

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,

Debtor.

CASE NO. 25-58764-sms

CHAPTER 11

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

COME NOW Daniel Werner and Elaine Woo of Radford Scott LLP, and hereby enters his appearance as counsel for **Creditors Yu Cong Liu, Yixiang Zhang, Can Gen Han, Nan Liu, Hai Tao Sun, Yao Yan, Jiansheng Yin, Shenxiang Yu, and Shuai Zhang** in the above-captioned case pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure and requests, pursuant to Rules 2002 and 9007 of the Federal Rules of Bankruptcy Procedure and applicable provisions of the Bankruptcy Code, that all notices, pleadings, and other documents filed or served in this case by served upon the undersigned at the following address:

Daniel Werner
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Decatur, GA 30030
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PLEASE TAKE FURTHER NOTICE that this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, disclosure statements, and any other documents or items which may be filed or served in this case.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed as a waiver of any rights, including, without limitation, the right to (i) have final orders in non-core matters entered only after de novo review by a district judge, (ii) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) seek relief from the stay of proceedings and continue to pursue litigation against individuals and entities other than Debtors Wellmade Industries MFR. N.A LLC and Wellmade Floor Coverings International, Inc. in the matter of *Liu, et al. v. Wellmade Industries Mfr., N.A. LLC, et al.*, No 4:25-cv-00134-WMR (N.D. Ga.), and/or (v) any other rights, claims, actions, setoffs, or recoupments to which the creditor is or may be entitled, in law or in equity, all of which are expressly reserved.

Respectfully submitted this day: August 8, 2025.

/s/ Daniel Werner

Daniel Werner

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Shenxiang Yu, and Shuai Zhang*

CERTIFICATE OF SERVICE

This is to certify that, on August 8, 2025, I electronically filed the foregoing document with the Court using the CM/ECF system, which sent notification of such filing to the parties indicated below:

- John D. Elrod, Wellmade Floor Coverings International, Inc. and Wellmade Industries MFR. N.A. LLC: elrodj@gtlaw.com
- Lindsay P.S. Kolba, Office of the United States Trustee: lindsay.p.kolba@usdoj.gov
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/s/ Daniel Werner
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