

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

In re:

EPIC! CREATIONS, INC., *et al.*,
Debtors.¹

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re. D.I. 294

NOTICE OF SERVICE OF RULE 2004 SUBPOENAS

PLEASE TAKE NOTICE that, in accordance with the *Order Granting Chapter 11 Trustee’s Motion for Order Authorizing the Trustee to Conduct Rule 2004 Examinations and to Issue Subpoenas in Support Thereof* [D.I. 294], Chapter 11 Trustee Claudia Z. Springer (the “Trustee”) issued and served Rule 2004 subpoenas on the parties set forth in Exhibit A (each a “Discovery Party,” collectively, the “Discovery Parties”) on the dates specified therein.

LOCAL RULE 2004-1 CERTIFICATION

The Trustee’s counsel has conferred with counsel to Jonathan Naseath, Suren Markosian, Kevin Donahue, Aaron Kornblum, and JPMorgan Chase Bank, N.A., to arrange for a mutually agreeable time date, time, place, and scope of those party’s productions and/or examinations, as applicable. Prior to moving to withdraw as counsel, counsel for Voizzit Technology Pvt. Ltd., Voizzit Information Technology LLC, and Rajendran Vellapalath acknowledged receipt of the subpoenas but indicated that she did not know if her clients will respond. The Trustee agreed to a short extension of the return date to allow counsel to communicate with her clients, however, other than receiving notice of a motion to withdraw as counsel, to date, Trustee’s counsel has heard

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).



nothing from counsel for Voizzit Technology Pvt. Ltd., Voizzit Information Technology LLC, and Rajendran Vellapalath nor have the foregoing parties responded to or produced and documents pursuant to the document requests.

The Trustee has also made mutually agreeable arrangements with Mark Solomon, Katherine Xu, and Cherian Thomas. Silicon Valley Bank, Thread Bank, Citibank, N.A., and Pramod Sharma whereby each have produced responsive documents to the Trustee without the need for a conference. The Trustee will continue to work with each Discovery Party and will conduct any further meet and confers as may be necessary so as to minimize the use of this Court's resources should discovery disputes arise.

Dated: March 11, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale

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Counsel to the Trustee

EXHIBIT A

Entity/Individual	Date Issued	Date Served¹	Method of Service
Silicon Valley Bank	1/13/2025	1/14/2025	Overnight Mail
John Naseath	1/15/2025	1/19/2025	Personal Service
Relay Financials Technology Inc.	1/22/2025	1/23/2025	Overnight Mail
Thread Bank	1/22/2025	1/23/2025	Overnight Mail
Citibank, N.A.	2/4/2025	2/5/2025	Overnight Mail
JPMorgan Chase Bank, N.A.	2/10/2025	2/11/2025	Overnight Mail
Rajendran Vellapalath	2/13/2025	2/13/2025	Email to Counsel
Voizzit Information Technology LLC	2/13/2025	2/13/2025	Email to Counsel
Voizzit Technology Private, Ltd.	2/13/2025	2/13/2025	Email to Counsel
Suren Markosian ²	2/14/2025	2/18/2025	Personal Service
Kevin Donahue	2/14/2025	N/A (cooperating though counsel)	
Katherine Xu	2/14/2025	2/14/2025	Personal Service
Pramod Sharma	2/14/2025	2/19/2025	Personal Service
Cherian Thomas	2/14/2025	2/19/2025	Personal Service
Mark Solomon	2/14/2025	2/21/2025	Personal Service
Aaron Kornblum	2/14/2025	2/21/2025	Personal Service

¹ The Trustee's process servers have also made multiple attempts to serve Rule 2004 subpoenas on former employee Joe Mixon and will continue to do so until service is completed.

² As it relates to Suren Markosian ("Markosian"), the Trustee served the subpoena prior to Markosian's retention of counsel. After conferring with Markosian's counsel, the Trustee and Markosian's counsel have reached an agreement whereby the Trustee will excuse compliance with the subpoena while Markosian and the Trustee try to come to subsequent agreement as it relates to a voluntary document exchange. This agreement is without prejudice to the Trustee's rights to re-issue a subpoena.