

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Saga Formations, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re D.I. 919

**CERTIFICATE OF COUNSEL REGARDING ORDER APPROVING THIRD  
APPLICATION OF CLAUDIA Z. SPRINGER, CHAPTER 11 TRUSTEE, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR  
THE PERIOD MAY 1, 2025, THROUGH AND INCLUDING AUGUST 31, 2025**

The undersigned counsel to Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) Saga Formations, Inc. f/k/a Epic! Creations, Inc. (“Saga”), Pajeau, Inc. f/k/a Neuron Fuel, Inc. (“Pajeau”), and Tangible Play, Inc. (“Tangible Play,” together with Saga and Pajeau, collectively the “Debtors”) hereby certifies as follows:

1. On September 5, 2025, the Trustee filed the *Third Application of Claudia Z. Springer, Chapter 11 Trustee, for Allowance of Compensation and Reimbursement of All Actual and Necessary Expenses Incurred for the Period May 1, 2025 Through and Including August 31, 2025* [D.I. 919] (the “Application”).

2. Pursuant to the Notice of Application, objections or responses to the Application were to be filed and served no later than September 26, 2025, at 4:00 p.m. (ET) (the “Objection Deadline”)<sup>2</sup>. To the best of the undersigned’s knowledge, information and belief, neither the

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).

<sup>2</sup> The objection deadline was extended for the Office of the United States Trustee (the “U.S. Trustee”). The U.S. Trustee has confirmed as of the date of this filing that it has no objection to the Application.



Trustee nor the undersigned received any formal responses or objections to the Application by the Objection Deadline.

**WHEREFORE**, the Trustee respectfully requests that the Court enter the Proposed Order substantially in the form attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: September 29, 2025  
Wilmington, Delaware

**PASHMAN STEIN WALDER HAYDEN, P.C.**

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-and-

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*Co-counsel to the Trustee*

**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
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Chapter 11

Case No. 24-11161 (BLS)

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**ORDER APPROVING THIRD APPLICATION OF  
CLAUDIA Z. SPRINGER, CHAPTER 11 TRUSTEE,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE  
PERIOD MAY 1, 2025, THROUGH AND INCLUDING AUGUST 31, 2025**

Upon consideration of the Application of Claudia Z. Springer (the “Trustee”), pursuant to 11 U.S.C. § 330(a)(1)(B) and Bankruptcy Rule 2016(a), for reimbursement of actual, necessary expenses incurred by the Trustee for the period May 1, 2025 through and including August 31, 2025, in the above-captioned Debtors; and the Court having thoroughly reviewed the Application; and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, that notice of the Application, and any hearing thereon, was adequate under the circumstances, and that the expenses incurred by the Trustee were reasonable and necessary; and after due deliberation and sufficient good cause appearing therefor, it is hereby **ORDERED** that:

1. The Application is **GRANTED** as set forth herein.
2. Claudia Z. Springer is awarded reimbursement of actual, necessary expenses in the amount of \$2,717,412.54.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).

3. The Trustee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

4. This Court shall retain jurisdiction with respect to all matters related to the interpretation or implementation of this Order.

5. This Order shall be effective immediately upon entry.