

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

In re:

EPIC! CREATIONS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11161 (JTD)

(Jointly Administered)

Claudia Z. Springer, Chapter 11 Trustee,
Plaintiff

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

v.

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

Defendants.

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Wells Fargo Bank, National Association (“Wells Fargo”) in the above-captioned adversary proceeding. Pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned respectfully request that all notices and papers filed or entered in these cases be given to and served upon the following:

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).



Jason D. Evans
Anna C. Yarbrough
**TROUTMAN PEPPER HAMILTON
SANDERS LLP**
301 S. College Street
34th Floor
Charlotte, NC 28202
Telephone: (704) 998-4050
Email: jason.evans@troutman.com
anna.yarbrough@troutman.com

Douglas D. Herrmann
Kenneth A. Listwak
**TROUTMAN PEPPER HAMILTON
SANDERS LLP**
Hercules Plaza, Suite 1000
1313 N. Market Street
Wilmington, Delaware 19899-1709
Telephone: (302) 777-6500
Email: douglas.herrmann@troutman.com
ken.listwak@troutman.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any orders, notices, applications, motions, petitions, pleadings, complaints, demands, disclosure statements, plans of reorganization, or requests, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, electronic mail, hand delivery, telephone, electronic filing, facsimile, or otherwise, in the above-referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither the filing of this *Notice of Appearance and Request for Service of Notices and Papers* (this “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall be deemed, or construed to constitute, a waiver of any substantive or procedural right of Wells Fargo including, without limitation: (i) the right to have an Article III judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a bankruptcy judge may not enter a final order or judgement consistent with Article III of the United States Constitution, (ii) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (iii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iv) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, (v) any objection to the jurisdiction of this Bankruptcy Court for any purpose other

than with respect to this Notice, (vi) any election of remedy, or (vii) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: November 7, 2024
Wilmington Delaware

TROUTMAN PEPPER HAMILTON SANDERS LLP

/s/ Kenneth A. Listwak

Douglas D. Herrmann (DE No. 4872)

Kenneth A. Listwak (DE No. 6300)

Hercules Plaza, Suite 1000

1313 N. Market Street

Wilmington, Delaware 19899-1709

Telephone: (302) 777-6500

Email: douglas.herrmann@troutman.com

ken.listwak@troutman.com

-and-

Jason Evans

301 S. College Street

34th Floor

Charlotte, NC 28202

Telephone: (704) 998-4050

Email: jason.evans@troutman.com

Counsel for Wells Fargo Bank, National Association

CERTIFICATE OF SERVICE

I, Kenneth A. Listwak, hereby certify that on the 7th of November 2024, I caused the foregoing *Notice of Appearance and Request for Service of Notices and Papers* to be served by email upon the parties set forth below; and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

(Proposed Counsel to the Trustee)

Henry J. Jaffe and Joseph C. Barsalona II
PASHMAN STEIN WALDER HAYDEN, P.C.
824 North Market Street
Suite 800
Wilmington, DE 07601
jbarsalona@pashmanstein.com
hjaffe@pashmanstein.com

(Counsel to Stripe, Inc.)

Brett D. Fallon
FAEGRE DRINKER BIDDLE & REATH LLP
222 Delaware Avenue
Suite 1410
Wilmington, DE 19801
brett.fallon@faegredrinker.com

(Proposed Counsel to the Trustee)

Catherine Steege, Melissa Root, and
William A. Williams
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, Illinois 60654
csteege@jenner.com
mroot@jenner.com
wwilliams@jenner.com

Nataliia Valiavska and Prupa Rupa, Directors

Whitehat Education Technology LLC
131 Continental Drive
Suite 301
Newark, DE 19713
nataliia.valiavska@whitehatjr.com
prupa.rupa@whitehatjr.com

/s/ Kenneth A. Listwak

Kenneth A. Listwak