

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

IN RE	:	CHAPTER 11
	:	
AFH AIR PROS, LLC,	:	CASE NO. 25-10356-PMB
	:	
Debtor.	:	
	:	
FORD MOTOR CREDIT	:	
	:	
Movant,	:	
	:	
v.	:	
	:	CONTESTED MATTER
AFH AIR PROS, LLC, Debtors et al. ;	:	
	:	
Respondents.	:	
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	:	
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NOTICE OF HEARING

PLEASE TAKE NOTICE that FORD MOTOR CREDIT has filed a Motion for Relief from Automatic Stay and related papers with the Court seeking an order of relief from the Automatic Stay.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Motion for Relief from Automatic Stay, at **10:00 a.m. on August 20, 2025 in 2nd Floor Courtroom, Lewis R. Morgan Federal Building, 18 Greenville Street, Newnan, Georgia 30264** which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.



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Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings, or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is Clerk, U.S. Bankruptcy Court, Lewis R. Morgan Federal Building, 18 Greenville Street, Newnan, Georgia 30264. You must also mail a copy of your response to the undersigned at the address stated below.

If a hearing on the Motion cannot be held within thirty (30) days, Movant waives the requirement for holding a preliminary hearing within thirty days of filing the motion and agrees to a hearing on the earliest possible date. Movant consents to the automatic stay remaining in effect until the Court orders otherwise.

Dated: August 4 2025

Signature: /s/Andrew D. Gleason

Andrew D. Gleason
5555 Glenridge Connector
Suite 900
Atlanta, Georgia 30342
(404) 869-6900
agleason@lrglaw.com
Bar Number 297122

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**MOTION FOR RELIEF FROM AUTOMATIC STAY AND/OR CONFIRMATION OF
OF NO STAY IN EFFECT**

NOW COMES FORD MOTOR CREDIT (the "Movant") and moves this Court for relief from the automatic stay and /or confirmation of no stay in effect and shows the Court as follows:

1.

On 03/16/2025, AFH Air Pros, LLC et al ("Debtors") filed a Voluntary Petition pursuant to 11 U.S.C. Chapter 11, and said case is pending before this Court.

2.

Movant has a claim in this case secured by a first priority lien against vehicle owned by C and P Hansen Heating and Cooling, Inc. (An owner of the Debtor and a creditor) , to wit: 2021 Ford Commercial E350 Cube Van (the "Collateral").The approximate payoff is

\$9182.60 as of July 22, 2025. The NADA retail value of the Collateral is \$27300.00 in clean retail condition, and Movant has no other collateral securing this loan.

3.

The account is past due \$3700.92 as of July 22, 2025. Payments are \$925.23 and the account is past due for March 30, 2025, April 30, 2025, May 30, 2025 and June 30, 2025. The July 30, 2025 payment may also be past due adding to the delinquency.

4.

Debtor does not have significant equity in the Collateral and the Collateral is not necessary to a reorganization that is in prospect.

5.

Cause exists including the lack of adequate protection to grant Movant relief from the automatic stay so as to authorize Movant to recover and dispose of the Collateral. Movant requests the right to file an amended proof of claim after liquidation of the Collateral.

6.

Movant requests that Bankruptcy Rule 4001(a)(4) be waived.

7.

Movant has no proof of full coverage insurance protecting its interest in the Collateral.

8.

To the extent that there is an automatic stay in effect, Movant seeks relief from that automatic stay or confirmation that there is no stay in effect.

WHEREFORE, Movant prays that this Court:

(a) Hold a hearing pursuant to this Motion within thirty (30) days as is required under 11 U.S.C. Section 362(e);

(b) Grant Movant relief from the automatic stay under 11 U.S.C. Section 362(d) or confirm that there is no stay in effect so as to allow Movant to recover and dispose of the Collateral and to apply the net proceeds generated therefrom to its claim in this case, and if the

disposition results in a deficiency, amend its claim filed in this case, subject to objection;

(c) Rule 4001(a)(4) be waived; and

(d) Grant such other and further relief as the Court deems to be just and proper.

This August 4, 2025.

The Law Office of
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.
Attorneys for Movant

By: /s/Andrew D. Gleason
Andrew D. Gleason
Georgia State Bar No. 297122

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Atlanta, Georgia 30342
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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2025, I electronically filed the foregoing MOTION FOR RELIEF FROM AUTOMATIC STAY and NOTICE OF HEARING using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

David B Kurzweil
Terminus 200 - Suite 2500 3333 Piedmont Road, NE
Atlanta, GA 30305

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid on the following parties at the address shown for each:

Largest 30 unsecured creditors attached as exhibit "A" and

AFH Air Pros, LLC
150 S. Pine Island Road, Suite 200
Plantation, FL 33324

AFH Air Pros, LLC
150 S. Pine Island Road, Suite 200
Plantation, FL 33324

David B Kurzweil
Terminus 200 - Suite 2500 3333 Piedmont Road, NE
Atlanta, GA 30305

U.S. Trustee
Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

Anna Mari Humnicky
Small Herrin, LLP
100 Galleria Parkway
Suite 350
Atlanta, GA 30339

Benjamin S. Klehr
Small Herrin, LLP
100 Galleria Parkway
Suite 350
Atlanta, GA 30339

Paul J. Labov
Pachulski Stang Ziehl & Jones LLP
36th Floor
1700 Broadway
New York, NY 10019

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Pachulski Stang Ziehl & Jones LLP
Suite 3430
One Sansome Street
San Francisco, CA 94104

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Pachulski Stang Ziehl & Jones LLP
36th Floor
1700 Broadway
New York, NY 10019
212-561-7700

Bradford J. Sandler
Pachulski Stang Ziehl & Jones LLP
36th Floor
1700 Broadway
New York, NY 10019

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Small Herrin, LLP
100 Galleria Parkway
Suite 350
Atlanta, GA 30339

James W. Walker
Pachulski Stang Ziehl & Jones LLP
Suite 4500
700 Louisiana Street
Houston, TX 77002

Air Pros Atlanta LLC
150 S. Pine Island Road
Suite 200
Plantation, FL 33324

dba Air Force Heating and Air
dba Airforce Heating and Cooling, LLC

Air Pros Blue Star, LLC

150 S. Pine Island Road
Suite 200
Plantation, FL 33324

Air Pros Boca LLC

150 S. Pine Island Road
Suite 200
Plantation, FL 33324

Air Pros Colorado LLC

150 S. Pine Island Road
Suite 200
Plantation, FL 33324

Air Pros One Source LLC

150 S. Pine Island Road
Suite 200
Plantation, FL 33324

dba One Source Home Service

dba Air Pros, LLC

Air Pros Solutions Holdings, LLC

150 S. Pine Island Road
Suite 200

Plantation, FL 33324

Air Pros Solutions, LLC

150 S. Pine Island Road
Suite 200
Plantation, FL 33324

Air Pros Texas LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

dba Dallas Plumbing, Heating & Cooling

Air Pros Washington, LLP

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

Air Pros West LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

Air Pros, LLC

150 S. Pine Island Road Suite 200

Plantation, FL 33324

Tax ID / EIN: 82-1033425

dba Universal Heat and Air

dba Drain Genie

dba Drain Genie Plumbing Services

dba Personalized Power and Air

dba Universal Air and Heat

dba Personalized Power Systems

dba Jack Rabbit

dba Universal Restoration, Inc.

CM Air Pros, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

dba CM Heating

dba CM Heating and Cooling

dba CM Heating, Cooling, Plumbing, and Electric

dba CM Home Services

Dallas Plumbing Air Pros, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

dba Dallas Plumbing and Air Conditioning

Doug's Service Air Pros, LLC 150 S. Pine Island Road

Suite 200

Plantation, FL 33324

Dream Team Air Pros, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

dba Dream Team Heating & Air

East Coast Mechanical, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

dba ECM

fka East Coast Mechanical, Inc.

dba ECM Air Conditioning

Hansen Air Pros, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

fka Dial One Air Pros L.L.C.

dba Hansen Super Techs

Mauzy Air Pros, LLC

150 S. Pine Island Road

Suite 200

Plantation, FL 33324

Kurtzman Carson Consultants, LLC dba Verita Global

222 N. Pacific Coast Highway

Suite 300

El Segundo, CA 90245

United States

Kurtzman Carson Consultants, LLC dba Verita Global

222 N. Pacific Coast Highway

Suite 300

El Segundo, CA 90245

United States

Dated: August 4, 2025.

The Law Office of
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.
Attorneys for Movant

By: /s/Andrew D. Gleason
Andrew D. Gleason
Georgia State Bar No. 297122

5555 Glenridge Connector
Suite 900
Atlanta, Georgia 30342
(404) 869-6900
agleason@lrglaw.com

Name of creditor and complete mailing address, including zip code	
1	IC M. HEATING INC. CKG GROUP, INC. FKA/CM HEATING INC 1500 INDUSTRY STREET STE 200 EVERETT, WA 98203
2	DESPEDIDA HOLDINGS, INC. JOSE RAMIREZ 19033 JUPITER RIVER ROAD JUPITER, FL 33458
3	C&P HANSEN HEATING AND COOLING, INC. CHAD SETCHELL 7718 ROCKSTONE LANE S MOBILE, AL 36695
4	LAGRANGE AIR FORCE HEATING AND AIR, LLC GORDON, FOURNARIS & MAMMARELLA, P.A. 1925 LOVERING AVENUE WILMINGTON, DE 19806
5	JACK DENTON C/O EARL & EARL, PLLC 4585 HILTON PARKWAY ST. 228 COLORADO SPRINGS, CO 80907
6	KROLL, LLC CURTIS B. LEITNER 250 W. 55TH STREET 13TH FLOOR NEW YORK, NY 10019
7	WEST GEORGIA INDOOR COMFORT, LLC WILLIAM JONES 100 CORPORATE PARK E CT LAGRANGE, GA 30241
8	UNIVERSAL RESTORATION, INC MIKE FORGIONE 1060 NE 27TH WAY POMPANO BEACH, FL 33062
9	DOUG'S SERVICE COMPANY JEFF TAUZIN 1459 TIGER DRIVE THIBODAUX, LA 70301
10	FIRST INSURANCE FUNDING 1503 CYPRESS RD POMPANO BEACH, FL 33060
11	ONE SOURCE HOME SERVICE, LLC JASON BIDWELL 3914 STAR ISLAND DRIVE HOLIDAY, FL 34691
12	DREAM TEAM SERVICES, LLC TREY ANNISON 39062 REINNINGER RD DENHAM SPRINGS, LA 70706
13	ENTERPRISE FM TRUST MARK J. TORRE 600 CORPORATE PARK DRIVE ST. LOUIS, MO 63105
14	CONTINENTAL CASUALTY COMPANY 87 NE 44TH ST SUITE 5 OAKLAND PARK, FL 33334

Name of creditor and complete mailing address, including zip code	
15	DALLAS PLUMBING COMPANY PO BOX 551648 DALLAS, TX 75355
16	MC GEE & HUSKEY, P.A. EDWARD MC GEE, JR. 2850 NORTH ANDREWS AVENUE FORT LAUDERDALE, FL 33311
17	LEARFIELD COMMUNICATIONS, LLC 5400 LYNDON B. JOHNSON FREEWAY SUITE 100 DALLAS, TX 75240
18	CHANTEL LESTER MICHAEL GONZALEZ 1000 N. ASHLEY DRIVE SUITE 520 TAMPA, FL 33602
19	FLORIDA PANTHERS HOCKEY CLUB LTD. ATTN: GENERAL COUNSEL ONE PANTHER PARKWAY SUNRISE, FL 33323
20	WRIGHT TOTAL INDOOR COMFORT LLC RASCO KLOCK PEREZ & NIETO, P.L. 2555 PONCE DE LEON BOULEVARD SUITE 600 CORAL GABLES, FL 33134
21	EFFECTV 951 W YAMATO RD STE 265 BOCA RATON, FL 33431
22	CINTAS CORPORATION MICHAEL P. BENNETT 3471 MAIN HIGHWAY SUITE 206 COCONUT GROVE, FL 33133
23	DATASITE LLC 733 S MARQUETTE AVE. SUITE 600 MINNEAPOLIS, MN 55402
24	ADRIENNE KOSTOV THEODORE J. BERMAN P.O. BOX 272789 BOCA RATON, FL 33427
25	JUAN ESTRADA ASHLEY CASSONE 12800 UNIVERSITY DRIVE SUITE 600 FT. MYERS, FL 33907
26	UNIFIRST JORGE RAMIREZ ALMANZA 68 JONSPIN ROAD WILMINGTON, MA 01887-1090
27	AMERICAN EAGLE MATT VILLANO 2600 S. RIVER ROAD DES PLAINES, IL 60018
28	HVAC SUCCESS 28730 S CARGO CT BONITA SPRINGS, FL 34135
29	HEAT TRANSFER SYSTEMS OF GEORGIA, LLC 11350 OLD ROSWELL RD #1300 ALPHARETTA, GA 30009
30	GALLAGHER BENEFIT SERVICES, INC. ODI ROMERO 7771 W OAKLAND PARK BLVD SUNRISE, FL 33351

exhibit "A"