

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

EPIC! CREATIONS, INC., *et al.*,¹

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)

Re: Adv. Pro. D.I. 1, 14, 44 & 45

**SECOND STIPULATION EXTENDING TRUSTEE'S TIME TO OBJECT OR
OTHERWISE RESPOND TO DEFENDANT GOOGLE LLC'S
MOTION TO DISMISS THE COMPLAINT**

The above-captioned plaintiff ("Plaintiff") and defendant Google, LLC ("Google") by and through their undersigned counsel hereby stipulate as follows:

1. On November 14, 2024, the Plaintiff filed the *Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, Turnover of Estate Property and Records*,

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).



and to Enforce the Automatic Stay (the “Complaint”), naming Google as a defendant. *See* Adv. Pro. D.I. 1.

2. On November 25, 2024, the Plaintiff served a Summons, along with a copy of the Complaint, on Google. *See* Adv. Pro. D.I. 37.

3. On December 23, 2024, Google filed its *Motion to Dismiss the Complaint* (the “Motion to Dismiss”). *See* Adv. Pro. D.I. 44.

4. On January 6, 2025, Plaintiff filed the *Stipulation Extending Trustee's Time to Object or Otherwise Respond to Defendant Google LLC's Motion to Dismiss the Complaint* (the “First Stipulation”) whereby the Plaintiff’s time to file an objection or otherwise respond to the Motion to Dismiss was extended through and including January 10, 2025. *See* Adv. Pro. D.I. 45.

5. **IT IS HEREBY STIPULATED AND AGREED** by the parties that:

6. The time within which Plaintiff may file an objection or otherwise respond to the Motion to Dismiss is hereby further extended through and including January 15, 2025.

7. This Stipulation is without prejudice to the Plaintiff’s or Google’s substantive rights.

IT IS SO STIPULATED:

Dated: January 10, 2025

WHITE AND WILLIAMS LLP

/s/ Michael Ingrassia
Michael Ingrassia (No. 7068)
600 North King Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 467-4503
Email: ingrassiam@whiteandwilliams.com

-and-

James C. Vandermark, Esq. (admitted *pro hac vice*)
WHITE AND WILLIAMS LLP
1650 Market Street, Suite 1800
Pennsylvania, PA 19103
Telephone: (215) 864-6857
Email: vandermarkj@whiteandwilliams.com

Counsel for Google, LLC

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale
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
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

Counsel to the Chapter 11 Trustee