

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)

Objection Deadline: January 19, 2026 at 4:00 p.m. (ET)

Hearing Date: February 4, 2026 at 10:00 a.m. (ET)

APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING
THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF DECEMBER 8, 2025

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) hereby files this application (the “Application”) for entry of an order, substantially in the form attached hereto as **Exhibit A**, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of United States Bankruptcy Court for the District of Delaware (the “Local Rules”) authorizing and approving the employment of Province, LLC (“Province”) as financial advisor to the Committee in connection with the Debtors’ chapter 11 cases, effective as of December 8, 2025. In support of the Application, the Committee also files the *Declaration of Sanjuro Kietlinski* (the “Kietlinski Declaration”), attached hereto as **Exhibit B** and incorporated herein by reference. In support of the Application, the Committee respectfully represents as follows:

¹ The Debtors in these chapter 11 cases (these “Chapter 11 Cases”) are, 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.



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BACKGROUND

1. On November 22, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. These chapter 11 cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). Since the Petition Date, the Debtors have remained in possession of their assets and have continued to operate and manage their business as debtors-in-possession pursuant to sections 1107(a) and 1108(a) of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases.

2. On December 4, 2025, the Office of the United States Trustee for Region 3 (the “U.S. Trustee”) appointed a seven-member Committee consisting of: (i) Man Wah MCO; (ii) H317 Logistics, LLC; (iii) Riverside Furniture Corp.; (iv) Holland House; (v) Tempur World, LLC; (vi) Everest Technologies, Inc.; and (vii) Realty Income Corp.² Man Wah MCO and Realty Income Corp. serve as the co-chairs of the Committee.

3. On December 5, 2025, the Committee selected Kelley Drye & Warren LLP (“Kelley Drye”) as its lead counsel and Cole Schotz as co-counsel. On December 8, 2025, the Committee selected Province, LLC (“Province”) as its proposed financial advisor.

4. Province has extensive experience representing official creditors’ committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases, including, as (i) financial advisor to the official committees of unsecured creditors of A.B.C. Carpet, AgileThought, Alex and Ani, American Tire, Armstrong Flooring, Aruze Gaming, Ascena Group, Avadim Health, Avon Products, Barretts Minerals, Benitago, BL Restaurants Holding, Boundless Broadband, Carbonlite Holdings, CarePoint Health, Cherry Man Industries, Claire’s Holdings,

² Docket No. 119.

Conn's, Inc., Cyprus Mines, David's Bridal, DCL Holdings (USA), Del Monte, Desktop Metal, Destination Maternity, DirectBuy Home Improvement, Eastern Outfitters, EHT US1 (Eagle Hospitality), Endo International, Exactech, Express, Forever 21, Francesca's Holding Corporation, Harvest Sherwood, Honx, Hooters of America, Insys Therapeutics, Independent Pet Partners, Invacare, J Crew, Kal Freight, LifeScan Global, Lucky's Market, L'Occitane, Lumio Holdings, Mallinckrodt, Meyer Burger, Mosaic Companies, Mountain Express Oil Company, Nielsen & Bainbridge (NBD Home), Neopharma, Noble House, One Web, Papyrus, Path Medical, Pier 1, PBS Brand Co. (Punch Bowl), Purdue Pharma, Prime Core Technologies, Prospect Medical, Restoration Forest Products Group, LLC, Reverse Mortgage, Revlon, Salt Life, Sientra, SiO2 Medical Products, South Hills Operations, Spicey Partners Real Estate Holdings, LLC, Stimwave Technologies, Surgalign, TECT Aerospace Group, The Rockport Company, True Religion Apparel, True Value, Tuesday Morning, US Magnesium, Virgin Orbit, Water Gremlin, Wesco Aircraft, White Stallion Energy, Whittaker, Clark & Daniels, and Winsor Terrace; (ii) financial advisor to the debtors 4E Brands, Basic Energy Services, Cherry Man Industries, Cinemex Holdings USA, Codiak BioSciences, Coin Cloud, Frontsight Management, Penthouse Global Media, Rhodium Encore, Superior Linen, True Religion Apparel, WeWork and Woodbridge Group of Companies; and (iii) trustee or trustee advisor in Aegean Marine Petroleum, Advance Watch, American Apparel, Aruze Gaming, Borden Dairy, CS Mining, Cycle Force, DCL, EBH Topco, Eclipse Berry Farms, Energy & Exploration (ENXP), Fieldwood, Gump's, Invacare, La Paloma Generating Company, Limetree Bay Services, Invacare, Mallinckrodt, Maxus Energy, Neogenix, PBS Brand Co. (Punch Bowl), Promise Healthcare Group, Proterra, RadioShack Corporation, RMIT (Reverse Mortgage), Samson Resources, SiO2, Stimwave Technologies, and Vesta Holdings, among others.

JURISDICTION AND VENUE

5. 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 and the Amended Standing Order of Reference for 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).

6. Pursuant to Local Rule 9013-1(f), the Committee consents to the entry of a final order or judgment by the Court in connection with this Application 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.

7. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

8. The statutory and other bases for relief requested in this Application are sections 328(a) and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1.

RELIEF REQUESTED

9. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit A**, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain Province as its financial advisor in these chapter 11 cases. The Committee selected Province in furtherance of the efficient administration of the estates on behalf of the Committee. The Committee seeks to retain Province effective as of December 8, 2025, the date that Province began providing services to the Committee. The Committee believes that such

retention is appropriate in these chapter 11 cases because the Committee required Province's assistance prior to such time as a retention application could be submitted to the Court due to the exigencies of these cases.

SCOPE OF EMPLOYMENT

10. Subject to further order of this Court, the services Province has rendered and may be required to render for the Committee, include without limitation, the following:

- a. becoming familiar with and analyzing the Debtor's DIP/Cash Collateral budget, assets and liabilities, and overall financial condition;
- b. reviewing financial and operational information furnished by the Debtor;
- c. monitoring the sale process, interfacing with the Debtor's professionals, and advising the Committee regarding the process;
- d. scrutinizing the economic terms of various agreements, including, but not limited to, various professional retentions;
- e. analyzing the Debtor's proposed business plans and developing alternative scenarios, if necessary;
- f. assessing the Debtor's various pleadings and proposed treatment of unsecured creditor claims therefrom;
- g. preparing, or reviewing as applicable, avoidance action and claim analyses;
- h. assisting the Committee in reviewing the Debtor's financial reports, including, but not limited to, statements of financial affairs, schedules of assets and liabilities, DIP/Cash Collateral budgets, and monthly operating reports;
- i. advising the Committee on the current state of this chapter 11 case;
- j. advising the Committee in negotiations with the Debtor and third parties as necessary;
- k. if necessary, participating as a witness in hearings before the Court with respect to matters upon which Province has provided advice; and
- l. other activities as are approved by the Committee, the Committee's counsel, and as agreed to by Province.

NO ADVERSE INTEREST OF PROFESSIONALS

11. To the best of the Committee's knowledge and based upon the Kietlinski Declaration attached hereto, neither Province nor any of its employees have any connection with

any party in interest, their attorneys or accountants, other than as set forth in the Kietlinski Declaration.

12. To the best of the Committee's knowledge, except as provided in the Kietlinski Declaration, neither Province, nor any of its employees represent any interest adverse to that of the Committee in the matters on which they are to be retained.

13. While Province has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties-in-interest, it is possible that connections with some parties-in-interest have not yet been identified. Should Province, through its continuing efforts, learn of any new connections of the nature described above, Province will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

14. Province represents many debtors, trustees, and committees in other bankruptcy cases, and the debtors, the members of those committees, or those estates may be creditors of the Debtors. However, Province will not represent those debtors, committees, or estates with respect to any claims that they may collectively or individually have against the Debtors.

PROFESSIONAL COMPENSATION

15. The Committee desires to employ Province and to have Province compensated with reasonable fees to be determined by the Court. No compensation will be paid to Province except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court. Province has received no retainer in these cases to represent the Committee. Neither the Committee nor any of its members (or their representatives) are or will be liable for any fees or costs incurred by Province in its representation of the Committee. Province's current standard hourly rates are:

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$850-\$1,450

Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$350-\$825
Paraprofessional / Admin	\$270-\$450

16. Effective as of January 1, 2026, Province is raising its market rates for its services of like kind to the following revised hourly rates, (for which the Application shall serve as notice thereof):

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$900-\$1,600
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$370-\$750
Paraprofessional/Admin /Interns	\$270-\$380

17. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases.

18. In addition, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

NOTICE

19. Notice of the Application will be given to the following parties or their counsel: (i) the Debtors; (ii) the Office of the U.S. Trustee for the District of Delaware; and (iii) any party that requests service pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested and the circumstances surrounding the Chapter 11 Cases, no other or further notice is required or necessary.


NO PRIOR REQUEST

20. No prior request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Committee requests that the Court enter the order (the “Order”) annexed hereto as **Exhibit A**, (i) approving the retention and employment of Province as its financial advisor, effective as December 8, 2025, to render services as described above with compensation to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow; and (ii) granting the Committee such other and further relief as the Court deems just and proper.

Dated: December 29, 2025

**THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF
AMERICAN SIGNATURE, INC., ET AL.**

By: /s/ 
Michael DiGiacomo solely in his capacity
as an authorized signatory of Realty
Income Corp., as Co-Chair of the Official
Committee of Unsecured Creditors of
American Signature, Inc., *et al.*

**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)

Objection Deadline: January 19, 2026 at 4:00 p.m. (ET)

Hearing Date: February 4, 2026 at 10:00 a.m. (ET)

**NOTICE OF APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT OF
PROVINCE, LLP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EFFECTIVE AS OF DECEMBER 8, 2025**

PLEASE TAKE NOTICE that on December 29, 2025, 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”), filed the attached *Application For Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Application shall conform with the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the District of Delaware and shall be filed with the

¹ The Debtors in these chapter 11 cases (these “Chapter 11 Cases”) are, 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.

Court and served upon the undersigned so as to be received no later than **4:00 p.m. (ET) on January 19, 2026.**

PLEASE TAKE FURTHER NOTICE that the Application will be considered at a hearing on **February 4, 2026, at 10:00 a.m. (ET)**, or as soon thereafter as counsel may be heard, before the Honorable J. Kate Stickles, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, AN ORDER MAY BE ENTERED GRANTING THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 29, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Carol E. Thompson
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*Proposed Counsel to the Official Committee of
Unsecured Creditors of American Signature, Inc.,
et al.*

EXHIBIT A

Proposed Order

**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)

Related Docket No. ____

**ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT
OF PROVINCE, LLC AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
EFFECTIVE AS OF DECEMBER 8, 2025**

This matter came before the Court on the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 2025* (the “Application”)² and the *Declaration of Sanjuro Kietlinski* filed in support of the Application (the “Kietlinski Declaration”) both filed by the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession, pursuant to sections 328(a) and 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) for an order authorizing and approving the retention and employment of Province, LLC (“Province”) as financial advisor for the Committee in these chapter 11 cases; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. § 1334; and

¹ The Debtors in these chapter 11 cases (these “Chapter 11 Cases”) are, 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.

consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and it appearing to the Court that the said Application should be approved, it is, therefore, ORDERED that:

1. The Application is granted as set forth herein.
2. Pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, the Committee is authorized to employ and retain Province as financial advisor to the Committee effective as of December 8, 2025.
3. Province shall apply for compensation for professional services rendered and reimbursement of expenses reasonably and actually incurred in connection with the Debtors' cases as set forth in the Application and in compliance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the Local Rules, and any other applicable procedures and orders of this Court.
4. Notwithstanding anything to the contrary in the Application or the Kietlinski Declaration, Province shall not seek reimbursement of any fees or costs arising from the defense of any of Province's fee applications in these chapter 11 cases.
5. Notwithstanding anything in the Application to the contrary, Province shall (i) to the extent that it uses the services of independent contractors or subcontractors (collectively, the "Contractors") in these cases, pass through the cost of such Contractors at the same rate that Province pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for Province; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014.

6. Province shall provide ten (10) business days' notice to the Debtor, the U.S. Trustee, and the Committee prior to any increases in the rates set forth in the Application, and such notice must be filed with the Court; *provided however*, the rate increase noted in the Application to occur on January 1, 2026 is hereby approved to occur on January 1, 2026 without further notice. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

7. The Committee and Province are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

8. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

EXHIBIT B

Declaration of Sanjuro Kietlinski

**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 SANJURO KIETLINSKI IN SUPPORT OF
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING AND
APPROVING THE EMPLOYMENT OF PROVINCE, LLC AS FINANCIAL
ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF DECEMBER 8, 2025**

I, Sanjuro Kietlinski, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure and Rule 2014-1 of the Local Rules as follows:

1. I am a Partner with Province, LLC (“Province”), which is a financial advisory firm with its principal office located at 2360 Corporate Circle, Suite 340, Henderson, Nevada 89074. Province also has offices in the Detroit, Greenwich, Los Angeles, Miami, and New York metro areas. I am authorized to submit this declaration (the “Declaration”) in support of the *Application for Entry of an Order Authorizing and Approving the Employment of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of December 8, 2025* (the “Application”).

2. Province’s corporate structure, including its subsidiaries, is as follows: Province, LLC is a Delaware limited liability company, and Province’s only two subsidiaries, which are

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wholly owned, are Province Fiduciary Services, LLC, a Nevada limited liability company, and O’Keefe & Associates Consulting, LLC, a Michigan limited liability company (collectively “Province”). All of Province’s conflicts checks and related disclosures include any connections of Province’s subsidiaries.

3. Neither I, Province, nor any employee thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any other parties in interest herein, or their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as set forth herein.

4. This Declaration is submitted pursuant to sections 328 and 1103 of Title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 2014-1 and 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) in support of the Application for the entry of an order approving the retention of Province as financial advisor to the Committee, effective December 8, 2025.

5. In connection with its proposed retention by the Committee in these chapter 11 cases and in preparing this Declaration, Province used a set of procedures developed to ensure compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules regarding the retention of professionals (the “Retention Procedures”). Pursuant to the Retention Procedures, and under my direction and supervision, Province researched its client connections database, which includes all engagements that concluded within the past twenty-four (24) months, to determine whether it has relationships with any of the entities that were identified to Province as creditors or parties-in-interest in these chapter 11 cases (the “Entity List”) a copy which is attached hereto as **Schedule 1**. To the extent such a search indicated that Province has a

relationship with any of the entities on the Entity List, the identities of such entities and Province's relationship with such entities is disclosed in the attached **Schedule 2**.

6. Province sent an email questionnaire to each employee inquiring as to whether each employee or any member(s) of his or her household:

- i. owns any debt or equity securities of the Debtors or their non-debtor affiliates;
- ii. holds a claim against or interest adverse to the Debtors or their non-debtor affiliates;
- iii. is or was an officer, director, or employee of the Debtors or their non-debtor affiliates;
- iv. is related to or has any connections to any Bankruptcy Judge in the United States Bankruptcy Court for the District of Delaware;
- v. is related to or has any connections to anyone working in the Office of the United States Trustee for the District of Delaware;
- vi. was an officer, director or employee of the Debtors within two years prior to the Petition Date; or
- vii. has a connection with a party in interest listed on the Entity List.

7. Province received no employee responses indicating a connection to any of the parties listed on the Entity List.

8. Based on the result of the foregoing searches and employee questionnaire and except as may have been expressly disclosed herein, I have been able to ascertain after diligent inquiry that to the best of my knowledge, Province (i) does not represent any entity having an adverse interest in connection with these chapter 11 cases and (ii) does not represent or hold an interest adverse to the interest of the Debtors or their estates with respect to the matters on which Province is to be employed. Moreover, Province and its subsidiaries are disinterested within the meaning of section 101(14) of the Bankruptcy Code, in that neither I, Province, any Province

subsidiary, nor any of their principals, employees (including those working on this engagement) or associates:

- a. are creditors, equity security holders or insiders of the Debtors;
- b. are or were within two years before the Petition Date, a director, officer or employee of the Debtors;
- c. have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtors or for any other reason; or
- d. hold any debt or equity securities of the Debtors.

9. As a part of Province's financial advisory practice, Province's clientele includes: debtors, creditors and other statutory committees, institutional creditors, asset purchasers, venture capitalists, secured parties, lessors, contract parties, equity holders, directors and officers, court-appointed fiduciaries, plan sponsors, indenture trustees, and bond insurers. The Debtors have numerous creditors and other parties-in-interest. Province may have in the past represented and may presently or in the future represent or be deemed adverse to, creditors or parties-in-interest in addition to those specifically disclosed in **Schedule 2** in matters unrelated to these chapter 11 cases. Province believes that its representation of such creditors or other parties in such other matters has not affected and will not affect its representation of the Committee in these proceedings.

10. Except as otherwise set forth herein and in **Schedule 2**, insofar as I have been able to ascertain, the principals, associates and staff members of Province do not have any connection with the Debtors, the Debtors' officers and directors, the Debtors' creditors, the Debtors' equity security holders and other known parties-in-interests or their respective professionals.

11. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been

able to ascertain, is related to the bankruptcy judge assigned to the above-captioned chapter 11 cases.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, neither I, nor any principal, associate or staff member of Province, insofar as I have been able to ascertain, has a connection to the U.S. Trustee or any person employed in the office of the U.S. Trustee.

13. Despite the substantial efforts described above to identify and disclose potential conflicts and connections with parties-in-interest in these cases, neither I nor Province is able to conclusively identify all potential relationships or state with absolute certainty that every client representation or other connection of Province has been disclosed. To the extent Province discovers any facts or additional information during the period of Province's retention that requires disclosure, Province will supplement this Declaration to disclose such information.

14. Province has neither received any retainer nor any payment from the Debtors nor the Committee, nor has it received any promise of payment, during the one-year period prior to the filing of the Debtors' petitions. No compensation has been paid or promised to be paid from a source other than the Debtors' estates in these chapter 11 cases. No promises have been received by Province nor by any advisors or attorneys thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code. Province has no agreement with any other entity to share with such entity any compensation received by Province in connection with these chapter 11 cases, except among employees of Province. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by Province in its representation of the Committee.

15. Province intends to apply for compensation for professional services rendered in connection with these chapter 11 cases subject to approval of this Court as stated in the Application, and in compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Province.

16. Province's current standard hourly rates are:

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$850-\$1,450
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$350-\$825
Paraprofessional / Admin	\$270-\$450

17. Effective as of January 1, 2026, Province is raising its market rates for its services of like kind to the following revised hourly rates, (for which the Application shall serve as notice thereof):

<u>Professional Level</u>	<u>Per Hour (USD)</u>
Managing Directors and Partners	\$900-\$1,600
Vice Presidents, Directors, and Senior Directors	\$700-\$1,050
Analysts, Associates, and Senior Associates	\$370-\$750
Paraprofessional/Admin /Interns	\$270-\$380

18. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Province intends to provide notice to the Debtors, the Committee, and the U.S. Trustee before implementing any increases in Province's rates for professionals working on these chapter 11 cases.

19. In addition to the fees described above, Province will bill for all out-of-pocket expenses reasonably and actually incurred by Province in connection with the matters contemplated by this Application.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 29, 2025

By: /s/ Sanjuro Kietlinksi
Sanjuro Kietlinski
Partner

Schedule 1

Entity List

Debtors

ASI Elston LLC
ASI Thomasville LLC
American Signature Home Inc.
American Signature USA Inc.
American Signature Woodbridge LLC
American Signature, Inc.
ASI - LaPorte LLC
ASI POLARIS LLC
ASI Pure Promise Insurance LLC

Current and Former Affiliates

Kroehler Corporation
Kroehler Furniture Mfg. Co., Inc.
Luxury Delivery Service, Inc.
Schottenstein Stores Corporation
Value City Furniture, Inc.

Current Directors and Officers

Brian T. Strayton
Deana Carrington
Dena Schilling
Eric Jackson
Eric R. Duerksen
George Hunter
George Vemadakis
Jay L. Schottenstein
Jeffry D. Swanson
Jim Dierker
Joseph A. Schottenstein
Kelly Routhier
Kevin Hughes
Melita Garrett Abbey
Patrick J. Sanderson
Richard Favata
Steven D. Rabe
Suzanne Kiggin
Tod H. Friedman
William R. Kugel

5% or More Equity Holders

Jay L. Schottenstein
Schottenstein Stores Corporation

Bankruptcy Judges

Chief Judge Karen B. Owens
Judge Brendan L. Shannon
Judge Craig T. Goldblatt
Judge J. Kate Stickles
Judge John T. Dorsey
Judge Laurie Selber Silverstein
Judge Mary F. Walrath
Judge Tomas M. Horan

U.S. Trustee Office Personnel

Andrew Vara
Benjamin Hackman
Christine Green
Diane Giordano
Dion Wynn
Edith A. Serrano
Elizabeth Thomas
Hannah M. Mccollum
Hawa Konde
Holly Dice
James R. O'malley
Jane Leamy
Jonathan Lipshie
Jonathan Nyaku
Joseph Cudia
Joseph McMahon
Lauren Attix
Linda Casey
Linda Richenderfer
Malcolm M. Bates
Michael Girello
Nyanquoi Jones
Richard Schepacarter
Rosa Sierra-Fox
Shakima L. Dortch
Timothy J. Fox, Jr.

Employee Benefit Providers

Anthem
Anthem Blue Cross And Blue Shield
BenefitHub

Carelonrx Through Anthem
Cigna
Express Scripts
Fidelity
Hinge Health
Lark Through Anthem
Legalshield
MetLife
Omada
Prudential
Talkspace Through Anthem EAP
VSP

Banks

Alex Brown
Morgan Stanley
PNC Bank, National Association
Raymond James
The Huntington National Bank

Debtor Professionals

Berkeley Research Group, LLC
C Street Advisory Group, LLC
Pachulski Stang Ziehl & Jones Llp
SSG Advisors, LLC

Lender Professionals

Choate, Hall & Stewart LLP

Insurance Providers

Ace American Insurance Co
American Guarantee & Liability Insurance Co
American International Reinsurance Co Ltd
Amwins Insurance Brokerage LLC
Arch Insurance Company
Aspen Insurance Uk Limited
Aspen Specialty Insurance Company
Atlantic Security Ltd.
Chubb Bermuda Insurance Ltd.
Cobbs Allen Capital LLC
Crc Group
Crum & Forster Specialty Insurance Company
Endurance American Specialty Ins Co
Everest Indemnity Insurance Co
Everest International Assurance Ltd.
Everest National Insurance Co

Factory Mutual Insurance Company
Freedom Specialty Insurance Co
Gai Insurance Company Limited
Gemini Insurance Company
Great American Assurance Company
Hanseatic Insurance Company Ltd.
Houston Casualty Company
Incline Casualty Company
Insurance Company of the State of PA
IOA National Inc.
Lexington Insurance Company
Liberty Insurance Underwriters Inc
Magna Carta Insurance, Ltd
Midvale Indemnity Company
Navigators Insurance Company
RSUI Indemnity Company
R-T Specialty, LLC - Burbank
Scottsdale Insurance Company
Starr Indemnity & Liability Co
Steadfast Insurance Company
The Charter Oak Fire Insurance Company
The Travelers Indemnity Company
The Travelers Indemnity Company of Connecticut
Travelers Excess And Surplus Lines Company
Travelers Property Casualty Company of America
United Specialty Insurance Company
US Specialty Insurance Co
Westchester Surplus Lines Insurance Co
XL Specialty Insurance Co
Zurich American Ins Co of IL

Lenders and Secured Creditors

PNC Bank, National Association
Second Avenue Capital Partners LLC

Shippers and Distribution Centers

AG Container Transport LLC
Ahm Furniture Service LLC
Alabama Motor Express Inc
American Global Logistics LLC
Ascend LLC
ATS Inc
Axle Logistics LLC
Broadleaf Contracting Inc
Bungii LLC
Castera Transportation

Circle Express Inc
Cosco Container Lines America
Coyote Logistics LLC
Custom Transport Inc
Dolly Inc
Evans Delivery Co Inc
Forward Air Corporation
Franklin Logistics Co LLC
Hapag-Lloyd (America) LLC
Jb Hunt Transport Inc
Keystone Lines
Landstar Inway Inc
LV Trucking Inc
Mediterranean Shipping Co(Usa)
MSC Per Diem Dept
Rapid Response Inc
Robert Bearden Inc
Schneider National Carriers
Silvan Trucking LLC
Total Transportation of Ms
Transport One Inc
Triumph Business Capital
Unique Logistics International
UST Logistical Systems
Wex Bank
Wintrust Bank, N.A.
Zim Shipping Finance Limited
Zim Shipping Per Diem Dept

Surety and Letters of Credit

American Alternative Insurance
American Express Travel
Broadstone Avf Michigan, LLC
Ohio Bureau of Workers Compensation
The CIT Group
The Travelers Indemnity Company
Trimont LLC
Wells Fargo

Utility Providers

Ameren Illinois Company
American Electric Power Co.
Aqua Ohio Inc.
Artesian Water Company Inc.
Athena Energy Services
Atmos Energy Corporation

AW Metering Services LLC
Belmont County Water & Sewer
BGE
Caseyville Township Sewer Syst
Centerpoint Energy Services
Charles County Government
Charter Township of Canton
Charter Township of Clinton
Charter Twnshp of Chesterfield
Chesterfield County VA
Citizens Gas & Coke Utility
City of Altamonte Springs
City of Calumet City
City of Charlotte
City of Chicago
City of Clarksville Department
City of Clarksville Tenn
City of Columbia
City of Cuyahoga Falls
City of Daytona Beach
City of Dearborn
City of East Point
City of Franklin
City of Fredericksburg
City of Grand Rapids
City of Hagerstown
City of Joliet
City of Lansing, By Its Board
City of Northlake
City of Novi
City of Portage
City of Richmond
City of Sandusky Acct Office
City of St Peters
City of Taylor Water Dept
City of Toledo
City of Traverse City
City of Utica
City of Virginia Beach
City of Westland
Cobb Place Property LLC
Columbia Gas
Columbia Gas of Kentucky
Columbia Gas of Maryland
Columbia Gas of Ohio
Columbia Gas of Virginia

Columbus - City Treasurer
 Commonwealth Edison Company
 Constellation Energy Services
 Constellation Newenergy Inc
 Consumers Energy Company
 County of Henrico
 Cranberry Township
 Dayton Power And Light Co.
 Dekalb County
 Delmarva Power
 Delta Charter Township
 Direct Energy Marketing Inc.
 Dominion East Ohio
 Dominion Energy South
 Dominion Virginia Power
 Downers Grove Sanitary District
 DTE Energy
 Duke Energy
 Duquesne Light Company
 Edge Properties LLC
 EMC Natural Gas Inc.
 Engie North America Inc
 Evansville Water And Sewer
 Fairfax County Water Authority
 Flint Township
 Florence Water And Sewer
 Florida Power & Light Company
 Franklin County Sanitary
 G&I IX Empire JV DLC LLC
 Georgia Power Company
 Grand Traverse County Dpw
 Greenwood Sanitation
 Gwinnett County Dept of Water
 Hampton Roads Sanitation Distr
 Hillsborough County Water Dept
 Huntington National Bank
 Huntington Sanitary Board
 IGS Ventures Inc
 Indiana-American Water Co. Inc.
 Indianapolis Power & Light Co.
 JEA
 Kentucky American Water Co.
 Kentucky Utilities Co.
 Kochville Township
 Lake County Dept of Utilities
 LDC Funding LLC

Lexington Fayette
 Louisville Gas & Electric Co.
 Louisville Water Co.
 Lower Paxton Township
 Mahoning Cty Sanitary Engineer
 Mallory Valley Utility District
 Manatee County Utilities Dept.
 Merrillville Conservancy Dist.
 Miami-Dade Water & Sewer
 Middle Tennessee Electric
 Mishawaka Utilities
 Monongahela Power Company
 Monroe County Water Authority
 Monroeville Water Authority
 Montgomery Cnty Water Services
 Mountaineer Gas
 Murfreesboro Water Resources
 Nashville Electric
 National Fuel Gas Dist. Corp
 National Grid
 Newport News Waterworks
 North Shore Gas Company
 Northern Illinois Gas Company
 Northern Indiana Public
 NYSEG
 Ohio Edison Company
 Orlando Utilities Commission
 Palmetto Utilities Inc.
 Parkersburg Utility Board
 Pennsylvania Power Company
 Pennsylvania-American
 Piedmont Natural Gas Co.
 Pleasant Hills Authority
 Potomac Electric Power Co.
 PPL Electric Utilities
 Prince William County Service
 Profile Energy Inc.
 Rochester Gas And Electric
 Semco Energy Inc.
 Silver Spring Township
 Site Centers Corp.
 South Central Power Co.
 South Stickney Sanitary Dist
 Southern Maryland Electric
 Southstar Energy Services LLC
 Spire Missouri Inc.

Suburban Natural Gas Company
 Tampa Electric Company
 The City of Ann Arbor
 The Cleveland Electric
 The East Ohio Gas Company
 The Peoples Gas Light And Coke
 The Potomac Edison Company
 Toledo Edison
 Town of Henrietta
 Town of Plainfield
 Treasurer of Spotsylvania
 UGI Utilities Inc.
 Union Electric Company
 Veolia Water Pennsylvania Inc.
 Village of Downers Grove
 Village of Gurnee
 Village of Orland Park
 Village of Schaumburg
 Virginia Natural Gas Inc.
 Washington Gas
 Waste Harmonics LLC
 WV-American Water Co.

Landlords

1731 Central Park, LLC
 2015 Wesel Boulevard LLC
 2195 Harlem Road Leasing LLC
 4300 Venture 34910 LLC
 6100 Pacific, LLC
 7500 Brookpark LLC
 AILSA 5109, LLC
 Alex Hepper
 ALISUE LLC
 American Signature of Woodbridge, LLC Ann M.
 Busby
 ASI Owned
 ASI Sunrise, LLC
 B&G Properties Limited Partnership
 Balgot Realty Corporation
 Bel Air Plaza Limited Partnership
 Belden Park Delaware, LLC
 Blanding Partners, LLC
 BRE Retail Residual NC Owner L.P.
 Brian McDermott, M.D.
 Brixmor Holdings 10 SPE, LLC
 Brixmor Operating Partnership 2, LLC

Brixmor Property Group
 Brixmor/IA Regency Park SC, LLC
 Broad Street FF, LLC
 Broadstone Net Lease, Inc.
 BV1 Alum Creek Drive Holdings, LLC
 Canton Corners Ford Road LLC
 Carl T Julio, Edward V & Anna Julio PTR
 Charles Triangle, LLC
 Chippewa Center, LLC
 Cobb Place Shops LLC
 Corvair Furniture Manufacturing Co., Inc. CPP
 River Falls II LLC
 CPP River Falls LLC
 Crossings at Hobart-I LLC
 CTO24 Carolina LLC
 Dabaja Fairlane North Properties LLC
 DDRTC Heritage Pavilion LLC
 Decar Realty, LLC
 DIAJEFF LLC
 Dr. Julian G. Busby, Jr.
 Easton Market SC, LLC
 EASTPOINT MALL
 Elston Leavitt LLC
 Exeter 11266 Enterprise, LLC
 Federal Realty Investment Trust
 FR Montrose Crossing LLC
 Franklin Square Drive, LLC
 GPT Managed Holdings. LP
 Gregory Camarco
 GSA I SPE, LLC
 Hill Management Services, Inc.
 Holiday Station Properties, LLC
 HRE/MStreet Turner Hill, LLC
 JLP Beaver creek, LLC
 JLP-Baileys Cross Roads VA LLC
 JLP-BEAVERCREEK LLC
 JLP-Chesapeake LLC
 JLP-Cranberry, LLC
 JLP-FAIRVIEW HEIGHTS, LLC
 JLP-Florence KY, LLC
 JLP-Harvard Park LLC
 JLPK-Dale Mabry LLC
 JLP-Madison LLC
 JLP-Orland Park, LLC
 JLP-Plainfield LLC
 JLP-Richmond, LLC

JLP-TOLEDO MONROE, LLC	Sir Barton Place LLC
JLP-Youngstown, LLC	Skyline Seven Real Estate
Jubilee Coolsprings LLC	Spark Realty Solutions, Inc.
Jubilee Limited Partnership	SPG ASI Polaris LLC
Jubilee-Sawmill, LLC	Spirit Realty, L.P.
JV Venture Pointe Decelopment LLC	Spotsylvania Crossing DE LLC
Kaden T, LLC	SR Clarksville TN LLC
Kimco of Pennsylvania Trust	SR Columbia SC LLC
Kimco Realty Corporation	SR Louisville KY LLC
KRG Castleton Crossing, LLC	SR Murfreesboro TN LLC
KRG Eastgate Pavilion LLC	SRL Crossings at Taylor LLC
KRG Town and Country Manchester LLC	SRL East Main Center LLC
Krinsky & Castelli Properties. LLC	SRLLC
Julian K. & Adrian C. et al	SSC Akron LLC
Lakeside Capital Advisors, LP Lakeview Plaza	SSC Burbank IL LLC
(Orland), LLC Lucky JJC, Inc.	SSC Calumet City IL LLC
Lynnhaven VC, LLC	SSC Charlotte NC LLC
Maple Ridge Plaza Acquisitions Marcy D.	SSC Market St Sandusky LLC
Cellentani	SSC Monroeville PA LLC
Market Square Owner, LLC	SSC Parkersburg WV LLC
Mishawaka Investments, LLC	SSC Pittsburgh PA LLC
MLRP Army Trail Trade Center, LLC Morse	SSC Springdale LLC
Road Company-I, LLC	SSC St. Peters MO LLC
MPI Development Group LLC	St Clairsville Main Parcel, L.L.C
NC Center Ft. Wayne, LLC	Sterling Ponds LLC
Niki Core I. LP.	Stoltz Real Estate Partners
Niki Delano. LP.	Store SPE AVFII 2017-2, LLC
NNN REIT, Inc.	SWTC Partners, LLC
PAARK Properties, LLC	TALCA Daytona Beach, LLC
Pacific Square, LLC	The Kroenke Group
Park Associates	The Real McKeever LLC
PR Financing Limited Partnership	THF Management, Inc.
RCC Chesapeake Center, LLC	THF Silver Spring Development, LP TNG Happy
Realty Four, LLP	Valley, LLC.
Robert L. Stark Enterprises, Inc.	Tropicaire Development, Inc.
Rosemont 2019, LLC	TRP-MCB Eastpoint, LLC
RPT Aspen Place, LP	Truss Greenwood IN LLC
Sandhill Columbia SC LLC	U.S. Transport Corporation
Saul Holdings Limited Partnership	United Properties Corp
SBV - Holland LLC	US Transport
SCF RC Funding IV LLC	Utica Park Place Owner, LLC
Schaumburg Associates LLC	Walden/Dick/ WR-1
Schostak Brothers & Company, Inc. Schottenstein	Weingarten Nostat, LLC
Property Group (SPG) Schottenstein Realty LLC	Weingarten Realty
SDG Dadeland Associates, Inc.	West Town Corners, LLC
SG-Mentor, LLC	Westview Center Associates L.C.

Woodbridge VA-JLP LLC

WRI Camp Creek Marketplace II, LP YSJ, LLC

Zamagias Properties

Schedule 2**Identified Connections**

Party	Connection Role
Berkeley Research Group, LLC	Professionals
Choate, Hall & Stewart LLP	Professionals
Fidelity	Equity Holder in Unrelated Closed Case
Kimco Realty Corporation	Former Committee Member in Unrelated Closed Cases
Morgan Stanley	Equity Holder in Unrelated Closed Case
NNN REIT, Inc.	Former Committee Member in Unrelated Cases
Pachulski Stang Ziehl & Jones LLP	Professionals
Prudential	Adverse Party in Unrelated Case
Raymond James	Professionals
SSG Advisors, LLC	Professionals
U.S. Transport Corporation	Former Committee Member in Unrelated Closed Case
Wells Fargo	Adverse Party in Unrelated Closed Case
West Town Corners, LLC	Former Debtor in Unrelated Close Case