

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. 570

**CERTIFICATE OF NO OBJECTION REGARDING 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 THE CASE
UNTIL THE VOIZZIT PARTIES COMPLY WITH THE OUTSTANDING SUBPOENAS**

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 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 the Case Until the Voizzit Parties Comply with the Outstanding Subpoenas* (the “Motion”) [D.I. 570] 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.²

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).

² Kevin Mann, of Cross and Simon LLC, filed the *Letter to The Honorable Brendan L. Shannon from Kevin S. Mann, Esq. regarding Chapter 11 Trustee’s Motion to Compel filed on March 17, 2025* [D.I. 592, filed 03/25/2025] (the “Letter”). The Letter does not object to the relief sought in the Motion instead provides:



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

Dated: March 25, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale
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Co-counsel to the Trustee

“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.” See Letter, pg. 1.