

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

In re:

EPIC! CREATIONS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

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)

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)

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).



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**NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON MARCH 31, 2025 AT 10:00 A.M. (ET)**

***AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THE
HEARING HAS BEEN CANCELLED WITH PERMISSION FROM THE COURT***

RESOLVED MATTERS:

1. Motion to Withdraw as Counsel [[D.I. 551](#), filed 03/05/2025]²

Objection Deadline: March 19, 2025 at 4:00 p.m. (ET).

Responses Received:

- A. Chapter 11 Trustee's Limited Objection to Motion to Withdraw as Counsel for the Voizzit Parties [[D.I. 573](#), filed 03/19/2025]

Related Documents:

- A. Certification of Counsel Regarding Motion to Withdraw as Counsel [[D.I. 596](#), filed 03/26/2025]³
- B. Order Granting Motion to Withdraw as Counsel [[D.I. 599](#), filed 03/26/2025]

Status: The Court entered the order. No hearing is necessary.

2. Chapter 11 Trustee's Motion for an Order Authorizing the Assumption and Assignment of Tangible Play Lease and Guaranty Agreement [[D.I. 567](#), filed 03/17/2025]

Objection Deadline: March 24, 2025 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. 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 [[D.I. 594](#), filed 03/25/2025]
- B. Order Authorizing the Assumption and Assignment of Tangible Play Lease and Guaranty Agreement [[D.I. 597](#), filed 03/26/2025]

² This motion was also filed in Adv. Pro. No. 24-50233 (BLS), [D.I. 104](#) and 24-50280 (BLS), [D.I. 26](#).

³ This certification of counsel was also filed in Adv. Pro. No. 24-50233 (BLS), [D.I. 106](#) and 24-50280 (BLS), [D.I. 28](#).

Status: The Court entered the order. No hearing is necessary.

3. 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 [[D.I. 570](#), filed 03/17/2025]

Objection Deadline: March 24, 2025 at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- A. 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]
- B. Certificate of No Objection Regarding the Regarding 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 [[D.I. 595](#), filed 03/25/2025]
- C. 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 the Case Until the Voizzit Parties Comply with the Outstanding Subpoenas [[D.I. 598](#), filed 03/26/2025]

Status: The Court entered the order. No hearing is necessary.

ADJOURNED MATTERS:

4. Chapter 11 Trustee's Motion for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of All of Substantially All of the Debtors Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [[D.I. 433](#), filed 01/07/2025]

Post-Auction Objection Deadline: TBD.

Responses/Objection Deadline For First Assumption List: February 25, 2025 at 4:00 p.m. (ET). The objection deadline was extended until March 4, 2025 at 11:59 p.m. (ET) for National Geographic. The objection deadline was further extended until March 11, 2025 at

11:59 p.m. (ET). The objection deadline was extended until March 7, 2025 at 11:59 p.m. (ET) for Geodis.

Responses/Objection Deadline For Second Assumption List: March 24, 2025 at 4:00 p.m. (ET). The objection deadline was extended until March 31, 2025 at 4:00 p.m. (ET) for Avalara, Inc. The objection deadline was further extended until April 7, 2025 at 11:59 p.m. (ET) for Avalara Inc.

Related Documents:

- A. Order (I) Approving Bid Procedures in Connection with the Sale of All or Substantially All of the Debtors' Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [[D.I. 474](#), filed 01/28/2025]
- B. Notice of Bid Procedures, Auctions, and Deadlines Relating to the Sale of All or Substantially All of the Assets of the Debtors [[D.I. 489](#), filed 02/03/2025]
- C. Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction ("First Assumption List") [[D.I. 510](#), filed 02/11/2025]
- D. Affidavit of Publication of the Notice of Bid Procedures, Auctions, and Deadlines Relating to the Sale of All or Substantially All of the Assets of the Debtors [[D.I. 518](#), filed 02/14/2025]
- E. Second Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction (the "Second Assumption List") [[D.I. 560](#), filed 03/12/2025]
- F. Notice of Revised Sale Deadlines [[D.I. 581](#), filed 03/20/2025]

Cure Responses Received: See **Exhibit A** attached hereto.

Sale Responses Received: See **Exhibit B** attached hereto.

Status: The matter is adjourned until April 30, 2025.

Dated: March 27, 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

Cure Responses

Exhibit A**Cure Responses¹**

FORMAL RESPONSES RECEIVED			
	Re. D.I.	Objecting Party	Status
1.	D.I. 533 , filed 02/24/2025	Ad Hoc Group of Publishers	Resolved with updated cure amount.
2.	D.I. 536 , filed 02/24/2025	Aeronet Worldwide, Inc.	Resolved with updated cure amount.
3.	D.I. 537 , filed 02/25/2025	Moduslink Corporation	Resolved with updated cure amount.
4.	D.I. 582 , filed 03/21/2025	Google, LLC	Adjourned to the April 30, 2025 Sale Hearing.

INFORMAL RESPONSES RECEIVED		
	Objecting Party	Status
5.	Thomas Jeunesse	Resolved with updated cure amount.
6.	Wisconsin Historical Society Press	Resolved with updated cure amount.
7.	National Geographic	Resolved with updated cure amount.
8.	What on Earth Publishing	Resolved with updated cure amount.
9.	Avalara, Inc.	Objection deadline extended to April 7, 2025.

¹

The Debtors have endeavored to list each, and every applicable response received to date. However, given the number of responses received, the Debtors may have inadvertently omitted one or more responses. This chart is intended to assist the Court and parties in interest list. Nothing herein is intended to, or shall, prejudice the rights of the any party to the extent that such party has timely filed a response, which is later determined to have been inadvertently omitted.

EXHIBIT B

Sale Responses

Exhibit B**Adequate Assurance/Sale Objections¹**

FORMAL RESPONSES RECEIVED			
	Re. D.I.	Objecting Party	Status
1.	D.I. 583 ; 03/21/2025	Stripe, Inc.	Adjourned to the April 30, 2025 Sale Hearing.

¹ The Debtors have endeavored to list each and every applicable responses received to date. However, given the number of responses received, the Debtors may have inadvertently omitted one or more responses. This chart is intended to assist the Court and parties in interest list. Nothing herein is intended to, or shall, prejudice the rights of the any party to the extent that such party has timely filed a response, which is later determined to have been inadvertently omitted.