

Fill in this information to identify the case:Debtor Air Pros Solutions, LLCUnited States Bankruptcy Court for the: Northern District of Georgia
(State)Case number 25-10364**Modified Official Form 410
Proof of Claim****12/24**

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

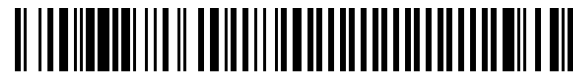
Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Equal Employment Opportunity Commission	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	☒ No ☐ Yes. From whom?	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? Equal Employment Opportunity Commission Megan K. OByrne 950 17th St., Ste. 300 Denver, CO 80202, United States	Where should payments to the creditor be sent? (if different) Charging Party and Aggrieved Individuals TBD TBD, TBD TBD
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Contact phone <u>720-779-3608</u> Contact email <u>megan.obyrne@eeoc.gov</u>	Contact phone _____ Contact email _____
	Uniform claim identifier (if you use one): _____	
4. Does this claim amend one already filed?	☒ No ☐ Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	☐ No ☒ Yes. Who made the earlier filing? <u>Cathy Love, See Addendum A</u>	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	☒ No ☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: __ __ __ __
7. How much is the claim?	\$ <u>See summary page</u> . Does this amount include interest or other charges? ☒ No ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. <u>Damages for discrimination on the basis of sex and retaliation.</u>
9. Is all or part of the claim secured?	☒ No ☐ Yes. The claim is secured by a lien on property. Nature or property: ☐ Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>. ☐ Motor vehicle ☐ Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % ☐ Fixed ☐ Variable
10. Is this claim based on a lease?	☒ No ☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	☒ No ☐ Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ _____

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/12/2025
MM / DD / YYYY

/s/Megan K. OByrne
Signature

Print the name of the person who is completing and signing this claim:

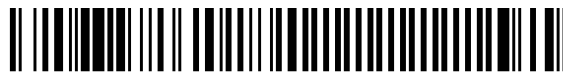
Name Megan K. OByrne
First name Middle name Last name

Title Trial Attorney

Company EEOC
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 927-7076 | International (310) 751-2650

Debtor: 25-10364 - Air Pros Solutions, LLC District: Northern District of Georgia, Newnan Division		
Creditor: Equal Employment Opportunity Commission Megan K. OByrne 950 17th St., Ste. 300 Denver, CO, 80202 United States Phone: 720-779-3608 Phone 2: 720-297-3872 Fax: Email: megan.obyrne@eeoc.gov	Has Supporting Documentation: Yes, supporting documentation successfully uploaded Related Document Statement:	
	Has Related Claim: Yes Related Claim Filed By: Cathy Love, See Addendum A	
	Filing Party: Authorized agent	
Disbursement/Notice Parties: Charging Party and Aggrieved Individuals TBD TBD, TBD, TBD Phone: Phone 2: Fax: E-mail: DISBURSEMENT ADDRESS		
Other Names Used with Debtor:	Amends Claim: No Acquired Claim: No	
Basis of Claim: Damages for discrimination on the basis of sex and retaliation.	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: Estimated at over 5.5 million.	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No Amount of 503(b)(9): No Based on Lease: No Subject to Right of Setoff: No	Nature of Secured Amount: Value of Property: Annual Interest Rate: Arrearage Amount: Basis for Perfection: Amount Unsecured:	
Submitted By: Megan K. OByrne on 12-Sep-2025 12:34:44 p.m. Pacific Time Title: Trial Attorney Company: EEOC		

United States Bankruptcy Court for the Northern District of Georgia, Newnan Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- | | | |
|--|---|--|
| ☐ AFH Air Pros, LLC (Case No. 25-10356) | ☐ Air Pros Solutions Holdings, LLC (Case No. 25-10363) | ☐ Dallas Plumbing Air Pros, LLC (Case No. 25-10370) |
| ☐ Air Pros Atlanta LLC (Case No. 25-10357) | ☐ Air Pros Solutions, LLC (Case No. 25-10364) | ☐ Doug's Service Air Pros, LLC (Case No. 25-10371) |
| ☐ Air Pros Blue Star, LLC (Case No. 25-10358) | ☐ Air Pros Texas LLC (Case No. 25-10365) | ☐ Dream Team Air Pros, LLC (Case No. 25-10372) |
| ☐ Air Pros Boca LLC (Case No. 25-10359) | ☐ Air Pros Washington, LLP (Case No. 25-10366) | ☐ East Coast Mechanical, LLC (Case No. 25-10373) |
| ☐ Air Pros Colorado LLC (Case No. 25-10360) | ☐ Air Pros West LLC (Case No. 25-10367) | ☐ Hansen Air Pros, LLC (Case No. 25-10374) |
| ☐ Air Pros Dallas L.L.C. (Case No. 25-10361) | ☐ Air Pros, LLC (Case No. 25-10368) | ☐ Mauzy Air Pros, LLC (Case No. 25-10375) |
| ☐ Air Pros One Source LLC (Case No. 25-10362) | ☐ CM Air Pros, LLC (Case No. 25-10369) | |

Modified Official Form 410 Proof of Claim

12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	☐ No ☐ Yes. From whom?	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name	Name
	Number Street	Number Street
	City State ZIP Code	City State ZIP Code
	Country	Country
	Contact phone	Contact phone
	Contact email	Contact email
	Uniform claim identifier (if you use one):	
4. Does this claim amend one already filed?	☐ No ☐ Yes. Claim number on court claims registry (if known) Filed on / / /	
5. Do you know if anyone else has filed a proof of claim for this claim?	☐ No ☐ Yes. Who made the earlier filing?	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. How much is the claim? \$ _____. Does this amount include interest or other charges?
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
- _____

9. Is all or part of the claim secured? ☐ No
☐ Yes. The claim is secured by a lien on property.
- Nature of property:**
- ☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
- ☐ Motor vehicle
- ☐ Other. Describe: _____
- Basis for perfection:** _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
- Value of property:** \$ _____
- Amount of the claim that is secured:** \$ _____
- Amount of the claim that is unsecured:** \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)
- Amount necessary to cure any default as of the date of the petition:** \$ _____
- Annual Interest Rate** (when case was filed) _____ %
- ☐ Fixed
- ☐ Variable

10. Is this claim based on a lease? ☐ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☐ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No

☐ Yes. Check all that apply:

Amount entitled to priority

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

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Check the appropriate box:

☐ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

MEGAN K. OBYRNE
Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code Country

Contact phone _____ Email _____



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Denver Field Office

950 17th Street, Suite 300

Denver, CO 80202

Intake Information Group: (800) 669-4000

Intake Information Group TTY: (800) 669-6820

Denver Direct Dial: (720) 779-3610

FAX (303) 866-1085

Website: www.eeoc.gov

Charge Number: 541-2022-00655

Cathy Love
P.O. Box 552
Pointblank, TX 77364

Charging Party

Air Pros Colorado LLC
3740 Interpark Drive
Colorado Springs, CO 80907

Respondents

Air Pros One Source LLC
3740 Interpark Drive
Colorado Springs, CO 80907

Air Pros Solutions, LLC a/k/a Air Pros USA
150 S. Pine Island Road
Plantation, FL 33020

Air Pros, LLC
2801 Evans Street
Hollywood, FL 33020

Air Today Holdings L.L.C.
c/o Anthony Perera
Exuma Capital Partners LLC
1250 South Pine Island Road, Ste. 500
Plantation, FL 33324

Any Hour LLC
c/o Shamik Patel, Dave Coghlan, Mike Irby
Knox Lane LP
655 Montgomery Street, Ste. 1905
San Francisco, CA 94111

Paychex PEO IV, LLC
911 Panorama Trail South
Rochester, NY 14625

LETTER OF DETERMINATION

On behalf of the U.S. Equal Employment Opportunity Commission (“the Commission”), I issue the following determination on the merits of the subject charge. Respondents Air Pros, LLC, Air

Letter of Determination
EEOC No. 541-2022-00655
Love v. Air Pros, LLC

Pros One Source LLC, Air Pros Colorado LLC, Air Pros Solutions, LLC, Air Today Holdings L.L.C., Any Hour LLC, and Paychex PEO IV, LLC are employers within the meaning of Title VII of the Civil Rights Act of 1964, as amended ("Title VII"). Timeliness and all other requirements for coverage have been met.

Charging Party alleges she and other female employees were discriminated against because of their sex and in retaliation for reporting harassment in violation of Title VII. Charging Party alleges male managers and non-managers subjected female employees to harassment that was severe or pervasive enough to create a hostile work environment based on sex. Charging Party also alleges Respondents discriminated against female employees with respect to hiring, promotions, work assignments, pay, training, discipline, termination, and other terms and conditions of employment.

Respondents deny the allegations.

Based on the evidence obtained during the investigation of this charge, I find there is reasonable cause to believe Respondents violated Title VII by subjecting Charging Party and other female and male employees to sexual harassment, a hostile work environment based on sex, and discharge or constructive discharge because of sex. I also find reasonable cause to believe Respondents violated Title VII by discriminating against female employees with respect to their compensation and by discriminating against Charging Party and other female employees with respect to their terms, conditions, or privileges of employment, including failing to promote qualified female employees, failing to provide equal training opportunities, and assigning female employees less desirable work than male employees. Finally, I find there is reasonable cause to believe Respondents violated Title VII by retaliating against Charging Party and other employees for engaging in protected activity.

On June 18, 2025, the Commission issued a subpoena to Respondent Air Pros, LLC after it failed to provide complete information in response to the Commission's Requests for Information. After Respondent Air Pros, LLC failed to fully respond to the subpoena and did not file a petition to revoke or modify the subpoena, the Commission informed Respondent Air Pros, LLC that it risked an adverse finding should it not provide all the requested information by July 15, 2025. Respondent Air Pros, LLC again failed to provide all the requested information. Inasmuch as Respondents have been afforded an opportunity to provide information requested by the Commission and have failed to do so, the Commission, at this time, determines that said silence constitutes an admission to the allegations made by Charging Party. In addition to the findings above, the Commission exercises its discretion to draw an adverse inference with respect to Charging Party's allegations based on Respondents' failure to respond to the Commission's subpoena.

Respondents are reminded that federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in the Commission's investigations is also prohibited. These protections apply regardless of the Commission's determination on the merits of the charge.

The determination is final. Having determined that there is reason to believe that a violation occurred, the Commission now invites the parties to join with it in a collective effort toward a just resolution of this matter. If Respondents decline to enter into settlement discussions, or when, for any other reason, a settlement acceptable to the Director is not obtained, the Director will inform

Letter of Determination
EEOC No. 541-2022-00655
Love v. Air Pros, LLC

the parties in writing and advise them of the court enforcement alternatives available to the Charging Party, aggrieved persons and the Commission.

Investigator Joseph Cosgrove will be contacting you shortly regarding conciliation discussions. You can reach Investigator Cosgrove at (720) 779-3615 or joseph.cosgrove@eeoc.gov.

On Behalf of the Commission:

**Sherrie
Hayashi**
Sherrie M. Hayashi
Field Office

Digitally signed by
Sherrie Hayashi
Date: 2025.08.19
13:19:44 -06'00'

Date

Cc:
Diane King
King Employment Law
1670 York Street
Denver, CO 80206
king@kingemploymentlaw.com

Michael J. Breaker
Jackson Lewis P.C.
950 17th Street, Ste. 2600
Denver, CO 80202
michael.breaker@jacksonlewis.com

David B. Kurzweil
Ari Newman
Leo Muchnik
Greenberg Traurig, LLP
3333 Piedmont Road, NE, Ste. 2500
Atlanta, Georgia 30305
kurzweild@gtlaw.com
newmanar@gtlaw.com
muchnikl@gtlaw.com

Jordi Guso
Michel Debolt
Berger Singerman LLP
1450 Brickell Avenue, Ste. 1900
Miami, FL 33131
jguso@bergersingerman.com
mdebolt@bergersingerman.com

Letter of Determination
EEOC No. 541-2022-00655
Love v. Air Pros, LLC

Elijah J. Hammans
W. Timothy Miller
Taft Stettinius & Hollister LLP
One Indiana Square, Ste. 3500
Indianapolis, IN 46204
ehammans@taftlaw.com
miller@taftlaw.com

Andrew Hede
Accordion
1201 W Peachtree Street NW, Ste. 975
Atlanta, GA 30309
ahede@accordion.com

Paychex
Claims Department
82 Hopmeadow Street
Simsbury, CT 06070
epclaims@paychex.com

Chubb Insurance
Legal Department
202 Halls Mill Road
Whitehouse Station, NJ 08889

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

In re:

AFH AIR PROS, LLC, *et al.*

Debtors.

Chapter 11

Case No. 25-10356 (PMB)

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION PROOF OF CLAIM
ADDENDUM A**

The EEOC's claims against debtors Air Pros Colorado LLC, Air Pros One Source LLC, Air Pros, LLC and Air Pros Solutions, LLC are based on discrimination on the basis of sex and retaliation in violation of Title VII of the Civil Acts of 1964 against Charging Party Cathy Love and a class of Aggrieved Individuals.