

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: EPIC! CREATIONS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 24-11161 (JTD) (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google, LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered) Re: Adv. D.I. 18 & 39

**CERTIFICATION OF COUNSEL SUBMITTING
(I) PROPOSED SCHEDULING ORDER AND (II) PROPOSED DISCOVERY ORDER**

The undersigned counsel to Claudia Z. Springer, not individually but as the Chapter 11 Trustee (the “Trustee”) of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. (the “Debtors” and, each, a “Debtor”) and Plaintiff in the above-captioned adversary proceeding, hereby certifies the following:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).



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1. On November 26, 2024, the Plaintiff filed the *Chapter 11 Trustee’s Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Court’s November 19 Order* (the “Contempt Motion”).² See Adv. Pro. D.I. 18.

2. On December 4, 2024, the Court entered the *Order to Show Cause* (the “Order”), ordering the Voizzit to appear on January 13, 2025. See Adv. Pro. D.I. 39.

3. On January 8, 2025, the Plaintiff filed a Notice of Rescheduled Hearing, rescheduling the hearing to January 22, 2025 (the “Show Cause Hearing”). See Adv. Pro. D.I. 46.

4. At the Show Cause Hearing, the Court heard brief argument as it relates to the Voizzit Defendants’ request for a continuance of the Show Cause Hearing.

5. After argument, the Court adjourned the Show Case Hearing for one week and instructed the parties to submit a proposed scheduling order with respect to the briefing schedule and the rescheduled hearing date. Attached hereto as **Exhibit A** is the proposed scheduling order (the “Proposed Scheduling Order”).

6. Additionally, while the Court granted a brief continuance of the Show Cause Hearing, the Court also granted the Plaintiff ability to conduct expedited discovery as it relates to the Order. Attached hereto as **Exhibit B** is the proposed expedited discovery order (the “Proposed Discovery Order”).

7. Plaintiff’s counsel conferred with (i) Voizzit Technology Private Ltd., Voizzit Information Technology LLC and Rajendran Vellapalath’s counsel,³ and (ii) GLAS Trust Company LLC’s counsel with respect to the language of both the Proposed Scheduling Order and Proposed Discovery Order.

² Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Contempt Motion.

³ Google, LLC is no longer a party to this action, see Adv. D.I. 54, and it is the Trustee’s understanding that Vinay Ravindra is unrepresented as of the date of this Certification of Counsel.

WHEREFORE, the undersigned respectfully requests entry of the Proposed Scheduling Order and Proposed Discovery Order, at the Court's earliest convenience.

Dated: January 22, 2025
Wilmington, Delaware

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

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EXHIBIT A

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

In re: EPIC! CREATIONS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 24-11161 (JTD) (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google, LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) Re: Adv. D.I. 18 & 39

SCHEDULING ORDER FOR ORDER TO SHOW CAUSE

The Court held a hearing on January 22, 2025 to hear evidence on the *Order to Show Cause* [Adv. D.I. 39]² (the “Show Cause Hearing”);

After consideration at the Show Cause Hearing, the Court extended certain deadlines;

IT IS HEREBY ORDERED THAT:

1. The Show Cause Hearing is **rescheduled** and will take place, in person, on **Wednesday, January 29, 2025 at 1:00 P.M. (ET)** (the “Rescheduled Show Cause Hearing”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).

² Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the *Order to Show Cause*.

2. Defendants must retain Delaware local counsel by the Rescheduled Show Cause Hearing.
3. All parties are to appear in person at the Rescheduled Show Cause Hearing.
4. Defendants must file any response papers to the *Order to Show Cause* by Monday, January 27, 2025, at 5:00 P.M. (ET).
5. Plaintiff(s) must file any reply papers on Tuesday, January 28, 2025, at 5:00 P.M. (ET).

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
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Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google, LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) Re: Adv. D.I. 18 & 39

ORDER TO SHOW CAUSE EXPEDITED DISCOVERY ORDER

The Court held a hearing on January 22, 2025 to hear evidence on the *Order to Show Cause* [Adv. D.I. 39]² (the “Show Cause Hearing”);

After consideration of the arguments set forth at the Show Cause Hearing, the Court determined that expedited discovery is necessary;

IT IS HEREBY ORDERED THAT:

1. Plaintiff(s) in the above-captioned adversary proceeding, including any party-in-

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interest that seeks to intervene, may take discovery, on an **expedited** basis, in connection with the *Order to Show Cause*, which may be in the form of depositions or written discovery (the “Expedited Discovery”).

2. Any such Plaintiff(s) may serve the Expedited Discovery prior to the rescheduled Show Cause hearing which is now scheduled for January 29, 2025 at 1:00 P.M. (ET)

3. Defendants are required to respond to the Expedited Discovery within the time parameters set forth in the Expedited Discovery.