

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

DECLARATION OF DISINTERESTEDNESS

I, Stephen K. Gallagher, declare under penalty of perjury:

1. I am a Partner of Venable LLP. My office is located at 1850 Towers Crescent Plaza, Suite 400, Tysons, Virginia 22182 (the “Firm”).

1. Wellmade Floor Coverings International, Inc., and certain of its affiliates, as debtors and debtors in possession (collectively, the “Debtors”), have requested that the Firm provide legal advice and services with respect to Intellectual Property matters, including, for example, patent and trademark matters to the Debtors, and the Firm has consented to provide such services.

2. The Firm may have performed services in the past, may currently perform services and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors’ chapter 11 cases. Based upon a search of its conflicts database, the Firm does not perform services for any such person in connection with these chapter 11 cases, or have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

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.



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3. As part of its customary practice, the Firm is retained in cases, proceedings , and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

4. Neither I nor any principal, partner, director, officer, etc. of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

5. Neither I nor any principal, partner, director, officer, etc. of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which this Firm is to be employed.

6. The Debtors owe the Firm \$73,208.39 for prepetition services, the payment of which is subject to limitations contained in the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.* The Firm reserves the right to amend this amount and any proof of claim it files.

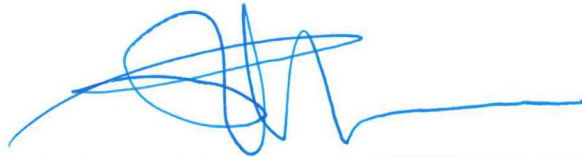
7. The Firm understands that it must file a proof of claim for such fees and expenses unless the amount thereof is properly listed on the Debtors' schedules of liabilities and is not designated therein as contingent, unliquidated, or disputed.

8. As of the Petition Date, and insofar as I have been able to ascertain, the Firm was not party to an agreement for indemnification with the Debtors.

9. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 10, 2025



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