

**Fill in this information to identify the case:**Debtor Wellmade Floor Coverings International, Inc.United States Bankruptcy Court for the: Northern District of Georgia  
(State)Case number 25-58764**Modified Official Form 410  
Proof of Claim****04/25**

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

**Part 1: Identify the Claim**

1. Who is the current creditor?	<u>Aaron Halegua, PLLC</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b> <u>Aaron Halegua, PLLC</u> <u>524 Broadway, 11th Floor</u> <u>New York, NY 10012</u>  Contact phone _____ Contact email <u>ah@aaronhalegua.com</u>  Uniform claim identifier (if you use one): _____	<b>Where should payments to the creditor be sent? (if different)</b>  Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

<b>6. Do you have any number you use to identify the debtor?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:   __ __ __ __
<b>7. How much is the claim?</b> \$ <u>664,000</u> or more	<b>Does this amount include interest or other charges?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
<b>8. What is the basis of the claim?</b>	<p>Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.</p> <p><u>Statutory fee-shifting, as set forth in Appendix</u></p>
<b>9. Is all or part of the claim secured?</b>	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature or property:</b> <div><input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>. <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____</div> <b>Basis for perfection:</b> _____ <small>Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)</small>  <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____  <b>Annual Interest Rate</b> (when case was filed) _____ % <div><input type="checkbox"/> Fixed <input type="checkbox"/> Variable</div></div>
<b>10. Is this claim based on a lease?</b>	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b>   \$ _____</div>
<b>11. Is this claim subject to a right of setoff?</b>	<div><input checked="" type="checkbox"/> No</div> <div><input type="checkbox"/> Yes. Identify the property: _____</div>



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ \_\_\_\_\_

☐ Up to \$3,800\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

☐ Wages, salaries, or commissions (up to \$17,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☒ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 11/21/2025  
MM / DD / YYYY

/s/Aaron Halegua  
Signature

Print the name of the person who is completing and signing this claim:

Name Aaron Halegua  
First name Middle name Last name

Title \_\_\_\_\_

Company Aaron Halegua, PLLC  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_

Contact phone \_\_\_\_\_ Email \_\_\_\_\_



# Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 812-2297 | International (781) 575-4050

<b>Debtor:</b> 25-58764 - Wellmade Floor Coverings International, Inc. <b>District:</b> Northern District of Georgia, Atlanta Division		
<b>Creditor:</b> Aaron Halegua, PLLC 524 Broadway, 11th Floor New York, NY, 10012 <b>Phone:</b> <b>Phone 2:</b> <b>Fax:</b> <b>Email:</b> ah@aaronhalegua.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded <b>Related Document Statement:</b>	
	<b>Has Related Claim:</b> No <b>Related Claim Filed By:</b>	
	<b>Filing Party:</b> Creditor	
	<b>Other Names Used with Debtor:</b>  <b>Amends Claim:</b> No <b>Acquired Claim:</b> No	
<b>Basis of Claim:</b> Statutory fee-shifting, as set forth in Appendix	<b>Last 4 Digits:</b> No	<b>Uniform Claim Identifier:</b>
<b>Total Amount of Claim:</b> 664,000 or more	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> No	<b>Priority Under:</b>	
<b>Has Secured Claim:</b> No <b>Amount of 503(b)(9):</b> No <b>Based on Lease:</b> No <b>Subject to Right of Setoff:</b> No	<b>Nature of Secured Amount:</b> <b>Value of Property:</b> <b>Annual Interest Rate:</b> <b>Arrearage Amount:</b> <b>Basis for Perfection:</b> <b>Amount Unsecured:</b>	
<b>Submitted By:</b> Aaron Halegua on 21-Nov-2025 1:52:05 p.m. Pacific Time <b>Title:</b> <b>Company:</b> Aaron Halegua, PLLC		

## APPENDIX

1. Claimant Aaron Halegua, PLLC files this Proof of Claim for statutorily-shifted legal fees and expenses related to representing former Wellmade employees in their claims against the Debtors.
2. On May 27, 2025, Yucong Liu and others filed a Complaint in the U.S. District Court for the Northern District of Georgia in the civil matter *Liu, et al. v. Wellmade Industries MFR. N.A. LLC, et al.*, Case No. 4:25-cv-001340-WMR. A copy of the Complaint has been filed in this matter. (ECF No. 171-1, App. C).<sup>1</sup>
3. The Complaint asserted TVPRA, Georgia RICO, unjust enrichment, and *quantum meruit* claims on behalf of a group of individuals (the “Class”).
4. The Complaint asserted a claim under the FLSA on behalf of a group of workers at the Debtors’ factory in Cartersville, Georgia (the “Cartersville Facility”) who were not paid overtime (the “FLSA Collective”).
5. Claimant has now filed Proofs of Claim on behalf of the Class, the FLSA Collective, as well as on behalf of numerous individuals (the “Labor Plaintiffs”) who are members of this putative Class and/or FLSA Collective.<sup>2</sup>
6. Since the Class, FLSA Collective, and Labor Plaintiffs have brought claims under the TVPRA, Georgia RICO, and/or FLSA, they are entitled to recover attorneys’ fees and costs from the Debtors if they prevail on those claims, which will be paid to the Claimant. 18 U.S.C. § 1595(a), O.C.G.A. § 16-14-6(c), 29 U.S.C. § 216(b).
7. Claimant, along with its cocounsel, Radford Scott LLP and Levene, Neale, Bender, Yoo & Golubchik L.L.P. (together, “Co-Counsel”), has spent hundreds of hours and incurred significant expenses in investigating and pursuing the claims of the Labor Plaintiffs, Class, and FLSA Collective, both prior to this bankruptcy proceeding and as part of this bankruptcy proceeding.
8. Claimant and its Co-Counsel have already spent more than 1200 hours pursuing claims on behalf of the Labor Plaintiffs, Class, and FLSA Collective, and thus have a lodestar in excess

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<sup>1</sup> Parties in interest may receive electronic copies of these filed pleadings by accessing the Court’s docket or by sending a written request by email to Claimant’s counsel, whose name and contact information appears on the Proof of Claim form to which this Appendix is attached.

<sup>2</sup> The Labor Plaintiffs currently include the following individuals, but more may be added: Yucong Liu, Cangen Han, Yixiang Zhang, Yao Yan, Haitao Sun, Shuai Zhang, Nan Liu, Jiansheng Yin, Jiagen Yang, Jingjing Zhang, Yanxi Gao, Weiwei Li, Sijian Jiang, Xianlai Wei, Pan Wang, Wen Chen, Shengda Yu, Shengxiang Yu, Shun Yu, Shunkui Wang, Jinchao Si, Guangshun Xing, Yorman Ojeda Herrera, Marianela Piña Yaguari, and Eglis Almarza Diaz.

of \$650,000 and have incurred costs of over \$14,000. These numbers will continue to increase as Claimant performs additional work and incurs additional expenses in pursuing these claims, and Claimant anticipates amending this Proof of Claim accordingly.

### **Reservation of Rights**

9. Claimant files this Proof of Claim to preserve its claim against the Debtors. However, Claimant does not consent to the jurisdiction of the bankruptcy court to adjudicate or estimate its claim. To the extent applicable, Claimant reserves its right to jury trial in the district court where the Complaint was filed. Claimant reserves its right to amend this Proof of Claim.
10. The filing of this Proof of Claim is not and should not be construed to be: (a) a waiver or release of any of Claimant's rights against any other entity or person for all or any part of any claim set forth herein; (b) a waiver of the right to seek to have the reference withdrawn with respect to the subject matter of this Claim or with respect to any objection or other proceeding; (c) a waiver of any right to the subordination, in favor of the Claimant, of indebtedness or liens held by other creditors of the Debtors; (d) an election of remedy which waives or otherwise affects any other remedy of the Claimant, including entitlement to the recovery of attorneys' fees and costs; (e) a waiver of the Claimant's right to file a request for payment of administrative expenses under 11 U.S.C. § 503(b); (f) a waiver of a right to trial by jury; or (g) a waiver of a right to pursue any claims through an adversary proceeding.
11. The Claimant reserves the right to amend, modify, or supplement its Claim. By filing this Claim, the Claimant intends to provide notice to the Debtors of any and all claims, now known and unknown, as some claims may not be known until discovery is exchanged or further information becomes available. Furthermore, the Claimant asserts any and all of its rights and remedies at law, including any and all cross and counter-claims. To the extent it is determined that any claim herein properly lies against any jointly administered entity, the Claimant hereby gives notice of its intent that the Claim be deemed filed in any such case against any such entity. The Claimant also reserves the right to assert any portion of the Claim as a secured claim based upon any right to setoff pursuant to 11 U.S.C. § 553. Nothing in the Claim is intended to limit the Claimant's rights against any third party or any rights they have at law or in equity. The Claimant reserves all rights to further assert and pursue any post-petition administrative claims against the Debtors' estates.
12. To the extent that the Claimant discovers additional information regarding the Claim, and while noting that Claimants not yet been afforded the right to any discovery relating to its claims, the Claimant hereby expressly reserves any and all rights to amend or supplement its Claim as necessary. The Claimant further reserves its right to amend this Proof of Claim in any way, including, but not limited to, adding additional law firms to this Proof of Claim if it becomes reasonable and advisable to involve other law firms as co-counsel in pursuit of the claims by the Labor Plaintiffs, Class, and/or FLSA Collective.