

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)

**MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER
(I) FIXING DEADLINES FOR FILING PROOFS OF CLAIM AND
(II) APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), submit this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), pursuant to sections 105, 501, 502, 503, and 1111(a) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), and Rules 2002 and 3003(c)(3) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), fixing the deadlines for filing proofs of claim (each, a “Proof of Claim”) in the Chapter 11 Cases (as defined below) and approving the form and manner of notice thereof. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a

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.



core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 105, 501, 502, 503, and 1111(a) of the Bankruptcy Code, and Bankruptcy Rules 2002 and 3003(c)(3).

BACKGROUND

3. On March 16, 2025 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On March 31, 2025, the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [D.I. 111].

6. Additional information regarding the Debtors’ businesses, capital structure, and the circumstances leading to the filing of these Chapter 11 Cases is set forth in the *Declaration of Andrew D.J. Hede in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 8] (the “First Day Declaration”).

RELIEF REQUESTED

7. The Debtors respectfully request entry of the Proposed Order establishing deadlines for filing Proofs of Claim in these Chapter 11 Cases and approving the form and manner of notice thereof, as follows:

- a) establishing **June 13, 2025 at 5:00 p.m. (prevailing Eastern Time)** (the “General Bar Date”), as the deadline for all persons and entities,² other than governmental

² As used herein, the terms “person” and “entity” shall have the meanings ascribed to such terms in sections 101(41) and 101(15) of the Bankruptcy Code, respectively.

units,³ holding a claim against any of the Debtors arising (or deemed to arise) on or before the Petition Date, including claims arising under section 503(b)(9) of the Bankruptcy Code, to file Proofs of Claim in the Chapter 11 Cases;

- b) establishing **September 12, 2025 at 5:00 p.m. (prevailing Eastern Time)** (the “Governmental Bar Date”), as the deadline for governmental units holding a claim against any of the Debtors arising (or deemed to arise) on or before the Petition Date to file Proofs of Claim in the Chapter 11 Cases;
- c) establishing the later of (i) the General Bar Date, (ii) thirty (30) days after the effective date of rejection of any unexpired lease or executory contract of any of the Debtors as provided by an order of the Court or (iii) such other date, if any, as the Court may fix in the order authorizing such rejection (the “Rejection Damages Bar Date” and, collectively with the General Bar Date, and the Governmental Bar Date, the “Bar Dates”), as the deadline for filing a Proof of Claim for any rejection damages arising from the rejection of any unexpired lease or executory contract of any of the Debtors; provided, however, that any such counterparty holding a claim on account of any executory contract or unexpired lease arising (or deemed to arise) on or before the Petition Date shall be required to file a Proof of Claim by the General Bar Date; and
- d) granting related relief.

8. The Debtors filed their respective Schedules of Assets and Liabilities (collectively, the “Schedules”). If any Debtor amends or supplements its respective Schedules after the Bar Date Notice (as defined below) is served, the Debtors shall give notice of any amendment or supplement to the holders of claims affected thereby within fourteen (14) days thereof, and such holders, as set forth in any such notice, shall have until the later of (a) the General Bar Date or, if the creditor is a governmental unit, the Governmental Bar Date, and (b) twenty-one (21) days from the date of service of such notice to file a proof of claim or be barred from so doing (the “Amended Schedules Bar Date”).

9. The Debtors further seek approval of the Debtors’ proposed notice of the Bar Dates (the “Bar Date Notice”), substantially in the form attached to the Proposed Order as **Exhibit 1**.

³ As used herein, the term “governmental unit” shall have the meaning ascribed to such term in section 101(27) of the Bankruptcy Code.

Based upon the procedures set forth below, the proposed Bar Dates will give all creditors ample notice and opportunity to file Proofs of Claim.

10. With the assistance of the Debtors' claims agent, Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the Debtors have prepared the form for filing Proofs of Claim attached to the Proposed Order as **Exhibit 2** (the "Proof of Claim Form"), which substantially conforms to Official Form B410 but is tailored to these Chapter 11 Cases.⁴ The modifications to Official Form B410 proposed by the Debtors include listing all of the Debtors and their respective case numbers at the top of the Proof of Claim Form, allowing creditors to assert claims arising under section 503(b)(9) of the Bankruptcy Code and adding certain instructions.⁵ In addition, the Proof of Claim Form may be customized for each creditor whose claim is listed on the Schedules with the creditor's name, address, and/or information regarding the nature, amount, and status of its claim(s) as reflected in the Schedules.

PROPOSED PROCEDURES FOR SUBMITTING PROOFS OF CLAIM

A. Parties Required to Submit a Proof of Claim

11. Except as otherwise set forth herein, the Debtors propose that the following entities holding claims against any of the Debtors arising (or deemed to arise) prior to the Petition Date be required to file a Proof of Claim on or before the applicable Bar Date:

- a) any entity whose claim against the Debtors is not listed in the Debtors' Schedules or is listed as "contingent," "unliquidated," or "disputed" and if such entity desires to participate in these Chapter 11 Cases or share in any distribution in these Chapter 11 Cases;

⁴ Official Bankruptcy Form B410 can also be found at <http://www.uscourts.gov/forms/bankruptcy-forms>. The customized Proof of Claim Form can be obtained on the Verita website established for these Chapter 11 Cases, <https://www.veritaglobal.net/AirPros>.

⁵ The Proof of Claim form is substantially in the form of Official Bankruptcy Form 410, but has been modified, and may be further modified in certain limited respects, to accommodate the claims process in the Chapter 11 Cases.

- b) any entity that believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount, and who desires to have its claim allowed in a different classification or amount other than that identified in the Schedules;
- c) any entity that believes its prepetition claims as listed in the Schedules is not an obligation of the specific Debtor against which the claim is listed and that desires to have its claim allowed against a Debtor other than that identified in the Schedules;
- d) any entity that asserts an administrative priority claim under section 503(b)(9) of the Bankruptcy Code;
- e) any person or entity who asserts a claim arising from the rejection of an executory contract or unexpired lease of the Debtors and has not previously filed any such claim; provided, however, that any such counterparty holding a claim on account of any executory contract or unexpired lease arising (or deemed to arise) on or before the Petition Date shall be required to file a Proof of Claim by the General Bar Date
- f) any person or entity who asserts a priority claim under section 502(f) of the Bankruptcy Code; and
- g) any person or entity who asserts a claim arising from or relating to pending or threatened litigation against any of the Debtors.

12. For the avoidance of doubt, all persons and entities asserting a claim against more than one Debtor must file a separate claim for each such Debtor on or before the applicable Bar Date associated with such claim.

B. Consequences of Failure to File a Proof of Claim

13. The Debtors propose that any person or entity that is required to file a Proof of Claim in the form and manner specified in the Bar Date Order that fails to do so on or before the applicable Bar Date: (a) will be forever barred, estopped, and enjoined from asserting such claim against the Debtors, their estates, or the property of the estates, or thereafter filing a Proof of Claim with respect thereto in the Chapter 11 Cases; (b) will not, with respect to such claim, be treated as a creditor of the Debtors for the purpose of voting upon any plan in these proceedings; and (c) will

not receive or be entitled to receive any payment or distribution of property from the Debtors or their successors or assigns with respect to such claim.

C. Parties Not Required to Submit a Proof of Claim

14. The Debtors propose that the following entities whose claims otherwise would be subject to a Bar Date need not file Proofs of Claim:

- a) any entity that already has filed a signed Proof of Claim against the Debtors with the Clerk of the Court or with the Claims in a form substantially similar to Official Form 410;
- b) any entity whose claim is listed against a Debtor in the applicable Debtor's Schedules filed with the Court, or in any supplements or amendments to the Schedules, (i) that is not identified as "contingent," "unliquidated," or "disputed"; and (ii) with respect to which the claimant agrees with the amount, nature, classification, and characterization of the claim as set forth in the Schedules;
- c) any entity whose claim previously has been allowed by order of the Court;
- d) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
- e) pursuant to the *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 a Final Hearing, and (F) Granting Related Relief* [D.I. 32] (the "Interim Order"), and in any final order approving the DIP Facility (as defined in the Interim Order), the Prepetition Secured Parties (as defined in the Interim Order);
- f) any Debtor against any other Debtor;
- g) any holder of an equity interest in the Debtors (each, an "Interest Holder"), which interest is based solely upon the ownership of membership interests, common or preferred stock, warrants, options, or rights to purchase, sell, or subscribe to such a security or interest of the Debtors (an "Interest"); provided, however, that any Interest Holder who wishes to assert a claim against any Debtor, including a claim relating to such equity interest or the purchase, sale, issuance, or distribution of such interest, must file a proof of claim asserting such claim on or prior to the General Bar Date pursuant to procedures set forth herein;
- h) any holder of an administrative expense claim for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, 503(b)(1)-(8), and 507(a)(2) of the Bankruptcy Code;

- i) any claims held by managers, officers, and employees of the Debtors as of the Petition Date for indemnification, contribution, or reimbursement; or
- j) any customer holding a claim or claims under warranties and/or membership agreements,⁶ other than those customers who assert a claim arising from or relating to pending or threatened litigation against any of the Debtors.

D. Requirements for Preparing and Submitting Proofs of Claim

15. The Debtors propose that each Proof of Claim be required to be consistent with the following:

- a. Contents. Each Proof of Claim must: (i) be legible and written in English; (ii) be denominated in lawful currency of the United States; and (iii) conform substantially with the Proof of Claim form or Official Form 410.
- b. Original Signatures Required. Each Proof of Claim other than an electronically submitted Proof of Claim must contain an original signature of the claimant or the claimant's authorized agent or legal representative.
- c. Debtor Name and Case Number. Each Proof of Claim must specify by name and case number against which Debtor the claim is filed. For the avoidance of doubt, all persons and entities asserting a claim against more than one Debtor must file a separate claim for each such Debtor, specifying the name and case number of such Debtor.
- d. Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).
- e. 503(b)(9) Claim. Any Proof of Claim asserting a claim entitled to priority under section 503(b)(9) of the Bankruptcy Code must also: (i) include the value of the goods delivered to and received by the applicable Debtor in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the date such goods were received by the applicable Debtor; (iii) state whether the amount asserted in the proof of claim represents a combination of goods and services and, if applicable, the portion of the claim that relates solely to the value of goods, (iv) identify the particular invoices on which the section 503(b)(9) claim is based, and (v) attach documentation of any reclamation demand made to the applicable Debtor under section 546(c) of the Bankruptcy Code (if applicable).
- f. Timely Filing. Each Proof of Claim (including supporting documentation) must be filed so as to be **actually received**, on or before the applicable Bar Date by either:

⁶ Such applicable warranty and membership agreements of the Debtors are further described as "Customer Programs" in the *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* [D.I. 12].

- (i) filing an electronic Proof of Claim Form (an “Electronic Proof of Claim”) via the electronic interface on the website Verita maintains in these Chapter 11 Cases at <https://www.veritaglobal.net/AirPros>; or (ii) mailing the original Proof of Claim by regular mail to Air Pros Claims Processing Center c/o KCC dba Verita, 222 N. Pacific Coast Hwy., Suite 300, El Segundo, California 90245;
- g. No Facsimile or E-mail. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted.
- h. Receipt of Service. Claimants wishing to receive acknowledgment that their Proofs of Claim were timely received by the Verita must submit (i) a copy of the Proof of Claim (in addition to the original Proof of Claim) and (ii) a self-addressed, stamped envelope.

PROPOSED PROCEDURES FOR PROVIDING NOTICE OF BAR DATES

16. The Debtors intend to mail the (i) Bar Date Notice and (ii) Proof of Claim Form (collectively, the “Bar Date Package”), by first-class mail to all known persons and entities holding potential prepetition claims against the Debtors (other than to customers as further discussed below).⁷

17. The Bar Date Notice will: (a) set forth the Bar Dates; (b) advise creditors under what circumstances they must file a Proof Claim; (c) alert creditors to the consequences of failing to timely file a Proof of Claim, as set forth in Bankruptcy Rule 3003(c)(2) or an order of the Court, as applicable; (d) set forth the addresses to which Proofs of Claim must be sent for filing; and (e) notify creditors that Proofs of Claim (i) must be filed with original signatures (except for an Electronic Proof of Claim), (ii) must be written in English, (iii) must be denominated in lawful currency of the United States, (iv) must attach any documents on which the claim is based or an explanation as to why such documents are not available, and (v) must not be transmitted by facsimile, telecopy, e-mail, or other electronic means (except for an Electronic Proof of Claim), or such forms will not be deemed timely filed. The Debtors submit that the Bar Date Notice will

⁷ The Bar Date Order, the Bar Date Notice and the Proof of Claim Form also will be accessible on the Debtors’ case website: <https://www.veritaglobal.net/AirPros>.

provide creditors with sufficient information to file properly prepared and executed Proofs of Claim in a timely manner.

BASIS FOR RELIEF

18. Bankruptcy Rule 3003(c)(3) generally governs the filing of proofs of claim in chapter 11 cases and provides in relevant part that: “[t]he court shall fix and for cause shown may extend the time within which proofs of claim . . . may be filed.” Fed. R. Bankr. P. 3003(c)(3). Bankruptcy Rule 3002(a) provides that secured and unsecured creditors must file a proof of claim, except as provided in, *inter alia*, Bankruptcy Rule 3003. *See id.* 3002(a). Bankruptcy Rule 3003(c)(2) further provides that any creditor whose claim is not listed in the Schedules, or is listed therein as disputed, contingent, or unliquidated, shall file a proof of claim within the time prescribed by Bankruptcy Rule 3003(c)(3), and that any creditor who fails to file such proof of claim shall not be treated as a creditor with respect to such claim for the purpose of receiving any distribution from the estate. *Id.* 3003(c)(2); *see also* 11 U.S.C. § 1111(a) (“A proof of claim or interest is deemed filed under section 501 of this title for any claim or interest that appears in the schedules filed under section 521(a)(1) or 1106(a)(2) of this title, except a claim or interest that is scheduled as disputed, contingent, or unliquidated.”).

19. Although Bankruptcy Rule 2002(a)(7) generally provides that all parties-in-interest must receive, at a minimum, 21 days’ notice of the time fixed for filing proofs of claim pursuant to Bankruptcy Rule 3003(c), neither the Bankruptcy Code, the Bankruptcy Rules, nor the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia specify a time by which proofs of claim must be filed in chapter 11 cases (other than section 502(b)(9) of the Bankruptcy Code, which provides that governmental units shall have a minimum of 180 days after the entry of the order for relief to file proofs of claim).

20. The Court has authority to grant the relief requested in this Motion in furtherance of Bankruptcy Rule 3003 and under section 105(a) of the Bankruptcy Code, which empowers bankruptcy courts to enter “any order, process, or judgment that is necessary or appropriate” to carry out the provisions of the Bankruptcy Code. *See* 11 U.S.C. § 105(a). It is well recognized that a claims bar date plays an essential role in the two recognized policies of bankruptcy—preserving a debtor’s going-concern value and maximizing property available to satisfy creditors. *See Bank of Am. Nat’l Trust & Sav. Ass’n v. 203 N. LaSalle St. P’ship*, 526 U.S. 434, 453 (1999). A claims bar date allows the debtor and parties-in-interest to expeditiously determine and evaluate the liabilities of the estates. The absence of such a deadline, in contrast, would prolong creditor uncertainty, increase the costs and expenses incurred by debtors in connection with the claims reconciliation process, and delay or even derail the claims process, thus undercutting one of the principal purposes of bankruptcy law—“secur[ing] within a limited period the prompt and effectual administration and settlement of the debtor’s estate.” *Chemetron Corp. v. Jones*, 72 F.3d 341, 346 (3d Cir. 1995).

21. In addition, requiring entities asserting claims pursuant to section 503(b)(9) of the Bankruptcy Code to assert such claims by filing a Proof of Claim on or prior to the General Bar Date will ensure that the Debtors have complete information regarding the nature, validity, and amount of such 503(b)(9) Claims while affording parties asserting 503(b)(9) Claims appropriate and adequate notice. This approach facilitates a more cost-effective and efficient claims process for such creditors and helps conserve estate resources to the benefit of the Debtors’ creditors.

22. The Debtors intend to give notice of the General Bar Date on or before May 13, 2025 by sending the Bar Date Package to all known persons and entities holding potential claims against the Debtors within five (5) business days of entry of the Proposed Order; this would give

creditors required to submit Proofs of Claim by the Bar Date approximately thirty (30) days to file their respective Proofs of Claim. The Debtors respectfully submit that the proposed timeline will give all parties in interest adequate notice of the Bar Dates and an opportunity to respond.

23. The procedures described herein provide creditors with ample notice and opportunity and a clear process for filing Proofs of Claim and achieve administrative and judicial efficiency. Indeed, the proposed procedures will provide comprehensive notice and clear instructions to creditors, on the one hand, and allow these Chapter 11 Cases to move forward quickly with a minimum of administrative expense and delay, on the other hand. The proposed procedures also provide clear instructions that will help avoid confusion or uncertainty among creditors that might lead them to file unnecessary protective Proofs of Claim or multiple Proofs of Claim that would cause expense and delay in the claims process for all parties. The proposed procedures are designed to comply with the applicable provisions of the Bankruptcy Code and provide the Debtors with flexibility in case of the need for supplemental bar dates or situations in which a creditor's claim status may change during these Chapter 11 Cases (such as in the event of contract rejections).

24. As noted, the Debtors propose that customers of Debtors holding potential claims under warranties and membership agreements (other than those that have filed or threatened a lawsuit) be exempt from filing Proofs of Claim by the General Bar Date. As described in the *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 [D.I. 34] (as amended by D.I. 55), the Debtors have entered into stalking horse purchase agreements with six different sets of purchasers (collectively, the "Stalking Horse Purchasers") pursuant to which the Stalking Horse Purchasers have agreed to assume liabilities for customer warranties and membership agreements. The Debtors are confident that they will be able to close sales with the Stalking Horse Purchasers (or any other successful bidder(s)).

25. The Debtors believe it is in the best interest of the estates not to serve customers whose potential claims will be assumed on a go-forward basis by the Stalking Horse Bidders (or any other successful bidder(s)). Among other reasons, service of the Bar Date Notice and Proof of Claim Form on these customers may create confusion among the Debtors' customer base as to the status of their claims and may negatively impact the Debtors' business while the Debtors are pursuing a value-maximizing process for pursuing a sale in chapter 11 of the Debtors' assets. Additionally, the Debtors have over 150,000 customers on their customer lists; serving the Bar Date Notice and Proof of Claim Form on all these customers would be an unnecessary expense to the Debtors' estates.

RESERVATION OF RIGHTS

26. Nothing in the Proposed Order or this Motion (a) is intended or shall be deemed to constitute an assumption of any agreement pursuant to section 365 of the Bankruptcy Code or an admission as to the validity of any claim against the Debtors and their estates; (b) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors and their estates with respect to the validity, priority, or amount of any claim against the Debtors and their estates; (c) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors and their estates with respect to any

and all claims or causes of action, except as expressly provided for in the Proposed Order; or (d) shall be construed as a promise to pay a claim.

NOTICE

27. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee for the Northern District of Georgia; (b) the Debtors' prepetition and postpetition lenders and collateral agent; (c) counsel to the Committee; (d) the United States Attorney for the Northern District of Georgia; (e) the Georgia Department of Revenue; (f) the Internal Revenue Service; (g) the states attorneys general for states in which the Debtors conduct business; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

28. No previous request for the relief sought herein has been made by the Debtors to this Court or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: April 22, 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

Counsel for the Debtors and Debtors in Possession

Exhibit A

Bar Date 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)

(Jointly Administered)

Re: Docket No. __

**ORDER (I) FIXING DEADLINES FOR FILING PROOFS OF CLAIM AND
(II) APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Upon the *Motion of the Debtors for Entry of an Order (I) Fixing Deadlines for Filing Proofs of Claim and (II) Approving the Form and Manner of Notice Thereof* (the “Motion”);² and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

and 1409; and it appearing that due and adequate notice of the Motion has been given under the circumstances; and this Court having held a hearing (the “Hearing”) to consider the relief requested in the Motion; and upon the record of the Hearing, this Court having determined that there is good and sufficient cause for the relief set forth in this Order; and after due deliberation thereon,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The proposed Bar Date Notice and the Proof of Claim Form, substantially in the forms annexed hereto as **Exhibit 1** and **Exhibit 2**, respectively, are approved.
3. Except as otherwise provided for or specifically excepted in this Order, all “claims” (as defined in section 101(5) of the Bankruptcy Code) of a person or entity (other than a governmental unit) arising before March 16, 2025 (the “Petition Date”), including any claims under section 503(b)(9) of the Bankruptcy Code against any of the Debtors’ estates, shall be filed with Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”) pursuant to the procedures provided in this Order so as to be **actually received** on or before **June 13, 2025 at 5:00 p.m.** (prevailing Eastern Time) (the “General Bar Date”).
4. All governmental units (as defined in section 101(27) of the Bankruptcy Code) holding or wishing to assert claims against any Debtor arising before the Petition Date are required to file a proof of claim so that any such proof of claim is **actually received** by Verita on or before **September 12, 2025 at 5:00 p.m.** (prevailing Eastern Time) (the “Governmental Bar Date”).
5. If any Debtor amends or supplements its respective Schedules of Assets and Liabilities (the “Schedules”) after the Bar Date Notice is served, such Debtor shall give notice of any amendment or supplement to the holders of claims affected thereby within fourteen (14) days thereof, and such holders, as set forth in any such notice, shall have until the later of (i) the General

Bar Date or, if the creditor is a governmental unit, the Governmental Bar Date, and (ii) twenty-one (21) days from the date of service of such notice to file a proof of claim (the “Amended Schedules Bar Date”). Any such holder that fails to timely file a proof of claim as provided for in this Paragraph 5 shall be barred from filing a proof of claim.

6. Holders of claims against any Debtor arising from such Debtor’s rejection of an executory contract or unexpired lease must file a proof of claim on or before the later of (a) the General Bar Date, (b) thirty (30) days after the effective date of rejection of any unexpired lease or executory contract, and (c) such other date, if any, as the Court may fix in the order authorizing such rejection (the “Rejection Damages Bar Date” and together with the General Bar Date, the Governmental Bar Date, and the Amended Schedules Bar Date, as applicable, the “Bar Dates”). For the avoidance of doubt, a counterparty to a contract or lease with any Debtor holding a claim on account of such contract or lease arising (or deemed to arise) on or before the Petition Date must file a Proof of Claim by the General Bar Date.

7. Except as otherwise provided for or specifically excepted in this Order, all persons and entities asserting a claim against more than one Debtor must file a separate claim for each such Debtor on or before the applicable Bar Date associated with such claim.

8. The following persons and entities are not required to file a proof of claim on or before the applicable Bar Dates solely with respect to the types of claims held by such persons and entities described in the applicable paragraph below:

- a) any entity that already has filed a signed Proof of Claim against the Debtors with the Clerk of the Court or with the Claims in a form substantially similar to Official Form 410;
- b) any entity whose claim against a Debtor is listed in the applicable Debtor’s Schedules filed with the Court, or in any supplements or amendments to the Schedules, (i) that is not identified as “contingent,” “unliquidated,” or “disputed”; and (ii) with respect to which the claimant agrees with the amount, nature, classification, and characterization of the claim as set forth in the Schedules;

- c) any entity whose claim previously has been allowed by order of the Court;
 - d) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
 - e) pursuant to the *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 a Final Hearing, and (F) Granting Related Relief* [D.I. 32] (the “Interim Order”), and in any final order approving the DIP Facility (as defined in the Interim Order), the Prepetition Secured Parties (as defined in the Interim Order);
 - f) any Debtor against any other Debtor;
 - g) any holder of an equity interest in the Debtors (each, an “Interest Holder”), which interest is based solely upon the ownership of membership interests, common or preferred stock, warrants, options, or rights to purchase, sell, or subscribe to such a security or interest of the Debtors (an “Interest”); provided, however, that any Interest Holder who wishes to assert a claim against any Debtor, including a claim relating to such equity interest or the purchase, sale, issuance, or distribution of such interest, must file a proof of claim asserting such claim on or prior to the General Bar Date pursuant to procedures set forth herein;
 - h) any holder of an administrative expense claim for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, 503(b)(1)-(8), and 507(a)(2) of the Bankruptcy Code;
 - i) any claims held by managers, officers, and employees of the Debtors as of the Petition Date for indemnification, contribution, or reimbursement; or
 - j) any customer holding a claim or claims under warranties and/or membership agreements,³ other than those customers who assert a claim arising from or relating to pending or threatened litigation against any of the Debtors.
9. Any creditor whose prepetition claim against the Debtors are not listed in the appropriate Schedules or is listed therein as “disputed,” “contingent,” or “unliquidated” and that desires to participate in the Chapter 11 Cases or share in any distribution in the Chapter 11 Cases, and any creditor whose prepetition claim is improperly classified in the Schedules or is listed in

³ Such applicable warranty and membership agreements of the Debtors are further described as “Customer Programs” in the *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* [D.I. 12].

an incorrect amount or is against the incorrect Debtor, must file a proof of claim on or before the applicable Bar Date for such claim as set forth in this Order.

10. Each proof of claim, to be properly filed pursuant to this Order, shall: (a) be filed with original signatures (except for an Electronic Proof of Claim), (b) be legible and written in the English language, (c) must specify by name and case number against which Debtor the claim is filed, (d) be denominated in currency of the United States, (e) conform substantially to the Proof of Claim Form attached hereto as **Exhibit 2**, and (f) be submitted with copies of supporting documents (or a summary if voluminous) or an explanation of why the supporting documents are not available.

11. In addition to meeting all the other requirements of the immediately preceding paragraph above, any proof of claim asserting a section 503(b)(9) claim must: (a) include the value of the goods delivered to and received by the applicable Debtor in the twenty (20) days prior to the Petition Date; (b) attach any documentation identifying the date such goods were received by the applicable Debtor; (c) state whether the amount asserted in the proof of claim represents a combination of goods and services and, if applicable, the portion of the claim that relates solely to the value of goods, (d) identify the particular invoices on which the section 503(b)(9) claim is based, and (e) attach documentation of any reclamation demand made to the applicable Debtor under section 546(c) of the Bankruptcy Code (if applicable).

12. Proofs of claim filed with Verita will be deemed timely filed only if ***actually received*** by Verita on or before the applicable Bar Date for such claim as follows:

If sent by United States Postal Service, Hand Delivery, or Overnight Delivery, send to:

Air Pros Claims Processing Center c/o KCC dba Verita, 222 N. Pacific Coast Hwy.,
Suite 300, El Segundo, California 90245

Electronically (using an Electronic Proof of Claim):

Alternatively, proofs of claim may be submitted electronically using the interface available on the following website maintained by Verita in connection with the Chapter 11 Cases <https://www.veritaglobal.net/AirPros>.

13. Proofs of Claim submitted by facsimile, telecopy, e-mail, or other electronic means (except for an Electronic Proof of Claim) shall not be accepted, and Proofs of Claim submitted by such means shall not be deemed timely filed.

14. Parties who file an originally executed proof of claim and wish to receive from Verita a proof of receipt of their proofs of claim, must also include with their original proof of claim a copy of such claim and a self-addressed and pre-stamped envelope. A party who files a proof of claim electronically can verify receipt of its claim by reviewing claims on the website of Verita at <https://www.veritaglobal.net/AirPros>.

15. Any creditor and any party-in-interest required to file a proof of claim who fails to do so by the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting the claim against the Debtors and the Debtors' estates and shall be barred from participating in any plan of reorganization as may be confirmed in these Chapter 11 Cases with regard to such claim. If it is unclear from any of the Debtors' Schedules whether a creditor's claim is disputed, contingent, or unliquidated as to amount or is otherwise properly listed and classified, such creditor **must** file a proof of claim on or before the applicable Bar Date. Any creditor that relies on the Schedules bears responsibility for determining that its claim is accurately listed therein.

16. The Debtors are authorized and directed to serve the Bar Date Notice and a Proof of Claim Form (collectively, the "Bar Date Package") by first-class mail, postage prepaid, within five (5) business days following the date on which this Order is entered on: (a) all known creditors; (b) all persons and entities with whom any Debtor conducted business post-petition; (c) all parties listed on the Debtors' mailing matrix; (d) all parties to pending litigation against any of the

Debtors; (e) all entities who have filed a notice of appearance in these Chapter 11 Cases; (f) the Internal Revenue Service; and (g) local taxing authorities and states attorneys general in jurisdictions in which the Debtors conduct their respective businesses; provided, however, that the Debtors shall not be required to serve their customers other than those customers who have asserted a claim arising from or relating to pending or threatened litigation against any of the Debtors.

17. Prior to mailing the Bar Date Package, the Debtors may cause to be filled in any missing dates and other information, correct any typographical errors, conform the provisions thereof to this Order, and make such other non-material changes to the Bar Date Notice and the Proof of Claim Form as the Debtors deem necessary or appropriate. Without limiting the foregoing, the Proof of Claim Form may be customized for each creditor whose claim is listed on the Schedules with the creditor's name, address, and/or information regarding the nature, amount, and status of its claim(s) as reflected in the Schedules.

18. The Debtors, through Verita, shall post the Proof of Claim Form and the Bar Date Notice on the following website maintained by Verita: <https://www.veritaglobal.net/AirPros>.

19. The Debtors retain all rights to (a) object to any proof of claim on any grounds; (b) dispute, or assert offsets or defenses to, any claim reflected on the Schedules, or any amendments thereto, as to amount, liability, classification, or otherwise; and (c) subsequently designate any claim as disputed, contingent, and/or unliquidated.

20. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

21. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

22. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.

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)

Terminus 200

3333 Piedmont Road, NE, Suite 2500

Atlanta, Georgia 30305

Telephone: (678) 553-2100

Email: kurzweild@gtlaw.com

petriem@gtlaw.com

*Counsel for the Debtors and
Debtors in Possession*

Exhibit 1

Bar Date Notice

**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)

**NOTICE OF BAR DATES FOR FILING PROOFS OF CLAIM
INCLUDING SECTION 503(b)(9) CLAIMS**

The chapter 11 bankruptcy cases (the “Chapter 11 Cases”) concerning the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) was filed on March 16, 2025 (the “Petition Date”). You may be a creditor of the Debtor.

On May [●], 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Bankruptcy Court”) entered an order (the “Bar Date Order”) in the Chapter 11 Cases in accordance with Bankruptcy Rule 3003(c) fixing:

(a) **June 13, 2025 at 5:00 p.m. (prevailing Eastern Time)** (the “General Bar Date”) as the last date for persons or entities, other than governmental units, to file proofs of claim against the Debtors on account of claims arising, or deemed to have arisen, prior to the Petition Date, including, for the avoidance of doubt, claims arising under section 503(b)(9) of title 11 of the United States Code (the “Bankruptcy Code”); and

(b) **September 12, 2025 at 5:00 p.m. (prevailing Eastern Time)** (the “Governmental Bar Date”)² as the last date for all governmental units, as defined in section 101(27) of the Bankruptcy Code, to file proofs of claim against the Debtors on account of claims arising, or deemed to have arisen, prior to the Petition Date.

1. WHO MUST FILE A PROOF OF CLAIM

This Notice is being sent to many persons and entities that have had some relationship with or have done business with any of the Debtors but may not have a claim against the Debtors. The fact that you have received this Notice does not mean that you have a claim against any of the Debtors or that the Debtors or the Court believe that you have such a claim. **YOU SHOULD NOT FILE A**

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.

² The General Bar Date, the Governmental Bar Date, the Rejection Damages Bar Date (as defined below), and the Amended Schedules Bar Date (as defined below) are collectively referred to herein as the “Bar Dates”.

PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST ANY OF THE DEBTORS.

You **MUST** file a proof of claim to vote on any chapter 11 plan of reorganization or liquidation or to share in distributions from the Debtors' bankruptcy estates if you have a claim (as defined in section 101(5) of the Bankruptcy Code) that arose prior to March 16, 2025 and it is not one of the types of claims described in Section 2 subparagraphs (a) through (h) below.

Acts or omissions of any of the Debtors that arose before the Petition Date may give rise to claims against any of the Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated prior to the Petition Date. Under section 101(5) of the Bankruptcy Code and as used herein, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

2. PARTIES WHO NEED NOT FILE A PROOF OF CLAIM

The following persons and entities are not required to file a proof of claim on or before the applicable Bar Dates solely with respect to the types of claims held by such persons and entities described in the applicable paragraph below:

- a) any entity that already has filed a signed Proof of Claim against the Debtors with the Clerk of the Court or with the Claims in a form substantially similar to Official Form 410;
- b) any entity whose claim is listed against a Debtor in the applicable Debtor's Schedules filed with the Court, or in any supplements or amendments to the Schedules, (i) that is not identified as "contingent," "unliquidated," or "disputed"; and (ii) with respect to which the claimant agrees with the amount, nature, classification, and characterization of the claim as set forth in the Schedules;
- c) any entity whose claim previously has been allowed by order of the Court;
- d) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
- e) pursuant to the *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 a Final Hearing, and (F) Granting Related Relief* [D.I. 32] (the "Interim Order"), and in any final order approving the DIP Facility (as defined in the Interim Order), the Prepetition Secured Parties (as defined in the Interim Order);
- f) any Debtor against any other Debtor;

- g) any holder of an equity interest in the Debtors (each, an “Interest Holder”), which interest is based solely upon the ownership of membership interests, common or preferred stock, warrants, options, or rights to purchase, sell, or subscribe to such a security or interest of the Debtors (an “Interest”); provided, however, that any Interest Holder who wishes to assert a claim against any Debtor, including a claim relating to such equity interest or the purchase, sale, issuance, or distribution of such interest, must file a proof of claim asserting such claim on or prior to the General Bar Date pursuant to procedures set forth herein;
- h) any holder of an administrative expense claim for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, 503(b)(1)-(8), and 507(a)(2) of the Bankruptcy Code;
- i) any claims held by managers, officers, and employees of the Debtors as of the Petition Date for indemnification, contribution, or reimbursement; or
- h) any customer holding a claim or claims under warranties and/or membership agreements,³ other than those customers who assert a claim arising from or relating to pending or threatened litigation against any of the Debtors.

If the Bankruptcy Court, in the future, fixes a date by which the claims described in Section 2 subparagraphs (a) through (h) must be filed, you will be notified.

3. AMENDMENTS OR SUPPLEMENTS TO SCHEDULES

If any of the Debtors amends or supplements its Schedules after this Notice is served, the Debtors shall give notice of any amendment or supplement to the holders of claims affected thereby, and such holders, as set forth in any such notice, shall have until the later of (i) the General Bar Date or, if the creditor is a governmental unit, the Governmental Bar Date, and (ii) twenty-one (21) days from the date of service of such notice to file a proof of claim or be barred from so doing (the “Amended Schedules Bar Date”).

4. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

If you hold a claim against any of the Debtors arising from the rejection of an executory contract or unexpired lease, you must file a proof of claim on or before the later of: (a) the General Bar Date, (b) thirty (30) days after the effective date of rejection of any unexpired lease or executory contract of any of the Debtors as provided by an order of the Court or (c) such other date, if any, as the Court may fix in the order authorizing such rejection (the “Rejection Damages Bar Date”).

For the avoidance of doubt, a counterparty to a contract or lease with any Debtor holding a claim on account of such contract or lease arising (or deemed to arise) on or before the Petition Date **MUST** file a Proof of Claim by the General Bar Date.

³ Such applicable warranty and membership agreements of the Debtors are further described as “Customer Programs” in the *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* [D.I. 12].

5. WHEN AND WHERE TO FILE

All proofs of claim shall be filed with the Debtors' claims agent, Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), pursuant to the procedures provided herein so as to actually be received on or before the applicable Bar Date at the following address if delivered by first class mail, hand delivery, or overnight courier:

If sent by United States Postal Service, Hand Delivery, or Overnight Delivery, send to:

Air Pros Claims Processing Center c/o KCC dba Verita, 222 N. Pacific Coast Hwy.,
Suite 300, El Segundo, California 90245

Electronically:

Alternatively, proofs of claim may be submitted electronically using the interface available on the following website maintained by Verita in connection with the Chapter 11 Cases <https://www.veritaglobal.net/AirPros>.

If you wish to receive from Verita a proof of receipt of your proof of claim, you must also include with your original proof of claim a copy of such claim and a self-addressed, stamped envelope.

Proofs of claim sent by fax or email **WILL NOT** be accepted.

6. WHAT TO FILE

The Debtors are enclosing a proof of claim form (the "Proof of Claim Form") for use in the Chapter 11 Cases. If your claim is scheduled by the Debtors, the form also may set forth the amount of your claim as scheduled by the applicable Debtor. You will receive a different Proof of Claim Form for each claim scheduled in your name by the applicable Debtor. For the avoidance of doubt, all persons and entities asserting a claim against more than one Debtor must file a separate claim for each such Debtor on or before the applicable Bar Date associated with such claim.

To be properly filed pursuant to this Notice, each proof of claim must: (i) be filed with original signatures (except for an Electronic Proof of Claim), (ii) be legible and written in the English language, (iii) must specify by name and case number against which Debtor the claim is filed, (iv) be denominated in currency of the United States, (v) conform substantially with the Proof of Claim Form provided with this Notice, and (vi) be submitted with copies of supporting documents (or a summary if voluminous) or an explanation of why the supporting documents are not available.

In addition, any proof of claim asserting a section 503(b)(9) claim must: (a) include the value of the goods delivered to and received by the applicable Debtor in the twenty (20) days prior to the Petition Date; (b) attach any documentation identifying the date such goods were received by the applicable Debtor; (c) state whether the amount asserted in the proof of claim represents a combination of goods and services and, if applicable, the portion of the claim that relates solely to the value of goods, (d) identify the particular invoices on which the section 503(b)(9) claim is based, and (e) attach documentation of any reclamation demand made to the applicable Debtor under section 546(c) of the Bankruptcy Code (if applicable).

The Proof of Claim Form can be obtained on the website maintained by Verita at <https://www.veritaglobal.net/AirPros>. Alternatively, the Official Bankruptcy Form B410 can be found at <http://www.uscourts.gov/forms/bankruptcy-forms>.

Dated: [•], 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ DRAFT

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

*Counsel for the Debtors and Debtors in
Possession*

Exhibit 2

Proof of Claim Form

United States Bankruptcy Court for the Northern District of Georgia, Newnan Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- | | | |
|--|---|--|
| <input type="checkbox"/> AFH Air Pros, LLC (Case No. 25-10356) | <input type="checkbox"/> Air Pros Solutions Holdings, LLC (Case No. 25-10363) | <input type="checkbox"/> Dallas Plumbing Air Pros, LLC (Case No. 25-10370) |
| <input type="checkbox"/> Air Pros Atlanta LLC (Case No. 25-10357) | <input type="checkbox"/> Air Pros Solutions, LLC (Case No. 25-10364) | <input type="checkbox"/> Doug's Service Air Pros, LLC (Case No. 25-10371) |
| <input type="checkbox"/> Air Pros Blue Star, LLC (Case No. 25-10358) | <input type="checkbox"/> Air Pros Texas LLC (Case No. 25-10365) | <input type="checkbox"/> Dream Team Air Pros, LLC (Case No. 25-10372) |
| <input type="checkbox"/> Air Pros Boca LLC (Case No. 25-10359) | <input type="checkbox"/> Air Pros Washington, LLP (Case No. 25-10366) | <input type="checkbox"/> East Coast Mechanical, LLC (Case No. 25-10373) |
| <input type="checkbox"/> Air Pros Colorado LLC (Case No. 25-10360) | <input type="checkbox"/> Air Pros West LLC (Case No. 25-10367) | <input type="checkbox"/> Hansen Air Pros, LLC (Case No. 25-10374) |
| <input type="checkbox"/> Air Pros Dallas L.L.C. (Case No. 25-10361) | <input type="checkbox"/> Air Pros, LLC (Case No. 25-10368) | <input type="checkbox"/> Mauzy Air Pros, LLC (Case No. 25-10375) |
| <input type="checkbox"/> Air Pros One Source LLC (Case No. 25-10362) | <input type="checkbox"/> CM Air Pros, LLC (Case No. 25-10369) | |

Modified Official Form 410

Proof of Claim

12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim) _____
Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

☐ No
☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Name _____
Number _____ Street _____
City _____ State _____ ZIP Code _____
Country _____
Contact phone _____
Contact email _____
Uniform claim identifier (if you use one): _____

Name _____
Number _____ Street _____
City _____ State _____ ZIP Code _____
Country _____
Contact phone _____
Contact email _____

4. Does this claim amend one already filed?

☐ No
☐ Yes. Claim number on court claims registry (if known) _____ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☐ No
☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _ _ _ _
7. How much is the claim?	\$ _____ Does this amount include interest or other charges? <input type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. _____
9. Is all or part of the claim secured?	<input type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

<p>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</p> <p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. <i>Check all that apply:</i></p> <p><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</p> <p><input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</p> <p><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</p> <p><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. \$ _____</p> <p style="font-size: small;">* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</p>	<p>Amount entitled to priority</p>
<p>13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.</p> <p>\$ _____</p>	

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
- ☐ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City _____ State _____ ZIP Code _____ Country _____

Contact phone _____ Email _____

Modified Official Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

12/24

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.

- Fill in the caption at the top of the form

- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.

- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).

- Do not attach original documents because attachments may be destroyed after scanning.

- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

Air Pros Claims Processing Center
c/o KCC dba Verita Global
222 N. Pacific Coast Hwy., Ste. 300
El Segundo, CA 90245

Alternatively, your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/AirPros>

- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth. See Bankruptcy Rule 9037.

- For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <https://www.veritaglobal.net/AirPros>

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate.
11 U.S.C. § 503.

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Claim Pursuant to 11 U.S.C. §503(b)(9): A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

Creditor: A person, corporation, or other entity whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Do not file these instructions with your form.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.