

**IN THE 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

(Jointly Administered)

**EMERGENCY MOTION OF THE LABOR PLAINTIFFS  
FOR ENTRY OF AN ORDER SHORTENING NOTICE AND SCHEDULING  
EXPEDITED HEARING ON LABOR PLAINTIFFS' MOTION FOR A  
RULE 2004 EXAMINATION AND PRODUCTION OF DOCUMENTS  
BY DEBTORS AND ALLEN CHEN**

COME NOW Creditors Yucong Liu, Cangen Han, Yixiang Zhang, and others (together, the “Labor Plaintiffs”),<sup>2</sup> by and through the undersigned counsel, submit this *Emergency Motion of the Labor Plaintiffs for Entry of an Order Shortening Notice and Scheduling Expedited Hearing on Labor Plaintiffs' Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen*, requesting entry of an Order substantially in the form attached hereto as **EXHIBIT A** (the “Proposed Order”) pursuant to section 105 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rule 9006-2 of the Bankruptcy Court Rules for the Northern

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<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.

<sup>2</sup> The full list of Labor Plaintiffs includes: Yucong Liu, Cangen Han, Yixiang Zhang, Nan Liu, Shuai Zhang, Yao Yan, Haitao Sun, Jiansheng Yin, Shengxiang Yu, Wen Chen, Shengda Yu, Shun Yu, Shunkui Wang, Jinchao Si, Jiagen Yang, Marianela Pina Yaguari, Yorman Ojeda Herrera, and Eglis Almarza Diaz.



District of Georgia (the “Local Rules”), (i) shortening the applicable notice period for the *Labor Plaintiffs’ Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* (the “Rule 2004 Motion”);<sup>3</sup> (ii) setting the deadline to file objections to the *Rule 2004 Motion* as **November 4, 2025 at 1:00 p.m. (prevailing Eastern Time)**, and (iii) scheduling the hearing on the Rule 2004 Motion for **November 5, 2025 at 10:15 a.m. (prevailing Eastern Time)** (the “Hearing”), or at such other date and time that this Court is available.

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. § 1408.

### **BACKGROUND**

2. The Labor Plaintiffs hereby incorporate their prior pleadings in this matter, including ECF Nos. 171, 213, 218, and 242.

3. The Labor Plaintiffs hereby incorporate by reference the Rule 2004 Motion that was filed herewith.

4. Notably, Labor Plaintiffs tried informally to obtain much of the information that is sought through the Rule 2004 Motion for months, but have been unsuccessful.

5. The bar date for filing proofs of claim and other related relief has been set for November 21, 2025. (ECF No. 222 (the “Bar Date Order”).

### **RELIEF REQUESTED**

6. By this Emergency Motion, the Labor Plaintiffs seek entry of a proposed order, substantially in the form attached hereto as **EXHIBIT A**, (i) shortening the applicable notice period for the Rule 2004 Motion, (ii) setting the deadline to file objections to the Rule 2004 Motion to

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<sup>3</sup> The defined terms herein have the same meaning as in the Rule 2004 Motion, unless otherwise stated.

November 4, 2025 at 1:00 p.m. (EST), and (iii) if necessary, scheduling a hearing on the Rule 2004 Motion for November 5, 2025 at 10:15 a.m. (EST), or such other date and time that this Court is available.

### **BASIS FOR RELIEF**

7. Section 102(1) of the Bankruptcy Code provides that the phrase “after notice and a hearing” requires only such notice and opportunity for a hearing as may be appropriate under the circumstances. 11 U.S.C. § 102(1). Further, section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a). Moreover, “[t]he basic purpose of section 105 is to assure the bankruptcy courts power to take whatever action is appropriate or necessary in aid of the exercise of their jurisdiction.” 2 COLLIER ON BANKRUPTCY ¶ 105.01 (16th ed. 2025).

8. Under Bankruptcy Rule 9006(c)(1), the Court may order time periods set by the Bankruptcy Rules to be reduced “for cause.” Fed. R. Bank. P. 9006(c)(1). More specifically, “[w]hen a rule, notice given under a rule, or court order requires or allows an act to be done within a specified time, the court may—for cause and with or without a motion or notice—reduce the time.” *Id.* Moreover, Local Rule 9006-2 permits shortened notice and hearing with regard to a matter requiring immediate attention or a matter requiring expedited consideration upon written motion and for good cause shown. *See* BLR 9006-2.

9. The Bar Date Order in this matter, which was primarily drafted by Debtors, requires that each proof of claim “must ... include a claim amount denominated in United States dollars, .... be signed under penalty of perjury, ... [and] include supporting documentation.” (ECF No. 222 ¶ 11) (emphasis added).

10. Expediting the hearing on the Rule 2004 Motion will allow the Labor Plaintiffs to obtain, in advance of the November 21, 2025 bar date, information that is essential to filing a proof of claim that complies with the specifications of the Bar Date Order. For instance, there are many documents and much information that is only in possession of the Debtors and Allen Chen, such as time sheets, wage payment records, contracts and invoices regarding the staffing agencies, records of the profits of the Debtors that are eligible for disgorgement, and other items set forth in the Rule 2004 Motion. Similarly, the Labor Plaintiffs require information to file their class proof of claim that is only in the possession of Debtors and Allen Chen, such as the total number of Visa Workers that were employed at the Cartersville Facility. If Labor Plaintiffs are not able to obtain this information, they may be subjected to a variety of objections relating to their proofs of claim.

11. Labor Plaintiffs do not believe that any party-in-interest will be unfairly prejudiced by the shortening of the notice period with respect to the Rule 2004 Motion. Debtors requested that parties incorporate into their proofs of claim the type of information that the Labor Plaintiffs now seek. Debtors and Allen Chen have now had written notice of the relief sought by the Labor Plaintiffs since October 26, 2025, and have already performed the legal research to find authorities which they argue support their position.

12. Accordingly, for the reasons set forth herein, the Labor Plaintiffs submit that good and sufficient cause exists to shorten the notice period with respect to the Rule 2004 Motion so that it can be heard, considered, and ruled upon in the manner proposed in this Emergency Motion.

### **NOTICE**

13. In addition to filing this Emergency Motion via ECF, notice of this Emergency Motion has been given via electronic mail to the following parties or, in lieu thereof, to their counsel: (a) the Office of the U.S. Trustee for the Northern District of Georgia; (b) the Committee;

(c) Debtors; and (d) Allen Chen. The Labor Plaintiffs submit that, in light of the nature of the relief requested, no other or further notice need be given.

**NO PRIOR REQUEST**

14. No previous request for the relief sought herein has been made by the Labor Plaintiffs to this Court or any other court.

**CONCLUSION**

15. WHEREFORE, the Labor Plaintiffs respectfully request that this Court enter the Proposed Order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and such other and further relief as is just and proper.

Respectfully submitted this day: October 31, 2025.

/s/ Aaron Halegua

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*Counsel for the Labor Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that all ECF participants registered in this case were served electronically with the foregoing Motion through the Court's ECF system at their respective email addresses registered with this Court. In addition, the U.S. Trustee, Committee, Debtors, and Allen Chen were provided notice via electronic mail.

Dated: October 31, 2025  
New York, New York

/s/ Aaron Halegua  
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**EXHIBIT A**  
**(PROPOSED ORDER)**



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

In re:

WELLMADE FLOOR COVERINGS  
INTERNATIONAL, INC., *et al.*,<sup>4</sup>

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**ORDER SHORTENING NOTICE AND SCHEDULING EXPEDITED  
HEARING ON LABOR PLAINTIFFS' MOTION FOR RULE 2004  
EXAMINATION AND PRODUCTION OF  
DOCUMENTS BY DEBTORS AND ALLEN CHEN**

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<sup>4</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.

Upon the *Emergency Motion of the Labor Plaintiffs for Entry of an Order Shortening Notice and Scheduling Expedited Hearing on Labor Plaintiffs' Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen*; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; 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 Emergency Motion has been given under the circumstances; and 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 as set forth herein.
2. A hearing (the "Hearing") shall be held on the *Labor Plaintiffs' Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* (the "Rule 2004 Motion") on November 5, 2025 at 10:15 a.m. (EST) in the Bankruptcy Court, Richard B. Russell Federal Building and United States Courthouse 75 Ted Turner Drive, SW Atlanta, Georgia. Parties and counsel shall be permitted to appear virtually for this hearing.
3. Any party objecting to the relief requested in the Rule 2004 Motion must file an objection with the Court by 1:00 p.m. (prevailing Eastern Time) on November 4, 2025 (the "Objection Deadline") and serve such objection on counsel to the Labor Plaintiffs and any other requisite parties by the Objection Deadline.
4. As soon as reasonably practicable after entry of this Order, the Labor Plaintiffs shall file and serve the Notice of Hearing attached hereto as **Exhibit 1** (the "Notice of Haring") via electronic mail on (a) the Office of the U.S. Trustee for the Northern District of Georgia; (b) the Debtors; (c) counsel for the Committee; and (d) Allen Chen.

5. The Labor Plaintiffs' proposed Notice of Hearing is hereby approved as good and sufficient notice of the hearing on the Rule 2004 Motion.

6. The Labor Plaintiffs are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.

END OF DOCUMENT

Prepared and presented by:

/s/ Aaron Halegua

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*Counsel for the Labor Plaintiffs*

**EXHIBIT 1**

**(NOTICE OF HEARING)**

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

In re:

WELLMADE FLOOR COVERINGS  
INTERNATIONAL, INC., *et al.*,<sup>5</sup>

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that on October 31, 2025, the **Labor Plaintiffs** filed the *Emergency Motion of the Labor Plaintiffs for Entry of an Order Shortening Notice and Scheduling Expedited Hearing on Labor Plaintiffs' Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* (the "Emergency Motion") with the Court.

**PLEASE TAKE FURTHER NOTICE** that, on October \_\_, 2025, the Court entered an order granting the Emergency Motion and scheduled an expedited hearing for the *Labor Plaintiffs' Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* (the "Rule 2004 Motion").

**PLEASE TAKE FURTHER NOTICE** that the Court shall hold a hearing (the "Hearing") on the Rule 2004 Motion on November 5, 2025 at 10:15 a.m. (EST) in the Bankruptcy Court, Richard B. Russell Federal Building and United States Courthouse 75 Ted Turner Drive, SW Atlanta, Georgia, which must be attended in person, unless the Court orders otherwise.

**PLEASE TAKE FURTHER NOTICE** that any objection to the Rule 2004 Motion must be submitted in writing to the Court by 1:00 p.m. (EST) on November 4, 2025 (the "Objection Deadline") and such objection shall be served on counsel to the Labor Plaintiffs.

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file

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<sup>5</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.

a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk by the deadline. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Dated: October 31, 2025

Respectfully submitted,

/s/ Aaron Halegua

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