

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)

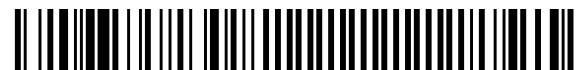
Obj. Deadline: April 22, 2025 at 4:00 p.m. ET
Hearing Date: April. 30, 2025 at 11:00 a.m. ET

**SUPPLEMENT TO SECOND INTERIM FEE
APPLICATION OF LAW OFFICES OF PANAG & BABU**

The Law Offices of Panag & Babu (“P&B”), Indian local counsel to Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, collectively the “Debtors”), hereby supplements the *Notice of Certain Trustee’s Professionals’ Second Interim Fee Applications for the Period December 4, 2024, through and including February 28, 2025* [D.I. 605] (the “Second Interim Application”) for the period from *December 1, 2024* through February 28, 2025 (the “Application Period”) by attaching, as Exhibits A through B hereto, certain schedules requested by the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases* (the “UST Guidelines”). In addition, P&B respectfully states as follows to address the questions set forth under section C.5 of the UST Guidelines:

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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- a. During the Application Period, P&B did not agree to any variations from, or alternatives to, its standard or customary billing rates, fees, or terms.
- b. The fees sought by P&B in the Second Interim Application are not more than 10% higher than the fees budgeted in the budget provided by P&B to the Debtor for the Application Period.
- c. The professionals included in the Second Interim Application did not vary their hourly rate based on the geographic location of the bankruptcy cases.
- d. The Second Interim Application did not include any fees dedicated to revising time records or preparing and revising invoices that would not normally be compensable outside of bankruptcy.
- e. The time period covered by the Second Interim Application includes approximately 0.00 hours with a value of \$0.00 spent by P&B to ensure that the time entries subject to the Second Interim Application comply with the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and do not disclose privileged or confidential information.
- f. The Second Interim Application does include any rate increases from January 2025.

Respectfully submitted this 1 day of April 2025.

THE LAW OFFICES OF PANAG & BABU

/s/ Samudra Sarangi

Samudra Sarangi

82, Okhla Industrial Estate III, New Delhi - 110020

Indian Local Counsel to the Trustee

EXHIBIT A**CUSTOMARY AND COMPARABLE
COMPENSATION DISCLOSURES**

P&B hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, P&B hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters in the U.S. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section are set forth below. Also included below is 2024/2025 blended hourly rate information for all sections of the Firm.

December 1, 2024 through December 31, 2024

Category of Timekeeper (using categories already maintained by the firm)	Blended Hourly Rate	
	Billed or Collected Firm or offices (U.S.) for preceding year excluding bankruptcy	Billed This Application (incorporating the 10% discount, but billing travel at 100%)
Senior Partner	\$575.00	\$525.00
Partner	\$525.00	\$475.00
Senior Associate	\$300.00	\$275.00
Associate	\$200.00	\$175.00
All Timekeepers Aggregate	\$400.00	\$362.50

January 1, 2025 through February 28, 2025

Category of Timekeeper (using categories already maintained by the firm)	Blended Hourly Rate	
	Billed or Collected Firm or offices (U.S.) for preceding year excluding bankruptcy	Billed This Application (incorporating the 10% discount, but billing travel at 100%)
Senior Partner	\$640.00	\$575.00
Partner	\$575.00	\$525.00
Senior Associate	\$330.00	\$300.00
Associate	\$225.00	\$200.00
All Timekeepers Aggregate	\$442.50	\$400.00

EXHIBIT B

**SUMMARY OF TIMEKEEPERS INCLUDED IN THE
SECOND INTERIM APPLICATION¹
December 1, 2024 through December 31, 2024**

Name	Title	Fees Billed in the Application Period	Hours Billed in the Application Period	Hourly Rate in the Application Period
Samudra Sarangi	Senior Partner	\$20,685.00	39.40	\$525.00
Sherbir Panag	Senior Partner	\$2,887.50	5.50	\$525.00
Jaskaran Bhullar	Partner	\$7,410.00	15.60	\$475.00
Ishita Parashar	Senior Associate	\$5,950.00	23.80	\$250.00
Saloni Jain	Senior Associate	\$5,400.00	21.60	\$250.00
Yoshita Sood	Associate	\$7,000.00	40.00	\$175.00
Priyal Sarawagi	Associate	\$4,655.00	26.60	\$175.00
Tanay Chaturvedi	Associate	\$875.00	5.00	\$175.00
Total		\$54,862.50	177.50	

January 1, 2025 through January 31, 2025

Name	Title	Fees Billed in the Application Period	Hours Billed in the Application Period	Hourly Rate in the Application Period
Samudra Sarangi	Senior Partner	\$9,487.50	16.50	\$575.00
Sherbir Panag	Senior Partner	\$1,265.00	2.20	\$575.00
Jaskaran Bhullar	Partner	\$3,517.50	6.70	\$525.00
Ishita Parashar	Senior Associate	\$1,540.00	5.60	\$275.00
Saloni Jain	Senior Associate	\$5,252.50	19.10	\$275.00
		\$4,675.00	34.00	\$137.50
Yoshita Sood	Associate	\$4,231.50	21.70	\$195.00
		\$2,925.00	30.00	\$97.50
Priyal Sarawagi	Associate	\$331.50	1.70	\$195.00
Tanay Chaturvedi	Associate	\$760.50	27.90	\$195.00
Total		\$38,666.00	165.40	

February 1, 2025 through February 28, 2025

Name	Title	Fees Billed in the Application Period	Hours Billed in the Application Period	Hourly Rate in the Application Period
Samudra Sarangi	Senior Partner	\$3,507.50	6.10	\$575.00
Sherbir Panag	Senior Partner	\$287.50	0.50	\$575.00
Jaskaran Bhullar	Partner	\$2,047.50	3.90	\$525.00
Ishita Parashar	Senior Associate	\$1,650.00	6.00	\$275.00
Saloni Jain	Senior Associate	\$192.50	0.70	\$275.00
Yoshita Sood	Associate	\$8,034.00	41.20	\$195.00
		\$1,170.00	12.00	\$97.50

Priyal Sarawagi	Associate	\$2,437.50	12.50	\$195.00
		\$1,170.00	12.00	\$97.50
Tanay Chaturvedi	Associate	\$760.50	3.90	\$195.00
Total		\$21,257.00	98.80	

¹ Fees and travel are billed at 100% in Exhibit B.

EXHIBIT C**BUDGET AND STAFFING PLAN**

A budget was not prepared in this case. P&B continues to work the Trustee to ensure efficient and cost-effective service to the estates.

BUDGET		
Project Category	Estimated Hours	Estimated Fees
Case Administration		
General Bankruptcy Advice/Opinions		
Total		

STAFFING PLAN		
Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter During the Budgeted Period	Rate
Senior Partner		
Partner		
Senior Associate		
Associate		

EXHIBIT D**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENTS****December 1, 2024 through December 31, 2024**

SUMMARY OF COMPENSATION BY PROJECT CATEGORY			
Project Category	Hours Billed	Fees Sought	Fees with 10% Discount
Business Operations	55.10	\$21,765.00	\$19,588.50
General Bankruptcy Advice/Opinions	122.40	\$33,097.50	\$29,787.75
Total	177.50	\$54,376.50	\$49,376.25

January 1, 2025 through January 31, 2025

SUMMARY OF COMPENSATION BY PROJECT CATEGORY			
Project Category	Hours Billed	Fees Sought	Fees with 10% Discount
Fee/Employment Application	14.50	\$6,322.50	\$5,690.25
Non-Working Travel Time	64.00	\$7,600.00	\$6,840.00
Claim Administration and Objections	52.00	\$11,308.00	\$10,177.20
General Bankruptcy Advice/Opinions	28.50	\$12,003.50	\$10,803.15
Trial and Hearing Attendance	6.40	\$1,432.00	\$1,288.80
Total	165.40	\$38,666.00	\$34,799.40

February 1, 2025 through February 28, 2025

SUMMARY OF COMPENSATION BY PROJECT CATEGORY			
Project Category	Hours Billed	Fees Sought	Fees with 10% Discount
Fee/Employment Application	9.80	\$3,670.00	\$3,303.00
Non-Working Travel Time	24.00	\$2,340.00	\$2,106.00
General Bankruptcy Advice/Opinions	58.00	\$13,882.00	\$12,493.80
Trial and Hearing Attendance	7.00	\$1,365.00	\$1,228.50
Total	98.80	\$21,257.00	\$19,131.30

EXHIBIT E
EXPENSES

December 1, 2024 through January 31, 2025

EXPENSE	AMOUNT
Flight Ticket	INR 291,827.00
Hotel Accommodation	INR 26,616.00
Local Transportation	INR 55,224.00
Total	INR 3,73,667.00
Total	\$4,370.40

February 1, 2025 through February 28, 2025

EXPENSE	AMOUNT
Flight Ticket	INR 67,028.00
Hotel Accommodation	INR 26,616.00
Local Transportation	INR 16,188.00
Total	INR 1,09,832.00
Total	\$1,277.10

EXHIBIT F

SUMMARY OF SECOND INTERIM APPLICATION	
Name of Applicant	Law Offices of Panag & Babu
Name of Client	Epic! Creations, Inc.
Time period covered by Second Interim Application	December 1, 2024, through February 28, 2025
Total compensation sought during the Application Period (December 1, 2024 through February 28, 2025)	\$103,306.95.00
Total expenses sought during the Application Period (December 1, 2024 through February 28, 2025)	\$5,647.50
Petition Date	October 14, 2024
Retention Date	<i>Nunc Pro Tunc to October 14, 2024</i>
Date of order approving employment	December 4, 2024
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date (at the time of filing this Second Interim Application)	\$0.00
Total allowed expenses paid to date (at the time of filing this Second Interim Application)	\$0.00
Blended rate in the Second Interim Application for all attorneys	\$259.87
Blended rate in the Second Interim Application for all timekeepers	\$442.50
Compensation sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$103,392.00
Expenses sought in the Second Interim Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed	\$0.00
Number of professionals included in the Second Interim Application	10
If applicable, number of professionals in the Second Interim Application not included in staffing plan approved by client	NA
If applicable, difference between fees budgeted and compensation sought during the Application Period	NA

Number of professionals billing fewer than 15 hours to the case during the Application Period	1
Are any rates higher than those approved or disclosed at retention?	No