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

In re:		Chapter 11
AFH AIR PROS, LLC, et al., <sup>1</sup>		Case No. 25-10356 (PMB)
Debtors.		(Jointly Administered)
		Related to Docket Nos. 7,8,9,10,11,12,13,14,15,16,17,18
AGENDA FOR FIRST DAY HEARING		
Time and Date of Hearing:	March 18, 2025 at 1:00 p.m.(prevailing Eastern Time)	
Location of In-Person Hearing:	The Honorable Paul M. Baisier United States Bankruptcy Court for the Northern District of Georgia Lewis R. Morgan Federal Building and United States Courthouse 2nd Floor Courtroom 18 Greenville Street Newnan, Georgia 30263	
Location of Virtual Hearing:	Parties participating in the hearing virtually may do so by using the following link:	
https://www.zoomgov.com/j/1617069079?pwd=WG16TGpyM1Z6dFZ6YVlrUkZwQ2RiZz09 Phone Number: 833-568-8864 Meeting ID: 161 706 9079		
Copies of First Day Pleadings:	A copy of each first day pleading can be viewed on the Court's website at <u>www.ganb.uscourts.gov</u> and the website of the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants LLC dba Verita Global, at <u>https://www.veritaglobal.net/AirPros.</u> Further information may be obtained by using the "Submit an Inquiry" function at <u>https://www.veritaglobal.net/AirPros/inquiry</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 proposed 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, Plantation, Florida 33020.



## A. Introduction

1. *First Day Declaration*. Declaration of Andrew D.J. Hede in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 8]

## **B.** Matters Requested to be Heard at First Day Hearing

- 2. Consolidated Creditor Matrix List and Customer Noticing Motion. Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors (A) to Prepare and Maintain a Consolidated Master List of Creditors in Lieu of Submitting a Formatted Mailing Matrix for Each Debtor, (B) to Redact Personally Identifiable Information for Individual Creditors and Parties in Interest, and (C) to Provide Electronic Notice to Individual Customers and Maintain a Confidential Customer Service List [Docket No. 7]
- 3. *Schedules and Statements Extension Motion.* Emergency Motion of the Debtors for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 9]
- 4. *Claims Agent Retention Application.* Debtors' Emergency Application for Entry of an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date [Docket No. 10]
- 5. Cash Management Motion. Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business Forms and Checks, (II) Authorizing the Continued Use of Cash Management System, (III) Waiving Certain Investment and Deposit Guidelines, (IV) Authorizing the Debtors to Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (V) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. 11]
- 6. *Customer Programs Motion*. Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in The Ordinary Course of Business [Docket No. 12]
- 7. Insurance Motion. Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies, Pay all Policy Premiums, and Renew or Enter Into New Policies, and (B) Continue Insurance Premium Financing Program, Pay Insurance Premium Financing Obligations Arising in Connection Therewith, and Renew Such Premium Financing Arrangements; (II) Authorizing the Debtors to Maintain Their Surety Bond Program, Pay Obligations in Connection Therewith, and Renew or Obtain New Surety Bonds; and (III) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related Thereto [Docket No. 13]
- 8. *Taxes Motion.* Emergency Motion of the Debtors for Entry of an Order Authorizing (I) the Debtors to Pay Prepetition Taxes and Regulatory Fees in the Ordinary Course

of Business and (II) Banks and Financial Institutions to Honor and Process Checks and Transfers Related Thereto [Docket No. 14]

- 9. Utilities Motion. Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Service, (II) Deeming Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance of Payment [Docket No. 15]
- 10. Wages & Benefits Motion. Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) All Prepetition Employee Obligations and Dues and (B) Prepetition Withholding Obligations, and (II) Directing Banks to Honor Related Transfers [Docket No. 16]
- 11. DIP Financing/Cash Collateral Motion. Emergency Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing and to Use Cash Collateral, (B) Granting Liens and Superpriority Claims, (C) Granting Adequate Protection, (D) Modifying the Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [Docket No. 17]
  - a. *DIP Declaration.* Declaration of Jeffrey Finger in Support of the Emergency Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing and to Use Cash Collateral, (B) Granting Liens and Superpriority Claims, (C) Granting Adequate Protection, (D) Modifying the Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [Docket No. 18]

Dated: March 17, 2025

Respectfully submitted,

## **GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil 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

Proposed Counsel for the Debtors and Debtors in Possession