

**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)

**DECLARATION OF CLAUDIA Z. SPRINGER IN SUPPORT  
OF MOTION FOR ENTRY OF TEMPORARY RESTRAINING ORDER**

I, Claudia Z. Springer, hereby declare under penalty of perjury:

1. I am the duly appointed Chapter 11 Trustee (the “**Trustee**”) of Epic! Creations, Inc. (“**Epic**”), Neuron Fuel, Inc. (“**Neuron Fuel**”), and Tangible Play, Inc. (“**Tangible Play**,” together with Epic and Neuron Fuel, collectively the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”).

<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).



2. I am a Principal in the Philadelphia office of Novo Advisors, a restructuring-focused consulting firm. Prior to joining Novo Advisors in 2021, I practiced bankruptcy law for more than 40 years, most recently as a partner at Reed Smith LLP and Duane Morris LLP.

3. I am duly authorized to make this Affidavit in my capacity as Trustee in support of the *Trustee's Motion For Entry of Temporary Restraining Order and Preliminary Injunction* (the "**Motion**") to which this Affidavit will be attached.

4. I have read the Complaint and the Motion, and to the best of my knowledge, information and belief, the contents of the Complaint, the Motion and this Affidavit are true and correct.

5. The statements in this Affidavit are based on my personal knowledge; information supplied or verified by my professionals; my review of the Debtors' business records, bank records, and other relevant documents; or my opinion based upon my experience as a bankruptcy practitioner. If called as a witness, I could and would testify competently to the facts set forth herein and in the *Memorandum of Law* submitted in support of the Motion (the "**Supporting Memorandum**").

6. Based upon my investigation to date, and as set forth in the allegations contained in the Complaint, I have uncovered evidence that the Defendants have facilitated or otherwise participated in numerous unauthorized transfers of funds from the Debtors' Stripe account during the days after entry of the order for relief in these Chapter 11 Cases. Based on that evidence, I believe the Debtors' estates hold meritorious claims against the Defendants.

7. I believe that each component of the injunctive relief requested in the proposed temporary restraining order attached to the Motion is necessary to avoid irreparable harm to the Debtors' estates and my reorganization efforts. Without such relief, the Debtors will face

irreparable harm, both as a result of the unauthorized transfers that have already taken place, and as a result of any subsequent unauthorized transfers. Moreover, at this critical juncture in these Chapter 11 Cases, it is essential that my focus (and that of my team) remain on stabilizing and preserving the value of the Debtors' businesses. The relief sought is necessary to both of those goals, as it will facilitate my efforts to recover the unauthorized transfers, Stripe will be ordered to respond to directions only from me and my advisors with respect to the Debtors' account, and additional unauthorized transfers will not occur.

I declare under penalty of perjury under the law of the United States of American that the foregoing is true and correct.

Dated: October 8, 2024

/s/ Claudia Z. Springer

Claudia Z. Springer