# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	)
In re:	) Chapter 11
	)
AMERICAN SIGNATURE, INC., et al., 1	) Case No. 25-12105 (JKS)
	)
Debtors.	) (Joint Administration Requested)
	)

# **NOTICE OF HEARING ON FIRST DAY MOTIONS**

This proceeding will be hybrid in-person/Zoom. Delaware counsel are expected to appear in person and all other parties are permitted to appear remotely via Zoom. Please refer to Judge Stickles' Chambers Procedures (<a href="https://www.deb.uscourts.gov/judge-j-kate-stickles">https://www.deb.uscourts.gov/judge-j-kate-stickles</a>) and the Court's website (<a href="http://www.deb.uscourts.gov/ecourt-appearances">https://www.deb.uscourts.gov/ecourt-appearances</a>) for information on the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements. Registration is required one-hour prior to the first-day hearing unless otherwise noticed using the <a href="https://www.deb.uscourts.gov/ecourt-appearances">https://www.deb.uscourts.gov/ecourt-appearances</a>) for information on the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements. Registration is required one-hour prior to the first-day hearing unless otherwise noticed using the <a href="https://www.deb.uscourts.gov/ecourt-appearances">https://www.deb.uscourts.gov/ecourt-appearances</a>)

PLEASE TAKE NOTICE that on November 22, 2025 (as applicable, the "Petition Date"), the above-captioned debtors and debtors in possession (collectively, the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

<sup>&</sup>lt;sup>1</sup> 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.



PLEASE TAKE FURTHER NOTICE that together with their chapter 11 petitions, the Debtors also filed the following applications and motions set forth below (collectively, the "First Day Motions"). The Debtors intend to seek approval of certain of the First Day Motions at a hearing by Zoom video conference (the "First Day Hearing") before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware (the "Court"), located at 824 North Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware 19801, on November 25, 2025 at 3:15 p.m. (prevailing Eastern Time).

# **First Day Declaration**

1. Declaration of Rudolph Morando in Support of the Debtors' Chapter 11 Petitions and First Day Relief [Filed 11/23/2025, <u>Docket No. 5</u>]

## **Administrative Motions**

- 2. Motion of Debtors for Entry of an Order (I) Directing Joint Administration Chapter 11 Cases and (II) Granting Related Relief [Filed 11/22/2025, Docket No. 2]
- 3. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date [Filed 11/23/2025, <u>Docket No. 4</u>]
- 4. Motion of Debtors for Orders (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Creditors, and (B) Redact Commercially Sensitive or Personally Identifiable Information; (II) Approving the Notice of Commencement and Service Thereof; and (III) Granting Related Relief [Filed 11/24/2025, Docket No. 6]

#### **First Day Motions Pertaining to Operations**

- 5. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed 11/24/2025, Docket No. 7]
- 6. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Perform Intercompany Transactions, and (E) Granting Related Relief [Filed 11/24/2025, <u>Docket No. 8</u>]
- 7. Motion of Debtors for Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from

- Altering, Refusing, or Discontinuing Services, (III) Approving Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Filed 11/24/2025, Docket No. 9]
- 8. 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 [Filed 11/24/2025, Docket No. 10]
- 9. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to Pay Prepetition Claims of Shippers and Custom Representatives [Filed 11/24/2025, <u>Docket No. 11</u>]
- 10. Motion of Debtors For Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance and Surety Coverage, and Letters of Credit Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies, Surety Bonds, and Letters of Credit, (C) Continue to Pay Broker Fees, and (D) Honor and Renew Their Premium Financing Agreements, and (II) Granting Related Relief [Filed 11/24/2025, Docket No. 13]
- 11. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Honor, Maintain and Administer Customer Programs and Related Prepetition Business Practices, and (II) Granting Related Relief [Filed: 11/24/2025, Docket No. 15]

# **Motion for DIP Financing**

12. Motion of the Debtors for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105, 361, 362, 363, 364, 503, 506, 507, and 552, and Bankruptcy Rules 2002, 4001, 6003, 6004, and 9014 (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Superpriority Administrative Expense Status and (B) Adequate Protection to Prepetition Secured Creditors, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Filed 11/24/2025, Docket No. 14]

# Related Documents:

a. Declaration of J. Scott Victor in Support of Motion of the Debtors for Entry of Interim and Final Orders under Bankruptcy Code Sections 105, 361, 362, 363, 364, 503, 506, 507, and 552, and Bankruptcy Rules 2002, 4001, 6003, 6004, and 9014 (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Superpriority Administrative Expense Status and (B) Adequate Protection to Prepetition Secured Creditors, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Filed: 11/24/2025, Docket No. 16]

## **Consulting Agreement Motion**

13. Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Assume the Consulting Agreement, (B) Conduct Store Closing Sales, With Such Sales to

Be Free and Clear of All Liens, Claims, and Encumbrances, and (C) Granting Related Relief [Filed: 11/24/2025, Docket No. 18]

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions may be obtained for a fee through the Court's website at <a href="https://www.deb.uscourts.gov">https://www.deb.uscourts.gov</a>, referencing Case No. 25-12105 (JKS), or for free by accessing the website maintained by the Debtors' proposed claims and noticing agent at <a href="https://veritaglobal.net/americansignature">https://veritaglobal.net/americansignature</a>.

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: November 24, 2025 PACHULSKI STANG ZIEHL & JONES LLP

## /s/ Laura Davis Jones

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Proposed Counsel to the Debtors and Debtors in Possession