

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

In re: EPIC! CREATIONS, INC., <i>et al.</i> , Debtors.	Chapter 11 Case No. 24-11161 (BLS) (Jointly Administered) Hearing Date: March 31, 2025 at 10:00 a.m. Objection Deadline: March 19, 2025 at 4:00 p.m.
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 (BLS)
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Think and Learn Pvt. Ltd., and, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24- 50280 (BLS)

MOTION TO WITHDRAW AS COUNSEL

COMES NOW, Kevin S. Mann, Cross & Simon, LLC, Maureen V. Abbey Scorese and Chugh LLP (collectively “Counsel”), and request that this Court enter an Order authorizing them to withdraw as counsel for VOIZZIT Information Technology, LLC, VOIZZIT Technology Private Limited, and Rajendran Vellapalath (collectively, the “VOIZZIT Defendants”), in the above-captioned adversary proceedings and the Chapter 11 proceedings. In support thereof, Counsel states as follows:



1. On or about December 30, 2025, the Voizzit Defendants retained Counsel at Chugh LLP to provide representation in the Debtor's chapter 11 cases and executed an engagement letter. Such representation was later expanded to include the above-captioned adversary proceedings.

2. On or about January 27, 2025, Voizzit Defendants retained Counsel at Cross & Simon LLC as Delaware counsel in the above-captioned adversary proceedings.

3. Recently, circumstances and resulting irreconcilable differences have arisen that necessitate that Counsel withdraw as counsel pursuant to Delaware Lawyers Rules of Professional Conduct 1.16(b)(4), 1.16(b)(5), 1.16(b)(6) and 1.16(b)(7).

4. Specifically, good cause exists to withdraw as counsel for there exists a significant difference of opinion between the Voizzit Defendants and Counsel that makes continuing the representation unnecessarily difficult and the Voizzit Defendants have insisted upon taking action that Counsel has a fundamental disagreement with.

5. Counsel does not include details surrounding the reasons for the need to withdraw as counsel so as to not prejudice the Voizzit Defendants or otherwise disclose any attorney/client communications.¹

6. Further, pursuant to Delaware Professional Conduct Rule 1.16(b)(5), withdrawing is appropriate when the "client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled." Rule 1.16(b)(5). Here, the Voizzit Defendants have failed to meet their obligations to Counsel, have not paid for legal services of Counsel and have been provided notice of same. Additionally, and alternatively, withdrawing is appropriate if "the representation will

¹ Counsel is available to the Court for an *in camera* discussion should the Court believes one is necessary.

result in an unreasonable financial burden on the lawyer. . .” and where “good cause” exists. Rule 1.16(b)(6) and (7).

7. The issues set forth above have created conditions whereby Counsel is not able to continue to represent the Voizzit Defendants in these cases consistent with its obligations to both the Court and the Voizzit Defendants as required under the Delaware Lawyer’s Rules of Professional Conduct. As there has been a fundamental breakdown of the attorney-client relationship pursuant to Rule of Professional Conduct 1.16(b)(4), Counsel believes that withdrawal from representation is appropriate.

8. Counsel has notified the Voizzit Defendants in advance of this Motion that it intends to withdraw as counsel. Counsel has explained to the Voizzit Defendants the status of this bankruptcy and adversary proceedings as well as the potential consequences of Counsel’s withdrawal.

9. Voizzit Defendants have adequate time to employ other counsel and the Trustee will not be prejudiced by Counsel’s withdrawal.

10. Upon termination of the representation, Counsel will take steps to the extent reasonably practicable to protect Voizzit Defendants’ interests in accordance with Rule 1.16(d).

WHEREFORE, Counsel requests the Court to enter an Order allowing them to withdraw as counsel in the above-referenced matter.

Dated: March 5, 2025

CROSS & SIMON, LLC

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Technology LLC and Rajendran Vellapalath*

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In re: EPIC! CREATIONS, INC., <i>et al.</i> , Debtors.	Chapter 11 Case No. 24-11161 (BLS) (Jointly Administered) Hearing Date: March 31, 2025 at 10:00 a.m. Objection Deadline: March 19, 2025 at 4:00 p.m.
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Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Think and Learn Pvt. Ltd., and, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24- 50280 (BLS)

NOTICE OF MOTION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that Kevin S. Mann, Cross & Simon, LLC, Maureen V. Abbey Scorese, and Chugh LLP (collectively “Counsel”) filed the *Motion to Withdraw as Counsel* (the “Motion”), with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that, objections to the Motion, if any, must be filed on or before **March 19, 2025 at 4:00 p.m. (Prevailing Eastern Time)** (the “Objection Deadline”)

with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801.

At the same time, you must also serve a copy of the response upon the undersigned Counsel so that the response is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **March 31, 2025 at 10:00 a.m. (ET)** before The Honorable Brendan L. Shannon, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware, 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 5, 2025

CROSS & SIMON, LLC

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Private Ltd., VOIZZIT Information
Technology LLC and Rajendran Vellapalath*

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

<p>In re:</p> <p>EPIC! CREATIONS, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11 Case No. 24-11161 (BLS) (Jointly Administered)</p> <p>Re: Docket No. ____</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Google LLC, VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24-50233 (BLS)</p> <p>Re: Adv. Docket No. ____</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Think and Learn Pvt. Ltd., and, Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24- 50280 (BLS)</p> <p>Re: Adv. Docket No. ____</p>

ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL

Upon consideration of the motion of Kevin S. Mann, Cross & Simon, LLC, Maureen V. Abbey Scorese, and Chugh LLP (collectively “Counsel”), for leave to withdraw as counsel for VOIZZIT Information Technology, LLC, VOIZZIT Technology Private Limited, and Rajendran Vellapalath (collectively, the “VOIZZIT Defendants”), in the above-captioned cases and any responses therefore,

IT IS HEREBY ORDERED, the Motion is GRANTED.

CERTIFICATE OF SERVICE

I, Kevin S. Mann, hereby certify that, on this 5th day of March, 2025, I caused copies of the foregoing *Motion to Withdraw as Counsel* to be served upon all interested parties via CM/ECF and the parties listed below by electronic mail:

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/s/ Kevin S. Mann

Kevin S. Mann (No. 4576)