

**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. 11, 77

**CERTIFICATION OF COUNSEL REGARDING
FINAL ORDER AUTHORIZING DEBTORS TO PAY PREPETITION CLAIMS
OF SHIPPERS AND CUSTOM REPRESENTATIVES**

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 Authorizing Debtors to Pay Prepetition Claims of Shippers and Custom Representatives* [Docket No. 11] (the “Motion”).

2. On November 25, 2025 the Court entered the *Interim Order Authorizing Debtors to Pay Prepetition Claims of Shippers and Customs Representatives* [Docket No. 77] (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.

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.

3. The Debtors received informal comments to the Motion from the Official Committee of Unsecured Creditors (the “Committee”). No party filed an answer, objection, or other responsive pleading to the Motion on the Court’s docket.

4. Attached hereto as **Exhibit A** is a proposed form of order approving the Motion on a final basis that incorporates the Committee’s comments (the “Proposed Final Order”). The Committee has no objection to the entry of 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)
)	Ref. Docket Nos. 10 and 77

**FINAL ORDER AUTHORIZING DEBTORS TO PAY PREPETITION CLAIMS OF
SHIPPERS AND CUSTOMS REPRESENTATIVES**

Upon 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”): (i) authorizing, but not directing, the Debtors to pay certain prepetition claims of Shippers and Customs Representatives; and (ii) authorizing financial institutions to receive, process, honor, and pay all checks issued and electronic payment requests made relating to the foregoing, and (iii) 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

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

found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and upon entry of an order [Docket No. 77] 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 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 on a final basis as set forth herein.
2. The Debtors are authorized to pay in the ordinary course of business prepetition Shipping and Custom Charges not to exceed, on a final basis, in the aggregate, \$13,000,000 unless otherwise ordered by the Court. The Debtors shall maintain a schedule of payments (the "Shipper and Customs Representative Payment Schedule") made pursuant to this Final Order and provide a copy of such Shipper and Customs Representative Payment Schedule to counsel for the Official Committee of Unsecured Creditors upon request; *provided however*, the Debtors shall provide the requested copies within five (5) business days.
3. The Debtors are authorized, but not directed, to (a) continue and maintain the Custom Bonds, and pay any related prepetition or postpetition amounts or obligations in the ordinary course of business and consistent with prepetition practice, and (b) renew, amend, supplement, or extend their existing Custom Bonds, or purchase additional custom bonds to the extent that the Debtors determine that such action is in the best interests of their estates.
4. All banks and other financial institutions on which checks were drawn or electronic payment requests made in payment of the prepetition Shipping and Custom Charges approved

herein are authorized to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment; provided, however, that sufficient funds are available in the Debtors' bank accounts to cover such payments; and provided, further, that all such banks and financial institutions are authorized to rely on the Debtors' designation of any particular check or electronic payment request as approved by this Final Order.

5. The Debtors are authorized to reissue any check, electronic payment, or otherwise, which was drawn in payment of any prepetition Shipping and Custom Charges authorized to be paid under this Final Order that are not cleared by a depository.

6. Nothing herein shall impair the Debtors' ability, in their sole discretion, or any other party in interest's ability to contest the validity and amounts of the Shipping and Custom Charges.

7. Nothing herein shall prejudice the Debtors' rights to request Court authority to make additional payments to the Shippers and Customs Representatives in the ordinary course of business.

8. Nothing contained in the Motion or this Final Order, nor any payment made pursuant to the authority granted by this Final Order, is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors; (ii) a waiver of the Debtors' or any appropriate party in interest's rights to dispute the amount of, basis for, or validity of any claim against the Debtors; (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder; or (iv) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy between the Debtors and any third party under section 365 of the Bankruptcy Code.

9. Notwithstanding the possible applicability of Bankruptcy Rule 6004(h), the terms and conditions of this Final Order shall be immediately effective and enforceable upon its entry.

10. 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 the Local Rules are satisfied by such notice.

11. The Debtors are hereby authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate the terms of this Final Order.

12. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and 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
)	(Jointly Administered)
		Ref. Docket No <u>Nos. 10 and 77</u>

**INTERIM~~FINAL~~ ORDER AUTHORIZING DEBTORS TO PAY PREPETITION
CLAIMS OF
SHIPPERS AND CUSTOMS REPRESENTATIVES**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of ~~an interim~~ a final order (this “~~Interim~~ Final Order”): (i) authorizing, but not directing, the Debtors to pay certain prepetition claims of Shippers and Customs Representatives; and (ii) authorizing financial institutions to receive, process, honor, and pay all checks issued and electronic payment requests made relating to the foregoing, and (iii) 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

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

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 relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors' notice of the Motion and opportunity for 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~~ upon entry of an order [Docket No. 77] 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 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 on ~~an interim~~ a final basis as set forth herein.

~~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@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, Esq.~~

~~(jventola@choate.com), Jonathan D. Marshall, Esq. (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 (e) 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).~~

2. ~~3.~~ The Debtors are authorized to pay in the ordinary course of business prepetition Shipping and Custom Charges not to exceed, on an ~~interim~~final basis, in the aggregate, ~~\$8,400,000~~13,000,000 unless otherwise ordered by the Court. The Debtors shall maintain a schedule of payments (the “Shipper and Customs Representative Payment Schedule”) made pursuant to this Final Order and provide a copy of such Shipper and Customs Representative Payment Schedule to counsel for the Official Committee of Unsecured Creditors upon request; provided however, the Debtors shall provide the requested copies within five (5) business days.

3. ~~4.~~ The Debtors are authorized, but not directed, to (a) continue and maintain the Custom Bonds, and pay any related prepetition or postpetition amounts or obligations in the ordinary course of business and consistent with prepetition practice, and (b) renew, amend, supplement, or extend their existing Custom Bonds, or purchase additional custom bonds to the extent that the Debtors determine that such action is in the best interests of their estates.

4. ~~5.~~ All banks and other financial institutions on which checks were drawn or electronic payment requests made in payment of the prepetition Shipping and Custom Charges

approved herein are authorized to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment; provided, however, that sufficient funds are available in the Debtors' bank accounts to cover such payments; and provided, further, that all such banks and financial institutions are authorized to rely on the Debtors' designation of any particular check or electronic payment request as approved by this ~~Interim~~Final Order.

5. ~~6.~~ The Debtors are authorized to reissue any check, electronic payment, or otherwise, which was drawn in payment of any prepetition Shipping and Custom Charges authorized to be paid under this ~~Interim~~Final Order that are not cleared by a depository.

6. ~~7.~~ Nothing herein shall impair the Debtors' ability, in their sole discretion, or any other party in interest's ability to contest the validity and amounts of the Shipping and Custom Charges.

7. ~~8.~~ Nothing herein shall prejudice the Debtors' rights to request Court authority to make additional payments to the Shippers and Customs Representatives in the ordinary course of business.

8. ~~9.~~ Nothing contained in the Motion or this ~~Interim~~Final Order, nor any payment made pursuant to the authority granted by this ~~Interim~~Final Order, is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors; (ii) a waiver of the Debtors' or any appropriate party in interest's rights to dispute the amount of, basis for, or validity of any claim against the Debtors; (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder; or (iv) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy between the Debtors and any third party under section 365 of the Bankruptcy Code.

~~10. Bankruptcy Rule 6003(b) has been satisfied because the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtors.~~

9. ~~11.~~ Notwithstanding the possible applicability of Bankruptcy Rule 6004(h), the terms and conditions of this ~~Interim~~Final Order shall be immediately effective and enforceable upon its entry.

10. ~~12.~~ 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 the Local Rules are satisfied by such notice.

11. ~~13.~~ The Debtors are hereby authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate the terms of this ~~Interim~~Final Order.

12. ~~14.~~ The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this ~~Interim~~Final Order.

Document comparison by Workshare Compare on Monday, December 29, 2025
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Input:	
Document 1 ID	netdocuments://4918-1087-3210/13
Description	ASI - Shippers Motion
Document 2 ID	netdocuments://4918-1087-3210/17
Description	ASI - Shippers Motion
Rendering set	Standard

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

Statistics:	
	Count
Insertions	33
Deletions	58
Moved from	0
Moved to	0
Style changes	0
Format changes	0
Total changes	91