IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

| Debtors. |) (Jointly Administered) |
|-------------------------------------|---------------------------|
| AMERICAN SIGNATURE, INC., et al., 1 |) Case No. 25-12105 (JKS) |
| In re: |) Chapter 11 |
| | |

CERTIFICATION OF NO OBJECTION REGARDING DEBTORS' MOTION FOR THE ENTRY OF AN ORDER AUTHORIZING REJECTION OF EXECUTORY CONTRACT WITH MAN WAH (HONG KONG) TRADING COMPANY LIMITED

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received to the *Debtors' Motion for the Entry of an Order Authorizing Rejection of Executory Contract with Man Wah (Hong Kong) Trading Company Limited* (the "Motion") [Docket No. 17] filed on November 24, 2025. The undersigned further certifies that the Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Debtors' Motion for the Entry of an Order Authorizing Rejection of Executory Contract with Man Wah (Hong Kong) Trading Company Limited* [Docket No. 98] filed on November 26, 2025, objections to the Motion were to be filed and served no later than December 11, 2025 at 4:00 p.m. prevailing Eastern Time.

Accordingly, it is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the Court's convenience.

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.



Dated: December 30, 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

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

| AMERICAN SIGNATURE, INC., et al., 1 | Case No. 25-12105 (JKS) |
|-------------------------------------|--|
| Debtors. | (Jointly Administered) Re: Docket No. 17 |

ORDER AUTHORIZING REJECTION OF EXECUTORY CONTRACT EFFECTIVE AS OF PETITION DATE

Upon consideration of the motion (the "Motion")² of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") for the entry of an order (this "Order") authorizing the Debtors to reject the Contract effective as of the Petition Date; and (ii) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this 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; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Debtors' notice of the Motion and opportunity for

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.

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

a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at any hearing before the Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED as set forth herein.
- 2. The Contract is rejected under section 365 of the Bankruptcy Code effective as of the Petition Date.
- 3. Within two (2) business days after entry of this Order, the Debtors will serve this Order on Man Wah.
- 4. Man Wah must file a proof of claim relating to the rejection of the Contract, if any, by the later of: (a) any applicable claims bar date established in these chapter 11 cases; or (b) 30 days after entry of this Order. The Debtors reserve all rights to contest any such claim.
- 5. The Debtors reserve their rights to assume, assign, or reject other executory contracts or unexpired leases, and nothing herein shall be deemed to affect such rights.
- 6. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any claim against a Debtor entity; (b) a waiver of the Debtors' right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order or the Motion; (e) a request or authorization to assume any agreement, contract, or lease pursuant to section 365 of the

Bankruptcy Code; or (f) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law.

- 7. Notwithstanding the possible applicability of Bankruptcy Rules 6004(g), 7062, or 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
- 9. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.