

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 (BLS)

(Jointly Administered)

Hearing Date: March 31, 2025 at 10:00 a.m. ET

Objection Date: March 24, 2025 at 4 p.m. ET

**CHAPTER 11 TRUSTEE’S MOTION TO COMPEL VOIZZIT  
TECHNOLOGY PRIVATE, LTD., VOIZZIT INFORMATION  
TECHNOLOGY LLC, AND RAJENDRAN VELLAPALATH TO COMPLY  
WITH RULE 2004 SUBPOENAS AND FOR OTHER RELIEF INCLUDING  
BARRING THEIR PARTICIPATION IN THESE CHAPTER 11 CASES  
UNTIL THEY COMPLY WITH THE OUTSTANDING SUBPOENAS**

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”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) brings this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A**, compelling Voizzit Technology Private, Ltd., Voizzit Information Technology LLC, and Rajendran Vellapalath (collectively, the “Voizzit Parties”) to comply with the Rule 2004 subpoenas attached hereto as **Exhibit B**, **Exhibit C**, and **Exhibit D** (collectively, the “Rule 2004 Subpoenas”) and granting certain related relief (including barring their participation in these Chapter 11 Cases until they comply with the outstanding subpoenas), and respectfully states:

<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).



**PRELIMINARY STATEMENT**

1. The Trustee files this Motion to avoid further disruption to these Chapter 11 Cases, including to the pending sale process. Through their conduct and their filings with this Court, the Voizzit Parties have made clear that they intend to disrupt the Trustee's efforts to sell the Debtors' assets. The Voizzit Parties allege that they control certain of the Debtors' stock (and while a shareholder has no direct ownership of a corporation's assets or the right to violate the automatic stay), they nonetheless briefly misappropriated certain of the Debtors' internet platforms based upon their alleged shareholder status. Indeed, their refusal to obey the law and this Court's Orders has been so contemptuous that even after the Court unwound the first of these wrongful seizures, the Voizzit Parties continued to seize the Debtors' assets. And once it became clear that the Court had unwound every one of their wrongful seizures and that their attempts to steal the Debtors' businesses had completely failed, they filed a lawsuit in India in violation of the automatic stay alleging that the court there should, in effect, unwind this Court's Orders.

2. As a result of their wrongful conduct to date, the Trustee has *three times* sought to obtain discovery from the Voizzit Parties about their alleged ownership of the Debtors, most recently through a subpoena issued pursuant to the Rule 2004 Order (defined below). And *three times* the Voizzit Parties have refused to answer this discovery. The Voizzit Parties' continued refusal to answer discovery is exacerbated by the fact that their counsel continually changes. Like their first set of lawyers, their second set of lawyers also has recently moved to withdraw from their representation of the Voizzit Parties claiming that the Voizzit Parties are not following counsel's advice. Given this pattern of conduct, the Trustee justifiably fears that as the sale hearing quickly approaches, the Voizzit Parties will again find new counsel and through new counsel once again seek continuances and make false claims about their alleged ownership status, all with the

intent of disrupting the sale. And while the Trustee has no doubt that the Court (and the prospective bidders) will see through this gambit, the Trustee is nonetheless entitled to the Rule 2004 examinations she seeks so that she is fully prepared to rebut the Voizzit Parties' false claims.

3. Moreover, the Trustee also is entitled to sanctions for the Voizzit Parties' failure to respond to the Rule 2004 Subpoenas. The Trustee submits that the appropriate sanction here would be an order barring the Voizzit Parties from participating in any capacity in these Chapter 11 Cases until they comply with the Rule 2004 Subpoenas. This sanction is appropriate because it is clear that lesser sanctions will not work. The Voizzit Parties have failed to respond to monetary sanctions—they currently owe over \$2 million in fines, costs, and damages that they refuse to pay and those sanctions continue to grow at the rate of \$25,000 per day. As recently as last week the Voizzit Parties again thumbed their noses at this Court's Orders, appearing in the Indian court hearing their lawsuit and prosecuting that wrongful case in violation of this Court's Orders. Because monetary sanctions have to date not worked, the Trustee submits, for the reasons set forth herein, that the appropriate sanction here is an order barring the Voizzit Parties from participating in any capacity in these Chapter 11 Cases until they comply with the Rule 2004 Subpoenas.

### **JURISDICTION AND VENUE**

4. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A) and (O). Pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the Trustee consents 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 the consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

5. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

6. The statutory and legal predicates for the relief sought herein are sections 105 and 1106(a)(3) of title 11 of the United States Code, Rule 45 of the Federal Rules of Civil Procedure, Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure, and Local Rule 2004-1.

### **BACKGROUND**

#### **A. The Bankruptcy Filing and the Trustee's Appointment.**

7. On June 4, 2024 with respect to Epic and on June 5, 2024 with respect to Neuron Fuel and Tangible Play (the "Petition Dates"), GLAS Trust Company LLC, in its capacity as administrative and collateral agent under that certain Credit and Guaranty Agreement dated November 24, 2021, and certain lenders under that Agreement (the "Petitioning Creditors") filed involuntary chapter 11 petitions against each Debtor. [D.I. 1].

8. On June 27, 2024, this Court entered an order directing joint administration of the Debtors' cases for procedural purposes. [D.I. 61].

9. On September 16, 2024 (the "Order for Relief Date"), this Court entered an order for relief in the Debtors' involuntary chapter 11 cases and directed the appointment of a chapter 11 trustee. [D.I. 147].

10. On September 23, 2024, the United States Trustee for Region 3 duly appointed Claudia Z. Springer as chapter 11 trustee of each Debtor's estate, subject to approval by the Court. [D.I. 152]. On October 7, 2024, this Court entered an order approving the appointment of the Trustee. [D.I. 180].

**B. The Rule 2004 Order and the Voizzit Parties' Failure to Comply with the Rule 2004 Subpoenas.**

11. On November 18, 2024, the Court entered 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] (the "Rule 2004 Order"). The Rule 2004 Order authorized the Trustee "to demand and compel by way of subpoena: (i) the oral examination, under oath, of any Discovery Party [including each Voizzit Party]; and (ii) the production of documents that might be relevant to the Investigation or lead the Trustee to information relevant to the Investigation." (Rule 2004 Order, ¶ 2.)

12. Paragraph 3(b) of the Rule 2004 Order states that "a Discovery Party that receives a subpoena seeking documents (whether or not it also seeks testimony) shall, within 14 days of service of such subpoena: (i) produce all non-privileged documents responsive to such subpoena; or (ii) file and serve a motion seeking a protective order[.]" (Rule 2004 Order, ¶ 3(b).) Paragraph 3(c) states "if the subpoena so directs, the Discovery Party shall appear for an oral examination within seven days of service of a deposition subpoena on the Discovery Party, which notice is deemed to be reasonable." (*Id.* ¶ 3(c).)

13. Consistent with Rule 2004 Order, on February 13, 2025, the Trustee served each Voizzit Party with the Rule 2004 Subpoenas, through delivery of the subpoenas upon their counsel of record, and requested that documents be produced by February 27, 2025 (*i.e.*, fourteen days after service) and that the Voizzit Parties sit for oral examinations on February 28, 2025. A true and correct copy of that email chain is attached hereto as **Exhibit E**.

14. On February 27, 2025, the Voizzit Parties' counsel, Maureen Scorese at Chugh LLP, acknowledged receipt of the Rule 2004 Subpoenas and requested additional time for her

clients to comply. The Trustee agreed to extend the production deadlines to March 3, 2025. (*See* Ex. E.)

15. On March 5, 2025, two days after the extended production deadline, Ms. Scorece and her firm filed a motion seeking leave to withdraw as the Voizzit Parties' counsel pursuant to Delaware Lawyers Rules of Professional Conduct 1.16(b)(4),(7) on the grounds that "the Voizzit [Parties] have insisted upon taking action that Counsel has a fundamental disagreement with." (D.I. 551 at 2.)

16. On March 11, 2025, after the Voizzit Parties failed to produce any documents or submit written responses or objections, the Trustee's counsel again reached out to Ms. Scorese. Ms. Scorese indicated that she was having difficulty obtaining her clients' compliance. A true and correct copy of that email chain is attached as **Exhibit F**.

17. On March 14, 2025, counsel for the Trustee and the Voizzit Parties spoke over the telephone. During that conversation, the Trustee's counsel advised Ms. Scorese that the Trustee intended to seek the relief requested herein because Ms. Scorese could not commit that the Voizzit Parties would comply with the Rule 2004 Subpoenas. A true and correct copy of that email is attached as **Exhibit G**.

**C. Voizzit Parties' Pattern of Improper Conduct and Discovery Failures.**

18. The Voizzit Parties' failure to comply with the Rule 2004 Subpoenas is just the latest instance of their egregious pattern of misconduct, discovery failures, and strategic delay throughout these Chapter 11 Cases. Since this Court entered orders for relief against the Debtors in September, 2024, the Voizzit Parties have engaged in a systematic effort to seize the Debtors' businesses and violate the automatic stay by asserting control over the online platforms, software

code, revenue streams, and other assets that are crucial to the Debtors' operations. These violations continued well after the Trustee first discovered the violations and sought relief from the Court.<sup>2</sup>

19. With respect to discovery specifically, the Voizzit Parties completely ignored the requests for production, interrogatories, and deposition notices the Trustee served on them on November 15, 2024 in connection with her motion to enforce the automatic stay with respect to the Debtors' Apple accounts. (*See* D.I. 277.)

20. Similarly, on January 23, 2025, prior to the show-cause hearing on the Voizzit Parties' failure to comply with the temporary restraining order entered in Adv. No. 24-50233 (the "Google Adversary Case"), the Trustee served requests for production, requests for admission, interrogatories, and deposition notices on each Voizzit Party pursuant to the *Order to Show Cause Expedited Discovery Order*, which directed the Voizzit Parties to respond to the Trustee's expedited discovery requests "within the time parameters [specified by the Trustee in the requests]." [Google Adv. D.I. 62, ¶ 3; *see also* Google Adv. D.I. 63.] The Voizzit Parties once again made no effort to comply with those requests.

21. Instead, the Voizzit Parties repeatedly waited until the eve of hearings to retain counsel to contest the Trustee's properly noticed motions. [*See, e.g.*, Bankr. D.I. 288; Adv. No. 23-50233, D.I. 23-25, , 59, 75, 80.] In both prior instances, the Voizzit Parties' newly retained counsel—first at Potter Anderson & Corroon LLP and then at Chugh LLP—then initially assured the Court and the Trustee that the Voizzit Parties fully intended to comply with their discovery and other obligations, but needed extra time to do so. [*See* D.I. 288, at 15-16; Google Adv. D.I. 59

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<sup>2</sup> The Trustee's January 21, 2025 status report in Adv. No. 24-50233 contains a full summary of the Voizzit Parties' stay violations, prior failures to comply with the Court's Orders, and the various proceedings related thereto. [*See* Adv. No. 24-50233, D.I. 55.]

at 4-7.] And in both instances, the Voizzit Parties nonetheless apparently ignored their new counsel's advice and refused to comply with the Court's orders.

22. In addition to shirking their discovery obligations, the Voizzit Parties have also refused to comply with their obligations under multiple prior orders of this Court. For example, they still have not complied with the *Order Granting Chapter 11 Trustee's Emergency Motion To Hold The Voizzit Defendants In Contempt Of Court For Their Failure To Comply With The Court's November 19 Order* [Adv. 24-50233, D.I. 94] (the "Google Contempt Order"), which imposes a \$25,000 daily fine on the Voizzit Parties until they comply with the temporary restraining order entered in the Google Adversary Case. As of the filing of this Motion, the Voizzit Parties owe a total of \$1,150,000 in unpaid fines under the Google Contempt Order.

23. The Voizzit Parties have also still not complied with the *Order Granting Chapter 11 Trustees Motion for Entry of a Preliminary Injunction* entered in Adv. 24-50280 requiring them to dismiss the lawsuit they filed in India to obtain control over the Debtors' assets. [Adv. D.I. 20.]

24. Nor have they returned the more than \$1 million they took from the Debtors' Apple accounts, even though the Court expressly directed them to do so at the December 3, 2024 hearing on the Trustee's Apple-related stay enforcement motion (which otherwise remains under advisement). (*See* Dec. 3, 2024 Hr'g Tr. at 68 ("The Chapter 11 Trustee controls these entities and you need to act expeditiously to unwind whatever you've done to take assets from these debtors, including the million-plus dollars that was taken from the Apple account that still hasn't been recovered").)

25. Given the Voizzit Parties' repeated pattern of waiting until the last minute to retain new counsel, seek extensions, and file frivolous objections, the Trustee is rightfully concerned that the Voizzit Parties will do the same thing again to disrupt the ongoing sale process. The Trustee's



concern is heightened by the testimony of William Hailer, who testified on November 21, 2024, that he participated in meetings where the principals of Think & Learn Pvt. Ltd. (“T&L”), the Debtors’ parent company, discussed disrupting the sale process.

26. Specifically, Mr. Hailer testified that when he spoke with T&L’s founder Byju Ravindran just days earlier on November 15 and 17, 2024, Mr. Ravindran specifically previewed the Voizzit Parties’ plans to “muddle the water” as much as they could by disputing the Trustee’s ownership of Epic’s and Tangible Play’s assets and businesses. [See Bankr. D.I. 338 at 44.] Mr. Hailer further testified that the stated goal of such litigation would be to destroy the value of the Estates’ assets so that the Term Loan B lenders would sell their claims to Mr. Hailer’s firm at a significant discount or to otherwise settle the outstanding loans on more favorable terms. [*Id.*]

27. The Indian lawsuit this Court ordered the Voizzit Parties to dismiss is fully consistent with the “muddle the water” strategy Mr. Hailer referenced. So too are the Voizzit Parties’ repeated empty assurances and delay tactics in these Chapter 11 Cases. Thus, the Trustee’s concerns that the Voizzit Parties will again appear with yet new counsel, promise to answer discovery while seeking continuances of the sale hearing is not unfounded.

### **RELIEF REQUESTED**

28. By this Motion, the Trustee requests entry of an order: (1) compelling the Voizzit Parties to comply with the Rule 2004 Subpoenas by (a) searching for and producing all responsive documents in their possession, custody, or control by the date that is not later than seven (7) days after entry of the Court’s order granting the relief requested in the Motion; and (b) sitting for oral examinations during the week of April 7, 2025; (2) finding that the Voizzit Parties forfeited any objections or privileges to the Trustee’s discovery requests by failing to timely assert them; and

(3) prohibiting the Voizzit Parties from participating in these Chapter 11 Cases until the Trustee files a certification confirming that they have fully complied with the Rule 2004 Subpoenas.

**BASIS FOR RELIEF REQUESTED**

29. Under Federal Rule of Civil Procedure 45, applicable in these chapter 11 cases by operation of Federal Rule of Bankruptcy Procedure 9016, the Trustee, “[a]t any time, on notice to the commanded person, . . . may move the court . . . for an order compelling production or inspection.” *See* Fed. R. Civ. P. 45(d)(2)(B)(i); *see also* Fed. R. Bankr. P. 2004(c) (providing that “the production of documents . . . may be compelled as provided in Rule 9016”); Fed. R. Bankr. P. 9016 (“Rule 45 . . . applies in cases under the [Bankruptcy] Code.”). Rule 45(g) further provides that the Court “may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.” Fed. R. Civ. P. 45(g).

30. As described above, it has now been two weeks since the agreed upon March 3, 2025 deadline for the Voizzit Parties to respond to the Rule 2004 Subpoenas expired. During that time, as demonstrated by the emails attached to this Motion, the Trustee has made a good-faith effort to elicit their compliance without involving the Court. Unfortunately, the Voizzit Parties continue to refuse to comply with their obligations under the Rule 2004 Subpoenas and this Court’s prior orders.

31. Where, as here, a party simply fails to take their obligations under Rule 45 seriously, courts routinely grant motions to compel to require them to do so. *See, e.g., High Tech National, LLC v. Stead*, 2020 WL 3605286, at \*3 (E.D. Pa. July 2, 2020) (granting motion to compel against party that ignored Rule 45 subpoena); *Ceuric v. Tier One, LLC*, 325 F.R.D. 588, 562 (W.D. Pa. 2018) (same); *Official Comm. of Unsecured Creditors v. Grant (In re Refco, Inc.)*, 2007 WL 9232701, at \*3-4 (N.D. Ill. Jan. 16, 2007) (upholding a bankruptcy court order

compelling production in compliance with a Rule 45 subpoena issued in connection with Bankruptcy Rule 2004). Similarly, courts have granted motions to compel where a party agrees to comply with discovery requests and later refuses to provide the requested information. *See, e.g., In re Jarvar*, 2010 WL 1328222, at \*7 (Bankr. D. Mont. Mar. 30, 2010) (granting a motion to compel due to the noncompliance in producing documents under an “informal agreement” between the parties).

32. Although Rule 45 does not itself specify a remedy for non-compliance, courts enjoy broad discretion to fashion appropriate remedies to secure compliance with subpoenas. *See, e.g., Northeast Women’s Center, Inc. v. McMonagle*, 939 F.2d 57, 70 (3d Cir. 1991). For example, “when considering an award of sanctions [for a Rule 2004 discovery violation] pursuant to its inherent powers, . . . a bankruptcy court may look to Rule 37 [or other rules] as a guide to determine the proper level of response to the contemnor’s offense.” *In re Nicole Energy Services, Inc.*, 356 B.R. 786, n. 1 (6th Cir. B.A.P. 2007) (citing *Pereira v. Felzenberg*, 1997 WL 698186, at \*6 (S.D.N.Y. Nov. 7, 1997)).

33. Rule 37 (applicable in adversary proceedings and contested matters by operation of Bankruptcy Rule 7037 and 9014, respectively) expressly permits courts to sanction a party’s discovery non-compliance by “prohibiting the disobedient party from supporting or opposing designated claims or defenses, or from introducing designated matters into evidence.” Fed. R. Civ. P. 37; *see also* Fed. R. Bankr. P. 7037. Similarly, Bankruptcy Rule 2019 permits the bankruptcy courts to sanction non-compliance with that Rule’s disclosure requirements by “refus[ing] to permit the entity, group, or committee to be heard or to intervene in the case.” Fed. R. Bankr. P. 2019(e)(2).

34. Here, the Trustee respectfully submits that the proper remedy fashioned from Rule 37 is to bar the Voizzit Parties from participating in these Chapter 11 Cases until they have fully complied with their discovery obligations. That relief is justified for several reasons. *First*, this is ***the third time*** the Voizzit Parties have refused to answer the Trustee's discovery while at the same time continuing to make claims that the discovery would test. After three strikes, it is clear that more than an order directing a response is needed to compel their compliance. *Second*, the Voizzit Parties are unlikely to respond to monetary sanctions. They already owe the estate more than \$1 million in stolen funds and an additional \$1 million in fines (and potentially more once the Court decides the pending Apple stay damages motion) and the Voizzit Parties have not paid a dime of what is owed.

35. *Finally*, barring the Voizzit Parties' further participation in these Chapter 11 Cases, including critically any sale hearing, is necessary to avoid irreparable harm and expense. The Voizzit Parties have claimed and may claim again a right to the Debtors' assets; yet they have never allowed the Trustee to test these claims through discovery (and which, in any event, are irrelevant to the Trustee's authority). And each time the Voizzit Parties make this claim, they appear through new counsel and demand a continuance. Therefore, to avoid any risk of delay and confusion, the Trustee wishes to cut off the Voizzit Parties from trying this gambit again. And while the Trustee believes that this Court will not tolerate such blatant bad faith behavior, and that prospective buyers will see through the Voizzit Parties' actions, she seeks prospective relief as a sanction for the willful failure to obey a subpoena and all of the Court's other orders to avoid any confusion and disruption that the Voizzit Parties may attempt to create in these Chapter 11 Cases.

36. For these reasons, the Trustee respectfully submits that prohibiting the Voizzit Parties from participating in these Chapter 11 Cases until they respond to the Trustee's Rule 2004

Subpoenas is both warranted and critical to ensuring the Trustee is able to expediently complete the ongoing sale process without delay or distraction.

**RULE 2004-1 CERTIFICATION**

37. The Trustee's undersigned Delaware counsel hereby certifies that, as detailed above, the Trustee made a good-faith effort to secure the Voizzit Parties' compliance with the Rule 2004 Subpoenas before filing this Motion. As reflected in **Exhibit D**, the Trustee agreed to allow the Voizzit Parties until March 3, 2025 to respond to the Rule 2004 Subpoenas. After they failed to comply, the Trustee's counsel Catherine Steege at Jenner & Block LLP conferred with the Voizzit Parties' counsel Maureen Scorese on multiple occasions between March 3 and March 14, 2025 both via email and telephonically, but was not able to secure the Voizzit Parties' compliance without Court intervention.

*[intentionally left blank]*

**CONCLUSION**

**WHEREFORE** the Trustee respectfully requests entry of the Proposed Order, substantially in the form annexed hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as the Court may deem just and equitable.

Dated: March 17, 2025  
Wilmington, Delaware

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

/s/ Alexis R. Gambale

Henry J. Jaffe (No. 2987)  
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-and-

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*Counsel to the Trustee*

**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 (BLS)

(Jointly Administered)

Hearing Date: March 31, 2025 at 10:00 a.m. ET

Objection Date: March 24, 2025 at 4:00 p.m. ET

**NOTICE OF HEARING REGARDING CHAPTER  
11 TRUSTEE’S MOTION TO COMPEL VOIZZIT TECHNOLOGY  
PRIVATE, LTD., VOIZZIT INFORMATION TECHNOLOGY LLC, AND  
RAJENDRAN VELLAPATH TO COMPLY WITH RULE 2004 SUBPOENAS AND FOR  
OTHER RELIEF INCLUDING BARRING THEIR PARTICIPATION IN THE CASE  
UNTIL THE VOIZZIT PARTIES COMPLY WITH THE OUTSTANDING SUBPOENAS**

**PLEASE TAKE NOTICE** that on March 17, 2025, Claudia Z. Springer, Esq., in her capacity 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, collectively the “Debtors”) filed the *Chapter 11 Trustee’s Motion to Compel Voizzit Technology Private, Ltd., Voizzit Information Technology LLC and Rajendran Vellapath to Comply with Rule 2004 Subpoenas and for Other Relief Including Barring Their Participation in the Case Until the Voizzit Parties Comply with the Outstanding Subpoenas* (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion must (a) be in writing, (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801, on or before **March 24, 2025 at 4:00 p.m. (E.T.)** (the “Objection Deadline”), and (c) served as to be received on or before the Objection Deadline upon (a) the Debtors, (b) counsel to the Trustee, Jenner & Block LLP, 353 N. Clark Street, Chicago, Illinois 60654, Attn: Catherine Steege (csteege@jenner.com) and Melissa Root (mroot@jenner.com); (c) co-counsel to the Trustee, Pashman Stein Walder Hayden, P.C., 824 N. Market Street, Suite 800, Wilmington, DE 19801, Attn: Henry J. Jaffe (hjaffe@pashmanstein.com), Joseph C. Barsalona II (jbarsalona@pashmanstein.com) and Alexis R. Gambale (agambale@pashmanstein.com), and (d) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Linda J. Casey (Linda.Casey@usdoj.gov).

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<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).

**PLEASE TAKE FURTHER NOTICE** that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

**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, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6<sup>TH</sup> FLOOR, COURTROOM 1, WILMINGTON, DELAWARE 19801.**

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

Dated: March 17, 2025  
Wilmington, Delaware

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

/s/ Alexis R. Gambale

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-and-

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*Co-counsel to the Trustee*



**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

Case No. 24-11161 (BLS)

(Jointly Administered)

Re: D.I. \_\_

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION TO COMPEL VOIZZIT  
TECHNOLOGY PRIVATE, LTD., VOIZZIT INFORMATION TECHNOLOGY LLC,  
AND RAJENDRAN VELLAPALATH TO COMPLY WITH RULE 2004  
SUBPOENAS AND FOR OTHER RELIEF INCLUDING BARRING  
THEIR PARTICIPATION IN THESE CHAPTER 11 CASES UNTIL  
THEY COMPLY WITH THE OUTSTANDING SUBPOENAS**

Upon consideration of the *Chapter 11 Trustee’s Motion To Compel Voizzit Technology Private, Ltd., Voizzit Information Technology LLC, and Rajendran Vellapalath To Comply With Rule 2004 Subpoenas and for Other Relief Including Barring Their Participation in these Chapter 11 Cases until They Comply with the Outstanding Subpoenas* (the “Motion”)<sup>2</sup> filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Trustee”) of the above-captioned debtors (the “Debtors”); the Court having reviewed the Motion, and its supporting papers and any objections thereto; and the Court having held a hearing on March 31, 2025 (the “Hearing”); and the Court having considered all evidence and arguments presented at the Hearing; the Court finds and concludes as follows:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A).

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<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).

<sup>2</sup> Capitalized terms used herein and not defined shall have the meaning given to them in the Motion.

B. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409(a).

C. Notice of the Motion and the Rule 2004 Subpoenas was sufficient under the circumstances.

D. The legal and factual bases set forth in the Motion, the evidence submitted in support of the Motion, and the arguments presented at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Voizzit Information Technology LLC, Voizzit Technology Pvt. Ltd, and Rajendran Vellapalath (collectively, the “Voizzit Parties”) failed to timely comply with the Rule 2004 Subpoenas within the time period set forth in the Rule 2004 Subpoenas as extended by the parties’ agreement, and that the Voizzit Parties therefore forfeited any objections or privileges they may have otherwise been entitled to assert in relation to the discovery requested in the Rule 2004 Subpoenas.

For the reasons stated on the record at the Hearing, it is hereby **DECLARED** and **ORDERED THAT:**

1. Within seven (7) days after entry of this Order, the Voizzit Parties shall take all necessary steps to search for and produce to the Trustee all responsive documents requested in the Rule 2004 Subpoenas within their possession, custody, or control.

2. The Voizzit Parties shall provide testimony under oath at an oral examination to be conducted by the Trustee during the week of April 7, 2025.

3. Until the Trustee files a certification confirming that the Voizzit Parties have fully satisfied their obligations under paragraphs 1 and 2 of this Order, the Voizzit Parties shall have no right to appear, be heard, or otherwise participate in these Chapter 11 Cases.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

**Exhibit B**

**(Rule 2004 Subpoena to Rajendran Vellapalath)**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re EPIC! CREATIONS, INC., et al.  
Debtors

Case No. 24-11161 (BLS)  
Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Rajendran Vellapalath

*(Name of person to whom the subpoena is directed)*

■ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE	DATE AND TIME
Via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509)	February 28, 2025, at 8:00 a.m. (prevailing Central Time)

The examination will be recorded by this method: Stenographic and/or audio visual means.

■ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

All Documents and Communications responsive to the Document Requests and Interrogatories in the attached Rider.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: February 13, 2025

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

/s/ Melissa Root  
*Attorney's signature*

The name, address, email address, and telephone number of the attorneys representing Claudia Z. Springer, as Chapter 11 Trustee, who issues or requests this subpoena, are:

Melissa Root, Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654, mroot@jenner.com, (312) 840-7255

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for *(name of individual and title, if any)*: \_\_\_\_\_ on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$\_\_\_\_\_.

My fees are \$\_\_\_\_\_ for travel and \$\_\_\_\_\_ for services, for a total of \$\_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



**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 (BLS)

(Jointly Administered)

**RIDER TO RULE 2004 SUBPOENA**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”), through her undersigned counsel, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rules 2004, 9014, and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 45 of the Federal Rules of Civil Procedure, the Local Rules of the United States Bankruptcy Court for the District of Delaware, and 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] (the “Rule 2004 Order”), a copy of which is attached hereto as **Exhibit A**, will take the deposition upon oral examination of Rajendran Vellapalath.

The oral examination will take place on **February 28, 2025 at 8:00 a.m. (prevailing Central Time)** via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509) and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. It shall continue from day to day until it has been completed.

In addition, pursuant to the Rule 2004 Order, on or before **February 27, 2025**, Rajendran Vellapalath shall search for and produce all documents responsive to the requests for production set forth in **Exhibit B**.<sup>2</sup>

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<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).

<sup>2</sup> Unless otherwise defined, all capitalized terms used herein and in Exhibits B shall have the meaning ascribed in the list of definitions set forth in **Exhibit C**.

Wilmington, Delaware  
February 13, 2025

/s/ Melissa Root

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

Joseph C. Barsalona II  
824 North Market Street, Suite 800  
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*)  
William A. Williams (admitted *pro hac vice*)  
353 N. Clark Street  
Chicago, Illinois 60654  
Telephone: (312) 923-2952  
csteege@jenner.com  
mroot@jenner.com  
wwilliams@jenner.com

*Counsel to the Trustee*

**EXHIBIT A**

**RULE 2004 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

Case No. 24-11161 (JTD)

(Jointly Administered)

Related D.I.: 253

**ORDER GRANTING CHAPTER 11 TRUSTEE'S MOTION FOR ORDER  
AUTHORIZING THE TRUSTEE TO CONDUCT RULE 2004  
EXAMINATIONS AND TO ISSUE SUBPOENAS IN SUPPORT THEREOF**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”) has filed a motion (the “Motion”)<sup>2</sup> [D.I. 253] for an order authorizing the Trustee to issue subpoenas and conduct examinations under Federal Rule of Bankruptcy Procedure 2004; and the Court having jurisdiction to consider the Motion and the relief requested therein under 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(A) and (O); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and a hearing having been held on November 20, 2024 to consider the relief requested in the Motion (the “Hearing”); and upon the record of the Hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors’

<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).

<sup>2</sup> All capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

estates, creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS ORDERED THAT:**

1. The Motion is **GRANTED** as provided herein.
2. The Trustee is authorized, under Bankruptcy Rule 2004 and without further order of the Court, to demand and compel by way of subpoena: (i) the oral examination, under oath, of any Discovery Party (including, but not limited to, each Initial Discovery Party identified in **Exhibit 1** attached hereto); and (ii) the production of documents that might be relevant to the Investigation or lead the Trustee to information relevant to the Investigation. The Trustee may serve such subpoenas on any Discovery Party she subsequently identifies without needing to file a separate motion.
3. The following procedures shall apply in connection with the Trustee's issuance of any subpoena under Rule 2004:
  - a. The Trustee may serve a Rule 2004 subpoena on any Discovery Party without needing to file a separate motion. As soon as reasonably practicable thereafter, the Trustee shall file with the Court a notice of service for each subpoena served, which notice shall include the certification required by Local Rule 2004-1;
  - b. Except as otherwise agreed by the Trustee, or subsequently ordered by the Court, a Discovery Party that receives a subpoena seeking documents (whether or not it also seeks testimony) shall, within fourteen days after service of such subpoena: (i) produce all non-privileged documents responsive to such subpoena on a rolling basis at the earliest possible date (along with a privilege log describing any documents withheld on the basis of privilege containing sufficient detail to establish the nature and facial validity of such assertion); or (ii) file and serve a motion seeking a protective order, which the Court may hear on shortened notice no later than seven days from the filing of such motion (or at the Court's earliest convenience thereafter);

c. If the subpoena so directs, the Discovery Party shall appear for an oral examination within seven days of service of a deposition subpoena on the Discovery Party, which notice is deemed to be reasonable;

d. As necessary to implement the foregoing, the Trustee and her counsel are authorized to sign and issue a subpoena from any United States Bankruptcy Court for the applicable district in which a Discovery Party resides, does business, maintains documents or is found, both to obtain documents from such Discovery Party and to command the attendance of such Discovery Party at a deposition. The Trustee and her counsel also are authorized to take such actions as may be necessary in any other court to enforce subpoenas and otherwise effectuate the terms of this Order;

e. The Prepetition Agent and Prepetition Secured Lenders are authorized to and shall receive the documents produced in response to a subpoena by a Discovery Party and fully participate in the oral examination of a Discovery Party;

f. Nothing in this Order limits the substantive rights of any Discovery Party or other party under applicable law to object to or oppose any subpoena the Trustee might serve.

4. Except as otherwise agreed between the Trustee and any Discovery Party, all confidential documents produced to the Trustee shall be governed by the Protective Order [D.I. 111]. In these Chapter 11 Cases and any related adversary case, the Trustee and any other recipient of such confidential documents may file under seal in accordance with Local Rule 9018-1 copies of any confidential documents and any motions, briefs, pleadings, or other filings discussing or describing confidential documents or confidential information without filing a separate motion.

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5. This Court shall retain jurisdiction to resolve any disputes arising or related to this Order, including any discovery disputes that may arise between or among the parties and to interpret, implement, and enforce the provisions of this Order.

Dated: November 18th, 2024  
Wilmington, Delaware

  
JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Initial Discovery Parties**

- Byju Raveendran
- Riju Ravindran
- Divya Gokulnath
- Roshan Thomas
- Vinay Ravindra
- Jonathan Naseath
- Les Wright
- Pramod Sharma
- Cherian Thomas
- Mark Solomon
- Suren Markosian
- Kevin Donahue
- Shaji Puthalath
- Jino Joseph & Associates
- Think & Learn Private Ltd.
- Camshaft Capital Fund
- William Cameron Morton
- Voizzit Technology Private Ltd.
- Voizzit Information Technology LLC
- Rajendran Vellapalath
- Aswanit Nambarambath
- Whitehat Education Technology LLC
- Byju's Beta, Inc.
- Inspilearn LLC
- Wells Fargo Bank, NA
- First Citizens Bank, as successor by merger to Silicon Valley Bank
- Relay Financial Technologies Inc.
- Google LLC
- Salesforce, Inc.
- Slack Technologies, LLC
- Zendesk, Inc.
- Auctane, Inc. (Stamps.com)
- GoDaddy Operating Company, LLC
- CloudFlare, Inc.
- Microsoft Corp. (GitHub)



**EXHIBIT B**

**REQUESTS FOR PRODUCTION**

### **REQUESTS FOR PRODUCTION**

Chapter 11 Trustee Claudia Z. Springer requests that Rajendran Vellapalath produce all non-privileged Documents in his possession, custody, and control responsive to the below requests to her counsel at Jenner & Block LLP, 353 N. Clark Street, Chicago, Illinois 60654, Attn: Melissa Root (mroot@jenner.com) on or before February 27, 2025.

### **INSTRUCTIONS AND DEFINITIONS**

1. The definitions set forth in **Exhibit C** apply herein.
2. Each Request shall be responded to completely, separately, and fully.
3. If You object to any part of these Requests, please: (a) state each objection You assert in sufficient detail to permit the Court to determine the validity of the objection; and (b) disclose all responsive information to which your objection does not apply.
4. If You claim that all or any part of any Request is vague or ambiguous, please identify the specific language you consider vague or ambiguous and state the interpretation of the language in question you used to frame your response.
5. If You withhold information responsive to any of these Requests based upon any claim of privilege, provide a log or index that includes, at a minimum, the following information: (a) the specific privilege asserted or other particular reason you rely upon for not disclosing the information; (b) the identity of all persons having knowledge of any facts relating to the claim of non-disclosure or privilege; (c) a general description of the information withheld; (d) the identity of all persons who possess or claim to possess the information withheld; (e) the last known physical location of the information withheld; and (f) the identity of all Documents relating to the claim of non-disclosure, privilege, or other reason for not producing the information withheld.

6. In producing Documents, You are requested to produce an exact copy of the original of each Document requested together with all non-identical copies and drafts of that Document. Each Document shall be legible and bound in the same manner as the original. Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to each demand contained herein.

7. If more than one copy of a responsive Document exists, produce each copy that includes: (a) any notations or markings not on other copies, including handwritten notations or routing or filing instructions; and (b) attachments not included as part of other copies.

8. 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.

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

10. 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.

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

12. Documents not otherwise directly responsive to these Requests shall be produced if such Documents mention, discuss, refer to or explain the Documents that are called for by these Requests or if such Documents are attached to the Documents called for by these Requests and constitute routing slips, transmittal memoranda, cover letters, comments, or similar materials.

13. If any requested Documents are maintained in digital, electronic, or imaged form, production of a copy of the electronically stored information in digital, electronic, or imaged form

is hereby requested, along with any information needed to access, search, or sort electronic data or Documents.

14. Electronically stored information should be produced in accordance with the following specifications:

- (i) Form of Production. Produce electronically stored information in single page tiff format (Group IV tiff at 300 dpi) or in JPG format for Documents in color. Productions shall be made on encrypted media (e.g. CD/DVD or portable hard drive) with Opticon image load files (.OPT). TIFF/JPG image naming conventions should be limited to alphanumeric names only, with no spaces, no hyphens, and no special characters in the file name (e.g. ABCOOOOOOO1.tif). All fielded database information (including extracted metadata from electronic Documents) should be delivered in a standard Concordance load file format (.DAT). Group every 1,000 tiff images within incrementally named "IMAGES" directories; do not create a separate folder for each Document.
- (ii) Document Text. For Documents/records that were originally stored as native electronic files and which do not have redactions, produce the extracted full text (not OCR) from the body of each Document in separate Document-level text files (.txt) named for the beginning Bates number of the associated Document. Provide OCR text for Documents that do not contain searchable text (e.g. non-searchable PDFs, etc.). For Documents that were originally stored as native electronic files and which have redactions, produce the OCR text from the redacted image(s) associated with each Document. Clearly label any redacted material to show the redactions on the tiff image. Group 1,000 Document text files per incrementally named "TEXT" directories, separate from image directories. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the extracted text/OCR files.
- (iii) Native Production For Certain File Types. For files created by Excel or other spreadsheet programs, PowerPoint or other special presentation programs, database files, audio/visual files or any other file types that reasonably require viewing in their native format for a full understanding of their content and meaning, produce the files in native and tiff formats. Name the produced native file with the Bates number on the first page of the corresponding tiff production of the file / Document. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the native files. Group native files within

incrementally named "NATIVE" directories, separate from images and text directories.

- (iv) Metadata. Produce extracted metadata for each Document/record in the form of a Concordance load file (.dat), including the following fields (where applicable): bates range begin, bates range end, bates family range begin, bates family range end, e-mail subject line, file extension, original file path, file name, e-mail sent date, e-mail sent time, created date, created time, last modified date, last modified time, author, from, to, CC, BCC, custodian, source, source folder, MD5 hash value, native file path location, and confidentiality designation. Custodian, source, or source folder fields should contain information that can easily identify the location of the Document and, where applicable, the natural person in whose possession it was found.

15. In responding to each Request, state whether and to what extent any of the responsive Documents have been translated from any foreign language into English. If any responsive Document is partly or wholly in a language other than English, state whether any translation of the non-English language information exists and, if so, provide both the non-English language information and its English translation.

16. If, after conducting a reasonable investigation, a full answer cannot be provided for any Request for the production of Documents, so state and answer to the fullest extent possible, stating what responsive Documents are available, what Documents cannot be provided and why, and what efforts were made to obtain the unavailable Documents.

17. If any Document responsive to these Requests are no longer in your possession, custody, or control, identify each such Document by date, type of Document, person(s) from whom sent, person(s) to whom sent, person(s) receiving copies, a summary of its contents, and explain why the Document or Documents are no longer in your possession, custody, or control.

18. If any Document responsive to these Requests has been destroyed, describe the content of such Document, the location of any copies of such Document, the date of such destruction, the reason for such destruction, the name of the person or persons who ordered or

authorized such destruction, and the name of the person or persons who performed such destruction.

19. These Requests shall be deemed to be continuing so as to require supplemental productions if necessary to maintain the accuracy and completion of your production. If at any time after compliance with these demands you should acquire possession, custody, or control of any additional information within the scope of the demands, promptly furnish such information to the Trustee's attorneys in a supplemental response.

### **DOCUMENT REQUESTS**

1. All Communications between or among You and Your agents or representatives, on the one hand, and Think & Learn, Byju Raveendran, Riju Ravindran, Vinay Ravindra, Divya Gokulnath, Pankaj Srivastava, or any of their agents or representatives.

2. Your audited financial statements from September 2023-present.

3. Your unaudited financial statements from September 2023-present.

4. All monthly statements for Your bank accounts at Emirates Islamic Bank and Bank of Singapore for the time period of January 1, 2023 through the present.

5. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning the transfer, deposit, or any other movement of funds derived from any of the Debtors or their customers.

6. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any transfer of funds between You, or any Voizzit Entity or Voizzit Insider, on the one hand, and any BYJU's Entity or BYJU's Insider, on the other hand, including without limitation in relation to the transactions described in the *Declaration of Rajendran Vellapalath in support of Voizzit Information Technology LLC, Voizzit Technology Private Limited and*

*Rajendran Vellapalath's Brief In Opposition To Preliminary Injunction* [Adv. No. 24-50233, Dkt. No. 25].

7. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any use of funds by You, or any Voizzit Entity or Voizzit Insider, in relation to the business or operations of any Debtor.

8. All Documents and Communications relating to any Debtor App from April 1, 2024, to the present.

9. All Documents and Communications relating to any instructions or authorizations You or any Voizzit Entity or Voizzit Insider contend they received with respect to the Debtors' assets from any party other than the Trustee.

10. All Documents and Communications relating to any Apple Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Apple Transfer, or any Apple Account.

11. All Documents and Communications relating to any Amazon Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Amazon Transfer, or any Amazon Account.

12. All Documents and Communications relating to any Google Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Google Transfer, or any Google Account.

13. All Documents and Communications relating to any Stripe Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Stripe Transfer, or any Stripe Account.

14. All Documents and Communications relating to the transaction reflected in the below screenshot from the Stripe Account.



15. All Documents and Communications relating to any Cloudflare Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Cloudflare Transfer, or any Cloudflare Account.

16. All Documents and Communications relating to any transaction between You, or any Voizzit Entity or Voizzit Insider, on the one hand, and any Byju's Entity or Byju's Insider, on the other hand.

17. All Documents and Communications relating to the November 19 TRO.

18. All Documents and Communications relating to the December 3 PI.

19. All Documents and Communications relating to the December 11 TRO

20. All Documents and Communications relating to the December 18 PI.

21. All Documents and Communications relating to 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.

22. All Documents and Communications relating to the representations in Paragraph 2 of the Voizzit Response.



23. All Documents and Communications relating to the representations in Paragraph 3 of the Voizzit Response.

24. All Documents and Communications relating to the representations in Paragraph 4 of the Voizzit Response.

25. All Documents supporting Your counsel's statements on November 12, 2024, "I am now in possession of documents that purport to show a September 2023 loan from Riju Ravindran, principal at Voizzit, in the face amount of \$100 million and then a subsequent assignment of that loan from Riju Ravindran to Voizzit in December of 2023, and then a default notice and foreclosure triggered by the initiation of an Indian insolvency proceeding dated April 2024" and that "This foreclosure notice and default notice purports to be effective as against the entire stock of Epic!, Tangible Play, and seemingly all of the relevant IP. All of this happened prior to the involuntary and prior to the appointment of the trustee. So, critically, the trustee may not be administering property of the estate at this juncture and worse it may be seeking to sell it."

26. All Documents and Communications relating to Your, or any Voizzit Entity's or Voizzit Insider's, purported exclusive ownership and control over Epic and Tangible play on or after April 2, 2024.

27. All Communications with any director, officer, or employee of any Debtor from January 1, 2024 to the present.

28. All books and records of each Debtor.

29. All Documents and Communications relating to the representations in Paragraph 8 of the Voizzit Response.

30. All Documents and Communications related to Exhibit 1 to the Voizzit Response and its contents and the metadata for those emails.

31. All Documents and Communications with or concerning William Hailer or Rose Lake, Inc. or their respective advisors.

**EXHIBIT C**

**DEFINITIONS**

## **DEFINITIONS**

A. “Communication” includes, without limitation, all oral, written, or other exchange or transmission of information, regardless of whether made in person, by telephone, by electronic means, or by any other means including, without limitation, emails, memoranda, files, and notes.

B. “Document” includes, without limitation, any memorialization, whether written, typed, printed, photographic, recorded, or stored by any electronic or computerized form or otherwise preserved by any means, whether draft or final, and whether original or reproduced. The term “Document” includes but is not limited to correspondence, e-mails, computerized records, facsimiles, invoices, reports, papers, disks, tapes, CDs, notes, transcripts of oral conversations or statements however made, labels, paper, and forms filed with courts or other governmental bodies, notices, messages, calendar and diary entries, letters, or any other memoranda.

C. “Each” means each, every, and any.

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

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

F. “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.

G. “Apple Account” refers to any account of any Debtor with Apple, Inc..

H. “Apple Transfer” means any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Apple Account; (ii) any project or data of any Debtor from any Apple Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Apple Account.

I. “Amazon Account” refers to any account of any Debtor with Amazon, Inc..

J. “Amazon Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Amazon Account; (ii) any project or data of any Debtor from any Amazon Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Amazon Account.

K. “Cloudflare Account” refers to any account of any Debtor with Cloudflare, Inc.

L. “Cloudflare Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of any domain registration or related property or data to or from any Cloudflare Account.

M. “BYJU’s Entities” means Think & Learn Private Ltd. (d/b/a “Byju’s”) and each of its subsidiaries, including without limitation, each Debtor, Whitehat Technology LLC, Byju’s Alpha, Inc., and Byju’s Beta, Inc.

N. “BYJU’s Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of any Byju’s Entity. The Byju’s Insiders include, without limitation, Byju Ravindran, Riju Raveendran, and Vinay Ravindra.

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

P. “Debtor App” means each software application related to Epic! Creations, Inc., Tangible Play, Inc., or Neuron Fuel, Inc.

Q. “December 3 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 3, 2024, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 36.

R. “December 11 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on December 11, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 12.

S. “December 18 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 18, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 20.

T. “Google Account” refers to any account of any Debtor with Google LLC.

U. “Google Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Google Account; (ii) any project or data of any Debtor from any Google Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Google Account.

V. “November 19 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on November 19, 2024 in Adversary Proceeding No. 24-50233 at Adv. Dkt. 14.

W. “Stay Enforcement Motion” means the *Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 244] filed on November 4, 2024.

X. “Stay Enforcement Order” means the *Order Granting In Part Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 276] entered on November 12, 2024.

Y. “Stripe Account” refers to any account of any Debtor with Stripe, Inc.

Z. “Stripe Transfer” refers to any transfer or attempted transfer of funds, from June 4, 2024, to the present, from any Stripe Account.

AA. “You” and “Your” refer to Rajendran Vellapalath and each of his subsidiaries, agents, attorneys, employees, representatives, and others within its control.

BB. “Voizzit Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of any Voizzit Entity.

CC. “Voizzit Entity” refers to Voizzit Information Technology LLC and any entity that directly or indirectly shares common ownership with Voizzit Information Technology LLC, including but not limited to Voizzit Technology Private Ltd.

DD. “Voizzit Response” means *Voizzit Information Technology LLC, Voizzit Technology Private Limited And Rajendran Vellapalath’s Response to Order to Show Cause and Motion to Dismiss the Complaint* filed under seal on January 27, 2025, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 80.

**Exhibit C**

**(Rule 2004 Subpoena to Voizzit Information Technology LLC)**



UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re EPIC! CREATIONS, INC., et al.  
Debtors

Case No. 24-11161 (BLS)  
Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Voizzit Information Technology LLC

*(Name of person to whom the subpoena is directed)*

■ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE	DATE AND TIME
Via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509)	February 28, 2025, at 8:00 a.m. (prevailing Central Time)

The examination will be recorded by this method: Stenographic and/or audio visual means.

■ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

All Documents and Communications responsive to the Document Requests and Interrogatories in the attached Rider.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: February 13, 2025

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

/s/ Melissa Root  
*Attorney's signature*

The name, address, email address, and telephone number of the attorneys representing Claudia Z. Springer, as Chapter 11 Trustee, who issues or requests this subpoena, are:

Melissa Root, Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654, mroot@jenner.com, (312) 840-7255

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for *(name of individual and title, if any)*: \_\_\_\_\_ on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$\_\_\_\_\_.

My fees are \$\_\_\_\_\_ for travel and \$\_\_\_\_\_ for services, for a total of \$\_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**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 (BLS)

(Jointly Administered)

**RIDER TO RULE 2004 SUBPOENA**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”), through her undersigned counsel, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rules 2004, 9014, and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 45 of the Federal Rules of Civil Procedure, the Local Rules of the United States Bankruptcy Court for the District of Delaware, and 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] (the “Rule 2004 Order”), a copy of which is attached hereto as **Exhibit A**, will take the deposition upon oral examination of the designated witness of Voizzit Information Technology LLC. A list of the deposition topics is set forth on **Exhibit B**.

The oral examination will take place on **February 28, 2025 at 8:00 a.m. (prevailing Central Time)** via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509) and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. It shall continue from day to day until it has been completed.

In addition, pursuant to the Rule 2004 Order, on or before **February 27, 2025**, Voizzit Information Technology LLC shall search for and produce all documents responsive to the requests for production set forth in **Exhibit C**.<sup>2</sup>

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<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).

<sup>2</sup> Unless otherwise defined, all capitalized terms used herein and in Exhibits B and C shall have the meaning ascribed in the list of definitions set forth in **Exhibit D**.

Wilmington, Delaware  
February 13, 2025

/s/ Melissa Root

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

Joseph C. Barsalona II  
824 North Market Street, Suite 800  
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*)  
William A. Williams (admitted *pro hac vice*)  
353 N. Clark Street  
Chicago, Illinois 60654  
Telephone: (312) 923-2952  
csteege@jenner.com  
mroot@jenner.com  
wwilliams@jenner.com

*Counsel to the Trustee*

**EXHIBIT A**

**RULE 2004 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

Case No. 24-11161 (JTD)

(Jointly Administered)

Related D.I.: 253

**ORDER GRANTING CHAPTER 11 TRUSTEE'S MOTION FOR ORDER  
AUTHORIZING THE TRUSTEE TO CONDUCT RULE 2004  
EXAMINATIONS AND TO ISSUE SUBPOENAS IN SUPPORT THEREOF**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”) has filed a motion (the “Motion”)<sup>2</sup> [D.I. 253] for an order authorizing the Trustee to issue subpoenas and conduct examinations under Federal Rule of Bankruptcy Procedure 2004; and the Court having jurisdiction to consider the Motion and the relief requested therein under 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(A) and (O); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and a hearing having been held on November 20, 2024 to consider the relief requested in the Motion (the “Hearing”); and upon the record of the Hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors’

<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).

<sup>2</sup> All capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

estates, creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS ORDERED THAT:**

1. The Motion is **GRANTED** as provided herein.
2. The Trustee is authorized, under Bankruptcy Rule 2004 and without further order of the Court, to demand and compel by way of subpoena: (i) the oral examination, under oath, of any Discovery Party (including, but not limited to, each Initial Discovery Party identified in **Exhibit 1** attached hereto); and (ii) the production of documents that might be relevant to the Investigation or lead the Trustee to information relevant to the Investigation. The Trustee may serve such subpoenas on any Discovery Party she subsequently identifies without needing to file a separate motion.
3. The following procedures shall apply in connection with the Trustee's issuance of any subpoena under Rule 2004:
  - a. The Trustee may serve a Rule 2004 subpoena on any Discovery Party without needing to file a separate motion. As soon as reasonably practicable thereafter, the Trustee shall file with the Court a notice of service for each subpoena served, which notice shall include the certification required by Local Rule 2004-1;
  - b. Except as otherwise agreed by the Trustee, or subsequently ordered by the Court, a Discovery Party that receives a subpoena seeking documents (whether or not it also seeks testimony) shall, within fourteen days after service of such subpoena: (i) produce all non-privileged documents responsive to such subpoena on a rolling basis at the earliest possible date (along with a privilege log describing any documents withheld on the basis of privilege containing sufficient detail to establish the nature and facial validity of such assertion); or (ii) file and serve a motion seeking a protective order, which the Court may hear on shortened notice no later than seven days from the filing of such motion (or at the Court's earliest convenience thereafter);



c. If the subpoena so directs, the Discovery Party shall appear for an oral examination within seven days of service of a deposition subpoena on the Discovery Party, which notice is deemed to be reasonable;

d. As necessary to implement the foregoing, the Trustee and her counsel are authorized to sign and issue a subpoena from any United States Bankruptcy Court for the applicable district in which a Discovery Party resides, does business, maintains documents or is found, both to obtain documents from such Discovery Party and to command the attendance of such Discovery Party at a deposition. The Trustee and her counsel also are authorized to take such actions as may be necessary in any other court to enforce subpoenas and otherwise effectuate the terms of this Order;

e. The Prepetition Agent and Prepetition Secured Lenders are authorized to and shall receive the documents produced in response to a subpoena by a Discovery Party and fully participate in the oral examination of a Discovery Party;

f. Nothing in this Order limits the substantive rights of any Discovery Party or other party under applicable law to object to or oppose any subpoena the Trustee might serve.

4. Except as otherwise agreed between the Trustee and any Discovery Party, all confidential documents produced to the Trustee shall be governed by the Protective Order [D.I. 111]. In these Chapter 11 Cases and any related adversary case, the Trustee and any other recipient of such confidential documents may file under seal in accordance with Local Rule 9018-1 copies of any confidential documents and any motions, briefs, pleadings, or other filings discussing or describing confidential documents or confidential information without filing a separate motion.

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5. This Court shall retain jurisdiction to resolve any disputes arising or related to this Order, including any discovery disputes that may arise between or among the parties and to interpret, implement, and enforce the provisions of this Order.

Dated: November 18th, 2024  
Wilmington, Delaware

  
JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Initial Discovery Parties**

- Byju Raveendran
- Riju Ravindran
- Divya Gokulnath
- Roshan Thomas
- Vinay Ravindra
- Jonathan Naseath
- Les Wright
- Pramod Sharma
- Cherian Thomas
- Mark Solomon
- Suren Markosian
- Kevin Donahue
- Shaji Puthalath
- Jino Joseph & Associates
- Think & Learn Private Ltd.
- Camshaft Capital Fund
- William Cameron Morton
- Voizzit Technology Private Ltd.
- Voizzit Information Technology LLC
- Rajendran Vellapalath
- Aswanit Nambarambath
- Whitehat Education Technology LLC
- Byju's Beta, Inc.
- Inspilearn LLC
- Wells Fargo Bank, NA
- First Citizens Bank, as successor by merger to Silicon Valley Bank
- Relay Financial Technologies Inc.
- Google LLC
- Salesforce, Inc.
- Slack Technologies, LLC
- Zendesk, Inc.
- Auctane, Inc. (Stamps.com)
- GoDaddy Operating Company, LLC
- CloudFlare, Inc.
- Microsoft Corp. (GitHub)

**EXHIBIT B**

**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 history of the Voizzit Information Technology LLC and the nature, extent, and geographic footprint of the Company's businesses and operations.
- 2) The ownership and organizational structure of Voizzit Information Technology LLC and any Voizzit Affiliates.
- 3) All facts and circumstances supporting any purported right, interest, or claim of Voizzit Information Technology LLC or any Voizzit Affiliate to, in, or against any Debtor or its business or assets.
- 4) Any relationships, transactions, or other connections between Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insiders, and any BYJU's Entities or BYJU's Insiders.
- 5) The transfers of the Debtor's Apps to Voizzit Technology Pvt. Ltd.'s developer account with Apple, Inc., on or around September 26, 2024 (for the Epic application) and October 14, 2024 (for the Tangible Play applications).
- 6) The transfers of funds from the Debtors' developer accounts with Apple, Inc. to the bank account of Voizzit Information Technology LLC, including but not limited to the transfers of \$1,049,044 from Epic's Apple Account and \$14,719.74 from Tangible Play's Apple Account on or around October 3, 2024.
- 7) The renaming of the Debtors' Stripe, Inc. accounts in the name of Voizzit Information Technology LLC.
- 8) Voizzit Information Technology LLC's access to the Debtors' accounts with Google, Inc. and any transactions or account changes resulting from such access.

9) Voizzit Information Technology LLC's access to the Debtors' accounts with Amazon.com, Inc. and any transactions or account changes resulting from such access.

10) Voizzit Information Technology LLC's access to the Debtors' accounts with Cloudflare, Inc. and any transactions or account changes resulting from such access.

11) Voizzit Information Technology LLC's access to the Debtors' accounts with PayPal, Inc. and any transactions or account changes resulting from such access.

12) Voizzit Information Technology LLC's access to the Debtors' accounts with Shopify Inc. and any transactions or account changes resulting from such access.

13) Voizzit Information Technology LLC's access to the Debtors' accounts with GitHub Inc. and any transactions or account changes resulting from such access.

14) The transfer of Epic's source code repositories from Epic's GitHub account to the "edunest-ep" GitHub account.

15) The transfer of Tangible Play's source code repositories from Tangible Play's GitHub account to the "edunest-tp" GitHub account.

16) Voizzit Information Technology LLC's knowledge of "edutechplus," the GitHub user that controls the "edunest-ep" and "edunest-tp" GitHub accounts.

17) Voizzit Information Technology LLC's knowledge of, participation in, and agreement to any of the events or transactions set forth in topics 5 through 15.

18) The current location of any funds or other property received by Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, as a result of the events or transactions set forth in topics 5 through 15.

19) The transfer of any funds or other property belonging to the Debtors to Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, not otherwise captured

by the events and transactions set forth in topics 5 through 15, including but not limited to: (i) the date of such transfer; (ii) all funds or property involved in such transfer; (iii) the authority under which You executed such a transfer; (iv) the current location of such funds or other property.

20) Voizzit Information Technology LLC's awareness and knowledge of the Debtors' chapter 11 cases.

21) Voizzit Information Technology LLC's awareness and knowledge of the Stay Enforcement Motion.

22) Voizzit Information Technology LLC's awareness and knowledge of the Stay Enforcement Order.

23) Voizzit Information Technology LLC's compliance with the Stay Enforcement Order.

24) Voizzit Information Technology LLC's awareness and knowledge of the November 19 TRO.

25) Voizzit Information Technology LLC's compliance with the November 19 TRO.

26) Voizzit Information Technology LLC's awareness and knowledge of the December 3 PI.

27) Voizzit Information Technology LLC's compliance with the December 3 PI.

28) Voizzit Information Technology LLC's awareness and knowledge of the December 11 TRO.

29) Voizzit Information Technology LLC's compliance with the December 11 TRO.

30) Voizzit Information Technology LLC's awareness and knowledge of the December 18 PI.

31) Voizzit Information Technology LLC's compliance with the December 18 PI.

32) The nature and extent of any consideration given by Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, in exchange for taking any assignment of any claim of any third party against, or any interest of any third party in, any Debtor or any assets of any Debtor (along with the source of any such consideration).

33) Voizzit Information Technology LLC's failure to pay the daily sanction of \$25,000, issued by the Court on January 29, 2025.

34) The source of the funds used to retain and otherwise pay for the service of Potter Anderson & Caroon LLP as counsel for Voizzit Information Technology LLC in the Debtors' chapter 11 cases.

35) The source of the funds used to retain and otherwise pay for the service of Chugh, LLP as counsel for Voizzit Information Technology LLC in the Debtors' chapter 11 cases.

36) The source of the funds used to retain and otherwise pay for the service of Cross & Simon LLC as counsel for Voizzit Information Technology LLC in the Debtors' chapter 11 cases.

37) 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.

38) The factual representations set forth in the Court filings in the chapter 11 cases by Voizzit Information Technology LLC.

39) Any instructions or authorizations Voizzit Information Technology LLC contends it received with respect to the Debtors' assets from anyone other than the Trustee.

40) Voizzit Information Technology LLC's collection and production of documents in response to the document requests set forth in Exhibit C to this Subpoena.



**EXHIBIT C**

**REQUESTS FOR PRODUCTION**

### **REQUESTS FOR PRODUCTION**

Chapter 11 Trustee Claudia Z. Springer requests that Voizzit Information Technology LLC produce all non-privileged Documents in its possession, custody, and control responsive to the below requests to her counsel at Jenner & Block LLP, 353 N. Clark Street, Chicago, Illinois 60654, Attn: Melissa Root (mroot@jenner.com) on or before February 27, 2025.

### **INSTRUCTIONS AND DEFINITIONS**

1. The definitions set forth in **Exhibit D** apply herein.
2. Each Request shall be responded to completely, separately, and fully.
3. If You object to any part of these Requests, please: (a) state each objection You assert in sufficient detail to permit the Court to determine the validity of the objection; and (b) disclose all responsive information to which your objection does not apply.
4. If You claim that all or any part of any Request is vague or ambiguous, please identify the specific language you consider vague or ambiguous and state the interpretation of the language in question you used to frame your response.
5. If You withhold information responsive to any of these Requests based upon any claim of privilege, provide a log or index that includes, at a minimum, the following information: (a) the specific privilege asserted or other particular reason you rely upon for not disclosing the information; (b) the identity of all persons having knowledge of any facts relating to the claim of non-disclosure or privilege; (c) a general description of the information withheld; (d) the identity of all persons who possess or claim to possess the information withheld; (e) the last known physical location of the information withheld; and (f) the identity of all Documents relating to the claim of non-disclosure, privilege, or other reason for not producing the information withheld.

6. In producing Documents, You are requested to produce an exact copy of the original of each Document requested together with all non-identical copies and drafts of that Document. Each Document shall be legible and bound in the same manner as the original. Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to each demand contained herein.

7. If more than one copy of a responsive Document exists, produce each copy that includes: (a) any notations or markings not on other copies, including handwritten notations or routing or filing instructions; and (b) attachments not included as part of other copies.

8. 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.

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

10. 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.

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

12. Documents not otherwise directly responsive to these Requests shall be produced if such Documents mention, discuss, refer to or explain the Documents that are called for by these Requests or if such Documents are attached to the Documents called for by these Requests and constitute routing slips, transmittal memoranda, cover letters, comments, or similar materials.

13. If any requested Documents are maintained in digital, electronic, or imaged form, production of a copy of the electronically stored information in digital, electronic, or imaged form

is hereby requested, along with any information needed to access, search, or sort electronic data or Documents.

14. Electronically stored information should be produced in accordance with the following specifications:

- (i) Form of Production. Produce electronically stored information in single page tiff format (Group IV tiff at 300 dpi) or in JPG format for Documents in color. Productions shall be made on encrypted media (e.g. CD/DVD or portable hard drive) with Opticon image load files (.OPT). TIFF/JPG image naming conventions should be limited to alphanumeric names only, with no spaces, no hyphens, and no special characters in the file name (e.g. ABCOOOOOOO1.tif). All fielded database information (including extracted metadata from electronic Documents) should be delivered in a standard Concordance load file format (.DAT). Group every 1,000 tiff images within incrementally named "IMAGES" directories; do not create a separate folder for each Document.
- (ii) Document Text. For Documents/records that were originally stored as native electronic files and which do not have redactions, produce the extracted full text (not OCR) from the body of each Document in separate Document-level text files (.txt) named for the beginning Bates number of the associated Document. Provide OCR text for Documents that do not contain searchable text (e.g. non-searchable PDFs, etc.). For Documents that were originally stored as native electronic files and which have redactions, produce the OCR text from the redacted image(s) associated with each Document. Clearly label any redacted material to show the redactions on the tiff image. Group 1,000 Document text files per incrementally named "TEXT" directories, separate from image directories. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the extracted text/OCR files.
- (iii) Native Production For Certain File Types. For files created by Excel or other spreadsheet programs, PowerPoint or other special presentation programs, database files, audio/visual files or any other file types that reasonably require viewing in their native format for a full understanding of their content and meaning, produce the files in native and tiff formats. Name the produced native file with the Bates number on the first page of the corresponding tiff production of the file / Document. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the native files. Group native files within

incrementally named "NATIVE" directories, separate from images and text directories.

- (iv) Metadata. Produce extracted metadata for each Document/record in the form of a Concordance load file (.dat), including the following fields (where applicable): bates range begin, bates range end, bates family range begin, bates family range end, e-mail subject line, file extension, original file path, file name, e-mail sent date, e-mail sent time, created date, created time, last modified date, last modified time, author, from, to, CC, BCC, custodian, source, source folder, MD5 hash value, native file path location, and confidentiality designation. Custodian, source, or source folder fields should contain information that can easily identify the location of the Document and, where applicable, the natural person in whose possession it was found.

15. In responding to each Request, state whether and to what extent any of the responsive Documents have been translated from any foreign language into English. If any responsive Document is partly or wholly in a language other than English, state whether any translation of the non-English language information exists and, if so, provide both the non-English language information and its English translation.

16. If, after conducting a reasonable investigation, a full answer cannot be provided for any Request for the production of Documents, so state and answer to the fullest extent possible, stating what responsive Documents are available, what Documents cannot be provided and why, and what efforts were made to obtain the unavailable Documents.

17. If any Document responsive to these Requests are no longer in your possession, custody, or control, identify each such Document by date, type of Document, person(s) from whom sent, person(s) to whom sent, person(s) receiving copies, a summary of its contents, and explain why the Document or Documents are no longer in your possession, custody, or control.

18. If any Document responsive to these Requests has been destroyed, describe the content of such Document, the location of any copies of such Document, the date of such destruction, the reason for such destruction, the name of the person or persons who ordered or

authorized such destruction, and the name of the person or persons who performed such destruction.

19. These Requests shall be deemed to be continuing so as to require supplemental productions if necessary to maintain the accuracy and completion of your production. If at any time after compliance with these demands you should acquire possession, custody, or control of any additional information within the scope of the demands, promptly furnish such information to the Trustee's attorneys in a supplemental response.

### **DOCUMENT REQUESTS**

1. All Communications between or among You and Your agents or representatives, on the one hand, and Think & Learn, Byju Raveendran, Riju Ravindran, Vinay Ravindra, Divya Gokulnath, Pankaj Srivastava, or any of their agents or representatives.

2. Your audited financial statements from September 2023-present.

3. Your unaudited financial statements from September 2023-present.

4. All monthly statements for Your bank accounts at Emirates Islamic Bank for the time period of April 1, 2024 through the present.

5. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning the transfer, deposit, or any other movement of funds derived from any of the Debtors or their customers.

6. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any transfer of funds between Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, on the one hand, and any BYJU's Entity or BYJU's Insider, on the other hand, including without limitation in relation to the transactions described in the *Declaration of Rajendran Vellapalath in Support of Voizzit Information Technology LLC, Voizzit Technology*

*Private Limited and Rajendran Vellapalath's Brief in Opposition to Preliminary Injunction* [Adv. No. 24-50233, Dkt. No. 25].

7. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any use of funds by Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, in relation to the business or operations of any Debtor.

8. All Documents and Communications relating to any Debtor App from April 1, 2024, to the present.

9. All Documents and Communications relating to any instructions or authorizations You, or any Voizzit Affiliate or Voizzit Insider, contend they received with respect to the Debtors' assets from any party other than the Trustee.

10. All Documents and Communications relating to any Apple Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Apple Transfer, or any Apple Account.

11. All Documents and Communications relating to any Amazon Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Amazon Transfer, or any Amazon Account.

12. All Documents and Communications relating to any Google Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Google Transfer, or any Google Account.

13. All Documents and Communications relating to any Stripe Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Stripe Transfer, or any Stripe Account.

14. All Documents and Communications relating to the transaction reflected in the below screenshot from the Stripe Account.



15. All Documents and Communications relating to any Cloudflare Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Cloudflare Transfer, or any Cloudflare Account.

16. All Documents and Communications relating to any transaction between Voizzit Information Technology LLC, or any Voizzit Affiliate or Voizzit Insider, on the one hand, and any Byju's Entity or Byju's Insider, on the other hand.

17. All Documents and Communications relating to the November 19 TRO.

18. All Documents and Communications relating to the December 3 PI.

19. All Documents and Communications relating to the December 11 TRO

20. All Documents and Communications relating to the December 18 PI.

21. All Documents and Communications relating to 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.

22. All Documents and Communications relating to the representations in Paragraph 2 of the Voizzit Response.



23. All Documents and Communications relating to the representations in Paragraph 3 of the Voizzit Response.

24. All Documents and Communications relating to the representations in Paragraph 4 of the Voizzit Response.

25. All Documents supporting Your counsel's statements on November 12, 2024, "I am now in possession of documents that purport to show a September 2023 loan from Riju Ravindran, principal at Voizzit, in the face amount of \$100 million and then a subsequent assignment of that loan from Riju Ravindran to Voizzit in December of 2023, and then a default notice and foreclosure triggered by the initiation of an Indian insolvency proceeding dated April 2024" and that "This foreclosure notice and default notice purports to be effective as against the entire stock of Epic!, Tangible Play, and seemingly all of the relevant IP. All of this happened prior to the involuntary and prior to the appointment of the trustee. So, critically, the trustee may not be administering property of the estate at this juncture and worse it may be seeking to sell it."

26. All Documents and Communications relating to Your, or any Voizzit Affiliate's or Voizzit Insider's, purported exclusive ownership and control over Epic and Tangible play on or after April 2, 2024.

27. All Communications with any director, officer, or employee of any Debtor from January 1, 2024 to the present.

28. All books and records of each Debtor.

29. All Documents and Communications relating to the representations in Paragraph 8 of the Voizzit Response.

30. All Documents and Communications related to Exhibit 1 to the Voizzit Response and its contents and the metadata for those emails.

31. All Documents and Communications with or concerning William Hailer or Rose Lake, Inc. or their respective advisors.

**EXHIBIT D**

**DEFINITIONS**

## **DEFINITIONS**

A. “Communication” includes, without limitation, all oral, written, or other exchange or transmission of information, regardless of whether made in person, by telephone, by electronic means, or by any other means including, without limitation, emails, memoranda, files, and notes.

B. “Document” includes, without limitation, any memorialization, whether written, typed, printed, photographic, recorded, or stored by any electronic or computerized form or otherwise preserved by any means, whether draft or final, and whether original or reproduced. The term “Document” includes but is not limited to correspondence, e-mails, computerized records, facsimiles, invoices, reports, papers, disks, tapes, CDs, notes, transcripts of oral conversations or statements however made, labels, paper, and forms filed with courts or other governmental bodies, notices, messages, calendar and diary entries, letters, or any other memoranda.

C. “Each” means each, every, and any.

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

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

F. “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.

G. “Apple Account” refers to any account of any Debtor with Apple, Inc.

H. “Apple Transfer” means any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Apple Account; (ii) any project or data of any Debtor from any Apple Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Apple Account.

I. “Amazon Account” refers to any account of any Debtor with Amazon, Inc..

J. “Amazon Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Amazon Account; (ii) any project or data of any Debtor from any Amazon Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Amazon Account.

K. “Cloudflare Account” refers to any account of any Debtor with Cloudflare, Inc.

L. “Cloudflare Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of any domain registration or related property or data to or from any Cloudflare Account.

M. “BYJU’s Entities” means Think & Learn Private Ltd. (d/b/a “Byju’s”) and each of its subsidiaries, including without limitation, each Debtor, Whitehat Technology LLC, Byju’s Alpha, Inc., and Byju’s Beta, Inc.

N. “BYJU’s Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of any Byju’s Entity. The Byju’s Insiders include, without limitation, Byju Ravindran, Riju Raveendran, and Vinay Ravindra.

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

P. “Debtor App” means each software application related to Epic! Creations, Inc., Tangible Play, Inc., or Neuron Fuel, Inc.

Q. “December 3 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 3, 2024, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 36.

R. “December 11 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on December 11, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 12.

S. “December 18 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 18, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 20.

T. “Google Account” refers to any account of any Debtor with Google LLC.

U. “Google Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Google Account; (ii) any project or data of any Debtor from any Google Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Google Account.

V. “November 19 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on November 19, 2024 in Adversary Proceeding No. 24-50233 at Adv. Dkt. 14.

W. “Stay Enforcement Motion” means the *Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 244] filed on November 4, 2024.

X. “Stay Enforcement Order” means the *Order Granting In Part Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 276] entered on November 12, 2024.

Y. “Stripe Account” refers to any account of any Debtor with Stripe, Inc.

Z. “Stripe Transfer” refers to any transfer or attempted transfer of funds, from June 4, 2024, to the present, from any Stripe Account.

AA. “You” and “Your” refer to Voizzit Information Technology LLC and each of its subsidiaries, agents, attorneys, employees, representatives, and others within its control.

BB. “Voizzit Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of Voizzit Information Technology LLC or any Voizzit Affiliate.

CC. “Voizzit Affiliate” refers to an entity that directly or indirectly shares common ownership with Voizzit Information Technology LLC, including but not limited to Voizzit Technology Private Ltd.

DD. “Voizzit Response” means *Voizzit Information Technology LLC, Voizzit Technology Private Limited And Rajendran Vellapalath’s Response to Order to Show Cause and Motion to Dismiss the Complaint* filed under seal on January 27, 2025, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 80.

**Exhibit D**

**(Rule 2004 Subpoena to Voizzit Technology Pvt. Ltd.)**



UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re EPIC! CREATIONS, INC., et al.  
Debtors

Case No. 24-11161 (BLS)  
Chapter 11

SUBPOENA FOR RULE 2004 EXAMINATION

To: Voizzit Technology Pvt. Ltd.

*(Name of person to whom the subpoena is directed)*

■ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at an examination under Rule 2004, Federal Rules of Bankruptcy Procedure. A copy of the court order authorizing the examination is attached.

PLACE	DATE AND TIME
Via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509)	February 28, 2025, at 8:00 a.m. (prevailing Central Time)

The examination will be recorded by this method: Stenographic and/or audio visual means.

■ **Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

All Documents and Communications responsive to the Document Requests and Interrogatories in the attached Rider.

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: February 13, 2025

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

/s/ Melissa Root  
*Attorney's signature*

The name, address, email address, and telephone number of the attorneys representing Claudia Z. Springer, as Chapter 11 Trustee, who issues or requests this subpoena, are:

Melissa Root, Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654, mroot@jenner.com, (312) 840-7255

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for *(name of individual and title, if any)*: \_\_\_\_\_ on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$\_\_\_\_\_.

My fees are \$\_\_\_\_\_ for travel and \$\_\_\_\_\_ for services, for a total of \$\_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...

(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**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 (BLS)

(Jointly Administered)

**RIDER TO RULE 2004 SUBPOENA**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”), through her undersigned counsel, in connection with the above-captioned jointly administered chapter 11 cases, and pursuant to Rules 2004, 9014, and 9016 of the Federal Rules of Bankruptcy Procedure, Rule 45 of the Federal Rules of Civil Procedure, the Local Rules of the United States Bankruptcy Court for the District of Delaware, and 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] (the “Rule 2004 Order”), a copy of which is attached hereto as **Exhibit A**, will take the deposition upon oral examination of the designated witness of Voizzit Technology Pvt. Ltd. A list of the deposition topics is set forth on **Exhibit B**.

The oral examination will take place on **February 28, 2025 at 8:00 a.m. (prevailing Central Time)** via a Zoom videoconference (accessible as follows: Meeting ID: 312 840 7257; Password: 746509) and will be held before a court reporter, and will be recorded by stenographic and/or audiovisual means. It shall continue from day to day until it has been completed.

In addition, pursuant to the Rule 2004 Order, on or before **February 27, 2025**, Voizzit Technology Pvt. Ltd. shall search for and produce all documents responsive to the requests for production set forth in **Exhibit C**.<sup>2</sup>

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<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).

<sup>2</sup> Unless otherwise defined, all capitalized terms used herein and in Exhibits B and C shall have the meaning ascribed in the list of definitions set forth in **Exhibit D**.

Wilmington, Delaware  
February 13, 2025

/s/ Melissa Root

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

Joseph C. Barsalona II  
824 North Market Street, Suite 800  
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*)  
William A. Williams (admitted *pro hac vice*)  
353 N. Clark Street  
Chicago, Illinois 60654  
Telephone: (312) 923-2952  
csteege@jenner.com  
mroot@jenner.com  
wwilliams@jenner.com

*Counsel to the Trustee*

**EXHIBIT A**

**RULE 2004 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

Case No. 24-11161 (JTD)

(Jointly Administered)

Related D.I.: 253

**ORDER GRANTING CHAPTER 11 TRUSTEE'S MOTION FOR ORDER  
AUTHORIZING THE TRUSTEE TO CONDUCT RULE 2004  
EXAMINATIONS AND TO ISSUE SUBPOENAS IN SUPPORT THEREOF**

Chapter 11 Trustee Claudia Z. Springer (the “Trustee”) has filed a motion (the “Motion”)<sup>2</sup> [D.I. 253] for an order authorizing the Trustee to issue subpoenas and conduct examinations under Federal Rule of Bankruptcy Procedure 2004; and the Court having jurisdiction to consider the Motion and the relief requested therein under 28 U.S.C. § 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(A) and (O); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and a hearing having been held on November 20, 2024 to consider the relief requested in the Motion (the “Hearing”); and upon the record of the Hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors’

<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).

<sup>2</sup> All capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

estates, creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS ORDERED THAT:**

1. The Motion is **GRANTED** as provided herein.
2. The Trustee is authorized, under Bankruptcy Rule 2004 and without further order of the Court, to demand and compel by way of subpoena: (i) the oral examination, under oath, of any Discovery Party (including, but not limited to, each Initial Discovery Party identified in **Exhibit 1** attached hereto); and (ii) the production of documents that might be relevant to the Investigation or lead the Trustee to information relevant to the Investigation. The Trustee may serve such subpoenas on any Discovery Party she subsequently identifies without needing to file a separate motion.
3. The following procedures shall apply in connection with the Trustee's issuance of any subpoena under Rule 2004:
  - a. The Trustee may serve a Rule 2004 subpoena on any Discovery Party without needing to file a separate motion. As soon as reasonably practicable thereafter, the Trustee shall file with the Court a notice of service for each subpoena served, which notice shall include the certification required by Local Rule 2004-1;
  - b. Except as otherwise agreed by the Trustee, or subsequently ordered by the Court, a Discovery Party that receives a subpoena seeking documents (whether or not it also seeks testimony) shall, within fourteen days after service of such subpoena: (i) produce all non-privileged documents responsive to such subpoena on a rolling basis at the earliest possible date (along with a privilege log describing any documents withheld on the basis of privilege containing sufficient detail to establish the nature and facial validity of such assertion); or (ii) file and serve a motion seeking a protective order, which the Court may hear on shortened notice no later than seven days from the filing of such motion (or at the Court's earliest convenience thereafter);



c. If the subpoena so directs, the Discovery Party shall appear for an oral examination within seven days of service of a deposition subpoena on the Discovery Party, which notice is deemed to be reasonable;

d. As necessary to implement the foregoing, the Trustee and her counsel are authorized to sign and issue a subpoena from any United States Bankruptcy Court for the applicable district in which a Discovery Party resides, does business, maintains documents or is found, both to obtain documents from such Discovery Party and to command the attendance of such Discovery Party at a deposition. The Trustee and her counsel also are authorized to take such actions as may be necessary in any other court to enforce subpoenas and otherwise effectuate the terms of this Order;

e. The Prepetition Agent and Prepetition Secured Lenders are authorized to and shall receive the documents produced in response to a subpoena by a Discovery Party and fully participate in the oral examination of a Discovery Party;

f. Nothing in this Order limits the substantive rights of any Discovery Party or other party under applicable law to object to or oppose any subpoena the Trustee might serve.

4. Except as otherwise agreed between the Trustee and any Discovery Party, all confidential documents produced to the Trustee shall be governed by the Protective Order [D.I. 111]. In these Chapter 11 Cases and any related adversary case, the Trustee and any other recipient of such confidential documents may file under seal in accordance with Local Rule 9018-1 copies of any confidential documents and any motions, briefs, pleadings, or other filings discussing or describing confidential documents or confidential information without filing a separate motion.

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5. This Court shall retain jurisdiction to resolve any disputes arising or related to this Order, including any discovery disputes that may arise between or among the parties and to interpret, implement, and enforce the provisions of this Order.

Dated: November 18th, 2024  
Wilmington, Delaware

  
JOHN T. DORSEY  
UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**Initial Discovery Parties**

- Byju Raveendran
- Riju Ravindran
- Divya Gokulnath
- Roshan Thomas
- Vinay Ravindra
- Jonathan Naseath
- Les Wright
- Pramod Sharma
- Cherian Thomas
- Mark Solomon
- Suren Markosian
- Kevin Donahue
- Shaji Puthalath
- Jino Joseph & Associates
- Think & Learn Private Ltd.
- Camshaft Capital Fund
- William Cameron Morton
- Voizzit Technology Private Ltd.
- Voizzit Information Technology LLC
- Rajendran Vellapalath
- Aswanit Nambarambath
- Whitehat Education Technology LLC
- Byju's Beta, Inc.
- Inspilearn LLC
- Wells Fargo Bank, NA
- First Citizens Bank, as successor by merger to Silicon Valley Bank
- Relay Financial Technologies Inc.
- Google LLC
- Salesforce, Inc.
- Slack Technologies, LLC
- Zendesk, Inc.
- Auctane, Inc. (Stamps.com)
- GoDaddy Operating Company, LLC
- CloudFlare, Inc.
- Microsoft Corp. (GitHub)

**EXHIBIT B**

**DEPOSITION TOPICS**

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

- 1) The history of Voizzit Technology Pvt. Ltd. and the nature, extent, and geographic footprint of its businesses and operations.
- 2) The ownership and organizational structure of Voizzit Technology Pvt. Ltd. and any Voizzit Affiliates.
- 3) All facts and circumstances supporting any purported right, interest, or claim of Voizzit Technology Pvt. Ltd. or any Voizzit Affiliate to, in, or against any Debtor or its business or assets.
- 4) Any relationships, transactions, or other connections between Voizzit Technology Pvt. Ltd. or any Voizzit Affiliate or Voizzit Insiders and any BYJU's Entities or BYJU's Insiders.
- 5) The transfers of the Debtor's Apps to Voizzit Technology Pvt. Ltd.'s developer account with Apple, Inc., on or around September 26, 2024 (for the Epic application) and October 14, 2024 (for the Tangible Play applications).
- 6) The transfers of funds from the Debtors' developer accounts with Apple, Inc. to the bank account of Voizzit Information Technology LLC, including but not limited to the transfers of \$1,049,044 from Epic's Apple Account and \$14,719.74 from Tangible Play's Apple Account on or around October 3, 2024.
- 7) The renaming of the Debtors' Stripe, Inc. accounts in the name of Voizzit Information Technology LLC.
- 8) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with Google, Inc. and any transactions or account changes resulting from such access.

9) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with Amazon.com, Inc. and any transactions or account changes resulting from such access.

10) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with Cloudflare, Inc. and any transactions or account changes resulting from such access.

11) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with PayPal, Inc. and any transactions or account changes resulting from such access.

12) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with Shopify Inc. and any transactions or account changes resulting from such access.

13) Voizzit Technology Pvt. Ltd.'s access to the Debtors' accounts with GitHub Inc. and any transactions or account changes resulting from such access.

14) The transfer of Epic's source code repositories from Epic's GitHub account to the "edunest-ep" GitHub account.

15) The transfer of Tangible Play's source code repositories from Tangible Play's GitHub account to the "edunest-tp" GitHub account.

16) Voizzit Technology Pvt. Ltd.'s knowledge of "edutechplus," the GitHub user that controls the "edunest-ep" and "edunest-tp" GitHub accounts.

17) Voizzit Technology Pvt. Ltd.'s knowledge of, participation in, and agreement to any of the events or transactions set forth in topics 5 through 15.

18) The current location of any funds or other property received by Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, as a result of the events or transactions set forth in topics 5 through 15.

19) The transfer of any funds or other property belonging to the Debtors to Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, not otherwise captured by the

events and transactions set forth in topics 5 through 15, including but not limited to: (i) the date of such transfer; (ii) all funds or property involved in such transfer; (iii) the authority under which such transfer was executed; (iv) the current location of such funds or other property.

20) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the Debtors' chapter 11 cases.

21) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the Stay Enforcement Motion.

22) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the Stay Enforcement Order.

23) Voizzit Technology Pvt. Ltd.'s compliance with the Stay Enforcement Order.

24) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the November 19 TRO.

25) Voizzit Technology Pvt. Ltd.'s compliance with the November 19 TRO.

26) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the December 3 PI.

27) Voizzit Technology Pvt. Ltd.'s compliance with the December 3 PI.

28) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the December 11 TRO.

29) Voizzit Technology Pvt. Ltd.'s compliance with the December 11 TRO.

30) Voizzit Technology Pvt. Ltd.'s awareness and knowledge of the December 18 PI.

31) Voizzit Technology Pvt. Ltd.'s compliance with the December 18 PI.

32) The nature and extent of any consideration given by Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, in exchange for taking any assignment of any claim of

any third party against, or any interest of any third party in, any Debtor or any assets of any Debtor (along with the source of any such consideration).

33) Voizzit Technology Pvt. Ltd.'s failure to pay the daily sanction of \$25,000, issued by the Court on January 29, 2025.

34) The source of the funds used to retain and otherwise pay for the service of Potter Anderson & Caroon LLP as counsel for Voizzit Technology Pvt. Ltd. in the Debtors' chapter 11 cases.

35) The source of the funds used to retain and otherwise pay for the service of Chugh, LLP as counsel for Voizzit Technology Pvt. Ltd. in the Debtors' chapter 11 cases.

36) The source of the funds used to retain and otherwise pay for the service of Cross & Simon LLC as counsel for Voizzit Technology Pvt. Ltd. in the Debtors' chapter 11 cases.

37) 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.

38) The factual representations set forth in the Court filings in the chapter 11 cases by Voizzit Technology Pvt. Ltd.

39) Any instructions or authorizations Voizzit Technology Pvt. Ltd. contends it received with respect to the Debtors' assets from anyone other than the Trustee.

40) Voizzit Technology Pvt. Ltd.'s collection and production of documents in response to the document requests set forth in Exhibit C to this Subpoena.



**EXHIBIT C**

**REQUESTS FOR PRODUCTION**

## REQUESTS FOR PRODUCTION

Chapter 11 Trustee Claudia Z. Springer requests that Voizzit Technology Pvt. Ltd. produce all non-privileged Documents in its possession, custody, and control responsive to the below requests to her counsel at Jenner & Block LLP, 353 N. Clark Street, Chicago, Illinois 60654, Attn: Melissa Root (mroot@jenner.com) on or before February 27, 2025.

## INSTRUCTIONS AND DEFINITIONS

1. The definitions set forth in **Exhibit D** apply herein.
2. Each Request shall be responded to completely, separately, and fully.
3. If You object to any part of these Requests, please: (a) state each objection You assert in sufficient detail to permit the Court to determine the validity of the objection; and (b) disclose all responsive information to which your objection does not apply.
4. If You claim that all or any part of any Request is vague or ambiguous, please identify the specific language you consider vague or ambiguous and state the interpretation of the language in question you used to frame your response.
5. If You withhold information responsive to any of these Requests based upon any claim of privilege, provide a log or index that includes, at a minimum, the following information: (a) the specific privilege asserted or other particular reason you rely upon for not disclosing the information; (b) the identity of all persons having knowledge of any facts relating to the claim of non-disclosure or privilege; (c) a general description of the information withheld; (d) the identity of all persons who possess or claim to possess the information withheld; (e) the last known physical location of the information withheld; and (f) the identity of all Documents relating to the claim of non-disclosure, privilege, or other reason for not producing the information withheld.

6. In producing Documents, You are requested to produce an exact copy of the original of each Document requested together with all non-identical copies and drafts of that Document. Each Document shall be legible and bound in the same manner as the original. Documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to each demand contained herein.

7. If more than one copy of a responsive Document exists, produce each copy that includes: (a) any notations or markings not on other copies, including handwritten notations or routing or filing instructions; and (b) attachments not included as part of other copies.

8. 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.

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

10. 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.

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

12. Documents not otherwise directly responsive to these Requests shall be produced if such Documents mention, discuss, refer to or explain the Documents that are called for by these Requests or if such Documents are attached to the Documents called for by these Requests and constitute routing slips, transmittal memoranda, cover letters, comments, or similar materials.

13. If any requested Documents are maintained in digital, electronic, or imaged form, production of a copy of the electronically stored information in digital, electronic, or imaged form

is hereby requested, along with any information needed to access, search, or sort electronic data or Documents.

14. Electronically stored information should be produced in accordance with the following specifications:

- (i) Form of Production. Produce electronically stored information in single page tiff format (Group IV tiff at 300 dpi) or in JPG format for Documents in color. Productions shall be made on encrypted media (e.g. CD/DVD or portable hard drive) with Opticon image load files (.OPT). TIFF/JPG image naming conventions should be limited to alphanumeric names only, with no spaces, no hyphens, and no special characters in the file name (e.g. ABCOOOOOOO1.tif). All fielded database information (including extracted metadata from electronic Documents) should be delivered in a standard Concordance load file format (.DAT). Group every 1,000 tiff images within incrementally named "IMAGES" directories; do not create a separate folder for each Document.
- (ii) Document Text. For Documents/records that were originally stored as native electronic files and which do not have redactions, produce the extracted full text (not OCR) from the body of each Document in separate Document-level text files (.txt) named for the beginning Bates number of the associated Document. Provide OCR text for Documents that do not contain searchable text (e.g. non-searchable PDFs, etc.). For Documents that were originally stored as native electronic files and which have redactions, produce the OCR text from the redacted image(s) associated with each Document. Clearly label any redacted material to show the redactions on the tiff image. Group 1,000 Document text files per incrementally named "TEXT" directories, separate from image directories. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the extracted text/OCR files.
- (iii) Native Production For Certain File Types. For files created by Excel or other spreadsheet programs, PowerPoint or other special presentation programs, database files, audio/visual files or any other file types that reasonably require viewing in their native format for a full understanding of their content and meaning, produce the files in native and tiff formats. Name the produced native file with the Bates number on the first page of the corresponding tiff production of the file / Document. A comma delimited list file (.LST) should be provided and include the beginning Bates number and the full file path (including volume) information to the native files. Group native files within

incrementally named "NATIVE" directories, separate from images and text directories.

- (iv) Metadata. Produce extracted metadata for each Document/record in the form of a Concordance load file (.dat), including the following fields (where applicable): bates range begin, bates range end, bates family range begin, bates family range end, e-mail subject line, file extension, original file path, file name, e-mail sent date, e-mail sent time, created date, created time, last modified date, last modified time, author, from, to, CC, BCC, custodian, source, source folder, MD5 hash value, native file path location, and confidentiality designation. Custodian, source, or source folder fields should contain information that can easily identify the location of the Document and, where applicable, the natural person in whose possession it was found.

15. In responding to each Request, state whether and to what extent any of the responsive Documents have been translated from any foreign language into English. If any responsive Document is partly or wholly in a language other than English, state whether any translation of the non-English language information exists and, if so, provide both the non-English language information and its English translation.

16. If, after conducting a reasonable investigation, a full answer cannot be provided for any Request for the production of Documents, so state and answer to the fullest extent possible, stating what responsive Documents are available, what Documents cannot be provided and why, and what efforts were made to obtain the unavailable Documents.

17. If any Document responsive to these Requests are no longer in your possession, custody, or control, identify each such Document by date, type of Document, person(s) from whom sent, person(s) to whom sent, person(s) receiving copies, a summary of its contents, and explain why the Document or Documents are no longer in your possession, custody, or control.

18. If any Document responsive to these Requests has been destroyed, describe the content of such Document, the location of any copies of such Document, the date of such destruction, the reason for such destruction, the name of the person or persons who ordered or

authorized such destruction, and the name of the person or persons who performed such destruction.

19. These Requests shall be deemed to be continuing so as to require supplemental productions if necessary to maintain the accuracy and completion of your production. If at any time after compliance with these demands you should acquire possession, custody, or control of any additional information within the scope of the demands, promptly furnish such information to the Trustee's attorneys in a supplemental response.

### **DOCUMENT REQUESTS**

1. All Communications between or among You and Your agents or representatives, on the one hand, and Think & Learn, Byju Raveendran, Riju Ravindran, Vinay Ravindra, Divya Gokulnath, Pankaj Srivastava, or any of their agents or representatives.

2. Your audited financial statements from September 2023-present.

3. Your unaudited financial statements from September 2023-present.

4. All monthly statements for Your bank accounts at Emirates Islamic Bank for the time period of April 1, 2024 through the present.

5. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning the transfer, deposit, or any other movement of funds derived from any of the Debtors or their customers.

6. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any transfer of funds between Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, on the one hand, and any BYJU's Entity or BYJU's Insider, on the other hand, including without limitation in relation to the transactions described in the *Declaration of Rajendran Vellapalath in Support of Voizzit Information Technology LLC, Voizzit Technology*

*Private Limited and Rajendran Vellapalath's Brief in Opposition to Preliminary Injunction* [Adv. No. 24-50233, Dkt. No. 25].

7. All bank statements, wire transfer records, checks, and other Documents reflecting or concerning any use of funds by Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, in relation to the business or operations of any Debtor.

8. All Documents and Communications relating to any Debtor App from April 1, 2024, to the present.

9. All Documents and Communications relating to any instructions or authorizations You, or any Voizzit Affiliate or Voizzit Insider, contend they received with respect to the Debtors' assets from any party other than the Trustee.

10. All Documents and Communications relating to any Apple Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Apple Transfer, or any Apple Account.

11. All Documents and Communications relating to any Amazon Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Amazon Transfer, or any Amazon Account.

12. All Documents and Communications relating to any Google Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Google Transfer, or any Google Account.

13. All Documents and Communications relating to any Stripe Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Stripe Transfer, or any Stripe Account.

14. All Documents and Communications relating to the transaction reflected in the below screenshot from the Stripe Account.



15. All Documents and Communications relating to any Cloudflare Transfer, including but not limited to, Documents and Communications identifying the persons or users who authorized, effectuated, and/or were aware of each Cloudflare Transfer, or any Cloudflare Account.

16. All Documents and Communications relating to any transaction between Voizzit Technology Pvt. Ltd., or any Voizzit Affiliate or Voizzit Insider, on the one hand, and any Byju's Entity or Byju's Insider, on the other hand.

17. All Documents and Communications relating to the November 19 TRO.

18. All Documents and Communications relating to the December 3 PI.

19. All Documents and Communications relating to the December 11 TRO

20. All Documents and Communications relating to the December 18 PI.

21. All Documents and Communications relating to 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.

22. All Documents and Communications relating to the representations in Paragraph 2 of the Voizzit Response.



23. All Documents and Communications relating to the representations in Paragraph 3 of the Voizzit Response.

24. All Documents and Communications relating to the representations in Paragraph 4 of the Voizzit Response.

25. All Documents supporting Your counsel's statements on November 12, 2024, "I am now in possession of documents that purport to show a September 2023 loan from Riju Ravindran, principal at Voizzit, in the face amount of \$100 million and then a subsequent assignment of that loan from Riju Ravindran to Voizzit in December of 2023, and then a default notice and foreclosure triggered by the initiation of an Indian insolvency proceeding dated April 2024" and that "This foreclosure notice and default notice purports to be effective as against the entire stock of Epic!, Tangible Play, and seemingly all of the relevant IP. All of this happened prior to the involuntary and prior to the appointment of the trustee. So, critically, the trustee may not be administering property of the estate at this juncture and worse it may be seeking to sell it."

26. All Documents and Communications relating to Your and/or any Voizzit Affiliate's or Voizzit Insider's purported exclusive ownership and control over Epic and Tangible play on or after April 2, 2024.

27. All Communications with any director, officer, or employee of any Debtor from January 1, 2024 to the present.

28. All books and records of each Debtor.

29. All Documents and Communications relating to the representations in Paragraph 8 of the Voizzit Response.

30. All Documents and Communications related to Exhibit 1 to the Voizzit Response and its contents and the metadata for those emails.

31. All Documents and Communications with or concerning William Hailer or Rose Lake, Inc. or their respective advisors.

**EXHIBIT D**

**DEFINITIONS**

## **DEFINITIONS**

A. “Communication” includes, without limitation, all oral, written, or other exchange or transmission of information, regardless of whether made in person, by telephone, by electronic means, or by any other means including, without limitation, emails, memoranda, files, and notes.

B. “Document” includes, without limitation, any memorialization, whether written, typed, printed, photographic, recorded, or stored by any electronic or computerized form or otherwise preserved by any means, whether draft or final, and whether original or reproduced. The term “Document” includes but is not limited to correspondence, e-mails, computerized records, facsimiles, invoices, reports, papers, disks, tapes, CDs, notes, transcripts of oral conversations or statements however made, labels, paper, and forms filed with courts or other governmental bodies, notices, messages, calendar and diary entries, letters, or any other memoranda.

C. “Each” means each, every, and any.

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

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

F. “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.

G. “Apple Account” refers to any account of any Debtor with Apple, Inc.

H. “Apple Transfer” means any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Apple Account; (ii) any project or data of any Debtor from any Apple Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Apple Account.

I. “Amazon Account” refers to any account of any Debtor with Amazon, Inc.

J. “Amazon Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Amazon Account; (ii) any project or data of any Debtor from any Amazon Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Amazon Account.

K. “Cloudflare Account” refers to any account of any Debtor with Cloudflare, Inc.

L. “Cloudflare Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of any domain registration or related property or data to or from any Cloudflare Account.

M. “BYJU’s Entities” means Think & Learn Private Ltd. (d/b/a “Byju’s”) and each of its subsidiaries, including without limitation, each Debtor, Whitehat Technology LLC, Byju’s Alpha, Inc., and Byju’s Beta, Inc.

N. “BYJU’s Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of any Byju’s Entity. The Byju’s Insiders include, without limitation, Byju Ravindran, Riju Raveendran, and Vinay Ravindra.

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

P. “Debtor App” means each software application related to Epic! Creations, Inc., Tangible Play, Inc., or Neuron Fuel, Inc.

Q. “December 3 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 3, 2024, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 36.

R. “December 11 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on December 11, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 12.

S. “December 18 PI” means the *Order Granting Chapter 11 Trustee’s Motion for a Preliminary Injunction* entered on December 18, 2024, in Adversary Proceeding No. 24-50280 at Adv. Dkt. 20.

T. “Google Account” refers to any account of any Debtor with Google LLC.

U. “Google Transfer” refers to any transfer or attempted transfer, from June 4, 2024 to the present, of: (i) the ownership of any Debtor App from any Google Account; (ii) any project or data of any Debtor from any Google Account; and/or (iii) any funds derived from or received on account of any Debtor App from any Google Account.

V. “November 19 TRO” means the *Order Granting Chapter 11 Trustee’s Motion for a Temporary Injunction* entered on November 19, 2024 in Adversary Proceeding No. 24-50233 at Adv. Dkt. 14.

W. “Stay Enforcement Motion” means the *Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 244] filed on November 4, 2024.

X. “Stay Enforcement Order” means the *Order Granting In Part Trustee’s Emergency Motion For Entry Of An Order (I) Enforcing The Automatic Stay, (II) Declaring Violations Of The Automatic Stay To Be Void Ab Initio, (III) Awarding Fees, Expenses, And Punitive Damages, And (IV) Granting Related Relief* [Bankr. D.I. 276] entered on November 12, 2024.

Y. “Stripe Account” refers to any account of any Debtor with Stripe, Inc.

Z. “Stripe Transfer” refers to any transfer or attempted transfer of funds, from June 4, 2024, to the present, from any Stripe Account.

AA. “You” and “Your” refer to Voizzit Technology Pvt. Ltd. and each of its subsidiaries, agents, attorneys, employees, representatives, and others within its control.

BB. “Voizzit Insider” means each officer, director, manager, employee, equityholder, or beneficial owner of Voizzit Technology Pvt. Ltd. or any Voizzit Affiliate.

CC. “Voizzit Affiliate” refers to an entity that directly or indirectly shares common ownership with Voizzit Technology Pvt. Ltd., including but not limited to Voizzit Information Technology LLC.

DD. “Voizzit Response” means *Voizzit Information Technology LLC, Voizzit Technology Private Limited and Rajendran Vellapalath’s Response to Order to Show Cause and Motion to Dismiss the Complaint* filed under seal on January 27, 2025, in Adversary Proceeding No. 24-50233 at Adv. Dkt. 80.

**Exhibit E**  
**(February 2025 Email Correspondence)**



---

**From:** Maureen Abbey Scorese <Maureen.scorese@chugh.com>  
**Sent:** Thursday, February 27, 2025 10:55 AM  
**To:** Steege, Catherine L.; Williams, William A.; Prateek Tiwari  
**Cc:** Root, Melissa M.; Epic; Kevin Mann  
**Subject:** RE: In re Epic! Creations, Inc. et al., Case No. 24-11161 (Bankr. D. Del.)

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Thank you.

Kind regards,



**Maureen Abbey Scorese**  
Senior Attorney

295 Pierson Avenue, Suite 201, Edison, NJ 08837  
Main: 732.205.8600 | Direct: 732.662.5933 | Fax: 732-205-8601  
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**From:** Steege, Catherine L. <CSteege@jenner.com>  
**Sent:** Thursday, February 27, 2025 11:50 AM  
**To:** Maureen Abbey Scorese <Maureen.scorese@chugh.com>; Williams, William A. <WWilliams@jenner.com>; Prateek Tiwari <Prateek.tiwari@chugh.com>  
**Cc:** Root, Melissa M. <MRoot@Jenner.com>; Epic <epic@pashmanstein.com>; Kevin Mann <kmann@crosslaw.com>  
**Subject:** RE: In re Epic! Creations, Inc. et al., Case No. 24-11161 (Bankr. D. Del.)

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---

Maureen, Monday is fine. Cathy

---

**From:** Maureen Abbey Scorese <[Maureen.scorese@chugh.com](mailto:Maureen.scorese@chugh.com)>  
**Sent:** Thursday, February 27, 2025 10:27 AM  
**To:** Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>; Prateek Tiwari <[Prateek.tiwari@chugh.com](mailto:Prateek.tiwari@chugh.com)>  
**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>; Kevin Mann <[kmann@crosslaw.com](mailto:kmann@crosslaw.com)>  
**Subject:** RE: In re Epic! Creations, Inc. et al., Case No. 24-11161 (Bankr. D. Del.)  
**Importance:** High

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Counsel,

We are working to determine the status of our representation with our clients. Accordingly, I am writing to request an extension of time through Monday, to provide responses to the attached Rule 2004 Notices.

Please confirm at your earliest convenience.

**Please also ensure that our local counsel, Kevin Mann, is included on all communications. Thank you.**

Kind regards,



**Maureen Abbey Scorese**  
Senior Attorney

295 Pierson Avenue, Suite 201, Edison, NJ 08837  
Main: 732.205.8600 | Direct: 732.662.5933 | Fax: 732-205-8601

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**From:** Williams, William A. <[WWilliams@jenner.com](mailto:WWilliams@jenner.com)>

**Sent:** Thursday, February 13, 2025 7:05 PM

**To:** Maureen Abbey Scorese <[Maureen.scorese@chugh.com](mailto:Maureen.scorese@chugh.com)>; Ethan Chen <[ethan.chen@chugh.com](mailto:ethan.chen@chugh.com)>; Prateek Tiwari <[Prateek.tiwari@chugh.com](mailto:Prateek.tiwari@chugh.com)>

**Cc:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>; Root, Melissa M. <[MRoot@Jenner.com](mailto:MRoot@Jenner.com)>; Epic <[epic@pashmanstein.com](mailto:epic@pashmanstein.com)>

**Subject:** In re Epic! Creations, Inc. et al., Case No. 24-11161 (Bankr. D. Del.)

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Counsel,

Please accept service of the attached Rule 2004 subpoenas issued by Chapter 11 Trustee Claudia Springer to your clients Voizzit Information Technology LLC, Voizzit Technology Pvt. Ltd., and Rajendran Vellapalath in relation to the above-referenced chapter 11 cases.

Thanks,  
Bill

---

**William A Williams**

**Jenner & Block LLP**

353 North Clark Street  
Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)

+1 312 840 7257 | Tel  
+1 312 825 5186 | Mobile

[WWilliams@jenner.com](mailto:WWilliams@jenner.com)  
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**Exhibit F**

**(March 11-13, 2025 Email Correspondence)**

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**From:** Steege, Catherine L.  
**Sent:** Thursday, March 13, 2025 7:50 AM  
**To:** Maureen Abbey Scorese  
**Subject:** RE: In re Epic

Maureen,

Can we speak this morning at 9:30 your time regarding this matter? If that does not work, please suggest a time today that does work for you after 1 p.m. your time. Thank you.

Cathy

---

**From:** Maureen Abbey Scorese <Maureen.scorese@chugh.com>  
**Sent:** Thursday, March 13, 2025 6:03 AM  
**To:** Steege, Catherine L. <CSteege@jenner.com>  
**Subject:** Re: In re Epic

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—  
Cathy,

We would request some additional time, until next Tuesday, to provide you with an answer. The client is slower to respond, as our paths in strategy have diverged.

Kind regards,  
Maureen

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---

**From:** Steege, Catherine L. <[CSteege@jenner.com](mailto:CSteege@jenner.com)>  
**Sent:** Tuesday, March 11, 2025 9:33:50 AM  
**To:** Maureen Abbey Scorese <[Maureen.scorese@chugh.com](mailto:Maureen.scorese@chugh.com)>  
**Subject:** In re Epic

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Maureen,

Although you have filed a motion to withdraw, at this point you are still counsel to the Voizzit parties. We served you with discovery and the answer date has come and gone. Are your clients going to respond to our discovery? I am happy to discuss this with you, but given the representations you made on their behalf to the court that they would answer discovery if given adequate time to do so and they were given that time with this latest request, I would ask that you please either provide the discovery or confirm that once again your clients have instructed counsel to ignore a lawful court process. Thank you.

Cathy

---

**Catherine L. Steege**

**Jenner & Block LLP**

353 N. Clark Street

Chicago, IL 60654-3456 | [jenner.com](http://jenner.com)

+1 312 923 2952 | Tel

+1 312 206 7091 | Mobile

[CSteege@jenner.com](mailto:CSteege@jenner.com)

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**Exhibit G**

**(March 14, 2025 Email Correspondence)**

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**From:** Steege, Catherine L.  
**Sent:** Friday, March 14, 2025 9:54 AM  
**To:** Maureen Abbey Scorese  
**Subject:** In re Epic Creations

Maureen,

As we discussed this morning, the Trustee's intent is to file a motion asking the Court to bar Mr. Vellapalath and the two Voizzit companies from appearing on any matters in the case until such time as they response to the outstanding Rule 2004 discovery. I asked you whether your clients intended to answer the discovery and sit for examinations. You stated that while you have been trying to obtain their compliance, at this point, you did not have authority to respond to the Rule 2004 discovery. If something changes, please let me know.

Cathy