

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

<p>In re:</p> <p>WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-58764</p> <p>(Jointly Administered)</p>
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**DEBTORS’ OMNIBUS OBJECTION TO PROOFS OF CLAIM FILED BY IRFAN KIZILELMA, YUSHAN KUO, WEIQING LI, YANG LIU, AND YAN SHUANGYUN**

*(Disallowance of Claim Nos. 41, 71, 72, 73, 97, and 115)*

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby file this Objection to Proofs of Claim Filed by Irfan Kizilelma, YuShan Kuo, Weiqing Li, Yang Liu, and Yan Shuangyun (collectively, the “Claimants”) pursuant to sections 105 and 502 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”). A proposed order is attached hereto as **Exhibit A** (the “Proposed Order”). In support of this Objection, the Debtors respectfully state as follows:

**JURISDICTION AND VENUE**

1. The United States Bankruptcy Court for the Northern District of Georgia (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a

<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.



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 sections 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rule 3007, Local Rule 3007-1, and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”).

## **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 Claims Reconciliation Process**

8. 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”).

9. 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.

10. The Claimants are represented by the law firm of Hall & Lampros, LLP.<sup>2</sup> The Claimants filed the following proofs of claim:

<b>Claimant</b>	<b>Claim No.</b>	<b>Alleged Bases for Claim</b>	<b>Amount</b>
Irfan Kizilelma	41	“Over time and Bonus”	\$15,000.00
Irfan Kizilelma	115	“Overtime, Off the Clock Work, Unpaid Wages, Trafficking – Forced Labor, Discrimination, Retaliation”	Unknown
YuShan Kuo	71	“Overtime, Unpaid Wages, Trafficking, Forced Labor, Discrimination, Retaliation”	Unknown
Weiqing Li	73	“Failure to Pay Overtime, Off the Clock Work, Unpaid Wages, Forced Labor, Discrimination, Retaliation”	Unknown
Yang Liu	97	“Overtime, Unpaid Wages, Trafficking, Forced Labor, Discrimination, Retaliation”	Unknown
Yan Shuangyun	72	“Overtime, Unpaid Wages, Trafficking, Forced Labor, Discrimination, Retaliation”	Unknown

The aforementioned claims shall be collectively referred to as the “Claims.”

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<sup>2</sup> The Claimants do not include those claimants represented by Aaron Halegua and the Radford Scott law firm.

11. The Debtors have reviewed the Claims and believe they are subject to disallowance in their entirety.

### **RELIEF REQUESTED**

12. The Debtors respectfully request the entry of an order disallowing the Claims in their entirety.

### **GROUND FOR OBJECTION**

13. Bankruptcy Code section 502 provides, in pertinent part, that “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). The debtor has a duty to object to the allowance of any claim that is improper. See 11 U.S.C. § 1107(a).

14. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See id.*; *see also* Bankruptcy Rule 3001(f) (a properly executed and filed proof of claim “constitute[s] *prima facie* evidence of the validity and amount of the claim”).

15. A party wishing to dispute a claim’s validity must produce evidence sufficient to negate the claim’s *prima facie* validity. *See Allegheny*, 954 F.2d at 173–74. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* at 174; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS 1166, at \*6-7 (N.D. Ga. Feb. 13, 2015); *Chambliss v. Oakwood Acceptance Corp. (In re Chambliss)*, 315 B.R. 166, 169 (Bankr. S.D. Ga. 2004).

Ultimately, the burden of persuasion is on the claimant. *See In re Moss*, No. 94- 11959, 1995 WL 17005342, at \*1 (Bankr. S.D. Ga. Sept. 28, 1995).

16. Bankruptcy Rule 2007(d)(1) permits objections to multiple claims to be joined in a single omnibus objection where the claims were all filed by the same entity. Accordingly, the Debtors object to each of the Claims in this objection.

#### **I. The Kizilelma Claims Should Be Disallowed.**

17. The proofs of claim filed by Irfan Kizilelma should be disallowed for several reasons, as detailed below.

##### **A. Claim No. 41 is Duplicative of Claim No. 115.**

18. First, some or all of the amounts claimed by Kizilelma in Claim No. 41 are duplicative of the amounts claimed in Claim No. 115. Claim No. 41 was apparently filed by Kizilelma without counsel, but his counsel filed Claim No. 115. Indeed, both claims refer to amounts purportedly due for overtime and unpaid wages/bonus. Accordingly, Claim No. 41 should be disallowed in its entirety as the amounts claimed therein are duplicative of those claimed in Claim No. 115.

##### **B. Claim Nos. 41 and 115 Contain Insufficient Documentation.**

19. Second, both Claim Nos. 41 and 115 were filed without any supporting documentation, much less the documentation required to substantiate the *prima facie* basis of the claims asserted therein as required by Bankruptcy Rule 3001 and the Bar Date Order.

20. The Bar Date Order provides that “[e]ach Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).” Bar Date Order, ¶ 11(e).

21. Because Kizilelma failed to include any supporting documentation for his claims

and has alleged no facts supporting his theories of recovery, his claims should be disallowed.

**C. Claim Nos. 41 and 115 Should be Disallowed on Substantive Grounds.**

22. Finally, the claims asserted by Kizilelma should be disallowed because they lack merit. First, upon his voluntary resignation from the Debtors on October 17, 2025, Kizilelma signed a letter stating, among other things, that:

- “I received and/or verified my final paycheck”; and
- “My final paycheck accurately reflects wages, including all hours that I worked and any necessary withholding.”

Accordingly, when he left his employment, Kizilelma acknowledged that he was not due any additional amounts in wages from the Debtors.

23. While his claims are not clear, Kizilelma apparently claims that he was the victim of human trafficking and forced labor. These claims are frivolous for several reasons. First, no such trafficking or forced labor ever occurred. Second, Kizilelma was in a management role at the Debtors’ warehouse in Oregon – across the country from the Georgia factory where human trafficking is alleged to have occurred. Third, he resigned voluntarily from his employment after establishing a business that competed, and did business, the Debtors. The Debtors were not aware of this competing business and when management learned of it and confronted Kizilelma, he resigned. The Debtors’ estates hold causes of action against Kizilelma for establishing this business and profiting from business dealings with the Debtors. These causes of action more than offset any amounts due to Kizilelma.

24. Additionally, Kizilelma was not discriminated or retaliated against, and he did not provide “off the clock” work for Wellmade. He provides no detail regarding these allegations and, unless he does so, has not met his burden of proof much less made out a *prima facie* claim.

Accordingly, the claims filed by Kizilelma should be disallowed in their entirety.

## **II. The Kuo, Li, Liu, and Shuangyun Claims Should Be Disallowed.**

### **A. Claim Nos. 71, 72, 73, and 97 Contain Insufficient Documentation.**

25. The claims filed by Kuo, Li, Liu, and Shuangyun were filed without any supporting documentation, much less the documentation required to substantiate the *prima facie* basis of the claims asserted therein as required by Bankruptcy Rule 3001 and the Bar Date Order.

26. The Bar Date Order provides that “[e]ach Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).” Bar Date Order, ¶ 11(e).

27. Because these claimants failed to include any supporting documentation for their claims, they should be disallowed.

### **B. Claim Nos. 71, 72, 73, and 97 Should be Disallowed on Substantive Grounds.**

28. Kuo, Li, Liu, and Shuangyun have filed bare proofs of claim with nearly non-existent allegations of claims such as “Overtime, Unpaid Wages, Trafficking, Forced Labor, Discrimination, Retaliation.” The claims were filed on the bar date and are nearly identical. No particularized facts or other information are provided by these claimants. Indeed, the claimants only filed bare proofs of claim.

29. In the claims, no detail is provided regarding, among other things:

- Who at the Debtors is accused of having committed the alleged acts forming the basis for the allegations;
- Who is alleged to have witnessed the events at issue;
- What facts support these alleged claims;
- When the events forming the basis for the claims occurred;

- Where the events are alleged to have occurred; and
- The amount claimed by the claimants.

Because the claims lack sufficient detail, they should be disallowed in their entirety.

### **RESERVATION OF RIGHTS**

30. The Debtors reserve all rights to amend, modify, or supplement this Objection and the Proposed Order, and to file additional objections to any claims filed in these Chapter 11 Cases. The Debtors further reserve all rights, claims, and defenses with respect to all claims, including the claim addressed herein. Nothing in this Objection or the Proposed Order shall be deemed to impair, waive, or otherwise limit any such rights, claims, or defenses, all of which are expressly preserved.

### **NOTICE**

31. The Debtors will provide notice of this Motion to the following parties or their respective counsel, if known: (a) each of the Claimants, (b) the Office of the U.S. Trustee for the Northern District of Georgia, (c) the Committee; (d) the Debtors' prepetition and postpetition lenders; (e) the Limited Service List; and (f) 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.

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**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: February 23, 2026  
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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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.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**ORDER SUSTAINING DEBTORS' OMNIBUS OBJECTION TO PROOFS OF CLAIM  
FILED BY IRFAN KIZILELMA, YUSHAN KUO, WEIQING LI, YANG LIU, AND YAN  
SHUANGYUN**

Upon the *Debtors' Omnibus Objection To Proofs Of Claim Filed By Irfan Kizilelma, Yushan Kuo, Weiqing Li, Yang Liu, and Yan Shuangyun*, dated February 23, 2026 [Docket No. •] (the "Objection")<sup>2</sup> filed by the above-captioned debtors and debtors in possession (collectively, the

<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> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

“Debtors”), for entry of an order (this “Order”) disallowing and expunging Claim Nos. 41, 71, 72, 73, 97, and 115; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and it appearing that due and adequate notice of the Objection has been given under the circumstances; and the Court having reviewed the Objection and having heard the statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon the record of the Hearing, 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 Objection is SUSTAINED, as set forth herein.
2. Claim Nos. 41, 71, 72, 73, 97, and 115 are disallowed and expunged.
3. Nothing set forth in this Order shall be construed as, or shall in any way constitute, a waiver of the Debtors’ or any successor’s rights to assert objections to the Claims on any additional grounds whatsoever.
4. The Debtors and their claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita, as well as the Clerk of the Court, are authorized to take all such actions as are necessary and appropriate to effectuate the terms of this Order.
5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

END OF DOCUMENT

*Prepared and presented by:*

GREENBERG TRAURIG, LLP

*/s/ John D. Elrod*

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*Counsel for the Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2026, all ECF participants registered in this case were served electronically with the foregoing Objection 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 Objection, including on the Limited Service List. The Claimants were also served through U.S. Mail and electronic mail as follows:

Christopher B. Hall  
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Atlanta, GA 30339  
[chall@hallandlampros.com](mailto:chall@hallandlampros.com)

Dated: February 23, 2026  
Atlanta, Georgia

Respectfully submitted,

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/s/ John D. Elrod

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