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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

EPIC! CREATIONS, INC., et al., 1

Case No. 24-11161 (JTD)

Debtors.

(Jointly Administered)

Claudia Z. Springer, Chapter 11 Trustee,

Plaintiff,

VS.

Adv. Pro. No. 24-50142 (JTD)

Stripe, Inc.;

Wells Fargo Bank, National Association; Whitehat Education Technology LLC; and John Does 1-100;

Defendants.

AGREED ORDER FREEZING ACCOUNTS OF BYJU'S BETA, INC.

This matter coming before the Court under certification of counsel of Claudia Z. Springer, as 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, the "Debtors" and, each, a "Debtor"), for entry of an order freezing certain bank accounts of Byju's Beta, Inc. ("Byju's Beta") at Wells Fargo Bank, National Association ("Wells Fargo"), as more fully described below, the Court ORDERS as follows:

¹ 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).



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1. For the duration of the above-captioned chapter 11 cases, and pursuant to Federal

Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendant

Wells Fargo, and all persons acting in concert with Wells Fargo, are immediately enjoined, upon

entry of this Order from transferring any funds out of Byju Beta's Wells Fargo account(s)

(including without limitation, the account ending 5221), and Wells Fargo is ordered to freeze all

activity in all such accounts.

2. This Order shall be promptly filed in the Clerk's office and entered in the record.

3. The terms and conditions of this Order shall be effective as of 6 p.m. (Eastern time)

on October 25, 2024 and is enforceable immediately thereafter.

4. The Chapter 11 Trustee is directed to serve a copy of this Order upon the

Defendants and the registered agent of Byju's Beta.

5. This Court shall retain jurisdiction to hear and determine all matters arising from

or related to the implementation of this Order.

Dated: October 28th, 2024 Wilmington, Delaware JOHN T. DORSEY

UNITED STATES BANKRUPTCY JUDG