



IT IS ORDERED as set forth below:

Date: December 16, 2025

Paul Baisier

**Paul Baisier
U.S. Bankruptcy Court Judge**

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

In re:

AFH AIR PROS, LLC,

Wind Down Debtor.

Chapter 11

Case No. 25-10356 (PMB)

Re: Docket No. 870

**CONSENT ORDER GRANTING VALLEY NATIONAL BANK LIMITED RELIEF
FROM THE PLAN INJUNCTION**

This matter came before the Court upon *Valley National Bank*, N.A.'s *Unopposed Motion for Relief From the Plan Injunction* dated December 15, 2025 [Docket No. 870] (the "Motion")¹ filed by Valley National Bank, N.A. ("Valley"); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue of these chapter 11 cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and Air Pros Solutions, LLC ("Solutions") and Valley are party to that certain Pledge Agreement dated July 5, 2024 (the "Pledge Agreement"), pursuant

¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.



to which Solutions pledged to Valley its interest in Account No. x7300 maintained at Valley (the “Pledged Account”) to secure certain obligations of Solutions to Valley arising under the Credit Documents (as defined in the Pledge Agreement); and Valley having issued a clean, irrevocable and unconditional standby letter of credit dated October 23, 2023 for the benefit of Continental Casualty Company and National Fire Insurance Company of Hartford in the aggregate amount of \$3,449,000 as of the Petition Date (as amended by Amendment No. 1 dated August 16, 2024, the “Letter of Credit”); and the beneficiary under the Letter of Credit having initiated a draw under the Letter of Credit in the full amount of \$3,449,000 on or about September 25, 2025; and Valley and the Wind Down Debtors having represented to the Court that they consent to the entry of this Order; and the Court finding that good cause exists to grant relief, subject to the agreed terms of this Order,

IT IS HEREBY ORDERED THAT:

1. Valley is granted relief from the injunction imposed under (i) Article X.F of the *Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates* [Docket No. 478] filed June 24, 2025, and (ii) paragraph 83 of the *Findings of Fact, Conclusions of Law, and Order (I) Approving the Second Amended Disclosure Statement for the Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and Its Debtor Affiliates on a Final Basis; and (II) Confirming Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and Its Debtor Affiliates* [Docket No. 691] entered September 4, 2025 (the “Plan Injunction”), to the extent set forth herein.

2. Valley is permitted to exercise its rights of setoff under the Pledge Agreement to set off the amounts held in the Pledged Account against the amounts drawn under the Letter of Credit.

3. Within seven days after Valley sets off the amounts held in the Pledge Account, Valley shall amend Claim No. 144 to reflect (i) the application of the funds in the Pledged Account, and (ii) that the balance of Claim No. 144, after application of the full amount of the Pledged Account, is a general unsecured claim.

4. The relief granted by this Order is limited to permitting Valley to exercise its rights of setoff under the Pledge Agreement and does not authorize the imposition of financial responsibility on the Wind Down Debtors or their respective estates or assets for the amounts drawn under the Letter of Credit. Nothing herein shall be deemed to amend, alter, or modify the rights of the parties with respect to the Pledged Account or amend, alter, or modify the terms of any agreements entered into in connection therewith, including, but not limited to, the Pledge Agreement, and the Wind Down Debtors and Valley reserve all rights with respect thereto.

5. Notwithstanding the applicability of Rule 4001(a)(4), this Order shall be effective and enforceable immediately upon entry hereof.

6. Counsel for the Wind Down Debtors shall serve a copy of this Order and file a Certificate of Service within three days after the entry of the Order.

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

END OF DOCUMENT

Consented to by:

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