

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. 10, 76

**CERTIFICATION OF NO OBJECTION REGARDING
FINAL ORDER (I) AUTHORIZING, BUT NOT DIRECTING, THE PAYMENT OF
CERTAIN TAXES AND FEES; AND (II) GRANTING RELATED RELIEF**

The undersigned proposed counsel for the above-captioned debtors and debtors in possession (the “Debtors”) hereby certifies that:

1. On November 24, 2025, the Debtors filed the *Debtors’ Motion for Entry of Interim and Final Orders: (I) Authorizing, But Not Directing, the Payment of Certain Taxes and Fees; and (II) Granting Related Relief* [Docket No. 10] (the “Motion”).

2. On November 25, 2025 the Court entered the *Interim Order: (I) Authorizing, But Not Directing, the Payment of Certain Taxes and Fees; and (II) Granting Related Relief* [Docket No. 76] (the “Interim Order”) granting the relief requested in the Motion on an interim basis. Pursuant to the Interim Order, objections to entry of a final order granting the Motion were due no later than December 29, 2025.

3. No party filed an answer, objection, or other responsive pleading to the Motion on the Court’s docket.

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.



4. Attached hereto as **Exhibit A** is a proposed form of order approving the Motion on a final basis (the “**Proposed Final Order**”).

5. A blacklined copy of the Proposed Final Order is attached hereto as **Exhibit B**, showing changes from the Interim Order.

6. Accordingly, the Debtors request that the Proposed Final Order attached hereto as **Exhibit A** be entered at the Court’s earliest convenience.

Dated: December 30, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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Proposed Counsel to the Debtors and Debtors in Possession

Exhibit A

**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. 10 and 76

**FINAL ORDER: (I) AUTHORIZING, BUT NOT DIRECTING, THE PAYMENT OF
CERTAIN TAXES AND FEES; AND (II) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of a final order (this “Final Order”): (a) authorizing, but not directing, the Debtors to remit and pay (or use tax credits to offset) Taxes and Fees; and (b) granting related relief, all as more fully set forth in the Motion; and upon 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 that the Court 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 determined that the relief requested in the Motion is

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

necessary to the ongoing orderly operation of the Debtors' business and is in the best interest of the Debtors, their estates, and their creditors; and it appearing that the notice of the Motion having been given as set forth therein was appropriate and that no other or further notice need be given; and upon entry of an order [Docket No. 76] granting the requested relief on an interim basis and scheduling a final 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 after due deliberation and good and sufficient cause appearing therefor; IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on a final basis as set forth in this Final Order.
2. The Debtors are authorized, but not directed, on an final basis, to: (a) negotiate, pay, and remit (or use tax credits to offset), or otherwise satisfy, the Taxes and Fees that arose or accrued prior to the Petition Date and that will become due and owing in the ordinary course of business during the pendency of the chapter 11 cases at such time when the Taxes and Fees are payable; and (b) negotiate, pay, and remit (or use tax credits to offset) Taxes and Fees solely to the extent that they arise or accrue in the ordinary course of business on a postpetition basis.
3. The Debtors shall: (a) provide the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee with information regarding any and all Audits, as well as any disputes related thereto, commenced during the course of the chapter 11 cases; and (b) provide the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee with five (5) business days' notice prior to entering into settlements of claims for Taxes and Fees asserted in excess of \$200,000.00 which the Debtors believe they are authorized to compromise in the ordinary course of business, subject to the rights of those parties with respect to any such proposed compromises.

4. Within twenty (20) business days of the prior month's end, the Debtors shall deliver to the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee a report of (a) all payments made pursuant to this Final Order or the Final Order during the previous month on a category-by-category basis and (b) the total amount of payments made pursuant to this Final Order and the Final Order since the Petition Date on a category-by-category basis.

5. All applicable banks and other financial institutions are authorized to receive, process, honor, and pay any and all prepetition checks or by automated clearinghouse payment issued by the Debtors for the payment of Taxes and Fees approved herein, whether prior to or after commencement of the chapter 11 cases.

6. The Debtors are authorized, consistent with this Final Order, to issue postpetition checks or to effect postpetition automated clearinghouse requests in replacement of any checks or automated clearinghouse requests authorized to be paid pursuant to this Final Order relating to taxes that were dishonored or rejected.

7. Notwithstanding the relief granted herein or any actions taken hereunder, nothing contained in this Final Order shall create any rights in favor of, or enhance the status of any claim held by, any of the Authorities.

8. Nothing in the Motion, this Final Order, or the Debtors' payment of any claims pursuant to this Final Order, shall be construed as: (i) an admission as to the validity of any claim against any Debtor or the existence of any lien against the Debtors' properties; (ii) a waiver of the Debtors' or any other party in interest's rights to dispute any claim or lien on any grounds; (iii) a promise to pay any claim; (iv) an implication or admission that any particular claim would constitute an allowed claim; (v) an assumption or rejection of any executory contract or unexpired

lease pursuant to section 365 of the Bankruptcy Code; or (vi) a limitation on the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract with any party subject to this Final Order. Nothing contained herein or in the Motion shall be deemed to increase, decrease, reclassify, elevate to an administrative expense status, or otherwise affect any claim to the extent that it is not paid.

9. Nothing herein shall impair any right of the Debtors or any other party in interest to dispute or object to any taxes asserted as owing to the Taxing Authorities or those parties who ordinarily collect the Prepetition Tax Obligations as to amount, liability, classification, or otherwise.

10. Notwithstanding the possible applicability of Bankruptcy Rule 6004, the terms and conditions of this Final Order shall be immediately effective and enforceable. To the extent the 14-day stay of Bankruptcy Rule 6004(h) may be construed to apply to the subject matter of this Order, such stay is hereby waived.

11. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of Bankruptcy Rule 6004(a) and Local Rule 9013-1(m) are satisfied by such notice.

12. To the extent that the Debtors have overpaid any Taxes and Fees, the Debtors are authorized to seek a refund or credit.

13. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Final Order in accordance with the Motion.

14. This Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Final Order.

Exhibit B

**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.)	(Joint Administration Requested)
)	<u>(Jointly Administered)</u>
)	
		Re: Docket No<u>Nos.</u> 10 <u>and</u> 76

**INTERIMFINAL ORDER: (I) AUTHORIZING, BUT NOT DIRECTING, THE
PAYMENT OF
CERTAIN TAXES AND FEES; AND (II) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of ~~an interim~~ final order (this “InterimFinal Order”): (a) authorizing, but not directing, the Debtors to remit and pay (or use tax credits to offset) Taxes and Fees; and (b) granting related relief, all as more fully set forth in the Motion; and upon 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 that the Court 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

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.

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

this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that the relief requested in the Motion is necessary to the ongoing orderly operation of the Debtors' business and is in the best interest of the Debtors, their estates, and their creditors; and it appearing that the notice of the Motion having been given as set forth therein was appropriate and that no other or further notice need be given; and ~~the Court having reviewed the Motion and having heard the statements in support of~~ upon entry of an order [Docket No. 76] granting the relief requested therein at relief on an interim basis and scheduling a final 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 after due deliberation and good and sufficient cause appearing therefor; IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on ~~an interim~~ a final basis as set forth in this ~~Interim~~ Final Order.

~~2. The final hearing (the "Final Hearing") on the Motion shall be held on January 5, 2026, at 1:00 p.m., prevailing Eastern Time. Any objections or responses to entry of a final order on the Motion shall be filed on or before 4:00 p.m., prevailing Eastern Time, on December 29, 2025, and shall be served on: (a) proposed counsel to the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com); (b) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Malcolm M. Bates (malcolm.m.bates@usdoj.gov); (c) counsel to any statutory committee appointed in these chapter 11 cases; (d) counsel to the DIP Agent and Prepetition ABL Agent, Choate, Hall & Stewart LLP, Two International Place, Boston, MA 02110, Attn: John F. Ventola (jventola@choate.com);~~

~~Jonathan D. Marshall (jmarshall@choate.com), and Lucas B. Barrett, Esq. (lbarrett@choate.com), and Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801, Attn: Daniel J. DeFranceschi (defranceschi@RLF.com), John H. Knight (Knight@RLF.com) and Matthew P. Milana (Milana@RLF.com); and (c) counsel to the Prepetition Term Agent, Goldberg Kohn, 55 East Monroe Street, Chicago, IL 60603-5792, Attn: Randall L. Klein (randall.klein@goldbergkohn.com) and Zachary J. Garrett (zachary.garrett@goldbergkohn.com) and Blank Rome LLP, 1201 N. Market Street, Suite 800, Wilmington, DE 19801, Attn: Stanley B. Tarr (stanley.tarr@blankrome.com).~~

~~3. In the event no objections to entry of the Final Order on the Motion are timely received, this Court may enter such Final Order without need for the Final Hearing.~~

2. ~~4.~~ The Debtors are authorized, but not directed, on an ~~interim~~final basis, to: (a) negotiate, pay, and remit (or use tax credits to offset), or otherwise satisfy, the Taxes and Fees that arose or accrued prior to the Petition Date and that will become due and owing in the ordinary course of business during the pendency of the chapter 11 cases at such time when the Taxes and Fees are payable, ~~provided that such transfers shall not exceed \$3.05 million pending entry of the Final Order~~; and (b) negotiate, pay, and remit (or use tax credits to offset) Taxes and Fees solely to the extent that they arise or accrue in the ordinary course of business on a postpetition basis.

3. ~~5.~~ The Debtors shall: (a) provide the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee with information regarding any and all Audits, as well as any disputes related thereto, commenced during the course of the chapter 11 cases; and (b) provide the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee

with five (5) business days' notice prior to entering into settlements of claims for Taxes and Fees asserted in excess of \$200,000.00 which the Debtors believe they are authorized to compromise in the ordinary course of business, subject to the rights of those parties with respect to any such proposed compromises.

4. ~~6.~~ Within twenty (20) business days of the prior month's end, the Debtors shall deliver to the Prepetition ABL Agent, any statutory committee appointed in these chapter 11 cases, the DIP Agent and the U.S. Trustee a report of (a) all payments made pursuant to this ~~Interim~~Final Order or the Final Order during the previous month on a category-by-category basis and (b) the total amount of payments made pursuant to this ~~Interim~~Final Order and the Final Order since the Petition Date on a category-by-category basis.

5. ~~7.~~ All applicable banks and other financial institutions are authorized to receive, process, honor, and pay any and all prepetition checks or by automated clearinghouse payment issued by the Debtors for the payment of Taxes and Fees approved herein, whether prior to or after commencement of the chapter 11 cases.

6. ~~8.~~ The Debtors are authorized, consistent with this ~~Interim~~Final Order, to issue postpetition checks or to effect postpetition automated clearinghouse requests in replacement of any checks or automated clearinghouse requests authorized to be paid pursuant to this ~~Interim~~Final Order relating to taxes that were dishonored or rejected.

7. ~~9.~~ Notwithstanding the relief granted herein or any actions taken hereunder, nothing contained in this ~~Interim~~Final Order shall create any rights in favor of, or enhance the status of any claim held by, any of the Authorities.

8. ~~10.~~ Nothing in the Motion, this ~~Interim~~Final Order, or the Debtors' payment of any claims pursuant to this ~~Interim~~Final Order, shall be construed as: (i) an admission as to the

validity of any claim against any Debtor or the existence of any lien against the Debtors' properties; (ii) a waiver of the Debtors' or any other party in interest's rights to dispute any claim or lien on any grounds; (iii) a promise to pay any claim; (iv) an implication or admission that any particular claim would constitute an allowed claim; (v) an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code; or (vi) a limitation on the Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract with any party subject to this ~~Interim~~Final Order. Nothing contained herein or in the Motion shall be deemed to increase, decrease, reclassify, elevate to an administrative expense status, or otherwise affect any claim to the extent that it is not paid.

9. ~~11.~~ Nothing herein shall impair any right of the Debtors or any other party in interest to dispute or object to any taxes asserted as owing to the Taxing Authorities or those parties who ordinarily collect the Prepetition Tax Obligations as to amount, liability, classification, or otherwise.

10. ~~12.~~ Notwithstanding the possible applicability of Bankruptcy ~~Rules 6003 and~~Rule 6004, the terms and conditions of this ~~Interim~~Final Order shall be immediately effective and enforceable. ~~The requirements set forth in Bankruptcy Rule 6003(b) are satisfied by the Motion.~~ To the extent the 14-day stay of Bankruptcy Rule 6004(h) may be construed to apply to the subject matter of this Order, such stay is hereby waived.

11. ~~13.~~ Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of Bankruptcy Rule 6004(a) and Local Rule 9013-1(m) are satisfied by such notice.

12. ~~14.~~ To the extent that the Debtors have overpaid any Taxes and Fees, the Debtors are authorized to seek a refund or credit.

13. ~~15.~~ The Debtors are authorized to take all actions necessary to effectuate the relief granted in this ~~Interim~~Final Order in accordance with the Motion.

14. ~~16.~~ This Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this ~~Interim~~Final Order.

Document comparison by Workshare Compare on Tuesday, December 30, 2025
7:38:37 PM

Input:	
Document 1 ID	netdocuments://4938-2987-2762/7
Description	ASI - Taxes Motion
Document 2 ID	netdocuments://4938-2987-2762/8
Description	ASI - Taxes Motion
Rendering set	Standard

Legend:	
<u>Insertion</u>	
Deletion	
Moved from	
<u>Moved to</u>	
Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	40
Deletions	67
Moved from	0
Moved to	0
Style changes	0
Format changes	0
Total changes	107