

**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. 134

**STIPULATION WITH PREPETITION LENDER EXTENDING
COMMITTEE CHALLENGE PERIOD PURSUANT TO FINAL FINANCING ORDER**

This stipulation (this “Stipulation”) is entered into by and among: (a) the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and (b) AHF IC, LLC in its capacity as successor-by-assignment to Northwest Bank (the “Prepetition Lender”), pursuant to the Prepetition Loan Documents (as defined in the Final Order, as defined below). The Committee and the Prepetition Lender are collectively referenced herein as the “Parties.”

WHEREAS, on August 4, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code before the United States Bankruptcy Court for the Northern District of Georgia (the “Court”).

WHEREAS, on August 14, 2025, the Office of the U.S. Trustee appointed the Committee in the Debtors’ chapter 11 cases.

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.



WHEREAS, on September 2, 2025, the Court entered the *Final Order (A) Granting Debtors' Motion for (1) Authority to Incur Post-Petition Secured Indebtedness, (2) Authority to Grant Superpriority Status Pursuant to 11 U.S.C. § 364(c), and (3) Authority to Grant Priming Liens Pursuant to 11 U.S.C. § 364(d), (B) Authorizing Postpetition Use of Cash Collateral and Granting Adequate Protection, (C) Modifying the Automatic Stay, and (D) Granting Related Relief* [Docket No. 134] (the "Final Order").² The Final Order, among other things, set a Challenge Period ending, solely with respect to the Committee, on September 26, 2025, or such later date agreed to in writing by the Prepetition Lender, in its sole discretion, by which the Committee could assert any Claims and Defenses with respect to the Debtors' various stipulations, waivers, and admissions in favor of the Prepetition Lender under the Final Order.

WHEREAS, in order to extend the Challenge Period under the Final Order, the Parties have agreed to enter into this Stipulation.

NOW, THEREFORE, the Parties, by and through their respective undersigned counsel, hereby stipulate and agree as follows:

1. The Challenge Period under the Final Order with respect to the Committee is extended through and including the later of (a) November 30, 2025 or (b) consummation of a sale of substantially all of the Debtors' assets at a purchase price exceeding the Prepetition Obligations.

2. This Stipulation will be binding and effective upon execution by the Parties hereto. This Stipulation may not be amended or modified without the written consent of the Parties. This Stipulation may be executed in counterparts by facsimile or other electronic transmission, each of which will be deemed an original, and all of which when taken together will constitute one document.

² Capitalized terms used but not defined herein shall the meanings ascribed to such terms in the Final Order.

3. Except as expressly set forth in paragraph 1 above, nothing herein shall (or shall be deemed to) modify, amend or derogate from the Final Order. The Court will retain jurisdiction over all matters related to this Stipulation and the Final Order.

[signature pages follow]

Dated: September 25, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Maxim B. Litvak

Signed w/express permission by Anna M. Humnicky

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***Counsel to the Committee
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-and-

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/s/ Anna M. Humnicky

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***Local Counsel to the Committee of
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/s/ W. Austin Jowers signed w/express permission by Anna M. Humnicky

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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 STIPULATION WITH PREPETITION LENDER EXTENDING COMMITTEE CHALLENGE PERIOD PURSUANT TO FINAL FINANCING 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**.

This 25th day of September 2025.

SMALL HERRIN, LLP

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

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Exhibit A

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