Docket #0394 Date Filed: 06/08/2026

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

Filed in U.S. Bankruptcy Court
Northern District of Georgia
Vania S. Allen, Clerk
JUN - 8 2026
By: Deputy Clerk

In re:	Chapter 11
	Case No. 25-58764
WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., et al.,	(Jointly Administered)
Debtors.	

MOTION FOR LEAVE TO FILE LATE PROOF OF CLAIM BY CREDITOR GENGXU WANG

I, Gengxu Wang, am a former employee of the Debtors and a creditor in these Chapter 11 cases. I respectfully request that the Court allow me to file a late Proof of Claim.

Why I Did Not File on Time:

I never received any notice of this bankruptcy case or the claims bar date. No notice was ever sent to my address. I had no knowledge whatsoever that a bankruptcy case had been filed until I was recently informed by others.

This is not a situation where I received notice and failed to act. I received no notice at all.

I am a Chinese national with limited English proficiency. I had no lawyer. I had no knowledge of United States bankruptcy law or procedures. I did not know what a bar date or proof of claim was. Nobody told me that I had legal rights in this case or that I needed to do anything to protect them. Company's abuse had erased awareness of my rights.

My Employment and Claims:

I worked at Wellmade's Cartersville, Georgia facility from November 2024 through March 2025. I was present at the facility on March 26, 2025 when FBI, ICE, and Georgia Bureau of Investigation agents executed search warrants and identified hundreds of workers as potential trafficking victims. The Debtors knew I was an employee and a potential creditor. But I am not in the Notice List and did not get any notice. I also moved out in April 2025.

During my employment I consistently worked six or more days per week and more than 12 hours per day without receiving proper overtime pay. I was recruited from China to work for Wellmade

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and was subjected to the labor trafficking conditions confirmed by the federal investigation.

My claims include unpaid overtime wages under the FLSA, damages under the Trafficking Victims Protection Reauthorization Act, priority wage claims, and damages under Georgia RICO. My total claims are not less than $581,923.93 as set forth in my simultaneously filed Proof of Claim. My entire employment period falls within the 180-day priority window before the August 4, 2025 petition date making my entire wage claim a priority claim. Supporting documentation of my employment is attached hereto as Exhibit A.

Why the Court Should Allow My Late Filing:

Allowing my claim will cause no prejudice to the Debtors. The case is still active and no distribution has been made. I am filing as soon as I became aware of my rights. I am acting in complete good faith.

I had no way of knowing about this bankruptcy case. I received no notice. I had no lawyer. I have limited English. The conditions I was subjected to at Wellmade are the same conditions that made it impossible for me to independently discover and participate in these proceedings. This was not within my control.

Relief Requested:

I respectfully request that the Court:

1. Accept my Proof of Claim as timely filed

2. Order that I be given a fair opportunity to participate in settlement negotiations on equal terms with the named Labor Plaintiffs before any settlement is approved, given that my claims arise from identical conduct and I was excluded solely because I never received any notice of these proceedings

3. If any settlement is approved, order that it shall not affect, release, or extinguish my individual claims in any way and that I retain all rights to pursue my claims in full

4. Grant any other relief the Court finds just and proper

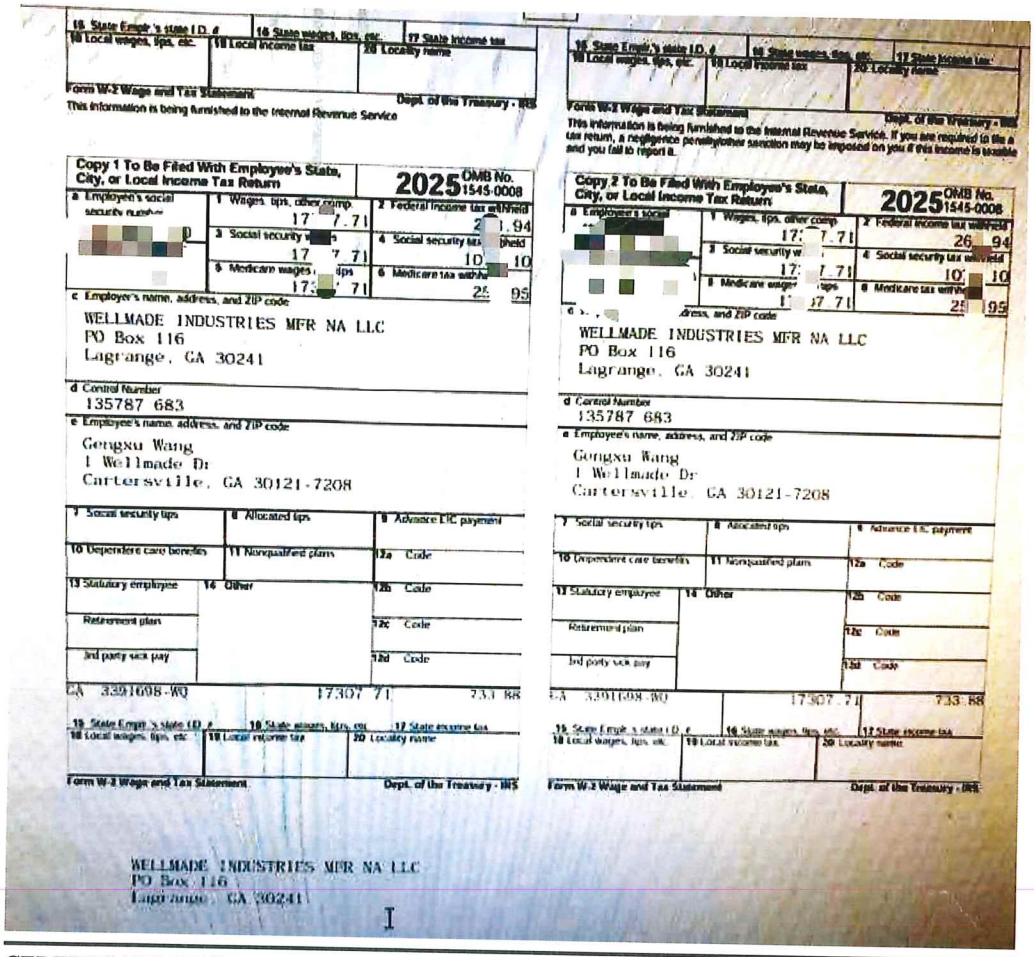
5. Request written communication from court in Chinese.

Respectfully submitted,

Gengxu Wang

Exhibit-

A


Form W-2 Wage and Tax Statement — Dept. of the Treasury - IRS
This information is being furnished to the Internal Revenue Service

Copy 1 To Be Filed With Employee's State, City, or Local Income Tax Return — 2025 OMB No. 1545-0008

WELLMADE INDUSTRIES MFR NA LLC
PO Box 116
Lagrange, GA 30241

Control Number
135787 683

Gengxu Wang
1 Wellmade Dr
Cartersville, GA 30121-7208

GA 3391698-WQ 17307.71 733.88

Copy 2 To Be Filed With Employee's State, City, or Local Income Tax Return — 2025 OMB No. 1545-0008

This information is being furnished to the Internal Revenue Service. If you are required to file a tax return, a negligence penalty or other sanction may be imposed on you if this income is taxable and you fail to report it.

WELLMADE INDUSTRIES MFR NA LLC
PO Box 116
Lagrange, GA 30241

Gengxu Wang
1 Wellmade Dr
Cartersville, GA 30121-7208

GA 3391698-WQ 17307.71 733.88

WELLMADE INDUSTRIES MFR NA LLC
PO Box 116
Lagrange, GA 30241

I

CERTIFICATE OF SERVICE

I certify that on June, 5, 2026 I sent copies of this Motion by email and first class mail or priority mail to:

John D. Elrod / Allison J. McGregor
Greenberg Traurig LLP
Terminus 200, 3333 Piedmont Road NE
Suite 2500, Atlanta GA 30305
elrodj@gtlaw.com
Allison.McGregor@gtlaw.com

Gengxu Wang
Date: June, 5, 2026

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Atlanta, GA 30303

TO: U.S. Bankruptcy Court clerk
Northern District of Georgia
75 Ted Turner Drive, SW, Suite
1340 Atlanta, Georgia 30303

Label 228, July 2013

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