Docket #1127 Date Filed: 11/06/2026

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DISTRICT OF DELAWARE

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: **AMERICAN SIGNATURE, INC.,** Debtor.
Chapter 11 | Case No. **25-12105 (JKS)**
Ref. Docket No. **1005, 1093, and 1113**

PRO SE MOVANT MARLENE DALEY'S OMNIBUS OBJECTION AND RESPONSE TO DEBTORS' SCHEDULING SUPPLEMENT (DOCKET NO. 1113) REGARDING PRODUCTION OF INSURANCE ASSETS

Marlene Daley, appearing pro se as a Movant and Creditor/Claimant, respectfully submits this Objection and Response to the Debtors' Supplemental Response / Scheduling Proposal (Docket No. 1113). In support thereof, Movant states as follows:

I. PRELIMINARY STATEMENT

1. As anticipated, the Debtors are attempting to delay the production of the Debtors' insurance assets following the October 14, 2026 hearing by filing a Supplemental Response on October 28, 2026 (Docket No. 1113), which seeks to kick a decision down the road to a proposed November 10, 2026 hearing.
2. Movant notes that the underlying request for these documents was first made in writing on August 10, 2026, well over 75 days ago.
3. Furthermore, as established in Movant's Notice of Filing Exhibit A (Docket No. 1093), Debtors' lead counsel Tim Cairns promised unconditionally in writing on September 14, 2026: *"Marlene, FYI, we expect to be able to provide you with the insurance policies you requested this week."*
4. Despite this unconditional promise, Debtors have continuously delayed, seeking to burden a non-tech-friendly pro se litigant with procedural red tape. Any scheduling proposal by the Debtors—including the delayed framework outlined in Docket No. 1113—that extends production beyond immediate delivery is a bad-faith attempt to stall these proceedings and escape clear disclosure rules.

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II. RELEVANCE OF ALL TOWERS OF INSURANCE TO MOVANT'S CLAIMS

1. Debtors have previously argued that discovery is irrelevant or burdensome. Movant reminds the Court that the underlying litigation involves severe corporate misconduct, including: Wrongful Termination, Pretextual Termination, Defamation, Hearsay, Republication, Breach of Company Policy, Spoliation of Evidence, Retaliation, and catastrophic personal injuries including Psychological Trauma, Emotional Distress, and Debilitation.
2. To properly evaluate and protect her claims, Movant has an ironclad right to view ALL Towers of Insurance, including both the Primary and all Excess layers of the Employment Practices Liability Insurance (EPLI) and Directors and Officers (D&O) policies.
3. These policies, which are held by third-party insurers, sit entirely outside the bankruptcy estate, and their disclosure places zero financial or administrative burden on the Debtors' estate.

III. OBJECTION TO UNREASONABLE TIMELINES AND CONDITIONAL DISCLOSURE

1. Movant objects to any proposed timeline that extends production past three (3) business days from the date of this Court's order. The requested policies are static, existing corporate documents, readily available from the Debtors' insurance brokers.

2. Movant further objects to any attempt by Debtors to rewrite discovery rules by demanding restrictive, customized confidentiality agreements meant to obstruct Movant's review. As Movant stated on the record during the October 14 hearing, confidentiality concerns have already been fully and proactively addressed in Movant's Proposed Order. Movant remains willing to sign a standard, reasonable confidentiality acknowledgment, but will not allow counsel to use "confidentiality" to usurp the law or conceal available coverage limits.

IV. CONCLUSION & PRAYER FOR RELIEF

WHEREFORE, Movant Marlene Daley respectfully requests that this Honorable Court reject any extended timeline proposed by the Debtors in Docket No. 1113, hold Debtors' counsel to his written promise of September 14, 2026, and enter an Order compelling the Debtors to produce all declaration pages, policy forms, and schedules for all layers and towers of the EPLI and D&O insurance policies within three (3) business days.

Dated: October 28, 2026

Respectfully submitted,

/s/ Marlene Daley
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