

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

| | | |
|---|---|----------------------------------|
| In re: |) | |
| |) | |
| |) | Chapter 11 |
| WELLMADE FLOOR COVERINGS |) | |
| INTERNATIONAL, INC., <i>et al.</i> , ¹ |) | Case No. 25-58764 |
| |) | |
| Debtors. |) | (Joint Administration Requested) |
| |) | |

**EMERGENCY MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (I)
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 AND (B) TO REDACT
PERSONALLY IDENTIFIABLE INFORMATION FOR INDIVIDUAL CREDITORS
AND PARTIES IN INTEREST, AND (II) APPROVING THE FORM AND MANNER OF
NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CHAPTER 11
CASES AND OTHER INFORMATION**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), submit this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), pursuant to sections 105(a), 107, and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), Rules 1007 and 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rules 9006-2, 9013-1, and 9013-2 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), authorizing the Debtors to (i) prepare and maintain a consolidated list of creditors (the “Consolidated Creditor Matrix”) in lieu of submitting a separate formatted mailing matrix for each Debtor and (ii) redact certain personally identifiable information for the Debtors’ employees, former employees, and customers; and approving the form and manner of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.



notifying the creditors of the commencement of these Chapter 11 Cases and other information. In support of the relief requested in this Motion, the Debtors rely upon and incorporate by reference the *Declaration of David Baker in Support of Chapter 11 Petitions and First Day Pleadings* (“First Day Declaration”) filed contemporaneously herewith. In further support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 105(a), 107, and 521 of the Bankruptcy Code, Bankruptcy Rules 1007 and 2002, Local Rules 9006-2, 9013-1, and 9013-2, and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”).

BACKGROUND

3. On August 4, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. No official committee has been appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and no request has been made for the appointment of a trustee or an examiner.

6. Additional information regarding the Debtors' businesses, capital structure, and the circumstances leading to the filing of these Chapter 11 Cases is set forth in the First Day Declaration.

RELIEF REQUESTED

7. The Debtors request entry of the Proposed Order authorizing the Debtors (a) to prepare and maintain a Consolidated Creditor Matrix in lieu of (i) submitting a formatted mailing matrix for each Debtor and (ii) filing the Consolidated Creditor Matrix on the docket; (b) to redact certain personally identifiable information for certain individual creditors and parties in interest; and (c) to approve the form and manner of notifying the creditors of the commencement of these Chapter 11 Cases and other information.²

BASIS FOR RELIEF

A. The Court Should Authorize the Debtors to Prepare and Maintain a Consolidated Creditor Matrix in Lieu of Submitting Separate Mailing Matrices for Each Debtor

8. Section 521(a) of the Bankruptcy Code and Bankruptcy Rule 1007(a)(1) require a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each creditor. Local Rule 5005-1(j) further provides that, in the main case, the debtor "must file a list of all creditors."

9. The Debtors maintain various lists of the names and addresses of their respective creditors that are entitled to receive notices and other documents in these Chapter 11 Cases. The Debtors believe these lists may be consolidated and utilized efficiently to provide interested parties with notices and other similar documents as contemplated by Local Rule 5005-1(j).

² Pursuant to Section C(2) of the Complex Case Procedures, the Debtors filed a list of the 30 largest unsecured creditors on a consolidated basis with each of their petitions.

10. The Debtors submit that permitting them to prepare and maintain a single Consolidated Creditor Matrix, rather than filing a separate creditor matrix for each Debtor, is warranted under the circumstances of these Chapter 11 Cases. Specifically, maintaining a single Consolidated Creditor Matrix will benefit the Debtors and their estates by allowing the Debtors to provide required notices more efficiently to parties-in-interest and reduce the potential for duplicate mailings. Indeed, in many instances, the Debtors' creditors overlap and thus, to the extent that the Debtors are required to maintain separate mailing matrices, a substantial number of parties will likely receive multiple copies of the same notice.

11. The Debtors estimate that there are hundreds of potential creditors and parties-in-interest in these Chapter 11 Cases. As such, requiring the Debtors to comply with the matrix requirements would be an exceptionally burdensome task and would greatly increase the risk of error and the concomitant costs.

12. Contemporaneous with the filing of this Motion, the Debtors are filing an application for an order authorizing the retention and employment of Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "Claims and Noticing Agent") as their claims and noticing agent. The Debtors, working with the Claims and Noticing Agent, have prepared a single Consolidated Creditor Matrix in electronic format. To ensure that no parties-in-interest are prejudiced, the Debtors (via the Claims and Noticing Agent) will make their consolidated list of creditors available in readable, electronic format to any party-in-interest who so requests (or in non-electronic format at such requesting party's sole cost and expense). The Debtors therefore submit that the preparation and maintenance of a single Consolidated Creditor Matrix is warranted under the facts and circumstances present in these Chapter 11 Cases.

13. If the request is granted, the Claims and Noticing Agent will, among other things, complete the mailing of the applicable notices to the parties in the Consolidated Creditor Matrix as required by Bankruptcy Rule 2002. The Debtors believe that filing a Consolidated Creditor Matrix will enable the Claims and Noticing Agent to provide notice efficiently to all entitled parties.

14. Courts in this and other jurisdictions have approved relief similar to the relief requested herein. *See, e.g., In re OTB Holding LLC*, Case No. 25-52415 (SMS) (Bankr. N.D. Ga. Mar. 7, 2025) [Docket No. 54] (authorizing maintenance of consolidated matrix of creditors in lieu of filing separate mailing matrices); *In re LaVie Care Ctrs., LLC*, Case No. 24-55507 (PMB) (Bankr. N.D. Ga. June 27, 2024) [Docket No. 175] (authorizing filing of consolidated matrix of creditors in lieu of separate mailing matrices); *see also In re BurgerFi Int'l, Inc.*, Case No. 24-12017 (CTG) (Bankr. D. Del. Sep. 16, 2024) [Docket No. 47] (same); *In re Forever 21, Inc.*, Case No. 19-12122 (KG) (Bankr. D. Del. Oct. 1, 2019) [Docket No. 100] (same); *In re Blackhawk Mining, LLC*, Case No. 19-11595 (LSS) (Bankr. D. Del. July 22, 2019) [Docket No. 60] (same).

B. The Court Should Authorize the Debtors to Redact Certain Personally Identifiable Information for Certain Individual Creditors and Parties in Interest

15. Section 107 of the Bankruptcy Code provides that this Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual . . . [a]ny means of identification . . . contained in a paper filed, or to be filed in a case under” the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A).

16. The Debtors respectfully submit that cause exists to authorize the Debtors to redact from any paper filed or to be filed with the Court in these chapter 11 cases the address information of the Debtors’ employees, former employees, and customers to the extent they appear on the

creditor matrix because such information could be used, among other things, to perpetrate identity theft or to locate survivors of domestic violence, harassment, or stalking. This risk is not merely speculative as there have been examples in the past where non-interested parties have utilized the publicly available information in bankruptcy cases to track down, stalk or otherwise contact individuals involved in bankruptcy cases. In at least one chapter 11 case, the abusive former partner of a debtor's employee exploited the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee at the employee's address that had not been publicly available until then, forcing the employee to change addresses again for safety reasons.³

17. The Debtors propose to provide an unredacted version of the Consolidated Creditor Matrix and any other applicable filings to the Court, the Office of the United States Trustee (the "U.S. Trustee"), counsel to any official committee of unsecured creditors appointed in these Chapter 11 Cases (if any), and other necessary parties in interest upon reasonable request.

18. Courts in this jurisdiction and others have granted the relief requested herein in comparable chapter 11 cases. *See, e.g., In re OTB Holding LLC*, Case No. 25-52415 (SMS) (Bankr. N.D. Ga. Mar. 7, 2025) [Docket No. 54] (authorizing the debtors to redact personally identifiable information of individuals); *In re LaVie Care Ctrs., LLC*, Case No. 24-55507 (PMB) (Bankr. N.D. Ga. June 27, 2024) (authorizing the debtors to redact personally identifiable information of individuals); *see also In re Franchise Grp., Inc.*, Case No. 24-12480 (JTD) (Bankr. D. Del. Nov. 6, 2024) [Docket No. 175] (authorizing the debtors to redact personally identifiable information of individuals); *In re BurgerFi Int'l, Inc.*, Case No. 24-12017 (CTG) (Bankr. D. Del. Sept. 16, 2024) [Docket No. 47] (authorizing the debtors to redact the home addresses of certain

³ The referenced incident, which took place during the *Charming Charlie* chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. July 11, 2019) [Docket No. 4].

individuals); *In re Forever 21, Inc.*, Case No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019) [Docket No. 598] (authorizing the debtors to redact the home addresses of the debtors' employees); *In re Anna Holdings, Inc.*, Case No. 19-12551 (CSS) (Bankr. D. Del. Dec. 3, 2019) [Docket No. 109] (authorizing the debtors to redact personally identifiable information of all individual creditors and interest holders); *In re Loot Crate, Inc.*, Case No. 19-11791 (BLS) (Bankr. D. Del. Oct. 1, 2019) [Docket No. 253] (authorizing the debtors to file lists of customer creditors under seal).

19. Indeed, in *In re Dex Media*, the United States Trustee objected to the debtors' request to redact employees' addresses, arguing that there was no basis for treating employees differently from other creditors absent specific identifiable harm. The bankruptcy court overruled an objection by the United States Trustee to the debtors' request to redact individual's addresses, recognizing the importance of protecting individuals from unnecessary security risk:

I think, that in the present day, with the abuse of private information, that these addresses ought to be redacted, and so, you know, I just think that individuals whose only position is to have been former employees, for example, ought not to have their home addresses listed publicly. I think that that is -- creates a possibility of abuse and so, I am going to grant the order [to seal].

Hr'g Tr. at 21:13-21, *In re Dex Media, Inc.*, No. 16-11200 (KG) (Bankr. D. Del. May 18, 2016).

20. Based on the foregoing, the Debtors respectfully submit that cause exists to authorize the Debtors to redact, pursuant to section 107(c)(1) of the Bankruptcy Code, personally identifiable information of the Debtors' employees and former employees who are listed on the creditor matrix or any other document filed with the Court. Absent such relief, the Debtors would unnecessarily render such individuals more susceptible to identity theft and could jeopardize the safety of these individuals by publishing their home addresses without any advance notice or opportunity to opt out or take protective measures.

C. The Court Should Approve the Proposed Procedures for the Service of Notice of Commencement and the Meeting of Creditors

21. Bankruptcy Rule 2002(a) provides, in relevant part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of . . . the meeting of creditors under § 341 or § 1104(b) of the [Bankruptcy] Code.” Fed. R. Bank. P. 2002(a)(1). Bankruptcy Rule 2002 further provides that notice of the order for relief shall be sent by mail to all creditors and shareholders. Fed. R. Bank. P. 2002(d) and (f).

22. The Debtors propose that the Claims and Noticing Agent undertake all mailings directed by the Court, the U.S. Trustee, or as required by section 342(a) of the Bankruptcy Code and Bankruptcy Rule 2002(a) and (f), including the notice of commencement of these chapter 11 cases, substantially in the form attached hereto as Exhibit 1 to Exhibit A (the “Notice of Commencement”), on all parties entitled to notice of commencement of the cases to advise them of the commencement of these Chapter 11 Cases and to provide important case information, including notice of the Debtors’ meeting of creditors under section 341 of the Bankruptcy Code (the “Meeting of Creditors”).

23. The Claims and Noticing Agent’s assistance with the mailing and preparation of creditor lists and notices will ease administrative burdens that otherwise would fall upon the Court and the U.S. Trustee.

24. Accordingly, the Debtors submit that the proposed maintenance of an electronic list of creditors by the Claims and Noticing Agent, the filing of the Consolidated Top 30 List, and the authority for the Claims and Noticing Agent to mail the Notice of Commencement is appropriate under the facts and circumstances present here, and consistent with the applicable provisions of

the Bankruptcy Code, the Bankruptcy Rules, the Local Rules for the United States Bankruptcy Court for the Northern District of Georgia, and the Complex Case Procedures.

25. Further, courts in this and other districts have routinely granted relief similar to the relief requested herein. *See, e.g., In re OTB Holding LLC*, Case No. 25-52415 (SMS) (Bankr. N.D. Ga. Mar. 7, 2025) [Docket No. 54]; *In re LaVie Care Centers, LLC*, Case No. 24-55507 (Bankr. N.D. Ga. June 27, 2024) [Docket No. 175]; *In re Steward Health Care System LLC*, Case No. 24-90213 (CML) (Bankr. S.D. Tex. May 7, 2024) [Docket No. 90]; *In re Casa Systems, Inc.*, Case No. 24- 10695 (KBO) (Bankr. D. Del. Apr. 25, 2024) [Docket No. 203]; *In re Sientra, Inc.*, Case No. 24- 10245 (JTD) (Bankr. D. Del. Apr. 9, 2024) [Docket No. 275]; *In re ConvergeOne Holdings, Inc.*, Case No. 24-90194 (CML) (Bankr. S.D. Tex. Apr. 4, 2024) [Docket No. 74]; *In re SC Healthcare Holding, LLC*, Case No 24-10443 (TMH) (Bankr. D. Del. Mar. 22, 2024) [Docket No. 80]; *In re The Krystal Company*, Case No. 20-61605 (PWB) (Bankr. N.D. Ga. Jan. 23, 2020) [Docket No. 47]; *In re Jack Cooper Ventures, Inc.*, Case No. 19-62393 (PWB) (Bankr. N.D. Ga. Aug. 9, 2019) [Docket No. 75].

NOTICE

26. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee for the Northern District of Georgia; (b) the Debtors' prepetition lender; (c) creditors holding the 30 largest unsecured claims against the Debtors; (d) the United States Attorney for the Northern District of Georgia; (e) the Georgia Department of Revenue; (f) the Internal Revenue Service; (g) the Securities & Exchange Commission; (h) the Georgia Secretary of State; (i) the states attorneys general for states in which the Debtors conduct business; and (j) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

27. No prior request for the relief sought in this Motion has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Date: August 4, 2025
Atlanta, Georgia

Respectfully Submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod, GA Bar No. 246604

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Proposed Counsel for the Debtors in Possession

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

| | | |
|---|---|----------------------------------|
| In re: |) | |
| |) | |
| |) | Chapter 11 |
| WELLMADE FLOOR COVERINGS |) | |
| INTERNATIONAL, INC., <i>et al.</i> , ¹ |) | Case No. 25-58764 |
| |) | |
| Debtors. |) | (Joint Administration Requested) |
| |) | |
| |) | Re: Docket No. 4 |

ORDER (I) 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, AND (B) TO REDACT PERSONALLY IDENTIFIABLE INFORMATION FOR INDIVIDUAL CREDITORS AND PARTIES IN INTEREST, AND (II) APPROVING THE FORM AND MANNER OF NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CHAPTER 11 CASES AND OTHER INFORMATION

Upon the *Emergency Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors (A) to Prepare and Maintain a Consolidated Master List of Creditors in Lieu of*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

Submitting a Formatted Mailing Matrix for Each Debtor, and (B) to Redact Personally Identifiable Information for Individual Creditors and Parties in Interest, and (II) Approving the Form and Manner of Notifying Creditors of the Commencement of These Chapter 11 Cases and Other Information (the “Motion”);² and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having jurisdiction to enter a final order consistent with Article III of the United States Constitution; 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 it appearing that due and adequate notice of the Motion has been given under the circumstances; and this Court having held a hearing (the “Hearing”) to consider the relief requested in the Motion; and upon the First Day Declaration and the record of the Hearing, this Court having determined that there is good and sufficient cause for the relief set forth in this Order; and after due deliberation thereon,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED to the extent provided herein.
2. The requirements under the Bankruptcy Rules and Local Rules that separate mailing matrices be filed for each Debtor are waived.
3. In lieu of submitting a formatted mailing matrix or filing the Consolidated Creditor Matrix (as defined below) on the docket, the Debtors, with the assistance of the Claims and Noticing Agent (upon the Court’s approval of the Debtors’ retention of the Claims and Noticing Agent), shall make available a single, consolidated list of all of the Debtors’ creditors (the “Consolidated Creditor Matrix”) in electronic form to any entity who so requests and in non-electronic form at such requesting entity’s sole cost and expense.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

4. The Debtors are authorized to redact the residential addresses and any other personally identifiable information (with the exception of names) of the Debtors' individual creditors, including employees, former employees, and customers, on any paper filed or to be filed with the Court in these Chapter 11 Cases; provided that the Debtors shall provide an unredacted version of the Consolidated Creditor Matrix to (a) the Clerk of the Court, (b) Kurtzman Carson Consultants, LLC d/b/a Verita Global, as the Debtors' claims and noticing agent (the "Claims and Noticing Agent"), (c) the U.S. Trustee, (d) counsel to the official committee of unsecured creditors appointed in these Chapter 11 Cases (if any), and (e) any other necessary party upon reasonable request.

5. The Debtors are authorized to serve the Notice of Commencement, substantially in the form attached hereto as **Exhibit 1**, to all parties in interest in accordance with Bankruptcy Rule 2002. Service of the Notice of Commencement shall be deemed adequate and sufficient notice of the commencement of these Chapter 11 Cases.

6. The Debtors, with the assistance of the proposed Claims and Noticing Agent (upon the Court's approval of the Debtors' retention of the Claims and Noticing Agent), are authorized, but not directed, to undertake all mailings directed by the Court, the U.S. Trustee as required by the Bankruptcy Code, the Bankruptcy Rules, and the Complex Case Procedures, as applicable, including the Notice of Commencement of these Chapter 11 Cases, and any other correspondence that the Debtors may wish to send creditors.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

8. Notwithstanding any applicable Bankruptcy Rule, this Order shall be effective and enforceable immediately upon entry hereof.

9. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this Order.

END OF DOCUMENT

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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Proposed Counsel for the Debtors in Possession

Exhibit 1

Proposed Notice of Commencement

| Information to identify the case: | | | |
|---|---|-----------------------------------|---------------------------------|
| Debtor | Wellmade Floor Coverings International, Inc. <small>Name</small> | EIN | 5 6 - 2 3 2 8 4 2 5 |
| United States Bankruptcy Court for the: | Northern | District of | GA <small>(State)</small> |
| Case number: | Lead Case 25-58764, Jointly Administered | [Date case filed for chapter 11] | 08/04/2025 MM / DD / YYYY OR |
| | | [Date case filed in chapter] | MM / DD / YYYY |
| | | Date case converted to chapter 11 | MM / DD / YYYY |

Official Form 309F (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

12/17

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

| | | | |
|---|--|---------------------|-------------------------|
| 1. Debtor's full name: | All Other Names Used in Last 8 Years: | Case Number: | Tax I.D. Number: |
| Wellmade Floor Coverings International, Inc. | N/A | 25-58764 | 56-2328425 |
| 2. Other Debtor Names & Case Numbers: | | | |
| Wellmade Industries MFR. N.A LLC | | 25-58760 | 84-4771085 |
| 3. Address: | | | |
| 1 Wellmade Drive, Cartersville, GA 30121 | | | |
| 4. Debtor's attorney | | | |
| GREENBERG TRAURIG, LLP John D. Elrod, Esq. Allison J. McGregor, Esq. 3333 Piedmont Road, NE, Suite 2500 Atlanta, GA 30305 | Telephone: 678-553-2259 Email: elrodj@gtlaw.com Email: Allison.McGregor@gtlaw.com | | |
| 5. Bankruptcy clerk's office | Hours open: Monday – Friday 8:00 AM – 4:00 PM Contact phone: (404)–215–1000 | | |
| | Documents in this case may be filed at this address: Clerk of the United States Bankruptcy Court 75 Ted Turner Drive, SW Atlanta, Georgia 30303 | | |
| | You may inspect all records filed in this case at this office or online at www.pacer.gov or at the Debtors' restructuring website at www.veritaglobal.net/Wellmade . | | |

For more information, see page 2 ►

Debtor Wellmade Floor Coverings International, Inc., et al. Case number (if known) 25-
Name

6. Meeting of creditors

The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so. The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

Date: _____

Location: The meeting will be held telephonically - please dial _____
The access code is _____.

7. Proof of claim deadline

Deadline for filing proof of claim: Not yet set. If a deadline is set, the court will send you another notice.

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- ☐ your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- ☐ you file a proof of claim in a different amount; or
- ☐ you receive another notice.

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at www.pacer.gov.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint byimposed by Federal Rule of Bankruptcy Procedure 4007(c).

9. Creditors with a foreign address

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

10. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.

11. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.

Distribution List

Wellmade Floor Coverings International, Inc.
Aurora Management Partners
1197 Peachtree St NE, Suite 780
Atlanta, GA 30361
Attn: David Baker

Greenberg Traurig, LLP
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305
Attn: John D. Elrod

Kurtzman Carson Consultants LLC d/b/a Verita Global
222 N. Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245
Attn: Drake D. Foster

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