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

| In re:   | Chapter 11                        |
|--|-----------------------------------|
| EPIC! CREATIONS, INC., et al., <sup>1</sup>  | Case No. 24-11161 (JTD)           |
| Debtors.   | (Jointly Administered)            |
| Claudia Z. Springer, Chapter 11 Trustee,   |                                   |
| Plaintiff,   |                                   |
| v.   | Adv. Pro. No. 24-50142 (JTD)      |
| Stripe, Inc.;<br>Wells Fargo Bank, National Association;<br>Whitehat Education Technology LLC; and<br>John Does 1-100; | Re: Adv. Pro. D.I. 1, 11, 32 & 36 |
| Defendants.  |                                   |

## ORDER APPROVING STIPULATION EXTENDING THE TIME FOR DEFENDANT STRIPE, INC. TO ANSWER OR TO OTHERWISE RESPOND TO THE <u>COMPLAINT FILED BY CLAUDIA Z. SPRINGER, CHAPTER 11 TRUSTEE</u>

Upon the Certification of Counsel and the *Stipulation Pursuant to Local Rule 7012-2 Extending Defendant Stripe, Inc. 's ("Stripe") Time to Respond to the Complaint* (the "Stipulation")<sup>2</sup> entered into between the above captioned plaintiff (the "<u>Plaintiff</u>") and Stripe, a copy of which is attached hereto as <u>Exhibit A</u>; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of the Chapter 11 Cases in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28

<sup>&</sup>lt;sup>2</sup> Terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the *Certification of Counsel Submitting Agreed Order Extending Stripe, Inc.'s Time to Respond to the Complaint* filed with the Court seeking the entry of this Order.



<sup>&</sup>lt;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).

U.S.C. § 157(b); and it appearing that sufficient notice of the Stipulation has been given; and after due deliberation; and good and sufficient cause appearing thereof;

## **IT IS HEREBY ORDERED THAT:**

1. The Stipulation is **APPROVED**.

2. The terms and provisions of the Stipulation shall immediately be effective and enforceable upon entry of this Order.

3. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order and the Stipulation.

JOHN T. DORSEY UNITED STATES BANKRUPTCY

Dated: December 4th, 2024 Wilmington, Delaware

# <u>Exhibit A</u>

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

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| EPIC! CREATIONS, INC., et al., <sup>1</sup>  | Case No. 24-11161 (JTD)           |
| Debtors.   | (Jointly Administered)            |
| Claudia Z. Springer, Chapter 11 Trustee,<br>Plaintiff,<br>v.   | Adv. Pro. No. 24-50142 (JTD)      |
| Stripe, Inc.<br>Wells Fargo Bank, National Association<br>Whitehat Education Technology LLC<br>John Does 1-100 | Re: Adv. Pro. D.I. 1, 11, 32 & 36 |
| Defendants.  |                                   |

## STIPULATION PURSUANT TO LOCAL RULE 7012-2 EXTENDING DEFENDANT STRIPE, INC.'S TIME TO RESPOND TO THE COMPLAINT

The above-captioned plaintiff ("<u>Plaintiff</u>") and defendant Stripe, Inc. ("<u>Stripe</u>") by and through their undersigned counsel, pursuant to Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court of the District of Delaware (the "<u>Local Rules</u>"), hereby stipulate as follows:

1. On October 14, 2024, the Plaintiff served a Summons, along with a copy of the Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, and

<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).

Avoidance and Recovery under 11 U.S.C. §§ 549 and 550 (the "Complaint"), on Stripe. [Adv. Pro.

D.I. 32]

2. On November 8, 2024, the Plaintiff and Stripe entered into the *Stipulation Pursuant* 

to Local Rule 7012-2 Extending Stripe's Time to Respond to the Complaint [Adv. Pro. D.I. 36], extending the time for Stripe to file an answer, move, or otherwise respond to the Complaint through and including December 9, 2024.

3. Pursuant to Local Rule 7012-2,

[t]he deadline to plead or move in response to a complaint or other pleading in an adversary proceeding may be extended for a period of up to twenty-eight (28) days by stipulation of the parties docketed with the Court or, for a longer period of time, by order of the Court.

Del. Bankr. L.R. 7012-2.

## IT IS HEREBY STIPULATED AND AGREED by the parties that:

4. The time within which Stripe may file an answer, move, or otherwise respond to

the Complaint is hereby extended through and including January 9, 2025.

5. This Stipulation is without prejudice to the Plaintiff's or Stripe's substantive rights.

## **IT IS SO STIPULATED**:

Dated: December 3, 2024

## ESBROOK P.C.

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-and-

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Counsel for Stripe, Inc.

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

<u>/s/ Alexis R. Gambale</u> Henry J. Jaffe (DE Bar No. 2987) Joseph C. Barsalona II (DE Bar No. 6102) Alexis R. Gambale (DE Bar No. 7150) 824 North Market Street Suite 800 Wilmington, DE 07601 Telephone: (302) 592-6497 Email: hjaffe@pashmanstein.com jbarsalona@pashmanstein.com

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