

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:)	
)	Chapter 11
)	
WELLMADE FLOOR COVERINGS)	Case No. 25-58764-sms
INTERNATIONAL, INC., <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	Re: Docket No. 137

**LIMITED OBJECTION OF THE COMMITTEE OF CREDITORS HOLDING
UNSECURED CLAIMS TO 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 Committee of Creditors Holding Unsecured Claims (the "Committee") of the above-captioned debtors and debtors in possession (the "Debtors") files this limited objection (this "Objection") to 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; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [Docket No. 137] (the "Bar Date Motion")² and respectfully states as follows:

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 defined herein shall have the meanings ascribed to them in the Bar Date Motion.



LIMITED OBJECTION

1. Certain of the Debtors' employees or workers who worked at the Debtors' factory that may have claims against the estate are non-English-speaking individuals with whom the Debtors communicated with primarily via messaging app (such as WeChat). In order for effective notice to be made to these individuals, the Committee requests that:

- a sentence be added in the proposed bar date notice in Spanish and in Chinese that the Bar Date Notice is available in Spanish or Chinese on the Debtors' claims agent website maintained in these cases or upon contacting Debtors' counsel upon request;
- a shorter, simplified form of the Bar Date Notice be translated into Spanish and Chinese and posted on the Debtors' claims agent website;
- former and current employees be notified not only by email, but also by messaging app if that was the form of communication used for those individuals pursuant to the Debtors' ordinary course past practices;
- if any claims are filed that are written in Spanish or Chinese, the Committee requests that such claims not be automatically disallowed because they are not written in English.

2. Relief in the nature requested by the Committee has been approved in other cases with non-native English speaking claimant populations and is necessary and appropriate in order to effectively provide the necessary due process on potential claimants.³

³ See *Order Establishing Deadlines for Filing Proofs of Claims and Approving the Form and Manner of Notice Thereof* [Docket No. 333], *In re The Roman Catholic Diocese of Rockville Centre, New York*, Case No. 20-12345 (SCC) (Bankr. SDNY); See *Order: (1) Fixing Time for Filing Proofs of Claim; (2) Approving Claim Forms; and (3) Approving Manner and Form of Notice* [Docket No. 262], *In re The Roman Catholic Bishop of Stockton*, Case No. 14-20371-C-11 (Bankr. E.D. Cal.).

3. Finally, the Committee notes that paragraph 7(d) of the proposed order approving the Bar Date Motion (and the corresponding paragraph in the Bar Date Notice) is misplaced and should be moved to paragraph 8 as it appears to capture those categories of ordinary course administrative claimants that should not be required to file claims (as opposed to are required to file claims) by the Bar Date.

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

(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, any claims asserting priority pursuant to section 503(b)(9) of the Bankruptcy Code)

4. The Committee also notes that the term “Bankruptcy Code” should be defined in the Bar Date Notice and any references to specific provisions of section 101 should be footnoted if they are not already set forth therein.

5. Prior to the filing of this Objection, the Committee submitted suggested modifications to the proposed bar date order to resolve the Objection, but the Committee has not yet seen a revised proposed form of order addressing the Committee’s issues above.

RESERVATION OF RIGHTS

6. The Committee reserves the right to review and comment on any further revised proposed bar date order and reserves all rights, claims, defenses, and remedies, including, without limitation, to supplement and amend this Objection, to raise other and further objections to the Bar Date Motion and the form of any order, and to introduce evidence prior to or at any hearing regarding the Bar Date Motion in the event that the Committee’s objections are not resolved prior to such hearing.

WHEREFORE, for the foregoing reasons, the Committee respectfully requests that the Court modify the proposed bar date order as set forth above and grant such other and further relief as the Court deems just and proper.

Dated: September 15, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Shirley S. Cho

Signed w/express permission by Anna M. Humnicky

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-and-

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***Local Counsel to the Committee of
Creditors Holding Unsecured Claims***

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:

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

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 on this date I filed and served copies of the foregoing *Limited Objection of the Committee of Creditors Holding Unsecured Claims to 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* by using the 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 Court's Electronic Case Filing program, as indicated in **Exhibit A** as well as by First Class U.S. Mail as indicated in **Exhibit A**.

This 15th day of September 2025.

SMALL HERRIN, LLP

*Local Counsel to the Committee of Creditors
Holding Unsecured Claims*

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Exhibit A

Via CM/ECF –

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Via U.S. Mail –

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