

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

WELLMAD FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

DEBTORS' MOTION SEEKING ENTRY OF AN ORDER (I) SETTING A BAR DATE FOR FILING PROOFS OF CLAIM; (II) SETTING AN AMENDED SCHEDULES BAR DATE; (III) SETTING A REJECTION DAMAGES BAR DATE; (IV) APPROVING THE FORM OF AND MANNER FOR FILING PROOFS OF CLAIM; (V) APPROVING NOTICE OF THE BAR DATES; AND (VI) GRANTING RELATED RELIEF

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) *file this Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner For Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* (this “Motion”). In support of this Motion, the Debtors respectfully represent as follows:

RELIEF REQUESTED²

By this motion, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Bar Date Order”):

- (a) establishing October 20, 2025, at 5:00 p.m., prevailing Eastern Time (the “Claims Bar Date”), as the deadline for each person or entity (including, without limitation,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

² Capitalized terms used in this Relief Requested section of the Motion but not otherwise defined therein shall have the meanings ascribed to such terms later in the Motion.



individuals, partnerships, corporations, joint ventures, and trusts), other than governmental units, to file proofs of claim based on prepetition claims, (collectively, the “Proofs of Claim”) against any Debtor, including, without limitation, any secured claim, unsecured claim, priority claim or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days before the Petition Date, unless otherwise provided in this Motion;

- (b) establishing March 9, 2026, at 5:00 p.m., prevailing Eastern Time (the “Governmental Bar Date”), as the deadline for governmental units, as defined in section 101(27) of the Bankruptcy Code, to file Proofs of Claims against any Debtor;
- (c) establishing the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days from the date on which the Debtors provide notice of a previously unfiled Schedule (as defined herein) or an amendment or supplement to the Schedules as the deadline (the “Amended Schedules Bar Date”) by which claimants holding claims affected by such filing, amendment, or supplement must file Proofs of Claim with respect to such claim;
- (d) establishing the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) the date set by the Court in an order approving the rejection of any executory contract or unexpired lease of the Debtors as the deadline (the “Rejection Damages Bar Date,” and together with the other bar dates requested herein, the “Bar Dates”) by which claimants asserting claims resulting from the Debtors’ rejection of an executory contract or unexpired lease must file Proofs of Claim for damages arising from such rejection;
- (e) approving the form of and manner for filing Proofs of Claim;
- (f) approving notice of the Bar Dates, including the proposed form of such notice; and
- (g) granting related relief.

JURISDICTION AND VENUE

1. This Court has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This 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 bases for the relief requested herein are sections 105(a) and 501 of Title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002 and 3003 of the Federal Rules of

Bankruptcy Procedure (the “Bankruptcy Rules”), Rules 9006-2, 9013-1, 9013-2 of the Local Rules of Practice for the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), and the Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases, dated February 6, 2023 (the “Complex Case Procedures”).

BACKGROUND

3. On August 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”). The Debtors have continued in possession of their properties and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner in these cases.

4. On August 7, 2025, the Court entered the *Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 25] authorizing the joint administration and procedural consolidation of the chapter 11 cases pursuant to Bankruptcy Rule 1015(b).

5. On August 14, 2025, the United States Trustee for the Northern District of Georgia (the “U.S. Trustee”) appointed the official committee of unsecured creditors (the “Committee”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 59].

6. The factual background relating to the Debtors’ commencement of these cases is set forth in detail in the *Declaration of David Baker in Support of Chapter 11 Petitions and First*

Day Pleadings [Docket No. 14] (the “First Day Declaration”) filed on or about the Petition Date and incorporated herein by reference.³

RELIEF REQUESTED

7. Bankruptcy Rule 3003(c)(3) provides that the court shall fix the time within which proofs of claim must be filed in a chapter 11 case pursuant to section 501 of the Bankruptcy Code. Moreover, Bankruptcy Rule 3003(c)(2) provides that any creditor who has a claim against a debtor that arose prior to the Petition Date, and whose claim is not scheduled in such debtor’s schedules of assets and liabilities, schedules of executory contracts and unexpired leases, and statements of financial affairs or whose claim is listed on such schedules as disputed, contingent, or unliquidated, must file a Proof of Claim.

8. The Debtors propose to allow at least thirty-five (35) days’ notice of the Claims Bar Date, one hundred-eighty (180) days for the Governmental Bar Date, at least thirty (30) days’ notice of the Amended Schedules Bar Date, and at least thirty (30) days’ notice of the Rejection Damages Bar Date. 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. If approved, the proposed Claims Bar Date would occur at least thirty-five (35) days after the proposed date of service of the Bar Date Notice (as defined herein) as set forth herein.

A. Claims Bar Date

9. The Debtors request that the Court establish October 20, 2025, at 5:00 p.m., prevailing Eastern Time, as the Claims Bar Date. The Claims Bar Date would be the date by which all persons and entities, other than governmental units, holding or asserting prepetition claims against any Debtor must file Proofs of Claim, so that such Proofs of Claim are received by

³ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the First Day Declaration.

Kurtzman Carson Consultants, LLC d/b/a Verita Global, the Debtors' claims and noticing agent (the "Claims and Noticing Agent"), on or before the Claims Bar Date, unless such entity's claim falls within one of the exceptions set forth in this Motion. Subject to these exceptions, the Claims Bar Date would apply to all claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date, including, without limitation, secured claims, unsecured priority claims, unsecured non-priority claims, and claims arising under section 503(b)(9) of the Bankruptcy Code.

10. The Debtors also propose that the filing of a Proof of Claim be deemed to satisfy the procedural requirements for the assertion of administrative priority claims under Bankruptcy Code section 503(b)(9) (which, despite the administrative priority status, are prepetition claims).

11. Any claimant asserting a claim pursuant to Bankruptcy Code section 503(b)(9) (each, a "503(b)(9) Claim") must (i) complete the appropriate box in the Proof of Claim Form and, thereby, identify the amount of such claim believed to be entitled to administrative expense priority treatment under Bankruptcy Code section 503(b)(9) and (ii) attach documentation supporting such claim. To the extent that a claimant fails to identify the existence and amount of its 503(b)(9) Claim on the Proof of Claim Form, the claim will not be regarded as a 503(b)(9) Claim, and the claim will not be entitled to priority treatment under Bankruptcy Code section 503(b)(9).

B. Governmental Bar Date

12. Section 502(b)(9) of the Bankruptcy Code provides that "a claim of a governmental unit shall be timely filed if it is filed before 180 days after the date of the order for relief or such later time as the Federal Rules of Bankruptcy Procedure may provide." 11 U.S.C. § 502(b)(9)(A).

13. The Debtors request that the Court establish March 9, 2026, at 5:00 p.m., prevailing Eastern Time, as the Governmental Bar Date. The Governmental Bar Date would be the date by which all governmental units, holding prepetition claims against any Debtor must file Proofs of

Claim, so that such Proofs of Claim are received by the Claims and Noticing Agent on or before the Governmental Bar Date, unless such entity's claim falls within one of the exceptions set forth in this Motion. Subject to these exceptions, the Governmental Bar Date would apply to all claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date, including, without limitation, secured claims, unsecured priority claims, and unsecured non-priority claims.

C. Amended Schedules Bar Date

14. In the event the Debtors file a previously unfiled schedule or amend or supplement their schedules of assets and liabilities filed pursuant to Bankruptcy Rule 1009 (collectively, the "Schedules"), the Debtors propose that the Court establish the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable depending on the claimant, or (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days from the date on which the Debtors provide notice of the previously unfiled Schedule or amendment or supplement to the Schedules, as the deadline on or before which claimants holding claims affected by such filing, amendment, or supplement must file Proofs of Claim with respect to such claim so that such Proofs of Claim are received by the Claims and Noticing Agent on or before the Amended Schedules Bar Date. In particular, an entity whose claim is added or removed from the Schedules, changed in respect of amount or priority, or designated as contingent, unliquidated, or disputed when it previously was not so designated, shall be given notice of the Amended Schedule Bar Date and shall be required (to the extent necessary to dispute any such amendment) to file, amend, or supplement a proof of claim by such date.

D. Rejection Damages Bar Date

15. The Debtors propose that the Court establish the later of: (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) the date set by the Court in an order approving

the rejection of any executory contract or unexpired lease of the Debtors, as the deadline on or before which claimants holding claims for damages arising from such rejection must file Proofs of Claim with respect to such damages so that such Proofs of Claim are received by the Claims and Noticing Agent on or before the Rejection Damages Bar Date.

Proposed Procedures for Submitting Proofs of Claim

A. Parties Required to Submit a Proof of Claim

16. Except as otherwise set forth herein, the Debtors propose that the following entities holding claims against the Debtors arising prior to the Petition Date be required to file Proofs of Claim on or before the applicable Bar Date:

- (a) any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed as "contingent," "unliquidated," or "disputed" and if such entity desires to participate in any of these chapter 11 cases or share in any distribution in any of these 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 that any claim 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 different Debtor;
- (d) any entity that believes that its claim asserts administrative priority and arising in the ordinary course of business (but not, for the avoidance of doubt, claims asserting priority pursuant to 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 a Debtor and has not previously filed any such claim; and
- (f) any person or entity who asserts a claim arising from or related to pending or threatened litigation against a Debtor.

B. Parties Not Required to File Proofs of Claim

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

- (a) any entity that already has filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with the Claims and Noticing Agent in a form substantially similar to Official Form 410;
- (b) any entity whose claim is listed on the Schedules if: (i) the claim is not scheduled as “disputed,” “contingent,” or “unliquidated;” (ii) such entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;
- (c) the DIP Lender and the Prepetition Lender;
- (d) any entity whose claim previously has been allowed by order of the Court;
- (e) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
- (f) any Debtor or non-Debtor subsidiary having a claim against another Debtor;
- (g) any entity whose claim is solely against any of the Debtors’ non-Debtor affiliates;
- (h) any holder of an equity interest in a Debtor need not file a proof of interest with respect to the ownership of such equity interest at this time; provided, however, that any holder of an equity interest who wishes to assert a claim against a Debtor, including a claim relating to such equity interest or the purchase or sale of such interest, must file a proof of claim asserting such claim on or prior to the Claims Bar Date pursuant to procedures set forth herein;
- (i) an employee of any Debtor holding a claim for wages, commissions, or benefits if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business; provided, however, that a current or former employee must submit a Proof of Claim by the Claims Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation, as applicable;
- (j) any entity holding a claim for which a separate deadline is fixed by the Court;
- (k) any entity that is exempt from filing a Proof of Claim by order of the Court; and
- (l) administrative expense claims for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, and 503(b) of the Bankruptcy Code.

18. Persons or entities who have already filed proofs of claim that comply with the procedures set forth in the Bar Date Order prior to entry of the Bar Date Order shall not be required to refile such Proofs of Claim.

C. Form of Proofs of Claim

19. The Debtors request that the Court require creditors to use Official Form 410, which is annexed as **Exhibit 1** to the proposed Bar Date Order (the “Proof of Claim Form”), to file Proofs of Claims.

20. If a creditor disagrees with any of the information set forth in the Schedules, the creditor is required to file a Proof of Claim identifying the Debtor against which the creditor is asserting a claim and the amount and type of such claim. Additionally, any party that believes it has a claim against any of the Debtors which claim is not identified in the Schedules, and wishes to assert such claim, must file a Proof of Claim.

D. Requirements for Preparing and Submitting Proofs of Claim

21. 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) include a claim amount denominated in United States dollars (using the Petition Date rate of conversion, if applicable); (iii) conform substantially with the Proof of Claim Form or Official Form 410; and (iv) be signed under penalty of perjury by the claimant or by an authorized agent or legal representative of the claimant.
- (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. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted.
- (c) Identification of the Debtor Entity. Each Proof of Claim must clearly identify the Debtor against which the claim is being asserted, including such Debtor’s individual case number. A Proof of Claim filed under the joint administration case number (No. 25-58764) or otherwise without identifying a specific Debtor, will be deemed filed only against Debtor Wellmade Floor Coverings International, Inc.
- (d) Claim Against Multiple Debtors. Each Proof of Claim must state a claim against only one Debtor. If a creditor has a claim against multiple Debtors, it must file a separate Proof of Claim against each such Debtor. If more than one Debtor is listed on a single Proof of Claim, the asserted claim will be deemed filed only against the first-listed Debtor. If the

claimant asserts a claim against more than one Debtor or has claims against different Debtors, a separate Proof of Claim must be filed with respect to each Debtor.

- (e) Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).
- (f) Timely Filing. Each Proof of Claim (including supporting documentation) must be filed so as to be received, on or before the applicable Bar Date by either: (i) electronically using the interface available on the Notice and Claims Agent's website at <https://veritaglobal.net/wellmade>; or (ii) first-class U.S. Mail, overnight mail, or other hand-delivery system, which Proof of Claim must include an original signature, at the following address:

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

Proofs of claim submitted by facsimile or electronic mail will not be accepted and will not be deemed timely FILED.

- (g) Receipt of Service. Claimants wishing to receive acknowledgment that their Proofs of Claim were timely received by the Claims and Noticing Agent 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.

E. Consequences of Failure to File a Proof of Claim

22. Pursuant to Bankruptcy Rule 3003(c)(2), the Debtors propose that any entity who is required, but fails, to file a Proof of Claim in accordance with the Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against any of the Debtors and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to or arising from such claim.

Procedures for Providing Notice of the Bar Dates

23. The Debtors propose the following procedures for providing mailing and publication notice of the Bar Dates.

A. Mailing of the Bar Date Notice

24. Pursuant to Bankruptcy Rule 2002(a)(7), on or before September 19, 2025, the Debtors propose to cause written notice of the Bar Dates, substantially in the form annexed as **Exhibit 2** to the proposed Bar Date Order (the “Bar Date Notice”), and a Proof of Claim Form (collectively, the “Bar Date Package”) to be mailed via first-class U.S. mail or, solely with respect to the Debtors’ former employees with valid e-mail addresses, electronic mail, to the following entities:

- (a) the Office of the U.S. Trustee;
- (b) the Office of the United States Attorney for the Northern District of Georgia and for the other federal districts in which the Debtors conduct business;
- (c) counsel to the Committee;
- (d) all creditors and holders of potential claims against the Debtors, in each case, known as of the date of the Bar Date Order, including all persons or entities listed in the Schedules for which the Debtors have addresses;
- (e) each of the parties on the limited service list maintained by the Claims and Noticing Agent (the “Limited Service List”);
- (f) all creditors and other known holders of claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors;
- (g) all persons or entities that, upon reasonable inquiry, are believed to have conducted business with the Debtors;
- (h) all entities that have requested notice of the proceedings in these chapter 11 cases pursuant to Bankruptcy Rule 2002 as of the date the Bar Date Order is entered;
- (i) all entities that have filed Proofs of Claim in these chapter 11 cases as of the date of the Bar Date Order;
- (j) all known non-Debtor holders of equity interests in the Debtors as of the date the Bar Date Order is entered;
- (k) all entities who are party to executory contracts and unexpired leases with the Debtors;

- (l) all entities who are party to pending or threatened litigation with the Debtors as of the date of the entry of the Bar Date Order;
- (m) all current and former employees (to the extent that contact information for former employees is available in the Debtors' records, the Debtors shall cause written notice of the Bar Date package to be provided only through electronic mail to such former employees);
- (n) all regulatory authorities that regulate the Debtors' businesses;
- (o) all taxing authorities for the jurisdictions in which the Debtors maintain or conduct business;
- (p) the state attorneys general for states in which the Debtors conduct business;
- (q) the United States Internal Revenue Service;
- (r) all parties of utility services to the Debtors, including past providers who provided services within three (3) years of the Petition Date;
- (s) the Debtors' current insurance providers, the Debtors' past insurance providers under whose policies open claims remain pending, and the Debtors' past insurance providers who provided coverage within three (3) years before the Petition Date, regardless of whether a claim is currently pending in respect of such coverage;
- (t) the Debtors' ordinary course professionals;
- (u) the Debtors' banks; and
- (v) all parties included on the creditor matrix filed in these chapter 11 cases.

25. The proposed Bar Date Notice notifies the parties of the Bar Dates and contains information regarding who must file a Proof of Claim, the procedures for filing a Proof of Claim, and the consequences of failure to timely file a Proof of Claim. The Debtors request that the Court approve the Bar Date Notice. The publication version of the Bar Date Notice will be substantially similar to the attached Bar Date Notice and will only omit provisions that are not applicable or are not absolutely necessary (such as the official definition of "claim") to reduce publication and mailing costs, as applicable.

B. Supplemental Mailings

26. After the initial mailings of the Bar Date Packages, the Debtors may, in their discretion, make supplemental mailings of notices, including in the event that: (a) notices are returned by the post office with forwarding addresses;⁴ (b) certain parties acting on behalf of parties in interest (e.g., banks and brokers with respect to equity interest holders) decline to pass along notices to these parties and instead provide their names and addresses to the Debtors for direct mailing; and (c) additional potential claimants become known to the Debtors. In these and similar circumstances, the Debtors request that the Court permit them to make supplemental mailings of the Bar Date Package at any time up to twenty-one (21) days in advance of the Bar Date, with any such mailings deemed timely and the applicable Bar Date being enforced against the relevant creditors.

C. Publication Notice

27. In the interest of ensuring that all potential claimants receive adequate notice of the Bar Dates, in addition to mailing the Bar Date Notice to known creditors and potential creditors, the Debtors propose to provide notice of the Bar Dates by publication. In accordance with Bankruptcy Rule 2002(l), the Debtors propose to publish the Bar Date Notice, modified for publication in substantially the form annexed as **Exhibit 3** to the proposed Bar Date Order (the “Publication Notice”), on one occasion in the The Wall Street Journal (National Edition).

28. The proposed Publication Notice includes a telephone number that creditors may call to obtain copies of the Proof of Claim Form, the URL for a website at which creditors may obtain a copy of a Proof of Claim Form, and information concerning the procedures and appropriate deadlines for filing Proofs of Claim.

⁴ However, if notices are returned as “return to sender” without a forwarding address, the Debtors respectfully request that they should not be required to mail additional notices to such creditors.

BASIS FOR RELIEF

A. Ample Authority Exists to Approve the Bar Dates and the Proposed Procedures for Filing Proofs of Claim in these Chapter 11 Cases

29. Bankruptcy Rule 3003(c)(3) generally governs the filing of proofs of claim in a chapter 11 case and provides, in relevant part, that “[t]he court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed.” Fed. R. Bankr. P. 3003(c)(3). Although Bankruptcy Rule 2002(a)(7) generally provides that all parties in interest must receive, at a minimum, twenty-one (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 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 relating to governmental units).

30. It is well recognized that the claims bar date plays an essential role in the twin goals 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). The 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).

31. 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.

32. The proposed procedures 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 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).

B. The Proposed Procedures Are Reasonable and Appropriate

33. Bankruptcy Rule 2002(a)(7) requires that the Debtors provide claimants at least twenty-one (21) days' notice by mail of the Bar Dates pursuant to Bankruptcy Rule 3003(c). *See* Fed. R. Bankr. P. 2002(a)(7). Additionally, Bankruptcy Rule 2002(l) provides that the Court may order notice by publication if it finds that notice by mail is impractical or it is desirable to supplement other notice. *See* Fed. R. Bankr. P. 2002(l). Bankruptcy Rule 9008 also provides that the Court shall determine the form and manner of publication notice, the newspapers used, and the frequency of publication. *See* Bankruptcy Rule 9008.

34. In conjunction with setting deadlines for filing Proofs of Claim, the Debtors must give appropriate notice to interested parties. The Debtors propose to mail the Bar Date Notice to their known creditors and potential creditors, and rely on publication to give notice to their unknown creditors.

35. To determine the adequacy of notice to a creditor, the case law distinguishes between "known" and "unknown" creditors. Generally speaking, the former is a creditor (or

potential creditor) whose identity is either known or is reasonably ascertainable by the debtor, while the latter is one whose identity, although potentially discoverable upon investigation, does not come to the knowledge of the debtor in the ordinary course of business. *See Tulsa Prof'l Collection Serv., Inc. v. Pope*, 485 U.S. 478, 490 (1988) (holding that notice is required to parties whose name and address are “reasonably ascertainable”); *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 317 (1950) (publication is acceptable where it is not “reasonably possible or practicable to give more adequate warning,” whereas when names and addresses are available, notice must be mailed).

36. Where a creditor is known to the debtor, due process requires that the debtor must take reasonable steps, such as direct mailing, to provide actual notice of the deadline for filing a proof of claim. A creditor's identity is “reasonably ascertainable” if that creditor can be identified through “reasonably diligent efforts.” *Mennonite Bd. of Missions v. Adams*, 462 U.S. 791, 798 n.4 (1983). But this does not require the debtor to engage in “impracticable and extended searches . . . in the name of due process.” *See Mullane*, 339 U.S. at 317. Rather, the required search is limited to a debtor's “books and records.” *See, e.g., Chemetron*, 72 F.3d at 347. Notification by publication will generally suffice for unknown creditors. *See, e.g., In re Anchor Glass Container Corp.*, 325 B.R. 892, 895 (Bankr. M.D. Fla. 2005) (citing *Matter of GAC Corp.*, 681vF.2d 1295, 1300 (11th Cir. 1982)) (“The Eleventh Circuit has recognized that publication notice is legally adequate notice to unknown creditors.”); *In re Charter Co.*, 125 B.R. at 655 (“[P]ublication notice is sufficient for those creditors whom the debtor can reasonably assume to have abandoned their property interest.”); *In re XO Commc'ns*, 301 B.R. 782, 793 (Bankr. S.D.N.Y. 2003) (finding that if a creditor is unknown constructive notice is generally sufficient); *DePippo v. Kmart Corp.*, 335 B.R. 290, 296 (S.D.N.Y. 2005) (“It is well-settled that when a creditor is ‘unknown’ to the debtor,

publication notice of the claims bar date is adequate constructive notice sufficient to satisfy due process requirements”). Furthermore, debtors are not required to publish notice in an excessive number of publications. See *In re Best Prods. Co., Inc.*, 140 B.R. 353 (Bankr. S.D.N.Y. 1992) (finding it impracticable to expect a debtor to publish notice in every newspaper that an unknown creditor possibly may read).

37. The Debtors submit that the relief requested herein provides for clear notice of the Bar Dates in satisfaction of the requirements of the Bankruptcy Rules and consistent with the underlying policies of the Bankruptcy Code. Specifically, the Debtors intend to (a) cause the Bar Date Packages to be mailed on or before September 19, 2025, and (b) cause the Publication Notice to be published by a date that is at least twenty-one (21) days prior to the Bar Dates. Thus, by establishing the Bar Dates in accordance with the provisions hereof, all known claimants and potential claimants will have more than thirty-one (31) days actual notice, and unknown or unreachable claimants will have at least twenty-one (21) days of constructive notice of the Bar Dates, thereby satisfying Bankruptcy Rule 2002(a)(7).

38. In addition, in the event the Debtors file a previously unfiled Schedule or amend or supplement the Schedules subsequent to the date on which the Debtors serve the Bar Date Notice, the Debtors shall give notice of any filing, amendment, or supplement to the holders of affected claims whereby such holders will have no less than thirty (30) days from the notice date to file Proofs of Claim with respect to their claims. Moreover, unless otherwise ordered by the Court, and in the event the Debtors reject an executory contract or unexpired lease, holders of claims arising from such rejection, if any, will have no less than thirty (30) days from the notice date to file Proofs of Claim with respect to their claims.

39. Accordingly, the Debtors respectfully submit that the Bar Dates and the form and manner of providing notice thereof are appropriate in light of the circumstances, inure to the benefit of all parties in interest, and should be approved.

RESERVATION OF RIGHTS

40. Nothing contained in this Motion or any actions taken by the Debtors pursuant to any order granting the relief requested by this Motion is intended or should be construed as: (a) an admission to the validity, priority, or amount of any particular claim against the Debtors; (b) a waiver of the Debtors' right to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion; (e) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law; or (f) a concession by the Debtors or any other party-in-interest that any liens (contractual, common law, statutory, or otherwise) satisfied pursuant to this Motion are valid and the Debtors and all other parties-in-interest expressly reserve their rights to contest the extent, validity, or perfection, or seek avoidance of all such liens.

NOTICE

41. Notice of this Motion has been provided to the Limited Service List. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

NO PRIOR REQUEST

42. No prior request for the relief sought in the motion has been made to this or any other court.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, (a) granting the relief requested herein, and (b) granting such other relief as is just and proper.

Dated: September 4, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod (Ga. Bar. No. 246604)

Allison J. McGregor (Ga. Bar. No. 860865)

Terminus 200

3333 Piedmont Road, NE, Suite 2500

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Allison.McGregor@gtlaw.com

*Proposed Counsel for the Debtors and
Debtors in Possession*

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**ORDER (I) SETTING A BAR DATE FOR FILING PROOFS OF
CLAIM; (II) SETTING AN AMENDED SCHEDULES BAR DATE; (III) SETTING A
REJECTION DAMAGES BAR DATE; (IV) APPROVING THE FORM OF AND
MANNER FOR FILING PROOFS OF CLAIM; (V) APPROVING NOTICE OF THE BAR
DATES; AND (VI) GRANTING RELATED RELIEF**

This matter is before the Court on the *Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner For Filing Proofs of Claim;*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

(V) *Approving Notice of the Bar Dates*; and (VI) *Granting Related Relief* (the “Motion”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”).²

Upon the Motion of the Debtors for entry of an order (this “Bar Date Order”) (a) establishing the bar dates for filing proofs of claim in these chapter 11 cases; (b) establishing the bar date for filing proofs of claim following the Debtors’ amendment of their Schedules; (c) establishing the bar date for filing proofs of claim for damages arising from the Debtors’ rejection of executory contracts or unexpired leases; (d) approving the form of and manner for filing proofs of claim; (e) approving notice of the Bar Dates; and (f) granting related relief; all as more fully set forth in the Motion; and this Court having 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 to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; 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 Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; the Court having heard the statements of counsel in support of the relief requested therein at a hearing held on [], 2025 (the “Hearing”); and this 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 this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

² All capitalized terms used but not defined herein shall have the meanings given to them in the Motion.

1. The Motion is **GRANTED** as set forth herein.

A. The Bar Dates and Procedures for Filing Proofs of Claim

2. Each entity that asserts a claim against the Debtors that arose before the Petition Date is required to file an original, written Proof of Claim, substantially in the form attached hereto as **Exhibit 1** or Official Form 410. Except in the cases of governmental units and certain other exceptions explicitly set forth herein, all Proofs of Claim must be filed so that they are received on or before October 20, 2025, at 5:00 p.m., prevailing Eastern Time (the “Claims Bar Date”), at the addresses and in the form set forth herein. The Claims Bar Date applies to all types of claims against the Debtors that arose or are deemed to have arisen before the Petition Date, except for claims specifically exempt from complying with the Claims Bar Date as set forth in this Bar Date Order.

3. Except as otherwise provided for herein, all governmental units, holding prepetition claims against any Debtor must file Proofs of Claim, so that such Proofs of Claim are received by the Claims and Noticing Agent on or before March 9, 2026, at 5:00 p.m., prevailing Eastern Time (the “Governmental Bar Date”). Unless otherwise stated herein, the Governmental Bar Date shall apply to all claims against the Debtors that arose or are deemed to have arisen prior to the Petition Date, including, without limitation, secured claims, unsecured priority claims, and unsecured non-priority claims.

4. If the Debtors file a previously unfiled Schedule or amend or supplement the Schedules after having given notice of the Bar Dates, the Debtors shall give notice by first-class mail or, solely with respect to the Debtors’ former employees with valid e-mail addresses, electronic mail, of any filing, amendment, or supplement to holders of claims affected thereby, and the deadline for those holders to file Proofs of Claim, if necessary, shall as the later of (a) the

Claims Bar Date or the Governmental Bar Date, as applicable, or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days from the date the notice of the filing, amendment or supplement is given (or another time period as may be fixed by the Court) (the “Amended Schedules Bar Date”).

5. Unless otherwise ordered, all entities asserting claims arising from the rejection of executory contracts and unexpired leases of the Debtors shall file a Proof of Claim on account of such rejection by the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable; or (b) the date set by the Court in an order approving the rejection of any such executory contract or unexpired lease (the “Rejection Damages Bar Date”).

6. All Proofs of Claim must be filed so as to be received by the Claims and Noticing Agent on or before the applicable Bar Date. If Proofs of Claim are not received by the Claims and Noticing Agent on or before the applicable Bar Date, the holders of the underlying claims shall be barred from asserting such claims against the Debtors and precluded from voting on any chapter 11 plans filed in these chapter 11 cases and/or receiving distributions from the Debtors on account of such claims in these chapter 11 cases.

B. Parties Required to Submit a Proof of Claim

7. The following categories of claimants shall be required to file a Proof of Claim by the applicable Bar Date:

- (a) any entity whose claim against a Debtor is not listed in the applicable Debtor’s Schedules or is listed as “contingent,” “unliquidated,” or “disputed” and if such entity desires to participate in any of these chapter 11 cases or share in any distribution in any of these 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 that any claim 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 different Debtor;
- (d) any entity that believes that its claim asserts administrative priority and arising in the ordinary course of business (but not, for the avoidance of doubt, claims asserting priority pursuant to 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 a Debtor and has not previously filed any such claim; and
- (f) any person or entity who asserts a claim arising from or related to pending or threatened litigation against a Debtor.

C. Parties Not Required to File Proofs of Claim

8. The following categories of claimants shall not be required to file a Proof of Claim:

- (a) any entity that already has filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with the Claims and Noticing Agent in a form substantially similar to Official Form 410;
- (b) any entity whose claim is listed on the Schedules if: (i) the claim is not scheduled as “disputed,” “contingent,” or “unliquidated;” (ii) such entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) such entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;
- (c) the DIP Lender and the Prepetition Lender;
- (d) any entity whose claim previously has been allowed by order of the Court;
- (e) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
- (f) any Debtor or non-Debtor subsidiary having a claim against another Debtor;
- (g) any entity whose claim is solely against any of the Debtors’ non-Debtor affiliates;
- (h) any holder of an equity interest in a Debtor need not file a proof of interest with respect to the ownership of such equity interest at this time; provided, however, that any holder of an equity interest who wishes to assert a claim against a Debtor, including a claim relating to such equity interest or the purchase or sale of such interest, must file a proof of claim asserting such claim on or prior to the Claims Bar Date pursuant to procedures set forth herein;

- (i) an employee of any Debtor holding a claim for wages, commissions, or benefits if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business; provided, however, that a current or former employee must submit a Proof of Claim by the Claims Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation, as applicable;
- (j) any entity holding a claim for which a separate deadline is fixed by the Court;
- (k) any entity that is exempt from filing a Proof of Claim by order of the Court; and
- (l) administrative expense claims for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, and 503(b) of the Bankruptcy Code.

9. Persons or entities who have already filed proofs of claim that comply with the procedures set forth in the Bar Date Order prior to entry of the Bar Date Order shall not be required to refile such Proofs of Claim.

D. Substantive Requirements of Proofs of Claim

10. The following requirements shall apply with respect to filing and preparing each Proof of Claim:

- (a) Contents. Each Proof of Claim must: (i) be legible and written in English; (ii) include a claim amount denominated in United States dollars (using the Petition Date rate of conversion, if applicable); (iii) conform substantially with the Proof of Claim Form or Official Form 410; and (iv) be signed under penalty of perjury by the claimant or by an authorized agent or legal representative of the claimant.
- (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. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted.
- (c) Identification of the Debtor Entity. Each Proof of Claim must clearly identify the Debtor against which the claim is being asserted, including such Debtor's individual case number. A Proof of Claim filed under the joint administration case number (No. 25-58764) or otherwise without identifying a specific Debtor, will be deemed filed only against Debtor Wellmade Floor Coverings International, Inc.
- (d) Claim Against Multiple Debtors. Each Proof of Claim must state a claim against only one Debtor. If a creditor has a claim against multiple Debtors, it must file a separate Proof of Claim against each such Debtor. If more than one Debtor is listed on a single Proof of

Claim, the asserted claim will be deemed filed only against the first-listed Debtor. If the claimant asserts a claim against more than one Debtor or has claims against different Debtors, a separate Proof of Claim must be filed with respect to each Debtor.

- (e) Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).
- (f) Timely Filing. Each Proof of Claim (including supporting documentation) must be filed so as to be received, on or before the applicable Bar Date by either: (i) electronically using the interface available on the Notice and Claims Agent's website at <https://veritaglobal.net/wellmade>; or (ii) first-class U.S. Mail, overnight mail, or other hand-delivery system, which Proof of Claim must include an original signature, at the following address:

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

Proofs of claim submitted by facsimile or electronic mail will not be accepted and will not be deemed timely FILED.

- (g) Receipt of Service. Claimants wishing to receive acknowledgment that their Proofs of Claim were timely received by the Claims and Noticing Agent 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.

E. Identification of Known Creditors

- 11. The Debtors shall mail notice of the Bar Dates only to their known creditors, and such mailing shall be made to the last known mailing address for each such creditor.

F. Procedures for Providing Notice of Bar Date

a. Mailing of the Bar Date Notice

- 12. On or before September 19, 2025, the Debtors shall cause written notice of the Bar Dates, substantially in the form attached hereto as **Exhibit 2** (the "Bar Date Notice"), and a Proof of Claim Form (collectively, the "Bar Date Package") to be mailed via first-class U.S. mail or, solely with respect to the Debtors' former employees with valid e-mail addresses, electronic mail, to the following entities:

- (a) the Office of the U.S. Trustee;
- (b) the Office of the United States Attorney for the Northern District of Georgia and for the other federal districts in which the Debtors conduct business;
- (c) counsel to the Committee;
- (d) all creditors and holders of potential claims against the Debtors, in each case, known as of the date of the Bar Date Order, including all persons or entities listed in the Schedules for which the Debtors have addresses;
- (e) each of the parties on the limited service list maintained by the Claims and Noticing Agent (the “Limited Service List”);
- (f) all creditors and other known holders of claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors;
- (g) all persons or entities that, upon reasonable inquiry, are believed to have conducted business with the Debtors;
- (h) all entities that have requested notice of the proceedings in these chapter 11 cases pursuant to Bankruptcy Rule 2002 as of the date the Bar Date Order is entered;
- (i) all entities that have filed Proofs of Claim in these chapter 11 cases as of the date of the Bar Date Order;
- (j) all known non-Debtor holders of equity interests in the Debtors as of the date the Bar Date Order is entered;
- (k) all entities who are party to executory contracts and unexpired leases with the Debtors;
- (l) all entities who are party to pending or threatened litigation with the Debtors as of the date of the entry of the Bar Date Order;
- (m) all current and former employees (to the extent that contact information for former employees is available in the Debtors’ records, the Debtors shall cause written notice of the Bar Date package to be provided only through electronic mail to such former employees);
- (n) all regulatory authorities that regulate the Debtors’ businesses;
- (o) all taxing authorities for the jurisdictions in which the Debtors maintain or conduct business;
- (p) the state attorneys general for states in which the Debtors conduct business;

- (q) the United States Internal Revenue Service;
- (r) all parties of utility services to the Debtors, including past providers who provided services within three (3) years of the Petition Date;
- (s) the Debtors' current insurance providers, the Debtors' past insurance providers under whose policies open claims remain pending, and the Debtors' past insurance providers who provided coverage within three (3) years before the Petition Date, regardless of whether a claim is currently pending in respect of such coverage;
- (t) the Debtors' ordinary course professionals;
- (u) the Debtors' banks; and
- (v) all parties included on the creditor matrix filed in these chapter 11 cases.

13. The Debtors shall provide all known creditors listed in the Schedules with a Proof of Claim Form. Additionally, any creditor may choose to submit a Proof of Claim on a different form as long as it is substantially similar to Official Form 410.

14. After the initial mailing of the Bar Date Packages the Debtors may, in their discretion, make supplemental mailings of notices or packages, including in the event that: (a) notices are returned by the post office with forwarding addresses; (b) certain parties acting on behalf of parties in interest decline to pass along notices to these parties and instead return their names and addresses to the Debtors for direct mailing, and (c) additional potential claimants become known as the result of the Bar Date mailing process. In this regard, the Debtors may make supplemental mailings of the Bar Date Packages in these and similar circumstances at any time up to twenty-one (21) days in advance of the Bar Date, with any such mailings being deemed timely and the appropriate Bar Date being applicable to the recipient creditors.

b. Publication of the Bar Date Notice

15. The Debtors shall cause notice of the Bar Dates to be given by publication to creditors to whom notice by mail is impracticable, including creditors who are unknown or not

reasonably ascertainable by the Debtors and creditors whose identities are known but whose addresses are unknown by the Debtors. Specifically, the Debtors shall cause the Publication Notice, in substantially the form annexed hereto as **Exhibit 3**, to be published on one occasion in the The Wall Street Journal (National Edition).

G. Consequences of Failure to File a Proof of Claim

16. Any entity who is required, but fails, to file a Proof of Claim in accordance with this Bar Date Order on or before the applicable Bar Date shall be forever barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a Proof of Claim with respect thereto) and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to or arising from such claim.

H. Miscellaneous

17. The Debtors are authorized to take all actions necessary or appropriate to effectuate the relief granted pursuant to this Bar Date Order in accordance with the Motion.

18. The terms and conditions of this Bar Date Order shall be immediately effective and enforceable upon entry of the Bar Date Order.

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

20. Proposed counsel for the Debtors, through Kurtzman Carson Consultants, LLC d/b/a Verita Global (“Verita”) shall, within three (3) days of the entry of this Bar Date Order, cause a copy of this Bar Date Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Motion, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod (Ga. Bar. No. 246604)

Allison J. McGregor (Ga. Bar. No. 860865)

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3333 Piedmont Road, NE, Suite 2500

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Allison.McGregor@gtlaw.com

Proposed Counsel for the Debtors and Debtors in Possession

Exhibit 1

Proof of Claim Form

Exhibit 2

Bar Date Notice

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

**NOTICE OF DEADLINES FOR THE FILING OF (I) PROOFS OF CLAIM,
AND (II) REJECTION DAMAGES CLAIMS**

The chapter 11 bankruptcy cases (the “Chapter 11 Cases”) concerning the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) were filed on August 4, 2025 (the “Petition Date”). You may be a creditor of the Debtors.

On September [●], 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Bankruptcy Court”) entered an order (the “Bar Date Order”)² in the Chapter 11 Cases establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim (“Proofs of Claim”), and claims for damages stemming from rejection of executory contracts or unexpired leases. For your convenience, enclosed with this notice (this “Notice”) is a Proof of Claim form.

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, and governmental units. The terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “claim” means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any 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) any 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.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Bar Date Order.

A. The Bar Dates

The Bar Date Order establishes the following bar dates for filing Proofs of Claim in these Chapter 11 cases (the “Bar Dates”):

- (a) The Claims Bar Date. Pursuant to the Bar Date Order, except as described below, all entities holding claims against any Debtor that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date, **are required to file Proofs of Claim so that such Proofs of Claim are received by the Claims and Noticing Agent by the Claims Bar Date (i.e., on or before October 20, 2025, at 5:00 p.m., prevailing Eastern Time).** The Claims Bar Date applies to all types of claims against any Debtor that arose prior to the Petition Date, including, without limitation, secured claims, unsecured priority claims, and unsecured non-priority claims, and claims arising under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days before the Petition Date.
- (b) The Governmental Bar Date. All governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date **are required to file proofs of claim so that such Proofs of Claim are received by the Claims and Noticing Agent by March 9, 2026, at 5:00 p.m., prevailing Eastern Time** (the “Governmental Bar Date”). The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including, without limitation, governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.
- (c) The Amended Schedules Bar Date. Pursuant to the Bar Date Order, all parties asserting claims against the Debtors’ estates that are affected by a previously unfiled Schedule or amendment or supplement to the Schedules **are required to file Proofs of Claim so that such Proofs of Claim are received by the Claims and Noticing Agent by the Amended Schedules Bar Date (i.e., by the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable depending on the claimant, or (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days from the date on which the Debtors provide notice of such filing, amendment or supplement).**
- (d) The Rejection Damages Bar Date. Pursuant to the Bar Date Order, all parties asserting claims against the Debtors’ estates arising from the Debtors’ rejection of an executory contract or unexpired lease **are required to file Proofs of Claim with respect to such rejection so that such Proofs of Claim are received by the Claims and Noticing Agent by the Rejection Damages Bar Date (i.e., by the later of (a)**

the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) the date set by the Court in an order approving such rejection).

B. Who Must File a Proof of Claim

Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose (or that are deemed to have arisen) prior to the Petition Date *must* file Proofs of Claim on or before the applicable Bar Date:

- (a) any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules or is listed as "contingent," "unliquidated," or "disputed" and if such entity desires to participate in any of these chapter 11 cases or share in any distribution in any of these 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 that any claim 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 different Debtor;
- (d) any entity that believes that its claim asserts administrative priority and arising in the ordinary course of business (but not, for the avoidance of doubt, claims asserting priority pursuant to 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 a Debtor and has not previously filed any such claim; and
- (f) any person or entity who asserts a claim arising from or related to pending or threatened litigation against a Debtor.

C. Parties Who Do Not Need to File Proofs of Claim

Certain parties are not required to file Proofs of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates shall not be required to file Proofs of Claims:

- (a) any entity that already has filed a signed Proof of Claim against the respective Debtor(s) with the Clerk of the Court or with the Claims and Noticing Agent in a form substantially similar to Official Form 410;
- (b) any entity whose claim is listed on the Schedules if: (i) the claim is not scheduled as "disputed," "contingent," or "unliquidated;" (ii) such entity agrees with the amount, nature,

and priority of the claim as set forth in the Schedules; and (iii) such entity does not dispute that its claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;

- (c) the DIP Lender and the Prepetition Lender;
- (d) any entity whose claim previously has been allowed by order of the Court;
- (e) any entity whose claim has been paid in full by the Debtors in accordance with an order of the Court;
- (f) any Debtor or non-Debtor subsidiary having a claim against another Debtor;
- (g) any entity whose claim is solely against any of the Debtors' non-Debtor affiliates;
- (h) any holder of an equity interest in a Debtor need not file a proof of interest with respect to the ownership of such equity interest at this time; provided, however, that any holder of an equity interest who wishes to assert a claim against a Debtor, including a claim relating to such equity interest or the purchase or sale of such interest, must file a proof of claim asserting such claim on or prior to the Claims Bar Date pursuant to procedures set forth herein;
- (i) an employee of any Debtor holding a claim for wages, commissions, or benefits if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business; provided, however, that a current or former employee must submit a Proof of Claim by the Claims Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and/or retaliation, as applicable;
- (j) any entity holding a claim for which a separate deadline is fixed by the Court;
- (k) any entity that is exempt from filing a Proof of Claim by order of the Court; and
- (l) administrative expense claims for post-petition fees and expenses incurred by any professional allowable under sections 330, 331, and 503(b) of the Bankruptcy Code.

Persons or entities who have already filed proofs of claim that comply with the procedures set forth in this Notice prior to service of this Notice shall not be required to refile such Proofs of Claim.

D. Instructions for Filing Proof of Claim

The following requirements shall apply with respect to filing and preparing each Proof of Claim against the first-listed Debtor.

- (a) Contents. Each Proof of Claim must: (i) be legible and written in English; (ii) include a claim amount denominated in United States dollars (using the Petition Date rate of conversion, if applicable); (iii) conform substantially with the Proof of Claim Form or Official Form 410; and (iv) be signed under penalty of perjury by the claimant or by an authorized agent or legal representative of the claimant.
- (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. Copies of Proofs of Claim or Proofs of Claim sent by facsimile or electronic mail will not be accepted.
- (c) Identification of the Debtor Entity. Each Proof of Claim must clearly identify the Debtor against which the claim is being asserted, including such Debtor's individual case number. A Proof of Claim filed under the joint administration case number (No. 25-58764) or otherwise without identifying a specific Debtor, will be deemed filed only against Debtor Wellmade Floor Coverings International, Inc.
- (d) Claim Against Multiple Debtors. Each Proof of Claim must state a claim against only one Debtor. If a creditor has a claim against multiple Debtors, it must file a separate Proof of Claim against each such Debtor. If more than one Debtor is listed on a single Proof of Claim, the asserted claim will be deemed filed only against the first-listed Debtor. If the claimant asserts a claim against more than one Debtor or has claims against different Debtors, a separate Proof of Claim must be filed with respect to each Debtor.
- (e) Supporting Documentation. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d).
- (f) Timely Filing. Each Proof of Claim (including supporting documentation) must be filed so as to be received, on or before the applicable Bar Date by either: (i) electronically using the interface available on the Notice and Claims Agent's website at <https://veritaglobal.net/wellmade>; or (ii) first-class U.S. Mail, overnight mail, or other hand-delivery system, which Proof of Claim must include an original signature, at the following address:

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

Proofs of claim submitted by facsimile or electronic mail will not be accepted and will not be deemed timely FILED.

- (g) Receipt of Service. Claimants wishing to receive acknowledgment that their Proofs of Claim were timely received by the Claims and Noticing Agent 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.

E. Consequences of Failing to Timely File Your Proof of Claim

Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), if you are required, but fail, to file a Proof of Claim in accordance with the Bar Date Order on or before the applicable Bar Date, please be advised that:

- (a) YOU WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST ANY OF THE DEBTORS (OR FILING A PROOF OF CLAIM WITH RESPECT THERETO IN THESE CHAPTER 11 CASES);
- (b) THE DEBTORS AND THEIR PROPERTY SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO OR ARISING FROM SUCH CLAIM;
- (c) YOU WILL NOT RECEIVE ANY DISTRIBUTION IN THESE CHAPTER 11 CASES ON ACCOUNT OF THAT CLAIM; AND
- (d) YOU WILL NOT BE PERMITTED TO VOTE ON ANY CHAPTER 11 PLAN FOR THE DEBTORS ON ACCOUNT OF THAT CLAIM OR RECEIVE FURTHER NOTICES REGARDING SUCH CLAIM.

F. Amendment to the Debtors' Schedules

If, subsequent to the date of this Notice, the Debtors file a previously unfiled Schedule or amend or supplement their Schedules to reduce the amount of your claim previously listed in the Schedules as undisputed, noncontingent, and liquidated, or to change the nature or classification of your claim reflected in the Schedules, you are required to file a Proof of Claim or amend any previously filed Proof of Claim in respect of the additional or amended scheduled claim on or before the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable to such claim, or (b) 5:00 p.m. prevailing Eastern Time on the date that is thirty (30) days after the date that on which the Debtors provide notice of the filing, amendment, or supplement to the Schedules (or another time period as may be fixed by the Court) (the "Amended Schedules Bar Date").

G. The Rejection Damages Bar Date

If you have a claim arising from the rejection of an executory contract or unexpired lease, you must submit your Proof of Claim based on such rejection on or before the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) the date set by the Court in an order approving such rejection (the "Rejection Damages Bar Date"). The Debtors will provide notice of the Rejection Damages Bar Date to the contract or lease counterparty whose contract or lease is being rejected at the time the Debtors reject such executory contract or unexpired lease.

H. The Debtors' Schedules and Access Thereto

You may be listed as the holder of a claim against one or more of the Debtors on the Debtors' Schedules. It is your responsibility to determine that your claim is accurately listed in the Schedules.

If you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules, and if you do not dispute that your claim is only against the Debtor specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice.

I. Additional Information

Copies of the Debtors' Schedules, the Bar Date Order, and other information regarding these chapter 11 cases are available for inspection free of charge on the Claims and Noticing Agent's website at <https://veritaglobal.net/wellmade>. The Schedules and other filings in these chapter 11 cases also are available for a fee at the Court's website at <https://ecf.ganb.uscourts.gov/>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>.

If you require additional information regarding the filing of a proof of claim, you may contact the Claims and Noticing Agent directly by writing to: Wellmade Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy, Suite 300, El Segundo, CA 90245. **Please note** that the Claims and Noticing Agent **cannot** offer legal advice or advise whether you should 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 THE DEBTORS BUT MAY NOT HAVE AN UNPAID CLAIM AGAINST THE DEBTORS. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THIS COURT BELIEVE THAT YOU HAVE ANY CLAIM. A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTORS SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE, SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM.

Reservation of Rights

Nothing contained in this Notice is intended or should be construed as, as waiver of the rights of the Debtors or any party in interest to: (a) dispute, or assert offsets or defenses against, any claim asserted by a Proof of Claim or listed on the Schedules, (b) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and otherwise amend or supplement the Schedules.

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Dated: September 4, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod (Ga. Bar. No. 246604)

Allison J. McGregor (Ga. Bar. No. 860865)

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Allison.McGregor@gtlaw.com

*Proposed Counsel for the Debtors and
Debtors in Possession*

Exhibit 3

Publication Notice

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

WELLMADE FLOOR COVERINGS
INTERNATIONAL, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-58764

(Jointly Administered)

NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM

The chapter 11 bankruptcy cases (the “Chapter 11 Cases”) concerning the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) were filed on August 4, 2025 (the “Petition Date”). You may be a creditor of the Debtors.

On September [●], 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Bankruptcy Court”) entered an order (the “Bar Date Order”)² in the Chapter 11 Cases establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim (“Proofs of Claim”), including Rejection Damages Claims.

The Bar Dates

The Claims Bar Date. Pursuant to the Bar Date Order, unless otherwise provided in this Notice, all entities, including individuals, partnerships, estates, and trusts who have a claim or potential claim against the Debtors, including, without limitation, any secured claim, unsecured claim, priority claim or claim asserted under section 503(b)(9) of the Bankruptcy Code for goods delivered and received by any of the Debtors within twenty (20) days before the Petition Date, that arose prior to the Petition Date, no matter how remote or contingent such right to payment or equitable remedy may be, MUST FILE A PROOF OF CLAIM on or before **October 20, 2025, at 5:00 p.m., prevailing Eastern Time** (the “Claims Bar Date”).

The Governmental Bar Date. Governmental entities who have a claim or potential claim against the Debtors that arose prior to the Petition Date, no matter how remote or contingent such right to payment or equitable remedy may be, MUST FILE A PROOF OF CLAIM on or before **March 9, 2026, at 5:00 p.m., prevailing Eastern Time** (the “Governmental Bar Date”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Wellmade Industries MFR. N.A LLC (1058) and Wellmade Floor Coverings International, Inc. (8425). The mailing address for the Debtors for purposes of these chapter 11 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Bar Date Order.

The Amended Schedules Bar Date. All parties asserting claims against the Debtors' estates that are affected by a previously unfiled Schedule or amendment or supplement to the Schedules are required to file Proofs of Claim **by the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) 5:00 p.m., prevailing Eastern Time, on the date that is thirty (30) days from the date on which the Debtors provide notice of a previously unfiled Schedules or amendment or supplement to the Schedules** (the "Amended Schedules Bar Date").

The Rejection Damages Bar Date. All parties asserting claims against the Debtors' estates arising from the Debtors' rejection of an executory contract or unexpired lease must file a Proof of Claim **by the later of (a) the Claims Bar Date or the Governmental Bar Date, as applicable, or (b) the date set by the Court in an order approving such rejection** (the "Rejection Damages Bar Date").

ANY PERSON OR ENTITY WHO FAILS TO FILE A PROOF OF CLAIM OR WHO FAILS TO FILE AN ADMINISTRATIVE CLAIM WITH THE COURT, IN EACH CASE ON OR BEFORE THE APPLICABLE BAR DATE, SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF VOTING AND DISTRIBUTION ON ANY CHAPTER 11 PLAN.

Filing a Proof of Claim. Each Proof of Claim must be filed, including supporting documentation, by (i) electronically using the interface available on the Notice and Claims Agent's website at <https://veritaglobal.net/wellmade>; or (ii) first-class U.S. Mail, overnight mail, or other hand-delivery system, which Proof of Claim must include an original signature, so as to be received by Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "**Claims and Noticing Agent**") on or before the Claims Bar Date or the Governmental Bar Date (or, where applicable, on or before any other Bar Date as set forth herein) at the following address:

Wellmade Claims Processing Center
c/o KCC dba Verita
222 N. Pacific Coast Hwy, Suite 300
El Segundo, CA 90245
T: (888) 647-1744

Contents of Proofs of Claim. Each proof of claim must (i) be legible and written in English; (ii) include a claim amount denominated in United States dollars (using the Petition Date rate of conversion, if applicable); (iii) conform substantially with the Proof of Claim Form; (iv) be signed under penalty of perjury by the claimant or by an authorized agent or legal representative of the claimant; and (v) include as attachments any and all supporting documentation on which the claim is based. ***Please note*** that each proof of claim must state a claim against only one Debtor and clearly indicate the specific Debtor against which the claim is asserted. To the extent more than one Debtor is listed on the proof of claim, a proof of claim is treated as if filed only against the first-listed Debtor, or if a proof of claim is otherwise filed without identifying a specific Debtor, the proof of claim may be deemed as filed only against Wellmade Floor Coverings International, Inc.

Additional Information. If you have any questions regarding the claims process and/or you wish to obtain a copy of the Bar Date Notice, a Proof of Claim Form or related documents you may do so by: (i) visiting the Debtors' restructuring website at: <https://veritaglobal.net/wellmade>; and/or (ii) Wellmade Claims Processing Center, c/o KCC dba Verita, 222 N. Pacific Coast Hwy, Suite 300, El Segundo, CA 90245. ***Please note*** that the Claims and Noticing Agent cannot offer legal advice or advise whether you should file a proof of claim.

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Dated: September 4, 2025

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod (Ga. Bar. No. 246604)

Allison J. McGregor (Ga. Bar. No. 860865)

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*Proposed Counsel for the Debtors and
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