Docket #1075 Date Filed: 10/05/2026

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)
	(Jointly Administered)
Debtors.	

CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING STIPULATION REGARDING CONTESTED MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE BY WORLDPAY LLC AND CONTINUANCE OF HEARING

The undersigned hereby certifies the following:

1. On November 22, 2025, (the "Petition Date"), American Signature, Inc. ("ASI") and its affiliates (collectively, the "Debtors") filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. On November 25, 2025, the Court entered an order authorizing the procedural consolidation and joint administration of ASI's chapter 11 case with those of its affiliates pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

2. After the Petition Date, pursuant to orders of the Court, including without limitation Docket Nos. 104, 259, 352, and 520, liquidation sales of the Debtors' merchandise were conducted at certain retail locations.

3. On March 17, 2026, the Court entered the *Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9) of the Bankruptcy Code; (II) Setting a Bar Date for the Filing of Proofs of Claim By Governmental Units;*

[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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(III) Setting a Bar Date for the Filing of Requests for Allowance of Administrative Expense Claims; (IV) Establishing an Amended Schedules Bar Date and a Rejection Damages Bar Date; (V) Approving the Form of and Manner for Filing Proofs of Claim; (VI) Approving a Notice of Bar Dates; and (VII) Granting Related Relief [Docket No. 617] (the "Bar Date Order"). Pursuant to paragraph 4 of the Bar Date Order, all parties asserting a request for payment of administrative expenses arising or deemed to have arisen on or prior to March 31, 2026, excluding claims for professional fees or priority claims under Bankruptcy Code section 503(b)(9), were required to file such administrative claim, including a notice of hearing, on or before April 30, 2026.

4. Worldpay, LLC f/k/a Vantiv, LLC ("Worldpay") processes certain credit card transactions between ASI and its customers. On April 29, 2026, Worldpay filed proof of claim number 11565 for administrative expenses in the amount of $110,477.91 for alleged losses due to customer chargebacks on post-petition transactions.

5. On July 9, 2026, Worldpay filed a *Motion for Allowance and Payment of Administrative Expense Claim* [Docket No. 931] (the "Motion"), asserting an administrative expense claim in the amount of $968,002.63 (the "Administrative Claim"), inclusive of amounts previously asserted in its proof of claim, based on customer chargebacks that occurred after the Petition Date. Worldpay has advised that the Administrative Claim is subject to voluntary reduction for certain pre-Petition Date charges therein.

6. The Debtors, SB360 Capital Partners LLC ("SB360"), and ASI Purchaser, LLC ("Purchaser" and collectively with the Debtors, SB360, and Worldpay, the "Parties") dispute the Administrative Claim, and the Parties wish to engage in discovery before the Debtors, SB360, and Purchaser file objections to the Motion.

7. The Parties have conferred regarding the nature of the Administrative Claim and potential written discovery, third party subpoenas, and depositions.

8. The Motion is presently set for a hearing on November 10, 2026 at 11:00 a.m. (prevailing Eastern Time) (the "Hearing Date"), with objections due on or before October 20, 2026 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").

9. The Parties have entered into a stipulation (the "Stipulation") with respect to the foregoing.

10. A proposed form of order approving the Stipulation (the "Proposed Order") is attached hereto as **Exhibit A**. The Stipulation is attached to the Proposed Order as Exhibit 1.

11. Accordingly, the Debtors respectfully request entry of the Proposed Order at the Court's earliest convenience.

Dated: October 5, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
David M. Bertenthal (CA Bar No. 167624)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
dbertenthal@pszjlaw.com

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)
	(Jointly Administered)
Debtors.	

Status Conference: November 10, 2026 at 11:00 a.m. (ET)

ORDER APPROVING STIPULATION REGARDING CONTESTED MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE BY WORLDPAY LLC AND CONTINUANCE OF HEARING

Upon consideration of the stipulation between American Signature, Inc. and its affiliates (collectively, the "Debtors"), SB360 Capital Partners LLC ("SB360"), ASI Purchaser, LLC ("Purchaser") and Worldpay, LLC f/k/a Vantiv, LLC ("Worldpay") (collectively, the "Parties"), attached hereto as **Exhibit 1** (the "Stipulation"), it is hereby

ORDERED that the Stipulation is approved and its terms and conditions are incorporated herein by reference, as if fully set forth in this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of the Stipulation.

[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.

Exhibit 1

Stipulation

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)
	(Jointly Administered)
Debtors.	

Status Conference: November 10, 2026 at 11:00 a.m. (ET)

STIPULATION REGARDING CONTESTED MOTION FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE BY WORLDPAY LLC AND CONTINUANCE OF HEARING

American Signature, Inc. ("ASI") and its affiliates (collectively, the "Debtors"), SB360 Capital Partners LLC ("SB360"), ASI Purchaser, LLC ("Purchaser") and Worldpay, LLC f/k/a Vantiv, LLC ("Worldpay") (collectively, the "Parties"), by and through their counsel, stipulate as follows:

WHEREAS, on November 22, 2025 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. On November 25, 2025, the Court entered an order authorizing the procedural consolidation and joint administration of ASI's chapter 11 case with those of its affiliates pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

[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.

WHEREAS, after the Petition Date, pursuant to orders of the Court, including without limitation Docket Nos. 104, 259, 352, and 520, liquidation sales of the Debtors' merchandise were conducted at certain retail locations.

WHEREAS, on March 17, 2026, the Court entered an *Order (I) Setting Bar Dates for Filing Proofs of Claim, Etc.* [Docket No. 617] ("Bar Date Order"). Pursuant to paragraph 4 of the Bar Date Order, all parties asserting a request for payment of administrative expenses arising or deemed to have arisen on or prior to March 31, 2026, excluding claims for professional fees or priority under Bankruptcy Code section 503(b)(9), were required to file such administrative claim, including a notice of hearing, on or before April 30, 2026.

WHEREAS, Worldpay processes certain credit card transactions between ASI and its customers.

WHEREAS, on April 29, 2026, Worldpay filed proof of claim number 11565 for administrative expenses in the amount of $110,477.91 for alleged losses due to customer chargebacks on post-petition transactions.

WHEREAS, on July 9, 2026, Worldpay filed a *Motion for Allowance and Payment of Administrative Expense Claim* [Docket No. 931] ("Motion") asserting an administrative claim in the amount of $968,002.63 (the "Administrative Claim"), inclusive of amounts previously asserted in its proof of claim, based on customer chargebacks that occurred after the Petition Date. Worldpay has advised that the Administrative Claim is subject to voluntary reduction for certain pre-Petition Date charges therein.

WHEREAS, the Debtors, SB360, and Purchaser dispute the Administrative Claim and the Parties wish to engage in discovery before the Debtors, SB360, and Purchaser file objections to the Motion.

WHEREAS, the Parties have conferred regarding the nature of the Administrative Claim and potential written discovery, third party subpoenas, and depositions.

WHEREAS, the Motion is presently set for a hearing on November 10, 2026 at 11:00 a.m. Eastern (the "Hearing Date"), with objections due on or before October 20, 2026 at 4:00 p.m. Eastern (the "Objection Deadline").

NOW THEREFORE, the Parties hereby agree as follows:

1. The Motion is a contested matter pursuant to Fed. Rule of Bankr. P. 9014.

2. The Parties are entitled to pursue discovery regarding the Administrative Claim in accordance with the Federal Rules of Bankruptcy Procedure applicable to contested matters.

3. The Hearing Date shall be converted to a status conference and the Objection Deadline shall be taken off calendar. The Parties agree to confer in good faith regarding the scope and timing of discovery and the nature and timing of the contested hearing before submitting a further scheduling stipulation and proposed order to the Court regarding a new Hearing Date and new Objection Deadline.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Stipulation.

Dated: October 5, 2026

MORRIS JAMES LLP

/s/ Carl N. Kunz

Carl N. Kunz, III (DE Bar No. 3201)
3205 Avenue North Blvd., Suite 100
Wilmington, Delaware 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
Email: ckunz@morrisjames.com

-and-

ARNALL GOLDEN GREGORY LLP
Frank N. White, Esq. (Admitted Pro Hac Vice)
171 17th Street NW, Suite 2100
Atlanta, GA 30363
Telephone: (404) 873-8744
Facsimile: (404) 873-8745
Email: frank.white@agg.com

Counsel for Worldpay, LLC f/k/a Vantiv LLC

Dated: October 5, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
David M. Bertenthal (CA Bar No. 167624)
Gail S. Greenwood (CA Bar No. 169939)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
dbertenthal@pszjlaw.com
ggreenwood@pszjlaw.com

Counsel for the Debtors and Debtors in Possession

Dated: October 5, 2026

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Luke Brzozowski

Luke Brzozowski (DE No. 7377)
1201 North Market Street, 16th Floor
Wilmington, DE 19801
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: lbrzozowski@morrisnichols.com

-and-

WACHTELL, LIPTON, ROSEN & KATZ
Neil M. Snyder
Angela K. Herring
51 West 52nd Street
New York, New York 10019
Telephone: (212) 403-1000
Facsimile: (212) 403-2000
Email: nmsnyder@wlrk.com
akherring@wlrk.com

Counsel for SB360 Capital Partners LLC and ASI Purchaser, LLC