

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

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

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re D.I. 567

**CERTIFICATE OF NO OBJECTION REGARDING CHAPTER 11
TRUSTEE’S MOTION FOR AN ORDER AUTHORIZING THE ASSUMPTION
AND ASSIGNMENT OF TANGIBLE PLAY LEASE AND GUARANTY AGREEMENT**

The undersigned hereby certifies that, as of the date hereof, Pashman Stein Walder Hayden, P.C. (“Pashman”) has received no answer, objection or other responsive pleading to the *Chapter 11 Trustee’s Motion for an Order Authorizing the Assumption and Assignment of Tangible Play Lease and Guaranty Agreement* (the “Motion”) [D.I. 567] filed on March 17, 2025.

Pursuant to the Notice of Motion, responses to the Motion were to be filed and served no later than March 24, 2025, at 4:00 p.m. (ET). The undersigned further certifies that Pashman has caused a review of the Court’s docket in these Chapter 11 Cases and that no answer, objection or other responsive pleading to the Motion appears thereon.

WHEREFORE, the Trustee respectfully requests that the Order attached to the Motion as **Exhibit A** be entered at the earliest convenience of the Court.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).



Dated: March 25, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale

Henry J. Jaffe (No. 2987)
Joseph C. Barsalona II (No. 6102)
Alexis R. Gambale (No. 7150)
824 N. Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 592-6496
Email: hjaffe@pashmanstein.com
jbarsalona@pashmanstein.com
agambale@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
Email: csteege@jenner.com
mroot@jenner.com
wwilliams@jenner.com

Co-counsel to the Trustee