

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , ¹	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50280 (JTD)
Plaintiff,	(Jointly Administered)
vs.	
Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath,	Re: Adv. D.I. 2, 3 & 12
Defendants.	

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

PLEASE TAKE NOTICE that on December 10, 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 and Preliminary Injunction* [D.I. 2] (the “Motion”).

PLEASE TAKE FURTHER NOTICE that on December 11, 2024, the Court entered the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* [D.I. 12] (the “TRO”), scheduling a preliminary injunction hearing on December 19, 2024, at 1:00 p.m. (ET) (the “Preliminary Injunction Hearing”).

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

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).



PLEASE TAKE FURTHER NOTICE that the, with permission of the Court, Plaintiffs intend to present the Proposed Preliminary Injunction Order to the Court via Certificate of No Objection as the Trustee received no answer, objection or other responsive pleading to the Motion by the December 16, 2024, 11:59 p.m. (ET), objection deadline.

Dated: December 17, 2024
Wilmington, Delaware

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EXHIBIT A

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

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , ¹	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50280 (JTD)
Plaintiff,	(Jointly Administered)
vs.	
Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath,	Re. Adv. D.I. 2, 3, 12
Defendants.	

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

Upon consideration of the *Chapter 11 Trustee’s Motion for Entry of a Preliminary Injunction* (the “Motion”)² filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Trustee”) of the above-captioned debtors (the “Debtors”), and the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”); the Court having reviewed the Motion, and the Declaration filed in support of the Motion; and each of the above-captioned defendants (the “Defendants”) having failed to object to the entry of this preliminary injunction by

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² Capitalized terms used herein and not defined shall have the meaning given to them in the *Chapter 11 Trustee’s Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*.

the deadline set by the Court; 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, the *Order Granting Chapter 11 Trustee's Motion For Entry Of Temporary Restraining Order* [Adv. D.I. 12], and the deadline to object to entry of this preliminary injunction was sufficient under the circumstances as to each Defendant.

D. The legal and factual bases set forth in the Motion, the *Chapter 11 Trustee's Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*, the *Declaration of Jacob Grall in Support of Motion for Temporary Restraining Order* and other evidence submitted in support of the Motion, and the arguments presented at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Voizzit Defendants' filing of a complaint and related requests for relief (collectively, the "India Complaint") against the Trustee on or around November 20, 2024 with the Commercial Court of Ernakulam in India, as reflected in the materials attached as Exhibit A to the Trustee's complaint in the Adversary Proceeding, violated the automatic stay in effect in these Chapter 11 Cases by operation of section 362(a) of the Bankruptcy Code.

F. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Debtors' estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to 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.

Based on the foregoing findings, it is hereby DECLARED and ORDERED THAT:

1. Within seven (7) days after entry of this Order, the Voizzit Defendants shall take all necessary steps to withdraw or dismiss the India Complaint and all claims asserted therein.

2. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(a), as made applicable herein by Bankruptcy Rule 7065, each Defendant, and all persons acting in concert or participation with any Defendant, are enjoined from taking any act to continue prosecuting or otherwise litigating the claims asserted in the India Complaint or from commencing, prosecuting, or otherwise continuing any lawsuit or other proceeding regarding the Trustee, the Debtors, or property of their estates in any other court, tribunal, or other adjudicative body or entity other than this Court.

3. Until further order from the Court, the website domains www.getepic.com and www.playosmo.com and all ancillary websites and applications are the property of the Debtors' estates and within the exclusive jurisdiction of this Court. Any actions taken in respect thereof must be with the Trustee's and/or this Court's consent.

4. This Order shall be promptly filed in the Clerk's office and entered in the record. The terms and conditions of this Order shall be effective as of 8:00 a.m. (Eastern Time), December 18, 2024, and is enforceable immediately thereafter. The Trustee is directed to serve a copy of this Order upon the Defendants.

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