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. 393, 394, 395**

DEBTORS' MOTION FOR ENTRY OF
AN ORDER ALLOWING REMOTE APPEARANCE OF WITNESS

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through undersigned counsel, hereby move the Court (the "Motion") for entry of an Order substantially in the form attached hereto as **Exhibit A**, to allow the remote appearance of the Debtors' witness at the hearing on the Late Claim Motions (as defined below) currently scheduled for July 16, 2026 at 10:00 a.m. (EST). In further support of the Motion, the Debtors respectfully state as follows:

1. On June 8, 2026, the following motions were filed by Bo Deng, Gengxu Wang, and Haitao Li (collectively, the "Movants") requesting that the Court permit them to file late proofs of claims in these above-captioned cases: (i) *Motion for Leave to File Late Proof of Claim by Creditor Bo Deng* [Docket No. 393]; (ii) *Motion for Leave to File Late Proof of Claim by Creditor Gengxu Wang* [Docket No. 394]; and (iii) *Creditor Haitao Li's Formal Objection to Proposed Settlement*

[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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Agreement and Motion for Allowance to File Late Proof of Claim Due to Excusable Neglect [Docket No. 395] (collectively, the "Late Claim Motions").

2. On June 14, 2026, the Debtors filed objections to each of the Late Claim Motions (collectively, the "Objections"). *See* Docket Nos. 402, 403 and 404. Additionally, on June 16, 2026, the Debtors filed the *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* [Docket No. 419] (the "Declaration").[2]

3. A hearing is currently set for July 16, 2026, at 10:00 a.m. in Courtroom 1201 on the Late Claim Motions (the "Hearing"), in which parties who intend to present evidence are required to appear in person. *See Order and Notice of Continued Hearing* [Docket No. 436].

4. At the Hearing, in support of their Objections, the Debtors may rely on the Declaration as an exhibit and declarant Andres A. Estrada ("Estrada") as a potential witness. The Debtors believe that Estrada's testimony will only be needed if a party seeks to cross-examine Estrada on the statements made in the Declaration.

5. Should he be called to testify as a witness at the Hearing, the Debtors respectfully request that Estrada be permitted to appear remotely at the Hearing.

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[2] *See Notice of Agenda of Matters Scheduled for Hearing on July 16, 2026 at 10:00 A.M. (ET)* [Docket No. 447], for a list of additional documents filed in response to the Late Claim Motions

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that this Court: (i) enter the proposed order attached hereto as **Exhibit A,** allowing Estrada to appear remotely at the Hearing, including any continued or reset hearing, on the Late Claim Motions and (ii) grant such other and further relief as the Court deems just and proper.

Dated: July 15, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

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Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 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 Movants at the addresses provided in the Late Claim Motions.

Dated: July 15, 2026
Atlanta, Georgia

Respectfully submitted,

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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.*,[1] Debtors.	Chapter 11 Case No. 25-58764 (Jointly Administered) **Re Docket Nos. 393, 394, 395**

[PROPOSED ORDER]

UPON CONSIDERATION of the foregoing *Motion for Entry of an Order Allowing Remote Appearance of Witness* [Docket No. __] (the "Motion") filed by the above-captioned debtors and

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debtors in possession (collectively, the "Debtors"), and for good cause shown, **IT IS HEREBY ORDERED** that:

1. The Motion is **GRANTED**;

2. **IT IS FURTHER ORDERED** that any witness that the Debtors intend to call to testify at the Hearing (or any continued or reset hearing) on the Late Claim Motions, including witness Andres A. Estrada, may appear via the Court's Virtual Hearing Room. Parties may join the Virtual Hearing Room through the "Dial-In and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Additional information about the hearing can be found on the "Hearing Information" tab on the judge's webpage. All other parties that intend to present evidence or testimony at the Hearing must attend the Hearing in person unless otherwise ordered by the Court.

END OF ORDER

Prepared and presented by:

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