

**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 (JTD)

(Jointly Administered)

Claudia Z. Springer, Chapter 11 Trustee,
Plaintiff

Adv. Pro. No. 24-50142 (JTD)

v.

Re Adv. Pro. D.I. 1 & 11

Stripe, Inc.;
Wells Fargo Bank, National Association;
Whitehat Education Technology LLC; and
John Does 1-100,
Defendants.

**STIPULATION PURSUANT TO LOCAL RULE 7012-2 EXTENDING
DEFENDANT WELLS FARGO BANK, NATIONAL ASSOCIATION'S TIME TO
RESPOND TO THE COMPLAINT**

The above-captioned plaintiff ("Plaintiff") and defendant Wells Fargo Bank, National Association ("Defendant"), by and through their undersigned counsel, pursuant to Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), hereby stipulate as follows:

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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1. On October 8, 2024, Plaintiff filed the *Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, and Avoidance and Recovery under 11 U.S.C. §§ 549 and 550* [Adv. Pro. D.I. 1] (the “Complaint”).

2. On October 11, 2024, the Court issued a summons [Adv. Pro. D.I. 11] with respect to the Complaint.

3. The time for Defendant to respond to the Complaint is currently November 12, 2024.

4. Pursuant to Local Rule 7012-2, “[t]he deadline to plead or move in response to a complaint or other pleading in an adversary proceeding may be extended for a period of up to twenty-eight (28) days by stipulation of the parties docketed with the Court[.]” Del. Bankr. L.R. 7012-2.

IT IS HEREBY STIPULATED AND AGREED by the parties that:

5. The time within which Defendant may file an answer, move, or otherwise respond to the Complaint is hereby extended through and including November 15, 2024.

6. This Stipulation is without prejudice to Plaintiff’s or Defendant’s substantive rights

[Signature Page Follows]

IT IS SO STIPULATED

Dated: November 12, 2024

PASHMAN STEIN WALDER HAYDEN, P.C.

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