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

|                              | Related to Docket Nos. 477, 478, 479 |
|------------------------------|--------------------------------------|
| Debtors.                     | (Jointly Administered)               |
| AFH AIR PROS, LLC, et al., 1 | Case No. 25-10356 (PMB)              |
| In re:                       | Chapter 11                           |
|                              |                                      |

# NOTICE OF <u>AMENDED</u><sup>2</sup> DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING ON AUGUST 6, 2025 AT 1:00 P.M. (ET)

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") hereby submit the following witness and exhibit list (the "<u>Witness and Exhibit List</u>") for the hearing currently scheduled for August 6, 2025 at 1:00 p.m. (prevailing Eastern Time) (the "<u>Hearing</u>").

#### WITNESS & EXHIBIT LIST

## I. Witnesses Who May be Called to Testify

#### A. Andrew D.J. Hede

Mr. Hede is the Debtors' Chief Restructuring Officer. Mr. Hede may provide direct testimony and will be available for cross-examination at the Hearing. If called to testify, Mr. Hede will be testifying in person in the courtroom at the Hearing in Newnan, Georgia.



<sup>&</sup>lt;sup>1</sup> The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at https://www.veritaglobal.net/AirPros. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

<sup>&</sup>lt;sup>2</sup> Amended items appear in bold.

#### **B.** Lawrence Hirsh

Mr. Hirsh is the sole manager of Air Pros Solutions Holdings and Air Pros Solutions, LLC. Mr. Hirsh may provide direct testimony and will be available for cross-examination at the Hearing. If called to testify, Mr. Hirsh will be testifying virtually.

### C. Sydney Reitzel

Ms. Reitzel is the Director of Corporate Restructuring for Kurtzman Carson Consultants, LLC d/b/a Verita Global, the Claims, Noticing, Solicitation, and Administrative Agent in these cases. Ms. Reitzel may provide direct testimony and will be available for cross-examination at the Hearing. If called to testify, Ms. Reitzel will be testifying virtually with respect to the balloting report and voting declaration filed in these cases.

**D.** Any witnesses submitted or called by any other parties in this matter.

#### II. Exhibits:

| Exhibit        | Document   | Docket No.     |
|----------------|--|----------------|
| Debtors' Ex. 1 | Order (A) Approving the Disclosure Statement On An Interim Basis, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time, and Place for the Hearing on Final Approval of the Disclosure Statement and Confirmation of the Plan and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures and Deadlines | Docket No. 477 |
| Debtors' Ex. 2 | Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates   | Docket No. 478 |
| Debtors' Ex. 3 | Second Amended Disclosure Statement for the Second<br>Amended Chapter 11 Plan of Liquidation of AFH Air Pros,<br>LLC and its Debtor Affiliates   | Docket No. 479 |
| Debtors' Ex. 4 | Notice of Filing of (I) Identity and Compensation of<br>Litigation Trustee, (II) Form of Litigation Trust Agreement,<br>and (III) Schedule of Assigned Causes of Action with<br>Respect to the Second Amended Chapter 11 Plan of<br>Liquidation of AFH Air Pros, LLC and its Debtor Affiliates   | Docket No. 557 |
| Debtors' Ex. 5 | Notice of Filing of Plan Supplement to the Second<br>Amended Chapter 11 Plan of Liquidation of AFH Air Pros,<br>LLC and its Debtor Affiliates  | Docket No. 562 |

| Exhibit         | Document   | Docket No.     |
|-----------------|--|----------------|
| Debtors' Ex. 6  | Certificate of Service of Sydney Reitzel re: Solicitation<br>Materials Served from June 30, 2025 through July 15, 2025   | Docket No. 564 |
| Debtors' Ex. 7  | Certificate of Service of Mikayla Cleary regarding Notice of Filing of Plan Supplement   | Docket No. 569 |
| Debtors' Ex. 8  | Stipulation Regarding Lender Claims Solely for the Purpose of Voting on the Debtors' Second Amended Joint Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates Pursuant to Bankruptcy Rule 3018   | Docket No. 595 |
| Debtors' Ex. 9  | Supplemental Certificate of Service of Sydney Reitzel regarding Solicitation Materials Served July 8, 2025 Through July 25, 2025   | Docket No. 596 |
| Debtors' Ex. 10 | Certificate of Service of Mikayla Cleary regarding<br>Stipulation Regarding Lender Claims  | Docket No. 601 |
| Debtors' Ex. 11 | Declaration of Sydney Reitzel, on Behalf of Kurtzman<br>Carson Consultants LLC d/b/a Verita Global, Regarding the<br>Solicitation and Tabulation of Ballots Cast on the Second<br>Amended Chapter 11 Plan of Liquidation of AFH Air Pros,<br>LLC and its Debtor Affiliates | Docket No. 607 |
| Debtors' Ex. 12 | Notice of Filing of Amended Plan Supplement to the Second<br>Amended Chapter 11 Plan of Liquidation of AFH Air Pros,<br>LLC and its Debtor Affiliates  | Docket No. 608 |
| Debtors' Ex. 13 | Debtors' Memorandum of Law in Support of Final Approval<br>of the Disclosure Statement and Confirmation of Second<br>Amended Chapter 11 Plan of Liquidation of AFH Air Pros,<br>LLC and its Debtor Affiliates  | Docket No. 610 |
| Debtors' Ex. 14 | Declaration of Andrew D.J. Hede in Support of Confirmation of the Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates   | Docket No. 611 |
| Debtors' Ex. 15 | Certificate of Service of Mikayla Cleary regarding<br>Declaration of Sydney Reitzel and Notice of Filing Amended<br>Plan Supplement  | Docket No. 612 |

| Exhibit         | Document   | Docket No.     |
|-----------------|--|----------------|
| Debtors' Ex. 16 | Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order (I) Approving the Second Amended Disclosure Statement for The Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates on a Final Basis; and (II) Confirming Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates | Docket No. 613 |
| Debtors' Ex. 17 | Notice of Filing of Second Amended Plan Supplement to<br>the Second Amended Chapter 11 Plan of Liquidation of<br>AFH Air Pros, LLC and its Debtor Affiliates   |                |
| Debtors' Ex. 18 | Certificate of Service of Documents Served on August 4, 2025 filed by Kurtzman Carson Consultants, LLC dba Verita Global (Confirmation Brief, Hede Declaration, Proposed Confirmation Order, Agenda and Witness & Exhibit List)  |                |

## **RESERVATION OF RIGHTS**

The Debtors reserve the right to (i) supplement and/or revise the Witness and Exhibit List as appropriate in advance of the Hearing; (ii) call any witness or submit any exhibit identified by any party in advance of or at the Hearing; (iii) call any witness at the Hearing that is not included on any witness list for purposes of impeachment or rebuttal; and (iv) introduce exhibits not listed above to establish foundation, impeach or refresh the recollection of a witness, or rebut testimony provided by any witness.

Dated: August 5, 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

Counsel for the Debtors and Debtors in Possession

petriem@gtlaw.com