Case 24-50233-JTD Doc 30 Filed 12/02/24 Pane 1 of R Docket #0030 Date Filed: 12/2/2024

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,

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.

NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON DECEMBER 3, 2024 AT 9:00 A.M. (ET)

This proceeding will be conducted remotely via Zoom. Please refer to Judge **Dorsey's Chambers Procedures and the Court's website** (http://www.deb.uscourts.gov/ecourt-appearances) for information on the method of allowed participation (video or audio), Judge Dorsey's expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.



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).

Amended items appear in bold and italicized.

MATTERS GOING FORWARD

1. Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 244, filed 11/04/2024]

Objection Deadline: November 15, 2024 at 11:59 p.m. (ET).

Responses Received:

- a. Voizzit's (A) Emergency Motion to Adjourn the Hearing Scheduled for November 21, 2024 and (B) Reply to the Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 288, filed 11/16/2024]
- b. Declaration of Rajendran Vellaphalth in Support of Voizzit's (A) Emergency Motion to Adjourn the Hearing Scheduled for November 21, 2024 and (B) Reply to the Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 289, filed 11/16/204]

Related Pleadings:

- a. Chapter 11 Trustee's Motion for Entry of an Order Shortening Notice of Hearing on the Trustees Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 245, filed 11/04/2024]
- b. Order Shortening Notice of Hearing on Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 247, filed 11/05/2024]
- c. Notice of Hearing on Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 248, filed 11/05/2024]

- d. Certificate of Service re Documents served on or before November 5, 2024 [D.I. 255, filed 11/07/2024]
- e. Declaration of Jacob Grall in Support of Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 256, filed 11/07/2024]
- f. Declaration of Chatura Randeniya In Support of (A) the Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief; and (B) the Order Setting a Hearing on the Motion [D.I. 259, filed 11/11/2024]
- g. Notice of Filing of Proof of Service in India of Trustee's Stay Enforcement Motion [D.I. 260, filed 11/11/2024]
- h. Notice of Filing of Revised Proposed Order Granting Trustee's Stay Enforcement Motion [D.I. 267, filed 11/12/2024]
- i. Letter from Pakaj Srivastava re Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 270, filed 11/12/2024]
- j. Certificate of Counsel Regarding Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 274, filed 11/12/2024]
- k. Order Granting in Part Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 276, filed 11/12/2024]
- 1. Trustee's (A) Objection to Voizzit's Emergency Motion to Adjourn the Hearing Scheduled for November 21, 2024 and (B) Reply in Support of Trustees Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 295, filed 11/18/2024]

- m. GLAS Trust Company LLC Witness List for Hearing on November 21, 2024 at 2:30 p.m. (ET) [D.I. 304, filed 11/19/2024]
- n. Chapter 11 Trustee's Witness and Exhibit List for Hearing on November 21, 2024 at 2:30 p.m. [D.I. 305, filed 11/19/2024]
- o. Declaration of Will Hailer [D.I. 314, filed 11/20/2024]
- p. Supplemental Declaration of Jacob Grall in Support of Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 318, filed 11/21/2024]
- q. Chapter 11 Trustee's Amended Witness and Exhibit List for Hearing on November 21, 2024 at 2:30 p.m. [D.I. 319, filed 11/21/2024]
- r. Glas Trust Company LLC Exhibit List for Hearing on November 21, 2024 at 2:30 p.m. (ET) [D.I. 320, filed 11/21/2024]
- s. Notice of Filing of Proposed Judgement Order Awarding Attorney's Fees and Other Damages in Connection with the Trustee's Emergency Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Declaring Violations of the Automatic Stay to be Void *Ab Initio*, (III) Awarding Fees, Expenses, and Punitive Damages, and (IV) Granting Related Relief [D.I. 321, filed 11/21/2024]
- t. Chapter 11 Trustee's Second Amended Witness and Exhibit List for Hearing on November 21, 2024 at 2:30 p.m. [D.I. 324, filed 11/21/2024]
- u. Chapter 11 Trustee's Third Amended Witness and Exhibit List for Hearing on November 21, 2024 at 2:30 p.m [D.I. 326, filed 11/21/2024]
- v. GLAS Trust Company LLC's Notice of Intent to Raise Issues on Foreign Law Pursuant to Federal Rule of Civil Procedure 44.1 [D.I. 351, filed 11/29/2024]

Status: This matter is going forward.

Trustee's Motion for Entry of Temporary Restraining Order [Adv. D.I. 2, filed 11/18/2024]
 Objection Deadline to Preliminary Injunction: November 26, 2024 at 11:59 p.m. (ET).
 Responses Received:

- a. Voizzit Information Technology LLC, Voizzit Technology Private Limited and Rajendran Vellapalath's Brief in Opposition to Preliminary Injunction [Adv. D.I. 24, filed 12/01/2024]
- b. Declaration of Rajendran Vellapalth In Support of Voizzit Information Technology LLC, Voizzit Technology Private Limited and Rajendran Vellapalath's Brief in Opposition to Preliminary Injunction [Adv. D.I. 25, filed 12/01/2024]

Related Documents:

- a. Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, Turnover of Estate Property of Records, and to Enforce the Automatic Stay [Adv. D.I. 1, filed 11/18/2024]
- b. Declaration of Jacob Grall in Support of Motion for Entry of Temporary Restraining Order and Preliminary [Adv. D.I. 3, filed 11/18/2024]
- c. Chapter 11 Trustee's Memorandum of Law in Support of Chapter 11 Trustee's Motion for Entry of Temporary Restraining Order [Adv. D.I. 4, filed 11/18/2024]
- d. Notice of Hearing Regarding Trustee's Motion for Entry of Temporary Restraining Order [Adv. D.I. 5, filed 11/18/2024]
- e. Certificate of Counsel Regarding Contested Order Granting Chapter 11 Trustee's Motion for a Temporary Injunction [Adv. D.I. 13, filed 11/19/2024]
- f. Order Granting Chapter 11 Trustee's Motion for a Temporary Injunction [Adv. D.I 14, filed 11/19/2024]
- g. Letter from Potter Anderson & Corroon LLP to The Honorable John T. Dorsey regarding courtesy filings [Adv. D.I. 26, filed 12/01/2024]
- h. Chapter 11 Trustee's Emergency Motion to Strike Tardy Pro Se Opposition to Preliminary Injunction [Adv. D.I. 28, filed 12/02/2024] [See item 6 below]
- i. Notice of Filing of Proposed Order Granting Chapter 11 Trustee's Motion for a Preliminary Injunction [Adv. D.I. 29, filed 12/02/2024]

Status: This matter will be going forward.

3. Potter Anderson & Corroon LLP's Motion for leave to Withdraw as Counsel to Voizzit [D.I. 336, filed 11/25/2024]

Objection Deadline: December 3, 2024 at 9:00 a.m. (ET).

Responses Received: None.

Related Documents:

- a. Potter Anderson & Corroon LLP's Motion for Entry of an Order Shortening the Notice and Objection Periods with Respect to its Motion for Leave to Withdraw as Counsel to Voizzit [D.I. 337, filed 11/25/2024]
- b. Order Shortening the Notice and Objection Periods with Respect to Potter Anderson & Corroon LLP's Motion for Leave to Withdraw as Counsel to Voizzit [D.I. 344, filed 11/27/2024]

Status: This matter will be going forward.

4. Chapter Trustee's Emergency Motion for Sanctions Against Voizzit Technology Private, Ltd., Voizzit Information Technology Private, Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, and Think & Learn Private Ltd. for their Continuing Failure to Comply with the Automatic Stay [D.I. 340, filed 11/26/2024]

Objection Deadline: December 3, 2024 at 9:00 a.m. (ET).

Responses Received: None.

Related Documents:

- a. Chapter 11 Trustee's Motion for Entry of an Order Shortening Notice of Hearing on (I) the Chapter 11 Trustee's Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court's November 19 Order; and (II) the Chapter Trustee's Emergency Motion for Sanctions Against Voizzit Technology Private, Ltd., Voizzit Information Technology Private, Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, and Think & Learn Private Ltd. for their Continuing Failure to Comply with the Automatic Stay [D.I. 341, filed 11/26/2024]
- b. Order Shortening Notice of Hearing on (I) the Chapter 11 Trustee's Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court's November 19 Order; and (II) the Chapter Trustee's Emergency Motion for Sanctions Against Voizzit Technology Private, Ltd., Voizzit Information Technology Private, Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, and Think & Learn Private Ltd. for their Continuing Failure to Comply with the Automatic Stay [D.I. 342, filed 11/27/2024]

Status: This matter will be going forward.

5. Chapter 11 Trustee's Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court's November 19 Order [Adv. D.I. 18, filed 11/26/2024]

Objection Deadline: December 3, 2024 at 9:00 a.m. (ET).

Responses Received: None.

Related Documents:

- a. Chapter 11 Trustee's Motion for Entry of an Order Shortening Notice of Hearing on (I) the Chapter 11 Trustee's Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court's November 19 Order; and (II) the Chapter Trustee's Emergency Motion for Sanctions Against Voizzit Technology Private, Ltd., Voizzit Information Technology Private, Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, and Think & Learn Private Ltd. for their Continuing Failure to Comply with the Automatic Stay [Adv. D.I. 19, filed 11/26/2024]
- b. Order Shortening Notice of Hearing on (I) the Chapter 11 Trustee's Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court's November 19 Order; and (II) the Chapter Trustee's Emergency Motion for Sanctions Against Voizzit Technology Private, Ltd., Voizzit Information Technology Private, Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, and Think & Learn Private Ltd. for their Continuing Failure to Comply with the Automatic Stay [Adv. D.I. 20, filed 11/27/2024]

Status: This matter will be going forward.

6. Chapter 11 Trustee's Emergency Motion to Strike Tardy Pro Se Opposition to Preliminary Injunction [Adv. D.I. 28, filed 12/02/2024]

Objection Deadline: December 3, 2024 at 9:00 a.m. (ET).

Responses Received: None.

Related Documents: None.

Status: This matter will be going forward.

Dated: December 2, 2024 Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Joseph C. Barsalona II

Henry J. Jaffe (No. 2987)

Joseph C. Barsalona II (No. 6102)

Alexis R. Gambale (No. 7150)

824 N. Market Street, Suite 800

Wilmington, DE 19801

Telephone: (302) 592-6496

Email: hjaffe@pashmanstein.com

jbarsalona@pashmanstein.com

agambale@pashmanstein.com

-and-

JENNER & BLOCK LLP

Catherine Steege (admitted *pro hac vice*)
Melissa Root (admitted *pro hac vice*)
William A. Williams (admitted *pro hac vice*)
353 N. Clark Street
Chicago, Illinois 60654

Telephone: (312) 923-2952 Email: csteege@jenner.com mroot@jenner.com wwilliams@jenner.com

Co-Counsel to the Trustee