

**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. 14, 18 & 39

**CHAPTER 11 TRUSTEE'S AMENDED WITNESS AND EXHIBIT
LIST FOR HEARING ON JANUARY 29, 2025 AT 1:00 P.M. (ET)**

Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the Estates of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. (the “Debtors”) in the above-captioned chapter 11 cases (these “Chapter 11 Cases”) submits this amended witness and exhibit list in connection with the continued hearing scheduled for **January 29, 2025, at 1:00 p.m. (ET)**, before the Honorable Brendan L. Shannon, at the United States Bankruptcy Court for the District of Delaware (the “Hearing”), at which time Defendants Voizzit Technology Private Ltd,

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).



Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath (the “Voizzit Defendants”), are required to appear in person and show cause as to why the Voizzit Defendants should not be held in civil contempt of Court for their failure to comply with this Court’s temporary restraining order issued on November 19, 2024 [Adv. D.I. 14] as requested by the Trustee in her *Emergency Motion to Hold the Voizzit Defendants in Contempt of Court for their Failure to Comply with the Courts November 19 Order* [Adv. D.I. 18] (the “Contempt Motion”). See *Order to Show Cause* [Adv. D.I. 39] (the “OTSC”).

WITNESSES

The Trustee may call the following witnesses at the hearing:

Name	Synopsis of Anticipated Testimony
Claudia Z. Springer Trustee Novo Advisors, LLC 401 N. Franklin Street, Suite, 4 East Chicago, Illinois 60654	The Trustee will offer testimony through the <i>Amended 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> she submitted at Adv. D.I. 76. The Trustee will be physically present in the courtroom and available for cross examination and redirect, if necessary.

Name	Synopsis of Anticipated Testimony
Melissa Root, Esq. Jenner and Block LLP 353 N. Clark Street Chicago, IL 60654-3456	The Trustee will offer testimony through the <i>Declaration of Melissa M. Root in Support of an Order of Contempt Against Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra and Rajendran Vellapalth</i> she submitted at Adv. D.I. 77. Ms. Root will be physically present in the courtroom and available for cross examination and redirect, if necessary.
Jacob Grall Novo Advisors, LLC 401 N. Franklin Street, Suite, 4 East Chicago, Illinois 60654	The Trustee will offer testimony through the <i>Declaration of Jacob Grall in Support of an Order of Contempt Against Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra and Rajendran Vellapalth</i> she submitted at Adv. D.I. 18-4. Mr. Grall will be physically present in the courtroom and available for cross examination and redirect, if necessary.
Any witness called by GLAS Trust Company LLC	
Any witness called by the Voizzit Defendants	

The Trustee reserves the right to supplement this witness list and to cross-examine any witness called by any other party. The Trustee also reserves the right to call any witness, including any rebuttal witness, identified in any other party's witness list and she further reserves the right to call any witness to rebut any testimony offered by the Defendants.

EXHIBITS

The Trustee reserves her right to object to the entry into evidence of any exhibit. The Trustee also reserves her right to amend, shorten, or supplement this witness and exhibit list prior to the Hearing. The Trustee reserves the right to offer any exhibit contained on any other party's exhibit list.

In addition, the Trustee designates the following exhibits that may be used at the Hearing in connection with the Contempt Motion:

Exhibit No.	Document Description	Adv. D.I.
1	<i>Amended 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 Vellapalth</i>	76
2	Email with Google's counsel dated November 20, 2024	76-1, Ex. A
3	Email with Google's counsel dated December 6, 2024	76-2, Ex. B
4	Email with Google's counsel dated December 9, 2024	76-3, Ex. C
5	Email dated January 10, 2025 regarding withdrawal of Indian lawsuit and request for service of all supporting documents	76-4, Ex. D
6	Composite time and fee entries regarding failure to comply with TRO and PI (both defined below)	76-5, Ex. E
7	Order Granting Chapter 11 Trustees Motion for a Temporary Injunction (the " <u>TRO</u> ")	14
8	Certificate of Service (serving the TRO)	17
9	Order Granting Chapter 11 Trustees Motion for Preliminary Injunction (the " <u>PI</u> ")	36
10	Certificate of Service (serving the PI)	42
11	Certificate of Service (serving the OTSC)	43
12	Certificate of Service (serving the Notice of Rescheduled Hearing re: OTSC)	48

Exhibit No.	Document Description	Adv. D.I.
13	11/19/2024 Transcript	Main Case D.I. 323
14	12/03/2024 Transcript	Main Case D.I. 366
15	<i>Declaration of Jacob Grall in Support of an Order of Contempt Against Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra and Rajendran Vellapalth</i>	18-4
16	<i>Declaration of Melissa M. Root in Support of an Order of Contempt Against Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra and Rajendran Vellapalth</i>	77
17	11/12/2024 Transcript	77-1, Ex. A
18	W. Williams November 12 Email and Discovery to Voizzit Counsel	77-2, Ex. B
19	C. Steege November 15 Email to Voizzit Counsel	77-3, Ex. C
20	C. Samis November 15 Email to C. Steege and M. Root	77-4, Ex. D
21	N. Mozal November 15 Email to C. Steege and M. Root	77-5, Ex. E
22	C. Steege November 17 Email to C. Samis and N. Mozal	77-6, Ex. F
23	N. Mozal November 18 Email to C. Steege and M. Root	77-7, Ex. G
24	M. Root November 18 Email to C. Samis and N. Mozal	77-8, Ex. H
25	M. Root November 18 Service of TRO Filings Email to C. Samis and N. Mozal	77-9, Ex. I
26	11/19/2024 Transcript	77-10, Ex. J
27	M. Root November 19 Email to C. Samis and N. Mozal	77-11, Ex. K
28	11/19/24 Certificate of Counsel Submitting TRO	77-12, Ex. L
29	M. Root November 19 Service of TRO Email to C. Samis	77-13, Ex. M
30	11/21/2024 Transcript	77-14, Ex. N
31	Sign-In Sheet for Hearing on November 21, 2024	77-15, Ex. O

Exhibit No.	Document Description	Adv. D.I.
32	January 22, 2025 Email from M. Scorese	77-16, Ex. P
33	January 23, 2025 Email to M. Scorese re service of discovery requests	77-17, Ex. Q
34	January 24, 2025 Email to M. Scorese re requesting meet and confer for discovery requests	77-18, Ex. R
35	January 26, 2025 Emails from M. Scorese re not producing written responses to discovery requests	77-19, Ex. S
36	India Complaint and motions for injunctive relief	N/A
37	ECF Notice of TRO	N/A

Dated: January 27, 2025
Wilmington, Delaware

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

/s/ Alexis R. Gambale

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-and-

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