

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

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , ¹	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50233 (JTD)
Plaintiff,	(Jointly Administered)
vs.	
Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath,	Re. D.I. 2
Defendants.	

CERTIFICATE OF COUNSEL REGARDING
CONTESTED ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION
FOR A TEMPORARY INJUNCTION

The undersigned counsel to Plaintiff Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the Estates of Epic! Creations, Inc. (“Epic”), Neuron Fuel, Inc. (“Neuron Fuel”), and Tangible Play, Inc. (“Tangible Play,” together with Epic and Neuron Fuel, collectively the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) hereby certifies 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).



1. On November 18, 2024, the Trustee filed the *Trustee's Motion for Entry of Temporary Restraining Order* [Adv. Pro. D.I. 2] (the "Motion").²

2. On November 19, 2024, the Court held an emergency hearing to hear the Motion (the "Hearing").

3. At the Hearing, the Court granted the Motion and directed the Trustee to submit an agreed upon Temporary Restraining Order after discussing the same with counsel for Google and the Voizzit Defendants, respectively, by 5:00 pm ET today.

4. Following the Hearing, counsel to the Trustee sent counsel for Google and the Voizzit Defendants a revised proposed Temporary Restraining Order and, after discussions with counsel for such parties, agreed to further changes to the proposed order. The proposed order reflecting certain (but not all) of these proposed changes and that is acceptable to the Trustee is attached hereto as **Exhibit A** (the "Trustee's Proposed TRO").

5. On November 19, 2024, counsel to Google indicated that it did not agree with portions of the Trustee's Proposed TRO and further modified the Trustee's Proposed Order (the "Google Proposed TRO"), attached hereto **Exhibit B**. A blackline comparing the Google Proposed TRO to the Trustee's Proposed TRO is attached hereto as **Exhibit C**.

6. Google has requested changes to paragraphs 1 and 2 of the Trustee's Proposed TRO. With respect to paragraph 1, Google's counsel stated that its change was necessary because: "The definition of "Google Accounts" isn't clear. If the implication is to define this provision to mean accounts pursuant to contracts with the Debtors, that currently would only be those the Trustee previously identified as Epic accounts. As addressed many times previously, Google has

² All capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Motion.

not identified accounts owned by Tangible Play and Neuron.” The Trustee disagrees, as Trustee for Epic, Tangible Play, and Neuron Fuel she should have complete access to all Google Accounts for all Debtors.

7. With respect to paragraph 2, Google’s counsel stated that its change was necessary because: “despite agreeing that the accounts need to be specifically identified, the Trustee is seeking something broader. If the Trustee wants Google to provide control and access to an account, she needs to identify it here. If it is not identified here or by some other means, Google will not likely be able to provide control and access without a subsequent order.” The Trustee disagrees. The Trustee has provided Google with all of the information available to her and the very purpose of this TRO is to give the Trustee complete access to the Google Accounts. If the Trustee identifies additional accounts upon receiving this access, Google should be required to comply with the terms of the TRO Order with respect to those accounts.

8. Finally, counsel for the Voizzit Defendants asked counsel for the Trustee the following question at 12:58 p.m. E.T. “Thanks for sending. Paragraph 3 is showing as added in the redline, can you please confirm that was not in your previously submitted motion/order? Could you please provide us your basis for adding it now? I do not recall you asking to modify the order in this way on the call this morning.” Counsel for the Trustee responded at 1:09 p.m. ET, “Yes, we added paragraph 3 to address the point James made in 2, below, which Cathy discussed at the hearing. I don’t see why this is controversial in any event—the Court found a stay violation last week. If your clients are continuing to attempt to exercise control or possession of Estate property, that’s a continuing stay violation and a violation of the Court’s order. Let us know if you would like to discuss.” The Trustee has not heard anything further from counsel for the Voizzit Defendants as of the filing of this COC.

9. As a result, the Trustee is submitting the Trustee's Proposed TRO and the Google Proposed TRO for the Court's consideration and respectfully requests, for the reasons stated herein, that the Trustee's Proposed TRO should be entered as an order of this Court.

10. The Trustee remains available should the Court have any questions or concerns.

WHEREFORE, the Trustee respectfully requests that the Court enter the Trustee's Proposed TRO substantially in the form attached here as **Exhibit A** at the earliest convenience of the Court.

Dated: November 19, 2024
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale

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Counsel to the Trustee

EXHIBIT A

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

In re: EPIC! CREATIONS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 24-11161 (JTD) (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google LLC, Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Vinay Ravindra, Rajendran Vellapalath, Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered) Re. D.I. 2

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION
FOR A TEMPORARY INJUNCTION**

Upon consideration of the *Chapter 11 Trustee’s Motion for Temporary Restraining Order* (the “Motion”) ² filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Chapter 11 Trustee”) of the estates (the “Estates”) of the above-captioned debtors (the “Debtors”), the plaintiff in the above-captioned adversary proceeding (the “Adversary

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).

² Capitalized terms used herein and not defined shall have the meaning given to them in the Motion.

Proceeding”); and the Court having reviewed the Motion, and its supporting papers; and the Court having held a hearing on November 19, 2024 (the “Hearing”); and the Court having considered all evidence and argument presented at the Hearing; the Court finds and concludes as follows:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A), (E), and (O).

B. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409(a).

C. Notice of the Motion was sufficient under the circumstances.

D. The legal and factual bases set forth in the Motion and the Memorandum, the evidence in support of the Motion, and at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to Google is outweighed by the harm to the Trustee and the Debtors’ estates if the relief sought in the Motion is not granted, and that the balance of the equities and the public interest support granting the Motion.

For the reasons stated on the record at the Hearing, it is hereby **ORDERED THAT**:

1. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendant Google, LLC (“Google”), and all persons acting in concert with Google is enjoined: (i) from accepting, authorizing, or implementing any changes to the Epic! Creations, Inc. (“Epic”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Epic account at Google, the Tangible Play, Inc. (“Tangible Play”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Tangible Play account at Google, or Neuron Fuel, Inc. (“Neuron Fuel”) accounts at Google

Workspace, Google Cloud, Google Play Store or any other Neuron Fuel account at Google (collectively, the “Google Accounts”) by any entity or person other than the Trustee; and (ii) from transferring any funds Google is holding related to the Debtors including in the Google Accounts to any entity or person other than the Trustee.

2. Defendant Google is directed to provide the Trustee with complete control of the Google Accounts and account access along with all records of the Google Accounts, including, but not limited to, the following email extensions, domain names, and projects, and any such other email extensions, domain names, and projects as the Trustee may provide to Google:

Google Workspace accounts for the following Domain Names:

@getepic.com
@tangibleplay.com
@playosmo.com
@tynker.com

Google Cloud accounts with the following project info:

Project ID: epic-jenkins
Project Number: 1011349847158

Google Play Store accounts for the entities below (tax id numbers to be provided by the Trustee to Google to the extent she has them)

Epic! Creations, Inc.
Epic Creations Inc.
StoryMagic, Inc.
Tangible Play Inc
Neuron Fuel, Inc.
Voizzit Technology Private Limited

3. On or before 5:00 p.m. E.T. on November 22, 2024, Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath (the “Voizzit Defendants”) shall provide the Trustee and Google with a complete list of all accounts, assets, email extensions, projects, entity names, or other credentials relating in any way to the Google Accounts that were transferred by or to one or more of the Voizzit Defendants or individuals or entities working in concert with them from June 4, 2024 to present, and shall

facilitate the transfer of any such email extensions, projects, entity names, or other credentials from the Voizzit Defendants or individuals or entities under their control and to the Trustee.

4. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, the Voizzit Defendants, and all persons acting in concert with any of them, are enjoined from exercising ownership over, or transferring to any party other than the Trustee, the Debtors' applications, data, project, funds, or any other information or property of the Estates, or from taking any action to impair in any way the applications, data, projects, funds, or any other information or property of the Estates, including but not limited to deleting any information or metadata.

5. Defendant Voizzit Information Technology LLC is directed to transfer to the Trustee at instructions provided by the Trustee the Debtors' applications, data, project, funds, or any other information or property of the Debtors; given that any such transfer to Voizzit Information Technology LLC was void *ab initio* and a legal nullity, such that the technical return transfer to the Trustee maintains the status quo.

6. To the extent Google identifies accounts, projects, or other credentials or service other than those listed in Paragraph 2 hereof or provided by the Voizzit Defendants pursuant to Paragraph 4, Google shall, within two (2) business day of identifying such account, project, or other credentials or service, provide notice to counsel for the Trustee, and if the Trustee cannot provide Google with reasonable confirmation that such account, project, or other credential or service is property of the Estates, Google shall suspend all access to such account, project, or other credential or service and Google and the Trustee shall seek immediate direction from this Court.

7. The Court finds it necessary and appropriate for Google to take the above actions and that doing so Google shall not be held liable for any violations of the Stored Communications Act, 18 U.S.C. Chapter 121 §§2701-2713, as a result of its efforts to comply with this Order.

8. The Court shall hold a hearing on December 3, 2024, at 9:00 a.m. (Eastern time) to consider the entry of a preliminary injunction in connection with the Motion (the “**PI Hearing**”). Objections to the Motion shall be filed and served no later than three (3) business days prior to the PI Hearing. Replies may be filed by 4:00 p.m. (Eastern time) one (1) business day prior to the PI Hearing.

9. This Order shall be promptly filed in the Clerk’s office and entered in the record.

10. The terms and conditions of this Order shall be effective as of 10:34 a.m. (Eastern Time) on November 19, 2024, and this Order shall be enforceable immediately thereafter.

11. The Chapter 11 Trustee is directed to serve a copy of this Order upon the Defendants.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

EXHIBIT B

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

In re: EPIC! CREATIONS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 24-11161 (JTD) (Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee, Plaintiff, vs. Google LLC, Voizzit Technology Private Ltd. Voizzit Information Technology LLC Vinay Ravindra Rajendran Vellapalath Defendants.	Adv. Pro. No. 24-50233 (JTD) (Jointly Administered)

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION
FOR A TEMPORARY INJUNCTION**

Upon consideration of the *Chapter 11 Trustee’s Motion for Temporary Restraining Order* (the “Motion”) ² filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Chapter 11 Trustee”) of the estates (the “Estates”) of the above-captioned debtors (the “Debtors”), the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”); and the Court having reviewed the Motion, and its supporting papers; and the Court

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).

² Capitalized terms used herein and not defined shall have the meaning given to them in the Motion.

having held a hearing on November 19, 2024 (the “Hearing”); and the Court having considered all evidence and argument presented at the Hearing; the Court finds and concludes as follows:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A), (E), and (O).

B. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409(a).

C. Notice of the Motion was sufficient under the circumstances.

D. The legal and factual bases set forth in the Motion and the Memorandum, the evidence in support of the Motion, and at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to Google is outweighed by the harm to the Trustee and the Debtors’ estates if the relief sought in the Motion is not granted, and that the balance of the equities and the public interest support granting the Motion.

For the reasons stated on the record at the Hearing, it is hereby **ORDERED THAT:**

1. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendant Google, LLC (“Google”), and all persons acting in concert with Google is enjoined: (i) from accepting, authorizing, or implementing any changes to the Epic! Creations, Inc. (“Epic”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Epic account at Google, the Tangible Play, Inc. (“Tangible Play”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Tangible Play account at Google, or Neuron Fuel, Inc. (“Neuron Fuel”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Neuron Fuel account at Google by any

entity or person other than the Trustee; and (ii) from transferring any funds Google is holding related to the Debtors including in the Google Accounts to any entity or person other than the Trustee.

2. Defendant Google is directed to provide the Trustee with complete control of and access to the following accounts (the “**Google Accounts**”):

Google Workspace accounts for the following Domain Names:

@getepic.com
@tangibleplay.com
@playosmo.com
@tynker.com

Google Cloud accounts with the following project info:

Project ID: epic-jenkins
Project Number: 1011349847158

Google Play Store accounts for the entities below (tax id numbers to be provided by the Trustee to Google to the extent she has them)

Epic! Creations, Inc.
Epic Creations Inc.
StoryMagic, Inc.
Tangible Play Inc
Neuron Fuel, Inc.
Voizzit Technology Private Limited

3. On or before 5:00 p.m. E.T. on November 22, 2024, Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran Vellapalath (the “Voizzit Defendants”) shall provide the Trustee and Google with a complete list of all accounts, assets, email extensions, projects, entity names, or other credentials relating in any way to the Google Accounts that were transferred by or to one or more of the Voizzit Defendants or individuals or entities working in concert with them from June 4, 2024 to present, and shall facilitate the transfer of any such email extensions, projects, entity names, or other credentials from the Voizzit Defendants or individuals or entities under their control and to the Trustee.

4. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, the Voizzit Defendants, and all persons acting in concert with any of them, are enjoined from exercising ownership over, or transferring to any party other than the Trustee, the Debtors' applications, data, project, funds, or any other information or property of the Estates, or from taking any action to impair in any way the applications, data, projects, funds, or any other information or property of the Estates, including but not limited to deleting any information or metadata.

5. Defendant Voizzit Information Technology LLC is directed to transfer to the Trustee at instructions provided by the Trustee the Debtors' applications, data, project, funds, or any other information or property of the Debtors; given that any such transfer to Voizzit Information Technology LLC was void *ab initio* and a legal nullity, such that the technical return transfer to the Trustee maintains the status quo.

6. To the extent Google identifies accounts, projects, or other credentials or service other than those listed in Paragraph 2 hereof or provided by the Voizzit Defendants pursuant to Paragraph 4, Google shall, within two (2) business day of identifying such account, project, or other credentials or service, provide notice to counsel for the Trustee, and if the Trustee cannot provide Google with reasonable confirmation that such account, project, or other credential or service is property of the Estates, Google shall suspend all access to such account, project, or other credential or service and Google and the Trustee shall seek immediate direction from this Court.

7. The Court finds it necessary and appropriate for Google to take the above actions and that doing so Google shall not be held liable for any violations of the Stored Communications Act, 18 U.S.C. Chapter 121 §§2701-2713, as a result of its efforts to comply with this Order.

8. The Court shall hold a hearing on December 3, 2024, at 9:00 a.m. (Eastern time) to consider the entry of a preliminary injunction in connection with the Motion (the “**PI Hearing**”). Objections to the Motion shall be filed and served no later than three (3) business days prior to the PI Hearing. Replies may be filed by 4:00 p.m. (Eastern time) one (1) business day prior to the PI Hearing.

9. This Order shall be promptly filed in the Clerk’s office and entered in the record.

10. The terms and conditions of this Order shall be effective as of [_____] (Eastern Time) on November 19, 2024, and this Order shall be enforceable immediately thereafter.

11. The Chapter 11 Trustee is directed to serve a copy of this Order upon the Defendants.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

EXHIBIT C

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

In re:	Chapter 11
EPIC! CREATIONS, INC., <i>et al.</i> , ¹	Case No. 24-11161 (JTD)
Debtors.	(Jointly Administered)
Claudia Z. Springer, Chapter 11 Trustee,	Adv. Pro. No. 24-50233 (JTD)
Plaintiff,	(Jointly Administered)
vs.	Re-D.I.-2
Google LLC, Voizzit Technology Private Ltd. Voizzit Information Technology LLC Vinay Ravindra Rajendran Vellapalath	
Defendants.	

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION
FOR A TEMPORARY INJUNCTION**

Upon consideration of the *Chapter 11 Trustee’s Motion for Temporary Restraining Order* (the “Motion”)² filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “Chapter 11 Trustee”) of the estates (the “Estates”) of the above-captioned debtors (the “Debtors”), the plaintiff in the above-captioned adversary proceeding (the “Adversary

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).

² Capitalized terms used herein and not defined shall have the meaning given to them in the Motion.

Proceeding”); and the Court having reviewed the Motion, and its supporting papers; and the Court having held a hearing on November 19, 2024 (the “Hearing”); and the Court having considered all evidence and argument presented at the Hearing; the Court finds and concludes as follows:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b). This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(A), (E), and (O).

B. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409(a).

C. Notice of the Motion was sufficient under the circumstances.

D. The legal and factual bases set forth in the Motion and the Memorandum, the evidence in support of the Motion, and at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to Google is outweighed by the harm to the Trustee and the Debtors’ estates if the relief sought in the Motion is not granted, and that the balance of the equities and the public interest support granting the Motion.

For the reasons stated on the record at the Hearing, it is hereby **ORDERED THAT**:

1. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, Defendant Google, LLC (“Google”), and all persons acting in concert with Google is enjoined: (i) from accepting, authorizing, or implementing any changes to the Epic! Creations, Inc. (“Epic”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Epic account at Google, the

Tangible Play, Inc. (“Tangible Play”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Tangible Play account at Google, or Neuron Fuel, Inc. (“Neuron Fuel”) accounts at Google Workspace, Google Cloud, Google Play Store or any other Neuron Fuel account at Google ~~–(collectively, the “Google Accounts”)~~ by any entity or person other than the Trustee; and (ii) from transferring any funds Google is holding related to the Debtors including in the Google Accounts to any entity or person other than the Trustee.

2. Defendant Google is directed to provide the Trustee with complete control of and access to the following accounts (the “Google Accounts ~~and account access along with all records of the Google Accounts, including, but not limited to, the following email extensions, domain names, and projects, and any such other email extensions, domain names, and projects as the Trustee may provide to Google:”)~~:

Google Workspace accounts for the following Domain Names:

@getepic.com
@tangibleplay.com
@playosmo.com
@tynker.com

Google Cloud accounts with the following project info:

Project ID: epic-jenkins
Project Number: 1011349847158

Google Play Store accounts for the entities below (tax id numbers to be provided by the Trustee to Google to the extent she has them)

Epic! Creations, Inc.
Epic Creations Inc.
StoryMagic, Inc.
Tangible Play Inc
Neuron Fuel, Inc.
Voizzit Technology Private Limited

3. On or before 5:00 p.m. E.T. on November 22, 2024, Defendants Voizzit Technology Private Ltd, Voizzit Information Technology LLC, Vinay Ravindra, and Rajendran

Vellapalath (the “Voizzit Defendants”) shall provide the Trustee and Google with a complete list of all accounts, assets, email extensions, projects, entity names, or other credentials relating in any way to the Google Accounts that were transferred by or to one or more of the Voizzit Defendants or individuals or entities working in concert with them from June 4, 2024 to present, and shall facilitate the transfer of any such email extensions, projects, entity names, or other credentials from the Voizzit Defendants or individuals or entities under their control and to the Trustee.

4. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, the Voizzit Defendants, and all persons acting in concert with any of them, are enjoined from exercising ownership over, or transferring to any party other than the Trustee, the Debtors’ applications, data, project, funds, or any other information or property of the Estates, or from taking any action to impair in any way the applications, data, projects, funds, or any other information or property of the Estates, including but not limited to deleting any information or metadata.

5. Defendant Voizzit Information Technology LLC is directed to transfer to the Trustee at instructions provided by the Trustee the Debtors’ applications, data, project, funds, or any other information or property of the Debtors; given that any such transfer to Voizzit Information Technology LLC was void *ab initio* and a legal nullity, such that the technical return transfer to the Trustee maintains the status quo.

6. To the extent Google identifies accounts, projects, or other credentials or service other than those listed in Paragraph 2 hereof or provided by the Voizzit Defendants pursuant to Paragraph 4, Google shall, within two (2) business day of identifying such account, project, or

other credentials or service, provide notice to counsel for the Trustee, and if the Trustee cannot provide Google with reasonable confirmation that such account, project, or other credential or service is property of the Estates, Google shall suspend all access to such account, project, or other credential or service and Google and the Trustee shall seek immediate direction from this Court.

7. The Court finds it necessary and appropriate for Google to take the above actions and that doing so Google shall not be held liable for any violations of the Stored Communications Act, 18 U.S.C. Chapter 121 §§2701-2713, as a result of its efforts to comply with this Order.

8. The Court shall hold a hearing on December 3, 2024, at 9:00 a.m. (Eastern time) to consider the entry of a preliminary injunction in connection with the Motion (the “**PI Hearing**”). Objections to the Motion shall be filed and served no later than three (3) business days prior to the PI Hearing. Replies may be filed by 4:00 p.m. (Eastern time) one (1) business day prior to the PI Hearing.

9. This Order shall be promptly filed in the Clerk’s office and entered in the record.

10. The terms and conditions of this Order shall be effective as of ~~10:34 a.m.~~[_____] (Eastern Time) on November 19, 2024, and this Order shall be enforceable immediately thereafter.

11. The Chapter 11 Trustee is directed to serve a copy of this Order upon the Defendants.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

Summary report:	
Litera Compare for Word 11.8.0.56 Document comparison done on 11/19/2024 4:30:52 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: Epic! Revised Order on TRO Google (Filing version).docx	
Modified filename: Epic! Order on TRO Google (Google's version).docx	
Changes:	
<u>Add</u>	4
Delete	4
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	8