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)

Objection Deadline: October 7, 2026 at 4:00 p.m. (ET)
Hearing Date: October 14, 2026 at 1:30 p.m. (ET)

MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) MODIFYING THE APPLICATION OF LOCAL RULE 3007-1 AND (II) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the "Debtors") state as follows in support of this motion (this "Motion"):

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Order"), (a) modifying the application of rule 3007-1(e) of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") to allow the Debtors to file up to four substantive omnibus claims objections per month, each containing up to one thousand claims, and (b) granting the related relief set forth herein.

Jurisdiction and Venue

2. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the United States Bankruptcy

[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.

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Court for the District of Delaware (the "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. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules, to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 105(a) and 502(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), rules 1001 and 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rules 1001-1 and 3007-1.

Background

5. On November 22, 2025 (the "Petition Date"), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On November 25, 2025, the Court entered an order [Docket No. 72] authorizing the procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. On December 4, 2025, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an official committee of unsecured creditors [Docket No. 119] (the "Committee"). No request for the appointment of a trustee or examiner has been made in these chapter 11 cases (the "Chapter 11 Cases").

6. The Debtors filed their statements of financial affairs and schedules of assets and liabilities (the "Schedules") with the Court on December 20, 2025. The statutory meeting of creditors under section 341 of the Bankruptcy Code was conducted on January 9, 2026.

7. On March 17, 2026, the Court entered an order setting the general claims bar date for April 30, 2026, the governmental bar date for May 21, 2026, and an administrative claims bar date for April 30, 2026 [Docket No. 617] (the "Bar Date Order").

8. In accordance with the Bar Date Order, the Debtors caused notice of the General Bar Date and proof of claim forms to be served on, among others, the Debtors' known creditors and other known parties in interest as of the Petition Date.

9. As of the filing date of this Motion, more than 15,000 proofs of claim have been filed in these Chapter 11 Cases. A detailed list of the filed claims is included in the official claims register maintained by the Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global ("Verita" or "Claims Agent"). Based upon the Debtors' preliminary review, approximately 11,000 of the proofs of claim were filed by customers asserting that they provided a deposit to the Debtors prior to the Petition Date for the purchase of certain home furnishings from American Signature Furniture or Value City Furniture (the "Customer Deposit Claims").

10. The Debtors and their advisors have been working diligently to review the claims, including any supporting documentation filed therewith. Specifically, the Debtors have focused their review upon the Customer Deposit Claims in order to liquidate the value of potential priority unsecured claims that must be paid by the estates. Based on their review, the Debtors have determined that a meaningful portion of the Customer Deposit Claims are flawed because these claims assert (a) incorrect claim amounts, (b) claims that have been previously satisfied by refunds provided by credit card issuers, or (c) priority status for claims for entitled only to treatment as general unsecured claims. Implementation of objection procedures and waiver of certain of the Local Rules will assist the Debtors to complete the claim reconciliation process,

address disputed claims, make distributions to creditors in an efficient and cost-effective manner, and complete an orderly and expeditious winddown of their operations in a process that preserves the value of the estates.

Basis for Relief

11. Local Rule 3007-1(e) provides that each substantive omnibus objection to proofs of claim may contain no more than one hundred claims, and no more than three substantive omnibus objections may be filed each calendar month. Local Rule 3007-1(e). Bankruptcy Rule 1001 provides that the Bankruptcy Rules "shall be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every case and proceeding." Fed. R. Bankr. P. 1001. Local Rule 1001-1(d) provides that "[t]he Court may modify application of these Local Rules in any case or proceeding in the interest of justice." Local Rule 1001(d). Finally, Local Rule 3007-1(e)(iii) provides that "[t]he Court may grant leave from the requirements of subsections (e)(i) and (e)(ii) of this Local Rule upon a motion filed and heard before the objection is filed." Local Rule 3007-1(e)(iii).

12. The Debtors respectfully submit that the one hundred-claim and three-objections-per-month limitations imposed by Local Rule 3007-1(e)(i) and (ii) are unnecessarily restrictive in these cases because of (a) the overwhelming volume of similar claims asserted against the Debtors' estates; (b) the mandate Bankruptcy Rule 1001 imposes to proceed timely and efficiently, and (c) the best interests of all stakeholders in these proceedings in the face of a value-maximizing winddown. In response to the numerous claims, the Debtors and their professionals have assembled specialized teams to review and reconcile the various categories of claims. The Debtors intend to object to numerous claims filed in these cases in a series of omnibus objections seeking, *inter alia*, reduction, reclassification, and disallowance of such claims (the "Disputed Claims"). Given the extensive number of claims filed in these Chapter 11

Cases, strict compliance with Local Rule 3007-1(e) may result in the claims reconciliation process requiring a prohibitive amount of time to complete, delaying the Debtors' wind-down and efficient disposition of the estates, and unnecessarily burdening the Court's ability to administer the Debtors' Chapter 11 Cases. By allowing the Debtors to file up to four substantive omnibus claims objections per month, each containing up to one thousand claims, the Court will be relieved of the burden of waiting for undue periods of time to review substantially similar omnibus objections.

13. Relief from the one-hundred claim restriction imposed by Local Rule 3007-1(e)(i) is granted routinely in large chapter 11 cases in this District when modification streamlines the claims process. *See, e.g.*, *In re Yellow Corp.*, Case No. 23-11069 (GTG) (Bankr. D. Del. Nov. 8, 2023) (permitting the debtors to file omnibus objections containing up to 500 claims); *In re Samson Res. Corp.*, Case No. 15-11934 (BLS) (Bankr. D. Del. Feb. 28, 2017) (permitting the debtors to file omnibus objections containing up to 500 claims); *In re Energy Future Holdings Corp.*, Case No. 14-10979 (CSS) (Bankr. D. Del. Nov. 19, 2014) (permitting the debtors to file omnibus objections containing up to 500 claims); *In re Overseas Shipholding Group, Inc.*, Case No. 12-20000 (PJW) (Bankr. D. Del. May 29, 2013) (permitting the debtors to file omnibus objections containing up to 500 claims); *In re Orleans Homebuilders, Inc.*, Case No. 10-10684 (PJW) (Bankr. D. Del. Apr. 20, 2011) (permitting the debtors to file omnibus objections containing up to 400 claims).

14. Further, relief from the three-objections-per-month restriction imposed by Local Rule 3007-1(e)(ii) is granted routinely in large chapter 11 cases in this District. *See, e.g., In re Yellow Corp.*, Case No. 23-11069 (GTG) (Bankr. D. Del. Nov. 8, 2023) (permitting the debtors to file up to four substantive omnibus objections per calendar month); *In re GUE*

Liquidation Cos., Case No. 19-11240 (LSS) (Bankr. D. Del. Feb. 3, 2020) (permitting the debtors to file up to four substantive omnibus objections per calendar month); *In re Forever 21, Inc.*, Case No. 19-12122 (MFW) (Bankr. D. Del. Jan. 9, 2020) (permitting the debtors to file up to four substantive omnibus objections per calendar month); *In re PES Holdings, LLC*, Case. No. 19-11626 (LSS) (Bankr. D. Del. Dec. 9, 2019) (permitting the debtors to file up to four substantive omnibus objections per calendar month); *In re Samson Res. Corp.*, Case No. 15-11934 (BLS) (Bankr. D. Del. Feb. 28, 2017) (permitting the debtors to file more than two omnibus objections per calendar month); *In re Orleans Homebuilders, Inc.*, Case No. 10-10684 (PJW) (Bankr. D. Del. Apr. 20, 2011) (permitting the debtors to file up to five omnibus objections per calendar month).

15. Accordingly, the Debtors respectfully request that the Court modify Local Rule 3007-1(e) to permit the Debtors to submit up to four substantive omnibus claims objections per calendar month, each containing up to one thousand claims. The relief sought in this Motion will allow the claims resolution and winddown processes to conclude in a timely, efficient, and cost-effective manner by avoiding the expense and delay of preparing and filing hundreds of individualized objections based on the same or similar underlying grounds. The relief sought could ultimately take **months** off of the claims resolution and winddown processes, reducing administrative costs associated therewith, and allowing all stakeholders a greater recovery.

16. Based on these considerations, the Debtors respectfully request that the Court grant a modification of the requirements of Local Rule 3007-1 as described above.

Notice

17. The Debtors will provide notice of this motion to: (a) the U.S. Trustee; (b) the counsel to the Committee; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

18. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtors request entry of the Order, substantially in the form attached hereto as **Exhibit A** (a) granting the relief requested herein and (b) granting such other relief as the Court deems appropriate under the circumstances.

Dated: September 30, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
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Counsel for the Debtors and Debtors in Possession

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)

Objection Deadline: October 7, 2026 at 4:00 p.m. (ET)
Hearing Date: October 14, 2026 at 1:30 p.m. (ET)

NOTICE OF MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) MODIFYING THE APPLICATION OF LOCAL RULE 3007-1 AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on September 30, 2026, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), filed the *Motion of Debtors for Entry of an Order (I) Modifying the Application of Local Rule 3007-1 and (II) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be filed with the Bankruptcy Court on or before **October 7, 2026 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) counsel to the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones

[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.

(ljones@pszjlaw.com) and David M. Bertenthal (dbertenthal@pszjlaw.com); (ii) counsel to the Official Committee of Unsecured Creditors, (a) Kelley Drye & Warren LLP, 3 World Trade Center, 175 Greenwich Street, New York, NY 10007, Attn: Jason Adams (jadams@kelleydrye.com), and (b) Cole Schotz P.C., 500 Delaware Avenue, Suite 200, Wilmington, DE 19801, Attn: Justin Alberto (jalberto@coleschotz.com);(iii) counsel to the DIP Agent and Prepetition ABL Agent, (a) 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 (lbarrett@choate.com), and (b) 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); (iv) counsel to the Prepetition Term Loan Agent, (a) 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 (b) Blank Rome LLP, 1201 North Market Street, Suite 800, Wilmington, DE 19801, Attn: Stanley B. Tarr (stanley.tarr@blankrome.com); and (v) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Malcolm M. Bates (malcolm.m.bates@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT IF AN OBJECTION OR RESPONSE IS RECEIVED, A HEARING WILL BE HELD ON **OCTOBER 14, 2026 AT 1:30 P.M. (PREVAILING EASTERN TIME)** BEFORE THE HONORABLE J. KATE STICKLES,

UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, FIFTH FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.

Dated: September 30, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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Counsel to the Debtors and Debtors in Possession

Exhibit A

Proposed Order

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)

ORDER (I) MODIFYING THE REQUIREMENTS OF LOCAL RULE 3007-1 AND (II) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors"), pursuant to Rule 1001 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 1001-1(c) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), for entry of an order (this Order"), (a) modifying the requirements of Local Rule 3007-1(e), and (b) granting related relief**,** as more fully set forth in the Motion; 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 this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to

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

28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this 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 this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

1. The Motion is granted to the extent set forth herein.

2. The requirements of Local Rule 3007-1(e) are hereby modified, and the Debtors are permitted to file up to four substantive omnibus claims objections per calendar month, with each containing up to one thousand claims.

3. Nothing in this Order shall prejudice the Debtors' rights to seek further modifications or waivers of the Local Rules or otherwise from this Court.

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

5. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.