#### IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA NEWNAN DIVISION

In re:

Chapter 11

Case No. 25-10356 (PMB)

Debtors.

AFH AIR PROS, LLC, et al.,<sup>1</sup>

(Jointly Administered)

**Related to Docket No. 433** 

## NOTICE OF FILING MODIFIED PROPOSED ORDER (A) APPROVING THE DISCLOSURE STATEMENT ON AN INTERIM BASIS, (B) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE PLAN, (C) APPROVING THE FORM OF BALLOT AND SOLICITATION MATERIALS, (D) ESTABLISHING VOTING RECORD DATE, (E) FIXING THE DATE, TIME, AND PLACE FOR THE HEARING ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN AND THE DEADLINE FOR FILING OBJECTIONS THERETO, AND <u>(F) APPROVING RELATED NOTICE PROCEDURES AND DEADLINES</u>

**PLEASE TAKE NOTICE** that, on May 30, 2025, the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the *Motion of the Debtors for Entry of an* Order (A) Approving the Disclosure Statement on an Interim Basis, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time, and Place for the Hearing on Final Approval of the Disclosure Statement and Confirmation of the Plan and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures and Deadlines [Docket No. 433] (the "<u>Motion</u>"). A proposed form of order was attached to the Motion as Exhibit A (the "<u>Initial Proposed Order</u>").

**PLEASE TAKE FURTHER NOTICE** that objections to approval of the Motion were due by June 13, 2025 at 4:00 (prevailing Eastern Time). The Debtors received formal and informal comments from, among others, the United States Trustee for the Northern District of Georgia, which have been incorporated into the modified proposed order attached hereto as **Exhibit A** (the "<u>Modified Proposed Order</u>").

<sup>&</sup>lt;sup>1</sup> The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at https://www.veritaglobal.net/AirPros. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.



**PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit B** is a blackline reflecting the modifications between the Initial Proposed Order and the Modified Proposed Order.

### PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion will be held before the Honorable Paul M. Baisier, United States Bankruptcy Judge, <u>Courtroom 1202 in the Richard B. Russell Federal Building and United States Courthouse</u>, 75 Ted Turner Drive, SW, Atlanta, Georgia, 30303 on June 23, 2025 at 9:30 a.m. (prevailing <u>Eastern Time)</u>.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in the above captioned chapter 11 cases are available free of charge by visiting the case website maintained by the Debtors' notice and claims agent, Kurtzman Carson Consultants, LLC dba Verita Global, at https://www.veritaglobal.net/AirPros or by calling (866) 927-7076. You may also obtain copies of any pleadings by visiting the Office of the Clerk, U.S. Bankruptcy Court for the Northern District of Georgia (Newnan Division) between 8:00 a.m. and 4:00 p.m. or online by visiting the Court's website http://ecf.ganb.uscourts.gov (registered users) at or at http://pacer.psc.uscourts.gov (unregistered users). Further information may be obtained by using the "Submit an Inquiry" function at https://www.veritaglobal.net/AirPros/inquiry.

Dated: June 18, 2025

Respectfully submitted,

#### **GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

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Counsel for the Debtors and Debtors in Possession

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2025, all ECF participants registered in these Chapter 11 Cases were served electronically with the foregoing notice through the Court's ECF system at their respective email addresses registered with this Court.

By: <u>/s/ David B. Kurzweil</u> David B. Kurzweil

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# <u>Exhibit A</u>

(Modified Proposed Order)

## <u>Exhibit B</u>

(Blackline)