

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

In re:

WELLMADE FLOOR COVERINGS  
INTERNATIONAL, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-58764-sms

(Joint Administration Requested)

**REQUEST FOR EXPEDITED CONSIDERATION OF  
CERTAIN FIRST DAY MATTERS**

On August 4, 2025, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors assert that the cases qualify as “Complex Chapter 11 Cases” and that they need expedited consideration of the following initial case matters (check those that apply):

- X *Emergency Motion of the Debtors for Entry of an Order Authorizing and Directing the Joint Administration of the Debtors’ Chapter 11 Cases for Procedural Purposes Only* [Docket No. 3]
- X *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* [Docket No. 4]
- X *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. 5]
- X *Emergency Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita*

<sup>1</sup> 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.



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*Global as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date [Docket No. 7]*

X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Wages, Payroll Taxes, Certain Employee Benefits, and Related Expenses and (II) Directing Banks to Honor Related Transfers [Docket No. 8]*

X *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. 9]*

X *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 and Continue their Surety Bond Program, Pay Obligations in Connection therewith, and Renew Such Surety Bonds; and (III) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related thereto [Docket No. 10]*

X *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 Corporate Card Program and Honor Prepetition Obligations Related thereto, and (V) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. 11]*

X *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. 12]*

X *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. 15]*

X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of (A) 503(B)(9) Claimants, (B) Critical Vendors, and (II) Granting Related Relief [Docket No. 17]*

Dated: August 5, 2025

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ John D. Elrod

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