

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)

Re: Docket No. 213

**SUPPLEMENTAL DECLARATION OF L. KATHERINE GOOD
OF POTTER ANDERSON & CORROON LLP IN SUPPORT OF
DEBTORS' APPLICATION FOR ENTRY OF AND ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF
POTTER ANDERSON & CORROON LLP AS SPECIAL COUNSEL
ON BEHALF OF AND AT THE SOLE DIRECTION OF THE
CONFLICTS COMMITTEE OF THE BOARD OF DIRECTORS OF
AMERICAN SIGNATURE, INC., EFFECTIVE AS OF THE PETITION DATE**

I, L. Katherine Good, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the firm of Potter Anderson & Corroon LLP ("Potter Anderson"), which maintains an office for the practice of law at 1313 N. Market Street, Wilmington, Delaware 19801. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Delaware and the United States District Court for the District of Delaware.

2. I make this supplemental declaration pursuant to section 327 of title 11 of the United States Code (the "Bankruptcy Code") and rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") in support of the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Potter Anderson & Corroon LLP as*

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.



Special Counsel on Behalf of and at the Sole Direction of the Conflicts Committee of the Board of Directors of American Signature, Inc., Effective as of the Petition Date [Docket No. 213] (the “Application”).²

3. Attached to the Application as Exhibit B was the *Declaration of L. Katherine Good of Potter Anderson & Corroon LLP in Support of Debtors’ Application for Entry of an Order Authorizing the Employment and Retention of Potter Anderson & Corroon LLP as Special Counsel on Behalf of and at the Sole Direction of the Conflicts Committee of the Board of Directors of American Signature, Inc., Effective as of the Petition Date* (the “Initial Good Declaration”).

4. Attached to the Initial Good Declaration as Exhibit 1 was a list of Potential Parties-in-Interest in these Chapter 11 Cases. Subsequent to the filing of the Initial Good Declaration, Potter Anderson became aware of certain additional parties in interest (the “Additional Parties-In-Interest”) of the Debtors that were inadvertently omitted from the Application and Initial Good Declaration. The Additional Parties-In-Interest list is attached hereto as Exhibit 1.

5. In accordance with the procedures described in the Application and Initial Good Declaration, Potter Anderson has reviewed the Additional Parties-In-Interest and searched its electronic database of representations for connections thereto. Potter Anderson has in the past represented, currently represents, and/or may in the future represent, in matters wholly unrelated to the Debtors or these Chapter 11 Cases, certain Additional Parties-In-Interest (including, without limitation, the entity set forth on Exhibit 2, attached hereto, which is a current client, and those entities or affiliates thereof set forth on Exhibit 3, attached hereto, who have been represented by Potter Anderson within the last five (5) years). I do not believe that any single matter is a major

² Capitalized terms not defined herein shall have the meanings given to them in the Application or the Initial Good Declaration (defined below), as applicable.

engagement that, alone or in the aggregate with other engagements for the same entity, involves the billing of fees in excess of one percent (1%) of Potter Anderson's annual fees billed.

6. As stated in the Initial Good Declaration, based on the conflicts searches conducted to date and described herein or in the Initial Good Declaration, I believe that Potter Anderson does not represent or hold any interests adverse to the Debtors or their estates with respect to the matters on which Potter Anderson has been retained.

7. To the extent any information disclosed herein requires amendment or modification as additional party-in-interest information becomes available to Potter Anderson, a further supplemental declaration will be submitted to this Court reflecting such amended or modified information.

8. The facts set forth in the Application, the Initial Good Declaration, and this supplemental declaration are true and correct to the best of my knowledge, information, and belief.

Date: December 31, 2025

/s/ L. Katherine Good

L. Katherine Good

Exhibit 1

List of Additional Parties-in-Interest

Current/Former Debtor Affiliates

LDS Holdings, LLC

Debtor Professionals

Kurtzman Carson Consultants LLC dba Verita Global

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
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.
Brixxmor Holdings 10 SPE, LLC
Brixxmor Operating Partnership 2, LLC
Brixxmor Property Group
Brixxmor/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
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.
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
JLP-Youngstown, LLC
Jubilee Coolsprings LLC
Jubilee Limited Partnership
Jubilee-Sawmill, LLC
JV Venture Pointe Decelopment LLC
Kaden T, LLC
Kimco of Pennsylvania Trust
Kimco Realty Corporation
KRG Castleton Crossing, LLC
KRG Eastgate Pavilion LLC
KRG Town and Country Manchester LLC
Krinsky & Castelli Properties. LLC Julian K. & Arian C. et al
Lakeside Capital Advisors, LP
Lakeview Plaza (Orland), LLC
LFN LIMITED
Lucky JJC, Inc.
Lynnhaven VC, LLC
Maple Ridge Plaza Acquisitions
Marcy D. Cellentani
Market Square Owner, LLC
MLRP Army Trail Trade Center, LLC
Morse Road Company-I, LLC
MPI Development Group LLC
NC Center Ft. Wayne, LLC

Niki Core I. LP.
Niki Delano. LP.
NNN REIT, Inc.
PAARK Properties, LLC
Pacific Square, LLC
Park Associates
PR Financing Limited Partnership
RCC Chesapeake Center, LLC
Realty Four, LLP
Robert L. Stark Enterprises, Inc.
Rosemont 2019, LLC
RPT Aspen Place, LP
Sandhill Columbia SC LLC
Saul Holdings Limited Partnership
SBV - Holland LLC
SCF RC Funding IV LLC
Schaumburg Associates LLC
Schostak Brothers & Company, Inc.
Schottenstein Property Group (SPG)
Schottenstein Realty LLC
SDG Dadeland Associates, Inc.
SG-Mentor, LLC
Sir Barton Place LLC
Skyline Seven Real Estate
Spark Realty Solutions, Inc.
SPG ASI Polaris LLC
Spirit Realty, L.P.
Spotsylvania Crossing DE LLC
SR Clarksville TN LLC
SR Columbia SC LLC
SR Louisville KY LLC
SR Murfreesboro TN LLC
SRL Crossings at Taylor LLC
SRL East Main Center LLC
SRLLC
SSC Akron LLC
SSC Burbank IL LLC
SSC Calumet City IL LLC
SSC Charlotte NC LLC
SSC Market St Sandusky LLC
SSC Monroeville PA LLC
SSC Parkersburg WV LLC
SSC Pittsburgh PA LLC
SSC Springdale LLC
SSC St. Peters MO LLC
St Clairsville Main Parcel, L.L.C
Sterling Ponds LLC
Stoltz Real Estate Partners
Store SPE AVFII 2017-2, LLC
SWTC Partners, LLC
TALCA Daytona Beach, LLC

The Kroenke Group
The Real McKeever LLC
THF Management, Inc.
THF Silver Spring Development, LP
TNG Happy Valley, LLC.
Tropicaire Development, Inc.
TRP-MCB Eastpoint, LLC
Truss Greenwood IN LLC
U.S. Transport Corporation
United Properties Corp
US Transport
Utica Park Place Owner, LLC
Walden/Dick/ WR-1
Weingarten Nostat, LLC
Weingarten Realty
West Town Corners, LLC
Westview Center Associates L.C.
Woodbridge VA-JLP LLC
WRI Camp Creek Marketplace II, LP
YSJ, LLC
Zamagias Properties

Lender Professionals

Richards, Layton & Finger P.A.

Shippers/Distribution Centers

Kyndryl Inc.

Top 30 Unsecured Creditor

Ashley Furniture Industries
CT Mattress Brother Co Ltd.
Dickson Furniture International
Everest Technologies Inc.
H317 Logistics LLC
Hackney Home Furnishings Inc.
Happy Furniture (Vietnam) Co Ltd.
Home Meridian Group LLC
Ideaitalia Contemporary
Intercon Inc
Kuka (HK) Trade Co Limited
Magnussen Home Furnishings Inc.
Man Wah MCO
Manhattan Associates Inc.
Mellow River Inc.
Najarian Furniture Co Inc.
Palmetto Home LLC
Riverside Furniture Corp.
Sealy Mattress Manufacturing

Sherwood Southeast LLC
Steve Silver Company
Targetcast LLC
Tempur-Pedic North America LLC
Vogue Home, LLC

Exhibit 2¹

Current Client(s)²

Richards, Layton & Finger P.A.

¹ Parties that are both current clients and former clients of Potter Anderson are listed only on Exhibit 2 – Current Clients.

² Due to the similarity of names and certain entities, Potter Anderson was not able to determine if all the entities listed herein are actually affiliates of certain clients. However, out of an abundance of caution, Potter Anderson has listed those entities which it reasonably believes to be affiliates of current clients.

Exhibit 3

Former Clients¹

Kimco Realty Corporation
St Clairsville Main Parcel, L.L.C.

¹ Due to the similarity of names and certain entities, Potter Anderson was not able to determine if all the entities listed herein are actually affiliates of certain clients. However, out of an abundance of caution, Potter Anderson has listed those entities which it reasonably believes to be affiliates of former clients.