

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> <p>Related to Docket Nos. 11,12,13,14,15,16,17,34</p>
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**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR HEARING ON APRIL 14, 2025 AT 10:00 A.M. (ET)**

**Time and Date of Hearing:** April 14, 2025 at 10:00 a.m. (prevailing Eastern Time)

**Location of In-Person Hearing:** The Honorable Paul M. Baisier  
United States Bankruptcy Court for the  
Northern District of Georgia  
**Richard B. Russell Federal Building and  
United States Courthouse  
Courtroom 1202  
75 Ted Turner Drive, SW  
Atlanta, GA 30303**

**Location of Virtual Hearing:** Parties participating in the hearing virtually may do so by using the following link:

<https://www.zoomgov.com/j/1617069079?pwd=WG16TGpyM1Z6dFZ6YVlrUkZwQ2RiZz09>

Phone Number: 833-568-8864

Meeting ID: 161 706 9079

<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 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, Suite 200, Plantation, Florida 33324.

<sup>2</sup> **Amended items appear in bold.**



**Copies of Pleadings:**

A copy of each pleading can be viewed on the Court's website at [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov) and the website of the Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC dba Verita Global, at <https://www.veritaglobal.net/AirPros>. Further information may be obtained by using the "Submit an Inquiry" function at <https://www.veritaglobal.net/AirPros/inquiry>.

**ADJOURNED MATTERS**

1. ***DIP Motion.*** 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]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time). Extended for the Committee to April 16, 2025 at 12:00 p.m. (prevailing Eastern Time).

Responses Filed: None.

Related Documents:

- A. Declaration of Jeffrey Finger in Support of the 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. 18]
- B. Interim Order (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. 32]
- C. Certificate of Service of Interim Order [Docket No. 37]

Status: This matter is being adjourned until the hearing scheduled on April 23, 2025 at 1:00 p.m. (prevailing Eastern Time).

**UNCONTESTED MATTERS GOING FORWARD**

2. ***Cash Management Motion.*** 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 Purchasing Card Program and Honor Prepetition

Obligations Related Thereto, and (V) Granting Administrative Expense Status to Postpetition Intercompany Claims [Docket No. 11]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time). Extended to April 10, 2025 at 12:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed: None.

Related Documents:

- A. Interim Order (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. 31]
- B. Certificate of Service of Interim Order [Docket No. 37]
- C. Notice of Filing Modified Proposed Final Order (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. 143]

Status: This matter is going forward on an uncontested basis.

- 3. ***Customer Programs Motion.*** 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]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed: None

Related Documents:

- A. Interim Order Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business, and Setting a Final Hearing for April 14, 2025 [Docket No. 40]
- B. Certificate of Service of Interim Order [Docket No. 51]
- C. Notice of Filing Modified Proposed Final Order Authorizing the Debtors to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 144]

Status: This matter is going forward on an uncontested basis.

4. ***Insurance Motion.*** 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 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]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed: None

Related Documents:

- A. Interim Order (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 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, and Setting a Final Hearing for April 14, 2025 [Docket No. 42]
- B. Certificate of Service of Interim Order [Docket No. 51]
- C. Notice of Filing Modified Proposed Final Order (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 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. 146]

Status: This matter is going forward on an uncontested basis.

5. ***Taxes Motion.*** 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]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed: None

Related Documents:

- A. Interim 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, and Setting a Final Hearing for April 14, 2025 [Docket No. 43]
- B. Certificate of Service of Interim Order [Docket No. 51]
- C. Notice of Filing Modified Proposed Final 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. 147]

Status: This matter is going forward on an uncontested basis.

6. ***Utilities Motion.*** 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]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed: None

Related Documents:

- A. Interim Order (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, and Setting a Final Hearing for April 14, 2025 [Docket No. 44]
- B. Certificate of Service of Interim Order [Docket No. 51]
- C. Notice of Filing Modified Proposed Final Order (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. 148]

Status: This matter is going forward on an uncontested basis.

7. ***Wages and Benefits Motion.*** Emergency Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) All Prepetition Employee Obligations and Dues and (B) Prepetition Withholding Obligations, and (II) Directing Banks to Honor Related Transfers [Docket No. 16]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time)

Responses Filed: None

Related Documents:

- A. Interim Order (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. 30]
- B. Certificate of Service of Interim Order [Docket No. 37]
- C. Notice of Filing Modified Proposed Final Order (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. 150]

Status: This matter is going forward on an uncontested basis.

8. ***Bidding Procedures Motion.*** Motion of the Debtors for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of the Debtors' Assets, (B) Approving the Debtors' Entry into the Stalking Horse Purchase Agreements and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief; and (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 34]

Response Deadline: April 7, 2025 at 4:00 p.m. (prevailing Eastern Time). Extended to April 10, 2025 at 12:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed: The Debtors received informal comments from the Committee and the U.S. Trustee, which are addressed in the modified proposed order. No other responses or formal objections were received or filed.

Related Documents:

- A. Declaration of Jeffrey Finger in Support of the Debtors' Bidding Procedures Motion [Docket No. 35]
- B. Certificate of Service of Dockets Nos. 34, 35 [Docket No. 46]

- C. Amendment To: Motion of the Debtors for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of the Debtors' Assets, (B) Approving the Debtors' Entry into the Stalking Horse Purchase Agreements and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief; and (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 55]
- D. Amended Declaration of Jeffrey Finger in Support of the Debtors' Bidding Procedures Motion [Docket No. 56]
- E. Certificate of Service of Dockets Nos. 55, 56 [Docket No. 73]
- F. Declaration of Andrew D.J. Hede in Support of the Debtors' Bidding Procedures Motion [Docket No. 158]
- G. Notice of Filing Modified Proposed Order (I)(A) Establishing Bidding Procedures Relating to the Sale of the Debtors' Assets, (B) Approving the Debtors' Entry into the Stalking Horse Purchase Agreements and Related Bid Protections, (C) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Approving Form and Manner of Notices Relating Thereto, (E) Scheduling a Hearing to Consider the Proposed Sale, and (F) Granting Related Relief; and (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Docket No. 159]
- H. **Notice of Filing Amendment to Air Pros Legacy Stalking Horse Purchase Agreement [Docket No. 172]**

Status: This matter is going forward on an uncontested basis.

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Dated: April 11, 2025

Respectfully submitted,

**GREENBERG TRAUIG, LLP**

*/s/ David B. Kurzweil*

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