

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-SMS

(Jointly Administered)

Re: Docket Nos. 38, 137, 194

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 6, 2025 AT 11:00 A.M. (ET)**

Time and Date of Hearing: October 6, 2025 at 11:00 a.m. (prevailing Eastern Time)

Location of In-Person Hearing: The Honorable Sage M. Sigler
United States Bankruptcy Court for the
Northern District of Georgia
**Richard B. Russell Federal Building and
United States Courthouse
Courtroom 1201
75 Ted Turner Drive, S.W.
Atlanta, Georgia 30303**

Copies of Pleadings: A copy of each pleading can be viewed on the Court's website at www.ganb.uscourts.gov and the website of the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants LLC dba Verita Global, at <https://www.veritaglobal.net/Wellmade>. Further information may be obtained by using the "Submit an Inquiry" function at <https://www.veritaglobal.net/Wellmade/inquiry>.

MATTERS GOING FORWARD

1. ***Bidding Procedures Motion.*** 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,

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.



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(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 [Docket No. 38] (the "Bidding Procedures Motion").

Response Deadline: August 18, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed:

- A. Limited Objection of Lex 51 Bartow LLC to Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 181]
- B. Oracle's Limited Objection to and Reservation of Rights Regarding Debtors' Sale Motion and Related Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 183]

Related Documents:

- C. Declaration of Teri Stratton in Support of the Debtors' Bidding Procedures Motion [Docket No. 39]
- D. Emergency Motion of the Debtors for Entry of an Order Shortening Notice and Scheduling Expedited Hearing on 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 [Docket No. 40]
- E. Order Shortening Notice and Scheduling Expedited Hearing on 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 [Docket No. 56]

- F. Certificate of Service of Docket Nos. 38, 39, 40, 56 [Docket No. 61]
- G. Notice of Filing Modified Proposed Order (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 [Docket No. 77]
- H. 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 [Docket No. 99]
- I. Notice of Proposed Sale, Bidding Procedures, Auction, and Sale Hearing [Docket No. 101]
- J. Certificate of Service of Docket No. 99 [Docket No. 109]
- K. Amended Notice of Proposed Sale, Bidding Procedures, Auction, and Sale Hearing [Docket No. 127]
- L. Notice of Proposed Assumption and Assignment of Certain Executory Contracts [Docket No. 168]
- M. Notice of Cancellation of Auction [Docket No. 177]

Status: This matter is going forward. The Debtors will seek approval of the Private Sale Motion referenced below, which contemplates a private sale to AHF IC, LLC.

2. **Bar Date Motion.** Debtors' Motion Seeking Entry of an 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 Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief

[Docket No. 137] (the “Bar Date Motion”).

Response Deadline: September 15, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed:

- A. Limited Objection of the Committee of Creditors Holding Unsecured Claims to Debtors’ Motion Seeking Entry of an 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 Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief [Docket No. 169] (the “Committee Limited Objection”)
- B. Creditors Yucong Liu, Yixiang Zhang, and Cangen Han's Limited Objection to Debtors’ Motion Seeking Entry of an Order Setting a Bar Date for Filing Proofs of Claim and Other Relief [Docket Nos. 170 & 171]² (the “Labor Plaintiffs’ Objection”)
- C. Debtors’ Reply in Support of Motion Seeking Entry of an Order (i) Setting 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 and Manner for Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief [Docket No. 197] (the “Debtors’ Reply”)

Related Documents:

- D. Emergency Motion of the Debtors for Entry of an Order Shortening Notice and Scheduling Expedited Hearing on Debtors Motion Seeking Entry of an 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 Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief [Docket No. 138]
- E. Order Shortening Notice and Scheduling Expedited Hearing on Debtors’ Motion Seeking Entry of an 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 Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief [Docket No. 140]

² These documents appear to be duplicative, except that Docket No. 171 includes exhibits which were not attached to Docket No. 170.

- F. Notice of Hearing [Docket No. 141]
- G. Certificate of Service of Docket Nos. 137 and 138 [Docket No. 145]
- H. Certificate of Service of Docket Nos. 140 and 141 [Docket No. 147]
- I. Docket entry noting Rescheduled Hearing to be held on 9/29/2025 at 10:00 AM in Courtroom 1201, Atlanta
- J. Certificate of Service of Docket No. 197 [Docket No. 204]

Status: The Debtors and the Committee have resolved the issues outlined in the Committee Limited Objection, except for one sentence in the proposed bar date notice. The Labor Plaintiffs' Objection remains unresolved. This matter is going forward on a contested basis.

3. ***Private Sale Motion.*** Motion of the Debtors for Entry of an Order (A) Approving Private Sale of the Debtors' Assets Free and Clear of All Liens, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 194] (the "Private Sale Motion").

Response Deadline: September 30, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed:

- A. Creditors Yucong Liu, Yixiang Zhang, and Cangen Han's Limited Objection to Debtors' Motion Seeking Entry of an Order Approving Sale [Docket No. 203] (the "Labor Plaintiffs' Limited Objection")

Related Documents:

- B. Notice of Filing Declaration of Teri Stratton in Support of the Debtors' Private Sale Motion [Docket No. 195]
- C. Notice of (I) Hearing on Motion of the Debtors for Entry of an Order (A) Approving Private Sale of the Debtors' Assets Free and Clear of All Liens, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief and (II) Continued Sale Hearing [Docket No. 196]
- D. Amended Notice of (I) Hearing on Motion of the Debtors for Entry of an Order (A) Approving Private Sale of the Debtors' Assets Free and Clear of All Liens, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief and (II) Continued Sale Hearing [Docket No. 199]

E. Certificate of Service of Docket Nos. 194, 195, 196, 199 [Docket No. 204]

F. Statement of the Committee of Creditors Holding Unsecured Claims in Support of the Motion of the Debtors for Entry of an Order (A) Approving Private Sale of the Debtors' Assets Free and Clear of All Liens, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 208]

Status: As referenced above, this matter is going forward on an uncontested basis other than an objection filed by Lex 51 Bartow LLC, which the parties continue to discuss. The objection filed by Oracle is moot as the Debtors have been advised that AHF IC, LLC does not intend to assume that contract. The Committee supports the proposed sale. The Labor Plaintiffs' Limited Objection to the sale is moot given that the issues raised have already been addressed in the APA filed in connection with the Private Sale Motion.

Dated: October 3, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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