

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

In re:

Saga Formations, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

Re. D.I. 184 & 211

**FIRST SUPPLEMENTAL DECLARATION OF JOSEPH C. BARSALONA II  
IN SUPPORT OF THE CHAPTER 11 TRUSTEE'S APPLICATION  
FOR ENTRY OF AN ORDER UNDER SECTIONS 327(a) AND 328(a)  
OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 2014 AND 2016, AND LOCAL  
RULES 2014-1 AND 2016-1 AUTHORIZING RETENTION AND EMPLOYMENT  
OF PASHMAN STEIN WALDER HAYDEN, P.C. AS DELAWARE BANKRUPTCY CO-  
COUNSEL FOR THE TRUSTEE *NUNC PRO TUNC* TO THE APPOINTMENT DATE**

I, JOSEPH C. BARSALONA II, hereby declare under penalty of perjury:

1. I am a partner at Pashman Stein Walder Hayden, P.C. ("Pashman"), which maintains an office for the practice of law at 824 North Market Street, Suite 824, Wilmington, DE 19801. I am an attorney at law, duly admitted and in good standing to practice in the state of Delaware, as well as in the United States District Court for the District of Delaware and the U.S. Court of Appeals for the Third Circuit.

2. I submit this supplemental declaration (the "Supplemental Declaration") to my declaration dated October 10, 2024 (the "Original Declaration," attached as Exhibit B to the *Chapter 11 Trustee's Application for Entry of an Order Under Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Pashman Stein Walder Hayden, P.C. as Delaware*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).



*Bankruptcy Co-Counsel for the Trustee Nunc Pro Tunc to the Appointment Date* (the “Application”)<sup>2</sup> This Supplemental Declaration does not replace anything set forth in the Application or the Original Declaration, except as expressly set forth herein.

3. Except otherwise indicated, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently hereto.<sup>3</sup>

4. Pashman conducted, and continues to conduct, research into its relations with Debtors, their creditors, and other parties in interest in these chapter 11 cases. In connection with this continued research, I am informed that Pashman has been engaged to represent GLAS USA LLC as local counsel in a matter unrelated to these chapter 11 cases.

5. Should any additional information relevant to Pashman’s retention and employment in the above-captioned cases come to Pashman’s attention, Pashman will file additional supplemental declarations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: June 30, 2025

/s/ Joseph C. Barsalona II  
Joseph C. Barsalona II (No. 6102)  
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*Counsel to Claudia Z. Springer, as Chapter 11  
Trustee to EPIC! Creations, Inc. and its debtor  
affiliates*

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<sup>2</sup> Capitalized terms not defined herein are defined in the Application.

<sup>3</sup> Certain of the disclosures herein relate to matters within the knowledge of other attorneys as Pashman and are based on information provided by them.