**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. | ) | (Jointly Administered) |
| | ) | |
| DENISE SILOAC, | ) | |
| | ) | **Related Docket No. 1026** |
| Movant, | ) | |
| | ) | |
| v. | ) | |
| | ) | |
| AMERICAN SIGNATURE, INC., | ) | |
| | ) | |
| Respondent. | ) | |

**CERTIFICATION OF COUNSEL WITH RESPECT TO THE MOTION OF DENISE SILOAC FOR RELIEF FROM THE AUTOMATIC STAY**

The undersigned, counsel for Denise Siloac (the "Movant"), hereby certifies as follows:

1. On August 25, 2026, the Movant filed her *Motion of Denise Siloac for Relief from Automatic Stay* (the "Motion") [DI 1026]. Pursuant to the Notice of Motion, the deadline to object or respond to the Motion was September 3, 2026. No written objections or responses to the Motion have been filed with the Court or received by the Movant.

2. Counsel for the Debtor submitted informal comments to the proposed order attached to the Motion to counsel for the Movant. The undersigned certifies that the proposed

[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.

order attached hereto as **Exhibit A** (the "Proposed Order") resolves the concerns raised by the Debtor.

3. A redlined version of the Proposed Order showing changes from the Order filed with the Motion is attached hereto as **Exhibit B**.

WHEREFORE, the movant respectfully requests that this Honorable Court enter the Proposed Order attached hereto as Exhibit A.

Date: September 8, 2026
Wilmington, DE

**SULLIVAN NIMEROFF BROWN HILL LLC**

*/s/ E.E. Allinson III*

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*Attorneys for Denise Siloac*

# EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT**
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| Debtors. | ) | (Jointly Administered) |
| | ) | |
| | ) | **Related Docket No. 1026** |

**ORDER GRANTING MOTION OF DENISE SILOAC FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, this ____ day of September 2026, this matter coming before the Court on the *Motion of Denise Siloac for Relief from Automatic Stay* ("Motion")[2] pursuant to 11 U.S.C. § 362 (d); the Court having reviewed the Motion, any objections or responses to the Motion and all related pleadings; and the Court having determined that notice of the Motion was sufficient under the circumstances; and that the legal and factual bases set forth in the Motion establish sufficient cause for the relief granted herein; accordingly,

**IT IS HEREBY ORDERED** as follows:

1. The Motion is granted as set forth herein.

2. The automatic stay imposed by 11 U.S.C. § 362 (a) in the above-referenced Chapter 11 bankruptcy proceeding is lifted so as to allow Movant to (i) to allow the State Court Action to proceed to final resolution, (ii) to permit Movant to take any actions required to move the State Court Action to final resolution, and (iii) to permit Movant to collect on any judgment rendered

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[2] All capitalized terms in the Order shall have the same meaning ascribed to them in the Motion unless otherwise defined.

(or settlement reached) in her favor from the proceeds of the Insurance Policy and/or any other applicable insurance owned by the Debtors.

3. Movant hereby waives and disclaims any right to payment from the Debtors' bankruptcy estates on account of any claims asserted in the State Court Action and/or any proof of claim filed in the Debtors' bankruptcy cases. Any proof of claim filed by Movant arising from the State Court Action shall be deemed withdrawn and expunged with prejudice without the need for any further action on the part of the Debtors, their estates, or any other estate representative, and the claims agent in these chapter 11 cases is authorized to reflect such withdrawal in the claims register maintained in these proceedings. For the avoidance of doubt, such waiver, disclaimer, withdrawal, and/or expungement shall be without prejudice to Movant's right to proceed nominally against the Debtors in the State Court Action to the extent necessary or appropriate to preserve access to applicable insurance coverage owned by the Debtors, if any.

4. The 14-day stay imposed by Fed. R. Bankr. P. 4001(a)(4) is hereby waived. This Order shall become effective immediately upon its entry.

5. This Court shall retain jurisdiction over all matters related to this Order and/or the implementation thereof.

# EXHIBIT B

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

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| In re: | ) | Chapter 11 |
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| AMERICAN SIGNATURE, INC., *et al.*,[1] | ) | Case No. 25-12105 (JKS) |
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**ORDER GRANTING MOTION OF DENISE SILOAC FOR RELIEF FROM AUTOMATIC STAY**

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**IT IS HEREBY ORDERED** as follows:

1. The Motion is granted as set forth herein.

2. The automatic stay imposed by 11 U.S.C. § 362 (a) in the above-referenced Chapter 11 bankruptcy proceeding is lifted so as to allow Movant to (i) to allow the State Court Action to proceed to final resolution, (ii) to permit Movant to take any actions required to move the State Court Action to final resolution, and (iii) to permit Movant to collect on any judgment rendered

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(or settlement reached) in her favor from the proceeds of the Insurance Policy and/or any other applicable insurance ~~covered~~ owned by the Debtors.

3. Movant hereby waives and disclaims any right to payment from the Debtors' bankruptcy estates on account of any claims asserted in the State Court Action and/or any proof of claim filed in the Debtors' bankruptcy cases. Any proof of claim filed by Movant arising from the State Court Action shall be deemed withdrawn and expunged with prejudice without the need for any further action on the part of the Debtors, their estates, or any other estate representative, and the claims agent in these chapter 11 cases is authorized to reflect such withdrawal in the claims register maintained in these proceedings. For the avoidance of doubt, such waiver, disclaimer, withdrawal, and/or expungement shall be without prejudice to Movant's right to proceed nominally against the Debtors in the State Court Action to the extent necessary or appropriate to preserve access to applicable insurance coverage owned by the Debtors, if any.

4. The 14-day stay imposed by Fed. R. Bankr. P. 4001(a)(4) is hereby waived. This Order shall become effective immediately upon its entry.

45. This Court shall retain jurisdiction over all matters related to this Order and/or the implementation thereof.