

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

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

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**SECOND STATUS REPORT BY CREDITORS YUCONG LIU, YIXIANG ZHANG, AND
CANGEN HAN'S ON DEBTORS' MOTION SEEKING ENTRY OF AN ORDER
SETTING A BAR DATE FOR FILING PROOFS OF CLAIM AND OTHER RELIEF**

1. On Friday, October 3, 2025, Creditors Yucong Liu, Yixiang Zhang, and Cangen Han (the "Labor Plaintiffs") filed a Status Report pertaining to the Debtors' Motion Seeking Entry of an Order Setting a Bar Date for Filing Proofs of Claim and Other Relief (ECF No. 137 (the "Motion")) and their Limited Objection (ECF No. 171) thereto.¹

2. On Saturday, October 4, 2025, the Debtor proposed a call between the Debtor, the Committee, and the Labor Plaintiffs, which the parties agreed to hold on the morning of Sunday, October 5, 2025. The Labor Plaintiffs' renewed request to provide the spreadsheet of individuals who would receive notice was again denied.

3. During the October 5, 2025 meeting on Zoom, the Debtors provided only an oral status update, but provided no information in writing.

4. Previously, on October 2, 2025, the Labor Plaintiffs notified Debtors' counsel that some of the Labor Plaintiffs had recently received a WeChat invitation from an entity "江苏源美竹木业有限责任公司." The English name of this entity is "Wellmade Floor Industries Co., Ltd."

¹ The defined terms have the same meaning as in the Motion and the Labor Plaintiffs' Limited Objection, unless otherwise noted.



5. During the October 5 Zoom call, the Debtor represented that Debtors had no means of contacting any former employees or contractors via WeChat.

6. During the October 5 Zoom call, the Debtor represented that it had no documents or records concerning any of the Visa Workers (i.e. Chinese workers who obtained visas to work at the Georgia factory), including the three named plaintiffs in the District Court litigation and several other similarly-situated individuals represented by Labor Plaintiffs' counsel. Several of these individuals worked at the Georgia factory for over two years.

7. In order to assist the Court in understanding the outstanding issues between the parties, the Labor Plaintiffs are providing several exhibits.

- a. **Exhibit A.** A letter on Wellmade letterhead, signed by Morgan Chen, addressed to the U.S. Consulate General and requesting that Mr. Yao YAN be provided a visa to work for Debtors at their Georgia factory.
- b. **Exhibit B.** An "Offer of Employment" from the Debtor to Mr. Nan LIU, one of the Labor Plaintiffs.
- c. **Exhibit C.** A screenshot of the WeChat invitation received by one of the Labor Plaintiffs from 苏源美竹木业有限责任公司 (i.e. Wellmade Floor Industries Co., Ltd.) on or around September 28 and 29, 2025.
- d. **Exhibit D.** A letter exhibiting the "chop" or "stamp" of 江苏源美竹木业有限责任公司, which shows its English name as "Wellmade Floor Industries Co., Ltd."
- e. **Exhibit E.** A document from the U.S. Citizenship and Immigration Service showing that Wellmade Floor Industries Co., Ltd. is a 100%-owned subsidiary of the Debtor.

- f. **Exhibit F.** This is a picture of a time sheet at the Georgia factory that records the time of several of the Labor Plaintiffs.

Dated: October 6, 2025

Respectfully submitted,

/s/ Aaron Halegua

Aaron Halegua*

New York Bar No. 4764163

AARON HALEGUA, PLLC

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New York, New York 10012

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*Admitted pro hac vice

/s/ Daniel Werner

Daniel Werner

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Decatur, Georgia 30030

Telephone: (678) 271-0300

John-Patrick M. Fritz

LEVENE, NEALE, BENDER, YOO &

GOLUBCHIK L.L.P.

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Los Angeles, CA 90034

Tel: (310) 229-3395

Email: jpf@lnbyg.com

*Admitted pro hac vice

*Attorneys for Creditors Yucong Liu,
Yixiang Zhang, and Cangen Han*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

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

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2025, I electronically filed the foregoing SECOND STATUS REPORT BY CREDITORS YUCONG LIU, YIXIANG ZHANG, AND CANGEN HAN'S ON DEBTORS' MOTION SEEKING ENTRY OF AN ORDER SETTING A BAR DATE FOR FILING PROOFS OF CLAIM AND OTHER RELIEF with the Clerk of Court using the CM/ECF system, which will automatically send notice of such filing to all counsel of record and parties registered to receive electronic notice in this case.

Dated: October 6, 2025

Respectfully submitted,

/s/ Aaron Halegua

Aaron Halegua*

New York Bar No. 4764163

AARON HALEGUA, PLLC

524 Broadway, 11th Floor

New York, New York 10012

Telephone: (646) 854-9061

ah@aaronhalegua.com

*Admitted pro hac vice

Exhibit A



Date: February 10, 2022

Mr. Yan, Yao

Passport Number: EC715 [REDACTED]; Date of Birth: [REDACTED] 1986
Position: Profile Engineer, Wellmade Floor Industries, Ltd. (Wellmade China)
Address: No.17 Jingshan East Road, Gaochun Economy Zone Nanjing, 211300 China
Tel: (86)25-57356000 | Fax: (86)25-57356333

Visa Section
U.S. Consulate General

Dear Visa officer,

Wellmade Floor Coverings International, Inc. (WFCI) cordially, on an urgent basis, invites Mr. Yao, Yan, Profile Engineer at Wellmade Floor Industries, Ltd. (Wellmade China) to visit Wellmade Industries MFR. N.A. LLC, a division of WFCI in February.

Mr. Yan's will inspect and instruct installation, maintenance, and modification on the profile equipment in the new factory. The profile equipment is all new state of the art machines, that need to be tested for optimal performance. It is vital to calibrate to precise measurement. He will inspect the machines from installation to testing. He will develop maintenance plans, and conduct machine safety training sessions. Mr. Yan will help Wellmade in starting up our new Georgia factory, an \$35 million manufacturing investment project with planned 240 jobs on board in Bartow County, Georgia.

WFCI, an Oregon Corporation, has provided hard surface flooring collections to customers throughout the United States since 2001. Mr. Yan's visit is integral to the success of Wellmade's "Made in the USA" initiative, also ensuring the new Cartersville 328,000 SF new factory comply with all required quality control systems, clean environment, and safety regulations.

Mr. Yan will plan to spend two weeks in the US. WFCI will pay for all travel expenses, including transportation, food and hotels, and other expenses for his visits in the United States.

www.wellmadefloors.com

phone: 866.582.0848 • fax: 503.582.8402 • 26300 SW 95th Avenue, Suite 103 • Wilsonville, Oregon, 97070



Please see web links below announcing Wellmade's new U.S. manufacturing facility recently released from Georgia Governor Brian P. Kemp's office and Floor Covering News.

<https://www.georgia.org/newsroom/press-releases/wellmade-flooring-expands-operations-georgia-invests-35-million-hartow>

<https://www.fcnews.net/2020/06/wellmade-breaks-ground-on-rigid-core-manufacturing-plant-in-georgia/>

Your favorable consideration and decision regarding Mr. Yan's visa application will be very much appreciated.

Respectfully yours,

Morgan Chen

A handwritten signature in black ink, appearing to read "Morgan Chen", written over a horizontal line.

Georgia Plant Coordinator
Wellmade Floor Coverings International, Inc.
Wellmade Industries MFR. N.A. LLC

www.wellmadefloors.com

phone: 866.582.0848 • fax: 503.582.8402 • 26300 SW 95th Avenue, Suite 103 • Wilsonville, Oregon, 97070

Exhibit B



November 18, 2024

RE: Offer of Employment

Dear Nan Liu,

Wellmade Industries MFR N.A. LLC is pleased to offer you employment on the terms and conditions described in this letter. All offers of employment are conditional and based on the candidate successfully passing background checks and validations as authorized by the incumbent and paid for by Wellmade. These are done in keeping with USA Department of Homeland Security requirements and in keeping with applicable anti workplace violence and harassment legislation.

Please carefully read and consider the terms and conditions and confirm your understanding of the agreement by countersigning this letter in the space provided below and return an original signed copy to me.

Position:

You will be employed by Wellmade Industries MFR N.A. LLC as the performing duties as **Trainer/Operator**; in addition, in those duties Wellmade Industries MFR N.A. LLC may assign you additional duties from time to time.

Start Date:

Your employment with Wellmade Industries MFR N.A. LLC will commence on **November 18, 2024**, or based on availability of candidate.

Place of Employment:

Location: You will perform your work and services for Wellmade Industries MFR N.A. LLC from our Georgia facility.

Shift:

Primary schedule is 6:45AM – 7:00PM, Monday through Friday, with a 30 min unpaid lunch. Shifts may change based on the requirements of the company.

Compensation:

- Base Salary. The Company shall pay Employee as compensation for Employee's services hereunder an annual **base salary of \$50,000.00, plus a potential bonus of up to \$10,000.00 based on achieved KPI's (TBD)**. Such a salary shall be subject to applicable tax withholding and shall be paid periodically in accordance with normal Company payroll practices.

After completing a SIX (6) months introduction period, you will become eligible for Company benefits, ONE (1) month introduction period for medical benefits.

☐ Initial here stating you have read and understood the contents of this page Nan Liu

Benefits:

PTO

Employees will be entitled to take PTO time each calendar year. You will be allotted 80 hours annually. New hires are eligible to take PTO after 6 months of employment. PTO hours accrue at 6.67 hours per month from date of hire.

Holidays

The Company also currently provides 7 paid holidays.

Business Expenses

Wellmade Industries MFR N.A. LLC will reimburse you for business expenses, consistent with Wellmade Industries MFR N.A. LLC policies, reasonably and properly incurred in connection with the performance of your duties. Receipts must accompany the request for reimbursement.

Health Care:

The Company offers medical, dental, vision, basic life insurance, voluntary life insurance, long term disability, short term disability, an accident plant, and critical illness. All are explained in the attached benefits booklet. You will become eligible for Company benefits on the 1st of the month following your first day of employment.

401K:

You will be eligible to participate in the Wellmade 401K program.

Services:

You will devote the whole of your time, attention, and ability to the business of Wellmade Industries MFR N.A. LLC and will use your best efforts to promote the interest of Wellmade Industries MFR N.A. LLC

Policies and Procedures:

You will be bound by and will faithfully observe and abide by all the policies and procedures of Wellmade Industries MFR N.A. LLC from time to time in force which are brought to your notice, of which you should reasonably be aware.

Confidential and Proprietary Information:

You acknowledge that, by reason of your employment with Wellmade Industries MFR N.A. LLC, you will have access to confidential and proprietary information, including, but not limited to trade secrets, customer lists, price lists, and other confidential and proprietary information concerning the business and affairs of Wellmade Industries MFR N.A. LLC. You agree that during and after your employment with Wellmade Industries MFR N.A. LLC, you will not use or disclose to any person (except in the proper course of your employment with Wellmade Industries MFR N.A. LLC) any such confidential and proprietary information acquired, created, or contributed to you.

☐ Initial here stating you have read and understood the contents of this page Wanli

Exhibit C

< 服务通知 🔍 ☰

查看通知详情 >

拒收该企业通知 >

星期日 20:38



企业微信



企业邀请通知

企业： 江苏源美竹木业有限责任公司

通知： 请尽快加入专用工作群，沟通工作...

查看通知详情 >

拒收该企业通知 >

昨天 20:19



企业微信



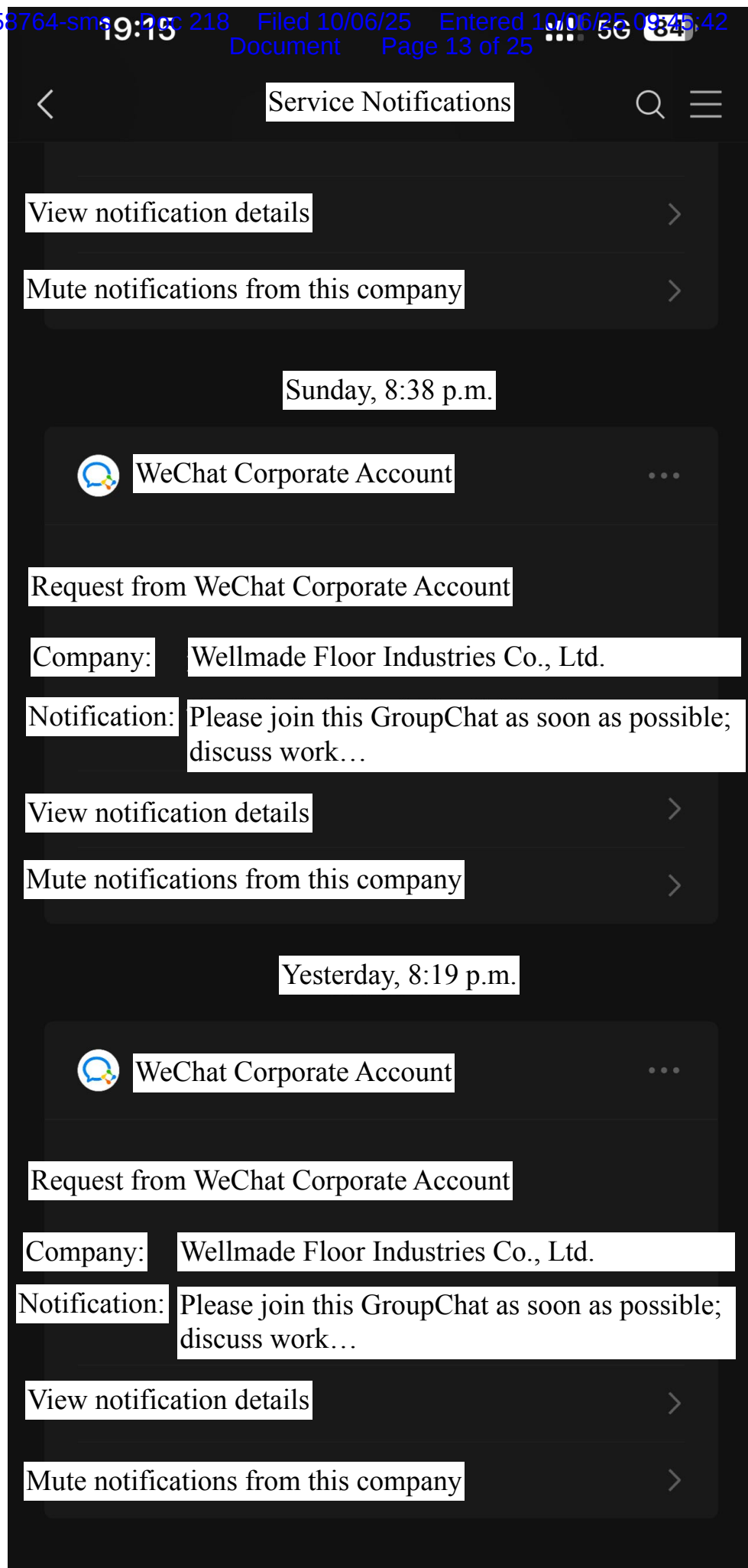
企业邀请通知

企业： 江苏源美竹木业有限责任公司

通知： 请尽快加入专用工作群，沟通工作...

查看通知详情 >

拒收该企业通知 >



CERTIFICATE OF TRANSLATION

I, Angie Liao, certify that I am fluent in Chinese and English and am competent and qualified to translate from Chinese to English and vice versa. I further certify that the attached translation is true and accurate to the best of my abilities.



Angie Liao
Aaron Halegua, PLLC
524 Broadway, Fl. 11
New York, NY 10012
Telephone: (347) 378-9803

Exhibit D



江苏源美竹木业有限责任公司

Employment Verification

Dear Sir or Madam,

This letter is to verify that Mr. Yixiang Zhang served as Slotting Machine Maintenance with our company, Wellmade Floor Industries Co., Ltd. in Nanjing, Jiangsu, China since January 2022. In this position, Mr. Zhang is responsible for the Equipment maintenance of Wellmade Floor Industries Co., Ltd. Her current salary is RMB 144,000 per year.

Please contact us if you require further information.

Sincerely Yours,

Wellmade Floor Industries Co., Ltd.

July 27, 2023



地址: 江苏省南京市高淳经济开发区荆山东路 17 号

电话: 025-57356000



Jiangsu Yuanmei Bamboo and
Wood Industry Co., Ltd.

Employment Verification

Dear Sir or Madam,

This letter is to verify that Mr. Yixiang Zhang served as Slotting Machine Maintenance with our company, Wellmade Floor Industries Co., Ltd. in Nanjing, Jiangsu, China since January 2022. In this position, Mr. Zhang is responsible for the Equipment maintenance of Wellmade Floor Industries Co., Ltd. Her current salary is RMB 144,000 per year.

Please contact us if you require further information.

Sincerely Yours,

Wellmade Floor Industries Co., Ltd.

July 27, 2023



CERTIFICATE OF TRANSLATION

I, Angie Liao, certify that I am fluent in Chinese and English and am competent and qualified to translate from Chinese to English and vice versa. I further certify that the attached translation is true and accurate to the best of my abilities.



Angie Liao
Aaron Halegua, PLLC
524 Broadway, Fl. 11
New York, NY 10012
Telephone: (347) 378-9803

Exhibit E

THE UNITED STATES OF AMERICA

I-129 L Supplement Addendum
LIST OF SELECTED SUBSIDIARIES DIRECTLY OR INDIRECTLY OWNED AND CONTROLLED BY
WELLMADE FLOOR COVERINGS INTERNATIONAL INC.
AND AFFILIATED WITH WELLMADE FLOOR COVERINGS INTERNATIONAL INC.

(As of October 1, 2020)

U.S. Petitioner:

Wellmade Floor Coverings International, Inc.
26100 SW 95th Ave, Suite 205
Wilsonville, OR 97070

U.S. Petitioner's Subsidiaries, Affiliates, and Branch Offices

Name of Company		Location (Country and address)		Percentage of Ownership by U.S. Petitioner
1	Wellmade Floor Industries Co., Ltd. ("WF Industries")	China	No. 17 Jingshan East Road, Gaochun Economy Develop Zone, Nanjing, Jiangsu 211316	Subsidiary 100% Owned and Controlled by the U.S. Petitioner
2	Globalone Supply, LLC ("Globalone Supply")	USA	26100 SW 95th Ave., Suite 205, Wilsonville, OR 97070	Subsidiary 100% Owned and Controlled by the U.S. Petitioner
3	Wellmade Industries MFR. N.A LLC ("Wellmade MFR")	USA	51 Busch Dr NE, Cartersville, GA 30121	Subsidiary 100% Owned and Controlled by the U.S. Petitioner

Exhibit F



江苏源美竹木业有限责任公司考勤表

部门: 美国工厂 2023 年 4 月

姓名	班次	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	本月出勤	签字确认
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刘永庆	白																																
	夜																																
严通	白																																
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刘育超	白																																
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孙海博	白																																
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高艳喜	白																																
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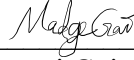
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部门负责人签字:

高艳喜
崔本平
乔增光

Wellmade PERFORMANCE FLOORING																																		
Wellmade Floor Industries Co., Ltd. Attendance Sheet																																		
																														Department: American Factory				
																														Date: April 2023				
Name	Shift	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Total Attendance	Signature	
刘永庆 Liu Yongqing	Day	√	√							√	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽								√	26 Days	
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严遥 Yan Yao	Day	√	√										Forgot to clock in																				26 Days	
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刘育聪 Liu Yucong	Day	√	√	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	√	▽	26 Days	
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孙海涛 Sun Haitao	Day	√	√	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	√	√	27 Days	
	Night																																	
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石红星 Shi Hongxing	Day	√	√	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	▽	√	√	√	√	√	√	√	▽	26 Days	Shi Hongxing
	Night																																	
崔本平 Cui Benping	Day	√	√							▽							▽					√	√	√	▽	√	√	√	√	√	√	√	26 Days	Cui Benping
	Night			√	√	√	√	√	√		√	√	√	√	√	√		√	√	Shift														
乔增光 Qiao Zengguang	Day	√	√	√	√	√	√	▽	▽	▽	▽	▽	▽	▽	▽	▽	▽	▽	√	√	▽	▽	▽	▽	√	√	√	√	√	√	√	√	15 Days	
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Symbol Description: Attendance √ (Enter according to actual working hours, for example, 9 hours, enter 9), Day off (▽), Business Trip (▲), Personal Leave (△), Sick Leave (■), Marriage Leave (·), Maternity Leave (○), Bereavement Leave (●), Absent (O)																																		
Department Head Signature:																																		

CERTIFICATE OF TRANSLATION

I, Mengwei Gai, hereby certify that I am fluent in Chinese and English and am competent and qualified to translate from Chinese to English and vice versa. I further certify that the attached translation is a true and accurate to the best of my abilities



Mengwei Gai
Date: 10/06/2025
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Saipan MP 96950
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Email: gmarch1016@gmail.com