

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

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , <sup>1</sup>	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50233 (JTD)
Plaintiff,	(Jointly Administered)
vs.	
Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,	
Defendants.	

**TRUSTEE’S MOTION FOR  
ENTRY OF TEMPORARY RESTRAINING ORDER**

Plaintiff Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the Estates 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”) brings this motion (the “Motion”) for entry of a temporary restraining order (the “TRO Order”) pursuant to 11 U.S.C. § 105(a) and Rule 7065 of the Federal Rules of Bankruptcy Procedure, which relief shall remain in effect until the

<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).



Court can hold a hearing to consider the entry of a preliminary injunction in connection with the Motion.

1. The Motion is intended to maintain the status quo by:

(a) temporarily enjoining Defendant Google, LLC (“Google”), and all persons acting in concert with Google, (i) from accepting, authorizing, or implementing any changes to the Google Accounts<sup>2</sup> by any entity or person other than the Trustee; and (ii) from transferring any funds Google is holding related to the Debtors including in the Google Accounts to any entity or person other than the Trustee;

(b) directing Google to provide the Trustee with complete control of the Google Accounts and account access along with all records of the Google Accounts;

(c) temporarily enjoining Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath, and all persons acting in concert with any of them, from exercising ownership over, or transferring to any party other than the Trustee, the Debtors’ applications, data, project, funds, or any other information or property of the Debtors; and

(d) directing Defendant Voizzit Information Technology LLC to transfer to the Trustee at instructions provided by the Trustee the Debtors’ applications, data, project, funds, or any other information or property of the Debtors; given that any such transfer to Voizzit Information Technology LLC was void *ab initio* and a legal nullity, such that the technical return transfer to the Trustee maintains the status quo.

(e) directing Google to take any further action that is reasonably necessary to enforce the relief granted to the Trustee.

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<sup>2</sup> A capitalized term used but not defined herein shall have the meaning ascribed to it in the complaint initiating this adversary proceeding.

2. This Motion is based on *Trustee's Memorandum of Law in Support of Motion for Temporary Restraining Order* (the "Memorandum"), filed concurrently herewith, all evidence to be presented at the hearing(s) on the Motion, and all matters of record in the above-captioned adversary proceeding and the above captioned bankruptcy case.

3. Pursuant to 11 U.S.C. § 105(a) and/or Bankruptcy Rule 7065, the Court should enter the Proposed Order enclosed as **Exhibit A** to this Motion, and granting such further relief as the Court deems just and appropriate.

Dated: November 18, 2024  
Wilmington, Delaware

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

/s/ Joseph C. Barsalona II

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**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
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In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , <sup>1</sup>	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50233 (JTD)
Plaintiff,	(Jointly Administered)
vs.	
Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,	
Defendants.	

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION  
FOR A TEMPORARY INJUNCTION**

Upon consideration of the *Chapter 11 Trustee’s Motion for Temporary Restraining Order* (the “Motion”) <sup>2</sup> filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Chapter 11 Trustee”) of the Estates of the above-captioned debtors (the “Debtors”), the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”); and the Court having reviewed the Motion, and its supporting papers; and the Court having held a hearing on

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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).

<sup>2</sup> Capitalized terms used herein and not defined shall have the meaning given to them in the Motion.

November 19, 2024 (the “Hearing”); and the Court having considered all evidence and arguments presented at the Hearing; the Court finds and concludes as follows:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A), (E), and (O).

B. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409(a).

C. Notice of the Motion was sufficient under the circumstances.

D. The legal and factual bases set forth in the Motion and the Memorandum, the evidence in support of the Motion, and at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to Google is outweighed by the harm to the Trustee and the Debtors’ estates if the relief sought in the Motion is not granted, and that the balance of the equities and the public interest support granting the Motion.

For the reasons stated on the record at the Hearing, it is hereby **ORDERED THAT:**

1. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendant Google, LLC (“Google”), and all persons acting in concert with Google is enjoined: (i) from accepting, authorizing, or implementing any changes to the Epic! Creations, Inc. (“Epic”) accounts at Google Workspace, Google Cloud, Google Play or any other Epic account at Google and the Tangible Play, Inc. (“Tangible Play”) accounts at Google Workspace, Google Cloud, Google Play or any other Tangible Play account at Google (collectively, the “Google Accounts”) by any entity or person

other than the Trustee; and (ii) from transferring any funds Google is holding related to the Debtors including in the Google Accounts to any entity or person other than the Trustee.

2. Google is directed to provide the Trustee with complete control of the Google Accounts and account access along with all records of the Google Accounts.

3. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath, and all persons acting in concert with any of them, are enjoined from exercising ownership over, or transferring to any party other than the Trustee, the Debtors' applications, data, project, funds, or any other information or property of the Debtor.

4. Defendant Voizzit Information Technology LLC is directed to transfer to the Trustee at instructions provided by the Trustee the Debtors' applications, data, project, funds, or any other information or property of the Debtors; given that any such transfer to Voizzit Information Technology LLC was void *ab initio* and a legal nullity, such that the technical return transfer to the Trustee maintains the status quo.

5. Directing Google to take any further action that is reasonably necessary to enforce the relief granted to the Trustee in this Order.

6. The Court shall hold a hearing on December [●], 2024, at [●] p.m. (Eastern time) to consider the entry of a preliminary injunction in connection with the Motion (the "PI Hearing"). Objections to the Motion shall be filed and served no later than three (3) business days prior to the PI Hearing. Replies may be filed by 4:00 p.m. (Eastern time) one (1) business day prior to the PI Hearing.

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

8. The terms and conditions of this Order shall be effective as of [●] (Eastern Time) on November 19, 2024 and this Order shall be enforceable immediately thereafter.

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

10. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.