

**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 (BLS)

(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. 24-50280 (BLS)

(Jointly Administered)

Re. D.I. 1, 2, 3, 12 & 20

**DECLARATION OF CLAUDIA Z. SPRINGER IN SUPPORT OF
EMERGENCY MOTION TO ENFORCE PRELIMINARY INJUNCTION
AND HOLD DEFENDANTS IN CONTEMPT**

Pursuant to 28 U.S.C. § 1746, I, Claudia Z. Springer, being duly sworn according to law,
hereby declares as follows:

1. I am the duly appointed Chapter 11 Trustee (the “Trustee”) of the estates of the
above-captioned debtors.

2. I am also a Principal in the Philadelphia office of Novo Advisors, a restructuring-
focused consulting firm. Prior to joining Novo Advisors in 2021, I practiced bankruptcy law for

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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more than 40 years, most recently as a partner at Reed Smith LLP, and prior to that, Duane Morris LLP.

3. I submit this declaration (the “Declaration”) in support of the *Emergency Motion to Enforce Preliminary Injunction and Hold Defendants in Contempt*.

4. On January 10, 2025, I directed my India counsel, to send an email to counsel for the Defendants attaching this Court’s TRO and PI Orders and instructing Defendants to withdraw the India complaint. A true and correct copy of this email is attached hereto as **Exhibit A**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 21, 2025

/s/ Claudia Z. Springer
Claudia Z. Springer

Exhibit A

From: Saloni Jain <saloni.jain@pblawoffices.com>
Sent: Friday, January 10, 2025 3:18 AM
To: sreekumarchelur@gmail.com; sarvamlegal@gmail.com
Cc: Samudra Sarangi <samudra@pblawoffices.com>; CDIA Project Aquila <cdia.projectaquila@pblawoffices.com>
Subject: Voizzit Technology Private Limited v. Think & Learn Private Limited & Ors (Commercial Suit No. 118 of 2024) |
Withdrawal of Suit and request for service of all supporting documents

WITHOUT PREJUDICE

Mr Chellur

Subject: Withdrawal of subject commercial suit and request for service of all supporting documents.

Re: Before the Hon'ble Commercial Court, Ernakulam
Commercial Suit No. 118 of 2024
Voizzit Technology Private Limited v. Think & Learn Private Limited & Ors.

The present communication is being issued on behalf and under instructions of our client – Defendant No. 2 in the captioned Commercial Suit.

I am taking the liberty of attaching two orders passed by the United States Bankruptcy Court for the District of Delaware (Delaware Court):

1. Temporary Restraining Order dated 11 December 2024 against the Plaintiff restraining it from continuing to prosecute the above-referred Commercial Suit.
2. Order of Preliminary Injunction dated 18 December 2024 whereby the filing of the captioned Commercial Suit has been found to be violate the automatic stay in effect and that within 7 (seven) days of the said order, the Plaintiff (and related parties) were directed to take all necessary steps to withdraw or dismiss the said Commercial Suit.

I am addressing this email to enquire if the Plaintiff intends on complying with the attached orders of the Delaware Court and take steps to withdraw the said Commercial Suit, or in the alternative proceed to prosecute the said matter in contempt of the orders of the Delaware Court? In the event you do not immediately dismiss this Suit as required by the Court orders, my client reserves all of her rights to seek appropriate sanctions.

Notwithstanding the attached orders of the Delaware Court, and without prejudice to my client's rights to seek sanctions, if the Plaintiff intends to continue prosecuting the said Commercial Suit, as ill-advised as that maybe, we would at least request you to immediately serve us with a complete paper book of the all filings made along with the Commercial Suit and specifically the supporting documents filed along with the Commercial Suit.

As you are aware, the next date of hearing in the matter is scheduled on 18 January 2024. Accordingly, we would request you to appropriately respond to this email on priority.

Thanking you.

Yours sincerely

Saloni Jain

Advocate for Defendant No. 2 – Claudia Z Springer, Esq. (in her capacity as a Chapter 11 Trustee)

--

Saloni Jain | Senior Associate

Law Offices of Panag & Babu

New Delhi | Bengaluru

New Delhi

No. 82

Okhla Industrial Estate - III

New Delhi 110020

Mobile: +91-9716840688

Telephone: +91-11-49996800



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losses suffered on account of unauthorized use or unintended transmission of this communication, due to technical fault or other reasons.

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

<p>In re:</p> <p>EPIC! CREATIONS, INC., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 24-11161 (JTD)</p> <p>(Jointly Administered)</p>
<p>Claudia Z. Springer, Chapter 11 Trustee,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Voizzit Technology Private Ltd., Voizzit Information Technology LLC, Think and Learn Pvt Ltd, and Rajendran Vellapalath,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 24-50280 (JTD)</p> <p>(Jointly Administered)</p>

**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

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*.

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:

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.

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. 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.

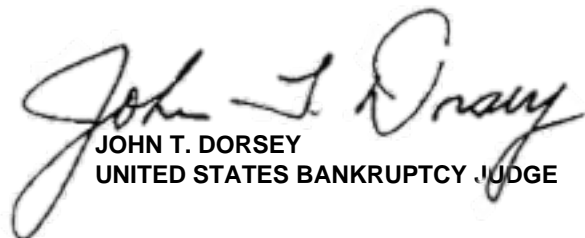
2. Until further order from the Court, and pending a final hearing on the Trustee's request for a preliminary injunction, the website domains www.getepic.com and www.playosmo.com and all ancillary websites and applications are the property of the Debtors' estates and within the exclusive jurisdiction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

3. The Court shall hold a hearing on December 19, 2024, at 1:00 p.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.

4. 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 10:18 a.m. (Eastern Time), December 11, 2024, and is enforceable immediately thereafter. The Trustee is directed to serve a copy of this Order upon the Defendants.

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

Dated: December 11th, 2024
Wilmington, Delaware


JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE

**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,

VS.

Adv. Pro. No. 24-50280 (JTD)

(Jointly Administered)

Voizzit Technology Private Ltd.,
Voizzit Information Technology LLC,
Think and Learn Pvt Ltd, and
Rajendran Vellapalath,

Defendants.

Re. Adv. D.I. 2, 3, 12

ORDER GRANTING CHAPTER 11 TRUSTEE'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Upon consideration of the *Chapter 11 Trustee's Motion for Entry of a Preliminary Injunction* (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 the Declaration filed in support of the Motion; and each of the above-captioned defendants (the "Defendants") having failed to object to the entry of this preliminary injunction by

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*.

the deadline set by the Court; and the Court having considered all evidence and argument presented in support of the preliminary injunction; 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, the *Order Granting Chapter 11 Trustee's Motion For Entry Of Temporary Restraining Order* [Adv. D.I. 12], and the deadline to object to entry of this preliminary injunction was sufficient under the circumstances as to each Defendant.

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.

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.

Based on the foregoing findings, 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.

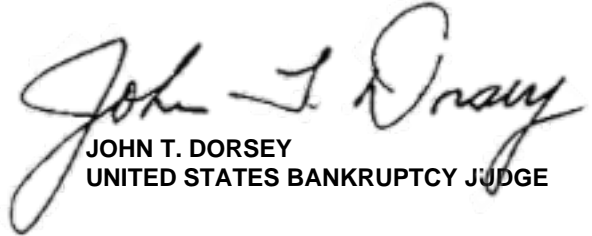
2. Until further order from this Court, and pursuant to Federal Rule of Civil Procedure 65(a), as made applicable herein by Bankruptcy Rule 7065, each Defendant, and all persons acting in concert or participation with any Defendant, are enjoined from taking any act to continue prosecuting or otherwise 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, 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's and/or this Court's consent.

4. 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 8:00 a.m. (Eastern Time), December 18, 2024, and is enforceable immediately thereafter. The Trustee is directed to serve a copy of this Order upon the Defendants.

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

Dated: December 18th, 2024
Wilmington, Delaware


JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE