

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

IN RE:

AFH AIR PROS, LLC, *et al.*,

DEBTORS.

CHAPTER 11

CASE NO. 25-10356-PMB

(Jointly Administered)

**CONSENT TO WITHDRAWAL AS COUNSEL**

**COMES NOW**, Despedida Holdings, Inc. (“Despedida”) and Zerimar 1500, LLC (“Zerimar,” collectively with Despedida and Zerimar, “Clients”), pursuant to BLR 9010-5(c), and hereby consent to the withdrawal of their counsel of record – Gus H. Small., Esq. and Anna M. Humnicky, Esq. (“Counsel”). Despedida is a member of the Official Committee of Unsecured Creditors.

The following notice has been provided to Clients in accordance with BLR 9010-5(b)(1):

(A) Clients consent to Counsel withdrawing and Counsel requested permission to file this consent;

(B) The style of the Chapter 11 bankruptcy case, jointly administered with other Chapter 11 cases, which involve Clients, is as captioned above. The pending matters at this time which Clients may have an interest in are:

- 1) Objection deadline for various first day motions and interim orders on



first day motions, as well as bid procedure for sale of assets<sup>1</sup>, at 4:00 P.M., April 7, 2025;

2) Objection deadline for certain of Debtors' professionals' applications to employ on April 14, 2025;

3) Objection deadline for Debtors' motion to approve key employee retention plan and to pay professionals in the ordinary course of business, on April 17, 2025;

4) Objection deadline for certain of Debtors' professionals' applications to employ on April 21, 2025;

5) Final hearings on various first day motions and bid procedures on April 14, 2025, at 10:00 A.M. in 2<sup>nd</sup> Floor Courtroom, Lewis R. Morgan Federal Building & U.S. Courthouse 18 Greenville Street, Newnan, GA 30263; and

6) Hearings on Nos. 2, 3 and 4, if objections timely filed, on April 23, 2025, at 1:00 PM, in 2<sup>nd</sup> Floor Courtroom, Lewis R. Morgan Federal Building & U.S. Courthouse 18 Greenville Street, Newnan, GA 30263.

Counsel for Debtors (movant/applicant/filer for each) is and may be contacted as follows:

David B. Kurzweil  
Greenberg Traurig, LLP  
Terminus 200 - Suite 2500, 3333 Piedmont Road, NE  
Atlanta, GA 30305  
Phone: 678-553-2100  
LEAD ATTORNEY; Assigned: 03/17/25;  
Email: kurzweild@gtlaw.com

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<sup>1</sup> Bid procedure deadline is not court ordered, therefore, it is not bidding.

The Clerk of Court may be contacted at:

Clerk, U.S. Bankruptcy Court  
United States Courthouse  
Lewis R. Morgan Federal Building & U.S. Courthouse  
18 Greenville Street  
Newnan, GA 30263  
Telephone: (678) 423-3000

(C) The Bankruptcy Court retains jurisdiction of the cases and the matters listed above.

(D) Based on the consensual withdrawal:

(1) Pursuant to Clients' obligation to promptly file with the Bankruptcy Court, at the address listed above, and mail to the parties listed above, Clients by signing this statement, are filing and serving a written statement showing:

(A) the name of the matter listed above which involves Clients; and

(B) Clients' current telephone number, mailing address, is as follows:

Despedida Holdings, Inc., and Zerimar 1500, LLC  
c/o Mr. Jose Ramirez  
19033 SE Jupiter River Drive  
Jupiter, FL 33458  
561-7199269 (Work)  
Email - [jzerrimar7@gmail.com](mailto:jzerrimar7@gmail.com)

Florida Counsel:

William E. Pruitt, Esq.  
PRUITT & PRUITT, P. A.  
2475 Mercer Ave., Suite 101  
West Palm Beach, Florida 33401  
(561) 655-8080 Ex. 103  
(561) 655-4134 (Fax)  
Email - [wep@pruittpruittlaw.com](mailto:wep@pruittpruittlaw.com)

and that they will promptly amend the statement if Clients' telephone number or mailing address changes,

(2) Clients will have the obligation to respond to any discovery or motions, to take other actions as are appropriate or required, and to prepare for any trial or hearing that may be scheduled in any matter, or to hire other counsel to do so;

(3) The failure or refusal of Clients to meet these obligations may result in adverse consequences to Clients;

(4) Service of notices, pleadings, and other papers may be made upon Clients at their last known addresses as listed in No. 1(B) above; and

(5) Clients are an incorporated company and a limited liability company and, as such, the entities may only be represented in the Bankruptcy Court by an attorney, an attorney must sign all pleadings submitted to the Bankruptcy Court, an officer may not represent the entities in the Bankruptcy Court unless that officer is also an attorney, and failure to comply with this rule could result in adverse consequences to the entities;

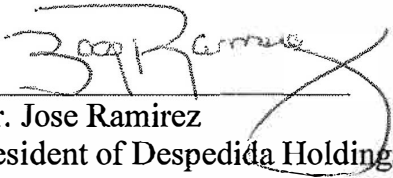
(E) The dates of the hearings for the matters in which Clients may have an interest are listed above and that the holding of such hearings or trials and any deadlines will not be affected by the withdrawal of counsel.

(F) Clients' current mailing address is Despedida Holdings, Inc., and Zerimar 1500, LLC, c/o Mr. Jose Ramirez, 19033 SE Jupiter River Drive, Jupiter, FL 33458 561-7199269 (Work), Email - [jzerrimar7@gmail.com](mailto:jzerrimar7@gmail.com). Florida Counsel: William E.

Pruitt, Esq., PRUITT & PRUITT, P. A., 2475 Mercer Ave., Suite 101, West Palm Beach, Florida 33401, (561) 655-8080 Ex. 103, (561) 655-4134 (Fax), [wep@pruittpruittlaw.com](mailto:wep@pruittpruittlaw.com). Clients acknowledge and agree that they will update the Court and the parties if their information changes in the future before the closing of the case.

Dated: April 8, 2025.

Consented to by:

  
Mr. Jose Ramirez  
President of Despedida Holdings, Inc.  
Sole Member/Manager of Zerimar 1500, LLC

Consented to by:

/s/ Anna M. Humnicky  
Gus H. Small  
Georgia Bar No. 653200  
Anna M. Humnicky  
Georgia Bar No. 377850  
Small Herrin, LLP  
100 Galleria Parkway, Suite 350  
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CASE NO. 25-10356-PMB

(Jointly Administered)

**CERTIFICATE OF SERVICE**

I, Anna M. Humnicky, certify that I am over the age of 18 and that on April 8, 2025, I filed and served copies of the *Consent to Request for Withdrawal as Counsel* by using the Bankruptcy Court's Electronic Case Filing program which sends a notice of the above-listed document and an accompanying link to the document to the parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program, as indicated in Exhibit "A," and by First Class U.S. Mail, as indicated in Exhibit "A."

Dated: April 8, 2025

By: /s/ Anna M. Humnicky  
Anna M. Humnicky  
Georgia Bar No. 377850

100 Galleria Parkway  
Suite 350  
Atlanta, GA 30339  
(P) 770-857-4770  
[ahumnicky@smallherrin.com](mailto:ahumnicky@smallherrin.com)

**EXHIBIT A**

*Via CM/ECF –*

Jonathan S. Adams on behalf of U.S. Trustee Office of the United States Trustee

jonathan.s.adams@usdoj.gov

Danielle Barav-Johnson on behalf of Creditor Columbia Home Services LLC

dahnibarav-johnson@eversheds-sutherland.com

Jason B. Binford on behalf of Creditor Resources Connection LLC

jbinford@krcl.com

Heather D. Brown on behalf of Creditor Heat Transfer Systems of Georgia, LLC

heather@hdbrownlaw.com

Christopher K. Coleman on behalf of Interested Party East Coast Mechanical Home Services LLC

christopher.coleman@kslaw.com

Jeff Dutson on behalf of Interested Party East Coast Mechanical Home Services LLC

jdutson@kslaw.com

Ebba Gebisa on behalf of Creditor OCIII LVS LXI LP

ebba.gebisa@lw.com, christopher.tarrant@lw.com;ebba-gebisa-1560@ecf.pacerpro.com

Tara L. Grundemeier on behalf of Creditor Cypress-Fairbanks ISD

Tara.Grundemeier@lgbs.com,

Monica.Herrera@lgbs.com;Houston\_bankruptcy@lgbs.com

Tara L. Grundemeier on behalf of Creditor Harris Co ESD #09

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David B. Kurzweil on behalf of Debtors

kurzweild@gtlaw.com, brattons@gtlaw.com

Cameron M. McCord on behalf of Interested Party Apex Service Partners

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pineyro@joneswalden.com;bdernus@joneswalden.com

Cameron M. McCord on behalf of Interested Party Hansen Super Techs, LLC

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pineyro@joneswalden.com;bdernus@joneswalden.com

Cameron M. McCord on behalf of Interested Party Southern Air of Thibodaux, LLC

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pineyro@joneswalden.com;bdernus@joneswalden.com

Mark A. Mintz on behalf of Creditor 30590 LA16, LLC

mmintz@joneswalker.com, hstewart@joneswalker.com

Mark A. Mintz on behalf of Creditor Doug's Service Company f/k/a Doug's Refrigeration and Air Conditioning, Inc.

mmintz@joneswalker.com, hstewart@joneswalker.com

Mark A. Mintz on behalf of Creditor Dream Team Services, LLC.

mmintz@joneswalker.com, hstewart@joneswalker.com

Mark A. Mintz on behalf of Creditor Baylie Annison

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Mark A. Mintz on behalf of Creditor Jeffrey D. Tauzin

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Mark A. Mintz on behalf of Creditor Trey Annison

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Office of the United States Trustee

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Matthew Petrie on behalf of Debtor AFH Air Pros, LLC

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John Kendrick Turner on behalf of Creditor Dallas County

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John Kendrick Turner on behalf of Creditor Tarrant County

john.turner@lgbs.com

David Wender on behalf of Creditor Columbia Home Services LLC

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J. Robert Williamson on behalf of Creditor Alter Domus (US) LLC

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J. Robert Williamson on behalf of Creditor OCIII LVS LXI LP

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centralstation@swlawfirm.com;aray@swlawfirm.com;hkepner@swlawfirm.com;fharris@swlawfirm.com;mlevin@swlawfirm.com

*Via U.S. Mail –*

Despedida Holdings, Inc., and Zerimar 1500, LLC  
c/o Mr. Jose Ramirez  
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