

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

In re:)
) Chapter 11
EPIC! CREATIONS, INC., ¹)
) Case No. 24-11161 (JTD)
Debtors.)
) (Jointly Administered)
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Claudia Z. Springer, Chapter 11 Trustee,) Adv. Pro. No. 24-50233 (JTD)
)
Plaintiff,)
)
v.)
)
Google, LLC,)
Voizzit Technology Private Ltd.,)
Voizzit Information Technology LLC,)
Vinay Ravindra,)
Rajendran Vellapalath,)
)
Defendants.)
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**GLAS TRUST COMPANY LLC’S MOTION TO SHORTEN
NOTICE OF MOTION TO INTERVENE**

GLAS Trust Company LLC (“GLAS”) files this motion (the “Motion to Shorten”) seeking entry of an order (the “Order”), substantially in the form attached hereto as **Exhibit A**, shortening notice of the Motion to Intervene (the “Motion”), filed contemporaneously herewith, setting the hearing to consider entry of an order approving the Motion on **January 29, 2025 at 1:00 p.m. (prevailing Eastern Time)** (the “Hearing”) and setting the objection deadline on the Motion on **January 28, 2025 at 4:00 p.m. (prevailing Eastern Time)**, and (b) granting related relief.

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).

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157(a) and 1334(b), and the *Amended Standing Order of Reference* from the the U.S. District Court for the District of Delaware, dated February 29, 2012. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408-1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Pursuant to Rule 7008-1 of the Local Rules of Bankruptcy Practice and Procedure of the U.S. Bankruptcy Court for the District of Delaware, GLAS consents to the entry of final orders and judgments by the Court in connection with this Motion to Shorten to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

RELIEF REQUESTED

3. Local Rule 9006-1 requires that “all motion papers shall be filed and served in accordance with Local Rule 2022-1(b) at least fourteen (14) days prior to the hearing date,” with the exception of “Retention motions . . . Sale Procedure Motions . . . and voting procedures motions,” which “must be filed at least twenty-one (21) days prior to the hearing date.” Del. Bankr. L.R. 9006-1(c)(i). Further, “[n]o motion will be scheduled on less notice than required by these Local Rules or the Fed. R. Bankr. P. *except by order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice.*” Del. Bankr. L.R. 9006-1(e) (stating also: “The Court will rule on such motion for shortened notice promptly without need for a hearing”) (emphasis added).

4. Pursuant to Bankruptcy Rule 9006(c), the Court “for cause shown may in its discretion with or without motion or notice order the [notice] period reduced.” Fed. R. Bankr. P. 9006(c)(1). Section 105(a) of the Bankruptcy Code provides that the Court “may issue any order,

process, or judgment that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code. 11 U.S.C. § 105(a).

5. In exercising such discretion, the Court should “consider the prejudice to parties entitled to notice and weigh this against the reasons for hearing the motion on an expedited basis.” *In re Phila. Newspapers, LLC*, 690 F.3d 161, 172 (3d Cir. 2012) (noting the commonality of such motions given the accelerated time frame of bankruptcy proceedings); *see also Hester v. NCNB Nat’l Bank (In re Hester)*, 899 F.2d 361, 364 n.3 (5th Cir. 1990) (“[M]otions for material reductions in the notice period are routinely granted by bankruptcy courts.”).

6. For the reasons set forth below, GLAS respectfully submits that sufficient cause exists to shorten the notice period with respect to the Motion and the relief requested therein. Should the Court grant this Motion to Shorten, GLAS requests that the Court consider the Motion at the scheduled hearing date on the Chapter 11 Trustee’s pending motion for contempt against the Voizzit Defendants on **January 29, 2025 at 1:00 p.m. (prevailing Eastern Time)** (the “Hearing”) and setting the objection deadline on **January 28, 2025 at 4:00 p.m. (prevailing Eastern Time)**.

7. Here, there is ample cause to grant this Motion to Shorten. As set forth in the Motion, the outcome of the rescheduled show cause hearing, now set for January 29, 2025 at 1:00 P.M. (ET) (the “Rescheduled Show Cause Hearing”) could determine the return of more than a million dollars to the Debtors’ estates and affect the Debtors’ rights to control significant portions of this business, which have been subject to collateral attacked from defendants Voizzit Technology Private Ltd. (“Voizzit India”), Voizzit Information Technology LLC (“Voizzit UAE,” and together with Voizzit India, the “Voizzit Entities”), Rajendran Vellapalath (together with the Voizzit Entities, the “Voizzit Defendants”), and those working in concert with them. While GLAS is generally aligned with the Debtors’ chapter 11 Trustee (the “Trustee”), GLAS’s significant

interest in the Debtors' estates is not fully protected by the Trustee, who's fiduciary duty is to the estate as a whole. With the Court's permission, GLAS seeks to make additional arguments during the Rescheduled Show Cause Hearing, which it believes will aid the Court in its resolution of the issues before it.

8. Accordingly, GLAS requests that the Court schedule the Motion to be heard at the scheduled hearing date on **January 29, 2025 at 1:00 p.m. (prevailing Eastern Time)** (the "Hearing") and setting the objection deadline on **January 28, 2025 at 4:00 p.m. (prevailing Eastern Time)**. Pursuant to Local Rule 9006-1(e), GLAS requests that the relief requested by the Motion to Shorten be entered without a hearing.

LOCAL RULE 9006-1(E) AVERMENT

9. On January 23, 2025, GLAS's counsel communicated its intent to seek shortened notice on the Motion with counsel to the Trustee. The Trustee did not object. On January 23, 2025, GLAS's counsel communicated its intent to seek shortened notice on the Motion to Ravindra, in his individual capacity, and counsel to the Voizzit Defendants. As of the filing of this Motion to Shorten, GLAS has not received a response from either Ravindra or the Voizzit Defendants, but stands ready to work through any concerns or objections that may be raised post-filing. On January 23, 2025, GLAS's counsel communicated its intent to seek shortened notice on the Motion with the Office of the United States Trustee (the "U.S. Trustee"). The U.S. Trustee took no position.

NOTICE

10. Notice of the hearing on the relief requested in this Motion to Shorten will be provided by facsimile, electronic mail (where available), overnight courier or hand delivery, to the following parties: (a) the Trustee; (b) the U.S. Trustee; (c) counsel to the Voizzit Defendants; (d)

Vinay Ravindra; and (e) any party that has requested notice pursuant to Bankruptcy Rule 2002 (collectively, the “Notice Parties”). GLAS submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, for the foregoing reasons, GLAS respectfully requests that this Court enter an order, substantially in the form attached hereto, respectively, granting the relief requested in this Motion to Shorten and granting such other and further relief as is appropriate under the circumstances.

Dated: January 24, 2025
Wilmington, Delaware

/s/ Laura Davis Jones

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Exhibit A

Proposed Order

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

In re:)	
)	Chapter 11
EPIC! CREATIONS, INC., ¹)	
)	Case No. 24-11161 (JTD)
Debtors.)	
)	(Jointly Administered)
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Claudia Z. Springer, Chapter 11 Trustee,)	Adv. Pro. No. 24-50233 (JTD)
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Plaintiff,)	
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v.)	
)	
Google, LLC,)	
Voizzit Technology Private Ltd.,)	
Voizzit Information Technology LLC,)	
Vinay Ravindra,)	
Rajendran Vellapalath,)	
)	
Defendants.)	
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**ORDER SHORTENING THE NOTICE AND OBJECTION PERIOD
FOR GLAS TRUST COMPANY LLC’S MOTION TO INTERVENE**

Upon consideration of the motion (the “Motion to Shorten”)² of GLAS Trust Company, LLC (“GLAS”) for entry of an order (this “Order”) (a) shortening the notice period *for GLAS Trust Company LLC’s Motion to Intervene* (the “Motion”) and scheduling a hearing on the Motion on **January 29, 2025 at 1:00 p.m. (prevailing Eastern Time)** (the “Hearing”) and setting the objection deadline for the Motion on **January 28, 2025 at 4:00 p.m. (prevailing Eastern Time)**, and (b) granting related relief, all as more fully set forth in the Motion to Shorten; and this Court

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 used but not otherwise defined herein have the meanings given to them in the Motion to Shorten.

having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion to Shorten in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion to Shorten is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that notice of the Motion to Shorten was appropriate and no other or further notice need be provided; and this Court having reviewed the Motion to Shorten; and this Court having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein, without the need for a hearing; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion to Shorten is granted as set forth herein.
2. The Hearing to consider the Motion shall be held on **January 29, 2025 at 1:00 p.m. (prevailing Eastern Time)**.
3. Responses or objections to the Motion and to the relief requested therein must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the District of Delaware, and shall be filed with the Court no later than **January 28, 2025 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline").
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
5. GLAS is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion to Shorten.

6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.