

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.

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

vs.

Voizzit Technology Private Ltd.; Voizzit
Information Technology LLC; Rajendran
Vellapalath; Think & Learn Pte. Ltd.

Defendants.

NOTICE OF *AMENDED*² AGENDA OF MATTERS
SCHEDULED FOR HEARING ON MAY 22, 2025 AT 11:30 A.M. (ET)

THIS HEARING WILL BE ENTIRELY VIA ZOOM.

To attend this hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at www.deb.uscourts.gov.

Appearances at in-person court proceedings using Zoom are allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; (iii) a party who has a good faith health-related reason and has obtained permission from Judge Shannon's chambers to appear remotely, or (iv) other extenuating circumstances determined by Judge Shannon.

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 Amended items appear in bold and italicized font.



RESOLVED:

1. Chapter 11 Trustee's Motion for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of All of Substantially All of the Debtors Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [[D.I. 433](#), filed 01/07/2025]

Post-Auction Objection Deadline for Neuron Fuel, Inc. Sale: May 12, 2025.

Post-Auction Objection Deadline for Epic! Creations, Inc. Sale: May 19, 2025.

Responses/Objection Deadline for First Assumption List: February 25, 2025 at 4:00 p.m. (ET). The objection deadline was extended until March 4, 2025 at 11:59 p.m. (ET) for National Geographic. The objection deadline was further extended until March 11, 2025 at 11:59 p.m. (ET). The objection deadline was extended until March 7, 2025 at 11:59 p.m. (ET) for Geodis.

Responses/Objection Deadline for Second Assumption List: March 24, 2025 at 4:00 p.m. (ET). The objection deadline was extended until March 31, 2025 at 4:00 p.m. (ET) for Avalara, Inc. The objection deadline was further extended until April 7, 2025 at 11:59 p.m. (ET) for Avalara Inc. The objection deadline was further extended until April 14, 2025 at 11:59 p.m. (ET) for Avalara Inc.

Responses/Objection Deadline for Third Assumption List: April 14, 2025 at 4:00 p.m. (ET)

Responses/Objection Deadline for Fourth Assumption List: April 28, 2025 at 4:00 p.m. (ET)

Related Documents:

- A. Order (I) Approving Bid Procedures in Connection with the Sale of All or Substantially All of the Debtors' Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [[D.I. 474](#), filed 01/28/2025]
- B. Notice of Bid Procedures, Auctions, and Deadlines Relating to the Sale of All or Substantially All of the Assets of the Debtors [[D.I. 489](#), filed 02/03/2025]
- C. Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction ("First Assumption List") [[D.I. 510](#), filed 02/11/2025]

- D. Affidavit of Publication of the Notice of Bid Procedures, Auctions, and Deadlines Relating to the Sale of All or Substantially All of the Assets of the Debtors [[D.I. 518](#), filed 02/14/2025]
- E. Second Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction (the “Second Assumption List”) [[D.I. 560](#), filed 03/12/2025]
- F. Notice of Revised Sale Deadlines [[D.I. 581](#), filed 03/20/2025]
- G. Third Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [[D.I. 619](#), filed 04/04/2025]
- H. Notice of Revised Sale Deadlines [[D.I. 625](#), filed 04/10/2025]
- I. Fourth Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [[D.I. 636](#), filed 04/17/2025]
- J. Notice of Revised Sale Deadlines [[D.I. 644](#), filed 04/21/2025]
- K. Notice of Revised Sale Deadlines [[D.I. 660](#), filed 04/28/2025]
- L. Notice of Successful Bidder at Auction for Neuron Fuel, Inc. [[D.I. 673](#), filed 05/07/2025]
- M. Declaration of Claudia Z. Springer in Support of Entry of Order (I) Approving the Sale of Neuron Fuel, Inc.'s Assts Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief [[D.I. 674](#), filed 05/08/2025]
- N. Declaration of Michael Gorman in Support of Entry of Order (I) Approving the Sale of Neuron Fuel, Inc.'s Assts Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief [[D.I. 675](#), filed 05/08/2025]
- O. Fifth Notice to Counterparties to Potentially Assumed and Assigned Executory Contracts and Unexpired Leases Regarding Cure Amounts and Possible Assignment to the Successful Bidder at Auction [[D.I. 679](#), filed 05/12/2025]

- P. REDACTED Notice of Filing of Proposed [Neuron Fuel, Inc.] Sale Order [[D.I. 680](#), filed 05/12/2025]
- Q. SEALED Schedules annexed to Tynker Holdings APA [D.I. 681, filed 05/12/2025]
- R. SEALED Schedules annexed to Future Minds Group APA [D.I. 682, filed 05/12/2025]
- S. Declaration of Jeremy Keeshin in Support of Entry of an Order (I) Approving the Sale of Neuron Fuel, Inc.'s Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief [[D.I. 687](#), filed 05/14/2025]
- T. Notice of Successful Bidder to Auction for Epic! Creations, Inc. Assets [[D.I. 693](#), filed 05/15/2025]
- U. Declaration of Claudia Z. Springer in Support of an Order (I) Approving the Sale of Epic! Creations, Inc.'s Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief [[D.I. 694](#), filed 05/15/2025]
- V. Declaration of William Q Derrough in Support of Entry of an Order (I) Approving the Sale of Epic! Creations, Inc.'s Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief [[D.I. 696](#), filed 05/16/2025]
- W. Notice of Filing of Proposed [Epic! Creations, Inc.] Sale Order [[D.I. 698](#), filed 05/16/2025]
- X. Chapter 11 Trustee's Witness and Exhibit List for Hearing on May 20, 2025 at 3:30 p.m. (ET) [[D.I. 702](#), filed 05/19/2025]
- Y. Certificate of Counsel Regarding Chapter 11 Trustee's Motion for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of All of Substantiality All of the debtors Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [[D.I. 707](#), filed 05/19/2025]
- Z. Tynker Holdings, LLC's Witness and Exhibit List for May 20, 2025 Sale Hearing [[D.I. 709](#), filed 05/19/2025]

AA. GLAS Trust Company LLC Exhibit List for Hearing on May 20, 2025 at 3:30 p.m. (ET) [[D.I. 713](#), filed 05/19/2025].

BB. Certificate of Counsel Regarding Chapter 11 Trustee's Motion for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of All of Substantiality All of the debtors Assets, (II) Scheduling Bid Deadlines and Auctions, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (V) Granting Related Relief [Epic! Creations, Inc.] [[D.I. 715](#), filed 05/20/2025].

CC. Order (I) Approving the Sale of Neuron Fuel, Inc.'s Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection Therewith and (III) Granting Related Relief ([D.I. 723](#), filed 05/20/2025) (the "Neuron Fuel Sale Order")

DD. Order (I) Approving the Sale of Epic! Creations, Inc.'s Assets Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection therewith and (III) Granting Related Relief ([D.I. 724](#), filed 05/20/2025) (the "Epic! Creations Sale Order")

Cure Responses Received: See **Exhibit A** attached hereto.

Sale Responses Received: See **Exhibit B** attached hereto.

Status: The Court held a hearing on May 20, 2025 (the "May 20 Sale Hearing") where the Court approved both sales and entered both the Neuron Fuel Sale Order and Epic! Creations Sale Order, *see* D.I. 723 and 724, respectively. However, the Court scheduled a hearing for May 22 to resolve certain issues raised by the U.S. Government on the record at the May 20 Sale Hearing.

MATTERS GOING FORWARD

2. ***Emergency Motion to Enforce Preliminary Injunction and Hold Defendants in Contempt*** ([Adv. D.I. 31](#), filed 05/21/2025)

Objection Deadline: May 22, 2025 at 11:30 a.m. (ET)

Responses Received: None.

Related Pleadings:

A. ***Letter to the Court from Anoop P.V.*** ([D.I. 728](#), filed 05/21/2025)

- B. *Declaration of Claudia Z. Springer in Support of Emergency Motion to Enforce Preliminary Injunction and Hold Defendants in Contempt* ([Adv. D.I. 32](#), filed 05/21/2025)
- C. *Chapter 11 Trustee's Motion for Entry of an Order Shortening Notice of Hearing on the Emergency Motion to Enforce Preliminary Injunction and Hold Defendants in Contempt* ([Adv. D.I. 33](#), filed 05/21/2025)

Status: *This matter is going forward.*

Dated: May 21, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

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EXHIBIT A

Cure Responses

Cure Responses¹

FORMAL RESPONSES RECEIVED			
	Re. D.I.	Objecting Party	Status
1.	D.I. 533 , filed 02/24/2025	Ad Hoc Group of Publishers	Resolved with updated cure amount.
2.	D.I. 536 , filed 02/24/2025	Aeronet Worldwide, Inc.	Resolved with updated cure amount; however, it is mooted in light of sale process.
3.	D.I. 537 , filed 02/25/2025	Moduslink Corporation	Resolved with updated cure amount; however, it is mooted in light of sale process.
4.	D.I. 582 , filed 03/21/2025	Google, LLC	Resolved. <i>See</i> D.I. 715.
5.	D.I. 583 , filed 03/21/2025	Stripe, Inc.	Resolved. <i>See</i> D.I. 715.

INFORMAL RESPONSES RECEIVED		
	Objecting Party	Status
6.	Thomas Jeunesse	Resolved with updated cure amount.
7.	Wisconsin Historical Society Press	Resolved with updated cure amount.
8.	National Geographic	Resolved with updated cure amount.
9.	What on Earth Publishing	Resolved with updated cure amount.
10.	Avalara, Inc.	Resolved with updated cure amount.
11.	Geodis Hong Kong Ltd.	Resolved with updated cure amount; however, it is mooted in light of sale process.
12.	Amazon.com Services LLC	Comments were received late; however, it is mooted in light of sale process.

¹ The Debtors have endeavored to list each, and every applicable response received to date. However, given the number of responses received, the Debtors may have inadvertently omitted one or more responses. This chart is intended to assist the Court and parties in interest list. Nothing herein is intended to, or shall, prejudice the rights of the any party to the extent that such party has timely filed a response, which is later determined to have been inadvertently omitted.

EXHIBIT B

Adequate Assurance/Sale Objections¹

FORMAL RESPONSES RECEIVED			
	Re. D.I.	Objecting Party	Status
1.	D.I. 583 ; 03/21/2025	Stripe, Inc.	Resolved. <i>See</i> D.I. 715.
2.	D.I. 699 05/16/2025	Conscious Content, Inc. d/b/a Begin	Withdrawn. <i>See</i> D.I. 700

¹ The Debtors have endeavored to list each and every applicable responses received to date. However, given the number of responses received, the Debtors may have inadvertently omitted one or more responses. This chart is intended to assist the Court and parties in interest list. Nothing herein is intended to, or shall, prejudice the rights of the any party to the extent that such party has timely filed a response, which is later determined to have been inadvertently omitted.