

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

In re: EPIC! CREATIONS, INC., <i>et al.</i> , Debtors.	Chapter 11 Case No. 24-11161 (BLS) (Jointly Administered) Re: Docket No. 551
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google LLC, VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (BLS) Re: Adv. Docket No. 104
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Think and Learn Pvt. Ltd., and, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24- 50280 (BLS) Re: Adv. Docket No. 26

**CERTIFICATION OF COUNSEL REGARDING
MOTION TO WITHDRAW AS COUNSEL**

The undersigned hereby certifies as follows:

1. On March 5, 2025, Kevin S. Mann, Cross & Simon, LLC, Maureen V. Abbey Scorese, and Chugh LLP (collectively "Counsel") filed the *Motion to Withdraw as Counsel* (the "Motion"), with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") in each of the above-captioned cases.



24111612503260000000000008

2. Pursuant to the notice filed with the Motion, responses and objections were due on or before March 19, 2025 at 4:00 p.m. (the “Objection Deadline”). Prior to the Objection Deadline, Claudia Z. Springer, Esq. (the “Trustee”), in her capacity as Chapter 11 Trustee of the Estates of Epic! Creations, Inc., Neuron Fuel, Inc., and Tangible Play, Inc. filed the Chapter 11 Trustee’s Limited Objection to Motion to Withdraw as Counsel for the Voizzit Parties (the “Objection”).

3. The Objection requested that Counsel remain as counsel in the cases until the Court ruled on 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* [Docket No. 570] (the “Motion to Compel”). As no parties have objected to the Trustee’s Motion to Compel, she has filed a Certificate of No Objection [Docket No. 595]. As such, the Trustee’s Objection is moot.

4. The Trustee’s counsel has confirmed that the Objection has been resolved and that there is no need for a hearing on the Motion. As such, Counsel respectfully requests that the Court grant the relief requested in the Motion and enter an Order substantially in the form that was filed with the Motion, a copy of which is attached hereto as Exhibit 1.

5. Counsel is available if the Court has any questions or concerns.

Dated: March 26, 2025
Wilmington, Delaware

/s/ Kevin S. Mann
Kevin S. Mann (No. 4576)
CROSS & SIMON, LLC
1105 North Market Street, Suite 901
Wilmington, Delaware 19801
(302) 777-4200
kmann@crosslaw.com

Exhibit 1

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

<p>In re:</p> <p>EPIC! CREATIONS, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11 Case No. 24-11161 (BLS) (Jointly Administered)</p> <p>Re: Docket No. 551</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Google LLC, VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24-50233 (BLS)</p> <p>Re: Adv. Docket No. 104</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>VOIZZIT Technology Private Ltd., VOIZZIT Information Technology LLC, Think and Learn Pvt. Ltd., and, Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24- 50280 (BLS)</p> <p>Re: Adv. Docket No. 26</p>

ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL

Upon consideration of the motion of Kevin S. Mann, Cross & Simon, LLC, Maureen V. Abbey Scorese, and Chugh LLP (collectively “Counsel”), for leave to withdraw as counsel for VOIZZIT Information Technology, LLC, VOIZZIT Technology Private Limited, and Rajendran Vellapalath (collectively, the “VOIZZIT Defendants”), in the above-captioned cases and any responses therefore,

IT IS HEREBY ORDERED, the Motion is GRANTED.