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March 26, 2026

VIA ECF

The Honorable John P. Mastando III
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

Re: *In re Eletson Holdings, Inc., et al., Case No. 23-10322 (JPM)*

Dear Judge Mastando,

We write on behalf of Eletson Holdings Inc. (“Holdings”). Pursuant to Your Honor’s Chambers’ Rules and Local Bankruptcy Rule 7037-1, Holdings respectfully requests a conference in anticipation of filing a motion to compel (the “Anticipated Motion”) judgment debtor Vassilis Kertsikoff (“Kertsikoff”) to respond to Holdings’ post-judgment interrogatories dated January 9, 2026, attached hereto as **Exhibit A**, and requests for the production of documents dated January 9, 2026, attached hereto as **Exhibit B** (collectively, the “Requests”). Alternatively, Holdings respectfully requests leave to file the Anticipated Motion without a conference.

Written Discovery Served on Vassilis Kertsikoff

This Court entered a judgment in favor of Holdings and against Kertsikoff dated December 30, 2025 (Dkt. No. 1933) (the “Judgment”). Upon entry of the Judgment, Holdings served post-judgment discovery, including the Requests.

On January 9, 2026, Holdings served the Requests on Kertsikoff pursuant to Fed. R. Civ. P. 33 and 34 (made applicable by Fed. R. Bankr. P. 7033, 7034, and 9014). Holdings properly served the Requests by both first-class mail and email at Kertsikoff’s known addresses and email addresses. The Requests confirmed that, in accordance with Fed. R. Civ. P. 33 and 34, the deadline to respond to the Requests was 30 days from the date of service thereof. As service made by mail, as here, is “complete *upon mailing*,” Kertsikoff’s deadline to respond to the Requests fell on February 12, 2026, 30 days from mailing plus three days to account for mail service.¹ See Fed. R. Bankr. P. 9006(e)-(f).

¹ 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[.]” Thus, Holdings added three (3) additional days to Kertsikoff’s 30-day deadline to respond, bringing the deadline to February 12, 2026.



The Honorable John P. Mastando III
March 26, 2026
Page 2 of 2

Kertsikoff did not respond to the Requests by the deadline and still has not responded to the Requests or otherwise reached out to Holdings (either directly or through any counsel that may represent him), to date.²

On March 25, 2026, Holdings emailed Kertsikoff, copying Solomon Shinerock of Morrison Cohen LLP, pursuant to Your Honor's Chambers' Rules and Local Bankruptcy Rule 7037-1, to schedule a meet and confer to resolve Kertsikoff's failure to respond to the Requests. In the email, Holdings re-attached the Requests, reiterated the response deadline, and said that, if it did not hear back by March 26, 2026 at 10:00 am EST, it would move to compel. To date, Holdings has not heard from Kertsikoff (or any counsel that may represent him on this matter).

Basis for Motion to Compel

“In the 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.” Fed. R. Civ. P. 69(a)(2). 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.” *Rep. of Guatemala v. IC Power Asia Dev. Ltd.*, 2023 WL 3294277 at *2 (S.D.N.Y. May 5, 2023). Here, the Requests relate to Kertsikoff's assets and liabilities, are narrowly tailored to collecting on the Judgment, and seek essential information that Holdings is entitled to in order to enforce the Judgment.

Furthermore, Fed. R. Civ. P. 37(a), made applicable by Fed. R. Bankr. P. 7037 and 9014, allows a judgment creditor to move to compel a judgment debtor's compliance with post-judgment discovery requests. *See* Fed. R. Civ. P. 37(a)(1) and (a)(3)(B); *see, e.g., U.S. Bancorp Equip. Fin., Inc. v. Babylon Transit, Inc.*, 270 F.R.D. 136, 141 (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”).

Accordingly, Holdings respectfully requests leave to file a motion to compel Kersikoff to produce information and documents responsive to Holdings' Requests pursuant to Fed. R. Civ. P. 37 and 69 (made applicable by Fed. R. Bankr. P. 7037, 7069, and 9014).

Respectfully submitted,

/s/ Nathaniel R.B. Koslof

Nathaniel R.B. Koslof

cc: All Counsel (via ECF); Vassilis Kertsikoff (via email and first-class mail)

² Morrison Cohen LLP and Greenberg Traurig LLP have each disclaimed representation of Kertsikoff in connection with this post-judgment discovery.

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.¹ :
-----X

**DEBTOR/JUDGMENT CREDITOR ELETSON
HOLDINGS INC.'S FIRST POST-JUDGMENT
INTERROGATORIES TO JUDGMENT DEBTOR VASSILIS KERTSIKOFF**

TO: **Vassilis Kertsikoff**, by first class mail at 49 El. Venizelou Street, Filothei, Attica 15237, Greece and at 118 Kolokotroni Street, GR 185 35, Piraeus, Greece; and by email at vassilis.kertsikoff@eletson.com and vaskerts@hotmail.com

Pursuant to Federal Rule of Bankruptcy Procedure 7069 and Federal Rules of Civil Procedure 69(a)(2) and 33(a), Debtor/Judgment Creditor Eletson Holdings Inc. (“Holdings”) requests that Judgment Debtor Vassilis Kertsikoff answer the following Interrogatories no later than 30 days from date of service hereof. A true and correct copy of the sworn answers is to be served on the undersigned attorneys for Holdings.

These Interrogatories relate to the Judgment issued by the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) on December 30, 2025, in the above-captioned case requiring the payment to Holdings by the aforesaid Judgment Debtor of \$162,000 (Bankr. Dkt. No. 1933, copy attached as **Exhibit A**). The Judgment provides that Holdings “shall have the immediate right to enforce and execute this Judgment without further notice, stay or action, and this Judgment is final and enforceable.”

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.

INSTRUCTIONS AND DEFINITIONS

The following instructions and definitions are applicable to each Interrogatory unless otherwise explicitly stated. Any terms not otherwise defined shall be given their plain and ordinary meaning.

INSTRUCTIONS

1. Each of these Interrogatories is to be read, construed, and answered separately and independently without reference to or being limited by any other Interrogatory.

2. The terms “and” and “or” are to be construed either disjunctively or conjunctively, whichever will bring within the scope of these Interrogatories any information or documents relevant to this suit which otherwise might be considered beyond their scope.

3. The singular form of a word is to be interpreted as plural, and the plural form of a word shall be interpreted as singular, whichever will bring within the scope of these Interrogatories any information or documents relevant to this suit which might otherwise be considered beyond their scope.

4. Respond to each Interrogatory in writing, preceded by the Interrogatory to which each response applies. Respond completely to each of these Interrogatories based upon all information reasonably available to You or Your attorney at the time Your responses are made.

5. If You object to any Interrogatory herein, pursuant to Federal Rule of Civil Procedure 33(b)(4) state specifically and in writing the legal or factual basis for the objection and the extent to which You are refusing to comply with the Interrogatory. Respond to all portions of the Interrogatory to which You have not objected.

6. If You claim that information responsive to any Interrogatory or portion thereof is privileged or subject to protection, state: (a) what information responsive to the request has been

withheld; (b) the request to which the information relates; (c) the privilege or privileges asserted; and (d) the basis for the claim of privilege.

7. If in answering these Interrogatories You claim any ambiguity in interpreting either the question or any definition or instruction, do not use that claim as a basis for refusing to respond, but set forth as a part of the response the language deemed to be ambiguous and the interpretation chosen or used in responding to the Interrogatory.

8. Respond to Interrogatories or portion thereof by referring to public records, Your business records, or compilations, abstracts, or summaries of Your business records only if the burden of deriving the answer is substantially the same for us as it is for You. If You respond to any Interrogatory or portion thereof by referring to public records, Your business records, or compilations, abstracts, or summaries of Your business records, pursuant to Federal Rule of Civil Procedure 33(d), specify and, if applicable, **produce the documents to which You refer**. Please ensure that the records from which answers may be derived or ascertained are specified in sufficient detail to permit us to locate and identify them as readily as You can. To the extent You have specified any of Your business records in an answer to any Interrogatory or part thereof, and You have not simultaneously produced those documents, in Your response state a reasonable time and place for examination of the documents and provide us a reasonable opportunity to inspect those documents.

9. Pursuant to Federal Rule of Civil Procedure 26(e), supplement Your responses to these interrogatories if You learn that any of Your responses were incomplete or incorrect when made or that any of the responses, though complete and correct when made, are no longer complete and correct.

10. Reference to any legal entity herein shall include its officers, directors, members, employees and agents purporting to act on its behalf, whether authorized to do so or not.

11. When information is requested herein, the request includes documents, information, business ventures and persons both inside and outside of the United States, and is not geographically limited in any way to the United States.

DEFINITIONS

1. “You” or “Your” means Vassilis Kertsikoff 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.

INTERROGATORIES

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.

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 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.

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.

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 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.

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.

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.

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

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.

Dated: January 9, 2026

/s/ Jaelyn Grodin
Jaelyn Grodin
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*Attorneys for Debtor/Judgment Creditor
Eletson Holdings Inc.*

Exhibit A

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 :
 In re: : Chapter 11
 :
 ELETSON HOLDINGS INC.,¹ : Case No. 23-10322 (JPM)
 :
 Debtor. : BC 25,0079
 :
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JUDGMENT AGAINST VASSILIS KERTSIKOFF

Upon (1) the *Order Imposing and Increasing Sanctions Against the Violating Parties* [Docket No. 1874] (the “Eletson Corp. Sanctions Order”), whereby the Court imposed coercive monetary sanctions against Vassilis Kertsikoff, in the amount of \$5,000 per day, commencing November 1, 2025; and (2) the *Memorandum Opinion and Order Granting Eletson Holdings Inc.’s and Levona Holdings Ltd.’s Joint Motion for Sanctions Against the Cypriot Entities, Vassilis Kertsikoff and Laskarina Karastamati* [Docket No. 1885] (the “Cypriot Sanctions Order,” and together with the Eletson Corp. Sanctions Order, the “Sanctions Orders”), whereby the Court imposed sanctions in the amount of \$1,000 per day against Vassilis Kertsikoff, commencing November 19, 2025; the Court having found in the Sanctions Orders that it has personal jurisdiction over Vassilis Kertsikoff; the Court having found that Vassilis Kertsikoff received adequate notice and an opportunity to be heard prior to the issuance of the applicable

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.

Sanctions Orders; and the Court having considered the request of Eletson Holdings Inc. (“Eletson Holdings”) for entry of this judgment (the “Judgment”):

It is hereby **ORDERED, ADJUDGED AND DECREED** that:

1. A judgment is issued in favor of Eletson Holdings against Vassilis Kertsikoff in the amount of \$162,000.00 on account of the sanctioned amounts accrued under the Sanctions Orders through and including November 30, 2025.

2. A schedule explaining the calculation of this Judgment is attached hereto as Exhibit A.

3. Eletson Holdings shall have the immediate right to enforce and execute this Judgment without further notice, stay or action, and this Judgment is final and enforceable.

4. Eletson Holdings’ rights are expressly reserved to seek additional coercive and compensatory monetary sanctions in to-be-determined amounts and to seek further judgments in connection with already-accruing monetary sanctions.

Dated: December 30, 2025
New York, New York

/s/ John P. Mastando III
HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

**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

**DEBTOR/JUDGMENT CREDITOR ELETSON
HOLDINGS INC.'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO JUDGMENT DEBTOR VASSILIS KERTSIKOFF**

TO: **Vassilis Kertsikoff**, by first class mail at 49 El. Venizelou Street, Filothei, Attica 15237, Greece and at 118 Kolokotroni Street, GR 185 35, Piraeus, Greece; and by email at vassilis.kertsikoff@eletson.com and vaskerts@hotmail.com

Pursuant to Federal Rule of Bankruptcy Procedure 7069 and Federal Rules of Civil Procedure 69(a)(2) and 34, Debtor/Judgment Creditor Eletson Holdings Inc. (“Holdings”) requests that Judgment Debtor Vassilis Kertsikoff produce documents as set forth herein no later than 30 days from date of service hereof.

These document requests relate to the Judgment issued by the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) on December 30, 2025, in the above-captioned case requiring the payment to Holdings by the aforesaid Judgment Debtor of \$162,000 (Bankr. Dkt. No. 1933). The Judgment provides that Holdings “shall have the immediate right to enforce and execute this Judgment without further notice, stay or action, and this Judgment is final and enforceable.”

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.

DEFINITIONS

1. “Documents” is synonymous in meaning and equal in scope to its usage in Federal Rule of Civil Procedure 34(a)(1)(A), which states “any designated Documents or electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form” or any designated tangible things, or entry onto land or other property. The term “Document” refers to any Document now or at any time in your possession, custody, or control. A person is deemed in control of a Document if the person has any ownership, possession, or custody of the Document, or the right to secure the Document or a copy thereof from any person or public or private entity having physical possession thereof.

2. “You” or “Your” means Vassilis Kertsikoff and Your agents, representatives, accountants, attorneys, and all other persons or entities acting or purporting to act for or on Your behalf.

3. “Financial Record” means and includes any monthly, quarterly, annual or other periodic statements of account balances or holdings of cash, stocks, bonds or other securities, 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.

4. “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.

5. “Asset” means anything of any type whatsoever in which You hold any type of ownership interest whatsoever.

6. The terms “reflecting,” “relating to” or “referring to” shall mean: pertains to, refers to, contains, reflects, relates to, concerns, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts, and contradicts.

7. The conjunctions “and” and “or” shall be interpreted in each instance as meaning “and/or” so as to encompass the broader of the two possible constructions, and shall not be interpreted disjunctively so as to exclude any information or Documents otherwise within the scope of any request.

INSTRUCTIONS

1. All objections to the production of Documents requested herein shall be made in writing and delivered to the office of Goulston & Storrs PC, Attn: Jaclyn Grodin, 730 Third Avenue, 12th Floor, New York, New York 10017, on or before the date set for production.

2. All information is to be produced as it is kept in the usual course of business including any labels, file markings, or similar identifying features, or shall be organized and labeled to correspond to the categories requested herein. If there is no information in response to a particular request, or if you withhold any responsive Documents or categories of Documents based on any objections, you shall state so in writing.

3. All Documents shall be produced in accordance with the production specifications attached hereto as **Exhibit A**.

4. These requests call for the production of all responsive Documents in your possession, custody or control, or in the possession, custody or control of your employees, predecessors, successors, parents, subsidiaries, divisions, affiliates, partners, joint venturers, brokers, accountants, financial advisors, representatives, and agents or other persons acting on your behalf, without regard to the physical location of such Documents.

5. In responding to these requests, include Documents obtained on your behalf by your counsel, employees, agents, or any other persons acting on your behalf. If your response is that the Documents are not within your possession or custody, describe in detail the unsuccessful efforts you made to locate each such Document. If your response is that Documents are not under your control, identify who has control and the location of the Documents.

6. If any Document was, but no longer is, in your possession, subject to your control, or in existence, include a statement: (a) identifying the Document; (b) describing where the Document is now; (c) identifying who has control of the Document; (d) describing how the Document became lost or destroyed or was transferred; and (e) identifying each of those persons responsible for or having knowledge of the loss, destruction, or transfer of the Document from your possession, custody, or control.

7. Each request contemplates production of all Documents in their entirety. If only a portion of a Document is responsive to one or more requests, the Document shall be produced in its entirety.

8. If any Document is withheld in whole or in part for any reason including but not limited to, a claim of privilege or other protection from disclosure such as the work product doctrine or other business confidentiality or trade secret protection, set out separately with respect to each withheld Document: (a) the ground of privilege or protection claimed; (b) every basis for the

privilege or protection claimed; (c) the type of Document; (d) its general subject matter; (e) the Document's date; and (f) other information sufficient to enable a full assessment of the applicability of the privilege or protection claimed.

9. If you object to any Document request on any ground other than privilege, you must specify: (a) the part of the request that is objectionable and respond and allow inspection of materials responsive to the remainder of the request; and (b) whether any responsive materials are being withheld on the basis of an objection.

10. To the extent you assert that a Document contains information that should be protected from disclosure (based on the attorney-client privilege, work product doctrine, or another protection) and non-privileged information, the non-privileged portions of the Document must be produced. For each such Document, indicate the portion of the Document withheld by stamping the words "MATERIAL REDACTED AS [BASIS FOR PROTECTION]" on the Document in an appropriate location that does not obscure the remaining text.

11. If there are no Documents in response to any particular request, you shall state so in writing.

12. Unless otherwise stated herein, all Documents requested cover the period between January 1, 2023, and the present.

13. Examples of responsive items set out in any request should not be construed to limit the scope of the request.

14. These requests are continuing, and your response to these requests must be promptly supplemented when appropriate or necessary.

DOCUMENTS REQUESTED

Request No. 1: 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.

Request No. 2: 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.

Request No. 3: 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.

Request No. 4: 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 home, office or investment real estate.

Request No. 5: All Documents concerning any trust as to which You are a beneficiary.

Request No. 6: All Documents concerning any trust as to which You are a grantor.

Request No. 7: All Documents concerning any insurance policy of which You are an owner, insured or beneficiary.

Request No. 8: 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.

Request No. 9: 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.

Request No. 10: 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.

Dated: January 9, 2026

/s/ Jaclyn Grodin

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*Attorneys for Debtor/Judgment Creditor
Eletson Holdings Inc.*

Exhibit A

**ELECTRONICALLY STORED INFORMATION
PRODUCTION FORMAT**

All ESI is to be produced in an “imaged” file with the corresponding “image load/unitization files,” “OCR or Extracted text files,” and the “associated delimited metadata database.” Additionally, select files should be produced in their native file format where an image file does not adequately represent the files as maintained in the ordinary course. The key concepts are outlined below.

1. **Native Files:** Microsoft Access files, Excel files, .CSV files, other similar databases and spreadsheet files, and media files shall be produced in the format which the electronically stored information was originally created. Native Files will be produced together with a placeholder TIFF image. Each TIFF placeholder will contain language indicating that the document is being produced in native format. A relative file path to the native file shall be provided in the metadata data file as described in item 5. To the extent the requesting party obtains through discovery a file or document that it believes is not adequately represented in an image file format, it may request that file or document be produced in native format, the production of which may not unreasonably be withheld.

2. **Image Files:**

a. Images files shall be 300 DPI Group IV single-page TIFF files (color images must be produced in JPEG format);

b. Hidden content, tracked changes or edits, comments, notes, and other similar information viewable within the native file shall also be imaged so that such content is viewable on the image;

c. Images must be endorsed with sequential Bates numbers in the lower right corner of each page and the file name of each image file shall be the Bates number.

d. AUTOCAD/photograph files should be produced as a single page JPEG file.

3. **Image Cross-Reference File:**

The image cross-reference file (.LOG or .OPT) links the images to the database records. It should be a comma-delimited file consisting of seven fields per line with a line in the cross-reference file for every image in the database with the following format:

ImageID,VolumeLabel,ImageFilePath,DocumentBreak,FolderBreak,BoxBreak,PageCount

Sample Image Cross-Reference File:

IMG0000001,,E:\001\IMG0000001.TIF,Y,,,

IMG0000002,,E:\001\IMG0000002.TIF,,,,

IMG0000003,,E:\001\IMG0000003.TIF,,,,

IMG0000004,,E:\001\IMG0000004.TIF,Y,,,

IMG0000005,,E:\001\IMG0000005.TIF,Y,,,

IMG0000006,,E:\001\IMG0000006.TIF,,,,

4. **Text File:** An OCR or Extracted text file which corresponds to each produced document shall be provided for each document in the production as follows:

a. Text must be produced as separate text files, not as fields within the .DAT file.

The full path to the text file (OCRPATH) should be included in the .DAT file.

b. The text file name shall be the same name of the first image page for the document, followed by .txt.

c. An OCR or Extracted text file containing the produced document's content will be provided for all documents whether it is produced as an image file or native).

5. **Data File:** A data file shall be provided in a .DAT file format that extracts metadata into fields in a delimited text load file. The parties should use Concordance standard delimiters (ASCII 020 corresponding to a comma, ASCII 254 corresponding to a quote, ASCII 174

corresponding to a new line, and a semicolon used to separate values). The fielded data should include all the below metadata fields for a file/document. The first line of the data load file should contain the field headers indicating the contents of each field, and each subsequent line should contain the fielded data for each document.

FIELD NAME	FIELD DESCRIPTION	APPLICABLE FILE TYPE(S)
BEGBATES	Beginning production number for a given file/document	Email, E-Doc and Other 2
ENDBATES	Ending production number for a given file/document	Email, E-Doc and Other
BEGATTACH	Production number of first page of parent	Email, E-Doc and Other
ENDATTACH	Production number of last page of last attachment	Email, E-Doc and Other
CUSTODIANS	All custodians whose files contained a particular document that was produced or eliminated through de-duplication	Email, E-Doc and Other
CONFIDENTIALITY	Identifies the confidentiality designation of the document.	Email, E-Doc and Other
REDACTED	Identifies if the document contains redactions	Email, E-Doc and Other
FILEEXT	File extension	Email and E-Doc
HASH	MD5 Hash Value	E-mail and E-Doc
SUBJECT	Subject	E-mail
FROM	Sender	E-mail
TO	Recipient	E-mail
CC	Copyee	E-mail
BCC	Blind Copyee	E-mail
DATESENT	Date Sent & Time (MM/DD/YYYY HH:MM)	E-mail

² Other is defined as documents for which internal metadata is not exchanged, including but not limited to, scanned documents and documents obtained from the interne.

DATERECEIVED	Date Received & Time (MM/DD/YYYY HH:MM)	E-mail
AUTHOR	Author	E-Doc
LASTSAVEDBY	Name of user to last save the file	E-Doc
PAGECOUNT	Number of pages in a document	E-Doc
FILESIZE	Size of native file document/email in bytes	E-Doc
DATELASTMOD	Date modified & Time (MM/DD/YYYY HH:MM)	E-Doc
DATECREATED	Date created & Time (MM/DD/YYYY HH:MM)	E-Doc
DATEACCESSED	Date accessed & Time (MM/DD/YYYY HH:MM)	E-Doc
ITEMTYPE	Identifies whether the file is an email, attachment to email, or loose edoc	E-mail and E-Doc
FILENAME	Original file name	E-Doc
FILEPATH	Original file path to the file or e- mailbox folder structure	E-mail and E-Doc
ATTACHMENTNAMES	Names of attachments embed in email	E-mail
MESSAGEID	Message number created by email application	E-mail
CONVERSATIONINDEX	E-mail thread identifier created by email system	E-mail
NATIVEFILE	Path to native file as produced	Native
TEXTPATH	Path to OCR or extracted text file	E-mail, E-Doc and Other