

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

In re:

EPIC! CREATIONS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11161 (JTD)

(Jointly Administered)

Claudia Z. Springer, Chapter 11 Trustee,

Plaintiff,

vs.

Google LLC,  
Voizzit Technology Private Ltd.,  
Voizzit Information Technology LLC,  
Vinay Ravindra,  
Rajendran Vellapalath,

Defendants.

Adv. Pro. No. 24-50233 (JTD)

(Jointly Administered)

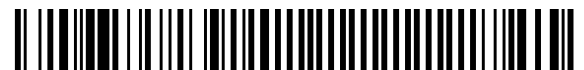
**Related to Adv. D.I. 2, 3**

**NOTICE OF FILING OF PROPOSED ORDER GRANTING  
CHAPTER 11 TRUSTEE'S MOTION FOR A PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that on November 18, 2024, Plaintiff Claudia Z. Springer, Esq., in her capacity 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, collectively, the "Debtors") filed the *Trustee's Motion for Entry of Temporary Restraining Order* [D.I. 2] (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that on November 19, 2024, the Court entered the *Order Granting Chapter 11 Trustee's Motion for a Temporary Injunction* [D.I. 14] (the "TRO"), scheduling a preliminary injunction hearing on December 3, 2024, at 9:00 a.m. (ET) (the "Preliminary Injunction Hearing").

<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).



**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit A** is a proposed *Order Granting Chapter 11 Trustee's Motion for a Preliminary Injunction* (the "Proposed Preliminary Injunction Order").

**PLEASE TAKE FURTHER NOTICE** that the Plaintiffs intend to present the Proposed Preliminary Injunction Order at the Preliminary Injunction Hearing. The Plaintiff reserves the right to modify the Proposed Preliminary Injunction Order at or prior to the Preliminary Injunction Hearing.

Dated: December 2, 2024  
Wilmington, Delaware

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

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**EXHIBIT A**

**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 (JTD)  (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,  Plaintiff,  vs.  Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,  Defendants.	Adv. Pro. No. 24-50233 (JTD)  (Jointly Administered)  <b>Related to Adv. D.I. 2, 3</b>

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

Upon consideration of the *Chapter 11 Trustee’s Motion for Preliminary Injunction* [Adv. D.I. 2] (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 (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

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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.

Defendants Google LLC and Vinay Ravindra having failed to object to the entry of this preliminary injunction by the deadline set by the Court and Defendants Voizzit Information Technology LLC and Voizzit Technology Private LLC having filed an improper pro se objection to the preliminary injunction after the deadline for doing so, which the Court shall not consider, *see Rowland v. California Ministries Colony*, 506 U.S. 194 (1993); and Rajendran Vellapalath having also filed a pro se objection after the deadline, which objection is overruled, as improperly filed; and the Court having considered all evidence and argument presented in support of the preliminary injunction; 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 the above-captioned defendants (the “Defendants”) 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(a), as made applicable herein by Bankruptcy Rule 7065, Defendant Google, LLC (“Google”),

and each person 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 Store or any other Epic account at Google, the Tangible Play, Inc. (“Tangible Play”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Tangible Play account at Google, or Neuron Fuel, Inc. (“Neuron Fuel”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Neuron Fuel 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. Defendant 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, including, but not limited to, the following email extensions, domain names, and projects, and any such other email extensions, domain names, and projects as the Trustee may provide to Google:

**Google Workspace accounts for the following Domain Names:**

@getepic.com  
 @tangibleplay.com  
 @playosmo.com  
 @tynker.com

**Google Cloud accounts with the following project info:**

Project ID: epic-jenkins  
 Project Number: 1011349847158

**Google Play Store accounts for the entities below (tax id numbers to be provided by the Trustee to Google to the extent she has them)**

Epic! Creations, Inc.  
 Epic Creations Inc.  
 StoryMagic, Inc.  
 Tangible Play Inc  
 Neuron Fuel, Inc.  
 Voizzit Technology Private Limited

3. Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath (the “Voizzit Defendants”) shall provide the Trustee and Google with a complete list of all accounts, assets, email extensions, projects, entity names, or other credentials relating in any way to the Google Accounts that were transferred by or to one or more of the Voizzit Defendants or individuals or entities working in concert with them from June 4, 2024 to present, and shall facilitate the transfer of any such email extensions, projects, entity names, or other credentials from the Voizzit Defendants or individuals or entities under their control and to the Trustee.

4. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(a), as made applicable herein by Bankruptcy Rule 7065, the Voizzit Defendants, 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 Estates, or from taking any action to impair in any way the applications, data, projects, funds, or any other information or property of the Estates, including but not limited to deleting any information or metadata.

5. 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.

6. To the extent Google identifies accounts, projects, or other credentials or service other than those listed in Paragraph 2 hereof or provided by the Voizzit Defendants pursuant to Paragraph 4, Google shall, within two (2) business day of identifying such account, project, or

other credentials or service, provide notice to counsel for the Trustee, and if the Trustee cannot provide Google with reasonable confirmation that such account, project, or other credential or service is property of the Estates, Google shall suspend all access to such account, project, or other credential or service and Google and the Trustee shall seek immediate direction from this Court.

7. The Court finds it necessary and appropriate for Google to take the above actions and that, by doing so, Google shall not be held liable for any violations of the Stored Communications Act, 18 U.S.C. Chapter 121 §§2701-2713, as a result of its efforts to comply with this Order.

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

9. The terms and conditions of this Order shall be enforceable immediately thereafter.

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

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