

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

In re:

AFH AIR PROS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10356 (PMB)

(Jointly Administered)

Related to Docket No. 58

**NOTICE OF FILING OF MODIFIED PROPOSED ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF
GREENBERG TRAURIG, LLP AS COUNSEL FOR THE DEBTORS AND
DEBTORS IN POSSESSION, NUNC PRO TUNC TO THE PETITION DATE**

PLEASE TAKE NOTICE that, on March 21, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date* [Docket No. 58] (the “Application”). A proposed form of order was attached to the Application as Exhibit A (the “Initial Proposed Order”).

PLEASE TAKE FURTHER NOTICE that pursuant to the Notice of Hearing [Docket No. 71] (the “Notice”), objections to approval of the Application were due by April 14, 2025, at 4:00 p.m. (prevailing Eastern Time). No objections or responses were filed on the docket or received by the Debtors.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a revised proposed order granting the Application (the “Modified Proposed Order”), which includes certain clarifying edits and modifications consistent with the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a blackline reflecting the modifications between the Initial Proposed Order and the Modified Proposed Order.

PLEASE TAKE FURTHER NOTICE that, because no objections or responses to the Application were received by the deadline set forth under the Notice, the Debtors respectfully

¹ 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.



request that the Court enter the Revised Proposed Order at its earliest convenience. Counsel is available at the request of the Court.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in the above captioned chapter 11 cases are available free of charge by visiting the case website maintained by the Debtors' notice and claims agent, Kurtzman Carson Consultants, LLC dba Verita Global, at <https://www.veritaglobal.net/AirPros> or by calling (866) 927-7076. You may also obtain copies of any pleadings by visiting the Office of the Clerk, U.S. Bankruptcy Court for the Northern District of Georgia (Newnan Division) between 8:00 a.m. and 4:00 p.m. or online by visiting the Court's website at <http://ecf.ganb.uscourts.gov> (registered users) or at <http://pacer.psc.uscourts.gov> (unregistered users). Further information may be obtained by using the "Submit an Inquiry" function at <https://www.veritaglobal.net/AirPros/inquiry>.

Dated: April 16, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ David B. Kurzweil

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

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

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*Proposed Counsel for the Debtors and
Debtors in Possession*

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2025, all ECF participants registered in these Chapter 11 Cases were served electronically with the foregoing notice through the Court's ECF system at their respective email addresses registered with this Court.

By: /s/ David B. Kurzweil

David B. Kurzweil

Exhibit A

(Modified Proposed Order)

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

In re:

AFH AIR PROS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10356 (PMB)

(Joint Administration Requested)

Re: Docket No. 58

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
GREENBERG TRAURIG, LLP AS COUNSEL FOR THE DEBTORS AND
DEBTORS IN POSSESSION, *NUNC PRO TUNC* TO THE PETITION DATE**

Upon the *Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date* [Docket No. 58] (the “Application”);² and upon the *Declaration of David B. Kurzweil in Support of Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date*, attached to the Application as **Exhibit B** (the “Kurzweil Declaration”) and the *Declaration of Andrew D.J. Hede in Support of Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date*, attached to the Application as **Exhibit C** (the “Hede Declaration”); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Second*

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases, dated February 6, 2023 (the “Complex Case Procedures”); and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b) and this Court having jurisdiction to enter a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court being satisfied based on the representations made in the Application and in the Kurzweil Declaration that (a) Greenberg Traurig does not hold or represent an interest adverse to the Debtors’ estates and (b) Greenberg Traurig is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code as modified by section 1107(b) of the Bankruptcy Code, and as required by section 327(a) of the Bankruptcy Code; and due and sufficient notice of the Application and (i) the opportunity to object to relief requested in the Application by April 14, 2025 at 4:00 p.m. (prevailing Eastern Time) and (ii) the hearing on the Application scheduled for April 23, 2025 at 1:00 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the *Third Amended and Restated General Order No. 24-2018*; and no hearing is necessary on the Application absent the filing of an objection with respect to the same; and the Court having considered the Application and all other matters of record, including the lack of objection thereto; and based on the foregoing, no further notice or hearing is required; and this Court having found that the relief requested in the Application is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and it appearing that proper and adequate notice of the Application has been given and that no other or further notice is necessary; and after due deliberation thereon; and this Court having reviewed the Application and having heard statements in support of the Application at a hearing held before this Court; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED to the extent provided herein.
2. The terms of the Engagement Letter are approved in all respects, including without limitation, the rates of Greenberg Traurig professionals set forth therein and in the Application.
3. The Debtors are authorized, pursuant to sections 327(a), 328(a) and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b), and 5002, and the Complex Case Procedures, to retain and employ Greenberg Traurig as counsel to the Debtors in the above-captioned Chapter 11 Cases upon the terms and conditions as set forth in the Application *nunc pro tunc* to the Petition Date.
4. Greenberg Traurig shall be compensated in accordance with the procedures set forth in the Application, sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, Local Rules of the United States Bankruptcy Court for the Northern District of Georgia, the Complex Case Procedures, and further Orders of this Court.
5. To the extent the Application or the Engagement Letter is inconsistent with this Order, the terms of this Order shall govern.
6. Notwithstanding any Bankruptcy Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.
7. Any Cost Advance Balance held by Greenberg Traurig shall be applied to costs incurred by Greenberg Traurig prior to the Petition Date.
8. Greenberg Traurig will make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Revised

UST Guidelines”), both in connection with this Application and the interim and final fee applications to be filed by Greenberg Traurig in these Chapter 11 Cases.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

10. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

11. Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC, dba Verita Global, as the Debtors’ claims and noticing agent (the “Claims and Noticing Agent”), shall, within three days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and the Claims and Noticing Agent shall file promptly thereafter a certificate of service confirming such service.

END OF DOCUMENT

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ David B. Kurzweil

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

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

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*Proposed Counsel for the Debtors and
Debtors in Possession*

Exhibit B

(Blackline)

IN THE UNITED STATES BANKRUPTCY COURT
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Chapter 11

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Re: Docket No. ~~—~~[58](#)

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Upon the *Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date* [\[Docket No. 58\]](#) (the “Application”);² and upon the *Declaration of David B. Kurzweil in Support of Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date*, attached to the Application as **Exhibit B** (the “Kurzweil Declaration”) and the *Declaration of Andrew D.J. Hede in Support of Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors in Possession, Nunc Pro Tunc to the Petition Date*, attached to the Application as **Exhibit C** (the “Hede Declaration”); and ~~upon the statements of counsel in support of the relief requested in~~

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

~~the Application at the hearing before~~ the Court; ~~and the Court~~ having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”); and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b) and this Court having jurisdiction to enter a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and ~~it appearing that proper and adequate notice of the Application has been given and that no other or further notice is necessary; and~~ this Court being satisfied based on the representations made in the Application and in the Kurzweil Declaration that (a) Greenberg Traurig does not hold or represent an interest adverse to the Debtors’ estates and (b) Greenberg Traurig is a “disinterested person” as defined in section 101(14) of the Bankruptcy Code as modified by section 1107(b) of the Bankruptcy Code, and as required by section 327(a) of the Bankruptcy Code; and due and sufficient notice of the Application and (i) the opportunity to object to relief requested in the Application by April 14, 2025 at 4:00 p.m. (prevailing Eastern Time) and (ii) the hearing on the Application scheduled for April 23, 2025 at 1:00 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the Third Amended and Restated General Order No. 24-2018; and no hearing is necessary on the Application absent the filing of an objection with respect to the same; and the Court having considered the Application and all other matters of record, including the lack of objection thereto; and based on the foregoing, no further notice or hearing is required; and this Court having found that the relief requested in the Application is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and it appearing that proper and adequate notice of the Application

has been given and that no other or further notice is necessary; and after due deliberation thereon; and this Court having reviewed the Application and having heard statements in support of the Application at a hearing held before this Court; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED to the extent provided herein.
2. The terms of the Engagement Letter are approved in all respects, including without limitation, the rates of Greenberg Traurig professionals set forth therein and in the Application.
3. The Debtors are authorized, pursuant to sections 327(a), 328(a) and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b), and 5002, and the Complex Case Procedures, to retain and employ Greenberg Traurig as counsel to the Debtors in the above-captioned Chapter 11 Cases upon the terms and conditions as set forth in the Application *nunc pro tunc* to the Petition Date.
4. Greenberg Traurig shall be compensated in accordance with the procedures set forth in the Application, sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, Local Rules of the United States Bankruptcy Court for the Northern District of Georgia, the Complex Case Procedures, and further Orders of this Court.
5. To the extent the Application or the Engagement Letter is inconsistent with this Order, the terms of this Order shall govern.
6. Notwithstanding any Bankruptcy Rule to the contrary, this Order shall be immediately effective and enforceable upon its entry.
7. Any Cost Advance Balance held by Greenberg Traurig shall be applied to costs

incurred by Greenberg Traurig prior to the Petition Date.

8. Greenberg Traurig will make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Revised UST Guidelines"), both in connection with this Application and the interim and final fee applications to be filed by Greenberg Traurig in these Chapter 11 Cases.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

10. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and/or interpretation of this Order.

~~11. Any party in interest shall have 21 days from the service of this Order to file an objection to the Application and/or the relief provided in this Order.~~

~~12. If an objection is timely filed, counsel for the Debtors will set the Application and all such objections for hearing pursuant to the Court's Open Calendar Procedures.~~

~~13. If no objection to this Order is timely filed, this Order shall be a final Order approving the Application.~~

11. ~~14.~~ Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC, dba Verita Global, as the Debtors' claims and noticing agent (the "Claims and Noticing Agent"), shall, within three days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and the Claims and Noticing Agent shall file promptly thereafter a certificate of service confirming such service.

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