

**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)

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

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS’
AMENDED² WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED
FOR DECEMBER 15, 2025, AT 10:30 A.M. (PREVAILING EASTERN TIME)**

The Official Committee of Unsecured Creditors (the “Committee”) of American Signature, Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) by and through its proposed undersigned counsel, hereby files this Witness and Exhibit List, identifying the individuals the Committee may call as witnesses and the evidence it may introduce at the hearing scheduled for **December 15, 2025 at 10:30 a.m. (prevailing Eastern Time)** before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware 19801 (the “Hearing”).

Witnesses

The Committee may call the following witnesses at the Hearing:

1. Rudolph Morando, Managing Director, Berkeley Research Group;

¹ The Debtors in these chapter 11 cases are: American Signature, Inc.; American Signature Home Inc.; American Signature USA Inc.; ASI Pure Promise Insurance LLC; ASI Elston LLC; ASI – Laporte LLC; ASI Polaris LLC; ASI Thomasville LLC; and American Signature Woodbridge LLC.

² Amendments to the Committee’s Witness and Exhibit List filed at Docket No. 180 appear in **bold**.



2. Teresa C. Kohl, Managing Director, SSG Advisors, LLC;
3. Boris J. Steffen, Managing Director, Province;
4. any witness called by any other party;
5. rebuttal witnesses, as necessary or as the Committee determines to be desirable; and
6. the Committee reserves the right to cross-examine any witness called by another party.

Exhibits

The Committee designates the following exhibits that may be used at the Hearing:

Exhibit #	Description	Docket No.
1	Declaration of Rudolph Morando in Support of the Debtors' Chapter 11 Petitions and First Day Relief	Docket No. 5
2	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 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
3	Stalking Horse Asset Purchase Agreement dated as of November 25, 2025	Docket No. 108-3
4	Stalking Horse Agency Agreement dated as of November 25, 2025	Docket No. 108-3
5	Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Approving Bid Procedures and Stalking Horse Agreement	Docket No. 174

Exhibit #	Description	Docket No.
6	Hearing Transcript, <i>In re JOANN Inc.</i> , No. 25-10068 (CTG) (Bankr. D. Del. February 14, 2025)	Docket No. 174, Ex. A
7	In re GigaMonster Networks, LLC, No. 23-10051 (JKS), D.I. 3, at 10 ¶ 23 (Bankr. D. Del. Jan. 16, 2023) (First-Day Declaration)	
8	In re GigaMonster Networks, LLC, No. 23-10051 (JKS), D.I. 113, at 21 ¶ 28 (Bankr. D. Del. Feb. 8, 2023) (Bidding Procedures Order)	
9	In re GigaMonster Networks, LLC, No. 23-10051 (JKS), D.I. 235, at 12 ¶ P (Bankr. D. Del. Mar. 3, 2023) (Sale Order)	
10	In re Medly Health Inc., No. 22-11257 (KBO), D.I. 3, at 12 ¶ 42 (Bankr. D. Del. Dec. 9, 2022) (First-Day Declaration)	
11	In re Medly Health Inc., No. 22-11257 (KBO), D.I. 15, at ¶¶ 10, 21, 60 (Bankr. D. Del. Dec. 9, 2022) (Bidding Procedures Motion)	
12	In re RTI Holding Co., LLC, No. 20-12456 (JTD), D.I. 3, at 8 ¶ 19 (Bankr. D. Del. Oct. 7, 2020) (First-Day Declaration)	
13	In re RTI Holding Co., LLC, No. 20-12456 (JTD), D.I. 585, at 11 ¶ 20 (Bankr. D. Del. Nov. 20, 2020) (Bidding Procedures Order)	
14	In re BL Restaurants Holding, LLC, No. 20-10156 (MFW), D.I. 4, at 9 ¶ 22 (Bankr. D. Del. Jan. 27, 2020) (First-Day Declaration)	
15	In re BL Restaurants Holding, LLC, No. 20-10156 (MFW), D.I. 17, at 6 ¶ 15 (Bankr. D. Del. Jan. 27, 2020) (Bidding Procedures Motion)	
16	In re BL Restaurants Holding, LLC, No. 20-10156 (MFW), D.I. 227 at 3 ¶ D (Bankr. D. Del. Feb. 28, 2020) (Bidding Procedures Order)	
17	In re BL Restaurants Holding, LLC, No. 20-10156 (MFW), D.I. 402, at 4 ¶ G (Bankr. D. Del. Apr. 29, 2020) (Sale Order)	
18	In re Forever 21, Inc., No. 19-12122 (KG), D.I. 802, at 3 ¶ 5 (Bankr. D. Del. Jan. 30, 2020) (Bidding Procedures Motion)	
19	In re Forever 21, Inc., No. 19-12122 (KG), D.I. 854, at ¶¶ I, 6 (Bankr. D. Del. Feb. 4, 2020) (Bidding Procedures Order)	

Exhibit #	Description	Docket No.
20	In re Consolidated Infrastructure Group, Inc., No. 19-10165 (BLS), D.I. 54, at 4 ¶ 9 (Bankr. D. Del. Feb. 12, 2019) (Asset Sale Advisor Retention Application)	
21	In re Consolidated Infrastructure Group, Inc., No. 19-10165 (BLS), D.I. 200, at 3, 8 ¶ M (Bankr. D. Del. May 29, 2019) (Sale Order)	
22	In re Hobbico, Inc., No. 18-10055 (KG), D.I. 34 at 23 ¶ 73 (Bankr. D. Del. Mar. 14, 2018) (Amended First-Day Declaration)	
23	In re Hobbico, Inc., No. 18-10055 (KG), D.I. 243, at 7 ¶ 10 (Bankr. D. Del. Mar. 14, 2018) (Bidding Procedures Order)	
24	In re Hobbico, Inc., No. 18-10055 (KG), D.I. 316-2, at 8 ¶ W (Bankr. D. Del. Apr. 2, 2018) (Sale Order)	
25	In re California Proton Treatment Center, LLC, No. 17-10477 (LSS), D.I. 77, at 4 ¶ 14 (Bankr. D. Del. Mar. 10, 2017) (Investment Banker Retention Application)	
26	In re California Proton Treatment Center, LLC, No. 17-10477 (LSS), D.I. 364, at ¶¶ Q, X (Bankr. D. Del. Sept. 27, 2017) (Sale Order)	
27	In re United Road Towing, Inc., No. 17-10249 (LSS), D.I. 2, at 8 ¶ 22 (Bankr. D. Del. Feb. 6, 2017) (First-Day Declaration)	
28	In re United Road Towing, Inc., No. 17-10249 (LSS), D.I. 66, at 4 ¶ 7 (Bankr. D. Del. Feb. 12, 2017) (Investment Banker Retention Application)	
29	In re United Road Towing, Inc., No. 17-10249 (LSS), D.I. 131, at 12 ¶ 16 (Bankr. D. Del. Mar. 6, 2017) (Bidding Procedures Motion)	
30	In re United Road Towing, Inc., No. 17-10249 (LSS), D.I. 279, at 9 ¶ N (Bankr. D. Del. Apr. 13, 2017) (Sale Order)	
31	In re Constellation Enterprises LLC, No. 16-11213 (CSS), D.I. 12, at 13 ¶ 36 (Bankr. D. Del. June 17, 2016) (First-Day Declaration)	
32	In re Constellation Enterprises LLC, No. 16-11213 (CSS), D.I. 87, at 19 ¶ 22 (Bankr. D. Del. May 25, 2016) (Bidding Procedures Motion)	
33	In re Constellation Enterprises LLC, No. 16-11213 (CSS), D.I. 284, at 2 ¶ 2 (Bankr. D. Del. June 21, 2016) (UCC Bidding Procedures Objection)	

Exhibit #	Description	Docket No.
34	In re Constellation Enterprises LLC, No. 16-11213 (CSS), D.I. 513, at 6 ¶ O (Bankr. D. Del. Aug. 19, 2016) (Sale Order)	
35	In re Mabvax Therapeutics Holdings, Inc., No. 19-10603 (CSS), D.I. 10, at 20 ¶ 56-57, 22 ¶ 62 (Bankr. D. Del. Mar. 21, 2019) (First-Day Declaration)	
36	In re Mabvax Therapeutics Holdings, Inc., No. 19-10603 (CSS), D.I. 141, at 5 ¶ H (Bankr. D. Del. May 7, 2019) (Sale Order)	
37	In re Things Remembered, Inc., No. 19-10234 (CSS), D.I. 4, at 5 ¶ 13, 24 ¶ 57 (Bankr. D. Del. Feb. 6, 2019) (First-Day Declaration)	
38	In re Things Remembered, Inc., No. 19-10234 (CSS), D.I. 292, at 9 ¶ N (Bankr. D. Del. Mar. 6, 2019) (Sale Order)	
39	In re Charlotte Russe Holding, Inc., No. 19-10210 (LSS), D.I. 3, at 13 ¶ 40 (Bankr. D. Del. Feb. 3, 2019) (First-Day Declaration)	
40	In re Charlotte Russe Holding, Inc., No. 19-10210 (LSS), D.I. 199, at 5 ¶ 7, 7 ¶ 15 (Bankr. D. Del. Feb. 21, 2019) (Bidding Procedures Order)	
41	In re Charlotte Russe Holding, Inc., No. 19-10210 (LSS), D.I. 319, at 8 ¶ N (Bankr. D. Del. Mar. 7, 2019) (Sale Order)	
42	In re Charlotte Russe Holding, Inc., No. 19-10210 (LSS), D.I. 367, at 4 ¶ 5 (Bankr. D. Del. Mar. 18, 2019) (Supplemental Sale Motion)	
43	In re Maurice Sporting Goods, Inc., No. 17-12481 (CSS), D.I. 2, at ¶¶ 28, 30 (Bankr. D. Del. Nov. 20, 2017) (First-Day Declaration)	
44	In re Maurice Sporting Goods, Inc., No. 17-12481 (CSS), D.I. 227, at 23 ¶ 13 (Bankr. D. Del. Dec. 28, 2017) (Sale Order)	
45	In re Golfsmith Int'l Holdings, Inc., No. 16-12033 (LSS), D.I. 3, at 29 ¶ 70 (Bankr. D. Del. Sept. 14, 2016) (First Day Declaration)	
46	In re Golfsmith Int'l Holdings, Inc., No. 16-12033 (LSS), D.I. 548, at ¶¶ E, 13 (Bankr. D. Del. Dec. 13, 2016) (Sale Order)	

Exhibit #	Description	Docket No.
47	Motion of the Debtors for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105, 361, 362, 363, 364, 503, 506, 507, and 552 and Bankruptcy Rules 2002, 4001, 6003, 6004, and 9014 (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Superpriority Administrative Expense Status and (B) Adequate Protection to Prepetition Secured Creditors, (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief	Docket No. 14
48	Interim Order Under Bankruptcy Code Sections 105, 361, 362, 363, 364, 503, 506, 507, and 552 and Bankruptcy Rules 2002, 4001, 6003, 6004, and 9014 (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Superpriority Administrative Expense Status and (B) Adequate Protection to Prepetition Secured Creditors, (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief	Docket No. 83
49	In re Mabvax Therapeutics Holdings, Inc., No. 19-10603 (CSS), D.I. 78, at 3 ¶ 5, 5 ¶ 11 (Bankr. D. Del. April 8, 2019) (Bidding Procedures Order)	
50	In re Things Remembered, Inc., No. 19-10234 (CSS), D.I. 150 at 5 ¶ I (Bankr. D. Del. Feb. 21, 2019) (Bidding Procedures Order)	
51	In re Maurice Sporting Goods, Inc., No. 17-12481 (CSS), D.I. 39, at 7 ¶ 13 (Bankr. D. Del. Nov. 21, 2017) (Sale Procedures Motion)	
52	In re Maurice Sporting Goods, Inc., No. 17-12481 (CSS), D.I. 40, at 3 ¶ 2 (Bankr. D. Del. Nov. 21, 2017) (Motion to Shorten Time)	
53	In re Golfsmith Int'l Holdings, Inc., No. 16-12033 (LSS), D.I. 20, at 2 ¶ 2 (Bankr. D. Del. Sept. 14, 2016) (Bidding Procedures Motion)	
54	In re Golfsmith Int'l Holdings, Inc., No. 16-12033 (LSS), D.I. 127-4, at 2 (Bankr. D. Del. Sept. 23, 2016) (Jefferies Retention Order)	

Exhibit #	Description	Docket No.
55	In re Golfsmith Int'l Holdings, Inc., No. 16-12033 (LSS), D.I. 196, at 5 ¶ 4, 6¶ 9 (Bankr. D. Del. Oct. 6, 2016) (Bidding Procedure Order)	
56	In re New Rue21 Holdco, Inc., 24-10939 (BLS), D.I. 19, at 4 ¶ 9 (Bankr. D. Del. May 2, 2024) (First Day Declaration)	
57	In re New Rue21 Holdco, Inc., 24-10939 (BLS), D.I. 194, at 13 Sec. B (Bankr. D. Del. May 23, 2024) (Bidding Procedures Order)	
58	In re Casa Systems, Inc., No. 24-10695 (KBO), D.I. 3, at ¶¶ 82, 86 (Bankr. D. Del. Apr. 3, 2024) (First Day Declaration)	
60	In re Casa Systems, Inc., No. 24-10695 (KBO), D.I. 39, at 7 ¶ 13 (Bankr. D. Del. Mar. 3, 2024) (Bidding Procedures Motion)	
61	In re Casa Systems, Inc., No. 24-10695 (KBO), D.I. 266, at ¶¶ 11, 21 (Bankr. D. Del. May 2, 2024) (Revised Bidding Procedures Order)	
62	In re SC Healthcare Holding, LLC, No. 24-10443 (TMH), D.I. 264, at 5 ¶ 16 (Bankr. D. Del. May 1, 2024) (Bidding Procedures Motion)	
63	In re Casa Systems, Inc., No. 24-10695 (KBO), D.I. 266, at ¶¶ 11, 21 (Bankr. D. Del. May 2, 2024) (Revised Bidding Procedures Order)	
64	In re SC Healthcare Holding, LLC, No. 24-10443 (TMH), D.I. 264, at 5 ¶ 16 (Bankr. D. Del. May 1, 2024) (Bidding Procedures Motion)	
65	In re SC Healthcare Holding, LLC, No. 24-10443 (TMH), D.I. 341, at 5 ¶ 3 (Bankr. D. Del. May 21, 2024) (Bidding Procedures Order)	
66	In re Sientra, Inc., No. 24-10245 (JTD), D.I. 3, at 18 ¶ 46 (Bankr. D. Del. Feb. 12, 2024) (First Day Declaration)	
67	In re Sientra, Inc., No. 24-10245 (JTD), D.I. 123, at ¶ ¶ 8, 13 (Bankr. D. Del. Mar. 5, 2024) (Bidding Procedures Order)	
68	In re Nanostring Technologies, Inc., No.24-10160 (CTG), D.I. 26, at ¶ ¶ 43, 49 (Bankr. D. Del. Feb. 5, 2024) (First Day Declaration)	
	Any document or pleading filed in the above-captioned cases	
	Any exhibit necessary for impeachment and/or rebuttal purposes	

Exhibit #	Description	Docket No.
	Any exhibit identified or offered by any other party	

Reservation of Rights

The Committee reserves all rights, including, without limitation, the right to amend, revise, or supplement this Witness and Exhibit List and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment, rebuttal, or in response to witnesses or evidence offered by any other party. As of the filing of this Witness and Exhibit List: (i) the Debtors have not filed a supporting declaration in support of the Bidding Procedures Motion; and (ii) no depositions have occurred. Accordingly, the Committee expressly reserves the right to further supplement this Witness and Exhibit List as necessary in light of these developments.

Dated: December 14, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Carol E. Thompson
Justin R. Alberto (No. 5126)
Stacy L. Newman (No. 5044)
Carol E. Thompson (No. 6936)
500 Delaware Avenue, Suite 600
Wilmington, DE 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: jalberto@coleschotz.com
snewman@coleschotz.com
cthompson@coleschotz.com

- and -

Seth Van Aalten (admitted *pro hac vice*)
Sarah A. Carnes (admitted *pro hac vice*)
1325 Avenue of the Americas, 19th Floor
New York, NY 10019
Telephone: 212-752-8000

Facsimile: 212-752-8393
Email: svanalten@coleschotz.com
scarnes@coleschotz.com

-and-

KELLEY DRYE & WARREN LLP

Eric R. Wilson (admitted *pro hac vice*)
Jason R. Adams (admitted *pro hac vice*)
Maeghan J. McLoughlin (admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Telephone: (212) 808-7800
Email: ewilson@kelleydrye.com
jadams@kelleydrye.com
mmcloughlin@kelleydrye.com

*Proposed Counsel to the Official
Committee of Unsecured Creditors of American
Signature, Inc., et al.*