

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

<p>In re:</p> <p>AFH AIR PROS, LLC,</p> <p>Wind Down Debtor.</p>	<p>Chapter 11</p> <p>Case No. 25-10356 (PMB)</p> <p>Objection Deadline: February 13, 2026</p> <p>Hearing Date/Time: February 19, 2026 at 1:30 PM</p>
---	--

UNOPPOSED MOTION FOR RELIEF FROM THE PLAN INJUNCTION

James and Marti Leftwich (“Movants”), by and through undersigned counsel, respectfully move this Court pursuant to Federal Rules of Bankruptcy Procedure 4001-1(C) and 9014, for entry of an order granting relief from the applicable injunction provision in the Plan and Confirmation Order (each as defined herein). As grounds, Movants state as follows:

JURISDICTION

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue lies properly in this Court pursuant to 28 U.S.C. § 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157.

BACKGROUND

2. On March 16, 2025, AFH Air Pros, LLC (“Debtor”) filed a Voluntary Petition pursuant to 11 U.S.C. Chapter 11, and the case is pending before this Court.

3. Prior to the Petition Date, on July 6, 2024, Movants filed a lawsuit in the Circuit Court of Mobile County, Alabama, Case No. Case No. 05-CV-2024-900944.00, against defendants Hansen Air Pros, LLC and Hansen Heating and Air, Inc., seeking money damages for claims of property damage and personal injuries to Movants and their minor children.



4. Upon the occurrence of the Petition Date, both defendants Hansen Air Pros, LLC and Hansen Heating and Air, Inc. are subject to the automatic stay entered herein, noting that Hansen Heating and Air, Inc. is not a debtor to this proceeding.

5. On September 4, 2025, the Court entered *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] (the “Confirmation Order”), which confirmed the *Second Amended Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates* [Docket No. 479] (as may be further amended, supplemented, or otherwise modified from time to time, and including all exhibits thereto, the “Plan”). The Effective Date of the Plan occurred on October 10, 2025. [Docket No. 753].

RELIEF REQUESTED

6. Movants have been advised that each of said defendants have at least one insurance policy that that will provide a defense and may satisfy all or part of any judgment entered against them in the Alabama state court action. Movants request relief pursuant to Section 362(d) of the Bankruptcy Code so that Movants may pursue the litigation, but only to the extent that there are insurance proceeds available to satisfy any judgment or settlement obtained against the defendants.

7. Section 362(d) provides:

On request of a party in interest and after notice and a hearing, the court shall grant relief from the stay provided under subsection (a) of this section, such as by terminating, annulling, modifying, or conditioning such stay – (1) for cause, including the lack of adequate protection of an interest in property of such party in interest; (2) with respect to a stay of an act against property under subsection (a) of this section, if – (A) the debtor does not have an equity in such property; and (B) such property is not necessary to an effective reorganization.

8. “Cause,” as used in Section 362(d), has no clear definition and is determined on a case-by-case basis. *See In re Syndicom Corp.*, 268 B.R. 26, 48 (Bankr. S.D.N.Y. 2001) (holding that “cause,” under section 362, “encompasses many different situations”); *In re Century/ML Cable Venture*, 294 B.R. 9, 34 (Bankr. S.D.N.Y. 2003); *In re Sea Group, Inc.*, 395 B.R. 852, 856 (Bankr. D. Del. 2007); *In re Tricare Rehabilitation Systems, Inc.*, 181 B.R. 569, 572-74 (Bankr. N.D. Ala. 1994) (court’s analysis of whether “cause” exists for granting relief from the stay).

9. As recently noted by the Fifth Circuit, “Courts often grant creditors relief from the automatic stay so they can adjudicate their unliquidated claims against a debtor outside of bankruptcy court, particularly when the claims are already the subject of pending litigation.” *Kipp Flores Architects LLC v. Mid-Continent Cas. Co.*, 852 F.3d 405, 414 (5th Cir. 2017).

10. There is cause to lift the stay imposed by the plan injunction so that the Movants may proceed in their litigation against the Debtor. Any recovery against the Debtor would solely come from insurance proceeds. The Debtor will not suffer any economic prejudice because the funds for any potential damages award would be from insurance. There is no compelling basis to oppose the relief requested herein.

11. Movants request that Bankruptcy Rule 4001(a)(4) be waived and that Movants be given relief from the automatic stay to pursue their claims against these defendants to the extent of any insurance coverage available.

12. Movants and the Debtor have conferred and each consent to the entry of the proposed consent order which is attached to the motion as **Exhibit A**.

13. Accordingly, Movants respectfully request that this Court:

- a. Grant Movants relief from the automatic stay under 11 U.S.C. Section 362(d) so as to allow them to seek recovery to pursue their claims against

defendants Hansen Air Pros, LLC and Hansen Heating and Air, Inc. to the extent of any insurance coverage available.

- b. Rule 4001(a)(4) be waived; and
- c. Grant such other and further relief as the Court deems to be just and proper.

Respectfully submitted this the 13th day of January, 2026.

BURR & FORMAN LLP

/s/ Derek F. Meek

Derek F. Meek

Georgia Bar No. #717193

Burr & Forman LLP

420 20th Street North, Suite 3400

Birmingham, Alabama 35203

Telephone: (205) 251-3000

E-mail: dmeek@burr.com

Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of January, 2026 I electronically filed the UNOPPOSED MOTION FOR RELIEF FROM THE PLAN INJUNCTION using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

David B. Kurzweil
Greenberg Traurig, LLP
Terminus 200 - Suite 2500
3333 Piedmont Road, NE
Atlanta, GA 30305

Jonathan Adams
Office of the United States Trustee
362 Richard B Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, postage prepaid on the following parties at the address shown for each.

AFH Air Pros, LLC
150 S. Pine Island Road, Suite 200
Plantation, FL 33324

**and attached creditor matrix

Dated January 13th, 2026

/s/ Derek F. Meek
Derek F. Meek
Georgia Bar No. #717193
Burr & Forman LLP
420 20th Street North, Suite 3400
Birmingham, Alabama 35203
Telephone: (205) 251-3000
E-mail: dmeek@burr.com

Counsel for Movant

Label Matrix for local noticing
113E-3
Case 25-10356-pmb
Northern District of Georgia
Newnan
Tue Jan 13 14:57:30 EST 2026

AFH Air Pros, LLC
150 S. Pine Island Road, Suite 200
Plantation, FL 33324-2695

Jonathan S. Adams
Office of the United States Trustee
362 Richard B Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303-3315

Air Pros Atlanta LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Blue Star, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Boca LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Colorado LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Dallas L.L.C.
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros One Source LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Solutions Holdings, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Solutions, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Texas LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros Washington, LLP
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros West LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Evan M. Altman
Evan M. Altman, Attorney at Law
Building 2
8325 Dunwoody Place
Atlanta, GA 30350-3307

AmeriCredit Financial Services, Inc. DBA GM
P O Box 183853
Arlington, TX 76096-3853

John R. Ashmead
Seward & Kissel LLP
One Battery Park Plaza
New York, NY 10004-1485

Danielle Barav-Johnson
Eversheds Sutherland (US) LLP
Suite 2300
999 Peachtree Street, N.E.
Atlanta, GA 30309-4416

Gregg S. Bateman
Seward & Kissel LLP
One Battery Park Plaza
New York, NY 10004-1485

Colin Michael Bernardino
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street, NE
Suite 2800
Atlanta, GA 30309-4530

Jason B. Binford
Kane Russell Coleman & Logan PC
401 Congress Ave, Ste 2100
Austin, TX 78701-3798

Kit Barron Bradshaw
Earl & Earl PLLC
4565 Hilton Pkwy, Ste 228
Colorado Springs, CO 80907-3560

Heather D Brown
Poole Huffman LLC
Bldg J, Ste 200
3562 Habersham at Northlake
Tucker, GA 30084-4015

Heather D. Brown
Poole Huffman, LLC
3562 Habersham@Northlake Bldg J Ste 200
Tucker, GA 30084-4015

Jeremy Patrick Burnette
Akerman LLP
Ste 17th Floor
999 Peachtree Street
Atlanta, GA 30309-4524

CM Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Shirley S. Cho
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067-4003

Christopher K. Coleman
King & Spalding LLP
Suite 1600
1180 Peachtree Street, NE
Atlanta, GA 30309-7525

Dallas Plumbing Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Despedida Holdings, Inc.
and Zerimar 1500, LLC
c/o Mr. Jose Ramirez
19033 SE Jupiter River DR
Jupiter, FL 33458-1052

Tyler S. Dischinger
Buchanan Ingersoll & Rooney PC
Suite 200
501 Grant Street
Pittsburgh, PA 15219-4413

Doug's Service Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Dream Team Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Jeff Dutson
King & Spalding
1180 Peachtree St NE
Atlanta, GA 30309-3531

Collin J. Earl
Ste. 228
4565 Hilton Pkwy
Colorado Springs, CO 80907-3560

East Coast Mechanical Home Services LLC
2021 McKinney Avenue
Suite 1200
Dallas, TX 75201-7664

East Coast Mechanical, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Ian M. Falcone
The Falcone Law Firm, P.C.
363 Lawrence Street
Marietta, GA 30060-2056

Betsy I. Feldman
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019-6099

Ford Motor Credit Company LLC
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Ebba Gebisa
Latham & Watkins LLP
Suite 2800
330 North Wabash Avenue
Chicago, IL 60611-3695

Andrew D. Gleason
Lefkoff Rubin Gleason Russo Williams PC
Suite 900
5555 Glenridge Connector
Atlanta, GA 30342-4762

Andrew Glenn
Glenn Agre Bergman & Fuentes LLP
22nd Floor
1185 Avenue of the Americas
New York, NY 10036-2603

Glenn E. Glover
Bradley Arant Boulton Cummings LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203-2120

Tara L. Grundemeier
Linebarger Goggan Blair & Sampson LLP
P.O. Box 3064
Houston, TX 77253-3064

Nikhil A. Gulati
Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020-1300

Hansen Air Pros, LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324-2695

Esther Hong
Glenn Agre Bergman & Fuentes
22nd Floor
1185 Avenue of the Americas
New York, NY 10036-2603

Anna Mari Humnicky
Small Herrin, LLP
100 Galleria Parkway
Suite 350
Atlanta, GA 30339-6473

Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

Jefferies LLC
520 Madison Avenue
New York, NY 10022-4344

Nathan G. Kanute
Snell & Wilmer L.L.P.
Suite 200
5520 Kietzke Lane
Reno, NV 89511-3041

Craig I. Kelley
Kelley Kaplan Delaney Eller, PLLC
Ste. 1000
1665 Palm Beach Lakes Blvd.
West Palm Beach, FL 33401-2109

Robert R. Kinas
Snell & Wilmer L.L.P.
Suite 700
1700 South Pavilion Center Dr.
Las Vegas, NV 89135-1865

Benjamin S. Klehr
Small Herrin, LLP
100 Galleria Parkway
Suite 350
Atlanta, GA 30339-6473

James Ktsanes
Latham & Watkins LLP
330 North Wabash Avenue
Suite 2800
Chicago, IL 60611-3695

Kurtzman Carson Consultants, LLC dba Verita
222 N. Pacific Coast Highway
Suite 300
El Segundo, CA 90245-5614

David B. Kurzweil
Greenberg Traurig, LLP
Terminus 200 - Suite 2500
3333 Piedmont Road, NE
Atlanta, GA 30305-1811

Paul J. Labov Pachulski Stang Ziehl & Jones LLP 36th Floor 1700 Broadway New York, NY 10019-5975	Caroline M. Lee Jones Walker LLP Ste 5100 201 St. Charles Ave. New Orleans, LA 70170-5101	Matthew W. Levin Scroggins, Williamson & Ray, P.C. Suite 230 4401 Northside Parkway Atlanta, GA 30327-3065
Lincoln Automotive Financial Services c/o AI 4515 N. Santa Fe Ave. Dept. APS Oklahoma City OK 73118-7901	Maxim B. Litvak Pachulski Stang Ziehl & Jones LLP Suite 3430 One Sansome Street San Francisco, CA 94104-4436	MB Plano Road, LLC
Cia H. Mackle Pachulski Stang Ziehl & Jones LLP 36th Floor 1700 Broadway New York, NY 10019-5975	Gary W. Marsh Troutman Pepper Locke LLP 600 Peachtree Street, NE, Suite 3000 Atlanta, GA 30308-2305	Andrew J. Matott Seward & Kissel LLP One Battery Park Plaza New York, NY 10004-1485
Mauzy Air Pros, LLC 150 S. Pine Island Road Suite 200 Plantation, FL 33324-2695	Kurt Mayr II Glenn Agre Bergman & Fuentes LLP 22nd Floor 1185 Avenue of the Americas New York, NY 10036-2603	Cameron M. McCord Jones & Walden, LLC 699 Piedmont Avenue NE Atlanta, GA 30308-1414
Mark A. Mintz Jones Walker LLP Suite 5100 201 St. Charles Ave. New Orleans, LA 70170-5100	James Edward Mitchell Office of the United States Attorney Suite 600 75 Ted Turner Dr. SW Atlanta, GA 30303-3309	(p)WHIT MORLEY 330 N WABASH AVENUE SUITE 2800 CHICAGO IL 60611-3695
Office of the United States Trustee 362 Richard Russell Building 75 Ted Turner Drive, SW Atlanta, GA 30303-3315	Timothy P. Palmer Buchanan Ingersoll & Rooney PC Suite 200 501 Grant Street Pittsburgh, PA 15219-4413	Jeffrey D Pawlitz Willkie Farr & Gallagher, LLP 787 Seventh Avenue New York, NY 10019-6099
Matthew Petrie Greenberg Traurig 3333 Piedmont Road NE Terminus 200 Suite 2500 Atlanta, GA 30305-1780	Richard Ramirez Glenn Agre Bergman & Fuentes LLP 22nd Floor 1185 Avenue of the Americas New York, NY 10036-2603	Hanna J Redd Troutman Pepper Locke LLP 111 Huntington Ave 9th Floor Boston, MA 02199-7618
Pierce Rigney Troutman Pepper Locke LLP 600 Peachtree St, NE, Ste 3000 Atlanta, GA 30308-2305	Philip L. Rubin Lefkoff Rubin Gleason Russo Williams PC Suite 900 5555 Glenridge Connector Atlanta, GA 30342-4762	Luis Salazar Cole Schotz PC 2121 SW 3rd Ave, Suite 200 Miami, FL 33129-1458
Bradford J. Sandler Pachulski Stang Ziehl & Jones, LLP 919 N. Market Street, 17th Floor Wilmington, DE 19801-3034	Secretary of the Treasury 15th & Pennsylvania Avenue, NW Washington, DC 20200	Henry F. Sewell Jr. Law Offices of Henry F. Sewell, Jr., LLC Suite 555 2964 Peachtree Road, NW Atlanta, GA 30305-4909
Gus H. Small Small Herrin, LLP 100 Galleria Parkway Suite 350 Atlanta, GA 30339-6473	A. Todd Sprinkle Parker Poe Adams & Bernstein LLP 1075 Peachtree Street NE Suite 1500 Atlanta, GA 30309-4018	Texas Taxing Authorities 1235 North Loop West, Suite 600 Houston, TX 77008-1772

John A. Thomson Jr.
Adams and Reese LLP
Suite 1750
3455 Peachtree Road, NE
Atlanta, GA 30326-4350

John Kendrick Turner
Linebarger Goggan Blair & Sampson, LLP
Suite 800
3500 Maple Avenue
Dallas, TX 75219-3959

U. S. Securities and Exchange Commission
Office of Reorganization
Suite 900
950 East Paces Ferry Road, NE
Atlanta, GA 30326-1382

United States of America on behalf of Small
75 Ted Turner Drive SW,
Suite 600
ATLANTA, GA 30303-3309

James W. Walker
Pachulski Stang Ziehl & Jones LLP
Suite 4500
700 Louisiana Street
Houston, TX 77002-2744

David Wender
Eversheds Sutherland (US) LLP
Suite 2300
999 Peachtree St., NE
Atlanta, GA 30309-3996

Elizabeth Wiehle
Perdue Brandon Fielder Collins & Mott, L
Suite 600
1235 North Loop West
Houston, TX 77008-1772

J. Robert Williamson
Scroggins, Williamson & Ray, P.C.
Suite 230
4401 Northside Parkway
Atlanta, GA 30327-3065

Jonathan W Young
Troutman Pepper Locke LLP
401 9th St, NW, Ste 100
Washington, DC 20004-2138

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Whit Morley
Latham & Watkins, LLP
330 North Wasbush Ave.
Suite 2800
Chicago, IL 60611

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)30590 LA16, LLC

(u)Alter Domus (US) LLC

(d)AmeriCredit Financial Services, Inc. dba G
P O Box 183853
Arlington, TX 76096-3853

(u)Baylie Annison

(u)Trey Annison

(u)Any Hour LLC

(u)Apex Service Partners

(u)Axa Family, LLC

(u)Buddy's Heating & Cooling, L.L.C.

(u)Columbia Home Services LLC

(u)Committee of Creditors Holdings Unsecured

(u)Continental Casualty Company and National

(u)Cypress-Fairbanks ISD

(u)Dallas County

(u)Jack Denton

(u)Doug's Service Company f/k/a Doug'

(u)Dream Team Services, LLC.

(u)Ford Motor Credit

(u)Google

(u)Hansen Super Techs, LLC

(u)Harris Co ESD #09

(u)Heat Transfer Systems of Georgia, LLC

(u)Andrew D.J. Hede

(u)OCIII LVS LXI LP

(u)OKG Group Inc.

(u)Reliance US Holdings II Inc

(u)Resources Connection LLC

(u)ServiceTitan, Inc.

(u)Southern Air of Thibodaux, LLC

(u)Tarrant County

(u)Jeffrey D. Tauzin

(u)U.S. BANK, NATIONAL ASSOCIATION

(u)Valley Bank, N.A.

(u)Valley National Bank

(u)Zerimar 1500, LLC

End of Label Matrix	
Mailable recipients	98
Bypassed recipients	35
Total	133

EXHIBIT A

PROPOSED CONSENT ORDER

**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. ____

**CONSENT ORDER GRANTING LIMITED RELIEF
FROM THE PLAN INJUNCTION**

This matter came before the Court upon the *Unopposed Motion for Relief from the Plan Injunction* dated January 13, 2026 [Docket No. ____] (the "Motion") filed by James and Marti Leftwich ("Movants"); 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 the Movants 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. Movants are granted relief from the injunction imposed under Article X.F of the *Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates* [Docket No. 478] (the “Plan Injunction”), filed on June 24, 2025, to pursue a direct action against the obligor under the applicable insurance policy with respect to the claims (the “Alabama Claims”) asserted by Movants in the Circuit Court of Mobile County, Alabama, Case No. 05-CV-2024-900944.00 (the “State Court Action”) against Hansen Air Pros, LLC (the “Debtor Defendant”).

2. The relief granted by this Order is limited to permitting Movants to assert the Alabama Claims against the obligor under the applicable insurance policy and does not authorize the imposition of financial responsibility for the Alabama Claims on the Debtor Defendant or any Wind Down Debtor or their respective estates or assets by any party. The Wind Down Debtors and their estates shall have no financial responsibility for any portion of the Alabama Claims asserted by Movants in the State Court Action or for any other financial obligations arising therefrom, and the Plan Injunction remains in full force and effect except as expressly provided in this Order.

3. Any amounts recovered by Movants outside of this Court and these chapter 11 cases relating to the Alabama Claims shall reduce, on a dollar-for-dollar basis, any claim filed by Movants in these chapter 11 cases.

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

5. 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.

6. 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

Prepared and presented by:

GREENBERG TRAUIG, LLP

/s/ Matthew A. Petrie

David B. Kurzweil (Ga. Bar No. 430492)
Matthew A. Petrie (Ga. Bar No. 227556)
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305
Telephone: (678) 553-2100
Email: kurzweild@gtlaw.com
petriem@gtlaw.com

Counsel for the Debtors and Debtors in Possession

Consented to by:

BURR & FORMAN, LLP

/s/ Derek F. Meek

Derek F. Meek
Georgia Bar No. #717193
Burr & Forman LLP
420 20th Street North, Suite 3400
Birmingham, Alabama 35203
Telephone: (205) 251-3000
E-mail: dmeek@burr.com

Counsel to Movants

Distribution List

Derek F. Meek (Ga Bar No. #717193)
Burr & Forman LLP
420 20th Street North, Suite 3400
Birmingham, Alabama 35203

David B. Kurzweil (Ga. Bar No. 430492)
Matthew A. Petrie (Ga. Bar No. 227556)
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305