

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

_____)	
In re:)	Chapter 11
)	
AMERICAN SIGNATURE, INC., <i>et al.</i> , ¹)	Case No. 25-12105 (JKS)
)	
Debtors.)	(Jointly Administered)
)	
_____)	Re: Docket Nos. 188 and 190

Hearing Date: December 15, 2025 at 10:30 a.m. (ET)

**DEBTORS' MOTION FOR LEAVE TO FILE LATE REPLIES IN SUPPORT OF
BID PROCEDURES MOTION AND STORE CLOSING MOTION**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) state as follows in support of this motion (this “Motion”):

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), granting the Debtors leave to file the late replies filed contemporaneously herewith [Docket Nos. 188 and 190] (the “Replies”) in support of (a) the *Motion of the Debtors for Entry of Orders (I)(A) Approving Bid Procedures for the Sale of Substantially All of the Debtors’ Assets, (B) Authorizing the Debtors to Enter Into (I) Stalking Horse Asset Purchase Agreement and (II) Stalking Horse Agency Agreement and to Provide Bid Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures, and (E) Scheduling a Sale*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s 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.



Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale of Assets Free and Clear of Liens, Claims, Interests, and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief[Docket No. 108] (the “Bid Procedures Motion”)² and (b) *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*[Docket No. 18] (the “GOB Sale Motion”).

Jurisdiction and Venue

2. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy Court for the District of Delaware (the “Court”) under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Bid Procedures Motion.

4. The statutory bases for the relief requested herein are section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Local Rule 9006-1(d).

Background

5. On November 22, 2025 (the “Petition Date”), the Debtors commenced these cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors have continued in the possession of their property and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Debtors’ chapter 11 cases. On December 4, 2025, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”).

6. The Debtors filed the GOB Sale Motion on November 24, 2025.

7. The Debtors presented the Motion at hearings on November 25, 2025 and November 26, 2025 (the “First Day Hearing”). The Court granted the Motion in part on an interim basis, continued the Motion in part, and entered the *Interim Order Granting in Part and Continuing in Part the 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. 104] (the “GOB Sale Interim Order”). In the GOB Sale Interim Order, the Court directed that a final hearing on the GOB Sale Motion be scheduled for December 15, 2025 at 11:30 a.m. (prevailing Eastern Time) with objections due December 3, 2025 at 4:00 p.m. (prevailing Eastern Time).

8. The Debtors filed the Bid Procedures Motion on November 26, 2025.

9. The Bid Procedures Motion was originally scheduled to be heard by the Court on December 9, 2025 at 11:00 a.m. Upon the request of the Committee, the hearing was rescheduled to December 15, 2025 at 11:30 a.m. (prevailing Eastern Time) (the “Hearing”).

10. Pursuant to Local Rule 9006-1(d), “[r]eply papers by the movant, or any party that has joined the movant, may be filed by 4:00 p.m. prevailing Eastern Time the day prior to the deadline for filing the agenda.” Del. Bankr. L.R. 9006-1(d). Parties may file a motion for leave to file a late reply, which shall not require a motion to shorten notice. Id.

11. Pursuant to Local Rule 9029-3(a)(i), the agenda for the Hearing was required to be filed on or before 12:00 noon (prevailing Eastern Time) on December 11, 2025. Accordingly, pursuant to Local Rule 9006-1(d), the deadline for the Debtors to file the Reply (the “Reply Deadline”) would have been 4:00 p.m. (prevailing Eastern Time) on December 10, 2025.

12. The Debtors granted the U.S. Trustee and the Committee extensions of time to object to the Bid Procedures Motion and GOB Sale Motion to December 10, 2025 (the “Extended Objection Deadlines”). The U.S. Trustee filed an objection to the GOB Sale Motion on December 10, 2025. Both the U.S. Trustee and the Committee filed objections to the Bid Procedures Motion on December 10, 2025.

13. Here, cause exists to allow the late filing of the Replies. Given the timing of the agenda filing deadline, the Extended Objection Deadlines, and the Hearing, the Debtors required additional time to review the objections filed and to prepare and file the Replies. The Debtors submit that no party will be prejudiced by the filing of a late Replies. Accordingly, the Debtors seek leave to file late Replies and to have the Replies deemed timely filed.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein and granting such other and further relief as may be just and proper.

Dated: December 13, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
David M. Bertenthal (CA Bar No. 167624)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
dbertenthal@pszjlaw.com

Proposed Counsel to the Debtors and Debtors in Possession

Exhibit A

Proposed Order

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

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In re:)	Chapter 11
)	
AMERICAN SIGNATURE, INC., <i>et al.</i> , ¹)	Case No. 25-12105 (JKS)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. ____

**ORDER GRANTING DEBTORS' MOTION FOR LEAVE TO FILE LATE REPLIES IN
SUPPORT OF BID PROCEDURES MOTION AND STORE CLOSING MOTION**

Upon consideration of the Debtors' *Motion for Leave to File Late Replies in Support of Bid Procedures Motion and Store Closing Motion*, IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Debtors are permitted to file late Replies and such Replies shall be deemed timely filed.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's 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.