

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

SAGA FORMATIONS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re. D.I. 876 and 896

**CERTIFICATION OF COUNSEL SUBMITTING AGREED ORDER
ALLOWING CERTAIN TENNESSEE DEPARTMENT OF REVENUE CLAIMS**

The undersigned counsel to Claudia Z. Springer, not individually but as the Chapter 11 Trustee (the “Trustee”) of the estates of Saga Formations, Inc. (“Saga”), Pajeau, Inc. (“Pajeau”), and Tangible Play, Inc. (“Tangible Play,” together with Saga and Pajeau, collectively the “Debtors” and, each, a “Debtor”), hereby certifies that:

1. On August 6, 2025, the Trustee filed the *Trustee’s First Omnibus Objection (Substantive) to Certain (I) Priority Claims and (II) Administrative Expense Claims* [D.I. 876] (the “First Claim Objection”) whereby it objected to, *inter alia*, Tennessee Department of Revenue (“Tennessee”) Claim No. 218.

2. On August 20, 2025, Tennessee filed the *Response by the Tennessee Department of Revenue to the Trustee’s First Omnibus Objection to Claims* [D.I. 896] (the “Response”).

3. Since August 20, 2025, the Trustee, her professionals and Tennessee’s counsel engaged in discussions to resolve the Response and allow certain of Tennessee’s claims. As a result of fruitful discussions, the Trustee and Tennessee have negotiated the *Agreed Order Allowing Tennessee Department of Revenue’s Claim* (the “Proposed Agreed Order”) attached hereto as **Exhibit A**.

¹ 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).



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WHEREFORE, the undersigned respectfully requests entry of an order consistent with the Proposed Agreed Order attached hereto as **Exhibit A**, at the Court's earliest convenience.

Dated: November 14, 2025
Wilmington, Delaware

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

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EXHIBIT A

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

In re:

SAGA FORMATIONS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re. D.I. 876

**AGREED ORDER ALLOWING A CERTAIN
TENNESSEE DEPARTMENT OF REVENUE CLAIM**

This Order resolves a certain Tennessee Department of Revenue (“Tennessee”) claim filed in these Chapter 11 Cases; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §1334(b) and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware* dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O); and this Court having found that venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that all of the requirements of section 503(b) of title 11 of the United States Code, and the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware have been satisfied; and Chapter 11 Trustee Claudia Z. Springer (the “Trustee”) of the estates of Saga Formations, Inc. (“Saga”), Pajeau, Inc. (“Pajeau”), and Tangible Play, Inc. (“Tangible Play,” together with Saga and Pajeau, collectively the “Debtors” and, each, a “Debtor”) having agreed to resolve Tennessee’s claim in these Chapter 11 Cases on the terms set forth herein; and after due deliberation and sufficient good cause appearing therefor, it is

¹ 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).

HEREBY ORDERED THAT:

1. Tennessee is allowed an administrative expense claim against the estate of Saga in the amount of \$18,803.39 (the “Allowed Tennessee Claim”).

2. As a result of the Allowed Tennessee Claim: (a) Tennessee, on behalf of itself and its respective successors, assigns, representatives, and any and all other entities who may purport to assert any claim or causes of action against the Trustee, the Debtors, or the Debtors’ estates, shall be deemed to have fully and finally released and extinguished any claims, debts, judgments, awards, liens, and causes of action that they may hold against any of the Trustee, the Debtors, or the Debtors’ estates, whether known or unknown, asserted or unasserted except as it relates to those claims memorialized in Claim Nos. 114 & 219 [Claim Nos. 114 & 219 are hereby preserved]; and (b) the Trustee, on behalf of each of the Debtors’ estates, shall be deemed to have fully and finally released any and all claims, debts, judgments, awards, liens, and causes of action against Tennessee, whether known or unknown, asserted or unasserted.

3. As a result of this Order, Claim No. 218 is hereby withdrawn.

4. This Order shall be effective immediately upon entry.

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