

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)

**NOTICE OF HEARING ON DEBTORS' MOTION
FOR ENTRY OF ORDER EXTENDING EXCLUSIVE PERIODS TO
FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

PLEASE TAKE NOTICE that, on November 18, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed a *Motion for Entry of Order Extending Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* (the "Motion").

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion at **1:30 p.m. (prevailing Eastern Time) on December 2, 2025 in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-In and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

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 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 before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted

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.



Turner Drive, SW, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Date: November 18, 2025
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Allison J. McGregor

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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,²

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**DEBTORS' MOTION FOR ENTRY OF ORDER EXTENDING EXCLUSIVE
PERIODS TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), submit this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), pursuant to section 1121(d) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) and Rule 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), extending by 90 days (a) the period which the Debtors have the exclusive right to file a chapter 11 plan, through and including March 2, 2026 (the “Exclusive Filing Period”), and (b) the period during which the Debtors have the exclusive right to solicit votes on a chapter 11 plan, through and including May 1, 2026 (the “Exclusive Solicitation Period” and, together with the Exclusive Filing Period, the “Exclusive Periods”), without prejudice to the Debtors’ right to seek further extensions of the Exclusive Periods.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the

² 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.

“Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are section 1121(d) of the Bankruptcy Code and Bankruptcy Rule 9014.

BACKGROUND

I. General Background

3. On August 4, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On August 14, 2025, the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”).

6. No request has been made for the appointment of a trustee or an examiner.

7. Additional information regarding the Debtors’ businesses, capital structure, and the circumstances leading to the filing of these Chapter 11 Cases is set forth in the First Day Declaration [D.I. 14], which is fully incorporated herein by reference.

II. The Sale Process

8. On August 8, 2025, the Debtors filed the *Motion of the Debtors for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of the Debtors’ Assets, (B) Approving the Debtors’ Entry into the Stalking Horse Purchase Agreement and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory*

Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief; and (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 38] (the "Bidding Procedures and Sale Motion").

9. On August 25, 2025 the Court entered the *Order (A) Establishing Bidding Procedures Relating to the Sale of the Debtors' Assets, (B) Approving the Debtors' Entry into the Stalking Horse Purchase Agreement and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief [D.I. 99] (the "Bidding Procedures Order")*, which, among other things, set the bid deadline for September 19, 2025 and scheduled the auction for September 23, 2025.

10. Following the entry of the Bidding Procedures Order, the Debtors and the Stalking Horse Bidder, AHF IC, LLC, continued negotiations regarding the terms of a private sale. As a result of those negotiations, an agreement was reached regarding the terms of a private sale, the Auction was cancelled, and the Debtors stopped soliciting bids for their assets (whether in connection with the Bid Deadline of September 19, 2025 or otherwise).

11. On September 26, 2025, the Debtors filed the *Motion of the Debtors for Entry of an Order (A) Approving the Private Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 194] (the*

“Private Sale Motion”).

12. On October 8, 2025, the Court entered the *Order (A) Approving the Private Sale of the Debtors’ Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief* [D.I. 220] (the “Sale Order”).

13. The sale closed on November 7, 2025 and on November 12, 2025, the Debtors filed the *Notice of Closing of Sale of Debtors’ Assets and Repayment of DIP Obligations* [D.I. 259] (the “Notice of Closing”).

III. Other Pending Matters in these Chapter 11 Cases

14. Since the Petition Date, the Debtors have worked diligently on a number of critical matters but have not yet consummated a plan nor solicited acceptances thereof. Among other things, the Debtors and their professionals have been focused on: (i) obtaining “first day” relief that has enabled the Debtors to smooth, as much as possible under the circumstances, their entry into chapter 11; (ii) negotiating and finalizing the postpetition financing necessary to maintain the Debtors’ operations during the chapter 11 proceedings; (iii) seeking approval of the sale of substantially all of their assets and focusing on the closing of the sale; (iv) responding to various motions and objections filed by creditors that, prior to Bankruptcy Cases, had initiated a class action law suit in the District Court for the Northern District of Georgia;³ and (v) addressing numerous questions, concerns and issues raised by employees, vendors, customers and other parties in interest.

³ The Debtors were parties to various pre-petition civil actions commenced in various forums (the “Prepetition Actions”). See *First Amended Statement of Financial Affairs for Wellmade Industries MFR. N.A. LLC* (Case No. 25-58760), Case No. 25-58760 (SMS), D.I. 19, Exhibit C; *First Amended Statement of Financial Affairs for Wellmade Floor Coverings International, Inc.* (Case No. 25-58764), Case No. 25-58764 (SMS), D.I. 185, Exhibit C.

15. Over the course of the exclusivity period, the Debtors have been working diligently to resolve claims against the estate. On September 4, 2025, the Debtors filed the *Debtors Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claims; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [D.I. 137] (the “Bar Date Motion”).

16. Objections to the Bar Date Motion were filed by the Committee [D.I. 169] and by creditors Yucong Liu, Yixiang Zhang, and Cangen Han (collectively, the “Labor Plaintiffs”) [D.I. 197] and after two hearings on the Bar Date Motion, on October 9, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proof of Claims; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [D.I. 222] (the “Bar Date Order”), designating November 21, 2025 as the date by which all entities and individuals (except governmental units) are required to file proofs of claim in the Chapter 11 Cases.

17. At a September 5, 2025 hearing on the *Labor Plaintiffs’ Motion for Rule 2004 Examination and Production of Documents by Debtors and Allen Chen* [D.I. 244], the Court ordered the Debtors and the Labor Plaintiffs to attend mediation which is set to occur at the beginning of new year.

18. The Debtors believe that having the time to review all the proofs of claims following the Bar Date will better position the Debtors to file a confirmable plan of liquidation.

19. Accordingly, for the reasons discussed herein, the Debtors seek an extension of the Exclusive Periods to allow the Debtors additional time to proceed with the Chapter 11 Cases,

including soliciting, confirming and consummating a Plan.

RELIEF REQUESTED

20. The Debtors respectfully request entry of the Proposed Order (i) extending the current Exclusive Periods by 90 days through and including March 2, 2026 to file the Plan and May 1, 2026 to solicit acceptances to the Plan; and (ii) granting related relief. The Debtors also request that this Motion be considered without prejudice to their rights to seek further extensions of the Exclusive Periods.

BASIS FOR RELIEF

21. Section 1121(b) of the Bankruptcy Code gives a debtor the exclusive right to propose a chapter 11 plan for the first 120 days of a chapter 11 case. *See* 11 U.S.C. § 1121(b). Section 1121(c)(3) of the Bankruptcy Code provides that if a debtor files a plan within the Exclusive Filing Period, it has the first 180 days of the chapter 11 case to obtain acceptance of such a plan. *See* 11 U.S.C. § 1121(c)(3). Section 1121(d) of the Bankruptcy Code permits the Bankruptcy Court to extend the Exclusive Periods for “cause.” *See* 11 U.S.C. § 1121(d). For the reasons set forth herein, the Debtors believe that such “cause” exists to extend the Exclusive Periods by 90 days each.

I. Bankruptcy Code § 1121(d) Permits the Court to Extend the Exclusive Periods for “Cause.”

22. The plan exclusivity periods are designed to “promote an environment in which the debtor’s business may be rehabilitated and consensual plans may be negotiated.” *In re Burns & Roe Enters., Inc.*, 2005 U.S. Dist. LEXIS 26247 (D.N.J. Nov. 2, 2005) (quoting H.R. Rep. No. 103-835, at 36 (1994)). The decision to extend a debtor’s exclusivity periods is fact-specific and within the discretion of the Bankruptcy Court. *See In re Whigham*, 2012 Bankr. LEXIS 4108 (Bankr. S.D. Ga. Sept. 6, 2012); *In re Sportsman’s Link, Inc.*, 2007 Bankr. LEXIS 4739, at *2

(Bankr. S.D. Ga. Dec. 3, 2007); *In re R.G. Pharmacy Inc.*, 347 B.R. 484, 487 (Bankr. D. Conn. 2007).

23. To determine whether “cause” exists to grant an extension of the Exclusive Periods, courts analyze the following factors:

- (a) the size and complexity of the case;
- (b) the necessity of sufficient time to negotiate a plan and prepare adequate information;
- (c) the existence of good faith progress towards reorganization;
- (d) whether the debtor is paying its debts as they come due;
- (e) whether the debtor has demonstrated reasonable prospects for filing a viable plan;
- (f) whether the debtor has made progress in negotiating with creditors;
- (g) the length of time the case has been pending;
- (h) whether the debtor is seeking an extension to pressure creditors; and
- (i) whether unresolved contingencies exist.

See, e.g., Whigham, 2012 Bankr. LEXIS 4108 at *5 (Bankr. S.D. Ga. Sept. 6, 2012); *Sportsman’s Link*, 2007 Bankr. LEXIS 4739, at *2 (Bankr. S.D. Ga. Dec. 3, 2007); *In re Friedman’s, Inc.*, 336 B.R. 884, 888 (Bankr. S.D. Ga. 2005); *In re Adelphia Commc’ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006).

24. Not all factors are relevant to every case, and the existence of even one of the above-listed factors may be sufficient to extend the exclusivity periods. *See, e.g., In re Hoffinger Indus., Inc.*, 292 B.R. 639, 644 (B.A.P. 8th Cir. 2003) (“It is within the discretion of the bankruptcy court to decide which factors are relevant and give the appropriate weight to each.”); *In re Serv. Merch. Co., Inc.*, 256 B.R. 744, 751–54 (Bankr. M.D. Tenn. 2000) (finding cause to extend where the

debtors established six of the aforementioned factors); *Express One*, 194 B.R. at 101 (Bankr. E.D. Tex. 1996) (identifying four of the factors as relevant in determining whether cause existed to extend exclusivity). The Debtors respectfully submit that, as detailed below, consideration of the relevant factors supports the requested extensions of the Exclusive Periods.

25. Moreover, courts regularly grant a debtor's first request for an extension of the debtor's exclusive period to file a chapter 11 plan. *See In re Apex Pharm., Inc.*, 203 B.R. 432, 441 (N.D. Ind. 1996) ("It is true that during the initial 120-day period in which debtors have an exclusive right to file a plan of reorganization . . . the bankruptcy courts apply a lesser standard in determining whether the burden of showing 'a reasonable possibility of a successful reorganization within a reasonable time' has been satisfied.") (internal citations omitted); *see also In re Borders Grp., Inc.*, 460 B.R. 818, 825 (Bankr. S.D.N.Y. 2011) (same).

26. Courts in this district have granted similar relief to that requested herein in a number of cases. *See, e.g., In re AFH Air Pros, LLC, et al.*, Case No. 25-10356 (Bankr. N.D. Ga., May 30, 2025 (PMB) [D.I. 300] (granting 90-day extension); *In re Lavie Care Centers, LLC*, Case No. 24-55507 (Bankr. N.D. Ga. Oct. 22, 2024) (PMB) [D.I. 573] (granting 90-day extension); *In re Regional Housing & Community Services Corp.*, Case No. 21-41034 (Bankr. N.D. Ga. Dec. 16, 2021) (PWB) [D.I. 101] (granting 120-day extension); *In re P-D Valmiera Glass USA Corp.*, Case No. 19-59440 (Bankr. N.D. Ga. Oct. 10, 2019) (PWB) [D.I. 216] (granting 90-day extension); *In re Southern Regional Health System, Inc. d/b/a Southern Regional Medical Center*, Case No. 15-64266 (Bankr. N.D. Ga. Nov. 6, 2015) (WLH) [D.I. 386] (granting 180-day extension).

27. Accordingly, for the reasons set forth herein, the Debtors believe that such "cause" exists to extend the Exclusive Periods by 90 days each.

II. Good Cause Exists to Extend the Exclusive Periods.

28. This is the Debtors' first request for an extension of its Exclusive Periods. The Debtors submit that the factors discussed below weigh in favor of such extension.

A. The Chapter 11 Cases are Complex, and Less Than Four Months Have Elapsed Since the Cases were Filed.

29. The Chapter 11 Cases are sufficiently complex to warrant the requested extension of the Exclusive Periods. There are currently three Prepetition Actions pending against the Debtors, one of which is a class action suit that the Debtors are attempting to resolve through mediation. The Bar Date Deadline has yet to pass to allow the Debtors to review and potentially object to proofs of claims filed in the Chapter 11 Cases case. In the meantime, the Debtors have negotiated and consummated a private sale of substantially all of their assets, responded to formal and informal information requests from various parties, and negotiated and finalized the postpetition financing necessary to maintain operations during the Chapter 11 Cases.

30. The Debtors have had just over three months to progress the Chapter 11 Cases, which is insufficient time to resolve cases involving contentious and unresolved litigation, especially a class action suit. Thus, the Debtors submit that the complexity of the Chapter 11 Cases and the limited length of time the Cases have been pending weigh in favor of granting the requested extension of the Exclusive Periods.

B. The Debtors Have Made Good Faith Progress Toward Reorganization.

31. Since the Petition Date, the Debtors have made significant and material progress toward advancing the Chapter 11 Cases, including the following:

- (a) **Obtaining First Day Relief.** Upon entering chapter 11, the Debtors immediately sought to stabilize their operations through various operational

first day motions and orders. Such relief allowed the Debtors to, among other things, maintain operations, continue to use their existing cash management system, and pay certain prepetition obligations in the ordinary course.

- (b) **Obtaining Debtor-in-Possession Financing.** Following extensive negotiations with their lenders and the Committee, the Court entered a final order approving, among other things, the Debtors' post-petition financing, which provided critical financing and access to cash collateral to finance the Debtors' operations throughout the Chapter 11 Cases.
- (c) **Filing Schedules and Statements.** The Debtors filed their schedules and statements after compiling information from books, records, and other documents relating to claims, assets, and contracts of each Debtor.
- (d) **Private Asset Sale.** Following entry of the Bidding Procedures Order, the Debtors and the Stalking Horse Bidder, AHF IC, LLC, continued negotiations regarding the terms of a private sale. As a result of those negotiations, an agreement was reached regarding the terms of a private sale, which was subsequently approved by the Court, and closed on November 7, 2025.

32. In sum, the good faith efforts and progress exhibited by the Debtors in the Chapter 11 Cases support an extension of the Exclusive Periods.

C. Additional Time is Necessary to Negotiate and Prepare Adequate Information to Allow Creditors to Determine Whether to Accept the Plan.

33. Since the Petition Date, the Debtors and their professionals have focused much of their time, energy, and resources on administering the Chapter 11 Cases in the ordinary course of

business, finalizing a private sale of substantially all the Debtors' assets, and negotiating with vendors and other creditors, including the Committee and other creditors. Extension of the Exclusive Periods will ensure that the Debtors have a full and fair opportunity to propose the Disclosure Statement and Plan as necessary without the distraction, cost, and delay of a competing plan process. Now that the Debtors have sold substantially all of their assets and are winding down, the Debtors require additional time to complete remaining inventory liquidations and to engage in discussions with key stakeholders before filing and prosecuting a plan of liquidation. *See In re Energy Conversion Devices, Inc.*, 474 B.R. 503, 507 (Bankr. E.D. Mich. 2012) ("In enacting section 1121, Congress intended to allow the debtor a reasonable time to obtain confirmation of a plan without the threat of a competing plan. It was intended that ... a debtor should be given the opportunity to negotiate a settlement and propose a plan of reorganization without interference from creditors and other interests.") (internal quotation and citation omitted). Accordingly, the Debtors submit that this factor weighs in favor of extending the Exclusive Periods.

D. The Debtors Have Paid Their Debts in the Ordinary Course as They Came Due.

34. The Debtors have made and will continue to make timely payments on their undisputed post-petition obligations in the ordinary course, meaning that the requested extension of the Exclusive Periods will not prejudice the legitimate interests of post-petition creditors. As such, this factor also weighs in favor of extending the Exclusive Periods.

E. The Debtors are Not Seeking an Extension to Pressure Creditors.

35. Granting the requested extensions of the Exclusive Periods will not pressure the Debtors' creditor constituencies or grant the Debtors any unfair bargaining leverage. The Debtors have no ulterior motive in seeking an extension of the Exclusive Periods. To the contrary, the

Debtors have been in regular communications with the Committee, the Prepetition Lender, the DIP Lender, and other creditors, on numerous issues facing their estates. The Debtors are not seeking an extension to pressure their creditors to take any action, but only to ensure that the Debtors can pursue the resolution of the Chapter 11 Cases, including by proposing, confirming, and consummating a Disclosure Statement and Plan, free from distraction or competing plan proposals. Therefore, this factor also weighs in favor of extending the Exclusive Periods.

F. The Debtors Have Reasonable Prospects for Filing a Viable Plan

36. The money received from the private sale will almost certainly be sufficient to pay off all the Debtors' creditors' known claims, a fact acknowledged by the Labor Plaintiffs' counsel. Thus, the Debtors believe that they have reasonable prospects for proposing, confirming, and consummating a Disclosure Statement and Plan. Accordingly, the Debtors believe that this factor weighs in favor of extending the Exclusive Periods.

G. The Debtors Face Unresolved Contingencies.

37. The Debtors currently face several Prepetition Actions, including a civil class action suit alleging labor violations filed by the Labor Plaintiffs. The existence of such unresolved contingencies weighs in favor of granting the requested extension of the Exclusive Periods. Further, the Debtors will use any extension of the exclusivity period to continue to negotiate with all interested parties to develop, file and solicit a final plan in order to reach resolution of these Chapter 11 Cases.

H. Termination of the Debtors' Exclusive Periods Would Adversely Impact the Chapter 11 Cases.

38. Termination of the Exclusive Periods, particularly at this stage of the Chapter 11 Cases, would adversely impact the Debtors' efforts to preserve and maximize the value of their estates and would further complicate the progression of the Chapter 11 Cases. Such termination

may disincentivize creditors from negotiating with the Debtors. Moreover, the proposal and solicitation of any competing plan would greatly complicate and increase the cost of administering the Chapter 11 Cases, further justifying the requested extension of the Exclusive Periods.

39. Based upon the foregoing, the Debtors respectfully submit that cause exists in the Chapter 11 Cases to extend the Exclusive Periods as requested herein.

NOTICE

40. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee for the Northern District of Georgia; (b) holders of the thirty (30) largest unsecured claims against the Debtors on a consolidated basis; (c) counsel to the Committee; (d) counsel to the Prepetition Lender and Buyer; (e) counsel to the Debtors' postpetition secured lender (the "DIP Lender"); (f) the Internal Revenue Service; (g) the Office of the United States Attorney for the Northern District of Georgia; (h) the states attorneys general for states in which the Debtors conduct business; (i) Georgia Department of Revenue; and (j) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

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

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order

granting the relief requested herein and such other and further relief as is just and proper.

Dated: November 18, 2025
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Allison J. McGregor

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Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2025, 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. The Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC d/b/a Verita Global, will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Motion, including on the Limited Service List.

Dated: November 18, 2025
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Allison J. McGregor

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Counsel for the Debtors and Debtors in Possession

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.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

Re Docket No. ____

**ORDER EXTENDING EXCLUSIVE PERIODS
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

Upon the *Motion for Entry of Order Extending Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* (the “Motion”);² and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding pursuant to 28

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² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

U.S.C. § 157(b); 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 due and sufficient notice of the Motion and the hearing on the Motion schedule for December 2, 2025 having been given under the particular circumstances; and it appearing that no further notice or hearing is required; and it appearing that the relief requested in the Motion is in the best interest of the Debtors, their estates, their creditors, and other parties in interest; and it appearing that good cause exists to grant the relief requested in the Motion; and the Court having considered the Motion and all other matters of record, including the lack of objection thereto,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The Exclusive Filing Period is extended through and including March 2, 2026.
3. The Exclusive Solicitation Period is extended through and including May 1, 2026.
4. The entry of this Order is without prejudice to the Debtors' right to request further extensions of the Exclusive Periods.
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Debtors 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:

GREENBERG TRAURIG, LLP

/s/ Allison J. McGregor

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