

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

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , <sup>1</sup>	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, and Rajendran Vellapalath,	
Defendants.	

**DECLARATION OF CLAUDIA Z. SPRINGER IN SUPPORT OF  
AN ORDER OF CONTEMPT AGAINST DEFENDANTS VOIZZIT  
TECHNOLOGY PRIVATE LTD, VOIZZIT INFORMATION  
TECHNOLOGY LLC, VINAY RAVINDRA AND RAJENDRAN VELLAPALATH**

I, Claudia Z. Springer, hereby declare under penalty of perjury that the following is true to the best of my knowledge, information, and belief:

1. I am the duly appointed chapter 11 trustee (the “Trustee”) for the Debtors, Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel, Inc.”), and Tangible Play, Inc. (“Tangible Play,” with Epic and Neuron Fuel, together the “Debtors”). The statements in this Declaration are based on my personal knowledge and information supplied or verified by the

<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).



241116125011700000000005

Trustee's professionals and my review of the Debtors' business records, bank records, and other relevant documents. If called as a witness, I could and would testify competently to the facts set forth herein.

2. I am also a principal in the Philadelphia office of Novo Advisors, LLC ("Novo"), a restructuring-focused consulting firm. Prior to joining Novo in 2021, I practiced bankruptcy law for more than forty (40) years, most recently as a partner at Reed Smith LLP and prior to that as an associate and then partner at Duane Morris LLP.

3. The Debtors are three formerly unaffiliated U.S.-based education technology companies that develop and distribute three separate lines of educational products. Between 2019 and 2021, each Debtor was acquired by Think & Learn Pvt. Ltd. d/b/a Byju's ("T&L"), an Indian corporation founded by Byju Raveendran in 2011 with a stated purpose of providing accessible education technology.

4. Debtor Epic owns and distributes the leading reading application for children at home, at school, and on the go. Through its eponymous application, which is used in over eighty percent (80%) of U.S. public elementary schools, Epic provides electronic books and other educational materials to students in kindergarten through eighth grade via a subscription-based service. Epic was founded in 2012 and was acquired by T&L in July 2021 for a purported purchase price of approximately \$500 million.

5. Debtor Tangible Play develops and sells a variety of educational gaming products, including its well-known Osmo line of products, which use a combination of physical and digital components to engage children in augmented reality-based educational games and experiences. Tangible Play was founded in 2013 and was acquired by T&L in January 2019 for a purported purchase price of approximately \$120 million.

6. Debtor Neuron Fuel operates a subscription-based educational platform known as Tynker that provides gamified coding lessons to children with over one hundred million registered users across the globe. Neuron Fuel was founded in 2012 and was acquired by T&L in September 2021 for a purported purchase price of approximately \$200 million.

7. Since my appointment on September 23, 2024, my professionals and I have been focused on stabilizing the Debtors' businesses. As part of those efforts, I instructed my financial advisors at Novo to reach out to the tech companies that I understood provided the services necessary for the Debtors' operations and where the Debtors' various internet platforms and services were available, including Google, Apple, Stripe, Cloudflare, Github, and others, to ensure that these entities would transfer all control over these accounts to me and those working with me. This step was particularly important for these Debtors because T&L and certain of the Debtors' now former employees were not cooperating with my efforts to perform my duties as trustee and I discovered that funds in the Debtors' accounts were being transferred to non-Debtor entities (including the Voizzit Defendants or certain of them) without my consent or knowledge. As a result of these contacts, I came to learn that Voizzit Technology Private Ltd, Voizzit Information Technology LLC, and Rajendran Vellapalath (collectively, the "Voizzit Defendants"), as well as Vinay Ravindra (who I also understand is BYJU's Chief Content Officer), were actively working with Byju Raveendran to take control of the on-line platforms, e-mail accounts, and programs that are crucial to the Debtors' operations.

8. Each time I learned of a new theft of estate property, I instructed my counsel to file the appropriate pleadings or motions necessary to unwind the taking of estate assets and to obtain appropriate relief. To date, my counsel has been required to file three (3) different adversary proceedings and related emergency TRO motions with respect to the Debtors' Stripe account (Adv.

No. 24-50123), Google accounts (Adv. No. 24-50233), and the Voizzit Defendants' Indian complaint against the Trustee (Adv. No. 24-50280), two emergency motions to enforce the automatic stay with respect to the Debtors' Apple and Cloudflare accounts (D.I. 244; D.I. 340), and the pending contempt motion (Adv. No. 24-50233, D.I. 18). My counsel was also forced to separately negotiate consent orders providing for the turnover of the Debtors' Apple accounts (D. I. 230), Google accounts (D.I. 239), Cloudflare accounts (D.I. 311), and GoDaddy accounts (D.I. 328).

9. As it relates to these proceedings, on November 18, 2024, I authorized my counsel to file suit against Google, LLC, and the Voizzit Defendants, seeking among other relief, a temporary restraining order and preliminary and permanent injunction enjoining the Voizzit Defendants from continuing to exercise control over the Debtors' Google Workspace, Google Cloud, and Google Play Store accounts. I also sought relief against Google ordering it to return these accounts to the Debtors and my control.

10. The Voizzit Defendants theft of the Debtors' Google accounts was particularly problematic because these accounts host the Debtors' corporate records, emails, data, and software codes, including a code that directs the payments from the Debtors' websites and applications to various payment processors. Thus, by virtue of their control over the software code contained in the Debtors' Google Cloud accounts, the Voizzit Defendants would have had the ability to redirect payments made through the Debtors' websites to different payment processor accounts beyond the Trustee's reach (which I believe the Voizzit Defendants or certain of them in fact did).

11. On November 19, 2024, the Court entered its *Order Granting Chapter 11 Trustee's Motion For A Temporary Injunction* [Adv. D.I. 15] (the "TRO"), granting the relief I sought and

directing the Voizzit Defendants to take certain actions by November 22, 2024. Specifically, paragraph 3 of the TRO directed that:

On or before 5:00 p.m. E.T. on November 22, 2024, 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.

(TRO, ¶ 3.) Paragraph 5 of the TRO directed that:

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.

(TRO, ¶ 5.)

12. The Voizzit Defendants did not comply with the terms of the TRO.

13. On November 26, 2024, I directed my counsel to file the *Chapter 11 Trustee’s Emergency Motion for Contempt 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 (the “Contempt Motion”).]

14. On December 3, 2024, the Court held a hearing on both the Contempt Motion and the Trustee’s Motion for a Preliminary Injunction. The Court granted both motions. Like the TRO, the Court’s *Order Granting Chapter 11 Trustee’s Motion for Preliminary Injunction* directed the Voizzit Defendants to take certain actions in connection with the Debtors’ Google accounts. [Adv. D.I. 36 (the “PI”)] Specifically, paragraph 3 of the PI directed that:

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.

(PI, ¶ 3.) Paragraph 5 of the PI directed that:

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.

(PI, ¶ 5.)

15. On December 4, 2024, the Court also entered an *Order to Show Cause* why the Voizzit Defendants should not be held in contempt of the Court for their failure to comply with the TRO. [Adv. D.I. 39.] The show cause hearing is scheduled for January 22, 2024 at 10:00 a.m. The Voizzit Defendants were ordered to appear in person and the Court ruled that it would consider "all possible sanctions against the Voizzit Defendants, including imposition of a daily fine and/or placing Defendants Ravindra Vinay or Rajendran Vellapalath in civil confinement until they purge the Voizzit Defendants of such contempt." [*Id.*]

16. To date, the Voizzit Defendants have not complied with the terms of the TRO or the PI, and they continue to interfere with my efforts as Trustee to operate the Debtors' businesses so as to maximize value for creditors. Specifically, the Voizzit Defendants have violated both the TRO and PI in each of the following ways:

(a) *First*, the Voizzit Defendants have never provided me 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.” (TRO, ¶ 3; PI, ¶ 3.) The failure to provide this information was and continues to be problematic. At the outset, Google informed my counsel that, to quickly transfer the accounts back to the Debtors, the Voizzit Defendants would need to make these identifications for Google and then would need to cooperate in moving the accounts back to the Debtors’ control. A true and correct copy of an email which my counsel and I received on or about November 20, 2024 from Google’s counsel explaining this issue is attached hereto as Exhibit 1. The Voizzit Defendants’ failure to comply with this Court’s TRO and PI delayed the transfer of the accounts back to the Debtors’ estates by several days and caused increased expense on the part of my counsel and my financial advisors as they were forced to work through the issues with Google.

(b) *Second*, while Google ultimately was able to transfer the known accounts back to the Debtors and those accounts are now under my control, I have no way of knowing whether all accounts and associated projects were transferred back to the Trustee’s control. Based on the extensive efforts taken, I believe that we have recovered all of the accounts, but it is impossible to know if that is the case without the Voizzit Defendants confirming what they took from the Debtors. My concern about obtaining this list is amplified based on the extensive misconduct that has been uncovered in these bankruptcy cases; and on the fact that, on December 4 and 5, 2024, after I obtained access to and control over the Google accounts, I received emails from a legal@Voizzit.com address and signed by “Sai” advising that \$1,067,000 was owed to Google and, if not paid, Google would suspend the accounts. When I caused my counsel to ask Google if this was true, Google asked for the email address of the Google contact that threatened suspension of the account. In turn, on December 5, 2024, Jacob Grall posed that same question to legal@Voizzit.com. As of the

date of this declaration, Voizzit's Legal Department has not responded. A true and correct copy of an email chain between my counsel and Google's counsel on this issue and the original email from legal@voizzit.com is attached hereto as Exhibit 2. Assuming Voizzit's Legal Department's email to me was truthful (and not simply an attempt by the Voizzit Defendants to create confusion), it suggests that there is at least information available to, and potentially also accounts still linked to, the Voizzit Defendants related to the Debtors that have not been turned over.

(c) *Third*, Defendant Voizzit Information Technology LLC was twice ordered "to transfer all of the Debtors' applications, data, project, funds, or any other information or property of the Debtors" to the Trustee. (TRO, ¶ 5; PI, ¶ 5.) Voizzit Information Technology LLC did not do that. Once I obtained control over the Google accounts, I discovered that there was no data about account activity during the two months that those accounts were under the Voizzit Defendants' control, namely from on or around September 26, 2024 through November 26, 2024, the date on which I, as the Chapter 11 Trustee was able to obtain control over the Google accounts. Typically the accounts would have data showing the length of time a user accessed the platform and what content they viewed. This data informs, among other decisions, the calculation of amounts due to publishers on a quarterly basis. None of that usage data was in the accounts when I regained control of the accounts. When I asked Google for that data, Google's counsel advised that its customers manage their own data and that, while such data might have existed in the accounts at one time, Google could not reproduce the data if it was no longer in the account. A true and correct copy of an email exchange with Google's counsel about this issue is attached hereto as Exhibit 3. Now that I have control of the Google accounts, this data is available for the current operations of the account. It therefore appears that during the time



it took Google to transfer control over the accounts—a time period delayed by the Voizzit Defendants’ failure to comply with the TRO—the Voizzit Defendants stripped the accounts of data generated during the period they controlled the accounts. This will create issues for the estate in determining what amounts are owed to content creators for the use of their works during the third quarter of 2024.

(d) *Fourth*, the Voizzit Defendants told this Court at a prior hearing that they were actively maintaining the Debtors’ Google accounts while they were under the Voizzit Defendants’ control. This is not true. When I regained control over the Google accounts, the Chief Technical Officer for the Debtors discovered that the Voizzit Defendants had not maintained the accounts and instead had inserted code into the programs and taken other actions that harmed the programs. He was able to fix these issues, but this wrongful conduct has harmed the estate by diverting resources to fix a problem that never should have occurred in the first place.

(e) *Fifth*, the Voizzit Defendants have not accounted for any funds received while they were in control of the Debtors’ Google accounts in violation of both the TRO and the PI.<sup>2</sup>

(f) *Sixth*, as a result of the Voizzit Defendants interference with the Debtors’ Google accounts and the other wrongful actions they have taken, I have had to repeatedly negotiate with the Debtors’ secured creditors for extensions of the milestones contained in the loan agreements. My counsel has sought and obtained five extensions of the deadline to file the bidding procedures motion. I initially agreed to start the sale process on November 15, 2024 with sales closing by December 30, 2024 for the Epic assets and January 31, 2025,

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<sup>2</sup> As the Court knows with respect to the stay violations related to the Debtors’ accounts with Apple, the Voizzit Defendants still have not repaid the \$1,063,752 in funds they have wrongfully taken from the Debtors’ Apple accounts.

for the Tangible Play and Neuron Fuel assets. As a result of the Voizzit Defendants actions, instead of launching a sale process in November 2024, the sale process is now just starting and any sales will likely not close until April 2025.

(g) *Seventh and finally*, contrary to the TRO, which required the Voizzit Defendants to relinquish control over the Google accounts, the Voizzit Defendants did the exact opposite by filing suit on November 20, 2024, in India against the Trustee, Google India Pvt. Ltd., and other internet companies asking the Indian court to bar the Trustee from interfering with the Voizzit Defendants' access to, among other platforms, the Google accounts. This action was in direct violation of paragraph 4 of the TRO, which enjoined the Voizzit Defendants from "exercising ownership over . . . property of the Estates" and from "taking actions to impair in any way . . . property of the Estates...". By filing a lawsuit claiming ownership over the Debtors' property, including the Google accounts, the Voizzit Defendants have succeeded in creating confusion about who is entitled to operate the Debtors' businesses. This is occurring at the same time as the Trustee is engaged in a sales process for the Debtors, something that William Hailer during a hearing on November 21, 2024, that the Voizzit Defendants intended to do.<sup>3</sup> To remedy this violation of the TRO and PI, I filed a lawsuit seeking a temporary restraining order and preliminary injunction directing the Voizzit Defendants to dismiss the India lawsuit. This Court ordered the Voizzit Defendants to dismiss the Indian suit. Once those orders were entered, I directed my counsel in India to send the letter attached hereto as Exhibit 4 to the Voizzit Defendants'

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<sup>3</sup> Specifically, Mr. Hailer testified that he was told by Byju Ravindran that Voizzit "would continue to muddle the water of the overall bankruptcy hearings and their rightful ownership of the assets" by filing a court action, which he thought would occur in Delaware. [D.I. 338 (11/21/24 Tr.) at 44.] He also testified that Mr. Ravindran's goal was to "decrease the value of the assets where the trustee would have a harder time selling the assets. That it would be more likely that the lenders would either agree to sell term loan B to [an entity acting for Mr. Ravindran] or agree to a lower price for the assets." [*Id.*] And he testified that he met Voizzit Defendant Vellapalath through Mr. Ravindran. [*Id.* at 45, 59.]

counsel in India, asking that their clients withdraw the lawsuit. To date, the Voizzit Defendants have not withdrawn their lawsuit. As a result, my counsel in India has and will continue to incur additional fees enforcing this Court's orders in India.

17. Additionally, the estate has incurred substantial legal and other professional fees as a result of the Voizzit Defendants' failure to comply with the TRO and PI, as set forth in the statements attached as Group Exhibit 5 and summarized below:

Jenner & Block LLP	\$91,731.50
Novo Advisors	\$30,975.00
Law Offices of Panag & Babu	\$42,980.00
Pashman Stein Walder Hayden, P.C.	\$32,949.50
<b>TOTAL:</b>	<b>\$198,636.00</b>

In addition, my counsel will incur additional fees attending the contempt hearing.

18. For all of these reasons, I am asking the Court to hold the Voizzit Defendants in civil contempt and to award the following relief to compel compliance with its TRO (the obligations of which were also memorialized in the Court's PI) and to compensate the estate for the damages caused by the Voizzit Defendants failure to comply with this Court's Orders:

(a) A daily fine in an amount determined by the Court to be appropriate and an order of confinement against the individual Defendants to remain in place until the Voizzit Defendants, at a minimum, fully comply with paragraphs 3 and 5 of the TRO, including specifically (i) providing the information required by paragraph 3 of the TRO, (ii) producing the data they stripped from the Debtors' accounts while they were in control of those accounts, and (iii) accounting for and returning any funds received while they were in control of the Debtors' Google accounts. Furthermore, the Court should (iv) require the Voizzit Defendants, as a further condition of their compliance, to dismiss their Indian lawsuit.

(b) Damages equal to the legal and other professional fees incurred in enforcing the TRO.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 17, 2024

/s/ Claudia Z. Springer  
Claudia Z. Springer

# **Exhibit 1**

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**From:** Vandermark, James <Vandermarkj@whiteandwilliams.com>  
**Sent:** Wednesday, November 20, 2024 8:18 PM  
**To:** Root, Melissa M. <MRoot@Jenner.com>; Claudia Springer <cSpringer@novo-advisors.com>  
**Cc:** Steege, Catherine L. <CSteege@jenner.com>; Jacob Grall <jgrall@novo-advisors.com>; Williams, William A. <WWilliams@jenner.com>; Epic <epic@pashmanstein.com>; Sorvino, Heidi <Sorvinoh@whiteandwilliams.com>; Ingrassia, Michael <Ingrassiam@whiteandwilliams.com>; Claudia Springer <cSpringer@novo-advisors.com>  
**Subject:** RE: TRO Order [WWLLP-PHLDMS1.FID2170719]

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Melissa,

Google understands and will comply with the TRO, but we are recommending that Voizzit complete the transfer of the project at issue. We do not know the time it will take for Google to complete a full transfer of the project to the Trustee – it could be days or it could be weeks. We also cannot confirm the project will be operating during that time. I will let you know if Google is able to provide an estimate on either of the foregoing. That said, please confirm you want Google to move forward with beginning the process for the transfer of the project.

Best,

-James



**James C. Vandermark** | Pronouns: “he” and “him”  
810 Seventh Avenue | Suite 500 | New York, NY 10019  
1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857  
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**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Sent:** Wednesday, November 20, 2024 5:10 PM  
**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Cc:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>; Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** Re: TRO Order [WWLLP-PHLDMS1.FID2170719]

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James, please provide a response.

As you know, this is an urgent and time sensitive issue for the Trustee, so if Google is not willing to comply with the TRO we will need to involve the Court.

The TRO does not allow Google to pick and choose which accounts it gives the Trustee access to, nor does it allow for Google to do nothing and redirect to Voizzit. If you disagree, please re-read the TRO Order, and in particular paragraph 2, and let me know the bases for Google's position that "the Cloud project should be addressed for Voizzit."

The Trustee reserves all rights with respect to the harm to estate caused by Google, including seeking per diem damages for Google's failure to comply with the terms of the TRO Order.

Melissa

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**From:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Date:** Wednesday, November 20, 2024 at 3:28 PM  
**To:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Cc:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>, Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>, Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>, Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>, Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>, Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>, Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>, Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** Re: TRO Order [WWLLP-PHLDMS1.FID2170719]

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Agree. We are not going to rely upon the thief to do the right thing. That's a lost cause and is a waste of time. This needs Google's attention.  
Sent from my iPhone

On Nov 20, 2024, at 3:24 PM, Root, Melissa M. <[MRoot@jenner.com](mailto:MRoot@jenner.com)> wrote:

The Cloud issue needs to be addressed by Google. The TRO order does not allow Google to sit and wait for Voizzit., known bad actors. If we need to go in on an emergency motion

to compel Google's compliance we will. Please let us know when you are available for a call today.

---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>  
**Sent:** Wednesday, November 20, 2024 3:06 PM  
**To:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Cc:** Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>  
**Subject:** RE: TRO Order [WWLLP-PHLDMS1.FID2170719]

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Melissa,

All Workspace and Play accounts identified using the information in the TRO will be provided to the Trustee. The Cloud project for Epic should be addressed by Voizzit, which will be much faster than if Google had to move the project. If there are other Cloud projects that you believe are owned by the Debtors, please provide the associated project IDs.

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"  
810 Seventh Avenue | Suite 500 | New York, NY 10019  
1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857  
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**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Sent:** Wednesday, November 20, 2024 2:20 PM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>  
**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>;



Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Subject:** Re: TRO Order [WWLLP-PHLDMS1.FID2170719]

**CAUTION:** This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

Also, please confirm Google is also working on providing access to the Google Cloud account for Epic and the Cloud, Workspace, and Play accounts for Tangible Play and Neuron Fuel. Again, I think a call would be helpful so we are not emailing past one another, so hopefully we can find time this afternoon.

---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>

**Date:** Wednesday, November 20, 2024 at 1:01 PM

**To:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>, Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>, Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>, Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>, Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>, Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>, Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Subject:** RE: TRO Order [WWLLP-PHLDMS1.FID2170719]

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Melissa,

We provided Google with the TRO and requested they provide instructions for providing the admin accounts for the identified Workspace and Play Store accounts. I anticipate it will be similar to the Workspace account for Epic and will update you as soon as we have additional information.

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"

810 Seventh Avenue | Suite 500 | New York, NY 10019

1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103

New York: 646.837.5791 | Philadelphia: 215.864.6857

[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Sent:** Wednesday, November 20, 2024 1:00 PM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>  
**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** Re: TRO Order

**CAUTION:** This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

James, following up on the below request for a meeting and the status of Google's compliance with the Order. Thank you.

---

**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Sent:** Tuesday, November 19, 2024 4:21:06 PM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Sorvino, Heidi <[Sorvinoh@whiteandwilliams.com](mailto:Sorvinoh@whiteandwilliams.com)>; Samis, Christopher M. <[csamis@potteranderson.com](mailto:csamis@potteranderson.com)>  
**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** TRO Order

Please see the attached Order, just entered by the Court. Google and Potter Anderson teams, please confirm your clients are taking the actions required by the Order. James, I suggest we set up a meeting ASAP with the right business person at Google and Jacob Grall to discuss next steps. Please provide availability.

Melissa

---

## Melissa M. Root

**Jenner & Block LLP**  
353 N. Clark Street  
Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)  
+1 312 840 7255 | Tel  
+1 312 259 7967 | Mobile  
Pronouns : She / Her  
[MRoot@Jenner.com](mailto:MRoot@Jenner.com)  
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---

# **Exhibit 2**

---

**From:** Vandermark, James <Vandermarkj@whiteandwilliams.com>  
**Sent:** Friday, December 6, 2024 9:07 AM  
**To:** Claudia Springer <cSpringer@novo-advisors.com>; Root, Melissa M. <MRoot@Jenner.com>  
**Cc:** Jacob Grall <jgrall@novo-advisors.com>; Steege, Catherine L. <CSteege@jenner.com>; Ingrassia, Michael <Ingrassiam@whiteandwilliams.com>  
**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

**External Email - Do Not Click Links or Attachments Unless You Know They Are Safe**

Claudia,

Google advised there are pre- and post-petition balances for all Debtors; however, there are no current suspension warnings for the Epic payment profile. We have requested an account summary and will provide you with the same. Even though a suspension is not currently pending, we would still ask that Voizzit provide the email address for their contact at Google. Thank you.

Best,

-James



James C. Vandermark | Pronouns: "he" and "him"  
810 Seventh Avenue | Suite 500 | New York, NY 10019  
1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857  
[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Sent:** Thursday, December 5, 2024 12:52 PM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

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Jacob just asked for that. Hopefully they will respond.

**Claudia Z. Springer** | Principal

(215) 896-3775 | [cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

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---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>

**Sent:** Thursday, December 5, 2024 12:50 PM

**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

Hi Claudia,

I may have misread the emails and see now that Sai may be an individual with Voizzit. Their email references a point of contact at Google. I am trying to identify that individual. It would be helpful if Voizzit would provide the email address for the referenced Google contact.

-James



**James C. Vandermark** | Pronouns: "he" and "him"

810 Seventh Avenue | Suite 500 | New York, NY 10019

1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103

New York: 646.837.5791 | Philadelphia: 215.864.6857

[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Sent:** Thursday, December 5, 2024 12:35 PM

**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

**CAUTION:** This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

I received the email from Legal Voizzit. Email address is [legal@voizzit.com](mailto:legal@voizzit.com).

**Claudia Z. Springer** | Principal

(215) 896-3775 | [cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

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**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>

**Sent:** Thursday, December 5, 2024 12:32 PM

**To:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

Melissa,

We advised Google of the below correspondence and asked them to confirm that no suspension is currently pending for Epic. Based on the email forwarded, it appears that the sender is named "Sai"; however, there is no indication whether they are actually with Google. If they are with Google, there is no indication what group or internal team is involved with this matter. It would be helpful to confirm this information. Would the Trustee be able to obtain the email address of the sender from Voizzit?

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"

810 Seventh Avenue | Suite 500 | New York, NY 10019

1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103

New York: 646.837.5791 | Philadelphia: 215.864.6857

[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Sent:** Thursday, December 5, 2024 11:23 AM

**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Cc:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>

**Subject:** FW: Urgent - All accounts will likely get suspended soon

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James, we received the attached invoices from "legal@voizzit" along with a message that Google will suspend access if the invoices are not paid today. Obviously, the Voizzit entities are not credible, but can you please confirm (1) that Google has no plans to suspend or disrupt any services to the Debtors, which would violate the stay; and (2) confirm whether the attached invoices are legitimate Google invoices for services provided to the estates?

Thank you,

Melissa

---

### Melissa M. Root

**Jenner & Block LLP**

353 N. Clark Street  
Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)

+1 312 840 7255 | Tel  
+1 312 259 7967 | Mobile

Pronouns : She / Her

[MRoot@jenner.com](mailto:MRoot@jenner.com)

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---

**From:** Legal Voizzit <[legal@voizzit.com](mailto:legal@voizzit.com)>

**Date:** December 5, 2024 at 9:57:06 AM EST

**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>

**Subject:** Re: Urgent - All accounts will likely get suspended soon

Hi,

Please find the invoices attached for your reference, as received from our point of contact. As per Google, if the payments are not completed today, Google services will be disrupted. Restoring them may take some time.

Please prioritize this payment to avoid any interruptions.

Thank you

On Thu, Dec 5, 2024 at 2:45 PM Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)> wrote:

Where are the invoices?

Sent from my iPhone

> On Dec 4, 2024, at 10:32 PM, Legal Voizzit <[legal@voizzit.com](mailto:legal@voizzit.com)> wrote:

>

>

> Hi,

>

> Following are the urgent messages we received from our point of contact in Google.

> “ Please note that for the services provided by Google (Cloud and other services), the current outstanding for Epic is \$617k and the amount for Oct and Nov is about \$450k.

>

> Please note that unless these dues are cleared at the earliest, the Google accounts are likely to be suspended.

>

> Kindly make the payment urgently and share the details to avoid this suspension.

>

> Please treat this as CRITICAL. All accounts will likely get suspended soon unless the payment is made.”

>

> We are informing this in good faith because we don't want millions of students to suffer

.

>

> Regards,

> Sai



# **Exhibit 3**

---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>  
**Sent:** Monday, December 9, 2024 12:34 PM  
**To:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>  
**Cc:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>;  
Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael  
<[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Birch, Morgan <[Birchm@whiteandwilliams.com](mailto:Birchm@whiteandwilliams.com)>  
**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

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Jacob,

Google confirmed that the entire project was transferred along with any existing data. Customers are responsible for managing data and Google does not review customer data. While the data you are seeking may have existed at one time, Google would not be able to confirm whether that data was ever stored in the Cloud project.

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"  
810 Seventh Avenue | Suite 500 | New York, NY 10019

1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857

[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>

**Sent:** Friday, December 6, 2024 1:06 PM

**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

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Hi James,

We recently found that we have no data available during the time that the Epic Project (epic-jenkins) was in the Voizzit account. This data includes user statistics and content statistics (number of reads per book title, for example), to name a few.

Could you advise if this data exists in the Voizzit account?

**Jacob Grall**

(630) 408-2183 | [jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)

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---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>

**Sent:** Friday, December 6, 2024 10:07 AM

**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

Claudia,

Google advised there are pre- and post-petition balances for all Debtors; however, there are no current suspension warnings for the Epic payment profile. We have requested an account summary and will provide you with the same. Even though a suspension is not currently pending, we would still ask that Voizzit provide the email address for their contact at Google. Thank you.

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"  
810 Seventh Avenue | Suite 500 | New York, NY 10019  
1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857  
[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Sent:** Thursday, December 5, 2024 12:52 PM

**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

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Jacob just asked for that. Hopefully they will respond.

**Claudia Z. Springer** | Principal

(215) 896-3775 | [cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

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**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>  
**Sent:** Thursday, December 5, 2024 12:50 PM  
**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>  
**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

Hi Claudia,

I may have misread the emails and see now that Sai may be an individual with Voizzit. Their email references a point of contact at Google. I am trying to identify that individual. It would be helpful if Voizzit would provide the email address for the referenced Google contact.

-James



**James C. Vandermark** | Pronouns: "he" and "him"  
810 Seventh Avenue | Suite 500 | New York, NY 10019  
1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103  
New York: 646.837.5791 | Philadelphia: 215.864.6857  
[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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**From:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Sent:** Thursday, December 5, 2024 12:35 PM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>; Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

**CAUTION:** This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

I received the email from Legal Voizzit. Email address is [legal@voizzit.com](mailto:legal@voizzit.com).

**Claudia Z. Springer** | Principal

(215) 896-3775 | [cspringer@novo-advisors.com](mailto:cspringer@novo-advisors.com)

**NOVO ADVISORS**

[www.novo-advisors.com](http://www.novo-advisors.com)

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---

**From:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>

**Sent:** Thursday, December 5, 2024 12:32 PM

**To:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>

**Cc:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>;  
Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Ingrassia, Michael  
<[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>

**Subject:** RE: Urgent - All accounts will likely get suspended soon [WWLLP-PHLDMS1.FID2418278]

Melissa,

We advised Google of the below correspondence and asked them to confirm that no suspension is currently pending for Epic. Based on the email forwarded, it appears that the sender is named "Sai"; however, there is no indication whether they are actually with Google. If they are with Google, there is no indication what group or internal team is involved with this matter. It would be helpful to confirm this information. Would the Trustee be able to obtain the email address of the sender from Voizzit?

Best,

-James



**James C. Vandermark** | Pronouns: "he" and "him"

810 Seventh Avenue | Suite 500 | New York, NY 10019

1650 Market Street | One Liberty Place, Suite 1800 | Philadelphia, PA 19103

New York: 646.837.5791 | Philadelphia: 215.864.6857

[vandermarkj@whiteandwilliams.com](mailto:vandermarkj@whiteandwilliams.com) | [whiteandwilliams.com](http://whiteandwilliams.com)

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---

**From:** Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>  
**Sent:** Thursday, December 5, 2024 11:23 AM  
**To:** Vandermark, James <[Vandermarkj@whiteandwilliams.com](mailto:Vandermarkj@whiteandwilliams.com)>; Ingrassia, Michael <[Ingrassiam@whiteandwilliams.com](mailto:Ingrassiam@whiteandwilliams.com)>  
**Cc:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>; Jacob Grall ([jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)) <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>; Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>  
**Subject:** FW: Urgent - All accounts will likely get suspended soon

**CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.**

James, we received the attached invoices from "legal@voizzit" along with a message that Google will suspend access if the invoices are not paid today. Obviously, the Voizzit entities are not credible, but can you please confirm (1) that Google has no plans to suspend or disrupt any services to the Debtors, which would violate the stay; and (2) confirm whether the attached invoices are legitimate Google invoices for services provided to the estates?

Thank you,

Melissa

---

## Melissa M. Root

**Jenner & Block LLP**  
353 N. Clark Street  
Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)  
[+1 312 840 7255](tel:+13128407255) | Tel  
[+1 312 259 7967](tel:+13122597967) | Mobile  
Pronouns : She / Her  
[MRoot@Jenner.com](mailto:MRoot@Jenner.com)  
[Download V-Card](#) | [View Biography](#)

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---

**From:** Legal Voizzit <[legal@voizzit.com](mailto:legal@voizzit.com)>  
**Date:** December 5, 2024 at 9:57:06 AM EST  
**To:** Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)>  
**Cc:** Jacob Grall <[jgrall@novo-advisors.com](mailto:jgrall@novo-advisors.com)>  
**Subject: Re: Urgent - All accounts will likely get suspended soon**

Hi,

Please find the invoices attached for your reference, as received from our point of contact. As per Google, if the payments are not completed today, Google services

will be disrupted. Restoring them may take some time.

Please prioritize this payment to avoid any interruptions.

Thank you

On Thu, Dec 5, 2024 at 2:45 PM Claudia Springer <[cSpringer@novo-advisors.com](mailto:cSpringer@novo-advisors.com)> wrote:

Where are the invoices?

Sent from my iPhone

> On Dec 4, 2024, at 10:32 PM, Legal Voizzit <[legal@voizzit.com](mailto:legal@voizzit.com)> wrote:

>

>

> Hi,

>

> Following are the urgent messages we received from our point of contact in Google.

> “ Please note that for the services provided by Google (Cloud and other services), the current outstanding for Epic is \$617k and the amount for Oct and Nov is about \$450k.

>

> Please note that unless these dues are cleared at the earliest, the Google accounts are likely to be suspended.

>

> Kindly make the payment urgently and share the details to avoid this suspension.

>

> Please treat this as CRITICAL. All accounts will likely get suspended soon unless the payment is made.”

>

> We are informing this in good faith because we don't want millions of students to suffer .

>

> Regards,

> Sai



# **Exhibit 4**

**From:** Saloni Jain <saloni.jain@pblawoffices.com>  
**Sent:** Friday, January 10, 2025 3:18 AM  
**To:** sreekumarchelur@gmail.com; sarvamlegal@gmail.com  
**Cc:** Samudra Sarangi; CDIA Project Aquila  
**Subject:** Voizzit Technology Private Limited v. Think & Learn Private Limited & Ors (Commercial Suit No. 118 of 2024) | Withdrawal of Suit and request for service of all supporting documents  
**Attachments:** Voizzit TRO - 11.12.24.pdf; Voizzit Preliminary Injunction Order - 18.12.24.pdf

**WITHOUT PREJUDICE**

Mr Chellur

**Subject:** Withdrawal of subject commercial suit and request for service of all supporting documents.

**Re:** Before the Hon'ble Commercial Court, Ernakulam  
Commercial Suit No. 118 of 2024  
Voizzit Technology Private Limited v. Think & Learn Private Limited & Ors.

The present communication is being issued on behalf and under instructions of our client – Defendant No. 2 in the captioned Commercial Suit.

I am taking the liberty of attaching two orders passed by the United States Bankruptcy Court for the District of Delaware (**Delaware Court**):

1. Temporary Restraining Order dated 11 December 2024 against the Plaintiff restraining it from continuing to prosecute the above-referred Commercial Suit.
2. Order of Preliminary Injunction dated 18 December 2024 whereby the filing of the captioned Commercial Suit has been found to be violate the automatic stay in effect and that within 7 (seven) days of the said order, the Plaintiff (and related parties) were directed to take all necessary steps to withdraw or dismiss the said Commercial Suit.

I am addressing this email to enquire if the Plaintiff intends on complying with the attached orders of the Delaware Court and take steps to withdraw the said Commercial Suit, or in the alternative proceed to prosecute the said matter in contempt of the orders of the Delaware Court? In the event you do not immediately dismiss this Suit as required by the Court orders, my client reserves all of her rights to seek appropriate sanctions.

Notwithstanding the attached orders of the Delaware Court, and without prejudice to my client's rights to seek sanctions, if the Plaintiff intends to continue prosecuting the said Commercial Suit, as ill-advised as that maybe, we would at least request you to immediately serve us with a complete paper book of the all filings made along with the Commercial Suit and specifically the supporting documents filed along with the Commercial Suit.

As you are aware, the next date of hearing in the matter is scheduled on 18 January 2024. Accordingly, we would request you to appropriately respond to this email on priority.

Thanking you.

Yours sincerely  
Saloni Jain

Advocate for Defendant No. 2 – Claudia Z Spinger, Esq. (in her capacity as a Chapter 11 Trustee)

--

**Saloni Jain | Senior Associate**

**Law Offices of Panag & Babu**

New Delhi | Bengaluru

**New Delhi**

No. 82

Okhla Industrial Estate - III

New Delhi 110020

Mobile: +91-9716840688

Telephone: +91-11-49996800



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

<p>In re:</p> <p>EPIC! CREATIONS, INC., <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 24-11161 (JTD)</p> <p>(Jointly Administered)</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24-50280 (JTD)</p> <p>(Jointly Administered)</p>

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION FOR  
ENTRY OF TEMPORARY RESTRAINING ORDER**

Upon consideration of the *Chapter 11 Trustee’s Motion for Entry of Temporary Restraining Order* (the “**Motion**”)<sup>2</sup> 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 its supporting papers; and the Court having held a hearing on

<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 *Chapter 11 Trustee’s Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*.

December 11, 2024 (the “**Hearing**”); and the Court having considered all evidence and arguments presented at the Hearing; 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, 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.

For the reasons stated on the record at the Hearing, it is hereby DECLARED and ORDERED THAT:

1. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), 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.

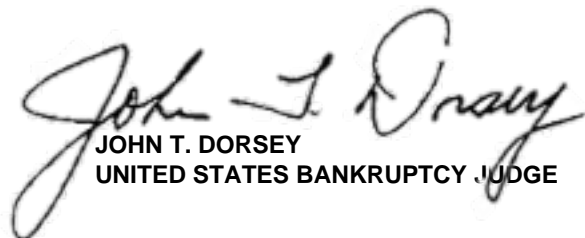
2. Until further order from the Court, and pending a final hearing on the Trustee's request for a preliminary injunction, the website domains [www.getepic.com](http://www.getepic.com) and [www.playosmo.com](http://www.playosmo.com) and all ancillary websites and applications are the property of the Debtors' estates and within the exclusive jurisdiction of this Court. Any actions taken in respect thereof must be with the Trustee and/or this Court's consent.

3. The Court shall hold a hearing on December 19, 2024, at 1:00 p.m. (Eastern Time) to consider the entry of a preliminary injunction in connection with the Motion (the "**PI Hearing**"). Objections to the Motion shall be filed and served no later than three (3) business days prior to the PI Hearing. Replies may be filed by 4:00 p.m. (Eastern Time) one (1) business day prior to the PI Hearing.

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 10:18 a.m. (Eastern Time), December 11, 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.

Dated: December 11th, 2024  
Wilmington, Delaware

  
JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

**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.

Adv. Pro. No. 24-50280 (JTD)

(Jointly Administered)

Voizzit Technology Private Ltd.,  
Voizzit Information Technology LLC,  
Think and Learn Pvt Ltd, and  
Rajendran Vellapalath,

Defendants.

**Re. Adv. D.I. 2, 3, 12**

## **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")<sup>2</sup> 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

<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 *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.

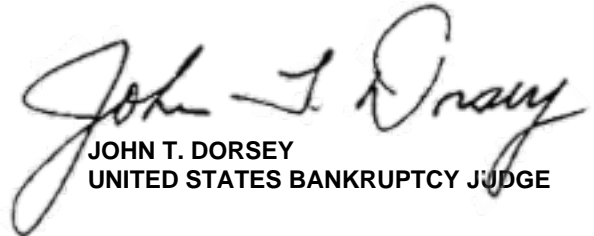
2. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(a), as made applicable herein by Bankruptcy Rule 7065, each Defendant, and all persons acting in concert or participation with any Defendant, are enjoined from taking any act to continue prosecuting or otherwise 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](http://www.getepic.com) and [www.playosmo.com](http://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.

Dated: December 18th, 2024  
Wilmington, Delaware



JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

# **Group Exhibit 5**

**JENNER & BLOCK'S FEES**

11/22/24	MMR	.80	Worked on contempt motion (Google).	1,236.00
11/24/24	MMR	.50	Work on contempt papers (Google).	772.50
11/25/24	CS	6.50	Revised and edited contempt motion re Apple stay order violation related to Cloudflare stay violaiton.	14,982.50
11/25/24	CS	1.00	Revised Google contempt motion.	2,305.00
11/25/24	MMR	2.10	Draft and circulate contempt papers (1.5); confer with C. Steege re same (.2); work on orders (.4).	3,244.50
11/25/24	MMR	.80	Follow up work on contempt motions (Google).	1,236.00
11/26/24	CS	2.30	Revised Google TRO contempt motion (2.0) and order (.3).	5,301.50
11/26/24	MMR	1.10	Revise contempt motions, orders, J. Grall declaration (Google).	1,699.50
11/26/24	MMR	2.30	Multiple conferences with C. Steege re contempt motions and revisions to same (Google).	3,553.50
12/09/24	CS	.80	Telephone conference with Pashman team re Voizzit stay violation related to filing of Indian complaint.	1,844.00
12/09/24	CS	.40	Reviewed Indian complaint.	922.00
12/09/24	CS	.40	Emails to team and Indian counsel re Indian Voizzit complaint.	922.00
12/09/24	CS	.40	Telephone conference with team re organization of latest TRO.	922.00
12/09/24	CS	3.50	Edited complaint vs. Voizzit related to filing of Indian complaint.	8,067.50
12/09/24	CS	.70	Edited TRO moving papers related to filing of Indian complaint.	1,613.50
12/09/24	MMR	.70	Meeting with Delaware counsel re case strategy and Voizzit issue related to filing of Indian complaint.	1,081.50
12/09/24	MMR	3.00	Work on new complaint, TRO, motion, memo related to filing of Indian complaint (2.3); multiple conferences with team re filing of Indian complaint (.7).	4,635.00
12/09/24	MMR	1.10	Review of papers received from Apple re India complaint and diligence on filing (.9); email to India counsel with proposed complaint/TRO (.2).	1,699.50
12/09/24	WAW	4.60	Prepared TRO motion related to filing of Indian complaint and supporting brief and declaration re India lawsuit.	6,302.00

12/09/24	WAW	1.30	Researched additional case law for inclusion in TRO brief related to filing of Indian complaint.	1,781.00
12/09/24	WAW	.50	Reviewed and revised draft complaint re India lawsuit.	685.00
12/09/24	WAW	.70	Multiple email correspondence with Jenner team re complaint and TRO materials re India lawsuit.	959.00
12/09/24	BSB	1.60	Researched caselaw re enjoining parallel foreign litigation.	1,536.00
12/10/24	CS	2.50	Reviewed and revised latest TRO and complaint regarding India complaint filing.	5,762.50
12/10/24	CS	2.00	Prepared argument for India hearing.	4,610.00
12/10/24	MMR	2.10	Finalize new adversary complaint, memo, motion, and TRO related to filing of Indian complaint for filing.	3,244.50
12/10/24	MMR	.20	Edits to outline for 12/11 hearing related to filing of Indian complaint and stay violation re same.	309.00
12/10/24	WAW	2.10	Reviewed and finalized draft complaint and TRO materials related to filing of Indian complaint.	2,877.00
12/10/24	WAW	.60	Multiple email correspondence with Jenner, Pashman, and Novo teams re complaint and TRO materials related to filing of Indian complaint.	822.00
12/11/24	CS	.50	Prepared for stay hearing re filing of India complaint.	1,152.50
12/11/24	CS	.40	Attended hearing re stay violation re India complaint.	922.00
12/11/24	CS	.20	Revised TRO related to filing of Indian complaint to conform with Court's comments.	461.00
12/11/24	MMR	.50	Participate in TRO hearing related to filing of Indian complaint.	772.50
1/06/25	CS	3.00	Prepared for contempt hearing.	7,035.00
1/07/25	CS	4.00	Prepared C. Springer declaration.	9,380.00
1/07/25	CS	.50	Met with K&E team re 1/13/25 hearing preparation.	1,172.50
1/07/25	MMR	1.60	Prepare for contempt hearing, multiple conferences with C. Steege re same.	2,520.00
1/07/25	MMR	.50	Meeting with K&E re prep for contempt hearing.	787.50
1/07/25	MMR	.80	Review and comment on Springer declaration and identify exhibits.	1,260.00

1/08/25	CS	1.00	Revised Springer declaration for contempt hearing.	2,345.00
1/08/25	MMR	1.30	Prep for contempt hearing, including review of transcript from Byju case (1.0); confer with C. Steege re same (.3).	2,047.50
		60.90	PROFESSIONAL SERVICES	114,781.50

**SUMMARY OF LITIGATION TO SECURE ASSETS**

<b>NAME</b>	<b>HOURS</b>	<b>RATE</b>	<b>TOTAL</b>
CATHERINE L. STEEGE	8.50	2,345.00	19,932.50
CATHERINE L. STEEGE	21.60	2,305.00	49,788.00
MELISSA M. ROOT	4.20	1,575.00	6,615.00
MELISSA M. ROOT	15.20	1,545.00	23,484.00
WILLIAM A. WILLIAMS	9.80	1,370.00	13,426.00
BRIAN S. BORNHOFT	1.60	960.00	1,536.00
TOTAL	60.90		114,781.50

**NOVO ADVISORS FEES**



**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

Jointly Administered

Date	Name	Hours	Bill Rate	Amount	Task	Description
10/10/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with R. Shankar (KE), J. Elkin (KE), Trustee and S. Gupta (Novo) to discuss support to contact key personnel at Google, Apple and other tech platforms to secure cash and IP. [Meetings of and Communications with Case Professionals]
10/14/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	2	Call with J. Ransom (Epic) to discuss next steps with Google accounts [Business Operations]
10/14/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with M. Root (Jenner) and J. Vandermark, counsel for Google, regarding case and account access [Meetings of and Communications with Case Professionals]
10/14/2024	J. Grall	0.1	\$ 750.00	\$ 75.00	15	Call with M. Root (Jenner) to discuss Google call [Meetings of and Communications with Case Professionals]
10/14/2024	J. Grall	0.3	\$ 750.00	\$ 225.00	15	Call with S. Gupta (Novo) to discuss Google call [Meetings of and Communications with Case Professionals]
10/15/2024	J. Grall	0.2	\$ 750.00	\$ 150.00	15	Call with M. Root (Jenner) and S. Pillay (Jenner) to discuss Google matter [Meetings of and Communications with Case Professionals]
10/15/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with J. Vandermark (Google counsel), M. Root (Jenner), S. Pillay (Jenner) regarding Google account matter [Meetings of and Communications with Case Professionals]
10/16/2024	J. Grall	0.7	\$ 750.00	\$ 525.00	1	Correspondence regarding Google matter [Case Administration]
10/16/2024	J. Grall	1.2	\$ 750.00	\$ 900.00	2	Calls with IT vendor regarding Google matter [Business Operations]
10/16/2024	J. Grall	0.7	\$ 750.00	\$ 525.00	7	Debrief discussions with J. Grall regarding DIP term sheet and continued efforts to gain access to Google. [Support for Orders and Filings]
10/17/2024	J. Grall	0.6	\$ 750.00	\$ 450.00	7	Reviewed Stripe and Google orders [Support for Orders and Filings]
10/18/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Epic IT provider regarding Google accounts [Business Operations]
10/18/2024	J. Grall	0.6	\$ 750.00	\$ 450.00	1	Calls with S. Gupta (Novo) to discuss management of gaining access to Google platforms. [Case Administration]
10/19/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Trustee and Epic employee regarding Google and other operational matters [Business Operations]
10/21/2024	J. Grall	0.3	\$ 750.00	\$ 225.00	2	Call with Epic IT vendor regarding status of Google accounts [Business Operations]
10/21/2024	J. Grall	0.1	\$ 750.00	\$ 75.00	2	Call with employee regarding Google matter [Business Operations]
10/21/2024	J. Grall	0.3	\$ 750.00	\$ 225.00	15	Call with W. Williams (Jenner) regarding Google matter [Meetings of and Communications with Case Professionals]
10/22/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with M. Root (Jenner), W. Williams (Jenner) and Google counsel [Meetings of and Communications with Case Professionals]

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

Jointly Administered

Date	Name	Hours	Bill Rate	Amount	Task	Description
10/24/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with M. Root (Jenner) and counsel for Google regarding Epic order and status of Tangible Play [Meetings of and Communications with Case Professionals]
10/30/2024	J. Grall	0.4	\$ 750.00	\$ 300.00	2	Call with Epic employee regarding Google status [Business Operations]
10/30/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	7	Reviewed redlines to Google order [Support for Orders and Filings]
11/6/2024	J.Grall	2.0	\$ 750.00	\$ 1,500.00	2	Provisioned Google Workspaces account and reviewed admin sites [Business Operations]
11/7/2024	J.Grall	0.4	\$ 750.00	\$ 300.00	2	Established admin access in Google Workspaces [Business Operations]
11/7/2024	J.Grall	1.0	\$ 750.00	\$ 750.00	2	Reviewed user logs and accounts registered in Google Workspaces [Business Operations]
11/7/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Epic employee regarding Google access [Business Operations]
11/7/2024	J.Grall	2.5	\$ 750.00	\$ 1,875.00	2	Deactivated Google access for 563 account holders in Epic account [Business Operations]
11/7/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Epic vendor regarding Google access [Business Operations]
11/7/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	2	Call with Epic employee to review Google admin pages [Business Operations]
11/7/2024	J.Grall	1.1	\$ 750.00	\$ 825.00	2	Reestablished Google access for active Epic employees [Business Operations]
11/7/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with Trustee to discuss Google matter [Meetings of and Communications with Case Professionals]
11/7/2024	J.Grall	2.2	\$ 750.00	\$ 1,650.00	2	Reviewed access logs and account activity for suspicious involvement in Google accounts [Business Operations]
11/8/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with Trustee, Jenner team, and S. Gupta (Novo) to discuss Google stipulation [Meetings of and Communications with Case Professionals]
11/14/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with W. Williams (Jenner) regarding Google accounts and email discovery [Meetings of and Communications with Case Professionals]
11/14/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	2	Review of emails gathered in Google account discovery [Business Operations]
11/15/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with W. Williams (Jenner) and L. Pelanek (Jenner) to review Google admin account [Meetings of and Communications with Case Professionals]
11/15/2024	J.Grall	0.3	\$ 750.00	\$ 225.00	2	Activation of various support accounts for Epic employees on Google [Business Operations]
11/18/2024	J.Grall	0.3	\$ 750.00	\$ 225.00	15	Call with J. Vandermark (White and Williams), H. Sorvino (White and Williams), M. Root (Jenner), Trustee to discuss Google matter [Meetings of and Communications with Case Professionals]
11/18/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	15	Weekly status call with Trustee and Jenner, Pashman, Novo teams to discuss weekly filing deadlines, sanctions hearing, and Google matter [Meetings of and Communications with Case Professionals]

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

Jointly Administered

Date	Name	Hours	Bill Rate	Amount	Task	Description
11/18/2024	J.Grall	0.4	\$ 750.00	\$ 300.00	2	Call with Epic employee regarding Google and Tangible Play outage [Business Operations]
11/18/2024	J.Grall	0.3	\$ 750.00	\$ 225.00	15	Call with J. Vandermark (White and Williams), M. Root (Jenner), and Trustee regarding Google matter and complaint [Meetings of and Communications with Case Professionals]
11/18/2024	J.Grall	0.3	\$ 750.00	\$ 225.00	15	Call with Trustee to recap Google matter and discuss issues [Meetings of and Communications with Case Professionals]
11/18/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with Trustee, M. Root (Jenner), and C. Steege (Jenner) to discuss Google Complaint and TRO [Meetings of and Communications with Case Professionals]
11/18/2024	J.Grall	0.6	\$ 750.00	\$ 450.00	7	Review of Google complaint and provided commentary [Support for Orders and Filings]
11/18/2024	J.Grall	0.1	\$ 750.00	\$ 75.00	15	Call with C. Steege (Jenner) regarding declaration on Google matter [Meetings of and Communications with Case Professionals]
11/18/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	7	Review of updated Google complaint and TRO [Support for Orders and Filings]
11/19/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	7	Read of Google TRO and correspondence from Google's counsel regarding the same [Support for Orders and Filings]
11/19/2024	J.Grall	0.6	\$ 750.00	\$ 450.00	17	Attended hearing on emergency order regarding Google and Voizzit [Trial and Hearing Attendance]
11/19/2024	J.Grall	0.4	\$ 750.00	\$ 300.00	15	Call with Trustee, Jenner Team, and Pashman team to discuss Google orders [Meetings of and Communications with Case Professionals]
11/19/2024	J.Grall	1.2	\$ 750.00	\$ 900.00	7	Review of revisions and correspondence regarding Google TRO [Support for Orders and Filings]
11/19/2024	J.Grall	0.6	\$ 750.00	\$ 450.00	15	Call with Trustee regarding Heiler declaration, Google matter, and various case matters [Meetings of and Communications with Case Professionals]
11/19/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	2	Call with Premier Cloud and Trustee regarding Google security assessment [Business Operations]
11/20/2024	J.Grall	0.7	\$ 750.00	\$ 525.00	15	Call with Trustee, Jenner, Pashman, and Novo teams to discuss Google order and hearing [Meetings of and Communications with Case Professionals]
11/20/2024	J.Grall	1.5	\$ 750.00	\$ 1,125.00	1	Correspondence regarding various operational and case matters, including Cloudflare and Google matters [Case Administration]
11/20/2024	J.Grall	1.0	\$ 750.00	\$ 750.00	2	Call with Premier Cloud regarding Google Cloud account and email correspondence regarding the same [Business Operations]
11/20/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with W. Williams (Jenner) regarding Google Cloud and declaration [Meetings of and Communications with Case Professionals]
11/22/2024	J.Grall	2.5	\$ 750.00	\$ 1,875.00	2	Established access and review of Tangible Play Google account [Business Operations]
11/26/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Epic Employee regarding Google Cloud [Business Operations]

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

Jointly Administered

Date	Name	Hours	Bill Rate	Amount	Task	Description
11/26/2024	J.Grall	1.0	\$ 750.00	\$ 750.00	2	Call with Epic employee regarding Google Cloud project [Business Operations]
12/10/2024	J.Grall	1.6	\$ 750.00	\$ 1,200.00	2	Call with Epic employee regarding Google accounts and invoicing [Business Operations]
<b>Total</b>		<b>41.3</b>		<b>\$ 30,975.00</b>		

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

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10/14/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with M. Root (Jenner) and J. Vandermark, counsel for Google, regarding case and account access [Meetings of and Communications with Case Professionals]
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10/15/2024	J. Grall	0.5	\$ 750.00	\$ 375.00	15	Call with J. Vandermark (Google counsel), M. Root (Jenner), S. Pillay (Jenner) regarding Google account matter [Meetings of and Communications with Case Professionals]
10/16/2024	J. Grall	0.7	\$ 750.00	\$ 525.00	1	Correspondence regarding Google matter [Case Administration]
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11/6/2024	J.Grall	2.0	\$ 750.00	\$ 1,500.00	2	Provisioned Google Workspaces account and reviewed admin sites [Business Operations]
11/7/2024	J.Grall	0.4	\$ 750.00	\$ 300.00	2	Established admin access in Google Workspaces [Business Operations]
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11/18/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	15	Weekly status call with Trustee and Jenner, Pashman, Novo teams to discuss weekly filing deadlines, sanctions hearing, and Google matter [Meetings of and Communications with Case Professionals]

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

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11/18/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with Trustee, M. Root (Jenner), and C. Steege (Jenner) to discuss Google Complaint and TRO [Meetings of and Communications with Case Professionals]
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11/18/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	7	Review of updated Google complaint and TRO [Support for Orders and Filings]
11/19/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	7	Read of Google TRO and correspondence from Google's counsel regarding the same [Support for Orders and Filings]
11/19/2024	J.Grall	0.6	\$ 750.00	\$ 450.00	17	Attended hearing on emergency order regarding Google and Voizzit [Trial and Hearing Attendance]
11/19/2024	J.Grall	0.4	\$ 750.00	\$ 300.00	15	Call with Trustee, Jenner Team, and Pashman team to discuss Google orders [Meetings of and Communications with Case Professionals]
11/19/2024	J.Grall	1.2	\$ 750.00	\$ 900.00	7	Review of revisions and correspondence regarding Google TRO [Support for Orders and Filings]
11/19/2024	J.Grall	0.6	\$ 750.00	\$ 450.00	15	Call with Trustee regarding Heiler declaration, Google matter, and various case matters [Meetings of and Communications with Case Professionals]
11/19/2024	J.Grall	0.8	\$ 750.00	\$ 600.00	2	Call with Premier Cloud and Trustee regarding Google security assessment [Business Operations]
11/20/2024	J.Grall	0.7	\$ 750.00	\$ 525.00	15	Call with Trustee, Jenner, Pashman, and Novo teams to discuss Google order and hearing [Meetings of and Communications with Case Professionals]
11/20/2024	J.Grall	1.5	\$ 750.00	\$ 1,125.00	1	Correspondence regarding various operational and case matters, including Cloudflare and Google matters [Case Administration]
11/20/2024	J.Grall	1.0	\$ 750.00	\$ 750.00	2	Call with Premier Cloud regarding Google Cloud account and email correspondence regarding the same [Business Operations]
11/20/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	15	Call with W. Williams (Jenner) regarding Google Cloud and declaration [Meetings of and Communications with Case Professionals]
11/22/2024	J.Grall	2.5	\$ 750.00	\$ 1,875.00	2	Established access and review of Tangible Play Google account [Business Operations]
11/26/2024	J.Grall	0.5	\$ 750.00	\$ 375.00	2	Call with Epic Employee regarding Google Cloud [Business Operations]

**Epic! Creations, Inc., et al.***Fee Application Detail - Novo Advisors*

09/23/2024 - 12/31/2024

Case 24-11161 (JTD)

Jointly Administered

Date	Name	Hours	Bill Rate	Amount	Task	Description
11/26/2024	J.Grall	1.0	\$ 750.00	\$ 750.00	2	Call with Epic employee regarding Google Cloud project [Business Operations]
12/10/2024	J.Grall	1.6	\$ 750.00	\$ 1,200.00	2	Call with Epic employee regarding Google accounts and invoicing [Business Operations]
<b>Total</b>		<b>41.3</b>		<b>\$ 30,975.00</b>		



**LAW OFFICES OF PANAG & BABU FEES**

Initials	Task Code	Description	Time (in Unit)
IPA	B210 Business Operations	Attention to Voizzit's lawsuit	1
JBH	B210 Business Operations	Attention to Voizzit's lawsuit	1
SSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee Team	1
SSA	B410 General Bankruptcy Advice/Opinions	Attention to Ernakulum suit filed by Voizzit	1
PSA	B410 General Bankruptcy Advice/Opinions	Attention to Ernakulum suit filed by Voizzit	1
PSA	B410 General Bankruptcy Advice/Opinions	Culled out of data regarding the Ernakulum Suit and reviewed the factual inconsistencies via-a-vis previous documents and discussion with Y Sood regarding the same	2.5
PSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee Team	1
PSA	B410 General Bankruptcy Advice/Opinions	Initiated a review of the legal propositions pertaining to inclusion of "foreign law" in "barred by any law" for Order 7 Rule 11 CPC, enforcement of foreign orders through a writ proceedings in India and case laws where the Courts have dismissed/stayed suits filed to defeat pending judicial proceedings outside India.	4.5
YSO	B410 General Bankruptcy Advice/Opinions	Attention to Ernakulum suit filed by Voizzit	1
YSO	B410 General Bankruptcy Advice/Opinions	Preparation of internal note in re. lawsuit	2.5
YSO	B410 General Bankruptcy Advice/Opinions	Internal discussion with P Sarawagi pertaining to the legal strategy to be taken in the Ernakulum suit	0.5
YSO	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee Team	0.5
YSO	B410 General Bankruptcy Advice/Opinions	Review of legal precedents in re. voizzit lawsuit.	5.4
YSO	B410 General Bankruptcy Advice/Opinions	Internal discussion with PSA on the research propositions to be included in judgments for hearing.	3.5
YSO	B410 General Bankruptcy Advice/Opinions	Internal discussion with S Jain and P Sarawagi on the above propositions and carried a further follow up to the finalised judgements	3
YSO	B410 General Bankruptcy Advice/Opinions	Internal discussion with S Sarangi, S Jain and P Sarawagi on the legal strategy to be recommended	2
YSO	B410 General Bankruptcy Advice/Opinions	Drafted the legal strategy email.	1
SSA	B410 General Bankruptcy Advice/Opinions	Internal team discussion re: the legal strategy to be recommended to Claudia regarding the Ernakulum suit	2
SSA	B410 General Bankruptcy Advice/Opinions	Reviewed the legal strategy email with the team.	2
SPA	B210 Business Operations	Attention to correspondence from Apple's counsel	0.3
PSA	B410 General Bankruptcy Advice/Opinions	Internal discussion with Y Sood on the research propositions for voizzit lawsuit	2
PSA	B410 General Bankruptcy Advice/Opinions	Internal discussion with S Jain and Y Sood on the above propositions and carried a further follow up to the finalised judgements.	3
PSA	B410 General Bankruptcy Advice/Opinions	Internal discussion with S Sarangi, S Jain and Y Sood on the legal strategy to be recommended to Claudia regarding the Ernakulum suit	2
PSA	B410 General Bankruptcy Advice/Opinions	Review of the legal propositions in re. jurisdiction	4.5
SJA	B410 General Bankruptcy Advice/Opinions	Attention to Ernakulum suit filed by Voizzit	0.5
SJA	B410 General Bankruptcy Advice/Opinions	Initiated a review of the legal propositions in re. Ernakulum suit.	4
SJA	B410 General Bankruptcy Advice/Opinions	Internal discussion with Y Sood and P Sarawagi on the above propositions and carried a further follow up to the finalised judgements	4.5
SJA	B410 General Bankruptcy Advice/Opinions	Internal discussion with S Sarangi, Y Sood and P Sarawagi on the legal strategy to be recommended	2
SJA	B410 General Bankruptcy Advice/Opinions	Drafted the legal strategy email with Y Sood and P Sarawagi.	0.5
PSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. the Ernakulum Suit and TRO Hearing	0.2
TCH	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. the Ernakulum Suit and TRO Hearing	0.2
SSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. the Ernakulum Suit and TRO Hearing	0.2
SSA	B410 General Bankruptcy Advice/Opinions	Attention to transcript of hearing in Delaware	0.6
YSO	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. the Ernakulum Suit and TRO Hearing	0.2
SJA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. the Ernakulum Suit and TRO Hearing	0.2

Description	Hrs	Rate	Amount
SSA	35.5	525	18637.5
SPA	1.3	525	682.5
JBH	1	475	475
IPA	1	250	250
SJA	12.9	250	3225
YSO	40	175	7000
PSA	23.1	175	4042.5
TCH	1.5	175	262.5
	<b>116.3</b>	<b>2550</b>	<b>34575</b>

PSA	B410 General Bankruptcy Advice/Opinions	Attended call with the Trustee re. IA hearing in the Ernakulum Suit	0.5
PSA	B410 General Bankruptcy Advice/Opinions	Coordinated with the Local counsel in Kerala for filing of the vakaltnama before the Court	0.2
SSA	B210 Business Operations	Confer with S Panag re: Kerala strategy and intimation from defendant counsel	1
SSA	B210 Business Operations	Call with defendant counsel in India in re. Kerala law suit.	0.5
SSA	B210 Business Operations	Coordination and conference calls with India counsel in re. Kerala suit and Delaware court orders.	1.2
SSA	B210 Business Operations	Call with the trustee team in re. developments in the Kerala law suit.	0.5
SPA	B210 Business Operations	Confer with S Sarangi re: Kerala strategy and intimation from defendant counsel	1
SJA	B410 General Bankruptcy Advice/Opinions	Attended call with the Trustee re. IA hearing in the Ernakulum Suit	0.5
TCH	B410 General Bankruptcy Advice/Opinions	Attended call with the Trustee re. IA hearing in the Ernakulum Suit	0.5
SSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee Team	0.2
SSA	B410 General Bankruptcy Advice/Opinions	Preparation for the hearing scheduled in Kerala.	3.5
SJA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.2
PSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.2
PSA	B410 General Bankruptcy Advice/Opinions	Culled out the relevant US orders from the docket for the IA hearing with Y Sood	1
TCH	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.3
YSO	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.2
YSO	B410 General Bankruptcy Advice/Opinions	Culled out the relevant US orders from the docket for the IA hearing with P Sarawagi	2.2
SSA	B410 General Bankruptcy Advice/Opinions	Attention to PI Order and review of all Delaware court proceedings in preparation for the hearing the next day.	4.2
YSO	B410 General Bankruptcy Advice/Opinions	Prepared for the IA hearing in the Ernakulum suit	5.5
SSA	B410 General Bankruptcy Advice/Opinions	Travelled to and attended for the IA hearing in Ernakulum Commercial Court in Kerala	12
SSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
YSO	B410 General Bankruptcy Advice/Opinions	Travelled with S Sarangi and attended for the IA hearing in Ernakulum Commercial Court in Kerala	12
YSO	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
PSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
SJA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
TCH	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
SSA	B410 General Bankruptcy Advice/Opinions	Attended standing call with Trustee Team, Novo Advisors, Jenner & Block and FTI Consulting in re. IA hearing in the Ernakulum Suit	0.5
SSA	B210 Business Operations	Prepared and circulated draft strategy note to India counsel in re. proposed next steps.	4.6

116.3

DESCRIPTION	TIME (IN UNITS)
Standing call with Trustee Team	0.50
Standing call with Trustee Team	0.50
Standing call with Trustee Team	0.50
Attended standing call with the Trustee Team	0.50
Attended standing call with the Trustee Team.	0.50
Standing call with Trustee Team	0.20
Attended standing call with the Trustee Team	0.20
Attended standing call with the Trustee Team.	0.20
Attention to the email dated 7 Januray 2025 issued by the Trustee wherein applications, affidavits filed by Voizzit in the Suit (Voizzit v. Think & Learn & Ors.) were served and review of these applications served to the Trustee.	0.50
Preparation for hearing appearance in Kerela.	0.30
Observed the proceedings before the NCLT at Bengaluru in the insolvency proceedings of Think & Learn	1.50
Prepared for the next hearing in the interim applications in <i>Voizzit v. Think &amp; Learn</i> instituted by Voizzit in Ernakulum Commercial Court	0.50
Attention to documents sent by Voizzit to Novo Advisors, consisting of affidavits and petitions for interim mandatory injunction and temporary prohibitory injunction filed in Ernakulum Commercial Court	0.30
Attention to documents sent by Voizzit to Novo Advisors, consisting of affidavits and petitions for interim mandatory injunction and temporary prohibitory injunction filed in Ernakulum Commercial Court	0.30
Preparation for the hearing scheduled the next day	1.00
Call and coordination with defendant counsel	0.50
Travelled to Kochi with S Jain and attended hearing on behalf of the Trustee in the suit filed by Voizzit (Voizzit v. Think & Learn & Ors.) before the Ernakulum District Court.	12
Travelled to Kochi with Y Sood and attended hearing on behalf of the Trustee in the suit filed by Voizzit (Voizzit v. Think & Learn & Ors.) before the Ernakulum District Court.	12.00
Conducted a general google serach for procuring the email ID of the lawyers of Voizzit for issuing an email for withdrawal of Voizzit Suit.	0.20
Culled out the contact details of Voizzit's counsel employed in the Ernakulum suit.	0.1
Issued an email to Voizzit's lawyers on behalf of the Trustee for withdrawal of suit and providing documents filed with the suit	0.20
Attended standing call with the Trustee Team	0.20
Conducted a review of the legal proposition regarding the evidentiary value of a foreign proceedings in an Indian suit.	1
Attended standing call with the Trustee Team.	0.20
Attended standing call with the Trustee Team.	0.20
Attended standing call with the Trustee Team	0.20
Attention to the email dated 15 January 2025 issued by Melissa regarding ongoing trademark application filed by Osmo Labs and objections made by Tangible Play in that.	0.20
Attended standing call with the Trustee Team.	0.20
Extracted the details of the opposition filed by Tangible Play in Osmo Labs' trademark in India.	0.75
Conducted a review of the trademark registry website to obtain details of the trademark application filed by Osmo Labs and objections filed by Tangible Play.	0.50
Commenced drafting the writ petition to be filed before the Kerala High Court for dismissal of the commercial suit filed by Voizzit before the Commercial Court at Ernakulam	2.00

Description	Hrs	Rate	Amount
SSA	2	525	1050
SPA		525	0
JBH		475	0
SJA	14.3	250	3575
YSO	15.5	175	2712.5
PSA	1.7	175	297.5
TCH	4.4	175	770
	<b>37.9</b>	<b>2300</b>	<b>8405</b>

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

Date	Timekeeper	Task Code	Narrative	Hours Billed	Rate Billed	Billed Amount
12/04/2024	AGambal	B140	Prepared (for upload) order to show cause for TRO violations.	0.20	\$ 450.00	\$ 90.00
12/04/2024	AGambal	B140	Emails with Jenner team re order to show cause for TRO violations.	0.20	\$ 450.00	\$ 90.00
12/04/2024	AGambal	B140	Emails with court re order to show cause for TRO violations.	0.30	\$ 450.00	\$ 135.00
12/04/2024	JBarsal	B140	Revise certificate of counsel regarding advisors fees for Voizzit violations	0.20	\$ 630.00	\$ 126.00
12/04/2024	JBarsal	B140	Correspondence with A. Henchen and L. Salcedo re: service of order to show cause	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with L. Salcedo re: certification of costs	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with C. Steege, M. Root and L. Salcedo re: Pashman damages calculation	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Comment to damages calculation exhibit	0.30	\$ 630.00	\$ 189.00
12/04/2024	KBeilin	B140	Conf. w. L. Salcedo RE: Certificate of costs	0.20	\$ 420.00	\$ 84.00
12/04/2024	JBarsal	B140	Correspondence with L. Salcedo and C. Steege re: CoC for damages calculation	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with N. Washington and A. Gambale re: entry of order to show cause	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with C. Steege and A. Gambale re: rule to show cause	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with C. Steege and A. Gambale re: TRO	0.10	\$ 630.00	\$ 63.00
12/04/2024	JBarsal	B140	Correspondence with L. Salcedo, K. Beilin, A. Gambale, Z. West and R. Noga re: Pashman damages calculation	0.20	\$ 630.00	\$ 126.00
12/04/2024	DSklar	B140	Review of transcript from 12/3 hearing	0.70	\$ 495.00	\$ 346.50
12/04/2024	JBarsal	B140	Correspondence with K. Beilin and S. Sarangi re: Voizzit issues	0.10	\$ 630.00	\$ 63.00
12/05/2024	JBarsal	B140	Correspondence with M. Root, S. Kimmer and D. Saffell re: lender damages calculation	0.10	\$ 630.00	\$ 63.00
12/05/2024	AGambal	B140	Emails with J. Barsalona re revised COC for sanction order fees.	0.20	\$ 450.00	\$ 90.00
12/05/2024	AGambal	B140	Reviewed and revised COC for sanction order fees.	0.20	\$ 450.00	\$ 90.00
12/05/2024	AGambal	B140	Emails with M. Root re fees re sanction order.	0.10	\$ 450.00	\$ 45.00
12/05/2024	JBarsal	B140	Correspondence with A. Gambale re: comments to certificate of costs	0.10	\$ 630.00	\$ 63.00
12/05/2024	KBeilin	B140	Reviewed hearing transcript from 12/3 PI hearing	0.50	\$ 420.00	\$ 210.00
12/06/2024	AGambal	B140	Emails Jenner team, Kirkland team and Pashman team re certification of counsel of fees for sanctions award.	0.80	\$ 450.00	\$ 360.00
12/06/2024	LSalced	B140	Emails re COC for sanctions	0.50	\$ 400.00	\$ 200.00
12/06/2024	JBarsal	B140	Correspondence with R. Shankar, D. Saffell, C. Steege and D. Sklar re: sealing of damages calculation	0.40	\$ 630.00	\$ 252.00
12/06/2024	DSklar	B140	Discussion with Pashman Team concerning motion to seal re sanctions	0.10	\$ 495.00	\$ 49.50
12/06/2024	JBarsal	B140	Correspondence with A. Gambale re: form of damages CoC	0.10	\$ 630.00	\$ 63.00
12/06/2024	JBarsal	B140	Correspondence with C. Steege, C. Springer and M. Root re: damages CoC and accompanying exhibits	0.20	\$ 630.00	\$ 126.00
12/09/2024	LSalced	B140	Call with J. Barsalona re: new Voizzit complaint	0.30	\$ 400.00	\$ 120.00
12/09/2024	LSalced	B140	Calls (x3) with J. Barsalona re: damages calculation	0.30	\$ 400.00	\$ 120.00
12/09/2024	HJaffe	B140	Review email from N. Washington re: scheduling of Indian Complaint TRO (.10)	0.10	\$ 925.00	\$ 92.50
12/09/2024	JBarsal	B140	Correspondence with S. Kimmer, A. Gambale and L. Salcedo re: lender fees sealing issues	0.40	\$ 630.00	\$ 252.00
12/09/2024	JBarsal	B140	Correspondence with A. Gorman and L. Salcedo re: issues regarding sealed documents on Epic claims website	0.20	\$ 630.00	\$ 126.00
12/09/2024	AGambal	B140	Drafted Notice of Withdrawal re COC for attorneys fees/sanctions.	0.10	\$ 450.00	\$ 45.00
12/09/2024	AGambal	B140	Emails with Kirkland team re COC for attorneys fees/sanctions.	0.30	\$ 450.00	\$ 135.00
12/09/2024	LSalced	B140	Prepare for TRO filing	0.70	\$ 400.00	\$ 280.00
12/09/2024	JBarsal	B140	Review and comment to new Voizzit complaint (.5); Review and comment to TRO and brief (.3)	0.80	\$ 630.00	\$ 504.00
12/09/2024	JBarsal	B140	Correspondence with A. Gambale and L. Salcedo re: final CoC for damages	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with A. Gambale, C. Steege, and L. Salcedo re: revised CoC for damages and sealing of same	0.20	\$ 630.00	\$ 126.00
12/09/2024	AGambal	B140	Emails with Jenner team re COC for attorneys fees/sanctions.	0.40	\$ 450.00	\$ 180.00
12/09/2024	AGambal	B140	Telephone calls (x2) with J. Barsalona re COC for attorneys fees/sanctions.	0.50	\$ 450.00	\$ 225.00
12/09/2024	AGambal	B140	Emails with (and telephone calls (x2)) L. Salcedo re COC for attorneys fees/sanctions.	0.70	\$ 450.00	\$ 315.00
12/09/2024	LSalced	B140	Prepare for and file COC re fees	2.10	\$ 400.00	\$ 840.00
12/09/2024	JBarsal	B140	Calls (x2) with A. Gambale re: damages CoC	0.50	\$ 630.00	\$ 315.00
12/09/2024	JBarsal	B140	Correspondence with M. Root, A. Gambale and L. Salcedo re: damages calculation submission to Court	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with D. Saffell, S. Kimmer and A. Gambale re: Lenders damages fees and expenses (.1); Review same (.2)	0.30	\$ 630.00	\$ 189.00

Date	Timekeeper	Task Code	Narrative	Hours Billed	Rate Billed	Billed Amount
12/09/2024	JBarsal	B140	Calls (x3) with L. Salcedo re: damages calculation	0.30	\$ 630.00	\$ 189.00
12/09/2024	KBeilin	B140	Drafted motion to seal related to Certificate of Costs of Services.	0.90	\$ 420.00	\$ 378.00
12/09/2024	JBarsal	B140	Correspondence with A. Gambale re: new Voizzit complaint	0.10	\$ 630.00	\$ 63.00
12/09/2024	LSalced	B140	Prepare agenda for Dec 11 re emergency motion	0.30	\$ 400.00	\$ 120.00
12/09/2024	JBarsal	B140	Correspondence with C. Steege re: emergency hearing	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with K. Beilin re: motion to seal portions of damages calculations	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with W. Williams, C. Steege and A. Henchen re: service of notice to show cause	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Call with L. Salcedo re: new Voizzit complaint	0.30	\$ 630.00	\$ 189.00
12/09/2024	JBarsal	B140	Correspondence with N. Washington re: new Voizzit stay violation and emergency hearing	0.20	\$ 630.00	\$ 126.00
12/09/2024	JBarsal	B140	Review and analyze Voizzit Technology Pvt. Ltd v. Think and Learn complaint (.2); Legal research regarding same (1.4)	1.60	\$ 630.00	\$ 1,008.00
12/09/2024	JBarsal	B140	Correspondence with S. Sarangi and C. Steege re: Voizzit complaint against Trustee in India	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with D. Dandeneau and C. Steege re: India lawsuit by Voizzit	0.10	\$ 630.00	\$ 63.00
12/09/2024	JBarsal	B140	Correspondence with C. Steege and C. Springer re: new Voizzit stay violation	0.10	\$ 630.00	\$ 63.00
12/09/2024	KBeilin	B140	Reviewed India notice to show cause	0.30	\$ 420.00	\$ 126.00
12/10/2024	HJaffe	B140	Review reply to D. Sklar from C. Steege re: TRO papers (.10)	0.10	\$ 925.00	\$ 92.50
12/10/2024	HJaffe	B140	Review email from D. Sklar re: comments to TRO papers (.10)	0.10	\$ 925.00	\$ 92.50
12/10/2024	JBarsal	B140	Correspondence with J. Grall and C. Springer allegations in India complaint	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with A. Guerra re: certificate of service in adversary	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with S. Kimmer and C. Steege re: TRO hearing issues	0.10	\$ 630.00	\$ 63.00
12/10/2024	AGambal	B140	Assisted with filing the second Voizzit complaint and TRO.	0.40	\$ 450.00	\$ 180.00
12/10/2024	AGambal	B140	Emails with Jenner team re second Voizzit complaint and TRO and service of same.	0.50	\$ 450.00	\$ 225.00
12/10/2024	AGambal	B140	Emails with Pashman team re new Voizzit complaint and TRO.	0.50	\$ 450.00	\$ 225.00
12/10/2024	KBeilin	B140	Revised motion to permanently withdraw and file under seal (0.7); corr. w. A. Gambale regarding same (0.1)	0.80	\$ 420.00	\$ 336.00
12/10/2024	JBarsal	B140	Discussion with A. Gambale and L. Salcedo re: hearing preparations	0.30	\$ 630.00	\$ 189.00
12/10/2024	JBarsal	B140	Correspondence with N. Washington and L. Salcedo re: agenda	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with A. Guerra, A. Henchen, L. Salcedo, and W. Williams re: service of new Voizzit complaint and TRO	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with S. Kimmer and C. Steege re: hearing strategy	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with D. Sklar, H. Jaffe and C. Steege re: comments to new Voizzit complaint and accompanying documents	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Revise and finalize notice of hearing on TRO	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Call with L. Salcedo re: agenda for December 11 hearing	0.10	\$ 630.00	\$ 63.00
12/10/2024	LSalced	B140	Prepare for and file complaint, TRO and related documents against Voizzit	2.70	\$ 400.00	\$ 1,080.00
12/10/2024	JBarsal	B140	Revise and finalize complaint (.2), TRO (.1), Brief (.1) and Grall Declaration (.1)	0.50	\$ 630.00	\$ 315.00
12/10/2024	JBarsal	B140	Correspondence with W. Williams and L. Salcedo re: finalization of new Voizzit complaint and motion	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with L. Casey and A. Gambale re: unsealed fee exhibit	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with N. Washington and A. Gambale re: transmission of unsealed damages calculation	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with A. Gambale re: transmission of unsealed documents	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with S. Sarangi and C. Steege re: Indian action diligence	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with R. Shankar re: investigation of India action by Voizzit	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with S. Kimmer re: lender comments to complaint and TRO	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Correspondence with J. Grall and C. Steege re: Grall declaration in support of TRO	0.10	\$ 630.00	\$ 63.00
12/10/2024	JBarsal	B140	Call with H. Jaffe re: new Voizzit adversary	0.50	\$ 630.00	\$ 315.00
12/10/2024	JBarsal	B140	Call with L. Salcedo re: new adversary proceeding against Voizzit	0.20	\$ 630.00	\$ 126.00
12/10/2024	KBeilin	B140	Drafted joint motion to permanently withdraw and file under seal.	1.90	\$ 420.00	\$ 798.00
12/10/2024	DSklar	B140	Review of proposed filings for TRO injunction (.5) and discuss with Jenner Team concerning same (.2)	0.70	\$ 495.00	\$ 346.50
12/10/2024	AGambal	B140	Emails to court (.1) and UST (.1) re sealed documents for COC re attorneys fees.	0.20	\$ 450.00	\$ 90.00
12/11/2024	HJaffe	B140	Email to team re: comments to TRO proposed order (.10)	0.10	\$ 925.00	\$ 92.50

Date	Timekeeper	Task Code	Narrative	Hours Billed	Rate Billed	Billed Amount
12/11/2024	HJaffe	B140	Review proposed Court order for Indian Litigation TRO (.20)	0.20	\$ 925.00	\$ 185.00
12/11/2024	HJaffe	B140	Participate in Court hearing re: Indian Complaint TRO	0.40	\$ 925.00	\$ 370.00
12/11/2024	HJaffe	B140	Email to J. Barsalona re: TRO Hearing (.10)	0.10	\$ 925.00	\$ 92.50
12/11/2024	HJaffe	B140	Email from J. Barsalona re: India TRO hearing (.10)	0.10	\$ 925.00	\$ 92.50
12/11/2024	HJaffe	B140	Prepare for upcoming TRO hearing re: Indian Complaint (.80)	0.80	\$ 925.00	\$ 740.00
12/11/2024	LSalced	B140	Prepare summons and ADR notice re Voizzit complaint	0.40	\$ 400.00	\$ 160.00
12/11/2024	JBarsal	B140	Correspondence with L. Salcedo and D. Sklar re: summons and notice of pretrial conference in new Voizzit adversary	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with D. Dandeneau and M. Root re: Voizzit complaint in India and resulting TRO	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with L. Dorsett and M. Root re: India lawsuit and Amazon India Pvt Ltd	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with J. Vandermark and M. Root re: India lawsuit by Voizzit	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with H. McCullough and M. Root re: Voizzit India action TRO	0.20	\$ 630.00	\$ 126.00
12/11/2024	AGambal	B140	Emails with Jenner team re final version of TRO for Court submission.	0.30	\$ 450.00	\$ 135.00
12/11/2024	AGambal	B140	Emails with K. Beilin and Pashman team re motion to withdraw/seal the COC of attorneys fees.	0.40	\$ 450.00	\$ 180.00
12/11/2024	AGambal	B140	Reviewed and revised motion to withdraw/seal the COC of attorneys fees.	0.50	\$ 450.00	\$ 225.00
12/11/2024	AGambal	B140	Emails with Jenner team re TRO hearing logistics.	0.40	\$ 450.00	\$ 180.00
12/11/2024	AGambal	B140	Emails with Pashman team re TRO hearing logistics.	0.40	\$ 450.00	\$ 180.00
12/11/2024	JBarsal	B140	Correspondence with K. Beilin and C. Steege re: draft motion to seal	0.10	\$ 630.00	\$ 63.00
12/11/2024	KBeilin	B140	Revised motion to permanently remove and seal certification of damages (0.1); corr. w. M. Root, C. Steege, W. Williams regarding same (0.1); corr. w. J. Barsalona regarding same	0.30	\$ 420.00	\$ 126.00
12/11/2024	JBarsal	B140	Correspondence with L. Salcedo re: TRO hearing transcript	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with A. Guerra, A. Henchen and L. Salcedo re: service of TRO	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with L. Salcedo re: entry of TRO	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Comment to motion to seal lenders fees	0.30	\$ 630.00	\$ 189.00
12/11/2024	JBarsal	B140	Correspondence with L. Salcedo re: hearing coordination with Byju's Alpha	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with C. Steege and A. Gambale re: service of TRO and certificate of service	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with C. Steege, H. Jaffe and A. Gambale re: revised TRO (.1); Review same (.1)	0.20	\$ 630.00	\$ 126.00
12/11/2024	JBarsal	B140	Correspondence with A. Gambale, L. Salcedo and H. Jaffe re: form of TRO order	0.20	\$ 630.00	\$ 126.00
12/11/2024	JBarsal	B140	Correspondence with M. Root re: hearing preparations	0.10	\$ 630.00	\$ 63.00
12/11/2024	JBarsal	B140	Correspondence with A. Gambale and H. Jaffe re: hearing preparations	0.20	\$ 630.00	\$ 126.00
12/11/2024	KBeilin	B140	Reviewed revised motion to permanently withdraw and seal certificate of damages	0.10	\$ 420.00	\$ 42.00
12/11/2024	LSalced	B140	Revised TRO and upload the same	0.60	\$ 400.00	\$ 240.00
12/12/2024	LSalced	B140	Prepare for and file redacted COC re damages cost	0.50	\$ 400.00	\$ 200.00
12/12/2024	LSalced	B140	Prepare for and file notice of removal	0.30	\$ 400.00	\$ 120.00
12/12/2024	AGambal	B140	Reviewed and approved motion to seal/motion withdraw COC (and public version of the document) for filing.	0.30	\$ 450.00	\$ 135.00
12/12/2024	AGambal	B140	Emails with Jenner and K&E re motion to seal/motion withdraw COC.	0.30	\$ 450.00	\$ 135.00
12/12/2024	AGambal	B140	Emails with Pashman team re motion to seal/motion withdraw COC and public version of the same.	0.40	\$ 450.00	\$ 180.00
12/12/2024	JBarsal	B140	Correspondence with A. Henchen and L. Salcedo re: service of motion to seal and redacted CoC	0.10	\$ 630.00	\$ 63.00
12/12/2024	JBarsal	B140	Correspondence with C. Springer and W. Williams re: Voizzit press release (.1); Review same (.2)	0.30	\$ 630.00	\$ 189.00
12/12/2024	DSklar	B140	Review of articles concerning litigation against Voizzit	0.20	\$ 495.00	\$ 99.00
12/12/2024	KBeilin	B140	Corr. w. S. Kimmer RE: sealed exhibits to motion to file under seal	0.10	\$ 420.00	\$ 42.00
12/12/2024	DSklar	B140	Review of transcript from the TRO hearing concerning India law suit	0.10	\$ 495.00	\$ 49.50
12/12/2024	JBarsal	B140	Correspondence with K. Beilin, A. Gambale and L. Salcedo re: final sealing motion for filing and related exhibits	0.10	\$ 630.00	\$ 63.00
12/12/2024	LSalced	B140	Prepare for and file motion for seal	0.50	\$ 400.00	\$ 200.00
12/12/2024	KBeilin	B140	Revised Motion to Seal and prepared for filing (0.3); conf. w. L. Salcedo regarding same (0.1)	0.40	\$ 420.00	\$ 168.00
12/12/2024	JBarsal	B140	Correspondence with A. Gorman and L. Salcedo re: service of summons and complaint in new Voizzit adversary	0.10	\$ 630.00	\$ 63.00
12/12/2024	LSalced	B140	Prepare for and file summons and ADR	0.60	\$ 400.00	\$ 240.00
12/12/2024	JBarsal	B140	Correspondence with S. Panag and A. Gambale re: transcript of December 11 hearing	0.10	\$ 630.00	\$ 63.00



Date	Timekeeper	Task Code	Narrative	Hours Billed	Rate Billed	Billed Amount
12/12/2024	JBarsal	B140	Correspondence with S. Kimmer and K. Beilin re: Kirkland comments to motion to seal (.1); Review same (.1)	0.20	\$ 630.00	\$ 126.00
12/12/2024	JBarsal	B140	Correspondence with K. Beilin, A. Gambale and W. Williams re: Jenner comments to motion to seal damages CoC	0.10	\$ 630.00	\$ 63.00
12/12/2024	KBeilin	B140	Revised motion to permanently remove cert from docket (0.1); corr. w. Jenner, K&E regarding same (0.1)	0.20	\$ 420.00	\$ 84.00
12/12/2024	KBeilin	B140	Reviewed transcript from 12/11 emergency hearing.	0.20	\$ 420.00	\$ 84.00
12/12/2024	JBarsal	B140	Correspondence with D. Sklar and L. Salcedo re: summons of new Voizzit complaint	0.10	\$ 630.00	\$ 63.00
12/12/2024	JBarsal	B140	Correspondence with A. Gambale and C. Springer re: December 11 hearing transcript	0.10	\$ 630.00	\$ 63.00
12/13/2024	HJaffe	B140	Calls (x2) w/J. Barsalona re: case strategy issues	0.90	\$ 925.00	\$ 832.50
12/13/2024	HJaffe	B140	Reply to email from J. Barsalona re: Vellapalath article (.10)	0.10	\$ 925.00	\$ 92.50
12/13/2024	HJaffe	B140	Review email from J. Barsalona re: Vellapalath article (.10)	0.10	\$ 925.00	\$ 92.50
12/13/2024	LSalced	B140	Emails with paralegal from Young Conaway re Dec 18 agenda	0.20	\$ 400.00	\$ 80.00
12/16/2024	JBarsal	B140	Correspondence with L. Salcedo and A. Gambale re: CNO for PI	0.10	\$ 630.00	\$ 63.00
12/16/2024	AGambal	B140	Emails with L. Salcedo re revised CNO for PI Order.	0.10	\$ 450.00	\$ 45.00
12/16/2024	AGambal	B140	Reviewed and revised CNO for PI Order.	0.10	\$ 450.00	\$ 45.00
12/16/2024	LSalced	B140	Prepare CNO re PI	0.40	\$ 400.00	\$ 160.00
12/16/2024	AGambal	B140	Review and finalize 2nd Voizzit PI Order for upload.	0.20	\$ 450.00	\$ 90.00
12/16/2024	AGambal	B140	Emails with L. Salcedo and J. Barsalona re 2nd Voizzit PI Order.	0.30	\$ 450.00	\$ 135.00
12/16/2024	AGambal	B140	Telephone call with J. Barsalona, D. Sklar, H. Jaffe, K. Beilin, Jenner team, Novo team and client re 2nd Voizzit PI hearing and other outstanding items.	0.50	\$ 450.00	\$ 225.00
12/16/2024	JBarsal	B140	Correspondence with A. Gambale re: PI Order edits	0.10	\$ 630.00	\$ 63.00
12/16/2024	LSalced	B140	Prepare agenda for Dec 19	0.80	\$ 400.00	\$ 320.00
12/16/2024	JBarsal	B140	Correspondence with C. Steege, W. Williams and A. Gambale re: form of PI (.1); Review and comment to same (.1)	0.20	\$ 630.00	\$ 126.00
12/16/2024	JBarsal	B140	Analysis of PI issues	0.30	\$ 630.00	\$ 189.00
12/17/2024	HJaffe	B140	Review email from J. Barsalona to Court re: preliminary injunction (.10)	0.10	\$ 925.00	\$ 92.50
12/17/2024	HJaffe	B140	Email to J. Barsalona re: PI re: India suit (.10)	0.10	\$ 925.00	\$ 92.50
12/17/2024	JBarsal	B140	Correspondence with D. Dandeneau and C. Steege re: summons from India	0.10	\$ 630.00	\$ 63.00
12/17/2024	AGambal	B140	Filed notice of PI Order (2nd Voizzit PI Order).	0.20	\$ 450.00	\$ 90.00
12/17/2024	AGambal	B140	Drafted notice of PI Order (2nd Voizzit PI Order).	0.20	\$ 450.00	\$ 90.00
12/17/2024	AGambal	B140	Emails with Jenner team and client re notice of PI Order (2nd Voizzit PI Order) and CNO re same.	0.40	\$ 450.00	\$ 180.00
12/17/2024	AGambal	B140	Emails with the Court re notice of PI Order (2nd Voizzit PI Order) and CNO re same.	0.20	\$ 450.00	\$ 90.00
12/17/2024	AGambal	B140	Emails with J. Barsalona re notice of PI Order (2nd Voizzit PI Order).	0.50	\$ 450.00	\$ 225.00
12/17/2024	JBarsal	B140	Correspondence with A. Henchen and L. Salcedo re: service of agenda and notice of proposed PI order	0.10	\$ 630.00	\$ 63.00
12/17/2024	LSalced	B140	Prepare for and file Dec 19 agenda	0.60	\$ 400.00	\$ 240.00
12/17/2024	JBarsal	B140	Correspondence with C. Springer and A. Gambale re: notice of proposed PI	0.10	\$ 630.00	\$ 63.00
12/17/2024	JBarsal	B140	Correspondence with H. Jaffe re: preliminary injunction issues	0.10	\$ 630.00	\$ 63.00
12/17/2024	JBarsal	B140	Comment to notice of proposed preliminary injunction	0.10	\$ 630.00	\$ 63.00
12/17/2024	JBarsal	B140	Correspondence with A. Gambale re: notice of proposed PI	0.10	\$ 630.00	\$ 63.00
12/17/2024	JBarsal	B140	Correspondence with C. Steege, C. Springer and M. Root re: PI hearing and related issues	0.10	\$ 630.00	\$ 63.00
12/17/2024	JBarsal	B140	Correspondence with N. Washington and L. Haney re: CNO for preliminary injunction	0.20	\$ 630.00	\$ 126.00
12/17/2024	JBarsal	B140	Attention to PI issues	0.10	\$ 630.00	\$ 63.00
12/18/2024	AGambal	B140	Emails with P&B re 2nd Voizzit PI Order.	0.20	\$ 450.00	\$ 90.00
12/18/2024	AGambal	B140	Emails with Court re CNO for 2nd Voizzit PI Order.	0.20	\$ 450.00	\$ 90.00
12/18/2024	AGambal	B140	Emails with C. Steege and Jenner team re CNO for 2nd Voizzit PI Order.	0.30	\$ 450.00	\$ 135.00
12/18/2024	AGambal	B140	Discussions with L. Salcedo re filing the CNO re 2nd Voizzit PI Order.	0.40	\$ 450.00	\$ 180.00
12/18/2024	JBarsal	B140	Correspondence with S. Sarangi and A. Gambale re: entry of preliminary injunction against India litigation	0.10	\$ 630.00	\$ 63.00
12/18/2024	JBarsal	B140	Correspondence with A. Gorman and L. Salcedo re: service of PI and amended agenda	0.10	\$ 630.00	\$ 63.00
12/18/2024	LSalced	B140	Prepare for and file CNO re PI	0.50	\$ 400.00	\$ 200.00
12/18/2024	LSalced	B140	Prepare amended agenda for Dec 19 hearing	0.50	\$ 400.00	\$ 200.00

Date	Timekeeper	Task Code	Narrative	Hours Billed	Rate Billed	Billed Amount
12/18/2024	JBarsal	B140	Correspondence with N. Washington and L. Salcedo re: CNO and PI	0.10	\$ 630.00	\$ 63.00
12/18/2024	JBarsal	B140	Correspondence with C. Steege, A. Gambale and L. Salcedo re: service of PI	0.10	\$ 630.00	\$ 63.00
12/18/2024	JBarsal	B140	Correspondence with A. Gambale, C. Springer and C. Steege re: CNO for PI	0.10	\$ 630.00	\$ 63.00
12/19/2024	HJaffe	B140	Attend conference call w/Indian counsel re: Indian law suit	0.40	\$ 925.00	\$ 370.00
12/19/2024	LSalced	B140	Prepare CNO re motion to seal	0.20	\$ 400.00	\$ 80.00
12/19/2024	JBarsal	B140	Correspondence with H. Jaffe and A. Gambale re: Voizzit litigation issues	0.10	\$ 630.00	\$ 63.00
12/20/2024	AGambal	B140	Emails with B. Williams re sealed COC for attorneys fees.	0.30	\$ 450.00	\$ 135.00
12/20/2024	AGambal	B140	Review and finalized CNO for motion to seal/withdraw.	0.10	\$ 450.00	\$ 45.00
12/20/2024	JBarsal	B140	Correspondence with H. Jaffe re: adversary issues	0.10	\$ 630.00	\$ 63.00
12/26/2024	LSalced	B140	Prepare agenda for Jan 13 order to show cause	0.20	\$ 400.00	\$ 80.00
12/30/2024	AGambal	B140	Finalized and filed CNO for motion to seal/withdraw.	0.30	\$ 450.00	\$ 135.00
01/06/2025	JBarsal	B140	Correspondence with L. Salcedo re: show cause hearing	0.10	\$ 695.00	\$ 69.50
01/07/2025	AGambal	B140	Drafted witness and exhibit list for 1/13 hearing.	0.30	\$ 485.00	\$ 145.50
01/07/2025	AGambal	B140	Emails with the C. Steege and Pashman team re witness and exhibit list for 1/13 hearing.	0.50	\$ 485.00	\$ 242.50
01/07/2025	JBarsal	B140	Correspondence with L. Salcedo and A. Gambale re: January 13 hearing agenda	0.10	\$ 695.00	\$ 69.50
01/07/2025	JBarsal	B140	Correspondence with C. Springer, C. Steege and A. Gambale re: January 13 contempt hearing preparations	0.20	\$ 695.00	\$ 139.00
01/07/2025	JBarsal	B140	Correspondence with A. Gambale and L. Salcedo re: preparations for January 13 show cause hearing	0.10	\$ 695.00	\$ 69.50
01/08/2025	JBarsal	B140	Correspondence with A. Gambale, C. Steege, and C. Springer re: witness and exhibit list for contempt hearing	0.20	\$ 695.00	\$ 139.00
01/08/2025	AGambal	B140	Emails with C. Steege and Client re declaration for order to show cause hearing.	0.30	\$ 485.00	\$ 145.50
01/08/2025	JBarsal	B140	Correspondence with A. Gambale and L. Salcedo re: notice of adjourned show cause hearing	0.10	\$ 695.00	\$ 69.50
01/08/2025	LSalced	B140	Prepare and file notice of rescheduled hearing	0.50	\$ 430.00	\$ 215.00
01/08/2025	AGambal	B140	Emails with the Jenner team and K&E team re moving order to show cause hearing.	0.20	\$ 485.00	\$ 97.00
01/08/2025	AGambal	B140	Emails with the Court re moving order to show cause hearing.	0.30	\$ 485.00	\$ 145.50
01/08/2025	AGambal	B140	Zoom call with C. Steege, M. Root, J. Grall, J. Barsalona and client re contempt/order to show cause hearing strategy.	0.30	\$ 485.00	\$ 145.50
01/08/2025	JBarsal	B140	Correspondence with S. Kimmer, R. Shankar, C. Steege and A. Gambale re: adjournment of contempt hearing	0.10	\$ 695.00	\$ 69.50
01/08/2025	JBarsal	B140	Correspondence with C. Steege, C. Springer and A. Gambale re: adjournment of show cause hearing	0.10	\$ 695.00	\$ 69.50
01/08/2025	JBarsal	B140	Correspondence with A. Gambale re: show cause issues	0.10	\$ 695.00	\$ 69.50
01/08/2025	JBarsal	B140	Correspondence with N. Washington and A. Gambale re: adjournment of order to show cause hearing	0.20	\$ 695.00	\$ 139.00
01/09/2025	JBarsal	B140	Correspondence with A. Gambale re: attorneys fees for contempt hearing	0.10	\$ 695.00	\$ 69.50
01/09/2025	JBarsal	B140	Correspondence with R. Shankar and C. Steege re: Springer declaration for contempt hearing (.1); Review and comment to same (.1)	0.20	\$ 695.00	\$ 139.00
01/10/2025	JBarsal	B140	Correspondence with S. Kimmer and C. Steege re: comments to Springer declaration in support of Voizzit contempt (.1); Review lenders comments to same (.1)	0.20	\$ 695.00	\$ 139.00
01/15/2025	LSalced	B140	Updated PSWH damages calculations	0.50	\$ 430.00	\$ 215.00
01/16/2025	JBarsal	B140	Call with H. Jaffe re: contempt hearing issues	0.30	\$ 695.00	\$ 208.50
01/16/2025	AGambal	B140	Edited and sent out the witness and exhibit list for OTSC hearing.	0.2	\$ 485.00	\$ 97.00
01/16/2025	AGambal	B140	Reviewed and revised 1/22 hearing agenda.	0.1	\$ 485.00	\$ 48.50
01/16/2025	AGambal	B140	Telephone calls (x2) with L. Salcedo re updated fees for Claudia declaration's (for OTSC hearing).	0.9	\$ 485.00	\$ 436.50
01/16/2025	LSalced	B140	Revised PSWH damages costs	0.70	\$ 430.00	\$ 301.00
01/16/2025	LSalced	B140	Revise agenda for Jan 22	0.30	\$ 430.00	\$ 129.00
01/16/2025	LSalced	B140	Call with A. Gambale re Pashman damages costs (x2)	0.90	\$ 430.00	\$ 387.00
<b>Total</b>				<b>62.90</b>		<b>\$ 32,949.50</b>