Docket #1241 Date Filed: 11/2/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: SAGA FORMATIONS, INC.,[1] Debtor.	Chapter 11 Case No. 24-11161 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. FUNDERS APP LLC (D/B/A 24 CAPITAL, D/B/A SYMPLIFI CAPITAL, D/B/A MR. ADVANCE), 24 CAPITAL LLC, MR. ADVANCE LLC, SECURE CAPITAL FUNDING LLC, DC FUND LLC (D/B/A SECURE CAPITAL), MARK ALLAYEV, JONATHAN ALLAYEV, AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. _____ (BLS)

COMPLAINT
FILED UNDER SEAL

[1] The last four digits of Saga Formations, Inc. f/k/a Epic Creations, Inc. federal tax identification number are 9113. In addition to the foregoing Debtor, the "Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Debtors' claims and noticing agent at https://www.veritaglobal.net/epiccreations. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Saga Formations, Inc., Case No. 24-11161 (BLS).

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