

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:  EPIC! CREATIONS, INC., <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 24-11161 (BLS)  (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,  Plaintiff  vs.  Stripe, Inc. Wells Fargo Bank, National Association Whitehat Education Technology LLC John Does 1-100  Defendants	Adv. Pro. No. _____ (BLS)  (Jointly Administered)

**COMPLAINT FOR TEMPORARY RESTRAINING ORDER,  
PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF,  
AND AVOIDANCE AND RECOVERY UNDER 11 U.S.C. §§ 549 AND 550**

Claudia Z. Springer, not individually but as the Chapter 11 Trustee (the “**Trustee**”) of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. (the “**Debtors**” and, each, a “**Debtor**”), through counsel, for her complaint against Stripe, Inc., Wells Fargo Bank, National Association, Whitehat Education Technology LLC, and John Does 1-100, and alleges as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b) and the *Amended Standing Order of Reference from the United States District Court for the District of*

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



24111612410080000000000001

*Delaware*, dated as of February 29, 2012, because this matter arises in, arises under and is related to the above-captioned bankruptcy cases.

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A),(E), and (O). The Trustee consents, pursuant to Local Rule 9013-1(f), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The Trustee commences this adversary proceeding in accordance with Rules 7001 and 7065 of the Federal Rules of Bankruptcy Procedure and Rule 65 of the Federal Rules of Civil Procedure.

### **THE PARTIES**

5. The Trustee is the duly appointed Chapter 11 Trustee in the above captioned cases.  
[D.I. 180]

6. Upon information and belief, Stripe, Inc. is an Irish-American multinational financial services and software as a service (SaaS) company dual-headquartered in South San Francisco, California, United States and Dublin, Ireland.

7. Upon information and belief, Defendant Wells Fargo, National Association (“**Wells Fargo**”) is a Delaware Corporation with its headquarters in San Francisco, California.

8. Upon information and belief, Whitehat Education Technology LLC (“**Whitehat**”) is a Delaware limited liability company.

9. Upon information and belief, John Does 1-100 are individuals residing in India.

**GENERAL ALLEGATIONS**

10. On June 4, 2024 (the “**Petition Date**”), GLAS Trust Company LLC, in its capacity as administrative and collateral agent under the November 24, 2021, Credit and Guaranty Agreement and certain other lenders (the “**Petitioning Lender Creditors**”) under the Credit Agreement filed an involuntary chapter 11 petition against each Debtor. [D.I. 1]

11. On June 27, 2024, this Court entered an order directing joint administration of the Debtors’ cases for procedural purposes. [D.I. 61]

12. On September 16, 2024 (the “**Order for Relief Date**”), this Court entered an order for relief in the Debtors’ involuntary chapter 11 cases and directed the appointment of a chapter 11 trustee as a default sanction based on the Debtors’ failure to comply with their discovery obligations to the Petitioning Lender Creditors. [D.I. 147]

13. On September 23, 2024, the United States Trustee for Region 3 (the “**U.S. Trustee**”) duly appointed the Claudia Z. Springer as chapter 11 trustee of each Debtor, subject to approval by the Court. [D.I. 152]

14. On October 7, 2024, this Court entered an order approving the appointment of the Trustee. [D.I. 180]

15. The Debtors use the services of Stripe to process certain payments by vendors and other users of the Debtors’ products and services.

16. On September 30, 2024, the Trustee sent a letter via electronic mail to the Chief Legal Officer of Stripe. The letter stated, in part:

I am informed that the Debtors use the services of Stripe to process certain payments by vendors and other users of the Debtors’ products and services. I write to provide notice to Stripe that, pursuant to Section 542 of the Bankruptcy Code, any funds collected by Stripe relating to the Debtors’ businesses are property of the Debtors’ estates and are subject to my direction and turnover to the estates. Stripe

should take no instructions from anyone other than me, as Chapter 11 Trustee of the Debtors, with respect to the Debtors' funds. Further, I would like to speak to someone at Stripe regarding changing the administrator of the Stripe accounts associated with one or more of the Debtors to me or a person I designate.

Please be advised that the Bankruptcy Code's automatic stay, among other things, prevents Stripe from taking any act to take possession of the Debtors' property or to setoff or collect a claim from the Debtors.

A copy of the Trustee's letter is attached hereto as Exhibit A. Neither the Trustee nor her counsel received any response to the September 30, 2024 letter.

17. Notwithstanding the Trustee's letter, on October 1, 2024, Stripe permitted a transfer of \$9,999.00 from the Debtors' Stripe account to a Wells Fargo Bank account ending in 0879. On October 7, 2024, Stripe permitted a second transfer of \$484,992.50 from the Debtors' Stripe account to the same Wells Fargo Bank account. A screen shot showing these unauthorized transfers is below.

**Balances** + New payout Manage

Overview All activity Top-ups Payouts

Date
Amount
Status
Method
Export

Amount		Bank/card	Arrive by
\$484,992.50	USD <span>Paid</span>	Wells Fargo Bank **** 0879	Oct 7
\$9,999.00	USD <span>Paid</span>	Wells Fargo Bank **** 0879 <span>Instant</span>	Oct 2


18. In addition to the above transfers, the Trustee has identified a transfer made on September 26, 2024, after the Order for Relief Date, but prior to the Trustee's September 30, 2024 letter, in the amount of \$201,565.07 to the same Wells Fargo account. A screen shot showing this unauthorized transfer is below.

\$201,565.07	USD <span>Paid</span>	Wells Fargo Bank **** 0879	Sep 25
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19. The September 26, 2024, October 1, 2024, and October 7, 2024 unauthorized transfers are referred to collectively herein as the **"Unauthorized Postpetition Transfers."**

20. Upon information and belief, the account holder for the Wells Fargo account into which the Unauthorized Postpetition Transfers were made is Whitehat. A screen shot showing Whitehat as the account holder of this account is below.

## Account details

<div> <div> <div>▼</div> <div>WF Wells Fargo Bank ••• 0879</div> </div> <div> <div>🇺🇸 USD</div> </div> </div>	
Type	Bank account
Created	<a href="#">Oct 2, 2024, 9:36 PM</a>
Account holder	Whitehat Education Technology LLC
Origin	 United States
Fingerprint	9xy5j19ho9byLBhW ⓘ
Routing number	121000248
ID	ba_1Q5gmB4ihoU8R0twMWZXUhiX

21. The Debtors' Stripe account history shows unauthorized attempts by various third parties (Defendants John Does 1-100)—none of which are working at the direction of the Trustee—to access the Debtors' account and to create payouts. The email addresses associated with these requests are [nikhil.prakash@getpic.com](mailto:nikhil.prakash@getpic.com), [vineay@byjus.com](mailto:vineay@byjus.com), and [lakshmivenkat.koppula@getpic.com](mailto:lakshmivenkat.koppula@getpic.com). None of these e-mail addresses are known to the Trustee as e-mail address of current employees of the Debtors working at her direction. A screen shot of this activity is below:

Q Search		Developers	Test mode	?	🔍	⚙️	Create +
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:26 AM		
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:26 AM		
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:05 AM		
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:05 AM		
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:05 AM		
> nikhil.prakash@getepic.com entered an invalid password	User security	#7E1CA35C	🇮🇳	106.222.202.138	Oct 7, 9:05 AM		
> vinay@byjus.com created a payout	Financial	#0875F7E9	🇮🇳	152.58.232.164	Oct 3, 9:26 PM		
> Payout plan changed	Financial	#0875F7E9	🇮🇳	152.58.232.164	Oct 3, 9:24 PM		
> vinay@byjus.com logged in from a new device	User security	#C7D07E2F	🇮🇳	152.58.232.164	Oct 3, 5:51 PM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:38 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:36 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:35 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:13 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:11 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:07 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:02 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 4:00 AM		
> lakshmivenkat.koppula@getepic.com updated a customer subscription	Billing	#CC58377D	🇮🇳	106.222.229.216	Oct 3, 3:55 AM		
> vinay@byjus.com successfully provided the previous account number for a pa...	User security	#0875F7E9	🇮🇳	152.58.232.164	Oct 2, 9:46 PM		
> vinay@byjus.com created a payout	Financial	#0875F7E9	🇮🇳	152.58.232.164	Oct 2, 9:39 PM		
Over 10,000 results						Previous	Next

22. Upon information and belief, Whitehat's operations and finances (including its Wells Fargo account) and the individuals in India seeking to access the funds held by Stripe are still controlled by Byju Raveendran and his family members.

23. Upon information and belief, additional Unauthorized Postpetition Transfers may have been made to Whitehat through its Wells Fargo account.

24. On October 8, 2024, counsel for the Trustee sent an electronic mail to the Chief Legal Officer of Stripe, instructing of the Unauthorized Prepetition Transactions and the Trustee's intent to seek injunctive relief, a copy of which is attached hereto as **Exhibit B**. As of the filing of this Complaint, no response has been received.

**FIRST CLAIM FOR RELIEF**

**(Temporary, Preliminary, and Permanent Injunction against Stripe,  
Wells Fargo, Whitehat, and John Does 1-100)**

25. The Trustee repeats and realleges paragraphs 1-22, inclusive, as if fully set forth herein.

26. The Trustee is entitled to a temporary restraining order, preliminary injunction and a permanent injunction enjoining Stripe and all persons acting in concert with Stripe: (i) from accepting, authorizing, or implementing any changes to the Debtor's Stripe's accounts by any entity or person other than the Chapter 11 Trustee; and (ii) from transferring any funds Stripe is holding related to the Debtors including in the Stripe accounts to any entity or person other than the Chapter 11 Trustee. In addition, the Trustee requests that such injunction order Stripe to provide the Chapter 11 Trustee with complete account access and records of the Debtors' Stripe accounts.

27. The Trustee is entitled to a temporary restraining order, preliminary injunction and a permanent injunction enjoining Whitehat and all persons acting in concert with Whitehat, including but not limited to John Does 1-100: (i) from seeking to access funds in any of the Debtors' accounts wherever held including accounts held by Stripe; and (ii) from transferring any of the Unauthorized Postpetition Transfers in its Wells Fargo account to any other account.

28. The Trustee is entitled to a temporary restraining order, preliminary injunction and a permanent injunction enjoining Wells Fargo and all persons acting in concert with Well Fargo from transferring any funds out of Whitehat's Wells Fargo account and freezing all activity in that account.

29. The Chapter 11 Trustee and the Debtors' estates will be irreparably harmed if the requested relief is not granted. By permitting the Unauthorized Postpetition Transfers, Stripe allowed property of the Debtors to be transferred to a third party. The Trustee fears that if the funds that have been transferred to Wells Fargo are allowed to be transferred they will be removed to overseas accounts and out of the reach of this Court. Further, if the requested relief is not granted, the Chapter 11 Trustee believes the bad actor or bad actors who initiated the transfers from the Debtors' Stripe accounts to Whitehat will continue to divert money from the Debtors' estates and the Debtors' creditors.

30. The injury to the Debtors' estates of continued transfers of the Debtors' property outweighs whatever damage the proposed injunction may cause Stripe.

31. In light of the foregoing and the present facts, and the potential for more damage to the Debtors' estates and harm to the Debtors' creditors, the balancing of the equities strongly favors entry of the requested preliminary injunction.

## **SECOND CLAIM FOR RELIEF**

### **(Action for Turnover against Stripe, Whitehat, and Wells Fargo Under 11 U.S.C. §542(a))**

32. The Trustee repeats and realleges paragraphs 1-22, inclusive, as if fully set forth herein.

33. Section 542(a) provides that "an entity, other than a custodian in possession, custody or control, during the case, of property that the trustee may use, sell, or lease under section 363 of this title, ... shall deliver such property or the value of such property, unless such property is of inconsequential value or benefit to the estate."



34. Stripe was in possession of property that the Chapter 11 Trustee may use as of the Petition Date and the Order for Relief Date, and should be ordered to turnover all cash that it has not transferred to Debtors' accounts or the Trustee, including the cash identified as the Unauthorized Postpetition Transfers.

35. Upon information and belief, Wells Fargo is in possession of the Unauthorized Postpetition Transfers and should be ordered to turnover those funds to the Chapter 11 Trustee.

36. Upon information and belief, Whitehat is in possession of the Unauthorized Postpetition Transfers and should be ordered to turnover those funds to the Chapter 11 Trustee.

### **THIRD CLAIM FOR RELIEF**

#### **(Stay Violation Against Whitehat, Stripe, and John Does 1-100)**

37. The Trustee repeats and realleges paragraphs 1-22, inclusive, as if fully set forth herein.

38. The Unauthorized Postpetition Transfers constitute an "act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate" and therefore violate 11 U.S.C. § 362(a)(3).

39. Defendant Stripe permitted the Unauthorized Postpetition Transfers to occur after the Order for Relief Date, and, with respect to the October 1 and 7, 2024 Unauthorized Postpetition Transfers, after the Trustee's September 30, 2024 letter.

40. John Does 1-100 either initiated the Unauthorized Postpetition Transfers or attempted to initiate the Unauthorized Postpetition Transfers after the Order for Relief Date.

41. Whitehat received the Unauthorized Postpetition Transfers, and upon information and belief, directed John Does 1-100 and Wells Fargo to initiate the Unauthorized Postpetition Transfers, after the Order for Relief Date.

42. The violation of the bankruptcy stay was willful because, upon information and belief, Stripe, Whitehat, and John Does 1-100 initiated the Unauthorized Postpetition Transfers after the Order for Relief Date and (as to Stripe, with respect to the October 1 and 7, 2024 Unauthorized Postpetition Transfers) after the Trustee's September 30, 2024 letter.

43. Stripe, Whitehat, and John Does 1-100 should be liable for actual and punitive damages for willfully violating the automatic stay.

#### **FOURTH CLAIM FOR RELIEF**

##### **(Avoidance and Recovery of Unauthorized Postpetition Transfer Against Wells Fargo and Whitehat Under 11 U.S.C. §§ 549 and 550)**

44. The Trustee repeats and realleges paragraphs 1-22, inclusive, as if fully set forth herein.

45. The Unauthorized Postpetition Transfers occurred after the Order for Relief Date.

46. The Unauthorized Postpetition Transfers were transfers of property of the Debtors' estates.

47. The Unauthorized Postpetition Transfers were not authorized by the Bankruptcy Court or the Bankruptcy Code or the Chapter 11 Trustee.

48. Defendant Wells Fargo is an initial transferee of the Unauthorized Postpetition Transfers.

49. Defendant Whitehat is an initial transferee of the Unauthorized Postpetition Transfers or an immediate or mediate transferee of Wells Fargo.

50. On information and belief, Whitehat and Wells Fargo may have received additional Unauthorized Postpetition Transfers.

51. In light of the foregoing, the Unauthorized Postpetition Transfers should be avoided pursuant to Section 549 of the Bankruptcy Code and the Chapter 11 Trustee should recover from Wells Fargo and/or Whitehat pursuant to Section 550, the full amount of the Unauthorized Postpetition Transfers, plus interest from the relevant dates and cost and fees to the extent available, for the benefit of the Debtors' bankruptcy estates.

WHEREFORE, the Chapter 11 Trustee prays for judgment as follows:

- (a) A temporary restraining order, preliminary injunction, and a permanent injunction enjoining Stripe and all persons acting in concert with Stripe: (i) from accepting, authorizing, or implementing any changes to the Debtor's Stripe's accounts by any entity or person other than the Chapter 11 Trustee; and (ii) from transferring any funds Stripe is holding related to the Debtors including in the Stripe accounts to any entity or person other than the Chapter 11 Trustee. In addition, the Trustee requests that such temporary restraining order and such injunction order Stripe to provide the Chapter 11 Trustee with complete account access and records of the Debtors' Stripe accounts;
- (b) A temporary restraining order, preliminary injunction, and a permanent injunction enjoining Whitehat and all persons acting in concert with Whitehat, including but not limited to John Does 1-100 (i) from seeking to access funds in any of the Debtors' accounts, wherever held, including accounts held by Stripe; and (ii) from transferring any of the Unauthorized Postpetition Transfers in Whitehat's Wells Fargo account or any other funds that Whitehat is holding, to any other account or person or entity.

- (c) A temporary restraining order, preliminary injunction, and a permanent injunction enjoining Wells Fargo and all persons acting in concert with Wells Fargo from transferring any funds out of Whitehat's Wells Fargo account and freezing all activity in that account;
- (d) A judgment that Stripe violated the automatic stay with respect to the Unauthorized Postpetition Transfers and a judgment that Stripe is ordered to turnover the amount of the Unauthorized Postpetition Transfers to the Chapter 11 Trustee;
- (e) A judgment that Whitehat is ordered to turnover the amount of the Unauthorized Postpetition Transfers to the Chapter 11 Trustee;
- (f) A judgment that Whitehat violated the automatic stay with respect to the Unauthorized Postpetition Transfers and is ordered to turnover the amount of the Unauthorized Postpetition Transfers to the Chapter 11 Trustee;
- (g) A judgment against Stripe, Whitehat, and Wells Fargo avoiding the Unauthorized Postpetition Transfers pursuant to Section 549 of the Bankruptcy Code in the full amount of the Unauthorized Postpetition Transfers and ordering the recovery of such Unauthorized Postpetition Transfers from any initial, mediate or intermediate transferee of such transfers or any person or entity for whose benefit such transfers were made, plus interest from the relevant dates and cost and fees to the extent available, for the benefit of the Debtors' bankruptcy estates;
- (h) Pre- and post-judgment interest up to the statutory maximum, together with fees, actual damages and punitive damages to the extent permitted by law; and
- (i) For cost of suit and such other and further relief as the Court may deem just and proper.

Wilmington, Delaware  
October 8, 2024

/s/ Henry J. Jaffe

**PASHMAN STEIN WALDER HAYDEN, P.C.**

Henry J. Jaffe (DE Bar No. 2987)

Joseph C. Barsalona II (DE Bar No. 6102)

Pashman Stein Walder Hayden, P.C.

824 North Market Street, Suite 800

Wilmington, DE 07601

Telephone: (302) 592-6497

[jbarsalona@pashmanstein.com](mailto:jbarsalona@pashmanstein.com)

-and-

**JENNER & BLOCK LLP**

Catherine Steege (admitted *pro hac vice*)

Melissa Root (admitted *pro hac vice*)

William A. Williams (admitted *pro hac vice*)

353 N. Clark Street

Chicago, Illinois 60654

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[csteege@jenner.com](mailto:csteege@jenner.com)

[mroot@jenner.com](mailto:mroot@jenner.com)

[wwilliams@jenner.com](mailto:wwilliams@jenner.com)

*Proposed Counsel to the Chapter 11 Trustee*

**Exhibit A**



401 North Franklin Street  
Suite 4E  
Chicago, IL 60654

September 30, 2024

Via Electronic Mail

Stripe, Inc.  
Chief Legal Officer  
trish@stripe.com

Dear Trish Walsh:

I am the appointed Chapter 11 Trustee in the bankruptcy cases of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. (the “**Debtors**”), Case No. 24-11161 (jointly administered), pending before the United States Bankruptcy Court for the District of Delaware. I enclose with this letter a copy of the *Notice Of Appointment of Chapter 11 Trustee* appointing me as Chapter 11 Trustee in each of these cases as of September 23, 2024.

I am informed that the Debtors use the services of Stripe to process certain payments by vendors and other users of the Debtors’ products and services. I write to provide notice to Stripe that, pursuant to Section 542 of the Bankruptcy Code, any funds collected by Stripe relating to the Debtors’ businesses are property of the Debtors’ estates and are subject to my direction and turnover to the estates. Stripe should take no instructions from anyone other than me, as Chapter 11 Trustee of the Debtors, with respect to the Debtors’ funds. Further, I would like to speak to someone at Stripe regarding changing the administrator of the Stripe accounts associated with one or more of the Debtors to me or a person I designate.

Please be advised that the Bankruptcy Code’s automatic stay, among other things, prevents Stripe from taking any act to take possession of the Debtors’ property or to setoff or collect a claim from the Debtors.

Please either contact me or have the person who is responsible for each of the Debtors’ accounts contact me to make certain that payments are being sent to the correct bank account and we can discuss a change regarding the administrator of the account(s) at Stripe. Thank you.

Thank you very much.

Very truly yours,

Claudia Z. Springer, Chapter 11 Trustee  
[cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

A handwritten signature in blue ink, consisting of a stylized 'C' followed by a horizontal line.

Confidential

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

-----  
In re: : Chapter 11  
: :  
EPIC! CREATIONS, INC., *et. al.*,<sup>1</sup> : Case No. 24-11161 (JTD)  
: :  
Debtors. : (Jointly Administered)  
-----  
:

**NOTICE OF APPOINTMENT OF CHAPTER 11 TRUSTEE**

To:  
Claudia Z. Springer  
Novo Advisors  
401 N. Franklin St.  
Suite 4 East  
Chicago, IL 60654  
Email: [cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

Pursuant to the Order of this Court entered on September 16, 2024 (Docket No. 147) directing the United States Trustee to appoint a chapter 11 trustee in the above-captioned cases of Epic! Creations, Inc., et al., the United States Trustee hereby appoints Claudia Z. Springer to serve as the chapter 11 trustee in the case.

The chapter 11 trustee bond is initially set at 150% of the current aggregate of cash balances held in bank accounts of Epic! Creations, Inc., et al. The bond may require adjustment as the trustee collects and liquidates assets of the estate, and the trustee is directed to inform the Office of the United States Trustee when changes to the bond amount are required or made. Pursuant to 11 U.S.C. § 322, the bond must be filed with the United States Trustee within five (5) days of the date of your appointment. You are required to notify the Court and

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



the United States Trustee, in writing, within seven (7) days after receipt of this notice of your acceptance of this appointment.

Dated: September 23, 2024  
Wilmington, Delaware

**ANDREW R. VARA**  
**UNITED STATES TRUSTEE**  
**REGIONS 3 AND 9**

By: /s/ Linda J. Casey

Linda J. Casey

Trial Attorney

United States Department of Justice

Office of the United States Trustee

J. Caleb Boggs Federal Building

844 King Street, Suite 2207, Lockbox 35

Wilmington, DE 19801

(302) 573-6491

[Linda.Casey@usdoj.gov](mailto:Linda.Casey@usdoj.gov)

**Exhibit B**

**Alexis R. Gambale**

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**From:** Alexis R. Gambale  
**Sent:** Tuesday, October 8, 2024 2:52 PM  
**To:** Alexis R. Gambale  
**Subject:** FW: In re Epic! Creations, Inc., 24-11161 , Demand for Immediate Action

**Importance:** High

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**From:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>  
**Sent:** Tuesday, October 8, 2024 9:16 AM  
**To:** [trish@stripe.com](mailto:trish@stripe.com)  
**Cc:** Claudia Z. Springer ([cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)) <[cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>; Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Sandeep Gupta <[sgupta@novo-advisors.com](mailto:sgupta@novo-advisors.com)>  
**Subject:** In re Epic! Creations, Inc., 24-11161 , Demand for Immediate Action  
**Importance:** High

Dear Ms. Walsh,

I represent Claudia Springer, trustee for Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. On October 1, 2024, Stripe was notified of the appointment of Ms. Springer and of the pending bankruptcy cases. A copy of that notification is attached. Ms. Springer further advised that “pursuant to Section 542 of the Bankruptcy Code, any funds collected by Stripe relating to the Debtors’ businesses are property related to the Debtors’ estates and are subject to my direction and turnover to the estates.”

Notwithstanding that notification, it has come to Ms. Springer’s attention that since October 1, Stripe has allowed \$494,991.50 to be transferred out of the Stripe account to a Wells Fargo account ending with the numbers 0879, on October 2 and October 7, respectively. Please be advised that Ms. Springer intends to seek temporary, preliminary, and permanent injunctive relief against Stripe to prevent any further funds from being transferred to any account other than her trustee account. Please place an immediate hold on any accounts associated with any of these debtors. In addition, Stripe is liable pursuant to Section 549 of the Code for the return of the funds transferred from the account since the order for relief on September 16, 2024 to any account other than one controlled by the Trustee.

Please confirm that you will take appropriate action to freeze the account and to the extent that you can claw back the \$484,992.50 that was transferred yesterday, you should do so and advise us accordingly.

Catherine Steege

---

**Catherine L. Steege**

**Jenner & Block LLP**  
353 N. Clark Street  
Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)  
+1 312 923 2952 | Tel  
+1 312 206 7091 | Mobile  
[CSteege@jenner.com](mailto:CSteege@jenner.com)

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