

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

\_\_\_\_\_)  
In re: ) Chapter 11  
)  
AMERICAN SIGNATURE, INC., *et al.*,<sup>1</sup> ) Case No. 25-12105 (JKS)  
)  
Debtors. ) (Jointly Administered)  
)  
\_\_\_\_\_) **Re: Docket Nos. 176, 185, 192**

**THIRD AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON DECEMBER 15, 2025 AT 10:30 A.M. EASTERN TIME**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Stickles' Chambers Procedures (<https://www.deb.uscourts.gov/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.

**MATTERS GOING FORWARD**

1. **GOB Motion** – 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 [Filed: 11/24/25] ([Docket No. 18](#)).

Response Deadline: December 10, 2025 at 4:00 p.m. Eastern Time.

<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: 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.

<sup>2</sup> **Amended items appear in bold.**



Responses Received:

- a) United States Trustee's Objection to 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 [Filed: 12/10/25] ([Docket No. 170](#)).
- b) SB360 Capital Partners, LLC's Response in Support of the 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, and Reply to United States Trustee's Objection Thereto [Filed: 12/12/25] ([Docket No. 182](#)).

Replies Filed:

- a) Debtors' Reply 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 [Filed: 12/12/25] ([Docket No. 188](#)).

Related Documents:

- a) Certification of Counsel Submitting Revised 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 [Filed: 11/26/25] ([Docket No. 103](#)).
- b) [Signed] 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 [Filed: 11/26/25] ([Docket No. 104](#)).
- c) Notice of Entry of Interim Order and Final Hearing Regarding 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 [Filed: 11/26/25] ([Docket No. 105](#)).
- d) 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 [Filed: 12/3/25] ([Docket No. 116](#)).
- e) Debtors' Witness and Exhibit List for Hearing on December 15, 2025 at 10:30 a.m. (ET) [Filed: 12/11/25] ([Docket No. 175](#)).

- f) Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/12/25] ([Docket No. 180](#)).
- g) Notice of Filing Proposed Final Order 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 [Filed: 12/12/25] ([Docket No. 181](#)).
- h) United States Trustee's Witness and Exhibit List Relating to Matters Scheduled for Hearing on December 15, 2025 at 10:30 a.m. [Filed: 12/12/25] ([Docket No. 186](#)).
- i) SB360 Capital Partners, LLC Witness and Exhibit List for December 15, 2025 Hearing [Filed: 12/12/25] ([Docket No. 189](#))
- j) Debtors' Motion for Leave to File Late Replies in Support of Bid Procedures Motion and Store Closing Motion [Filed: 12/13/25] ([Docket No. 191](#)).
- k) Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/14/25] ([Docket No. 194](#)).**
- l) Notice of Withdrawal of Notice of Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025 [Filed: 12/14/25] ([Docket No. 195](#)).**
- m) Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/14/25] ([Docket No. 196](#)).**

Status: This matter has been continued to the hearing scheduled for January 7, 2026 at 11:00 a.m. Eastern Time.

2. **Bid Procedures Motion** – 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 [Filed: 11/26/25] ([Docket No. 108](#)).

Response Deadline: December 5, 2025 at 10:00 a.m. Eastern Time. Extended to December 8, 2025 for certain landlords. Extended to December 10, 2025 for the Office of the United States Trustee (the "UST") and the Official Committee of Unsecured Creditors (the "Committee"). Extended to December 11, 2025 for WPG Legacy, LLC ("WPG").

Responses Received:

- a) Limited Objection and Reservation of Rights of Utica Park Place Owner, LLC and Canton Corners Shopping Center, L.L.C. to 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; (III) Granting Related Relief [Filed: 12/5/25] ([Docket No. 130](#)).
- b) United States Trustee's Objection to 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 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 [Filed: 12/10/25] ([Docket No. 171](#)).
- c) Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Approving Bid Procedures and Stalking Horse Agreement [Filed: 12/10/25] ([Docket No. 174](#)).
- d) Informal objections from certain landlords.

Replies Filed:

- a) Debtors' Omnibus Reply in Support of Combined Sale/Bid Procedures Motion [Filed: 12/13/25] ([Docket No. 190](#)).

Related Documents:

- a) Debtors' Witness and Exhibit List for Hearing on December 15, 2025 at 10:30 a.m. (ET) [Filed: 12/11/25] ([Docket No. 175](#)).
- b) Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/12/25] ([Docket No. 180](#)).

- c) United States Trustee's Witness and Exhibit List Relating to Matters Scheduled for Hearing on December 15, 2025 at 10:30 a.m. [Filed: 12/12/25] ([Docket No. 186](#)).
- d) Declaration of Boris J. Steffen in Support of the Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Approving Bid Procedures and Stalking Horse Agreement [Filed: 12/12/25] ([Docket No. 187](#)).
- e) Debtors' Motion for Leave to File Late Replies in Support of Bid Procedures Motion and Store Closing Motion [Filed: 12/13/25] ([Docket No. 191](#)).
- f) **Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/14/25] ([Docket No. 194](#)).**
- g) **Notice of Withdrawal of Notice of Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025 [Filed: 12/14/25] ([Docket No. 195](#)).**
- h) **Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for December 15, 2025, at 10:30 a.m. (Prevailing Eastern Time) [Filed: 12/14/25] ([Docket No. 196](#)).**

Status: This matter will go forward. Rudolph Morando, Managing Director with Berkeley Research Group, is expected to testify about the Debtors' business judgment in support of the proposed bidding procedures and buyer protections. Teresa C. Kohl, Managing Director with SSG Capital Advisors is expected to testify about the reasonableness of the bidding procedures and buyer protections under the circumstances. The Debtors have filed with the reply a revised proposed order that responds to a number of objections and informal comments. The Debtors continue to respond to remaining objections and comments. To the extent any objections or informal comments remain unresolved, they will be addressed at the hearing.

Dated: December 15, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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*Proposed Counsel to the Debtors and Debtors in Possession*