

**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. Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath, Defendants.	Adv. Pro. No. _____ (JTD) (Jointly Administered)

**TRUSTEE’S MOTION FOR ENTRY OF TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiff Claudia Z. Springer, Esq., in her capacity as Chapter 11 Trustee (the “Trustee”) of the estates (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”) brings this motion (the “Motion”) for entry of a temporary restraining order (the “TRO Order”) pursuant to 11 U.S.C. § 105(a) and Rule 7065 of the Federal Rules of Bankruptcy Procedure, which relief shall remain

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).



in effect until the Court can hold a hearing to consider the entry of a preliminary injunction in connection with the Motion.²

1. The Motion is intended to maintain the status quo by: (a) directing the Voizzit Defendants to immediately dismiss or withdraw the India Complaint; and (b) enjoining each Defendant and all persons acting in concert or participation with any Defendant from taking any act to continue prosecuting the India Complaint or from commencing, prosecuting, or otherwise continuing any lawsuit or other proceeding regarding the Trustee, the Debtors, or property of their estates in any other court, tribunal, or other adjudicative body or entity other than this Court.

2. This Motion is based on the *Trustee's Memorandum of Law in Support of Motion for Temporary Restraining Order* and the *Declaration of Jacob Grall in Support of Motion for Temporary Restraining Order*, filed concurrently herewith, all evidence to be presented at the hearing(s) on the Motion, and all matters of record in the above-captioned adversary proceeding and the above-captioned bankruptcy case.

3. Pursuant to 11 U.S.C. § 105(a) and/or Bankruptcy Rule 7065, the Court should enter the Proposed Order enclosed as **Exhibit A** to this Motion, and granting such further relief as the Court deems just and appropriate.

² Capitalized terms used herein and not defined shall have the meaning given to them in the *Chapter 11 Trustee's Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*.

Dated: December 10, 2024
Wilmington, DE

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Exhibit A
(Proposed TRO)

**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. Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath, Defendants.	Adv. Pro. No. _____ (JTD) (Jointly Administered)

**ORDER GRANTING CHAPTER 11 TRUSTEE’S MOTION FOR
ENTRY OF TEMPORARY RESTRAINING ORDER**

Upon consideration of the *Chapter 11 Trustee’s Motion for Entry of Temporary Restraining Order* (the “**Motion**”)² filed by Claudia Z. Springer, not individually but solely as the chapter 11 trustee (the “**Trustee**”) of the above-captioned debtors (the “**Debtors**”), and the plaintiff in the above-captioned adversary proceeding (the “**Adversary Proceeding**”); the Court having reviewed the Motion, and its supporting papers; and the Court having held a hearing on December 11, 2024 (the “**Hearing**”); and the Court having considered all evidence and arguments presented at the Hearing; the Court finds and concludes 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).

² Capitalized terms used herein and not defined shall have the meaning given to them in the *Chapter 11 Trustee’s Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*.

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, the *Chapter 11 Trustee's Memorandum of Law in Support of Motion for Entry of Temporary Restraining Order*, the *Declaration of Jacob Grall in Support of Motion for Temporary Restraining Order* and other evidence submitted in support of the Motion, and the arguments presented at the Hearing establish just cause for the relief granted herein.

E. The Court finds that the Voizzit Defendants' filing of a complaint and related requests for relief (collectively, the "**India Complaint**") against the Trustee on or around November 20, 2024 with the Commercial Court of Ernakulam in India, as reflected in the materials attached as Exhibit A to the Trustee's complaint in the Adversary Proceeding, violated the automatic stay in effect in these chapter 11 cases by operation of section 362(a) of the Bankruptcy Code, and thus were void *ab initio*.

F. The Court finds that the Trustee has a reasonable probability of success in the Adversary Proceeding, that the Debtors' estates will be irreparably harmed if the relief sought in the Motion is not granted, that any harm to the Defendants 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 DECLARED and ORDERED THAT:

1. Within seven (7) days after entry of this Order, the Voizzit Defendants shall take all necessary steps to withdraw or dismiss the India Complaint and all claims asserted therein.

2. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(b), as made applicable herein by Bankruptcy Rule 7065, each Defendant, and all persons acting in concert or participation with any Defendant, are enjoined from taking any act to continue prosecuting or otherwise litigating the claims asserted in the India Complaint or from commencing, prosecuting, or otherwise continuing any lawsuit or other proceeding regarding the Trustee, the Debtors, or property of their estates in any other court, tribunal, or other adjudicative body or entity other than this Court.

3. Until further order from the Court, and pending a final hearing on the Trustee's request for a preliminary injunction, the website domains www.getepic.com and www.playosmo.com and all ancillary websites and applications are the property of the Debtors' estates and within the exclusive jurisdiction of this Court. Any actions taken in respect thereof must be with the Trustee and/or this Court's consent.

4. The Court shall hold a hearing on _____, 2024, at __: __ .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 __: __ .m. (Eastern Time) one (1) business day prior to the PI Hearing.

5. This Order shall be promptly filed in the Clerk's office and entered in the record. The terms and conditions of this Order shall be effective as of __: __ .m. (Eastern Time), December __, 2024, and is enforceable immediately thereafter. The Trustee is directed to serve a copy of this Order upon the Defendants.

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