IN THE 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 (Jointly Administered) **Re: Docket Nos. 402, 403 & 404**

NOTICE OF FILING DECLARATION OF ANDRES A. ESTRADA IN SUPPORT OF DEBTORS' RESPONSES TO HAITAO LI, BO DENG, AND GENGXU WANG'S MOTIONS FOR LEAVE TO FILE LATE PROOF OF CLAIM

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through undersigned counsel, hereby file the attached *Declaration of Andres A. Estrada in Support of Debtors' Responses to Haitao Li, Bo Deng, and Gengxu Wang's Motions for Leave to File Late Proof of Claim*.

Dated: June 16, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP
/s/ John D. Elrod
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[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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IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
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In re: WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*,[2] Debtors.	Chapter 11 Case No. 25-58764 (Jointly Administered) **Re: Docket Nos. 402, 403 & 404**

DECLARATION OF ANDRES A. ESTRADA IN SUPPORT OF DEBTORS' RESPONSES TO HAITAO LI, BO DENG, AND GENGXU WANG'S MOTIONS FOR LEAVE TO FILE LATE PROOF OF CLAIM

I, Andres A. Estrada, declare under penalty of perjury as follows:

1. I am a Managing Director of Corporate Restructuring of Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita"), a chapter 11 administrative services firm whose headquarters are located at 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, California, 90245. Except as otherwise noted in this declaration (the "Declaration"), I have personal knowledge of the matters set forth herein, and if called as a witness, I could and would testify competently thereto.

2. I submit this Declaration in support of (i) *Debtors' Response to Haitao Li's Motion for Leave to File Late Proof of Claim* [Docket No. 402]; (ii) *Debtors' Response to Bo Deng's Motion for Leave to File Late Proof of Claim* [Docket No. 403]; and (iii) *Debtors' Response to*

[2] 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.

Gengxu Wang's Motion for Leave to File Late Proof of Claim [Docket No. 404] (collectively, the "Responses"),[3] filed by the above-captioned Debtors (the "Debtors") on June 14, 2026.

3. The Debtors retained Verita as their claims and noticing agent pursuant to the *Order Authorizing the Retention and Employment of Kurtzman Carson Consultants, LLC DBA Verita Global as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date*, dated August 7, 2025 [Docket No. 29]. Accordingly, Verita maintains the official claims register reflecting all claims listed in the Debtors' Schedules, as amended, and all filed proofs of claim (the "Claims Database"). Additionally, Verita maintains a database of names and addresses of all potential creditors and parties in interest of the Debtors (the "Creditor Matrix," and together with the Claims Database, the "Master Mailing List").

4. On August 18, 2025, at my direction and under my supervision, employees of Verita caused to be served the *Notice of Chapter 11 Bankruptcy Case* [Docket No. 43] (the "Bankruptcy Notice") via first class mail on all names and addresses in the Creditor Matrix as they existed at the time. As stated in the *Certificate of Service* [Docket No. 84, Exhibit C], the Bankruptcy Notice was served on the Creditor Matrix, including the following:

Bo Deng
66 Seminole Rd
Cartersville, GA 30121-7208

5. On October 11, 2025, at my direction and under my supervision, employees of Verita caused to be served (i) the *Notice of Deadlines for the Filing of (I) Proofs Of Claim, and (II) Rejection Damages Claims* [Docket No. 223] (the "Bar Date Notice") and (ii) the *Modified Official Form 410 Proof of Claim* [Docket No. 222, Exhibit 1] (the "Modified POC," and together

[3] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed in the Responses.

with the Bar Date Notice, the "Claim Package"), via first class mail on all names and addresses in the Creditor Matrix as they existed at the time.

6. On October 13, 2025, at my direction and under my supervision, employees of Verita served the Claim Package via email on all names and email addresses, as they existed at the time, of the Debtors' current and former employees and independent contractors.

7. On October 16, 2025, at my direction and under my supervision, employees of Verita filed the *Certificate of Service* [Docket No. 233] (the "Certificate of Service"), describing all parties that were served with the Claim Package and the manner in which they were served.

8. As indicated in the Certificate of Service, the Claim Package was served by mail and email on Bo Deng ("Deng"), Gengxu Wang ("Wang"), and Haitao Li ("Li").

9. Verita mailed and emailed the Claim Package to Deng at the following addresses:

Bo Deng
66 Seminole Rd
Cartersville, GA 30121-7208
dengbo19910708@qq.com

10. Verita mailed and emailed the Claim Package to Wang at the following addresses:

Gengxu Wang
1 Wellmade Dr.
Cartersville, GA 30121-7208
gengxuwang0@gmail.com
3830451393@qq.com

11. Verita mailed and emailed the Claim Package to Li at the following addresses:

Hai Tao Li
66 Seminole Rd
Cartersville, GA 30121-7208
891771095@qq.com

12. As part of Verita's ongoing maintenance of the Master Mailing List, Verita records all mail that is returned by the United States Post Office (the "Post Office") as either undeliverable or with forwarding information. When mail is returned by the Post Office with forwarding information, in addition to updating the Master Mailing List, Verita will send the mail to the new address provided. Verita also records any "bounce back" emails that indicate that the email failed to send to the recipient.

13. I have examined the Master Mailing List and have determined that the above-referenced Claim Package mailed to Deng, Wang and Li was not returned by the Post Office as undeliverable or with forwarding information. Additionally, Verita did not receive any "bounce back" emails for the Claims Package that were emailed to Deng, Wang and Li at dengbo19910708@qq.com, 3830451393@qq.com, and 891771095@qq.com, respectively.

14. Pursuant to the Bar Date Order, the Bar Date Notice included a link, https://www.veritaglobal.net/wellmade/info/14565, to Verita's website where claimants can submit electronic proofs of claim. This webpage includes a notice written in English, Mandarin and Spanish regarding the Bar Date alongside a link to the Modified POC.

15. On October 22, 2025, at my direction and under my supervision, employees of Verita filed the *Affidavit of Publication of the Notice of Deadline for Filing Proofs of Claim* [Docket No. 240] (the "Publication Affidavit").

16. As set forth in the Publication Affidavit and the exhibits thereto, a form of the Bar Date Notice was published in the Wall Street Journal on October 14, 2025. Additionally, a short form notice of the bar date was published in Mandarin Chinese in the *World Journal* on October 16, 2025, which contained a link (https://www.veritaglobal.net/wellmade/info/14565) to Verita's

Wellmade website which contains the Notice of Bar Date and Proof of Claim Form in Mandarin Chinese.

17. On June 1, 2026, Li filed the following electronic proof of claim through Verita's website: claim no. 142 in the amount of $152,015.10, with a priority amount claimed of $17,150.00.

18. On June 4 & 7, 2026, Wang filed the following electronic proofs of claim through Verita's website: (i) claim no. 143 in the amount of "$764,847.85 or more", with a priority amount claimed of $17,150.00, (ii) claim no. 146 in the amount of $581,923.93, with a priority amount claimed of $17,150.00, and (iii) claim no. 147 in the amount of $581,923.93, with a priority amount claimed of $17,150.00.

19. On June 6 & 7, 2026, Deng filed the following electronic proofs of claim through Verita's website: (i) claim no. 144 in the amount of $4,676,538.70, with a priority amount claimed of $17,150.00 and (ii) claim no. 145 in the amount of $4,954,774.35, with a priority amount claimed of $17,150.00.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 16, 2026

/s/ Andres A. Estrada

Andres A. Estrada
Managing Director of Corporate Restructuring
Kurtzman Carson Consultants, LLC d/b/a Verita Global

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2026, all ECF participants registered in this case were served electronically with the foregoing Declaration 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 Declaration, including service on Deng, Wang, and Li at the addresses provided in their Motions.

Dated: June 16, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP
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