

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

EPIC! CREATIONS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

(Jointly Administered)

**NOTICE OF *SECOND AMENDED*<sup>2</sup> AGENDA OF MATTERS  
SCHEDULED FOR HEARING ON MAY 20, 2025 AT 3:30 P.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](http://www.deb.uscourts.gov).

**ALL PARTIES MUST REGISTER THROUGH  
ECOURTAPPEARANCE BY 11:00 A.M. (ET).**

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.

**RESOLVED MATTERS:**

1. Chapter 11 Trustee's Omnibus Motion for Entry for an Order (I) Authorizing the Rejection of Tangible Play Logistics Services Agreements and Abandonment of Related Personal Property Effective as of April 21, 2025; and (II) Granting Related Relief [[D.I. 645](#), filed 04/21/2025]

Objection Deadline: May 5, 2025 at 4:00 p.m. (ET).

<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: Epic! Creations, Inc. (9113); Neuron Fuel, Inc. (8758); and Tangible Play, Inc. (9331).

<sup>2</sup> Amended items appear in bold and italicized font.



Responses Received:

- A. Aeronet Worldwide, Inc.'s Limited Objection to Motion for Entry of an Order (I) Authorizing the Rejection of Tangible Play Logistics Service Agreements and Abandonment of Related Personal Property Effective as of April 21, 2025; and (II) Granting Related Relief [[D.I. 662](#), filed 05/01/2025]
- B. Informal comments received from BedaBox, LLC d/b/a ShipMonk
- C. Informal comments received from Shipwire, Inc. and CEVA Contract Logistics U.S., Inc.

Related Documents:

- D. Certificate of Counsel Regarding Chapter 11 Trustee's Omnibus Motion for Entry for an Order (I) Authorizing the Rejection of Tangible Play Logistics Services Agreements and Abandonment of Related Personal Property Effective as of April 21, 2025; and (II) Granting Related Relief [[D.I. 676](#), filed 05/09/2025]
- E. Order (I) Authorizing the Rejection of the Tangible Play Logistics Services Agreements and Abandonment of Related Personal Property Effective as of April 21, 2025; and (II) Granting Related Relief [[D.I. 678](#), filed 05/12/2025]

Status: The Court entered the order. No hearing is necessary.

**MATTERS GOING FORWARD:**

- 2. 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 Thereith 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].

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

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

Status: The matter is going forward.

Dated: May 20, 2025  
Wilmington, Delaware

**PASHMAN STEIN WALDER HAYDEN, P.C.**

/s/ Joseph C. Barsalona II

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**EXHIBIT A**

**Cure Responses**

**Cure Responses<sup>1</sup>**

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

<b>INFORMAL RESPONSES RECEIVED</b>		
	<b>Objecting Party</b>	<b>Status</b>
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.

<sup>1</sup> 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 Objections<sup>1</sup>**

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

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