

**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. 1, 2 & 55

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER
APPROVING STIPULATION FURTHER EXTENDING DEADLINE FOR
ALLEGED DEBTORS TO RESPOND TO INVOLUNTARY PETITIONS**

The undersigned counsel to the Petitioning Creditors² of the above-captioned alleged debtors and debtors in possession (collectively, the “Alleged Debtors”), hereby certify as follows:

1. On June 5, 2024, the Petitioning Creditors filed involuntary chapter 11 bankruptcy petitions [Docket No. 1] for relief against each Alleged Debtor in this Court under chapter 11 of the Bankruptcy Code. The involuntary petitions were redacted to protect certain commercially sensitive information of the Petitioning Lender Creditors, and unredacted versions of the involuntary petitions were filed under seal at Docket No. 2 (together, the “Involuntary Petitions”). The original deadline to respond to the Involuntary Petitions (the “Response Deadline”) was June 26, 2024.

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”).



2. On June 26, 2024, the Court entered the *Order Approving Stipulation and Joint Proposed Briefing Schedule* [Docket No. 55], which extended the Response Deadline through and including July 5, 2024.

3. The Petitioning Creditors and the Alleged Debtors have agreed to further extend the Response Deadline through and including July 8, 2024.

4. The Petitioning Creditors and the Alleged Debtors have entered into a Second Stipulation Modifying Briefing Schedule for Involuntary Petitions (the “Second Scheduling Stipulation”).

5. The Petitioning Creditors and the Alleged Debtors respectfully request that the Court enter the Proposed Order attached hereto as Exhibit A approving the Second Scheduling Stipulation attached to the Proposed Order as Exhibit 1, at its earliest convenience.

Dated: July 8, 2024

/s/ Peter J. Keane

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Counsel to the Petitioning Lender Creditors

EXHIBIT A

Proposed Order

**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. 1, 2 & 55

**ORDER APPROVING SECOND STIPULATION FURTHER EXTENDING DEADLINE
FOR ALLEGED DEBTORS TO RESPOND TO INVOLUNTARY PETITIONS**

This Court having considered the Second Scheduling Stipulation² by and between the Petitioning Creditors and the Alleged Debtors (together, the “Parties”), a copy of which is attached hereto as Exhibit 1; this Court having determined that good and adequate cause exists for approval of the Second Scheduling Stipulation; and this Court having determined that no further notice of the Second Scheduling Stipulation must be given; it is hereby ORDERED:

1. The Second Scheduling Stipulation is APPROVED.
2. The current deadline of July 5, 2024 for the Alleged Debtors to respond to the Involuntary Petitions is extended through and including July 8, 2024.
3. If the Alleged Debtors contest one or more of the Involuntary Petitions, the Parties shall meet and confer within three (3) days to discuss an appropriate schedule for discovery, briefing and a hearing on the Involuntary Petition(s). If the parties reach an impasse on the schedule for discovery, briefing or hearing, any Party may request that the Court schedule a status conference.

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 Capitalized terms used but not otherwise defined in this Order shall have the meanings ascribed to them in the Modified Scheduling Stipulation.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT 1

Second Scheduling Stipulation

**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. 1, 2 & 55

**SECOND STIPULATION MODIFYING BRIEFING SCHEDULE FOR
INVOLUNTARY PETITIONS**

The petitioning creditors (the “Petitioning Creditors”)² of the above-captioned alleged debtors and debtors in possession (collectively, the “Alleged Debtors” and, with the Petitioning Creditors, the “Parties”) and the Alleged Debtors hereby agree and stipulate as follows:

WHEREAS, on June 5, 2024, the Petitioning Creditors filed involuntary chapter 11 bankruptcy petitions [Docket No. 1] for relief against each Alleged Debtor in this Court under chapter 11 of the Bankruptcy Code. The involuntary petitions were redacted to protect certain commercially sensitive information of the Petitioning Lender Creditors, and unredacted versions of the involuntary petitions were filed under seal at Docket No. 2 (together, the “Involuntary Petitions”). The original deadline to respond to the Involuntary Petitions was June 26, 2024 (the “Response Deadline”).

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”).

WHEREAS, on June 26, 2024, the Court entered the *Order Approving Stipulation and Joint Proposed Briefing Schedule* [Docket No. 55], which extended the deadline for the Alleged Debtors to respond to the Involuntary Petitions through and including July 5, 2024.

WHEREAS, the Petitioning Creditors and the Alleged Debtors conferred and have agreed to further extend the Response Deadline as set forth in this Stipulation.

WHEREFORE, IT IS STIPULATED AND AGREED by and among the Petitioning Creditors and the Alleged Debtors, subject to approval of the Court, that:

1. The current deadline of July 5, 2024 for the Alleged Debtors to respond to the Involuntary Petitions is extended through and including July 8, 2024.

2. If the Alleged Debtors file contest one or more of the Involuntary Petitions, the Parties shall meet and confer within three (3) days to discuss an appropriate schedule for discovery, briefing and a hearing on the Involuntary Petition(s). If the parties reach an impasse on the schedule for discovery, briefing or hearing, any Party may request that the Court schedule a status conference.

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Dated: July 8, 2024

/s/ Peter J. Keane

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