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)

Hearing Date: November 10, 2026 at 11:00 a.m. (ET)
Objection Deadline: November 2, 2026 at 4:00 p.m. (ET)

DEBTORS' MOTION FOR FURTHER EXTENSION OF EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN

The above-captioned debtors and debtors in possession (collectively, the "Debtors") state as follows in support of this motion (the "Motion"):[2]

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Order"), pursuant to section 1121(d) of title 11 of the United States Code (the "Bankruptcy Code"): (i) further extending by 90 days the period during which the Debtors have the exclusive right to file a plan (the "Exclusive Filing Period") through and including **January 17, 2027**; and (ii) further extending by 90 days the period during which the Debtors have the exclusive right to solicit acceptances thereof (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods") through and including **March 17, 2027**.

[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.

[2] A detailed description of the Debtors and their business, including the facts and circumstances giving rise to the Debtors' chapter 11 cases, is set forth in the *Declaration of Rudolph Morando in Support of the Debtors' Chapter 11 Petitions and First Day Relief* (the "First Day Declaration") [Docket No. 5]. Capitalized terms used but not otherwise defined in this Motion have the meanings ascribed to them in the First Day Declaration.

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Absent the relief requested herein, the Exclusive Filing Period would expire on October 19, 2026, and the Exclusive Solicitation Period would expire on December 17, 2026.[3] The Debtors further request that the order be without prejudice to their right to seek additional extensions of the Exclusive Periods for cause in accordance with section 1121(d) of the Bankruptcy Code.

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 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. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (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 in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory predicates for the relief sought herein are sections 105(a) and 1121(d) of the Bankruptcy Code.

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

[3] *See Order Further Extending Exclusive Periods to File and Solicit Plan* [Docket No. 976] (the "Second Exclusivity Order").

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.

6. On May 11, 2026, the Court entered an order [Docket No. 801] granting the Debtors' first request for an extension of the Exclusive Periods.

7. On July 30, 2026, the Court entered the Second Exclusivity Order, granting the Debtors' second request for an extension of the Exclusive Periods.

Basis for Relief

8. Section 1121 of the Bankruptcy Code provides for exclusive periods in which a chapter 11 debtor may formulate and propose a confirmable plan of reorganization or liquidation and to solicit acceptances thereof without the disruption that might be caused by the filing of competing plans by non-debtor parties. However, section 1121(d) allows the court to extend the debtor's exclusive periods for "cause." Specifically, section 1121(d) provides that:

> (1) Subject to paragraph (2), on request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.
>
> (2)(A) The 120-day period specified in paragraph (1) may not be extended beyond a date that is 18 months after the date of the order for relief under this chapter.

> (B) The 180-day period specified in paragraph (1) may not be extended beyond a date that is 20 months after the date of the order for relief under this chapter.

11 U.S.C. § 1121(d).

A. Section 1121(d) Authorizes the Court to Extend the Exclusive Periods for "Cause"

9. A bankruptcy court has the discretion to extend a debtor's exclusive periods based upon the facts and circumstances of a particular case. *See First Am. Bank of New York v. Sw. Gloves & Safety Equip., Inc.*, 64 B.R. 963, 965 (D. Del. 1986); *203 N. LaSalle St. P'ship v. Bank of Am., N.A.*, No. 99 C 7110, 1999 U.S. Dist. LEXIS 19425, at *12 (N.D. Ill. 1999); *In re Mid-State Raceway, Inc.*, 323 B.R. 63, 68 (Bankr. N.D.N.Y. 2005); *In re Reetz*, 61 B.R. 412, 414 (Bankr. W.D. Wis. 1986). Although the Bankruptcy Code does not define "cause" for purposes of an extension request under section 1121(d), courts have looked to the legislative history of section 1121(d) for guidance. *See In re Gibson & Cushman Dredging Corp.*, 101 B.R. 405, 409 (E.D.N.Y. 1989); *In re Amko Plastics, Inc.*, 197 B.R. 74, 77 (Bankr. S.D. Ohio 1996). Such legislative history indicates that Congress did not intend that the initial exclusive periods be set in stone. *See Amko Plastics*, 197 B.R. at 77 (finding that courts should have flexibility in dealing with extensions of exclusivity); *Gaines v. Perkins (In re Perkins)*, 71 B.R. 294, 297 (W.D. Tenn. 1987) ("The hallmark of . . . [section 1121(d)] is flexibility.").

10. Instead, Congress intended that the debtor's exclusive periods be of sufficient length to afford the debtor a full and fair opportunity to negotiate, formulate, and draft a confirmable chapter 11 plan without the disruptions that would occur with the filing of competing plans. *See In re Geriatrics Nursing Home, Inc.*, 187 B.R. 128, 133 (D.N.J. 1995) ("The opportunity to negotiate its plan unimpaired by competition . . . is meant to allow the debtor time to satisfy all creditors and win support for its restructuring scheme and thus ensure its survival as a business."). Indeed, Congress has recognized that, depending on the facts and circumstances of a particular

case, an exclusive period of only 120 days may not provide a debtor with adequate time in which to propose such plan:

> The court is given the power, though, to increase . . . the 120-day period depending on the circumstances of the case. [T]he bill allows the flexibility for individual cases that is not available today. For example, if an unusually large company were to seek reorganization under chapter 11, the Court would probably need to extend the time in order to allow the debtor to reach an agreement.

H.R. Rep. No. 95-595, 95th Cong. 1st Sess. 232 (1977) (footnotes omitted).

11. Courts within the Third Circuit and in other jurisdictions have held that the decision to extend the Exclusive Periods is left to the sound discretion of a bankruptcy court and should be based on the totality of circumstances in each case. *See, e.g.*, *First Am. Bank of N.Y. v. Sw. Gloves & Safety Equip., Inc.*, 64 B.R. 963, 965 (D. Del. 1986) ("Section 1121(d) provides the Bankruptcy Court with flexibility to either reduce or increase that period of exclusivity in its discretion."); *In re Geriatrics Nursing Home, Inc.*, 187 B.R. at 132 (noting that section 1121(d) "grants great latitude to the Bankruptcy Judge in deciding, on a case-specific basis, whether to modify the exclusivity period"); *In re Cent. Jersey Airport Servs., LLC*, 282 B.R. 176, 184 (Bankr. D.N.J. 2002) (noting that the granting or denial of a request to extend exclusivity is within the discretion of the bankruptcy court).

12. In determining whether cause exists for an extension of exclusivity, bankruptcy courts consider a variety of factors, including:

a) the size and complexity of the case;

b) the necessity of sufficient time to negotiate and prepare adequate information;

c) the existence of good faith progress toward reorganization;

d) whether the debtor is paying its debts as they come due;

e) whether the debtor has demonstrated reasonable prospects for filing a viable plan;

f) whether the debtor has made progress in negotiating with creditors;

g) the length of time the case has been pending;

h) whether the debtor is seeking the extension to pressure creditors; and

i) whether unresolved contingencies exist.

See, e.g., *In re Adelphia Commc'ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006); *Cont'l Cas. Co. v. Burns & Roe Enters., Inc.*, No. 05-2529 (KSH), 2005 U.S. Dist. LEXIS 26247, at *11–12 (D.N.J. 2005); *In re Cent. Jersey Airport Servs., LLC*, 282 B.R. 176, 184 (Bankr. D.N.J. 2002); *In re Dow Corning Corp.*, 208 B.R. 661, 664–65 (Bankr. E.D. Mich. 1997).

13. Not all of the above factors are necessary or relevant in determining whether to grant an extension of the exclusivity periods in a particular case. *See, e.g.*, *In re Express One Int'l, Inc.*, 194 B.R. 98, 100–01 (Bankr. E.D. Tex. 1996) (relying upon only four factors in determining whether cause exists to support an extension); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (finding that cause existed to extend exclusivity based on only three factors). As explained more fully below, the application of the above factors to the facts and circumstances of these chapter 11 cases demonstrates that good cause exists to extend the Debtors' Exclusive Periods pursuant to section 1121(d) of the Bankruptcy Code.

B. Cause Exists for an Extension of the Debtors' Exclusive Periods

14. Since the Petition Date, the Debtors have made steady progress towards achieving their chapter 11 goals of consummating a sale of their assets and effectuating an orderly wind-down of their businesses. Upon the filing of these Chapter 11 Cases, the Debtors immediately commenced a process to conduct store closing sales and terminate operations at certain under-performing retail locations. In parallel with these efforts, the Debtors obtained Court authority to

market and sell their remaining assets. After an efficient but thorough marketing process, on February 6, 2026, the Court entered an order approving the sale of substantially all of the Debtors' assets to ASI Purchaser LLC (the "Purchaser"). After closing of the sale, the Debtors supported the closing sales at the Debtors' remaining retail locations during a contractual designation rights period included in the final terms of the sale. All closing sales are now complete, the Debtors' retail and warehouse leases have been rejected, and both the sale to the Purchaser and the store closing sales have been fully consummated. Additionally, the Debtors have filed, and expect to continue to file, objections and notices of satisfaction to administrative and priority claims as part of their efforts to move these cases forward.

15. While the sale transactions are now complete, additional work remains before the Debtors will be in a position to propose and solicit a potential chapter 11 plan that will provide meaningful distributions to the Debtors' creditors and pave the path to a value-maximizing resolution to these chapter 11 cases. By way of example, the Debtors are in the midst of reviewing potential causes of action that may contribute value to the estates and diligently continuing their analysis of the likely value of the secured, administrative, and priority claims filed against the estates and preparing additional claim objections to liquidate the value of such claims. The resolution of the foregoing, in addition to many other matters related to the Debtors' orderly wind-down of their businesses, will bear on the terms of the chapter 11 plan and the value to be distributed thereunder.

16. Granting the requested relief will allow the Debtors to focus their attention on maximizing the value of remaining assets, addressing material parts of the claims pool, and making additional progress on their wind-down efforts to reduce the administrative burn of these

chapter 11 cases. Permitting any other party in interest to put forth a chapter 11 plan at this juncture of these chapter 11 cases would create an unnecessary distraction to these efforts.

17. Ample cause exists for the Court to grant an extension of the Exclusive Periods. The Debtors and their professionals have continued to make meaningful progress in these chapter 11 cases. Among other things, the Debtors have been engaged in the following activities:

- negotiating and obtaining entry of an order approving a settlement with credit card processor Synchrony Bank, which recovered $450,000 for the Debtors' estates [Docket No. 804];
- negotiating the private sale of the Debtors' IEEPA Tariff Refund Claims to Vectigal LLC and obtaining entry of an order approving the same, which provided immediate proceeds of $7,231,113.84 to the Debtors' estates [Docket No. 838];
- effectuating a successful sale and assumption and assignment of certain leases and obtaining entry of an order approving the same [Docket No. 854];
- marketing, negotiating with potential buyers, filing a motion seeking approval of the private sale of claims and causes of action against Google LLC and its affiliates for cash consideration of $5,757,165.65 [Docket No. 938], and obtaining entry of an order approving the sale [Docket No. 986];
- filing an adversary proceeding seeking recovery of estate funds from Uniters North America, LLC [Adv. Proc. No. 26-50321] and ultimately negotiating and obtaining entry of an order approving a settlement of these claims, which resulted in a recovery of $500,000 for the Debtors' estates [Docket No. 892];
- negotiating with the Debtors' former landlords to resolve outstanding postpetition lease obligations [Docket Nos. 813, 893] and negotiating with other landlords to resolve their asserted claims;
- negotiating agreed orders resolving certain lift-stay motions and agreements [Docket Nos. 814, 894] and negotiating with other lift-stay movants to resolve their motions;
- negotiating agreed orders to resolve numerous administrative claims [Docket Nos. 836, 876, 897, 902, 1025, 1080] and negotiating with other administrative claimants to attempt to resolve their claims;
- addressing a large volume of questions, concerns, and issues raised by former employees, vendors, utility companies, and other parties in interest;

- rejecting numerous onerous executory contracts and unexpired leases [Docket Nos. 869, 884];
- responding to diligence requests from the Committee and other key stakeholder groups;
- negotiating with The CIT Group/Commercial Services, Inc. regarding a remittance agreement and obtaining entry of an order approving the same [Docket No. 1069], which recovered $919,517.01 for the Debtors' estates;
- preparing and filing a notice of administrative claims satisfied in full [Docket No. 1031];
- preparing and filing two omnibus claim objections [Docket Nos. 1032, 1033];
- reviewing and analyzing the proofs of claim filed in these cases, which number over 15,000, and obtaining entry of an order modifying the requirements of Local Rule 3007-1(e) to allow the Debtors to file up to four substantive omnibus claim objections per calendar month, with each such objection being permitted to contain up to 1000 claims;
- negotiating with Iron Mountain Information Management, LLC regarding their claims with respect to amounts to be paid in connection with destruction of certain of the Debtors' records, entering into a settlement agreement, and filing a motion to approve the settlement [Docket No. 1089]; and
- continuing to work with the Committee to address administrative expense claims and priority claims in an effort to forge a path toward confirmation of a chapter 11 plan.

18. Given the complexities of these chapter 11 cases and the Debtors' ability to continue moving these cases forward, the administration of these cases would be seriously disrupted if another party were permitted to file a plan. An extension of the Exclusive Periods is in the best interests of the Debtors, their estates, and all stakeholders, as it will provide the Debtors with an opportunity to procure the best recovery for their creditors and support a successful conclusion to these chapter 11 cases.

19. The Debtors satisfy the various factors that courts rely on in connection with granting extensions of the Exclusive Periods as set forth in section 1121(d) of the Bankruptcy Code:

- *The Debtors Have Made Good-Faith Progress*. As described above, the Debtors have made significant progress in administering these chapter 11 cases. The Debtors commenced these cases with extremely limited liquidity and have moved expeditiously to conduct a comprehensive marketing process to maximize the value of their estates for the benefit of all stakeholders. The Debtors have managed their prepetition and postpetition liabilities in an efficient manner and, when prudent, have sought to settle their obligations without the additional cost of litigation.

- *The Debtors Are Paying Their Bills as They Come Due*. Since the Petition Date, the Debtors have paid their postpetition debts in the ordinary course or as otherwise provided by Court order.

- *Extending the Exclusive Periods Will Not Prejudice Creditors*. Among other activities, the Debtors are requesting an extension of the Exclusive Periods to focus on working with the Committee and other key stakeholders to negotiate and develop a consensual chapter 11 plan. Continued exclusivity will permit the Debtors to maintain flexibility so that a competing plan by another third party does not derail the parties' efforts towards a plan process. All stakeholders will benefit from such continued stability and predictability.

- *The Debtors Have Demonstrated Reasonable Prospects for Filing a Viable Plan*. The Debtors continue to evaluate the assets and liabilities of their estates. Subject to receipt of further proceeds to be received by the estates from excluded assets, and further refinement of the amount of their liabilities, the Debtors expect expeditiously to prepare and seek approval of a disclosure statement and chapter 11 plan.

- *The Debtors Are Not Pressuring Creditors By Requesting an Extension of the Exclusive Periods*. The requested relief is not being sought to pressure the Debtors' creditors, and the Debtors submit that no pressure would result from the requested extension of the Exclusive Periods.

- *The Chapter 11 Cases Are Still Relatively New*. The Debtors' request for an extension of the Exclusive Periods is the Debtors' third such request and comes less than a year after the Petition Date and approximately seven months after the conclusion of the store liquidation sales. The length of these cases is not unique among similar debtors seeking an exclusivity extension. The Debtors continue to work toward the goal of pursuing a confirmed plan.

20. Termination of the Exclusive Periods would adversely impact the substantial progress made by the Debtors in the chapter 11 cases to date. As described herein, the Debtors and their professionals have been working diligently to facilitate a successful conclusion to these chapter 11 cases. Accordingly, cause exists to extend the Exclusive Periods as requested herein.

Notice

21. The Debtors will provide notice of this Motion to the following parties, or their counsel if known: (a) the U.S. Trustee; (b) the Committee; and (c) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE, the Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other and further relief as the Court deems just and proper.

Dated: October 19, 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 19899-8705 (Courier 19801)
Telephone: 302-652-4100
Facsimile: 302-652-4400
Email: ljones@pszjlaw.com
dbertenthal@pszjlaw.com

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)

Hearing Date: November 10, 2026 at 11:00 a.m. (ET)
Objection Deadline: November 2, 2026 at 4:00 p.m. (ET)

NOTICE OF DEBTORS' MOTION FOR FURTHER EXTENSION OF EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the *Debtors' Motion for Further Extension of Exclusive Periods to File and Solicit a Plan* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any responses to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Third Floor, Wilmington, Delaware 19801, and served upon the undersigned, so as to be received on or **before 4:00 p.m. (prevailing Eastern Time) on November 2, 2026**.

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 19899-8705 (Courier 19801), Attn: Laura

[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.

Davis Jones (ljones@pszjlaw.com) and David M. Bertenthal (dbertenthal@pszjlaw.com); (ii) counsel to the Conflicts Committee, (a) Goodwin Procter LLP, 620 Eighth Avenue, New York, NY 10018, Attn: Kizzy L. Jarashow (kjarashow@goodwinlaw.com) and Stacy Dasaro (sdasaro@goodwinlaw.com), and (b) Potter Anderson & Corroon LLP, 1313 North Market Street, 6th Floor, Wilmington, DE 19801, Attn: L. Katherine Good (kgood@potteranderson.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); (v) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Malcolm M. Bates (malcolm.m.bates@usdoj.gov); and (vi) 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).

PLEASE TAKE FURTHER NOTICE THAT, IF AN OBJECTION IS PROPERLY FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, A HEARING

WILL BE HELD ON **NOVEMBER 10, 2026 AT 11:00 A.M. (PREVAILING EASTERN TIME)** BEFORE THE HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, FIFTH FLOOR, COURTROOM #6, WILMINGTON, DELAWARE 19801. ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.

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

Dated: October 19, 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 19899-8705 (Courier 19801)
Telephone: 302-652-4100
Facsimile: 302-652-4400
Email: ljones@pszjlaw.com
dbertenthal@pszjlaw.com

Counsel for 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)
	Ref. Docket No. ____

ORDER FURTHER EXTENDING
EXCLUSIVE PERIODS TO FILE AND SOLICIT A PLAN

Upon the motion (the "Motion")[2] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") extending by 90 days: (a) the Exclusive Filing Period, through and including January 17, 2027; and (b) the Exclusive Solicitation Period, through and including March 17, 2027, without prejudice to the Debtors' rights to seek further extensions, all 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 the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having

[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.

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

found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that notice of and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and the 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 the Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Exclusive Filing Period is hereby extended through and including **January 17, 2027**.

3. The Exclusive Solicitation Period is hereby extended through and including **March 17, 2027**.

4. The extension of the Exclusive Periods granted herein is without prejudice to the Debtors' right to seek further extensions.

5. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.