

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
Epic! Creations, Inc., <i>et al.</i> , ¹)	Case No. 24-11161 (JTD)
)	
Alleged Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 2, 5, 6, 34, 37, 59 & 66

**CERTIFICATE OF NO OBJECTION REGARDING PETITIONING
CREDITORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING
THE FILING OF CERTAIN CONFIDENTIAL INFORMATION
AND RELATED DOCUMENTS UNDER SEAL**

The undersigned counsel to the petitioning creditors (the "Petitioning Creditors")² of the above-captioned alleged debtors and debtors in possession, hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been received to the (i) *Petitioning Creditors' Motion for Entry of an Order Authorizing the Filing of Certain Confidential Information and Related Documents Under Seal* [Docket No. 6] (the "Motion") filed on June 5, 2024 or (ii) *Notice of Filing of Revised Proposed Order Authorizing Petitioning Creditors to File Certain Confidential Information and Related Documents Under Seal* [Docket No. 59] filed on June 26, 2024, which attached thereto a revised proposed form of order as Exhibit A (the "Revised Proposed Order").³ The undersigned further certifies that the Court's docket has been reviewed in

¹ The Alleged Debtors in these chapter 11 cases, along with the last four digits of each Alleged Debtor's federal tax identification number, are: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).

² The "Petitioning Creditors" are comprised of (i) GLAS Trust Company LLC, in its capacity as administrative and collateral agent ("GLAS") under the Credit Agreement (as defined in the *Petitioning Creditors' Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 4]) and (ii) certain lenders under the Credit Agreement (each a "Petitioning Lender Creditor" and collectively, the "Petitioning Lender Creditors").

³ Prior to the filing of the Revised Proposed Order, the Petitioning Creditors circulated the Revised Proposed Order to counsel to the Alleged Debtors and the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"). The Alleged Debtors and U.S. Trustee confirmed they have no objection to entry of the Revised Proposed Order.



these cases and no answer, objection, or other responsive pleading to the Motion or the Revised Proposed Order appears thereon. Pursuant to the *Amended Notice of Petitioning Creditors' Motion for Entry of an Order Authorizing the Filing of Certain Confidential Information and Related Documents Under Seal* [Docket No. 66], objections to the Motion were to be filed and served on the undersigned counsel no later than 4:00 p.m. (prevailing Eastern Time) on June 28, 2024. It is hereby respectfully requested that the Revised Proposed Order be entered at the earliest convenience of the Court.⁴

[Remainder of this page intentionally left blank.]

⁴ On June 27, 2024, the Court entered the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 61] (the “Joint Administration Order”). As such, the caption in the Revised Proposed Order uploaded for the Court’s consideration has been updated to comply with the Joint Administration Order.

Dated: July 1, 2024

/s/ Peter J. Keane

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