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

In re:

EPIC! CREATIONS, INC., et al.,

(Jointly Administered)

Debtors.<sup>1</sup>

Re D.I. 448

Chapter 11

Case No. 24-11161 (BLS)

### CERTIFICATE OF COUNSEL REGARDING ORDER APPROVING FIRST APPLICATION OF CLAUDIA Z. SPRINGER, CHAPTER 11 TRUSTEE, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD SEPTEMBER 23, 2024, THROUGH AND INCLUDING DECEMBER 31, 2024

The undersigned counsel to Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the "<u>Trustee</u>") of Epic! Creations, Inc. ("<u>Epic</u>"), Neuron Fuel, Inc. ("<u>Neuron Fuel</u>"), and Tangible Play, Inc. ("<u>Tangible Play</u>," together with Epic and Neuron Fuel, collectively the "<u>Debtors</u>") hereby certifies as follows:

1. On January 13, 2025, the Trustee filed the *First Application of Claudia Z. Springer*, *Chapter 11 Trustee, for Allowance of Compensation and Reimbursement of All Actual and Necessary Expenses Incurred for the Period September 23, 2024 Through and Including December 31, 2024* [D.I. 448] (the "Application").

2. Pursuant to the Notice of Application, objections or responses to the Application were to be filed and served no later than February 3, 2025, at 4:00 p.m. (ET) (the "<u>Objection</u> <u>Deadline</u>"). To the best of the undersigned's knowledge, information and belief, neither the

<sup>&</sup>lt;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: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).



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 **<u>Exhibit A</u>** at the earliest convenience of the Court.

Dated: February 4, 2025 Wilmington, Delaware

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

<u>/s/ Alexis R. Gambale</u> Henry J. Jaffe (No. 2987) Joseph C. Barsalona II (No. 6102) Alexis R. Gambale (No. 7150) 824 N. Market Street, Suite 800 Wilmington, DE 19801 Telephone: (302) 592-6496 Email: hjaffe@pashmanstein.com jbarsalona@pashmanstein.com

-and-

### **JENNER & BLOCK LLP**

Catherine Steege (admitted *pro hac vice*) Melissa Root (admitted *pro hac vice*) William A. Williams (admitted *pro hac vice*) 353 N. Clark Street Chicago, Illinois 60654 Telephone: (312) 923-2952 Email: csteege@jenner.com mroot@jenner.com wwilliams@jenner.com

Co-counsel to the Trustee

# <u>Exhibit A</u>

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

In re:

EPIC! CREATIONS, INC., et al.,

Case No. 24-11161 (BLS)

Chapter 11

(Jointly Administered)

Debtors.<sup>1</sup>

Re D.I. 448

### ORDER APPROVING FIRST APPLICATION OF CLAUDIA Z. SPRINGER, CHAPTER 11 TRUSTEE, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF ALL ACTUAL AND NECESSARY EXPENSES INCURRED FOR THE PERIOD SEPTEMBER 23, 2024, THROUGH AND INCLUDING DECEMBER 31, 2024

Upon consideration of the Application of Claudia Z. Springer (the "<u>Trustee</u>"), 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 September 23, 2024 through and including December 31, 2024, 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 award reimbursement of actual, necessary expenses in the amount of \$275,813.69.

<sup>&</sup>lt;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: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).

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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.