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* ADMITTED IN DELAWARE AND NEW JERSEY

March 25, 2025

BY CM/ECF AND HAND DELIVERY

The Honorable Brendan L. Shannon
United States Bankruptcy Court
For the District of Delaware
824 N. Market Street, 3rd Floor
Wilmington, DE 19801

Re: Epic! Creations, Inc., et al.
Bankr. D. Del. Case No. 24-11161 (BLS)

Dear Judge Shannon,

This firm is counsel to Voizzit Information Technology, LLC, Voizzit Technology Private Limited, and Rajendran Vellapalath (collectively, the “Voizzit Defendants”) in the above-referenced Chapter 11 case, as well as two related adversary cases.

On March 5, 2025, we jointly filed a motion to withdraw as counsel with our co-counsel from Chugh LLP as the attorney-client relationship has broken down to such a degree that we can no longer represent the Voizzit Defendants consistent with our obligations to both the Court and the Voizzit Defendants as required under the Delaware Lawyer’s Rules of Professional Conduct. *See* Docket No. 551.

Subsequently, on March 17, 2025, Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee of the Estates of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. filed a motion to compel the Voizzit Defendants to comply with certain Rule 2004 subpoenas (the “Motion to Compel”). *See* Docket No. 570.

We have provided the Voizzit Defendants with copies of all discovery requests and subpoenas that we have received, as well as a copy of the Motion to Compel. Since the filing of the Motion to Compel, we have not been able to reach the Voizzit Defendants and they have not responded to repeated requests for comment. Thus, we do not intend to respond to the Motion to Compel on their behalf.



THE HONORABLE BRENDAN L. SHANNON
MARCH 25, 2025
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Counsel is available should the Court have any questions.

Respectfully,

/s/ Kevin S. Mann

Kevin S. Mann (No. 4576)