

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re	Chapter 11
EPIC! CREATIONS, INC., et al.,	Case No. 24-11161-BLS
Debtors.*	(Jointly Administered)
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CLAUDIA Z. SPRINGER,	
Plaintiff,	
v.	Adv. Proc. No. 24-50142-BLS
WELLS FARGO BANK, N.A., et al.,	
Defendants.	

**DECLARATION OF ERIN MCBRIDE**

1. My name is Erin McBride. I am a Litigation Paralegal at Stripe, Inc. (“**Stripe**”). My duties on Stripe’s Legal team include monitoring service of court notices that Stripe receives. I have personal knowledge of the matters set forth in this declaration and am competent to testify to them.

2. I reviewed the two documents attached as exhibits to the complaint filed in this adversary proceeding on October 8, 2024 (the “**E-Mails**”). The first exhibit is a letter from Claudia Z. Springer that is addressed to Trish Walsh, Stripe’s general counsel, at [trish@stripe.com](mailto:trish@stripe.com) for delivery by e-mail. The second exhibit is an e-mail from Catherine L. Steege that is also addressed to Ms. Walsh at [trish@stripe.com](mailto:trish@stripe.com).

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\* The Debtors in these chapter 11 cases (collectively, the “**Debtors**”), 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).



3. Ms. Walsh's e-mail address is [trishw@stripe.com](mailto:trishw@stripe.com), not [trish@stripe.com](mailto:trish@stripe.com). Ms. Walsh does not receive e-mails directed to [trish@stripe.com](mailto:trish@stripe.com). The [trish@stripe.com](mailto:trish@stripe.com) email address was used by an individual who is no longer employed at Stripe. The address is not routinely monitored by Ms. Walsh or anyone else at Stripe.

4. The Corporation Trust Company serves as Stripe's registered agent for service of process within the State of Delaware. That information is available free of charge from a web site maintained by the State of Delaware. Stripe's registered agent has no record of having been served with the E-Mails, notice of this bankruptcy, or other notices from Ms. Springer or her attorneys until October 14, 2014, when Stripe's registered agent received a copy of the summons issued in this case on October 11, 2024.

5. To the best of my knowledge after a good-faith investigation, employees of Stripe first became aware of Ms. Springer's complaint against Stripe and the E-Mails when a news reporter contacted Stripe by e-mail on October 8, 2024 at 4:37 p.m. (Eastern) to ask about them. Attached as **Exhibit A** is a true and correct copy of that e-mail. Note that the time signatures are Pacific time not Eastern time. Note also that although this e-mail was also sent to [trish@stripe.com](mailto:trish@stripe.com), the reporter sent a copy to [media@stripe.com](mailto:media@stripe.com), which is an active and monitored address.

6. After Stripe learned about Ms. Springer's complaint, Stripe acted promptly to engage counsel and freeze payouts from accounts identified as belonging to one or more of the Debtors in this case. In addition to payouts identified in the complaint, one disbursement of \$156,320.30 was released from an account associated with the Debtors on October 8, 2024. There have been no further payouts from accounts known to Stripe as belonging to one or more of the Debtors.

I certify that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated this 17th day of October, 2024.

Signed by:



*Erin McBride*

Erin McBride

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# **EXHIBIT A**

From: **Jonathan Randles (BLOOMBERG/ NEWSROOM/)** <[jrandles5@bloomberg.net](mailto:jrandles5@bloomberg.net)>  
Date: Tue, Oct 8, 2024 at 1:37 PM  
Subject: URGENT: Bloomberg News mentioning Stripe in story about BYJU transfers  
To: <[trish@stripe.com](mailto:trish@stripe.com)>  
Cc: <[media@stripe.com](mailto:media@stripe.com)>

Hello --

I'm a bankruptcy reporter at Bloomberg News. I'm reaching out, on immediate deadline and urgently, about a complaint that was filed today in the Delaware bankruptcy court against Stripe, Wells Fargo and an entity called Whitehat Education, which is purportedly connected to Indian education firm Byju.

A court appointed trustee for Byju's US affiliates says that on September 26 and Oct 1 and Oct 7 Stripe allowed the bankrupt US entities to transfer out \$201,565, \$9,999 and \$482,992 to Whitehat, an Indian affiliate tied to Byju.

The trustee is seeking to claw the funds back and is seeking a temporary restraining order. The complaint is attached, and includes an email from lawyers for the trustee requesting Stripe freeze the relevant account and to clawback the \$482,992.

I'm reaching out to make Stripe aware. If Stripe can provide a comment on the situation or the claims made in the complaint, please let me know ASAP.

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