

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

<p>In re:</p> <p>WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., <i>et al.</i>,¹</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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**NOTICE OF DEBTORS’ SECOND MOTION FOR ENTRY OF ORDER
EXTENDING EXCLUSIVE PERIODS TO FILE A CHAPTER 11 PLAN
AND SOLICIT ACCEPTANCES THEREOF, DEADLINE TO OBJECT AND HEARING**

PLEASE TAKE NOTICE that, on February 26, 2026, the above-captioned debtors and debtors in possession (the “Debtors”) filed a *Second Motion for Entry of Order Extending Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* (the “Motion”). Pursuant to the Fifth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or hearing if no party in interest files a response or objection **within twenty-one (21) days** from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at Clerk at the United States Bankruptcy Court for the Northern District of Georgia, 75 Ted Turner Drive, SW, Suite 1340, Atlanta, Georgia 30303, and serve a copy on the Debtors’ attorney, at Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com), and any other appropriate persons by the objection deadline.** The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the Motion has been scheduled for March 31, 2026. The Court will hold a hearing on the Motion at 1:30 p.m. (prevailing Eastern Time) on March 31, 2026 in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303, which must be attended in person, unless the Court orders otherwise.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested in the Motion without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the

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.



relief request at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. 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.

Date: February 26, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAUIG, LLP

/s/ John D. Elrod

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

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

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

DEBTORS' SECOND 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 another 90 days (a) the period which the Debtors have the exclusive right to file a chapter 11 plan, through and including May 31, 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 July 30, 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.

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.

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 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. Resolution of Claims and Pending Litigation

14. Over the course of the Exclusive Periods, 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”).

15. 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”)² [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*

² The “Labor Plaintiffs” include the twenty-five (25) individuals who filed proofs of claim against the Debtors and that, prior to the Chapter 11 Cases, had initiated a class action law suit in the District Court for the Northern District of Georgia.

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.

16. 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 mediate their disputes. The mediation occurred on January 20, 2026 with the Honorable Jeffrey W. Cavender serving as mediator.

17. The Debtor and the Labor Plaintiffs reached an agreement in principle during the mediation, subject to certain conditions precedent which have not yet been met (the “Contingent Settlement”).³

18. In addition to negotiating the Contingent Settlement, on February 23, 2026, the Debtors filed *Debtors’ Omnibus Objection to Proofs of Claim Filed by Irfan Kizilelma, Yushan Kuo, Weiqing Li, and Yan Shuangyun* [Docket No. 331], seeking to disallow claims filed by alleged former employees of the Debtors.

19. Following the disposition of the omnibus objection and finalizing the Contingent Settlement, the Debtors will have resolved all claims and litigation related to the alleged human trafficking asserted against the Debtors prior to the Petition Date.

IV. Other Pending Matters in these Chapter 11 Cases

20. 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

³ The term sheet includes certain conditions precedent to execution of the settlement agreement which the Debtors are in the process of completing.

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 the Labor Plaintiffs and other creditors; (v) resolving claims against the estates; and (vi) addressing numerous questions, concerns and issues raised by employees, vendors, customers and other parties in interest.

21. The Debtors are now resolving outstanding claims, winding down the Debtors’ businesses, and preparing a chapter 11 plan.

22. Accordingly, for the reasons discussed herein, the Debtors seek a further extension of the Exclusive Periods to allow the Debtors additional time to proceed with the Chapter 11 Cases, including soliciting, confirming and consummating a chapter 11 plan.

V. Prior Extension of Exclusivity Periods

23. Following a motion by the Debtors, the Court previously entered the *Order Extending Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof* [D.I. 277], extending the Exclusive Filing Period through and including March 2, 2026 and the Exclusive Solicitation Period through and including May 1, 2026.

RELIEF REQUESTED

24. The Debtors respectfully request entry of the Proposed Order (i) extending the current Exclusive Periods by another 90 days through and including May 31, 2026 to file a chapter 11 plan and July 30, 2026 to solicit acceptances to the chapter 11 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

25. 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.”

26. 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).

27. 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 Adelpia Commc'ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006).

28. 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.

29. 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).

30. Accordingly, for the reasons set forth herein, the Debtors believe that such “cause” exists to further extend the Exclusive Periods by 90 days each.

II. Good Cause Exists to Extend the Exclusive Periods.

31. This is the Debtors’ second request for an extension of its Exclusive Periods. The factors discussed below weigh in favor of an extension.

A. The Chapter 11 Cases are Complex, and Only Six Months Have Elapsed Since the Cases were Filed.

32. The Chapter 11 Cases are sufficiently complex to warrant the requested extension of the Exclusive Periods. There are several prepetition lawsuits pending against the Debtors, one of which is a class action suit. While the Debtors have reached the Contingent Settlement, additional steps are required before the settlement is fully consummated.

33. The Debtors have used the past six month to resolve key litigation, conduct a private sale of substantially all of their assets, respond to formal and informal information requests from various parties, and negotiate and finalize the postpetition financing necessary to maintain operations during the Chapter 11 Cases. The Debtors can now put their focus on finalizing a consensual plan of reorganization. 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.

34. 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 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.

- (e) **Resolution of Class Action Lawsuit.** The Debtors have negotiated the Contingent Settlement with the Labor Plaintiffs, resolving some of the largest claims against the Debtors' estates, and putting the Debtors in a position to propose a consensual plan.

35. In sum, the good faith efforts and progress exhibited by the Debtors in the Chapter 11 Cases support a further 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.

36. Since the Petition Date, the Debtors and their professionals have focused much of their time, energy, and resources on administering the Chapter 11 Cases, finalizing a private sale of substantially all the Debtors' assets, and negotiating with vendors and other creditors, including the Committee and the Labor Plaintiffs. 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 resolved, in principle, burdensome prepetition litigation, the Debtors require additional time 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 further extending the Exclusive Periods.

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

37. 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 further extending the Exclusive Periods.

E. The Debtors Have Made Progress in Negotiating with Creditors, and are Not Seeking an Extension to Pressure Creditors.

38. The Contingent Settlement marks a huge step towards the resolution of these Chapter 11 Cases, as these claims and the contention relationship between the Debtors and the Labor Plaintiffs had consumed much of the Debtors' focus up to this point. Further, granting the requested extensions of the Exclusive Periods will not pressure the Debtors' creditors or grant the Debtors any unfair bargaining leverage. In fact, one main purpose of this extension is to allow the Debtors to finalize the Contingent Settlement. The Debtors have also been in regular communications with the Committee and other creditors on 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

39. The consideration received from the private sale will almost certainly be sufficient to pay the claims of all allowed creditors in full. The Contingent Settlement also contemplates a confirmable plan. 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.

40. While the Debtors have resolved, in principle, the Labor Plaintiffs' claims via the Contingent Settlement, there are other outstanding claims, such as the claims in the Omnibus Objection, that need to be resolved. The existence of such unresolved contingencies weighs in favor of granting the requested extension of the Exclusive Periods. Further, the Debtors will continue to use any extension of the exclusivity period to work 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.

41. 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.

I. The Committee Supports the Extension of the Exclusive Periods.

42. Finally, the Debtors have discussed the proposed extension of the Exclusive Periods with counsel to the Committee. The Committee's counsel has indicated that the Committee supports the proposed extension. Given that the Debtors' DIP Lender and prepetition lender have been paid in full, all major creditor constituents support the extension.

43. Based upon the foregoing, the Debtors respectfully submit that cause exists to extend the Exclusive Periods as requested herein.

NOTICE

44. 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.

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 26, 2026
Atlanta, Georgia

Respectfully submitted,

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 26, 2026, 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: February 26, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAUIG, 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:

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

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

Re Docket No. __

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

Upon the *Debtors' Second 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 U.S.C. § 157(b); and venue of these Chapter 11 Cases and the Motion

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in 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 (i) the opportunity to object to relief required in the Motion by March 19, 2026 (the “Objection Deadline”) and (ii) hearing on the Motion scheduled for March 31, 2026 at 1:30 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the Fifth Amended and Restated General Order No. 24-2018; and no objection to the Motion having been filed prior to the Objection Deadline; and based on the foregoing, 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 May 31, 2026.
3. The Exclusive Solicitation Period is extended through and including July 30, 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/ John D. Elrod

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