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-sms

(Jointly Administered)

APPLICATION OF THE COMMITTEE OF CREDITORS HOLDING UNSECURED CLAIMS FOR AUTHORIZATION TO RETAIN AND EMPLOY DUNDON ADVISERS, LLC AS FINANCIAL ADVISOR EFFECTIVE AS OF AUGUST 19, 2025

The Committee of Creditors Holding Unsecured Claims (the "Committee") of Wellmade Floor Covering International, Inc. and its affiliated debtors and debtors in possession (collectively, the "Debtors") hereby submits its application (the "Application") for the entry of an order, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "Bankruptcy Code"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), authorizing and approving the employment of Dundon Advisers, LLC ("Dundon" or the "Firm") as financial advisor to the Committee in connection with the Debtors' jointly-administered chapter 11 cases (the "Chapter 11 Cases"), effective as of August 19, 2025. In support of the Application, the Committee respectfully represents as follows:

JURISDICTION AND VENUE

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

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.



proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of these Chapter 11 Cases and this Application 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 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases* (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. The Debtors are operating their business and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors' chapter 11 cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases.
- 4. On August 14, 2025, the Office of the United States Trustee (the "<u>U.S. Trustee</u>") appointed the Committee pursuant to section 1102 of the Bankruptcy Code. *See* Docket No. 111. The Committee, as reconstituted from time to time, is comprised of the following two members: (1) Flooring Investments, LLC; and (2) Yu Cong Liu.²
- 5. On August 19, 2025, the Committee held a meeting and, among other things, voted to retain Dundon as its financial advisor, subject to this Court's approval.

RELIEF REQUESTED

6. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form of the Proposed Order, authorizing the Committee to employ and

² The Sherwin-Williams Company, which was appointed to the Committee as a member, has subsequently resigned from the Committee after receipt of payment in full of its prepetition claim as a critical vendor.

retain the Firm as its financial advisor in these Chapter 11 Cases attached hereto as **Exhibit A** (the "Proposed Retention Order").

7. The Committee has selected Dundon as its financial advisor in furtherance of the efficient administration of the estates on behalf of the Committee. The Committee seeks to retain the Firm effective as of August 19, 2025, because the Firm began providing services to the Committee as of such date.

DUNDON'S QUALIFICATIONS AND SERVICES TO BE RENDERED

8. Dundon Advisers is a financial advisory firm whose professionals' experience with distressed assets and the bankruptcy process goes back to the 1990s. The Committee has selected Dundon because Dundon's professionals have extensive experience in providing financial advisory services in restructuring and reorganizations, having rendered these services to debtors and creditors throughout the United States. Dundon Advisers presently acts or recently acted as financial adviser to: Official Committees of Unsecured Creditors of 1 Global (SD FL), Aerofarms, Inc. (Delaware), Agera Energy (SDNY), Aequor Management (ED TX), AfterShock Comics (CD CA), Alamo Drafthouse (Delaware), All American Oil and Gas (WD TX), Alpha Entertainment (Delaware), Alpha Media (ED VA), American Virtual Cloud Technologies (Delaware), Aralez Pharmaceuticals (SDNY), Aztec Shaeffer (WD TX), BeavEx (Delaware), Better Nutritionals (CD CA), Big Village (Delaware), Celadon (Delaware), Comcar (Delaware), DCA Outdoor, Inc. (WD MO), Easterday Farms (ED WA), Endo Pharmaceuticals (SDNY), Franks Theatres (New Jersey), Front Sight Management (Nevada), Fuse Media (Delaware), Glostation USA (CD CA), Gold's Gym (ND TX), Goodrich Quality Theaters (WD MI), Ho Wan Kwok (Connecticut), Impresa Aerospace (Delaware), In-Shape (Delaware), iPic (Delaware), Jagged Peak/Trade Global (Nevada), Juno USA (Delaware), K&W Cafeterias (MD NC), LaSalle Group (ND TX), LBI Media (Delaware), Loot Crate (Delaware), Lucira Health (Delaware), Madison Square Boys & Girls Clubs (SDNY), Maines Paper & Food (Delaware), Mallinckrodt (Delaware), Matheson (ED CA), McClatchy (SDNY), Miles Keller Trucking (CD IL), NewAge (Delaware), NG Purvis Farms (ED VA), Nova Shurline Wildcat (Delaware), Omega Therapeutics (Delaware); Open Road Films (Delaware), Packable (DE), Pipeline Foods (Delaware), Platinum Corral (ED NC), Professional Technical Security Services (ND CA), Proteus Heath (Delaware), Quanergy (NJ), Remnant Oil Company (WD Texas), Rive Gauche Television (CD CA), Rocking M Media (Kansas), SIW Holdings (Delaware), Slidebelts (ED CA), South American Beef (SD IA), Studio Movie Grill (ND TX), Sunergy (ED CA), Sungard Availability Services (SD TX), TOMS King (ND OH), TPC Group (Delaware), Trinitas Farming LLC (NDCA), Valmiera Glass (ND GA), Vector Launch (Delaware), Video Corporation of America (D NJ), Volunteer Energy (SD OH), Wave Technologies (ND CA), Wellpath Holdings, Inc. (DS TX), Whittier Seafoods (Anchorage), YogaWorks (ND TX), and YouFit (Delaware), and the Ad Hoc Noteholder Group in the Woodbridge Group of Companies (Delaware), the Ad Hoc Group of Consumer and Worker Litigation Claimants in Hertz (Delaware), the Committee of Customers in Lear Capital (Delaware), the Official Committee of Tort Claimants in PG&E (ND CA), the Ad Hoc Group of Individual Victims in Purdue (SDNY), the Ad Hoc Group of Second Lien Bondholders in CalPlant (Delaware), the Official Committee of Unsecured Commercial Creditors of the Roman Catholic Archdiocese of New Orleans (ED LA), the Ad Hoc Group of Equity Security Holders in RAIT (Delaware), and the Ad Hoc Group of Equity Interest Holders in Voyager (SDNY). All of the foregoing are highly complex chapter 11 cases.

9. Dundon Advisers provides direct services to debtors, individual creditors, and potential asset acquirors in many in-court and out-of-court restructuring proceedings; Dundon

Advisers' individual creditor clients have been appointed to scores of official committees of unsecured creditors in many districts since April 2016, and Dundon Advisers has taken an active role in the activities of many of those committees. Dundon Advisers regularly advises litigation trustees, liquidating trustees, and plan administrators appointed as part of the resolution of chapter 11 cases, and its senior employees regularly act as liquidating trustees, litigation trustees, plan administrators; members of advisory and supervisory bodies for such trustees and administrators; and independent directors or managers of corporations and companies presently or recently in financial distress. Dundon Advisers also provides financial advisory and investment management services in many non-bankruptcy contexts.

- 10. Leadership in this Chapter 11 Case for Dundon Advisers will be provided by Joshua Nahas and Eric Reubel, both Managing Directors of the firm. The Committee's selection of Dundon Advisers as a financial advisor was based upon, among other things: (a) the Committee's need to retain a financial advisory firm to provide advice relevant to the scope of the Committee's mandate, (b) Dundon Advisers' senior professionals' extensive experience and excellent reputation in providing financial advisory services in chapter 11 cases such as this Chapter 11 Case, and (c) the experience of Mr. Nahas and Mr. Reubel in prior cases involving flooring.
- 11. The Committee determined that Dundon Advisers brought a unique blend of case-specific knowledge, relevant experience, and expertise. The Committee believes that Dundon Advisers' proposed compensation structure is competitive, appropriate and reasonable in the context of these Chapter 11 Case.
- 12. The Committee submits that it is necessary and appropriate for it to employ and retain the Firm to provide, among other things, the following services as may be requested by the Committee and its other professionals:

- Assist in the analysis, review, and monitoring of the restructuring and/or liquidation process, including, but not limited to, an assessment of the unsecured claims pool and potential recoveries for unsecured creditors;
- Develop a complete understanding of the Debtors' businesses and their valuations;
- Determine whether there are viable alternative paths for the disposition of the Debtors' assets any currently or in the future proposed by the Debtors;
- Monitor and, to the extent appropriate, assist the Debtors in efforts to develop and solicit transactions which would support unsecured creditor recovery;
- Assist the Committee in identifying, valuing and pursuing estate causes of action, including, but not limited to, relating to prepetition transactions, control person liability and lender liability;
- Assist the Committee to analyze, classify and address claims against the Debtors and to participate effectively in any effort in this Chapter 11 Case to estimate (in any formal or informal sense) contingent, unliquidated and disputed claims;
- Assist the Committee to identify, preserve, value and monetize tax assets of the Debtors, if any;
- Advise the Committee in negotiations with the Debtors, certain of the Debtors' lenders and third parties;
- Assist the Committee in reviewing the Debtors' financial reports, including, but not limited to, statements of financial affairs, schedules of assets and liabilities, cash budgets and monthly operating reports;
- Assist the Committee in reviewing the Debtors' cost/benefit analysis with respect to the assumption or rejection of various executory contracts and leases;
- Review and provide analysis of the present and any subsequent proposed debtorin-possession financing or use of cash collateral;
- Assist the Committee in evaluating and analyzing avoidance actions, including fraudulent conveyances and preferential transfers;
- Review and provide analysis of any proposed disclosure statement and chapter 11 plan and, if appropriate, assist the Committee in developing an alternative chapter 11 plan;
- Attend meetings and assist in discussions with the Committee, the Debtors, the secured lenders, the U.S. Trustee and other parties in interest and professionals;

- Present at meetings of the Committee, as well as meetings with other key stakeholders and parties;
- Perform such other advisory services for the Committee as may be necessary or proper in these proceedings, subject to the aforementioned scope; and
- Provide testimony on behalf of the Committee as and when may be deemed appropriate.
- 13. Dundon will coordinate closely with co-counsel Pachulski Stang Ziehl & Jones LLP, and Small Herrin, LLP, to minimize the duplication of the services provided to the Committee by each professional and meet the scope of services each firm is retained to provide.

NO ADVERSE INTEREST AND DISCLOSURES REGARDING CONNECTIONS

- 14. The Committee believes that Dundon does not hold or represent any interest that is adverse to the Committee and the Debtors' estates and does not hold or represent any interest adverse to and has no connection with the Committee, the Debtors, the Debtors' creditors, or any party in interest herein in the matters upon which Dundon is to be retained.
- 15. To the best of the Committee's knowledge, neither the Firm nor any of its partners, associates or staff members have any connection with any party in interest or their attorneys or accountants, other than as set forth in the attached verified statement (the "Verified Statement").
- 16. To the best of the Committee's knowledge, other than as set forth above, neither the Firm, nor any of its partners, associates or staff members represent any interest adverse to that of the Committee in the matters on which they are to be retained.
- 17. The Committee submits that its proposed employment of Dundon is in the best interests of the Committee and its members.
- 18. While the Firm has undertaken, and continues to undertake, efforts to identify connections with the Debtors and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should the Firm, through its continuing efforts or

as these Chapter 11 Cases progress, learn of any new connections of the nature described above, the Firm will promptly file supplemental declarations as required by Bankruptcy Rule 2014(a).

- 19. The Firm represents many debtors and creditors' committees in other bankruptcy cases, and those debtors, the members of those committees, or those estates may be creditors of the Debtors. However, the Firm will not represent any of those debtors, creditors' committees, or committee members with respect to any claims that they may have collectively or individually against the Debtors.
- 20. Similarly, Dundon may represent, or may have represented, debtors, creditors' committees, or trustees in cases or proceedings against creditors of the Debtors that are unrelated to these Chapter 11 Cases.

PROFESSIONAL COMPENSATION

21. Subject to Court approval and in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to Dundon on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Dundon. Through and including June 30, 2026, Dundon Advisers' professionals bill according to the following rate structure:

Rank	Case Rate
Principal	\$1,090
Managing Director	
and Senior Adviser	\$960
Senior Director	\$850
Director	\$755
Associate Director	\$650
Senior Associate	\$495
Associate	\$350

- 22. Dundon Advisers' rate schedule is customarily revised each twelve months, with the next such revision scheduled to take effect July 1, 2026. Non-working travel time, if any, is billed at 50% of otherwise-applicable rates. Dundon will provide notice of any further hourly rate increases in accordance with the terms of the Proposed Order.
- 23. In addition, Dundon will bill for all out-of-pocket expenses reasonably and actually incurred by Dundon in connection with the matters contemplated by this Application.
- 24. Dundon Advisers will be reimbursed for its reasonable and necessary out-of-pocket expenses (which shall be charged at cost) incurred in connection with this engagement, such as travel, lodging, duplicating, research, messenger and telephone charges. Dundon Advisers will charge for these expenses at rates consistent with or discounted to charges made to other Dundon Advisers clients and subject to the guidelines of the U.S. Trustee.
- 25. Dundon Advisers will maintain detailed records of fees and expenses incurred in connection with the rendering of the financial advisory services described above, in accordance with applicable rules and guidelines.
- 26. In light of the foregoing, the Committee believes that Dundon Advisers' fee structure is reasonable, market-based and designed to fairly compensate Dundon Advisers for its work in this Chapter 11 Case.

STATEMENT REGARDING U.S. TRUSTEE GUIDELINES

27. In accordance with the U.S. Trustee Guidelines, Dundon Advisers shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Case in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the terms of any order establishing procedures for interim compensation that may be entered in this case. Dundon Advisers also intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional

disclosures as set forth in the U.S. Trustee Guidelines, both in connection with this Application and the interim and final applications to be filed by Dundon Advisers in this Chapter 11 Case.

NOTICE

28. Notice of this Application will be provided to (i) the Debtors and their counsel, (ii) the U.S. Trustee, (iii) the Debtors' prepetition and postpetition lenders, (iv) those persons who have formally appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002, and (v) the members of the Committee. In light of the nature of the requested relief, the Committee submits that such notice is sufficient and that no other or further notice is needed.

NO PRIOR REQUEST

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

WHEREFORE, the Committee respectfully requests the entry of an order, substantially in the form of the Proposed Order, authorizing the Committee to employ and retain Dundon as financial advisor effective as of August 19, 2025 and granting such other and further relief as is just and proper.

Dated: September 5, 2025

COMMITTEE OF CREDITORS
HOLDING UNSECURED CLAIMS
OF DEBTORS WELLMADE
FLOOR COVERINGS
INTERNATIONAL, INC., ET AL

By: /s/ Aaron Halegua
Aaron Halegua, Esq.
On behalf of Committee Member
Yu Cong Liu solely in his capacity
as Authorized Representative of the
Committee of Creditors Holding
Unsecured Claims of Wellmade
Floor Coverings International, Inc.,
et al, and not in any other capacity

VERIFICATION

Pursuant to 28 U.S.C. § 1746, the undersigned does hereby declare under the penalty of perjury, under the laws of the United States of America, that the statements contained in the foregoing Application are true and correct.

Executed this 5th day of August, 2025.

Committee of Creditors Holding Unsecured Claims of Debtors Wellmade Floor Coverings International, Inc., et al,

By: /s/ Aaron Halegua

Aaron Halegua, Esq.
On behalf of Committee Member Yu
Cong Liu solely in his capacity as
Authorized Representative of the
Committee of Creditors Holding
Unsecured Claims of Wellmade Floor
Coverings International, Inc., et al, and
not in any other capacity

VERIFIED STATEMENT

The undersigned makes the following solemn oath:

- 1. I am a Managing Director with Dundon, LLC ("<u>Dundon</u>"), which is a financial advisory firm with its principal office located at 10 Bank Street, Suite 1100, White Plains, New York 10606. Dundon also has offices in the West Palm Beach metro area.
- 2. I am authorized to submit this Verified Statement on behalf of Dundon in support of the Application.
- 3. To the best of my knowledge, neither Dundon nor its partners, associates or staff members, for the two years prior to the date of this Verified Statement, were or are currently directors, officers, equity security holders, partners, general partners, managers, members, creditors, persons or entities in control of Debtors or any entity owned by Debtors, or related to a general partner, director, officer, or person in control of an entity owned by Debtors.
- 4. Additionally, to the best of my knowledge, neither Dundon nor its partners, associates or staff members have any connection with Debtors, its creditors, any other party in interest, their respective attorneys or accountants, or the United States Trustee, or any person employed in the Office of the United States Trustee, or hold or represent any interest that are adverse to the Estate, except as disclosed below, none of which is believed to negatively impact Dundon's disinterestedness:
 - Dundon Advisers or certain of its personnel, not in their respective individual capacities,
 but solely acting as trustee or other fiduciary for certain trusts or other objects of its, his or
 her fiduciary duty, engaged or have engaged Verita as a claims and noticing agent in
 restructuring matters unrelated to these Chapter 11 Cases.

Dundon Advisers receives payment card services from JP Morgan in the ordinary course

of their respective businesses.

• Dundon Advisers receives courier services from UPS in the ordinary course of their

respective businesses.

• Dundon Advisers receives courier and printing services from FedEx in the ordinary course

of their respective businesses.

• Dundon Advisers was financial adviser to the State of North Carolina in a completed

matter unrelated to these Chapter 11 Cases.

• Dundon Advisers receives office and pantry supply services from Costco in the ordinary

course of their respective businesses.

Pursuant to 28 U.S.C. § 1746, I do hereby declare under the penalty of perjury, under the

laws of the United States of America, that the statements contained in this foregoing Verified

Statement are true and correct.

Executed this 26th day of August 2025.

/s/ Eric Reubel

Eric Reubel

Exhibit A

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

	Related to Docket No.
Debtors.	(Jointly Administered)
INTERNATIONAL, INC., et al., ¹	Case No. 25-58764-sms
In re:	Chapter 11

ORDER APPROVING APPLICATION OF THE COMMITTEE OF CREDITORS HOLDING UNSECURED CLAIMS FOR AUTHORIZATION TO RETAIN AND EMPLOY DUNDON ADVISERS, LLC AS FINANCIAL ADVISOR EFFECTIVE AS OF AUGUST 19, 2025, SUBJECT TO OBJECTION

The Committee of Creditors Holding Unsecured Claims of the Debtors (the "<u>Committee</u>") filed on September 5, 2025 (Docket No. ____) an *Application of the Committee of Creditors Holding Unsecured Claims for Authorization to Retain And Employ Dundon, LLC as Financial Advisor Effective as of August 19, 2025* (the "<u>Applicant</u>") as financial advisor for the Committee in these Chapter 11 Cases (the "<u>Application</u>")². No hearing is necessary on the Application

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 A capitalized term used but not defined herein shall have the meaning ascribed to it in the Application.

absent the filing of an objection to it. Pursuant to a certificate of service filed with or attached to the Application, the Application has been served on the United States Trustee as required by Federal Rule of Bankruptcy Procedure 2014, and on lenders with an interest in all or substantially all of the Debtors' assets, any party that has filed a notice of appearance or request for notices in this case as of the date of the filing of the Application, and the thirty (30) largest unsecured creditors on the list filed by the Debtors pursuant to Federal Rule of Bankruptcy Procedure 1007(d). No further service of the Application is necessary.

The Application and accompanying affidavit of Eric Reubel demonstrate preliminarily that the Applicant are disinterested professionals. Accordingly, it is hereby

ORDERED that, pursuant to 11 U.S.C. §§ 328(a), 1103(a), and Federal Rule of Bankruptcy Procedure 2014, the Application is **GRANTED**, and the Committee is authorized to employ the Applicant as its financial advisor during the Debtors' Chapter 11 Cases, subject to objection as provided for herein; and it is further

ORDERED that compensation may be paid and expenses reimbursed to the Applicant only pursuant to an application filed and approved by this Court pursuant to 11 U.S.C. §§ 330, 331 and Federal Rule of Bankruptcy Procedure 2016, unless the Court orders otherwise; and it is further

ORDERED that any party in interest shall have twenty-one (21) days from the service of this Order to file an objection to the Application and/or the relief provided in this Order; and it is further

ORDERED that if an objection is timely filed counsel for the Committee will set the Application and all such objections for hearing pursuant to the Court's Open Calendar Procedures; and it is further

ORDERED that if no objection to this Order is timely filed, this Order shall be a final Order approving the Application; and it is further

ORDERED that counsel for the Committee shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by first class mail, postage prepaid,³ on all parties served with the Application, and shall file promptly thereafter a certificate of service confirming such service.

[END OF DOCUMENT]

Prepared and presented by:

PACHULSKI STANG ZIEHL & JONES, LLP

Proposed Lead Counsel for the Committee of Creditors Holding Unsecured Claims

By: /s/ Anna M. Humnicky

Signed w/express permission by Anna M. Humnicky Bradford J. Sandler (N.Y. Bar No. 4499877)* Shirley S. Cho, Esq. (CA Bar No. 192616)* Maxim B. Litvak, Esq. (CA Bar No. 215852)* Cia H. Mackle, Esq. (FL Bar No. 0026471)* Theodore S. Heckel, Esq. (TX Bar no. 24133488)* *Admitted Pro Hac Vice

1700 Broadway, 36th Floor New York, NY, 10019

Email: bsandler@pszjlaw.com;

scho@pszjlaw.com; mlitvak@pszjlaw.com; cmackle@pszjlaw.com theckel@pszjlaw.com

(SIGNATURES CONTINUED ON NEXT PAGE)

First class mail service is not required if the recipient is a registered ECF user who has agreed to waive all other service in favor of ECF service pursuant to Bankruptcy Local Rule 5005-8, in which case ECF notification shall serve as the required service. The party certifying service should certify ECF service on such recipients.

SMALL HERRIN, LLP

Proposed Local Counsel for the Committee of Creditors Holding Unsecured Claims

By: /s/ Anna M. Humnicky
Gus H. Small
GA Bar No. 653200
Anna M. Humnicky
GA Bar No. 377850

Andy T. Nguyen GA Bar No. 729256

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Eric A. Reubel, Managing Director Dundon Advisers, LLC 10 Bank Street, Suite 1100 White Plains, NY 10606

John D. Elrod, Esq. Allison Jane McGregor, Esq. Greenberg Traurig, LLP 3333 Piedmont Road, N.E. Terminus 200, Suite 2500 Atlanta, Georgia 30305

Lindsay P.S. Kolba Office of the United States Trustee 362 Richard Russell Building 75 Ted Turner Drive, SW Atlanta, Georgia 30303

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

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

Debtors.

Chapter 11

Case No. 25-58764-sms

(Jointly Administered)

CERTIFICATE OF SERVICE

I, Anna M. Humnicky, certify that I am over the age of 18 and that on September 5, 2025, I filed and served copies of the APPLICATION OF THE COMMITTEE OF CREDITORS HOLDING UNSECURED CLAIMS FOR AUTHORIZATION TO RETAIN AND EMPLOY DUNDON ADVISERS, LLC AS FINANCIAL ADVISOR EFFECTIVE AS OF AUGUST 19, 2025 on behalf of the Committee, by using the Bankruptcy Court's Electronic Case Filing program which sends a notice of the above-listed document and an accompanying link to the document to the parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program, as indicated in Exhibit "A."

This 5th day of September 2025.

By: /s/ Anna M. Humnicky
Anna M. Humnicky
GA Bar No. 377850

Small Herrin, LLP 100 Galleria Parkway Suite 350 Atlanta, GA 30339 (P): (770) 857-4770

ahumnicky@smallherrin.com

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.

EXHIBIT A

Shawn M. Christianson on behalf of Creditor Oracle America, Inc. schristianson@buchalter.com, cmcintire@buchalter.com

Christopher K. Coleman on behalf of Creditor AHF IC, LLC christopher.coleman@kslaw.com

John D. Elrod on behalf of Debtor Wellmade Floor Coverings International, Inc. elrodj@gtlaw.com, fieldss@gtlaw.com, fieldss@gtlaw.com)

John D. Elrod on behalf of Debtor Wellmade Industries MFR. N.A LLC elrodj@gtlaw.com, fieldss@gtlaw.com,allison.mcgregor@gtlaw.com

John D. Elrod on behalf of JointAdmin Debtor Wellmade Industries MFR. N.A LLC <u>elrodj@gtlaw.com</u>, <u>fieldss@gtlaw.com</u>, <u>allison.mcgregor@gtlaw.com</u>

Will B. Geer on behalf of Creditor SummitBridge National Investments VIII, LLC wgeer@rlkglaw.com,

<u>dsideris@rlkglaw.com;willgeer@ecf.courtdrive.com;2836@notices.nextchapterbk.com;6717577420@filings.docketbird.com;emiller@rlkglaw.com;lmassey@rlkglaw.com;lpolvino@rlkglaw.com</u>

Aaron Michael Halegua on behalf of Creditor Can Gen Han ah@aaronhalegua.com, 7457448420@filings.docketbird.com

Aaron Michael Halegua on behalf of Creditor Hai Tao Sun ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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Aaron Michael Halegua on behalf of Creditor Yu Cong Liu ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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Allison Jane McGregor on behalf of Debtor Wellmade Floor Coverings International, Inc. <u>allison.mcgregor@gtlaw.com</u>, <u>fieldss@gtlaw.com</u>

Allison Jane McGregor on behalf of JointAdmin Debtor Wellmade Industries MFR. N.A LLC <u>allison.mcgregor@gtlaw.com</u>, <u>fieldss@gtlaw.com</u>

Quan Andy Thanh Nguyen on behalf of Creditor Committee Committee of Creditors Holding Unsecured Claims

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