

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

In re

AMERICAN SIGNATURE, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12105 (JKS)

(Jointly Administered)

**DECLARATION OF SB360 CAPITAL PARTNERS, LLC IN SUPPORT
OF DEBTORS' MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS
AUTHORIZING THE DEBTORS TO (A) ASSUME THE CONSULTING AGREEMENT,
(B) CONDUCT STORE CLOSING SALES, WITH SUCH SALES TO BE FREE AND
CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES, AND
(C) GRANTING RELATED RELIEF**

Robert A. Raskin, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury as follows:

1. I am over the age of twenty-one (21) years and am competent to make this Declaration.
2. I am Executive Managing Director and General Counsel of SB360 Capital Partners, LLC ("SB360"), with principal places of business located at 75 Second Avenue, Suite 570, Needham MA 02494. I have been employed by SB360 and its predecessor entities since 2002. Prior to that I was a partner at the law firm Stroock & Stroock & Lavan LLP.
3. I submit this declaration (the "Declaration") in support of the motion of American Signature, Inc. ("ASI") and its affiliated debtors and debtors-in-possession the above captioned chapter 11 cases (collectively, the "Debtors") for entry of Interim and Final Orders Authorizing the Debtors to (A) Assume The Consulting Agreement, (B) Conduct Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, and (iii) granting related relief [Docket No.0018] (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' federal tax identification number, are: American Signature, Inc. (6162); American Signature Home Inc. (8573); American Signature USA Inc. (6162); ASI Pure Promise Insurance LLC (6162); ASI Elston LLC (7520); ASI – Laporte LLC (6162); ASI Polaris LLC (6162); ASI Thomasville LLC (6162); and American Signature Woodbridge LLC (6162). The Debtors' business address is 4300 E. 5th Avenue, Columbus, OH 43235.



“Motion”) and in accordance with the Interim Order Granting in Part and Continuing in Part Debtors’ Motion to (A) Assume the Consulting Agreement, (B) Conduct Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances, (C) Scheduling a Hearing, and (D) Granting Related Relief [Docket No.0104] (the “Interim Order”).

4. The facts set forth in this Declaration are based upon my personal knowledge, information, and belief, and upon records kept in the ordinary course of business that were reviewed by me or other employees of SB360, under my supervision and direction. If called as a witness, I would testify to the facts set forth in this Declaration.

Evolution of SB360’s Business Relationship with the Debtors

5. SB360 was formed in 2018 as a merger of 360 Merchant Solutions, LLC and SB Capital Group, LLC. In 2024, the ownership of SB360 changed and the Schottenstein’s became 60% owners of SB360 and entities controlled by the Miller family became 40% owners. Although SB360 and the Debtors share some common ownership, it is my understanding that different Schottenstein family interests own SB360 than own ASI and the other Debtors. SB360 operates as an independent standalone business with its own management team and board distinct from those at ASI.

6. ASI and SB360 Holdings, LLC (“Holdings”), the parent of SB360, also have separate managers and boards. Aaron Miller, Stephen Miller, Joseph Schottenstein and Brian Strayton are the Managers of Holdings. The American Signature, Inc. petition lists Eric Jackson, Jeffry Swanson, Tod Friedman, Adam Zalev as members of the Board of Directors of ASI.

7. Although separate entities, SB360 and ASI have built a strong business relationship. For example, in September 2018, in the chapter 11 case of Heritage Home Group, LLC (“HHG”) that was pending in this Court (Chapter 11 Case No. 18-11736 before the Honorable Kevin Gross (the “HHG Case”), SB360 was retained by the Chief Restructuring Officer as consultant to liquidate certain assets of the applicable debtors. As part of that engagement, SB360 negotiated the wholesale sale of certain

furniture inventory to ASI². Following the HHG experience, ASI in 2020, with the assistance of SB360, negotiated a unique consignment arrangement with the Trustee overseeing the Chapter 7 Art Van Furniture, LLC (“Art Van”), that was also pending in this Court before the Honorable Christopher S. Sontchi (Case No 20-10553) (the “Art Van Case”) whereby ASI entered into an agreement, negotiated in part by SB360, with the debtors in the Art Van Case, pursuant to which ASI sold the Art Van debtor’s inventory in the ASI stores on a consignment basis, saving the estate significant operating costs. In February 2025, with the assistance of SB360, ASI entered into a private transaction to purchase, on a wholesale basis, quality furniture inventory, at a discount. Each of these acquisitions were negotiated by ASI’s independent management team with the aid of SB360 and facilitated ASI’s ability to inventory their stores with quality merchandise at very favorable cost. Other examples of SB360 providing support for ASI’s business are listed in paragraph 19 below.

8. The cooperative and supportive business relationship that SB360 and ASI have developed is consistent with the business relationship that SB360 strives to have with all of its clients. In mid-2025, Eric Jackson, the Chief Financial Officer of the Debtors reached out to SB360 to initially request that SB360 provide assistance in modeling various store closing scenarios for 5 to 7 retail store locations in markets that the Debtors were considering exiting, with such models using various sale timelines and certain assumptions of selling through excess aged inventory that the Debtors had on hand. Ultimately, in September 2025, when ASI’s management made the decision to close five (5) underperforming locations, they requested SB360 submit a proposal to serve as their consultant in connection with those locations.³ As has become our practice, the agreement allowed for stores to be

² The retention in that case was objected to by the US trustee as SB360 was not being retained as a professional and resulted in a decision by Judge Gross approving the retention. See *In re: Heritages Home Group*, 2018 WL 468802. SB360 was also part of a bidding group that purchased the Intellectual Property from the Debtors.

³ In 2024, the Debtors entered into an asset based loan facility with SB360’s affiliate, SACP (the “SACP Loan”). Included among the standard provisions in the underlying loan documents (the “SACP Loan Documents”), as has become industry standard, is a provision that provides that if the Debtors, as borrowers, sought to close more than 5 stores at a time, the borrowers agreed to retain the services of SB360 as consultant in connection therewith.

added or removed from the sale at the direction of the clients. I negotiated the legal terms of the Consulting Agreement with the General Counsel of ASI.

9. Shortly after the sale commenced at the original 5 closing locations, the Debtors engaged the services of Berkeley Research Group, LLC (“BRG”). BRG analyzed the Debtors’ retail store operations, which led to the designation of significantly more stores for closure. As part of its role as Consultant, SB360 worked with BRG to run various models around differing store closing scenarios.

10. Following BRG’s review, an additional 28 retail store locations were earmarked for closure by the Debtors, and on November 5, 2025, the Debtors, with the guidance and leadership of BRG, negotiated and entered into the First Amendment to the Consulting Agreement (the “First Amendment” and, together with the Original Consulting Agreement, the “Consulting Agreement”). Pursuant to the First Amendment, (i) the Debtors and SB360 agreed to close the additional 28 stores pursuant to the Consulting Agreement, (ii) a deposit to cover expenses was added as is the normal course, (iii) a provision where SB360 would help fulfill orders that were the subject of deposits from the Debtors’ customers was added, and (iv) based upon changed circumstances regarding the provision of Additional Merchandise, a fee to the Debtors of seven percent (7%) of the gross sale proceeds (net of sales taxes) from the sale of the Additional Merchandise was added in lieu of a sharing of net profits.

Issues Raised at November 25th Hearing

11. At the hearing before Your Honor on November 25, 2025 (the “November 25th Hearing”), counsel for the Office of the United States Trustee (the “U.S. Trustee”) raised what I understand to be the following objections regarding the Consulting Agreement: (i) that the Consulting Agreement should not be assumed on an interim basis, (ii) that the Consulting Agreement should not be assumed on an interim or final basis because of SB360’s affiliation with the Debtors and SACP; and (iii) that the Consulting Agreement should not be assumed on an interim or final basis because, given SB360’s affiliation with the Debtors, the fee being charged by SB360 for the services it was providing to the Debtors under the Consulting Agreement was inappropriate. The first concern was addressed by your honor’s ruling in the Interim Order.

Bankruptcy Courts' Approval of Consulting Agreements with Affiliates

12. The second objection raised by the U.S. Trustee was that the Court should not approve the Debtors' assumption of the Consulting Agreement on an interim or final basis because of SB360's affiliation with the Debtors and other parties involved in, or connected to, these cases. In recent years it has become more and more common for debtors and secured lenders to put in place a consultant who they trust and believe will deliver the best outcome from the liquidation sale. This case is no different. SB360 negotiated the Consulting Agreement and is operating the sale no differently than it would in any other circumstances regardless of its affiliation with the Debtors and/or SACP and it has performed at the same high level as it does for all of its clients. The daily sales results from the sale at the 33 stores that are the subject of the Consulting Agreement, which I have reviewed, show that the sales are approximately \$2.2 million (or approximately 18%) ahead of projections. The Court's decision at the November 25th Hearing and entry of the Interim Order allowed SB360 to remain in place on an interim basis so that the sale at the subject stores could take advantage of the marketing and sales strategy that was being implemented for the Thanksgiving/Black Friday holiday shopping and was a contributing factor to these successful results. Leaving SB360 in place through the end of the sale at these locations will enable the Debtors to leverage SB360's existing marketing and sales strategy with the goal of continuing on this successful trajectory.

Fees Charged Under the Consulting Agreement Are Reasonable and Market

13. The third objection raised by the U.S. Trustee was the assertion that the Court should not approve the Consulting Agreement on an interim or final basis because SB360 receipt of a fee under the Consulting Agreement was somehow something improper.

14. As set forth above, forty percent (40%) of the ownership of SB360, to whom SB360's management team (which is independent of the Debtors) are accountable, is unrelated to the Debtors and the Schottenstein family. Working for free is not in line with SB360's business model (nor is it common in this, or typically any, industry). Being the best at what you do and providing fair pricing and great

results is very much in line with SB360's business model, and that, as set forth above, is what we have done in these cases. As with any retention of SB360, SB360's motivation and obligation is to maximize the value of the client's assets - its affiliation with the Debtors does not affect that goal.

15. To supplement the testimony at the November 25th Hearing regarding the reasonableness of the fees being charged by SB360 under the Consulting Agreement, attached hereto as Exhibit A is a listing of various other furniture-specific court-approved liquidation retentions. As indicated therein, 2% is well within the customary range. As supported by the testimony at the November 25th Hearing, the fees being charged by SB360 in these cases falls squarely in line with the fees and expenses being charged in other cases. This fact, coupled with SB360's extensive experience in the furniture industry support a finding that the fees being charged are reasonable and market rates.

16. The Original Consulting Agreement was negotiated at arm's length between the Debtors and SB360, and subsequently, the First Amendment was negotiated, at arm's length, by BRG on behalf of the Debtors. My recollection is that a short time after the First Amendment was executed, Adam Zalev was appointed as an independent director on the Debtors' Board of Directors, and I learned that Mr. Zalev was going to review the Consulting Agreement (both the Original Consulting Agreement and the First Amendment) for purposes of determining whether or not he would recommend that the Debtors file the Motion seeking to assume the Consulting Agreement and continue with the already ongoing store closing sales. Ultimately, SB360 was advised that the Debtors had received the necessary approvals to proceed with the filing of the Motion (to assume the Consulting Agreement) as planned. The facts support that any concerns relating to the Debtors' retention of SB360 were addressed by this process.

SB360's Connection to Other Parties in Interest In These Cases

17. As a part of a large and diverse business operation, SB360 and its affiliates and shareholders have previously, currently, and may in the future appear or participate (as client, agent, consultant, appraiser, professional, advisor, investor, principal, lender or otherwise) in numerous cases, proceedings, transactions and engagements, with, among other market participants, professionals, advisors, banks and other lenders, landlords, restructuring firms, liquidation firms, vendors, insurance

carriers and brokers, operating companies, and equity and/or debt holders, each of whom may be involved in these proceedings, may represent SB360 and/or its affiliates and shareholders or other parties-in-interest in this case, and/or may be parties-in-interest in this case including, but not limited to the Debtor's professionals, A&G Realty Partners, LLC, Berkeley Research Group, LLC, C Street Advisory Group, LLC, Pachulski Stang Ziehl & Jones LLP, Reflect Advisors, LLC, and SSG Advisors, LLC ("Ordinary Course Interactions").

18. Except as disclosed herein, none of the Ordinary Course Interactions are matters directly connected or relating to the Debtors or these chapter 11 cases, nor does SB360 believe that any of the Ordinary Course Interactions will interfere with or impair SB360's activities, actions, responsibilities or objectives in this case.

19. SB360 is not being retained pursuant to section 327 of the Bankruptcy Code and applicable case law in Delaware and other jurisdictions provides that the disinterestedness standard does not apply.⁴ Nonetheless, as has been established by customary practice and as provided for in the Interim Order, SB360 obtained a list of the Debtors, their creditors, and other parties in interest in the above-captioned cases (a copy of which is annexed hereto as Schedule 1, the "Schedule of Parties in Interest") from the Debtors for purposes determining the connection(s), that SB360 or its affiliates has with such entities. Without limiting the generality of the foregoing disclosure regarding the Ordinary Course Interactions, and by way of example only for purposes of erring on the side of adequate disclosure, SB360 discloses the following:

- a. The Debtors are, indirectly, wholly-owned by the Schottenstein family, including through various trusts. SB360 is wholly-owned by Holdings. Sixty-percent of Holdings is owned by the Schottenstein family and the balance is owned by non-Schottenstein family interests.

⁴ SB360 and the other national liquidation firms have litigated the issue of whether these firms being retained as consultants are "professionals" requiring retention under section 327 of the Bankruptcy Code, in many cases, in several bankruptcy courts with the Office of the United States Trustee, and in each instance the respective Courts have ruled that they are not. While stating that they were not arguing the section 327 issues at the hearing on November 25, 2025, the U.S. Trustee reserved the right to assert all objections prior to the final hearing. To the extent that the section 327 retention argument is raised, SB360 fully reserves its rights to respond to any if the arguments raised.

- b. Jay Schottenstein is Chairman and CEO of SB360 and was the Chairmen of the Board of Directors of the Debtors prior to the filing of the bankruptcy petition..
- c. Upon information and belief, Schottenstein Realty LLC and its subsidiaries and affiliates, owned by the Schottenstein family, are the landlords for thirty-two' of the Debtors' retail store locations.
- d. SB360 is also affiliated with other transaction counterparties parties in these chapter 11 cases. Specifically, Second Avenue Capital Partners LLC ("SACP"), the Debtors' debtor-in-possession agent and lender and the administrative agent, collateral agent and lender under the Debtors' prepetition ABL facility, is also owned by Holdings.
- e. SACP SPV, LLC ("SACP SPV") is a special purpose vehicle that has a silent economic participation in loans made by SACP. Eric Jackson (CFO of the Debtors) and Jeffry Swanson (a member of the Board of Directors of the Debtors) and I, among others, are members of SACP SPV. The aforementioned loan participations in SACP loans are no more than 7.5% per loan and no one person holds an interest in SACP SPV greater than 10%. All lending and operational decisions regarding SACP loans are made by SACP.
- f. The Debtors have entered into agreements, subject to higher and better bids, with ASI Purchaser LLC, an affiliate of the Debtors (the "Stalking Horse Bidder"), which (a) grant the Stalking Horse Bidder designation rights on substantially all of the Debtors' leases and sell to the Stalking Horse Bidder, inter alia, certain of the Debtors' assets, and (b) grant the Stalking Horse Bidder the right to act as the Debtors' agent for purposes of liquidating their inventory, furniture, fixtures and equipment at certain locations; the Stalking Horse Bidder has indicated its intention to delegate the right described in clause (b) to SB360.
- g. Brian Strayton, listed under the "Current D&O" category, is a member of the Advisory Board for SB360's and SACP's investment committees and is a member of SACP SPV.
- h. Joseph Schottenstein, listed under the "Current D&O" category is the Chief Strategy Officer at SB360.⁵ He resigned from his position prior to filing of the bankruptcy petition.
- i. Steven D. Rabe is listed under the "Current D&O" category. Mr. Rabe's son, Jordan Rabe works for SB360 in a non-managerial role, as a financial analyst.
- j. SB360 holds a minority membership interest in a limited liability company that owns a minority stake in A&G Realty Partners, LLC, which appears on the list of professionals.

⁵ Upon information and belief, Joseph Schottenstein holds many roles within the broader Schottenstein organization, including Chief Operating Officer and Executive Vice President of Acquisitions and Leasing at Schottenstein Property Group (SPG) and Schottenstein Realty LLC, as well as Executive Vice President of Schottenstein Stores Corporation and a member of its board of directors.

- k. Tower Hill Advisory Services, LLC, is owned by Holdings. Tower Hill Advisory Services LLC was retained in 2024 by SACP to appraise the inventory of the Debtors and provided collateral monitoring services to SACP.
- l. In June of 2025, SB360 and the Debtors entered into a consignment agreement pursuant to which SB360 purchased certain inventory to be sold in the Debtors' stores on a consignment basis which expired in accordance with its terms in August of 2025. SB360 has also purchased and sold other inventory to the Debtors in 2025.
- m. The Debtors entered into Exclusive Supplier Managed USA Onshore Inventory and Sales Agreement, dated November 1, 2025 (the "Man Wah Agreement"), by and among American Signature, Inc., and Man Wah (Hong Kong) Trading Company Limited ("Man Wah"). In the event of a material breach by the Debtors under the Man Wah Agreement, SB360 agreed to purchase from Man Wah inventory on hand ordered by the Debtors under the Man Wah Agreement at a pre-agreed discount. Upon information and belief, there are no confirmed purchase orders pursuant to the Man Wah Agreement. The Debtors have filed a motion to reject the Man Wah Agreement. [Docket No. 17].
- n. For a brief period following SB360's formation, but prior to January 2022, a small number of parties (under 10) who worked at SB360 and its predecessor entity, SB Capital Group, LLC were on the payroll of ASI. The practice had started prior to the formation of SB Capital Group, LLC, when certain of these employees worked exclusively for the Schottenstein organization. ASI was reimbursed by SB Capital and subsequently SB360 for their allocable share of all amounts paid under this practice.
- o. Through its affiliations with the Schottenstein family businesses, SB360 and its affiliates, received certain volume cost savings in connection with various business and employee insurance covering a larger group of the affiliated entities. All insurance costs attributable to SB360 were paid for by SB360, either directly to the insurance carrier or as a reimbursement to the Schottenstein family business.
- p. SB360 and its predecessor entities may from time to time engage in its business on a joint venture basis with other nationally recognized retail disposition consulting firms and their affiliates, including (i) Hilco Merchant Resource; (ii) Gordon Brothers Retail Partners, (iii) Tiger Capital Group, LLC, and (iv) GA Group LLC in matters unrelated to the Debtors.
- q. Wells Fargo is listed under the "Sureties & Letters of Credit" category. SB360 and affiliates have a line of credit with Wells Fargo Bank, National Association. In addition, SB360 has performed services for Wells Fargo Equipment Finance in matters unrelated to the Debtors and these cases.
- r. The Huntington National Bank ("HNB") is listed under the "Banks" and "Utilities" categories. HNB is Administrative Agent of a loan to SB360's financing affiliate, Second Avenue Capital Partners LLC ("SACP Loan").
- s. The CIT Group is listed under the "Sureties & Letters of Credit" category. Affiliates of SB360 have participated in transactions with CIT Northbridge unrelated to these

cases. In addition, CIT's affiliate First-Citizens is a participant in certain lines of credit issued by SACP Loan.

- t. SB360 and its affiliates perform appraisals for national banks including PNC National Bank, which is listed under the "Banks" and "Lenders & Secured Creditors" categories. Marc S. Price is Executive Vice President of Corporate Development for SB360 Capital Partners. Before joining SB360, Mr. Price was head of the retail finance unit for PNC Business Credit. Upon information and belief, parties with an ownership interest in SB360 have ownership in other entities which have banking relationships with PNC.

20. Neither I, SB360, nor any principal, partner, director, officer, or employee thereof, nor any professional retained by SB360 has agreed to share or will share any portion of the compensation to be received from the Debtors by SB360 in connection with the Consulting Agreement with any other person or entity.

21. SB360 submits that it does not have an adverse interest to the Debtors in connection with the services being provided under the Consulting Agreement, and that none of the foregoing identified connections would disqualify SB360 from providing the services under the Consulting Agreement and serving as the Debtors' consultant.

22. The disclosures identified above are based upon my knowledge and belief after reasonable inquiry. SB360 will continue to review its relationships and to the extent necessary, this Declaration will be supplemented as appropriate.

I hereby certify, under penalty of perjury, that the foregoing factual statements made by me are true to the best of my knowledge, information and belief.

Dated: December 3, 2025

A handwritten signature in black ink, appearing to read 'R. Raskin', written over a horizontal line.

Robert A. Raskin

ASI

PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
1.)	Ace American Insurance Co	Insurance
2.)	AG Container Transport LLC	Shippers & Distribution Centers
3.)	Ahm Furniture Service LLC	Shippers & Distribution Centers
4.)	Alabama Motor Express Inc	Shippers & Distribution Centers
5.)	Alex Brown	Banks
6.)	Ameren Illinois Company	Utilities
7.)	American Alternative Insurance	Surety & Letters Of Credit
8.)	American Electric Power Co.	Utilities
9.)	American Express Travel	Surety & Letters Of Credit
10.)	American Global Logistics LLC	Shippers & Distribution Centers
11.)	American Guarantee & Liability Insurance Co	Insurance
12.)	American International Reinsurance Co Ltd	Insurance
13.)	American Signature Home Inc.	Debtor
14.)	American Signature USA Inc.	Debtor
15.)	American Signature Woodbridge LLC	Debtor
16.)	American Signature, Inc.	Debtor
17.)	Amwins Insurance Brokerage LLC	Insurance
18.)	Andrew Vara	U.S. Trustee's Office
19.)	Anthem	Employee Benefit Providers
20.)	Anthem Blue Cross And Blue Shield	Employee Benefit Providers
21.)	Aqua Ohio Inc	Utilities
22.)	Arch Insurance Company	Insurance
23.)	Artesian Water Company Inc	Utilities
24.)	Ascend LLC	Shippers & Distribution Centers
25.)	ASI – Laporte LLC	Debtor
26.)	ASI Elston LLC	Debtor
27.)	ASI Polaris LLC	Debtor
28.)	ASI Pure Promise Insurance LLC	Debtor
29.)	ASI Thomasville LLC	Debtor
30.)	Aspen Insurance Uk Limited	Insurance
31.)	Aspen Specialty Insurance Company	Insurance
32.)	Athena Energy Services	Utilities
33.)	Atlantic Security Ltd.	Insurance
34.)	Atmos Energy Corporation	Utilities
35.)	ATS Inc	Shippers & Distribution Centers
36.)	AW Metering Services LLC	Utilities
37.)	Axle Logistics LLC	Shippers & Distribution Centers
38.)	Belmont County Water & Sewer	Utilities
39.)	BenefitHub	Employee Benefit Providers
40.)	Benjamin Hackman	U.S. Trustee's Office
41.)	Berkeley Research Group, LLC	Debtor Professionals
42.)	BGE	Utilities
43.)	Brian T. Strayton	Current D&O
44.)	Broadleaf Contracting Inc	Shippers & Distribution Centers
45.)	Broadstone Avf Michigan, LLC	Surety & Letters Of Credit
46.)	Bungii LLC	Shippers & Distribution Centers
47.)	C Street Advisory Group, LLC	Debtor Professionals
48.)	Carelonrx Through Anthem	Employee Benefit Providers
49.)	Caseyville Township Sewer Syst	Utilities
50.)	Castera Transportation	Shippers & Distribution Centers
51.)	Centerpoint Energy Services	Utilities
52.)	Charles County Government	Utilities
53.)	Charter Township of Canton	Utilities
54.)	Charter Township of Clinton	Utilities
55.)	Charter Twnshp of Chesterfield	Utilities
56.)	Chesterfield County VA	Utilities
57.)	Chief Judge Karen B. Owens	Bankruptcy Judges
58.)	Choate, Hall & Stewart LLP	Lender Professionals
59.)	Christine Green	U.S. Trustee's Office
60.)	Chubb Bermuda Insurance Ltd.	Insurance
61.)	Cigna	Employee Benefit Providers
62.)	Circle Express Inc	Shippers & Distribution Centers
63.)	Citizens Gas & Coke Utility	Utilities
64.)	City of Altamonte Springs	Utilities
65.)	City of Calumet City	Utilities
66.)	City of Charlotte	Utilities

ASI

PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
67.)	City of Chicago	Utilities
68.)	City of Clarksville Department	Utilities
69.)	City of Clarksville Tenn	Utilities
70.)	City of Columbia	Utilities
71.)	City of Cuyahoga Falls	Utilities
72.)	City of Daytona Beach	Utilities
73.)	City of Dearborn	Utilities
74.)	City of East Point	Utilities
75.)	City of Franklin	Utilities
76.)	City of Fredericksburg	Utilities
77.)	City of Grand Rapids	Utilities
78.)	City of Hagerstown	Utilities
79.)	City of Joliet	Utilities
80.)	City of Lansing, By Its Board	Utilities
81.)	City of Northlake	Utilities
82.)	City of Novi	Utilities
83.)	City of Portage	Utilities
84.)	City of Richmond	Utilities
85.)	City of Sandusky Acct Office	Utilities
86.)	City of St Peters	Utilities
87.)	City of Taylor Water Dept	Utilities
88.)	City of Toledo	Utilities
89.)	City of Traverse City	Utilities
90.)	City of Utica	Utilities
91.)	City of Virginia Beach	Utilities
92.)	City of Westland	Utilities
93.)	Cobb Place Property LLC	Utilities
94.)	Cobbs Allen Capital LLC	Insurance
95.)	Columbia Gas	Utilities
96.)	Columbia Gas of Kentucky	Utilities
97.)	Columbia Gas of Maryland	Utilities
98.)	Columbia Gas of Ohio	Utilities
99.)	Columbia Gas of Virginia	Utilities
100.)	Columbus - City Treasurer	Utilities
101.)	Commonwealth Edison Company	Utilities
102.)	Constellation Energy Services	Utilities
103.)	Constellation Newenergy Inc	Utilities
104.)	Consumers Energy Company	Utilities
105.)	Cosco Container Lines America	Shippers & Distribution Centers
106.)	County of Henrico	Utilities
107.)	Coyote Logistics LLC	Shippers & Distribution Centers
108.)	Cranberry Township	Utilities
109.)	Crc Group	Insurance
110.)	Crum & Forster Specialty Insurance Company	Insurance
111.)	Custom Transport Inc	Shippers & Distribution Centers
112.)	Dayton Power And Light Co	Utilities
113.)	Deana Carrington	Current D&O
114.)	Dekalb County	Utilities
115.)	Delmarva Power	Utilities
116.)	Delta Charter Township	Utilities
117.)	Dena Schilling	Current D&O
118.)	Diane Giordano	U.S. Trustee's Office
119.)	Dion Wynn	U.S. Trustee's Office
120.)	Direct Energy Marketing Inc	Utilities
121.)	Dolly Inc	Shippers & Distribution Centers
122.)	Dominion East Ohio	Utilities
123.)	Dominion Energy South	Utilities
124.)	Dominion Virginia Power	Utilities
125.)	Downers Grove Sanitary Distrct	Utilities
126.)	DTE Energy	Utilities
127.)	Duke Energy	Utilities
128.)	Duquesne Light Company	Utilities
129.)	Edge Properties LLC	Utilities
130.)	Edith A. Serrano	U.S. Trustee's Office
131.)	Elizabeth Thomas	U.S. Trustee's Office
132.)	EMC Natural Gas Inc	Utilities

ASI

PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
133.)	Endurance American Specialty Ins Co	Insurance
134.)	Engie North America Inc	Utilities
135.)	Eric Jackson	Current D&O
136.)	Eric R. Duerksen	Current D&O
137.)	Evans Delivery Co Inc	Shippers & Distribution Centers
138.)	Evansville Water And Sewer	Utilities
139.)	Everest Indemnity Insurance Co	Insurance
140.)	Everest International Assurance Ltd.	Insurance
141.)	Everest National Insurance Co	Insurance
142.)	Express Scripts	Employee Benefit Providers
143.)	Factory Mutual Insurance Company	Insurance
144.)	Fairfax County Water Authority	Utilities
145.)	Fidelity	Employee Benefit Providers
146.)	Flint Township	Utilities
147.)	Florence Water And Sewer	Utilities
148.)	Florida Power & Light Company	Utilities
149.)	Forward Air Corporation	Shippers & Distribution Centers
150.)	Franklin County Sanitary	Utilities
151.)	Franklin Logistics Co LLC	Shippers & Distribution Centers
152.)	Freedom Specialty Insurance Co	Insurance
153.)	G&I IX Empire JV DLC LLC	Utilities
154.)	Gai Insurance Company Limited	Insurance
155.)	Gemini Insurance Company	Insurance
156.)	George Hunter	Current D&O
157.)	George Vemadakis	Current D&O
158.)	Georgia Power Company	Utilities
159.)	Grand Traverse County Dpw	Utilities
160.)	Great American Assurance Company	Insurance
161.)	Greenwood Sanitation	Utilities
162.)	Gwinnett County Dept of Water	Utilities
163.)	Hampton Roads Sanitation Distr	Utilities
164.)	Hannah M. Mccollum	U.S. Trustee's Office
165.)	Hanseatic Insurance Company Ltd.	Insurance
166.)	Hapag-Lloyd (America) LLC	Shippers & Distribution Centers
167.)	Hawa Konde	U.S. Trustee's Office
168.)	Hillsborough County Water Dept	Utilities
169.)	Hinge Health	Employee Benefit Providers
170.)	Holly Dice	U.S. Trustee's Office
171.)	Houston Casualty Company	Insurance
172.)	Huntington National Bank	Utilities
173.)	Huntington Sanitary Board	Utilities
174.)	IGS Ventures Inc	Utilities
175.)	Incline Casualty Company	Insurance
176.)	Indiana-American Water Co Inc	Utilities
177.)	Indianapolis Power & Light Co	Utilities
178.)	Insurance Company of the State of PA	Insurance
179.)	IOA National Inc.	Insurance
180.)	James R. O'malley	U.S. Trustee's Office
181.)	Jane Leamy	U.S. Trustee's Office
182.)	Jay L. Schottenstein	>5% Equity Holders
183.)	Jay L. Schottenstein	Current D&O
184.)	Jb Hunt Transport Inc	Shippers & Distribution Centers
185.)	JEA	Utilities
186.)	Jeffry D. Swanson	Current D&O
187.)	Jim Dierker	Current D&O
188.)	Jonathan Lipshie	U.S. Trustee's Office
189.)	Jonathan Nyaku	U.S. Trustee's Office
190.)	Joseph A. Schottenstein	Current D&O
191.)	Joseph Cudia	U.S. Trustee's Office
192.)	Joseph McMahon	U.S. Trustee's Office
193.)	Judge Brendan L. Shannon	Bankruptcy Judges
194.)	Judge Craig T. Goldblatt	Bankruptcy Judges
195.)	Judge J. Kate Stickles	Bankruptcy Judges
196.)	Judge John T. Dorsey	Bankruptcy Judges
197.)	Judge Laurie Selber Silverstein	Bankruptcy Judges
198.)	Judge Mary F. Walrath	Bankruptcy Judges

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PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
199.)	Judge Tomas M. Horan	Bankruptcy Judges
200.)	Kelly Routhier	Current D&O
201.)	Kentucky American Water Co.	Utilities
202.)	Kentucky Utilities Co.	Utilities
203.)	Kevin Hughes	Current D&O
204.)	Keystone Lines	Shippers & Distribution Centers
205.)	Kochville Township	Utilities
206.)	Kroehler Corporation	Current and Former Affiliates
207.)	Kroehler Furniture Mfg. Co., Inc.	Current and Former Affiliates
208.)	Lake County Dept of Utilities	Utilities
209.)	Landstar Inway Inc	Shippers & Distribution Centers
210.)	Lark Through Anthem	Employee Benefit Providers
211.)	Lauren Attix	U.S. Trustee's Office
212.)	LDC Funding LLC	Utilities
213.)	Legalshield	Employee Benefit Providers
214.)	Lexington Fayette	Utilities
215.)	Lexington Insurance Company	Insurance
216.)	Liberty Insurance Underwriters Inc	Insurance
217.)	Linda Casey	U.S. Trustee's Office
218.)	Linda Richenderfer	U.S. Trustee's Office
219.)	Louisville Gas & Electric Co	Utilities
220.)	Louisville Water Co.	Utilities
221.)	Lower Paxton Township	Utilities
222.)	Luxury Delivery Service, Inc.	Current and Former Affiliates
223.)	LV Trucking Inc	Shippers & Distribution Centers
224.)	Magna Carta Insurance, Ltd	Insurance
225.)	Mahoning Cty Sanitary Engineer	Utilities
226.)	Malcolm M. Bates	U.S. Trustee's Office
227.)	Mallory Valley Utility Distric	Utilities
228.)	Manatee County Utilities Dept	Utilities
229.)	Mediterranean Shipping Co(Usa)	Shippers & Distribution Centers
230.)	Melita Garrett Abbey	Current D&O
231.)	Merrillville Conservancy Dist	Utilities
232.)	MetLife	Employee Benefit Providers
233.)	Miami-Dade Water & Sewer	Utilities
234.)	Michael Girello	U.S. Trustee's Office
235.)	Middle Tennessee Electric	Utilities
236.)	Midvale Indemnity Company	Insurance
237.)	Mishawaka Utilities	Utilities
238.)	Monongahela Power Company	Utilities
239.)	Monroe County Water Authority	Utilities
240.)	Monroeville Water Authority	Utilities
241.)	Montgomery Cnty Water Services	Utilities
242.)	Morgan Stanley	Banks
243.)	Mountaineer Gas	Utilities
244.)	MSC Per Diem Dept	Shippers & Distribution Centers
245.)	Murfreesboro Water Resources	Utilities
246.)	Nashville Electric	Utilities
247.)	National Fuel Gas Dist Corp	Utilities
248.)	National Grid	Utilities
249.)	Navigators Insurance Company	Insurance
250.)	Newport News Waterworks	Utilities
251.)	North Shore Gas Company	Utilities
252.)	Northern Illinois Gas Company	Utilities
253.)	Northern Indiana Public	Utilities
254.)	Nyanquoi Jones	U.S. Trustee's Office
255.)	NYSEG	Utilities
256.)	Ohio Bureau of Workers Compensation	Surety & Letters Of Credit
257.)	Ohio Edison Company	Utilities
258.)	Omada	Employee Benefit Providers
259.)	Orlando Utilities Commission	Utilities
260.)	Pachulski Stang Ziehl & Jones Llp	Debtor Professionals
261.)	Palmetto Utilities Inc	Utilities
262.)	Parkersburg Utility Board	Utilities
263.)	Patrick J. Sanderson	Current D&O
264.)	Pennsylvania Power Company	Utilities

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PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
265.)	Pennsylvania-American	Utilities
266.)	Piedmont Natural Gas Co	Utilities
267.)	Pleasant Hills Authority	Utilities
268.)	PNC Bank, National Association	Banks
269.)	PNC Bank, National Association	Lenders & Secured Creditors
270.)	Potomac Electric Power Co	Utilities
271.)	PPL Electric Utilities	Utilities
272.)	Prince William County Service	Utilities
273.)	Profile Energy Inc	Utilities
274.)	Prudential	Employee Benefit Providers
275.)	Rapid Response Inc	Shippers & Distribution Centers
276.)	Raymond James	Banks
277.)	Richard Favata	Current D&O
278.)	Richard Schepacarter	U.S. Trustee's Office
279.)	Robert Bearden Inc	Shippers & Distribution Centers
280.)	Rochester Gas And Electric	Utilities
281.)	Rosa Sierra-Fox	U.S. Trustee's Office
282.)	RSUI Indemnity Company	Insurance
283.)	R-T Specialty, LLC - Burbank	Insurance
284.)	Schneider National Carriers	Shippers & Distribution Centers
285.)	Schottenstein Stores Corporation	>5% Equity Holders
286.)	Schottenstein Stores Corporation	Current and Former Affiliates
287.)	Scottsdale Insurance Company	Insurance
288.)	Second Avenue Capital Partners LLC	Lenders & Secured Creditors
289.)	Semco Energy Inc	Utilities
290.)	Shakima L. Dortch	U.S. Trustee's Office
291.)	Silvan Trucking LLC	Shippers & Distribution Centers
292.)	Silver Spring Township	Utilities
293.)	Site Centers Corp	Utilities
294.)	South Central Power Co	Utilities
295.)	South Stickney Sanitary Dist	Utilities
296.)	Southern Maryland Electric	Utilities
297.)	Southstar Energy Services LLC	Utilities
298.)	Spire Missouri Inc	Utilities
299.)	SSG Advisors, LLC	Debtor Professionals
300.)	Starr Indemnity & Liability Co	Insurance
301.)	Steadfast Insurance Company	Insurance
302.)	Steven D. Rabe	Current D&O
303.)	Suburban Natural Gas Company	Utilities
304.)	Suzanne Kiggin	Current D&O
305.)	Talkspace Through Anthem EAP	Employee Benefit Providers
306.)	Tampa Electric Company	Utilities
307.)	The Charter Oak Fire Insurance Company	Insurance
308.)	The CIT Group	Surety & Letters Of Credit
309.)	The City of Ann Arbor	Utilities
310.)	The Cleveland Electric	Utilities
311.)	The East Ohio Gas Company	Utilities
312.)	The Huntington National Bank	Banks
313.)	The Peoples Gas Light And Coke	Utilities
314.)	The Potomac Edison Company	Utilities
315.)	The Travelers Indemnity Company	Insurance
316.)	The Travelers Indemnity Company	Surety & Letters Of Credit
317.)	The Travelers Indemnity Company of Connecticut	Insurance
318.)	Timothy J. Fox, Jr.	U.S. Trustee's Office
319.)	Tod H. Friedman	Current D&O
320.)	Toledo Edison	Utilities
321.)	Total Transportation of Ms	Shippers & Distribution Centers
322.)	Town of Henrietta	Utilities
323.)	Town of Plainfield	Utilities
324.)	Transport One Inc	Shippers & Distribution Centers
325.)	Travelers Excess And Surplus Lines Company	Insurance
326.)	Travelers Property Casualty Company of America	Insurance
327.)	Treasurer of Spotsylvania	Utilities
328.)	Trimont LLC	Surety & Letters Of Credit
329.)	Triumph Business Capital	Shippers & Distribution Centers
330.)	UGI Utilities Inc	Utilities

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PII - Combined Schedule

#	Name of Interested Parties	Schedule Category
331.)	Union Electric Company	Utilities
332.)	Unique Logistics International	Shippers & Distribution Centers
333.)	United Specialty Insurance Company	Insurance
334.)	US Specialty Insurance Co	Insurance
335.)	UST Logistical Systems	Shippers & Distribution Centers
336.)	Value City Furniture, Inc.	Current and Former Affiliates
337.)	Veolia Water Pennsylvania Inc	Utilities
338.)	Village of Downers Grove	Utilities
339.)	Village of Gurnee	Utilities
340.)	Village of Orland Park	Utilities
341.)	Village of Schaumburg	Utilities
342.)	Virginia Natural Gas Inc	Utilities
343.)	VSP	Employee Benefit Providers
344.)	Washington Gas	Utilities
345.)	Waste Harmonics LLC	Utilities
346.)	Wells Fargo	Surety & Letters Of Credit
347.)	Westchester Surplus Lines Insurance Co	Insurance
348.)	Wex Bank	Shippers & Distribution Centers
349.)	William R. Kugel	Current D&O
350.)	Wintrust Bank, N.A.	Shippers & Distribution Centers
351.)	WV-American Water Co	Utilities
352.)	XL Specialty Insurance Co	Insurance
353.)	Zim Shipping Finance Limited	Shippers & Distribution Centers
354.)	Zim Shipping Per Diem Dept	Shippers & Distribution Centers
355.)	Zurich American Ins Co of IL	Insurance

In re: American Signature, Inc. et al. - Case No 25-121-5 (JKS)

Exhibit A to SB360 Declaration

FURNITURE LIQUIDATIONS 2018 TO 2025					
<u>Company</u>	<u>Type of Case</u>	<u>Year</u>	<u>Liquidator</u>	<u>Fee or Guaranty</u>	<u>Wholesale/Retail</u>
Heritage Home Group, LLC	Bankr. Del. 18-11736(KG)	2018	SB360	2% Retail/2.4% Wholesale Sales	Wholesale/Retail
Loves Furniture, Inc.	Bankr. E.D. Mich. 21-40083	2020	PFP and Store Cap	7% plus 5% commission	Retail
Klaussner Furniture Industries, Inc.	Receivership. Sup. Ct, NC 23-CVS-1786)	2023	SB360	5% Fee	Wholesale
United Furniture Industries, Inc.	Bankr. ND Mississippi 22-13422-SDM	2023	SB360, Hilco	4% Fee	Wholesale
American Freight, LLC (Franchise Group,	Bankr. Del. 24-12480(JTD)	2024	Hilco	2.0% Base Fee up to 2.5% if exceed hurdles	Retail
Conn's, Inc.	Bankr. SD Tex (Houston) 24-33357 (ARP)	2024	B. Riley	1.75% Base Fee up to 2.25% if exceed hurdles	Retail
At Home Group, Inc.	Bankr. Del. 25-11120 (JKS)	2025	Hilco	2.0% Base Fee up to 2.5% if exceed hurdles	Retail
OUT OF COURT LIQUIDATIONS					
Over the years there have been several non-public out of court furniture liquidations where SB360 (or its predecessor SB Capital) served as the liquidation consultant, in which the fees charged ranged from 5% to 9% of the gross recovery. Because the specifics of these transactions are not public, SB360 is not in a position to identify the name of the respective retailers.					
<u>LIQUIDATOR REFERENCE CHART</u>					
B. Riley refers to B. Riley Retail Solutions, LLC					
Hilco refers to Hilco Merchant Resources, LLC					
PFP refers to Planned Furniture Promotions					
SB Capital refers to SB Capital Group, LLC					
SB360 refers to SB360 Capital Partners, LLC					
Tiger refers to Tiger Capital Group, LLC					