

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

In re:

AFH AIR PROS, LLC, *et al.*,<sup>1</sup>

Wind Down Debtors.

Chapter 11

Case No. 25-10356 (PMB)

(Jointly Administered)

Objection Deadline: November 14, 2025 at 4:00 p.m. (ET)  
Hearing Date: November 18, 2025 at 1:30 p.m. (ET)

**WIND DOWN DEBTORS' MOTION FOR (A) ENTRY OF A FINAL DECREE  
CLOSING CERTAIN OF THE CHAPTER 11 CASES; (B) ORDER DIRECTING  
THAT THE ADMINISTRATION OF ALL REMAINING MATTERS IN  
RESPECT OF AFFILIATE CASES TAKE PLACE IN THE REMAINING CASE;  
(C) AMENDMENT OF THE ORDER DIRECTING JOINT ADMINISTRATION  
OF THE CHAPTER 11 CASES; AND (D) GRANTING RELATED RELIEF**

AFH Air Pros, LLC and its debtor affiliates (collectively, the “Wind Down Debtors”)<sup>2</sup> respectfully request the Court enter a final decree and order, substantially in the form attached hereto as **Exhibit A** (“the “Final Decree”), (a) closing certain of the Chapter 11 Cases, (b) directing that the administration of all remaining matters in respect of the Affiliate Cases (as defined below), including claims against and interest in the Affiliate Cases, take place in the chapter 11 case of AFH Air Pros, LLC, Case No. 25-10356 (PMB) (the “Remaining Case”), (c) amending the order directing joint administration of the Chapter 11 Cases, and (d) granting related relief, and in support thereof, respectfully represent as follows:

<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 the 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 the Chapter 11 Cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.

<sup>2</sup> Prior to the occurrence of the Effective Date (as defined, *infra*), the Wind Down Debtors were debtors and debtors in possession (collectively, the “Debtors”) in the Chapter 11 Cases (the “Chapter 11 Cases”).



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## **JURISDICTION**

1. The United States Bankruptcy Court for the Northern District of Georgia, Newnan Division (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409

2. The statutory bases for the relief requested herein are sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), Rule 3022 of the Federal Rules of Bankruptcy Procedure, and *General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”).

## **BACKGROUND**

### **A. The Chapter 11 Cases**

3. On March 16, 2025, each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in this Court (collectively, the “Chapter 11 Cases”), which are being jointly administered for procedural purposes only.

4. On March 27, 2025, the Bankruptcy Court entered an amended order directing joint administration of the Chapter 11 Cases [Docket No. 85] (the “Amended Joint Administration Order”) under the case of AFH Air Pros, LLC, *et al.*, Case No. 25-10356.

5. On March 31, 2025, the Office of the United States Trustee for Region 21, Atlanta Division (the “U.S. Trustee”) appointed an official committee of creditors holding unsecured claims (the “Committee”). *See* Docket No. 111. To date, no chapter 11 trustee or examiner has been appointed in the Chapter 11 Cases.

## **B. The Plan of Liquidation**

6. On September 4, 2025, the Court entered an order [Docket No. 691] (the “Confirmation Order”) confirming the *Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates* (the “Plan”) [Docket No. 478] and approving on a final basis the *Second Amended Disclosure Statement for the Second Amended Chapter 11 Plan of Liquidation of AFH Air Pros, LLC and its Debtor Affiliates* (the “Disclosure Statement”) [Docket No. 479]. Pursuant to the Plan, the Debtors Estates are substantively consolidated for voting, confirmation, and distribution purposes (Plan, Art. IV.J.).

7. The Plan provides for the establishment of the Litigation Trust for the benefit of certain unsecured creditors, to hold certain assets and make distributions to the Holders of Allowed Class 4 – General Unsecured Claims. (Plan, Art. III(B)(4) and Art. V.) The Plan further provides that the Litigation Trust shall be administered by the Litigation Trustee.<sup>3</sup> Pursuant to the Plan and the Confirmation Order, the Litigation Trust Claims, comprised of certain specified Causes of Action of the Debtors and their Estates as more fully described in the Plan Supplement, were deemed automatically transferred to and vested in the Litigation Trust. (Plan, Art. V; Confirmation Order ¶ 97.)

8. The Effective Date of the Plan occurred on October 10, 2025 [Docket No. 753], and the Wind Down Debtors substantially consummated the Plan.

9. Under the Plan, the Litigation Trustee is responsible for administering all general unsecured claims and the Plan Administrator is responsible for administering all other claims. Prior to the Effective Date, the Debtors began the claims administration process with respect to

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<sup>3</sup> Olympus Guardians LLC was appointed as the Litigation Trustee pursuant to the terms and conditions of the Litigation Trust Agreement.

administrative, priority, and secured claims. Consistent with their obligations under the Plan, the Wind Down Debtors, through the Plan Administrator, anticipate resolving objections to claims that were filed by the Debtors and filing additional objections to certain claims in the near term. Moreover, the Litigation Trustee is currently investigating the Litigation Trust Claims, which the Litigation Trustee may pursue to the extent the Litigation Trust Claims are determined to be valuable to the beneficiaries of the Litigation Trust.

10. Additionally, from time-to-time miscellaneous motions, applications, pleadings, objections (including objections to Claims), or other matters or proceedings may arise in respect of the Chapter 11 Cases or the Wind Down Debtors (collectively with the Litigation Trust Claims, the “Remaining Matters”). The Wind Down Debtors submit that the Remaining Matters, whether or not they pertain to the Remaining Case or any Affiliate Cases, may be filed, administered, prosecuted, resolved, and/or adjudicated in the Remaining Case, and therefore the closure of the Affiliate Cases will not cause any substantive impact on any party in interest.

11. Finally, the Plan provides that the Plan Administrator shall file a motion to close all of the Chapter 11 Cases except for the lead case of AFH Air Pros, LLC, which shall remain open for administrative purposes.

### **RELIEF REQUESTED**

12. The Wind Down Debtors request that the Court enter a Final Decree: (a) closing certain of the Chapter 11 Cases (collectively, the “Affiliate Cases”),<sup>4</sup> (b) directing that the

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<sup>4</sup> The Affiliate Cases include the following: Air Pros Atlanta LLC, Case No. 25-10357; Air Pros Blue Star, LLC, Case No. 25-10358; Air Pros Boca LLC, Case No. 25-10359; Air Pros Colorado LLC, Case No. 25-10360; Air Pros Dallas L.L.C., Case No. 25-10361; Air Pros One Source LLC, Case No. 25-10362; Air Pros Solutions Holdings, LLC, Case No. 25-10363; Air Pros Solutions, LLC, Case No. 25-10364; Air Pros Texas LLC, Case No. 25-10365; Air Pros Washington, LLP, Case No. 25-10366; Air Pros West LLC, Case No. 25-10367; Air Pros, LLC, Case No. 25-10368; CM Air Pros, LLC, Case No. 25-10369; Dallas Plumbing Air Pros, LLC, Case No. 25-10370; Doug’s Service Air Pros, LLC, Case No. 25-10371; Dream Team Air Pros, LLC, Case No. 25-10372; East Coast Mechanical, LLC, Case No. 25-10373; Hansen Air Pros, LLC, Case No. 25-10374; and Mauzy Air Pros, LLC, Case No. 25-10375.

administration of all claims against and interests asserted in the Affiliate Cases take place in the Remaining Case of AFH Air Pros, LLC, Case No. 25-10356 (PMB), (c) waiving the requirement of further post-confirmation reporting for the Affiliate Cases; and (d) amending the order directing joint administration of the Chapter 11 Cases.

**BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY**

13. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Additionally, Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

14. The term “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules. The Advisory Committee Note to Bankruptcy Rule 3022 (the “Advisory Committee Note”) specifically indicates that “[e]ntry of a final decree closing a chapter 11 case should not be delayed solely because the payments required by the plan have not been completed.” The Advisory Committee Note further sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;
- c. whether the property proposed by the plan to be transferred has been transferred;
- d. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- e. whether payouts under the plan have commenced; and

- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). The Advisory Committee Note further indicates that the Court “should not keep the case open only because of the possibility that the court’s jurisdiction may be invoked in the future.” *Id.* Additionally, “a final decree closing the case after the estate is fully administered does not deprive the court of jurisdiction to enforce or interpret its own orders and does not prevent the court from reopening the case for cause pursuant to § 350(b) of the [Bankruptcy] Code.” *Id.*

15. In addition to the factors set forth in the Advisory Committee Note, courts have considered whether the plan has been substantially consummated and have adopted the view that “these factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, No. 02-12608 (WS), 2005 Bankr. LEXIS 1322, at \*5 (Bankr. D. Del. June 24, 2005); *see also In re JCP Props., Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015) (noting that “substantial consummation is the pivotal question here to determine the propriety of closing the [case]”); *In re Kliegl Bros. Universal Elec. Stage Lighting Co., Inc.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999) (recognizing that bankruptcy courts weigh the factors contained in the Advisory Committee Note when deciding whether to close a case); *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 538 (Bankr. E.D. Ky. 1997) (recognizing that Bankruptcy Rule 3022 allows the court flexibility and “does not require that a chapter 11 case be kept open until all awarded fees and allowed claims have been paid in accordance with the confirmed plan or until the statutory fees here involved have been paid.”); *Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (recognizing that “all of the factors in the Committee Note need not be present before the Court will enter a final decree”).

16. Furthermore, section 1101(2) of the Bankruptcy Code defines substantial consummation as the “(A) transfer of all or substantially all of the property proposed by the plan to be transferred; (B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (C) commencement of distribution under the plan.” 11 U.S.C. § 1101(2).

17. Here, the foregoing factors weigh in favor of closing each of the Affiliate Cases. First, the Confirmation Order is final, non-appealable, and not subject to any pending appeal. Additionally, the Effective Date has occurred, the Affiliate Cases have been “fully administered,” and the Plan has been substantially consummated within the meaning of section 1101(2) of the Bankruptcy Code. Indeed, substantially all distributable property under the Plan has been distributed in accordance with the terms of the Plan (subject to final resolution of certain objections to administrative, priority, and secured claims), and initial funding of the Litigation Trust has occurred. Accordingly, the Plan has been substantially consummated within the meaning of section 1101(2) of the Bankruptcy Code.

18. Although the Wind Down Debtors will pursue resolution of the Remaining Matters, the limited number of issues that will relate to the Affiliate Cases can be handled under the Remaining Case without keeping the Affiliate Cases open. *See* Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991) (“The court should not keep [a] case open only because of the possibility that the court’s jurisdiction may be invoked in the future”).

19. Closing the Affiliate Cases will have no impact on the resolution of pending or future objections to Claims or other contested matters, distributions, or other legal entitlements under the Plan, or the substantive rights of any party in interest. Indeed, the Estates have been substantively consolidated as provided under the Plan and Confirmation Order, and accordingly,

there is in effect only a single Estate to be administered and it is not necessary to keep all 20 Affiliated Cases open.

20. Furthermore, closing the Affiliate Cases will provide the Wind Down Debtors a benefit in the form of reduced fees owed pursuant to section 1930(a)(6) of title 28 of the U.S. Code, which requires that quarterly fees be paid until a debtor's case is closed. Such fees are a financial burden on the Wind Down Debtors and approval of this motion would result in significant savings for the Wind Down Debtors. *See, e.g., In re Jr. Food Mart*, 201 B.R. 522, 524 (Bankr. E.D. Ark. 1996) (recognizing that a court may close a bankruptcy case while retaining jurisdiction over pending adversary proceeding and granting retroactive relief closing bankruptcy case despite pending adversary proceeding); *Jay Bee*, 207 B.R. at 539 (holding that it is "appropriate to close the chapter 11 case to stop the financial drain on the debtor"). All Statutory Fees payable pursuant to section 1930 of title 28 of the United States Code with respect to the Affiliate Cases have been paid, will be paid, or provision for the payment thereof will be made, in the amounts due as soon as reasonably practicable after the closure of the Affiliate Cases.

21. The Wind Down Debtors believe the totality of the circumstances and review of the relevant factors support finding that the Affiliate Cases have been fully administered within the meaning of section 350(a) of the Bankruptcy Code, the Wind Down Debtors have substantially consummated the Plan in respect of the Affiliate Cases, and entry of the Final Decree is appropriate for each Affiliate Case.

22. In addition, the Wind Down Debtors submit that amending the Joint Administration Order to reflect the closure of the Affiliate Cases and ongoing administration under the Remaining Case is appropriate under the circumstances.



23. For the foregoing reasons, the Wind Down Debtors respectfully request that the Court close the Affiliate Cases, direct that Remaining Matters take place in the Remaining Case, and amend the Joint Administration Order accordingly.

**NOTICE**

24. The Wind Down Debtors will provide notice of the Motion to: (i) the U.S. Trustee; (b) the Limited Service List; and (c) the Litigation Trustee or its counsel. The Wind Down Debtors respectfully submit that no further notice of this Motion is required.

**NO PRIOR REQUEST**

25. No prior motion for the relief requested herein has been made to this or any other court.

**CONCLUSION**

**WHEREFORE** the Wind Down Debtors respectfully request that the Court enter the Final Decree, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: October 14, 2025

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

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**EXHIBIT A**

(Proposed Order)

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

In re:

AFH AIR PROS, LLC,

Debtor,

Tax I.D. No. 88-3091228

Chapter 11

Case No. 25-10356 (PMB)

In re:

AIR PROS ATLANTA LLC,

Debtor,

Tax I.D. No. 85-0549512

Chapter 11

Case No. 25-10357 (PMB)

(Jointly Administered Under Case No. 25-10356 (PMB))

In re:  AIR PROS BLUE STAR, LLC,  Debtor,  Tax I.D. No. 84-2711803	Chapter 11  Case No. 25-10358 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS BOCA LLC,  Debtor,  Tax I.D. No. 85-1041091	Chapter 11  Case No. 25-10359 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS COLORADO LLC,  Debtor,  Tax I.D. No. 84-4205526	Chapter 11  Case No. 25-10360 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS DALLAS L.L.C.,  Debtor,  Tax I.D. No. 85-2159408	Chapter 11  Case No. 25-10361 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS ONE SOURCE LLC,  Debtor,  Tax I.D. No. 85-2758103	Chapter 11  Case No. 25-10362 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))

In re:  AIR PROS SOLUTIONS HOLDINGS, LLC,  Debtor,  Tax I.D. No. 88-3543431	Chapter 11  Case No. 25-10363 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS SOLUTIONS, LLC,  Debtor,  Tax I.D. No. 84-3714745	Chapter 11  Case No. 25-10364 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS TEXAS LLC,  Debtor,  Tax I.D. No. 84-2711803	Chapter 11  Case No. 25-10365 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS WASHINGTON, LLP,  Debtor,  Tax I.D. No. 84-4891730	Chapter 11  Case No. 25-10366 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  AIR PROS WEST LLC,  Debtor,  Tax I.D. No. 84-3900418	Chapter 11  Case No. 25-10367 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))

In re:  AIR PROS, LLC,  Debtor,  Tax I.D. No. 82-1033425	Chapter 11  Case No. 25-10368 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  CM AIR PROS, LLC,  Debtor,  Tax I.D. No. 88-3260952	Chapter 11  Case No. 25-10369 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  DALLAS PLUMBING AIR PROS, LLC,  Debtor,  Tax I.D. No. 88-2339861	Chapter 11  Case No. 25-10370 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  DOUG'S SERVICE AIR PROS, LLC,  Debtor,  Tax I.D. No. 87-4760347	Chapter 11  Case No. 25-10371 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  DREAM TEAM AIR PROS, LLC,  Debtor,  Tax I.D. No. 88-3558877	Chapter 11  Case No. 25-10372 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))

In re:  EAST COAST MECHANICAL, LLC,  Debtor,  Tax I.D. No. 65-0163019	Chapter 11  Case No. 25-10373 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  HANSEN AIR PROS, LLC,  Debtor,  Tax I.D. No. 85-3844871	Chapter 11  Case No. 25-10374 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))
In re:  MAUZY AIR PROS, LLC,  Debtor,  Tax I.D. No. 88-3495902	Chapter 11  Case No. 25-10375 (PMB)  (Jointly Administered Under Case No. 25-10356 (PMB))

**FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES AND ORDER  
(A) DIRECTING THAT THE ADMINISTRATION OF ALL REMAINING MATTERS  
IN RESPECT OF AFFILIATE CASES TAKE PLACE IN THE REMAINING CASE,  
(B) AMENDING THE ORDER DIRECTING JOINT ADMINISTRATION OF THE  
CHAPTER 11 CASES, AND (C) GRANTING RELATED RELIEF**

Upon the *Wind Down Debtors' Motion for (A) Entry of a Final Decree Closing Certain of the Chapter 11 Cases; (B) Order Directing that the Administration of All Remaining Matters in Respect of Affiliate Cases Take Place in the Remaining Case; (C) Amendment of the Order Directing Joint Administration of the Chapter 11 Cases; and (D) Granting Related Relief* [Docket No. •] (the "Motion");<sup>1</sup> and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Wind Down Debtors, the Wind Down Debtors' creditors, and other parties in interest; and this Court having found that the Wind Down Debtors provided appropriate notice of the Motion and the opportunity for a hearing on the Motion (the "Hearing") under the circumstances; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at the Hearing, if any; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefore, it is

**HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The following chapter 11 cases of the Wind Down Debtors are hereby closed (the "Affiliate Cases"), provided that this Court shall retain jurisdiction as provided under Article XIII of the Plan:

Debtor	Case No.
Air Pros Atlanta LLC	25-10357
Air Pros Blue Star, LLC	25-10358
Air Pros Boca LLC	25-10359
Air Pros Colorado LLC	25-10360
Air Pros Dallas L.L.C.	25-10361
Air Pros One Source LLC	25-10362
Air Pros Solutions Holdings, LLC	25-10363
Air Pros Solutions, LLC	25-10364
Air Pros Texas LLC	25-10365
Air Pros Washington, LLP	25-10366
Air Pros West LLC	25-10367
Air Pros, LLC	25-10368
CM Air Pros, LLC	25-10369
Dallas Plumbing Air Pros, LLC	25-10370
Doug's Service Air Pros, LLC	25-10371



Debtor	Case No.
Dream Team Air Pros, LLC	25-10372
East Coast Mechanical, LLC	25-10373
Hansen Air Pros, LLC	25-10374
Mauzy Air Pros, LLC	25-10375

3. The chapter 11 case of AFH Air Pros, LLC, Case No. 25-10356 (PMB) (the “Remaining Case”), shall remain open pending further order of the Court. From and after the date of entry of this Order, all motions, notices, and other pleadings, including without limitation any papers initiating any adversary proceeding, relating to any of the Wind Down Debtors or their substantively consolidated Estates shall be filed, administered, and adjudicated in the Remaining Case, without the need to reopen the Affiliate Cases, and the Court shall retain jurisdiction over such matters. The Plan Administrator and/or the Litigation Trustee shall be responsible and deemed authorized to file with the Court all documents required to close the Remaining Case, provided that the Plan Administrator and Litigation Trustee shall confer in good faith prior to either party filing a motion for entry of a Final Decree closing the Remaining Case.

4. The Remaining Matters, whether or not they pertain to the Remaining Case or Affiliate Cases, shall be filed, administered, and adjudicated in the Remaining Case without the need to reopen the Affiliate Cases, and the Court shall retain jurisdiction over the Remaining Matters. Any failure of the Debtors, the Wind Down Debtors, the Plan Administrator, or the Litigation Trustee, as applicable, to file an objection to any Claim or Interest in the Affiliate Cases on or prior to entry of this Final Decree shall not constitute allowance of the Claim or Interest and shall not result in such Claim or Interest being deemed Allowed with respect to any Debtor or Wind Down Debtor or their substantively consolidated Estates. Any objections to Claims against or Interests in the Affiliate Debtors may be filed, administered, and adjudicated in the Remaining Case until the applicable deadline set forth in the Plan, as may be extended from time to time.

5. Nothing in this Order shall prejudice, impair, or otherwise modify the allowance and distribution provisions set forth in the Plan and Confirmation Order.

6. Paragraph 4 of the Amended Joint Administration Order [Docket No. 85] is amended to provide that the Chapter 11 Cases will be jointly administered under AFH Air Pros, LLC, et al., Case No. 25-10356 (PMB). The following caption shall be used in the Remaining Case going forward:

In re:

AFH AIR PROS, LLC,

Wind Down Debtors.

Chapter 11

Case No. 25-10356 (PMB)

<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.

7. The Clerk of Court shall enter this Order on the docket of each of the Affiliate Cases, and each such docket shall be marked as "Closed".

8. The Wind Down Debtors' post-confirmation quarterly report for the period ending December 31, 2025 (the "Fourth Quarter Summary Report") shall include reporting for the Affiliate Cases only through the date of entry of this Order (and not for any subsequent periods). The Statutory Fees due and payable pursuant to 28 U.S.C. § 1930(a)(6)(A) and (B) in connection with the Affiliate Cases shall be calculated based on disbursements only through the date of entry of this Order (and not for any subsequent periods). Subsequent post-confirmation quarterly

summary reports shall contain information for the Remaining Case and the Litigation Trust in accordance with Article II.E of the Plan and the Litigation Trust Agreement.

9. Entry of this Final Decree and Order is without prejudice to (a) the rights of the Wind Down Debtors or other parties in interest to seek to reopen any of the Debtor's chapter 11 cases for cause pursuant to section 350(b) of the Bankruptcy Code, (b) the rights of the Plan Administrator or the Litigation Trustee to dispute all proofs of claim that were filed against the Estates in the Chapter 11 Cases to the extent permitted by the Plan and the Confirmation Order, or (c) the Litigation Trust to bring and pursue claims, causes of action, or otherwise seek relief in connection with the Litigation Trust Assets.

10. Nothing in this Final Decree shall be deemed (a) an admission as to the amount of, basis for, or validity of any Claim against the Debtors or the Wind Down Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the rights of the Wind Down Debtors, the Litigation Trustee, or any other parties in interest to dispute any Claim on any grounds; (c) a promise or requirement to pay any prepetition Claim; (d) an assumption, adoption, or rejection of any agreement, contract, or lease under section 365 of the Bankruptcy Code; (e) an admission as to the validity, enforceability, or perfection of any Lien on, security interest in, or other encumbrance on property of the Debtors' estates; (f) a waiver of any claims or causes of action which may exist against any entity; or (g) a waiver or limitation of the rights of the Wind Down Debtors, or any other parties in interest under the Bankruptcy Code or any other applicable law.

11. The Wind Down Debtors, the Plan Administrator, and their agents are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree in accordance with the Motion.

12. Notwithstanding anything to the contrary, including, but not limited to, the possible applicability of Rules 6004(h), 7062, or 9014 of the Bankruptcy Rules or otherwise, the terms and conditions of this Final Decree shall be immediately effective and enforceable upon its entry.

13. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Final Decree.

14. Wind Down Debtors' counsel will promptly cause a copy of this Order to be served on the Limited Service List for these chapter 11 cases and any parties that were served with the Motion. Wind Down Debtors' counsel shall cause a Certificate of Service evidencing such service to be filed within three days of service.

15. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF DOCUMENT

*Prepared and presented by:*

**GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

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

In re:

AFH AIR PROS, LLC, *et al.*,<sup>1</sup>

Wind Down Debtors.

Chapter 11

Case No. 25-10356 (PMB)

(Jointly Administered)

Objection Deadline: November 14, 2025 at 4:00 p.m. (ET)

Hearing Date: November 18, 2025 at 1:30 p.m. (ET)

**NOTICE OF WIND DOWN DEBTORS' MOTION FOR (A) ENTRY OF A FINAL  
DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES; (B) ORDER  
DIRECTING THAT THE ADMINISTRATION OF ALL REMAINING MATTERS IN  
RESPECT OF AFFILIATE CASES TAKE PLACE IN THE REMAINING CASE;  
(C) AMENDMENT OF THE ORDER DIRECTING JOINT ADMINISTRATION OF THE  
CHAPTER 11 CASES; AND (D) GRANTING RELATED RELIEF,  
DEADLINE TO OBJECT AND HEARING**

On October 14, 2025, AFH Air Pros, LLC and its debtor affiliates (the “Wind Down Debtors”)<sup>2</sup>, filed the *Wind Down Debtors' Motion for (A) Entry of a Final Decree Closing Certain of the Chapter 11 Cases; (B) Order Directing that the Administration of All Remaining Matters in Respect of Affiliate Cases Take Place in the Remaining Case; (C) Amendment of the Order Directing Joint Administration of the Chapter 11 Cases; and (D) Granting Related Relief* (the “Motion”) and related papers with Court seeking an order granting the relief outlined above and in the Motion.

Pursuant to the Fifth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or a hearing if no party-in-interest files a response or objection within 30 days from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at the United States Bankruptcy Court for the Northern District of Georgia, Newnan Division, 18 Greenville Street, Newnan, Georgia 30263, and serve a copy of your response on counsel for the Wind Down Debtors, Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: David B. Kurzweil, Esq. ([KurzweilD@gtlaw.com](mailto:KurzweilD@gtlaw.com)) and Matthew A. Petrie ([PetrieM@gtlaw.com](mailto:PetrieM@gtlaw.com)) and any other**

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

<sup>2</sup> Prior to the occurrence of the Effective Date (as defined, *infra*), the Wind Down Debtors were debtors and debtors in possession (collectively, the “Debtors”) in the Chapter 11 Cases (the “Chapter 11 Cases”).

**appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Clerk on or prior to November 14, 2025, at 4:00 p.m. (prevailing Eastern Time).**

A hearing on the Motion has been scheduled for **November 18, 2025, at 1:30 p.m. (prevailing Eastern Time)** in **Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court's Virtual Hearing Room. The link for the Virtual Hearing Room can be found on Judge Baisier's webpage at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier> and is best used on a desktop or laptop computer but may be used on a phone or tablet. Participants' devices must have a camera and audio. You may also 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](http://www.ganb.uscourts.gov). Please review "Instructions for Appearing by Telephone and Video Conference" located under the "Hearing Information" tab on the judge's webpage prior to the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position unless you are speaking or 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.

If a response to the Motion is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response within the time permitted, the Court may grant the relief requested without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no response is timely filed, but no order is entered granting the relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

**Your rights may be affected. You should read these papers 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..**

Dated: October 14, 2025

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

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