests”) served on them in aid of judgment enforcement, as well upon all the accompanying papers, and after a hearing on the motion held on January 20, 2026, it is **HEREBY ORDERED THAT:**

1. The motion is **GRANTED**;

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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.

2. The Individual Judgment Debtors are ordered to respond to and produce information and documents responsive to the Written Discovery Requests within fourteen (14) days after entry of this order; and
3. The Individual Judgment Debtors shall pay Holdings' attorney's fees and costs incurred in making the instant motion.

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
Hon. John P. Mastando III  
United States Bankruptcy Judge



## **EXHIBIT B**

**Exhibit B** <sup>1</sup>

Interrogatories	
Interrogatory	Relief Requested and Basis Thereof <sup>2</sup>
1. State Your current Net Worth, excepting the Judgment owed. If You are a corporation, company of any type, or trust, You may respond to this Interrogatory by producing a copy of your most recent balance sheet.	<p><b>Relief Requested:</b> Pursuant to Fed. R. Civ. P. 37 and 69, made applicable by Fed. R. Bankr. P. 7037, 7069, and 9014, Holdings respectfully requests that the Court enter an order compelling the Individual Judgment Debtors to produce information responsive to this interrogatory.</p> <p><b>Basis for Relief:</b> The Individual Judgment Debtors have failed to respond to this interrogatory which was properly served on them, is relevant and narrowly tailored to collecting on the Judgments, and complies with all applicable rules as discussed in the Motion. <i>See</i> Motion at 5-7. A motion to compel under Fed. R. Civ. P. 37 is proper and Holdings has complied with all applicable requirements. <i>See id.</i> at 7-9.</p>
2. Identify 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, specifying for each the name and address of the	Same as above.

<sup>1</sup> The language of each interrogatory and document request appearing in the lefthand column of each chart herein is copied verbatim from the Interrogatories and Document Requests (as defined in Eletson Holdings Inc.'s Motion to Compel the Individual Judgment Debtors' Compliance with Post-Judgment Interrogatories and Document Requests in Aid of Judgment Enforcement (the "Motion")), copies of which are included as Exhibit 1 and Exhibit 2 to the Declaration of Nathaniel R.B. Koslof in Support of Eletson Holdings Inc's Motion to Compel the Individual Judgment Debtors' Compliance with Post-Judgment Interrogatories and Document Requests in Aid of Judgment Enforcement, dated December 23, 2025.

<sup>2</sup> Capitalized terms used in this column are defined in the Motion.

Interrogatories	
Interrogatory	Relief Requested and Basis Thereof <sup>2</sup>
individual or institution, the account number, the assets currently held and their current fair value.	
3. Identify and state 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.	Same as above.
4. Identify and state the current amount of all of Your liabilities having a value of \$5,000 or greater as of the date of Your response, including without limitation liens, credit relationships, accounts payable, and claims payable.	Same as above.
5. Identify and state the current value of liabilities that a person or entity owes to You having a value of \$5,000 or greater as of the date of Your response, including without limitation liens, credit relationships, accounts payable, and claims payable. If You are a corporation, company of any type, or trust, You may respond to	Same as above.

Interrogatories	
Interrogatory	Relief Requested and Basis Thereof <sup>2</sup>
this Interrogatory by producing a copy of your most recent balance sheet.	
6. Identify 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.	Same as above.
7. Identify 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.	Same as above.
8. Identify all assets You claim are exempt from collection, providing for each such asset a description of the asset, the current fair value of the asset or a good faith approximation thereof, a statement of when and where the asset was obtained, and an explanation of the basis for the claimed exemption.	Same as above.
9. Identify all current sources of income, including without limitation rental or leasing income, commissions, allowances, licensing fees, interest, dividends and capital gains.	Same as above.
10. Identify and state 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.	Same as above.

Document Requests	
Request	Relief Requested and Basis Thereof <sup>3</sup>
<p><b><u>Request No. 1:</u></b> All Financial Records concerning any and all accounts in Your name, for Your benefit in which You have any form of ownership interest whatsoever, at any bank, brokerage or investment firm or other financial institution, wherever located in the world; specifying for each the name and address of the financial institution, the account number, the assets currently held and their current fair value.</p>	<p><b>Relief Requested:</b> Pursuant to Fed. R. Civ. P. 37 and 69, made applicable by Fed. R. Bankr. P. 7037, 7069, and 9014, Holdings respectfully requests that the Court enter an order compelling the Individual Judgment Debtors to produce documents responsive to this request.</p> <p><b>Basis for Relief:</b> The Individual Judgment Debtors have failed to respond to this request which was properly served on them, is relevant and narrowly tailored to collecting on the Judgments, and complies with all applicable rules as discussed in the Motion. <i>See</i> Motion at 5-7. A motion to compel under Fed. R. Civ. P. 37 is proper and Holdings has complied with all applicable requirements. <i>See id.</i> at 7-9.</p>
<p><b><u>Request No. 2:</u></b> To the extent not produced in response to Request No. 1, all Documents concerning any Asset in which you have any ownership interest of any type whatsoever, wherever in the world such Asset may be located.</p>	<p>Same as above.</p>
<p><b><u>Request No. 3:</u></b> Any net worth statement or similar Document showing assets and liabilities that you have prepared or that has been prepared for you in the last three (3) years.</p>	<p>Same as above.</p>
<p><b><u>Request No. 4:</u></b> To the extent not produced in response to Requests Nos. 1 and 2, all Documents relating to any real estate, wherever located in the world, in which you hold any direct or indirect ownership interest of any type whatsoever, including any</p>	<p>Same as above.</p>

<sup>3</sup> Capitalized terms used in this column are defined in the Motion.

Document Requests	
Request	Relief Requested and Basis Thereof <sup>3</sup>
home, office or investment real estate.	
<b><u>Request No. 5:</u></b> All documents concerning any trust as to which You are a beneficiary.	Same as above.
<b><u>Request No. 6:</u></b> All Documents concerning any trust as to which You are a grantor.	Same as above.
<b><u>Request No. 7:</u></b> All Documents concerning any insurance policy of which You are an owner, insured or beneficiary.	Same as above.
<b><u>Request No. 8:</u></b> All Documents relating to payment of any attorney who has represented You in any matter related, directly or indirectly, to Eletson Holdings Inc., including checks, wire transfer records and any other payment instructions.	Same as above.
<b><u>Request No. 9:</u></b> If You have transferred any Asset, wherever located in the world, to any person or entity of any type whatsoever in the last three (3) years, all Documents concerning such transfer or transfers.	Same as above.
<b><u>Request No. 10:</u></b> If You are a natural person, a list of all persons or entities, including without limitation children, parents, spouses and/or partners, to whom You have provided financial support of any type whatsoever in the last three (3) years, including the amounts of such support You have provided and the Documents concerning such transfers.	Same as above.