

**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.

Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath

Defendants.

Adv. Pro. No. 24-50233 (JTD)

(Jointly Administered)

**Re. Adv. D.I. Nos. 2, 3, 4, 14, 18, 36, 39, 80 & 85**

**MOTION FOR LEAVE TO EXCEED PAGE LIMIT WITH RESPECT  
TO THE TRUSTEE'S REPLY IN SUPPORT OF CHAPTER 11 TRUSTEE'S REQUEST  
FOR CIVIL SANCTIONS PURSUANT TO THE COURT'S ORDER TO SHOW CAUSE**

Plaintiff Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the Estates of Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, the “Debtors”), respectfully file this motion (the “Motion to Exceed”) seeking entry of an order, substantially in the form attached hereto as Exhibit A, authorizing the Trustee to exceed certain page limits as set forth in Rule 7007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (“Local Rules”). Specifically, the Trustee seeks to exceed the fifteen

<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).



(15) page limit under Local Rule 7007-2 for the *Reply in Support Reply in Support of Chapter 11 Trustee's Request for Civil Sanctions Pursuant to the Court's Order to Show Cause* [Adv. D.I. 85] (the "Reply").<sup>2</sup> In support of the relief requested in this Motion to Exceed, the Trustee respectfully states as follows:

### **JURISDICTION**

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 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. The bases for the relief requested in this Motion to Exceed are Local Rules 1001-1 and 7007-2 and such other and further provisions of the Local Rules and Chambers Procedures as may apply.

3. Pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 9013-1(f) of the Local Rules, the Trustee confirms her consent to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

### **RELIEF REQUESTED**

4. By this Motion to Exceed, the Trustee requests authority to file a 16-page Reply.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Reply.

**BASIS FOR RELIEF**

5. The Local Rule 7007-2(a)(iv) provides that “[w]ithout leave of Court... no reply shall exceed fifteen (15) pages ... exclusive of any tables of contents and citations...” Del. Bankr. LR 7007-2(a)(iv). Local Rule 1001-l(c) provides that “[t]he application of these Local Rules in any case or proceeding may be modified by this Court in the interest of justice.” Del. Bankr. LR 1001-l(c).

6. Due to the numerous factual inconsistencies and legal issues addressed in *Voizzit Information Technology LLC, Voizzit Technology Private Limited and Rajendran Vellapalath’s Response to Order to Show Cause and Motion to Dismiss the Complaint* [Adv. D.I. 80] (the “Response”) as well as the complexity of the circumstances, the Trustee respectfully requests leave from any page limitations that may apply.

7. Moreover, there is no prejudice to other parties as the Trustee is seeking a de minimis (one (1) page) deviation from the Local Rule.

**WHEREFORE**, for the reasons set forth above, the Trustee respectfully requests that this Court enter an order authorizing it to exceed the fifteen (15) page limit under Local Rule with respect to the Reply for Motion for Leave by an additional one (1) page and granting such other and further relief as this Court may deem just and proper under the circumstances.

*[intentionally left blank]*

Dated: January 28, 2025  
Wilmington, Delaware

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

/s/ Alexis R. Gambale

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**EXHIBIT A**

**PROPOSED ORDER**

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

In re:

EPIC! CREATIONS, INC., *et al.*,<sup>1</sup>

Debtors.

## Chapter 11

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Claudia Z. Springer, Chapter 11 Trustee,

Plaintiff,

Adv. Pro. No. 24-50233 (JTD)

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Google LLC, Voizzit Technology Private  
Ltd., Voizzit Information Technology LLC,  
Vinay Ravindra, and Rajendran Vellapalath

Defendants.

**Re. Adv. D.I. Nos. 2, 3, 4, 14, 18, 36, 39, 80 & 85**

**ORDER GRANTING MOTION FOR LEAVE TO EXCEED PAGE LIMIT WITH  
RESPECT TO THE TRUSTEE’S REPLY IN SUPPORT OF  
CHAPTER 11 TRUSTEE’S REQUEST FOR CIVIL SANCTIONS  
PURSUANT TO THE COURT’S ORDER TO SHOW CAUSE**

Upon the motion (“Motion to Exceed”) of Plaintiff Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the Estates of Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, the “Debtors”), for entry of an order, pursuant to Rules 1001-1 and 7007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (“Local Rules”), to exceed the fifteen (15) page limit under Local Rule

<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).

*7007-2 for Reply in Support Reply in Support of Chapter 11 Trustee's Request for Civil Sanctions Pursuant to the Court's Order to Show Cause [Adv. D.I. 85] (the "Reply")*, as more fully set forth in the Motion to Exceed; and due and proper notice of the Motion to Exceed having been provided; and it appearing that no other or further notice need be provided; and the Court having determined that there is just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

It is **HEREBY ORDERED THAT**:

1. The Motion to Exceed is **GRANTED**.
2. The Reply may exceed the fifteen (15) page limitation under Local Rule 7007-2 by an additional one (1) page for a total of seventeen (16) pages.