

**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)

**VOIZZIT INFORMATION TECHNOLOGY LLC, VOIZZIT
TECHNOLOGY PRIVATE LIMITED, AND RAJENDRAN
VELLAPALATH’S MOTION FOR PROTECTIVE ORDER**

Voizzit Technology Private Ltd. (“Voizzit Technology”), Voizzit Information Technology LLC (“Voizzit LLC”), and Rajendran Vellapalath (“Vellapalath”) (all parties collectively referred as “Voizzit”), party-in-interest in the above-captioned Chapter 11 cases, by and through their undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, as made applicable herein by Rule 7026 of the Federal Rules of Bankruptcy

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).



Procedure, hereby respectfully submits this motion (the “Motion”) for a protective order striking or limiting the scope of the requests for document production (the “Document Requests”) propounded by Claudia Z. Springer (“Trustee”), in connection with the Court’s Order to Show Cause [Adv. D.I. 39]. In support of this Motion, Voizzit respectfully represents as follows:

JURISDICTION

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. The statutory predicates for the relief sought herein are Rules 26 and 34 of the Federal Rules of Civil Procedure (“Federal Rules”), Rule 7026 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), and section 105(a) of the Bankruptcy Code.

RELEVANT BACKGROUND

3. Voizzit was founded in 2021 and has grown into a multi-faceted entrepreneurial organization that specializes primarily in IT services, but has branches that specialize in travel, media, and education services as well.

4. On September 4, 2023, Think & Learn Private Limited (“T&L”) entered into a certain Loan Agreement (the “Loan Agreement”) with Riju Ravindran for a principal amount of \$100 million (₹821.5 crores) with 5% annual interest and maturity date of September 30, 2024. The Loan Agreement included strategic conversion rights for 100% ownership of Debtors Epic! Creations, Inc. (“Epic”) and Tangible Play, Inc. (“Tangible Play”), including control over all digital platforms, assets, and user data.

5. On December 1, 2023, Riju Ravindran assigned all his rights under the Loan Agreement to Voizzit through an Assignment Deed for a consideration of \$25.5 million. This assignment transferred all debt rights, conversion options, platform control rights, and

enforcement mechanisms. Proper notice of this assignment was issued to T&L, relevant platforms, regulatory authorities, and service providers.

6. Voizzit established exclusive ownership of Epic and Tangible Play, including their assets, intellectual property, and associated rights, based on authenticated and legally certified documentation executed before Dubai Courts and certified by a Special Notary Public. Their ownership commenced as of April 2, 2024, well before the bankruptcy proceedings.

7. Chapter 11 involuntary bankruptcy was instituted against Epic , Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play on June 4-5, 2024. Voizzit was first notified of these Chapter 11 proceedings on November 4, 2024, via an email from the Debtors’ claims and noticing agent. Voizzit had no prior notice of these bankruptcy cases or the orders entered in the cases. On November 18, 2024 the Trustee initiated an adversary proceeding (the “Adversary Proceeding”) by filing the *Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, Turnover of Estate Property and Records, and to Enforce the Automatic Stay* [Adv. D.I. 1] (the “Complaint”) against Voizzit, Vinay Ravindra, and Google LLC requesting, among other things, the entry of a temporary restraining order and preliminary injunction against Google and Voizzit.

8. On November 19, 2024, this Court held a hearing to consider the Complaint and entered a temporary restraining order (the “TRO”) [Adv. D.I. 14], scheduled a hearing to consider the preliminary injunction for December 3, 2024, at 9:00 a.m. (ET) (the “PI Hearing”), and set an objection deadline for no later than three (3) business days prior to the PI Hearing.

9. Voizzit has substantially complied with the terms of the TRO and Preliminary Injunction where possible while working with counsel to prepare their Motion to Adjourn [Adv. D.I. 59] and intends to comply with such order absent further relief from the Court.

10. At the Court's hearing on January 22, 2025, the Trustee's counsel made a surprise request to the Court for expedited discovery to be served on Defendants. There was no previous discovery served in this case.

11. The Court granted the Trustee permission to serve expedited discovery requests on Voizzit Defendants.

12. On or about January 23, 2025, at approximately 4:14 p.m. (ET), counsel for Trustee served the expedited Discovery Requests, a copy of which is attached hereto as Exhibit A, on Voizzit's counsel. The Discovery Requests purport to require responses be completed by January 27, 2025 at 9:00 a.m. (ET) – one full business day after service. The Discovery Requests include Requests for Admission, Interrogatories, Requests for Production, as well as three deposition notices, for depositions to commence on January 27, 2025 at 9:00 a.m.

13. Upon receiving the discovery requests, it was apparent that they were voluminous in view of the expedited schedule for responding and having less than 2 business days to respond.

14. The discovery requests themselves include details beyond the limited scope of the Order to Show Cause, which was limited to the TRO and Preliminary Injunction [Adv. D.I. 14 and 36].

15. For example, it seeks information about Voizzit Defendants' own business and software development. Ex. A, p. 5, RFA no. 6. It seeks discovery on information stricken by this Court, and which Trustee stated was impermissible to be permitted before the Court. Ex. A, p. 6, Interrogatory No. 1. It seeks information about payments from Debtor's processing applications, also beyond the scope of the Order to Show Cause Order. Ex. A, p. 6, Interrogatory No. 8. The Requests for Production seek information relating to the Voizzit Defendants'

business, which is beyond the scope of the present matter. It seeks bank statements for any account that Voizzit Defendants have an interest. The RFPs seek production of all communications between or among the Voizzit Defendants, their agents or representatives, and several Indian entities, and any of their agents. Ex. A, p. 7, Requests for Production Nos. 4, 5. The RFPs seek production of metadata on an email attached to Adv. D.I. 59. These requests are general requests, and not sufficiently specific for expedited discovery. These requests are not reasonable requests for expedited discovery due to their overbreadth and overreaching nature.

16. The discovery requests also contain mistakes, such as the definition of “PI” incorrectly refer to the Preliminary Injunction as Adv. D.I. 20, creating confusion as to the document referenced. Exhibit A: Trustee’s Written Requests to Voizzit Defendants, p. 3, paragraph 8.

17. These requests were addressed to each of the Voizzit Defendants, requiring review and consideration of each request as to each Defendant.

18. A similar set of requests were submitted to Mr. Vellapalath individually, requiring a separate consideration as to Mr. Vellapalath.

19. Notices of Deposition to each of the other Voizzit Defendants was noticed, requesting that each Defendant testify as to the other Voizzit Defendants, which would be objectionable regarding confusing purpose and scope of the information sought. It appears to seek testimony from a party to provide hearsay evidence as to other Defendants. These Notices also continue to incorrectly cite to an incorrect document in the definition of Preliminary Injunction, thus adding confusion and an incorrect record. Exhibit B: Depo. Notices to Voizzit Defendants. These same deposition notices seek overly broad and general information as to

“relationships, transactions, or other connections between any of the Voizzit Defendants and their agents” and a list of other individuals and entities. Ex. B: Depo Notices, paragraph 3.

20. The remainder of the topics of the deposition notices seek general information that is not reasonable nor can be reasonably provided within the expedited discovery schedule – one business day. Ex. B: Depo Notices, paragraphs 4-7.

21. The Order to Show Cause (Adv. D.I. 39) states that the “Voizzit Defendants shall appear in person ... to SHOW CAUSE why they should not be held in civil contempt of Court for their failure to comply with this Court’s TRO.” [Adv. D.I. 14].

22. The Trustee’s Witness and Exhibit List [Adv. D.I. 51] incorrectly refers to the TRO as D.I. 18, creating confusion in the record.

23. Trustee’s Notice of Agenda [Adv. D.I. 52], incorrectly refers to the TRO as D.I. 18, creating confusion in the record.

24. The Trustee’s Notice of Agenda [Adv. D.I. 56] incorrectly refers to the TRO as D.I. 18, creating confusion in the record.

25. Voizzit Defendants have complied with TRO [Adv. D.I. 14], paragraphs 3 and 4, rendering the Order to Show Cause moot.

RELIEF REQUESTED

26. Voizzit respectfully requests that this Court enter an Order striking or limiting the scope of the Document Requests to only those issues in the TRO pertaining to exercising ownership over the Debtors’ assets and transfer of Google Accounts.

BASIS FOR RELIEF

I. Legal Standard Pertaining to Protective Orders

27. Pursuant to Rule 26(c), a person or party, from whom discovery is being sought, may file a motion for protective order. Fed. R. Civ. P. 26(c)(1). The Court has the discretion to grant a request for a protective order. *See Glenmede Trust Co. v. Thompson*, 56 F.3d 476 (3d Cir. 1995). The Court may allow protection from a discovery request by:

(A) forbidding the . . . discovery;

(B) specifying terms, including time and place or the allocation of expenses, for the disclosure or discovery;

(C) prescribing a discovery method other than the one selected by the party seeking discovery; [and]

(D) forbidding inquiry into certain matters, or limiting the scope of disclosure or discovery to certain matters

Fed. R. Civ. P. 26(c)(1)(A)-(D).

28. Rule 26(b)(1) limits the scope of discovery to those matters that are “relevant” to the parties’ claims or defenses. Fed. R. Civ. P. 26(b)(1). Where the discovery sought by a party is irrelevant to the matters to be considered at a hearing or related to a particular motion, such discovery should be quashed. *Tilley v. U.S.*, 270 F. Supp. 2d 731, 734-35 (M.D.N.C. 2003) (“[A] stay of discovery is appropriate if the discovery requested . . . is not relevant to the opposition of the motion If the [. . .] [opposition’s] claims fail as a matter of law, or if the discovery sought has no bearing on an issue of a material fact, a protective order is proper”). *See also Power Integrations, Inc. v. Fairchild Semiconductor Int’l, Inc.*, No. C.A.04-1371 JJF, 2006 WL 2604540, at *3 (D. Del. Aug. 24, 2006) (granting motion for protective order where discovery sought was “irrelevant” and “cumulative”). *Nolan v. Judicial Council of the Third Circuit*, 346 F.

Supp. 500, 502-03 (D. N.J. 1972) (granting protective order where discovery requested was unnecessary to develop facts relevant and material to the question at issue).

29. Additionally, the Court may deny discovery requests intended for an improper purpose, such as to harass, to cause undue burden, or needlessly increase the cost of litigation. *See, e.g., In re Donnelly*, No. 17-03213-CL13, 2018 Bankr. LEXIS 3103, at *11 (Bankr. S.D. Cal. May 18, 2018).

30. “Expedited discovery is not the norm.” *Securities Investor Protection Corp. v. Madoff*, 590 B.R. 200, 207 (Bankr. S.D.N.Y. 2018). [A] party should not ordinarily seek expedited merits discovery” under the Federal Rules of Civil Procedure. *Id.* “[W]hen a plaintiff’s discovery requests would go to the heart of the case, such that they become discovery that seeks to prove an element of the plaintiffs’ case, a request for expedited discovery is inappropriate.” *Id.* (quoting *Attkisson v. Holder*, 113 F.Supp.3d 156, 163 (D.D.C. 2015) (additional citations omitted in original)). The measure of “limited” discovery is essential.

31. Under the *Notaro* standard, the party seeking expedited discovery must demonstrate:

(1) irreparable injury, (2) some probability of success on the merits, (3) some connection between the expedited discovery and the avoidance of the irreparable injury, and (4) some evidence that the injury that will result without expedited discovery looms greater than the injury that the defendant will suffer if the expedited relief is granted. *Notaro v. Koch*, 95 F.R.D. 403, 405 (S.D.N.Y. 1982); (see discussion in *Kone Corp. v. ThyssenKrupp USA, Inc.*, 2011 WL 4478477 (D. Del. Sept. 26, 2011)).

32. The requests must be reasonable in light of the relevant circumstances. *Kone Corp.*, 2011 WL 4478477, *3-4.

II. The Court Should Deny or Limit Discovery Because Trustee Seeks Discovery that is Burdensome, Overbroad and Will Create Undue Burdens and Severe Prejudice to Defendants.

33. The Trustee's discovery requests pose a significant burden on Voizzit as there is insufficient time for full review of requests, discussion between Voizzit and counsel, and proper presentation of responses.

34. In the event Voizzit chooses not to respond, it could lead to an adverse inference in the adversary proceeding, which would be prejudicial to Voizzit.

35. The requests pose a significant burden and severe prejudice to Voizzit to respond without retaining and consulting with white collar defense attorneys, as discovery could lead to a potential criminal proceeding considering the severity of the claims raised in the Complaint of this Adversary Proceeding; such potential serious legal issues require appropriate legal counsel, including criminal defense counsel that can advise Voizzit on Fifth Amendment issues.

36. Voizzit has taken steps to comply with the contempt order, and to show that other parts of the Order are impossible or not enforceable due to lack of its knowledge of the Automatic Stay and other Orders.

III. The Court Should Limit the Expedited Discovery to be Narrowly Tailored to Address the Order to Show Cause, and the TRO [Adv. D.I. 39, 14].

37. The Order to Show Cause relates to Adv. D.I. 14.

38. The Discovery goes beyond the scope of Adv. D.I. 14, and no good cause has been shown by the Trustee for such overbreadth of discovery on an expedited basis.

39. The discovery is general discovery that goes to the claims of the Complaint. It is not properly limited as it should be for expedited discovery.

40. The requests are not reasonable under the circumstances which include (i) the limited time for review and response to the discovery, (2) other deadlines and requirements of

counsel during the same time period for when the responses are to be prepared and served; (iii) new motions filed in the intervening time period by Glas, creating additional deadlines, and hardship to Defendants, (iv) facts and circumstances demonstrate irreparable harm will result to the Defendants without a Protective Order.

IV. The Court Should Deny or Limit Discovery Because the Document Requests are Unduly Burdensome and undermine the core procedural mechanism of discovery. Responding to the Discovery Will Create Irreparable Harms and Deprive Defendants of the time afford by the Discovery Rules for Responding, including Time for Consulting with Appropriate Legal Counsel.

41. Voizzit is working diligently to comply with Court Orders. The allegations raised against Voizzit must cease. Plaintiff's allegations create a false pretense that each and every action it takes are in bad faith. The allegations are unfounded, and the expedited course of these proceedings have resulted in severe prejudice and extraordinary circumstances violating Voizzit's due process rights, and right to be heard in court.

42. Voizzit has retained local counsel, as ordered.

43. Voizzit has demonstrated that it cannot comply with the Court Orders due to impossibility. Voizzit has demonstrated good faith compliance before this Court.

44. Voizzit recognized the complexities of this case and requested 30 days [Adv. D.I. 59] in order to have appropriate legal counsel and time to review the very detailed and complex facts of this matter.

45. Upon reviewing the discovery requests, Voizzit has determined that it needs legal counsel to advise on the potential for any statements, testimony or evidence to be used against Voizzit and its principals in a criminal proceeding. Voizzit maintains that the current posture of the proceeding is largely due to the Plaintiff's serial motions to shorten time, and motions to strike Voizzit's briefing.

46. It will be severely prejudicial to Voizzit to not have appropriate time for its counsel to review this fact-intensive, document heavy case, and to advise appropriately. See *Meridian Fin. Advisors, Ltd. v. Contract Purchase & Design Inc. (In re Shubh Hotels Pittsburgh, LLC)*, 495 B.R. 274, footnote 4 (Bankr. W.D. Pa. 2013).

47. If discovery is not stayed or an order of protection not granted it will result in distortion of the facts in the case and will fundamentally undermine the core procedural mechanisms of discovery. To avoid any distorted outcome, Voizzit requests stay on discovery or an order of protection that will vindicate public interest for the courts to ensure that the proceedings encompass fairness in the enforcement of the bankruptcy laws.

48. Additionally, the Court may deny discovery requests intended for an improper purpose, such as to harass, to cause undue burden, or needlessly increase the cost of litigation. See, e.g., *In re Donnelly*, No. 17-03213-CL13, 2018 Bankr. LEXIS 3103, at *11 (Bankr. S.D. Cal. May 18, 2018). Further, the Document Requests improperly set a response deadline of less than two (2) business days from date of service.

49. Accordingly, a protective order should be entered to prevent the Trustee from taking the requested discovery. In the alternative, the Court should issue a protective order limiting the issues and prohibiting Trustee from taking discovery on any issues irrelevant to the legal arguments raised in the Objection, and/or for those requests where Voizzit requires time to retain and consult with additional defense counsel.

50. The request for protective order poses no prejudice to the Trustee, or to the Debtors' creditors. Voizzit has been diligent in securing counsel for this case, and will continue to work expeditiously to rectify the false allegations against them, and set the record straight.

CERTIFICATION OF COUNSEL

51. The undersigned certifies that a reasonable effort was made to reach agreement with counsel to Trustee on the matters set forth in this motion and no resolution was reached prior to the filing hereof. A call with Trustee's counsel was held on Friday, January 24, 2025 at 8:30 p.m.

CONCLUSION

For the reasons set forth above, Voizzit respectfully requests that the Court strike the requests that are beyond the subject matter of the TRO, and/or which are shown through Defendants' Response to OTSC to be moot, and grant such other and further relief as the Court deems just and proper.

Dated: January 27, 2025

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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Counsel to Defendants Voizzit Technology Private Ltd., Voizzit Information Technology LLC and Rajendran Vellapalathe

Exhibit A

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

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

**TRUSTEE’S FIRST SET OF REQUESTS FOR
ADMISSION, INTERROGATORIES AND DOCUMENT
REQUESTS TO VINAY RAVINDRA**

Claudia Z. Springer, not individually but solely as chapter 11 trustee (the “Trustee”) of Epic! Creations, Inc. (“Epic”); Neuron Fuel, Inc. (“Neuron Fuel”); and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), by and through her attorneys, serves this First Set of Requests for Admission, Interrogatories, and document requests to Vinay Ravindra in relation to the hearing on the Court’s Order to Show Cause [Adv. D.I. 39], and requests that the Defendant

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).

serve written responses to this discovery to the offices of Jenner & Block LLP, 353 North Clark Street, Chicago, Illinois 60654, attn: Catherine Steege and Melissa Root, by no later than Monday, January 27, 2025 at 9:00 a.m. E.T., pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (the “Federal Rules”), as made applicable in this adversary proceeding by Rules 7026 and 7036 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Court’s Order allowing for expedited discovery.

DEFINITIONS

1. “Apple Funds” means the \$1,049,044 transferred from Epic’s Apple Account and the \$14,719.74 transferred from Tangible Play’s Apple Account to the Voizzit UAE bank account at Emirates Islamic Bank in Dubai on or around October 3, 2024.

2. “Debtor” means each of Epic! Creations, Inc., Tangible Play, Inc., and Neuron Fuel, Inc.

3. “Each” means each, every, and any.

4. “Including” means “including, but not limited to,” and “includes” means “includes, but is not limited to.”

5. “India Lawsuit” means the proceeding entitled *Voizzit Technology Pvt. Ltd. et al. v. Think & Learn Pvt Ltd et al.*, C.S. No. 118 of 2024 pending before the Honourable Commercial Court at Ernakulam in India and attached to the Trustee’s complaint in the adversary proceeding *Springer v. Voizzit Technology Private Ltd et al*, Adv. 24-50280 [D.I. 1].

6. “Person” means any natural person or any legal entity, including, without limitation, any business or government entity or association.

7. “Referring to,” “relating to,” “regarding,” and “concerning” mean anything that, directly or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any way, is or was used in the

preparation of, is appended to, is legally, logically, or factually connected with, proves, disproves, or tends to prove or disprove, the subject of the demands.

8. “TRO” means the *Order Granting Chapter 11 Trustee’s Motion For A Temporary Injunction* [Adv. D.I. 14] entered in the above-referenced adversary proceeding on November 19, 2024.

9. “PI” means the *Order Granting Chapter 11 Trustee’s Motion for Entry of a Preliminary Injunction* [Adv. D.I. 20] entered in the above captioned adversary proceeding on December 18, 2024.

10. The terms “You” and “Your” refer to each Defendant (as defined above) and each of their respective affiliates, agents, attorneys, employees, representatives, and others within their respective control.

11. The terms “and” and “or” shall be read in the disjunctive, conjunctive, or both, consistent with an interpretation that results in the broadest disclosure of information.

12. The terms “any” and “all” shall each be construed to mean “any and all,” so as to require the broadest meaning possible.

13. The singular shall be read to include the plural, and the plural the singular, consistent with an interpretation that results in the broadest disclosure of information.

14. A reference to a party in these Requests means the party and, where applicable, its officers, directors, employers, partners, corporate parent, subsidiaries, or affiliates.

15. “Voizzitt Defendants” means Voizzit Technology Private Ltd., Voizzit Information Technology LLC, and/or Rajendran Vellapalath.

INSTRUCTIONS

1. You are to provide full and complete responses to the following Requests, after conducting a diligent and thorough investigation into all information within Your possession, custody, or control. If You cannot provide a full and complete response to any Request, You should respond to the Request to the extent possible, specifying the portion of the Request You are unable to answer and providing any information You have regarding the unanswered portion.

2. A denial must fairly meet the substance of the Request, and when good faith requires that You qualify Your answer or deny only a part of the matter of which admission is requested, You must specify so much of it as is true and qualify or deny the remainder. You may not give lack of information or knowledge as the reason for failure to admit or deny unless You state that You have made reasonable inquiry and that the information known or readily obtainable by You is insufficient to enable You to admit or deny.

3. If You consider that a matter of which an admission has been requested presents a genuine issue for trial, You may not, on that ground alone, object to the Request.

4. If, in answering the Requests, privilege or immunity is alleged as to information or documents, or if a Request is otherwise not answered in full, You shall state the specific grounds for not answering in full, identify with specificity all information or documents for which privilege or immunity is claimed, and respond to the request to the extent it is not objected to. These Requests shall include information acquired or identified up to the date that You respond to them and shall be deemed to be continuing. You shall promptly supplement these requests to reflect any additional information that You identify, acquire, or become aware of up to and including the time of trial.

REQUESTS FOR ADMISSION

1. Admit that You received the TRO on November 19, 2024.

INTERROGATORIES

1. Identify all “accounts, assets, email extensions, projects, entity names, [and] 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,” as referenced in Paragraph 3 of the TRO.

2. Identify all of the steps You have taken, or anyone on Your behalf has taken, to answer the preceding Interrogatory No. 1.

3. Identify all of “the Debtors’ applications, data, project, funds, or any other information or property of the Debtors,” as referenced in Paragraph 5 of the TRO, that You have received on or after June 5, 2024.

4. Identify all of the steps You have taken, or anyone on Your behalf has taken, to answer the preceding Interrogatory No. 3.

5. For any Request for Admission for which You did not provide an unqualified admission, state the basis for denial or qualified admission.

DOCUMENT REQUESTS

1. All Communications between or among You and Your agents or representatives, on the one hand, and Think & Learn, Pankaj Srivastava, Byju Raveendran, Riju Ravindran,

Rajendran Vellapalath, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, or any of their agents or representatives, on the other hand, concerning these Chapter 11 Cases.

2. All of Your bank statements on or after November 19, 2024.

3. All submissions and other requests that have been made on or after July 16, 2024

for You to obtain a visa to enter the United States of America and all responses thereto.

Wilmington, Delaware
January 23, 2025

/s/ Joseph C. Barsalona II

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

Joseph C. Barsalona II
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Wilmington, DE 07601
Telephone: (302) 592-6497
jbarsalona@pashmanstein.com

-and-

JENNER & BLOCK LLP

Catherine Steege (admitted *pro hac vice*)
Melissa Root (admitted *pro hac vice*)
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Counsel to the Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , ¹	Case No. 24-11161 (JTD)
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**TRUSTEE’S FIRST SET OF REQUESTS FOR ADMISSION,
INTERROGATORIES AND DOCUMENT REQUESTS TO
RAJENDRAN VELLAPALATH, VOIZZIT TECHNOLOGY
PRIVATE LTD., AND VOIZZIT INFORMATION TECHNOLOGY LLC**

Claudia Z. Springer, not individually but solely as chapter 11 trustee (the “Trustee”) of Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), by and through her attorneys, serves this First Set of Requests for Admission, Interrogatories and Document Requests to Rajendran Vellapalath,

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Voizzit Technology Private Ltd., and Voizzit Information Technology LLC in relation to the hearing on the Court’s Order to Show Cause [Adv. D.I. 39], and requests that each of the above-named Defendants serve written responses to this discovery to the offices of Jenner & Block LLP, 353 North Clark Street, Chicago, Illinois 60654, attn: Catherine Steege and Melissa Root, by no later than Monday, January 27, 2025 at 9:00 a.m. ET, pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (the “Federal Rules”), as made applicable in this adversary proceeding by Rules 7026 and 7036 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Court’s Order allowing for expedited discovery.

DEFINITIONS

1. “Apple Funds” means the \$1,049,044 transferred from Epic’s Apple Account and the \$14,719.74 transferred from Tangible Play’s Apple Account to the Voizzit UAE bank account at Emirates Islamic Bank in Dubai on or around October 3, 2024.
2. “Debtor” means each of Epic! Creations, Inc., Tangible Play, Inc., and Neuron Fuel, Inc.
3. “Each” means each, every, and any.
4. “Including” means “including, but not limited to,” and “includes” means “includes, but is not limited to.”
5. “India Lawsuit” means the proceeding entitled *Voizzit Technology Pvt. Ltd. et al. v. Think & Learn Pvt Ltd et al.*, C.S. No. 118 of 2024 pending before the Honourable Commercial Court at Ernakulam in India and attached to the Trustee’s complaint in the adversary proceeding *Springer v. Voizzit Technology Private Ltd et al*, Adv. 24-50280 [D.I. 1].
6. “Person” means any natural person or any legal entity, including, without limitation, any business or government entity or association.

7. “Referring to,” “relating to,” “regarding,” and “concerning” mean anything that, directly or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any way, is or was used in the preparation of, is appended to, is legally, logically, or factually connected with, proves, disproves, or tends to prove or disprove, the subject of the demands.

8. “TRO” means the *Order Granting Chapter 11 Trustee’s Motion For A Temporary Injunction* [Adv. D.I. 14] entered in the above-referenced adversary proceeding on November 19, 2024.

9. “PI” means the *Order Granting Chapter 11 Trustee’s Motion for Entry of a Preliminary Injunction* [Adv. D.I. 20] entered in the above captioned adversary proceeding on December 18, 2024.

10. The terms “You” and “Your” refer to each Defendant and each of their respective affiliates, agents, attorneys, employees, representatives, and others within their respective control.

11. The terms “and” and “or” shall be read in the disjunctive, conjunctive, or both, consistent with an interpretation that results in the broadest disclosure of information.

12. The terms “any” and “all” shall each be construed to mean “any and all,” so as to require the broadest meaning possible.

13. The singular shall be read to include the plural, and the plural the singular, consistent with an interpretation that results in the broadest disclosure of information.

14. A reference to a party in these Requests means the party and, where applicable, its officers, directors, employers, partners, corporate parent, subsidiaries, or affiliates.

INSTRUCTIONS

1. You are to provide full and complete responses to the following Requests, after conducting a diligent and thorough investigation into all information within Your possession, custody, or control. If You cannot provide a full and complete response to any Request, You should respond to the Request to the extent possible, specifying the portion of the Request You are unable to answer and providing any information You have regarding the unanswered portion.

2. A denial must fairly meet the substance of the Request, and when good faith requires that You qualify Your answer or deny only a part of the matter of which admission is requested, You must specify so much of it as is true and qualify or deny the remainder. You may not give lack of information or knowledge as the reason for failure to admit or deny unless You state that You have made reasonable inquiry and that the information known or readily obtainable by You is insufficient to enable You to admit or deny.

3. If You consider that a matter of which an admission has been requested presents a genuine issue for trial, You may not, on that ground alone, object to the Request.

4. If, in answering the Requests, privilege or immunity is alleged as to information or documents, or if a Request is otherwise not answered in full, You shall state the specific grounds for not answering in full, identify with specificity all information or documents for which privilege or immunity is claimed, and respond to the request to the extent it is not objected to. These Requests shall include information acquired or identified up to the date that You respond to them and shall be deemed to be continuing. You shall promptly supplement these requests to reflect any additional information that You identify, acquire, or become aware of up to and including the time of trial.

REQUESTS FOR ADMISSION

1. Admit that Voizzit Information Technology LLC has not returned the Apple Funds to the Trustee.
2. Admit that You have not dismissed the India Lawsuit.
3. Admit that You did not provide the Trustee with the information mandated by paragraph 3 of the TRO by November 22, 2024.
4. Admit that You did not at any time facilitate the transfer of the email extensions, projects, entity names, or other credentials to the Trustee mandated by paragraph 3 of the TRO.
5. Admit that You never took any actions to return to the Trustee the source code repositories transferred from the Debtors' GitHub accounts to the edunest-tp and edunest-tp accounts.
6. Admit that the edunest website is designed and developed by Voizzit Information Technology LLC.
7. Admit that You never took any actions to return to the Trustee the "playosmo.com" domain transferred from Tangible Play's Cloudflare account.
8. Admit that You have not delivered to the Trustee data relating to the amount of time customers spent viewing specific content within the application(s) for the time period when You controlled the Google accounts.
9. Admit that Voizzit Information Technology LLC never complied with paragraph 5 of the TRO by transferring to the Trustee "the Debtors' applications, data, project, funds, or any other information or property of the Debtors[.]"

INTERROGATORIES

1. Identify each employee by name, address, and employer and the amount received that Defendant Vellapalath was referring to in the following statement he made in a declaration he filed with the Court at D.I. 25:

Despite Voizzit's compliance with the Stay Order and the TRO in every other meaningful fashion, Voizzit has been unable to return the funds under the Stay Order at this time as we have been spending approximately \$1.3 million dollars per month for employees and other expenses to keep the platform running until November 12, 2024. In fact, the full \$1,063,763.74 that Voizzit was required to turn over, has been used to pay employees and for the maintenance of the Debtors' assets.

2. Identify the "other expenses" that Defendant Vellapalath referenced in the quote from his declaration found at D.I. 25, including the entity or person paid, the type of expense, the amount paid, and the date of payment.

3. Identify the date on which You first received the TRO.

4. Identify the date on which You first received the PI.

5. Identify all laws or regulations of the United Arab Emirates that You contend prevent You from complying with the TRO.

6. Identify all laws or regulations of the Republic of India that You contend prevented You from complying with the TRO.

7. Identify all steps, if any, You have taken to withdraw or dismiss the India Complaint.

8. Identify all amounts You have received from any of the Debtors' payment processing applications or accounts at any time from June 4, 2024 through the present, including the amount received, the processing system or account from which the amount was received, the

date of the receipt and the account number and financial institution into which the amount was deposited.

9. For any Request for Admission for which You did not provide an unqualified admission, state the basis for denial or qualified admission.

DOCUMENT REQUESTS

1. All documents related to the transfer or expenditure of the Apple Funds.

2. All communications You have had with any person related to the TRO.

3. All communications You have had with any person related to the PI.

4. All bank statements any bank account in which You have an interest, including but not limited to the Voizzit UAE bank account at Emirates Islamic Bank in Dubai into which the Apple Funds were deposited, for the time period from June 2024 through the present.

5. All communications between or among You and Your agents or representatives, on the one hand, and Think & Learn, Pankaj Srivastava, Byju Raveendran, Riju Ravindran, Vinay Ravindra, or any of their agents or representatives, on the other hand, concerning these Chapter 11 Cases.

6. All meta data for the email attached as Exhibit 6 to Defendant Vellapalath's Declaration filed on January 21, 2025 in the above-captioned adversary, and the attachments to Exhibit 6, and any response to such email, including any bounce-backs.

7. The most recent financial statements for Voizzit Technology Private Ltd., and Voizzit Information Technology LLC.

Wilmington, Delaware
January 23, 2025

/s/ Joseph C. Barsalona II

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

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Counsel to the Trustee

Exhibit B

**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, and Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered)

**NOTICE OF DEPOSITION OF RULE 30(b)(6) REPRESENTATIVE(S)
OF VOIZZIT TECHNOLOGY PRIVATE LTD. IN RELATION TO
ORDER OF CONTEMPT AGAINST DEFENDANTS VOIZZIT TECHNOLOGY
PRIVATE LTD, VOIZZIT INFORMATION TECHNOLOGY LLC,
VINAY RAVINDRA AND RAJENDRAN VELLAPALATH**

PLEASE TAKE NOTICE THAT, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, as made applicable to these cases by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, Chapter 11 Trustee Claudia Z. Springer, through her undersigned counsel, will take the deposition upon oral examination of one or more persons designated by Voizzit Technology Private Ltd. to testify on its behalf with regard to the matters set forth in **Exhibit A**.

PLEASE TAKE FURTHER NOTICE THAT the deposition will take place on **Monday, January 27, 2025 at 9:00 a.m. (prevailing Eastern time)** via a Zoom videoconference, accessible as follows:

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).

Meeting ID: 312 923 2952
Password: 894688

and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. The deposition shall continue from day to day until it has been completed.

Wilmington, Delaware
January 23, 2025

/s/ Joseph C. Barsalona II

PASHMAN STEIN WALDER HAYDEN, P.C.

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wwilliams@jenner.com

Counsel to the Trustee

EXHIBIT A

DEFINITIONS

A. “Apple Funds” means the \$1,049,044 transferred from Epic’s Apple Account and the \$14,719.74 transferred from Tangible Play’s Apple Account to the Voizzit Information Technology LLC bank account at Emirates Islamic Bank in Dubai on or around October 3, 2024.

B. “Debtor” means each of Epic! Creations, Inc., Tangible Play, Inc., and Neuron Fuel, Inc.

C. “India Lawsuit” means the proceeding entitled *Voizzit Technology Pvt. Ltd. et al. v. Think & Learn Pvt Ltd et al.*, C.S. No. 118 of 2024 pending before the Honourable Commercial Court at Ernakulam in India and attached to the Trustee’s complaint in the adversary proceeding *Springer v. Voizzit Technology Private Ltd et al*, Adv. 24-50280 [D.I. 1].

D. “TRO” means the *Order Granting Chapter 11 Trustee’s Motion For A Temporary Injunction* [Adv. D.I. 14] entered in the above-referenced adversary proceeding on November 19, 2024.

E. “PI” means the *Order Granting Chapter 11 Trustee’s Motion for Entry of a Preliminary Injunction* [Adv. D.I. 20] entered in the above captioned adversary proceeding on December 18, 2024.

F. “Voizzit Defendants” means Voizzit Technology Private Ltd., and Voizzit Information Technology LLC.

DEPOSITION TOPICS

The person(s) designated by Voizzit Information Technology LLC shall testify as to any fact and/or matter raised or relating to:

- 1) The Voizzit Defendants’ compliance or non-compliance with the TRO.
- 2) The Voizzit Defendants’ compliance or non-compliance with the PI.

3) Any relationships, transactions, or other connections between any of the Voizzit Defendants and their agents, on the one hand, and Think & Learn, Pankaj Srivastava, Byju Raveendran, Riju Ravindran, Vinay Ravindra, or any of their agents or representatives, on the other hand, concerning these chapter 11 cases.

4) The Voizzit Defendants taking of assets of any of the Debtors, including the taking of the Apple Funds.

5) The Voizzit Defendants' financials.

6) The Voizzit Defendants' collection and production of documents in response to the Trustee's first set of requests for production.

7) The Voizzit Defendants' responses to the Trustee's first set of interrogatories and the investigation undertaken by the Voizzit Respondents in connection therewith.

**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, and Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered)

**NOTICE OF DEPOSITION OF RAJENDRAN VELLAPALATH IN RELATION TO
ORDER OF CONTEMPT AGAINST DEFENDANTS VOIZZIT TECHNOLOGY
PRIVATE LTD, VOIZZIT INFORMATION TECHNOLOGY LLC,
VINAY RAVINDRA AND RAJENDRAN VELLAPALATH**

PLEASE TAKE NOTICE THAT, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rule 30 of the Federal Rules of Civil Procedure, as made applicable to these cases by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, Chapter 11 Trustee Claudia Z. Springer, through her undersigned counsel, will take the deposition upon oral examination of Rajendran Vellapalath on **January 27, 2025 at 9:00 a.m. (prevailing Eastern time)**.

The deposition will take place via a Zoom videoconference, accessible as follows:

Meeting ID: 312 840 7255
Password: 224234

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

and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. The deposition shall continue from day to day until it has been completed.

Wilmington, Delaware
January 23, 2025

/s/ Joseph C. Barsalona II

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Counsel to the Trustee

**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, and Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered)

**NOTICE OF DEPOSITION OF RULE 30(b)(6) REPRESENTATIVE(S)
OF VOIZZIT INFORMATION TECHNOLOGY LLC IN RELATION TO
ORDER OF CONTEMPT AGAINST DEFENDANTS VOIZZIT TECHNOLOGY
PRIVATE LTD, VOIZZIT INFORMATION TECHNOLOGY LLC,
VINAY RAVINDRA AND RAJENDRAN VELLAPALATH**

PLEASE TAKE NOTICE THAT, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, as made applicable to these cases by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, Chapter 11 Trustee Claudia Z. Springer, through her undersigned counsel, will take the deposition upon oral examination of one or more persons designated by Voizzit Information Technology LLC to testify on its behalf with regard to the matters set forth in **Exhibit A**.

PLEASE TAKE FURTHER NOTICE THAT the deposition will take place on **Monday, January 27, 2025 at 9:00 a.m. (prevailing Eastern time)** via a Zoom videoconference, accessible as follows:

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).

Meeting ID: 312 923 2952
Password: 894688

and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. The deposition shall continue from day to day until it has been completed.

Wilmington, Delaware
January 23, 2025

/s/ Joseph C. Barsalona II

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Counsel to the Trustee

EXHIBIT A

DEFINITIONS

A. “Apple Funds” means the \$1,049,044 transferred from Epic’s Apple Account and the \$14,719.74 transferred from Tangible Play’s Apple Account to the Voizzit Information Technology LLC bank account at Emirates Islamic Bank in Dubai on or around October 3, 2024.

B. “Debtor” means each of Epic! Creations, Inc., Tangible Play, Inc., and Neuron Fuel, Inc.

C. “India Lawsuit” means the proceeding entitled *Voizzit Technology Pvt. Ltd. et al. v. Think & Learn Pvt Ltd et al.*, C.S. No. 118 of 2024 pending before the Honourable Commercial Court at Ernakulam in India and attached to the Trustee’s complaint in the adversary proceeding *Springer v. Voizzit Technology Private Ltd et al*, Adv. 24-50280 [D.I. 1].

D. “TRO” means the *Order Granting Chapter 11 Trustee’s Motion For A Temporary Injunction* [Adv. D.I. 14] entered in the above-referenced adversary proceeding on November 19, 2024.

E. “PI” means the *Order Granting Chapter 11 Trustee’s Motion for Entry of a Preliminary Injunction* [Adv. D.I. 20] entered in the above captioned adversary proceeding on December 18, 2024.

F. “Voizzit Defendants” means Voizzit Technology Private Ltd., and Voizzit Information Technology LLC.

DEPOSITION TOPICS

The person(s) designated by Voizzit Information Technology LLC shall testify as to any fact and/or matter raised or relating to:

- 1) The Voizzit Defendants’ compliance or non-compliance with the TRO.
- 2) The Voizzit Defendants’ compliance or non-compliance with the PI.

3) Any relationships, transactions, or other connections between any of the Voizzit Defendants and their agents, on the one hand, and Think & Learn, Pankaj Srivastava, Byju Raveendran, Riju Ravindran, Vinay Ravindra, or any of their agents or representatives, on the other hand, concerning these chapter 11 cases.

4) The Voizzit Defendants taking of assets of any of the Debtors, including the taking of the Apple Funds.

5) The Voizzit Defendants' financials.

6) The Voizzit Defendants' collection and production of documents in response to the Trustee's first set of requests for production.

7) The Voizzit Defendants' responses to the Trustee's first set of interrogatories and the investigation undertaken by the Voizzit Respondents in connection therewith.

**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)

**ORDER GRANTING VOIZZIT INFORMATION TECHNOLOGY LLC, VOIZZIT
TECHNOLOGY PRIVATE LIMITED, VINAY RAVINDRA AND RAJENDRAN
VELLAPALATH’S MOTION FOR PROTECTIVE ORDER**

Upon the motion (the “Motion”)² of Voizzit Information Technology LLC, Voizzit Technology Private Limited, and Rajendran Vellapalath, for entry of a protective order (this “Order”) either striking or limited the Trustee’s expedited discovery requests; and the Court having reviewed and considered the Motion, all relief related thereto, any objections thereto and statements of counsel and the evidence presented in support of the relief requested in the Motion;

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 defined in this Order are used as defined in the Motion.

and adequate and sufficient notice of the Motion was given; and it further appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Trustee's discovery requests served upon Voizzit Information Technology LLC, Voizzit Technology Private Limited, and Rajendran Vellapalath are hereby stricken.