

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

<p>In re:</p> <p>AFH AIR PROS, LLC, <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-10356 (PMB)</p> <p>(Jointly Administered)</p>
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**REQUEST FOR EXPEDITED CONSIDERATION OF  
CERTAIN FIRST DAY MATTERS**

On March 16, 2025, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors assert that the cases qualify as “Complex Chapter 11 Cases” and that they need expedited consideration of the following initial case matters (check those that apply):

- Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors (A) to Prepare and Maintain a Consolidated Master List of Creditors in Lieu of Submitting a Formatted Mailing Matrix for Each Debtor, (B) to Redact Personally Identifiable Information for Individual Creditors and Parties in Interest, and (C) to Provide Electronic Notice to Individual Customers and Maintain a Confidential Customer Service List [Docket No. 7]*
- Emergency Motion of the Debtors for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 9]*
- Emergency Application of the Debtors for Entry of an 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 [Docket No. 10]*

<sup>1</sup> The last four digits of AFH Air Pros, LLC’s tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the proposed claims and noticing agent at <https://www.veritaglobal.net/airpros>. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Plantation, Florida 33020.



- X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business forms and Checks, (II) Authorizing the Continued Use of Cash Management System, (III) Waiving Certain Investment and Deposit Guidelines, (IV) Authorizing the Debtors to Maintain Corporate Card Program and Honor Prepetition Obligations Related thereto, and (V) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. 11]*
- X *Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 12]*
- X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies, Pay All Policy Premiums, and Renew or Enter Into New Policies, and (B) Continue Insurance Premium Financing Program, Pay Insurance Premium Financing Obligations Arising in Connection therewith, and Renew Such Premium Financing Arrangements; (II) Authorizing the Debtors to Maintain and Continue their Surety Bond Program, Pay Obligations in Connection therewith, and Renew or Obtain New Surety Bonds; and (III) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related thereto [Docket No. 13]*
- X *Emergency Motion of the Debtors for Entry of an Order Authorizing (I) the Debtors to Pay Prepetition Taxes and Regulatory Fees in the Ordinary Course of Business and (II) Banks and Financial Institutions to Honor and Process Checks and Transfers Related thereto [Docket No. 14]*
- X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Deeming Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Adequate Assurance of Payment [Docket No. 15]*
- X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) All Prepetition Employee Obligations and (B) Prepetition Withholding Obligations, and (II) Directing Banks to Honor Related Transfers [Docket No. 16]*

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X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing and to Use Cash Collateral, (B) Granting Liens and Superpriority Claims, (C) Granting Adequate Protection, (D) Modifying the Automatic Stay, (E) Scheduling Final Hearing, and (F) Granting Related Relief [Docket No. 17]*

Dated: March 17, 2025

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

David B. Kurzweil (Ga. Bar No. 430492)

Matthew A. Petrie (Ga. Bar No. 227556)

Terminus 200

3333 Piedmont Road, NE, Suite 2500

Atlanta, Georgia 30305

Telephone: (678) 553-2100

Email: kurzweild@gtlaw.com

petriem@gtlaw.com

*Proposed Counsel for the Debtors and  
Debtors in Possession*

**EXHIBIT A**

**PROPOSED ORDER**

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

In re:

AFH AIR PROS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10356

(Jointly Administered)

**ORDER GRATING COMPLEX CHAPTER 11 BANKRUPTCY CASE  
TREATMENT AND SCHEDULING HEARING ON FIRST DAY MATTERS**

These administratively consolidated bankruptcy cases were filed on March 16, 2025. A *Notice of Designation as Complex Chapter 11 Bankruptcy Case* was filed in each case on the day each case was filed. A *Request for Expedited Consideration of Certain First Day Matters* was filed in this main case on March 17, 2025 [Docket No. \_\_\_\_], requesting expedited consideration of certain matters. After review of the initial pleadings filed in this case, the Court concludes that these cases appear to constitute a Complex Chapter 11 Case. Accordingly, unless the Court orders otherwise,

IT IS ORDERED:

- I. This Case shall proceed in accordance with the Procedures for Complex Chapter 11 Cases pursuant to the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023, as amended;

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<sup>1</sup> The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the proposed claims and noticing agent at <https://www.veritaglobal.net/AirPros>. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Plantation, Florida 33020.

II. The *Request for Expedited Consideration of Certain First Day Matters* is GRANTED. A hybrid hearing<sup>2</sup> will be held before the Court on the **18th day of March, 2025 at 1:00 p.m. ET in the 2nd Floor Courtroom, in the Lewis R. Morgan Federal Building and United States Courthouse, 18 Greenville Street, Newnan, Georgia 30263** (the “Hearing”), to consider the following First Day Matters:

X *Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors (A) to Prepare and Maintain a Consolidated Master List of Creditors in Lieu of Submitting a Formatted Mailing Matrix for Each Debtor, (B) to Redact Personally Identifiable Information for Individual Creditors and Parties in Interest, and (C) to Provide Electronic Notice to Individual Customers and Maintain a Confidential Customer Service List [Docket No. 7]*

X *Emergency Motion of the Debtors for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 9]*

X *Emergency Application of the Debtors for Entry of an 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 [Docket No. 10]*

X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Maintenance of Bank Accounts and Continued Use of Existing Business forms and Checks, (II) Authorizing the Continued Use of Cash Management System, (III) Waiving Certain Investment and Deposit Guidelines, (IV) Authorizing the Debtors to Maintain Corporate Card Program and Honor Prepetition Obligations Related thereto, and (V) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. 11]*

X *Emergency Motion of the Debtors for Entry of an Order Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 12]*

X *Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies, Pay All Policy Premiums, and Renew or Enter Into New Policies, and (B) Continue*

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<sup>2</sup> Parties may attend the Hearing in-person in the **2nd Floor Courtroom, in the Lewis R. Morgan Federal Building and United States Courthouse, 18 Greenville Street, Newnan, Georgia 30263** or virtually via **Judge Baisier’s Virtual Hearing Room**. The link for the Virtual Hearing Room can be found on Judge Baisier’s webpage at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier> and is best used on a desktop or laptop computer but may be used on a phone or tablet. Participants’ devices must have a camera and audio. You may also 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](http://www.ganb.uscourts.gov). Please review “Instructions for Appearing by Telephone and Video Conference” located under the “Hearing Information” tab on the judge’s webpage prior to the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position unless you are speaking or until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge’s webpage.

*Insurance Premium Financing Program, Pay Insurance Premium Financing Obligations Arising in Connection therewith, and Renew Such Premium Financing Arrangements; (II) Authorizing the Debtors to Maintain and Continue their Surety Bond Program, Pay Obligations in Connection therewith, and Renew or Obtain New Surety Bonds; and (III) Authorizing Banks to Honor and Process Checks and Electronic Transfer Requests Related thereto [Docket No. 13]*

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III. Debtors' counsel will promptly today serve a copy of this Order via e-mail on the parties listed on the Consolidated List of Creditors That Have the Thirty Largest Unsecured Claims and Are Not Insiders, and on counsel for the Prepetition Secured Parties (as defined by the Debtors' in their pleadings).

IV. Copies of the First Day Matters shall be made available as follows: (a) upon written request to the Debtors' proposed counsel of record; (b) at the website of the Debtors' proposed claims and noticing agent, <https://www.veritaglobal.net/AirPros>; (c) by using the "Submit an Inquiry" option on the Debtors' proposed claims and noticing agent website at <https://www.veritaglobal.net/AirPros/inquiry>; and/or (d) in the Office of the Clerk, U.S. Bankruptcy Court between 8:00 a.m. and 4:00 p.m. or online anytime at <http://ecf.ganb.uscourts.gov> (registered users) or at <http://pacer.psc.uscourts.gov> (unregistered users). No further notice shall be required.

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*Prepared and presented by:*

**GREENBERG TRAURIG, LLP**

*/s/ David B. Kurzweil*

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David B. Kurzweil (Ga. Bar No. 430492)

Matthew A. Petrie (Ga. Bar No. 227556)

Terminus 200

3333 Piedmont Road, NE, Suite 2500

Atlanta, Georgia 30305

Telephone: (678) 553-2100

Email: kurzweild@gtlaw.com

petriem@gtlaw.com

*Proposed Counsel for the Debtors and  
Debtors in Possession*



**Distribution List**

Andrew D.J. Hede, Chief Restructuring Officer  
AFH Air Pros, LLC  
150 S. Pine Island Road, Suite 200  
Plantation, Florida 33324

David B. Kurzweil  
Greenberg Traurig, LLP  
Terminus 200  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305

Matthew A. Petrie  
Greenberg Traurig, LLP  
Terminus 200  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305

Evan J. Gershbein  
KCC/Verita Global, LLC  
222 N. Pacific Coast Highway, 3<sup>rd</sup> Floor  
El Segundo, CA 90245

R. Jeneane Treace, Assistant U.S. Trustee  
Office of the United States Trustee  
75 Ted Turner Drive, S.W., Room 362  
Atlanta, GA 30303