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)

DEBTORS' MOTION FOR ENTRY OF AN ORDER (A) CONDITIONALLY APPROVING THE DISCLOSURE STATEMENT, (B) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE PLAN, (C) APPROVING THE FORM OF BALLOT AND SOLICITATION MATERIALS, (D) ESTABLISHING VOTING RECORD DATE, (E) FIXING THE DATE, TIME, AND PLACE FOR THE HEARING ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN AND THE DEADLINE FOR FILING OBJECTIONS THERETO, AND (F) APPROVING RELATED NOTICE PROCEDURES AND DEADLINES

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), submit this motion (the "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to sections 105, 1125, 1126, and 1128 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 2002, 3016, 3017, 3018, and 3020 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rules 3018-1, 9013-1, and 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"), (a) conditionally approving the *Disclosure Statement for Debtors' Chapter 11 Plan* [Docket No. 386] (as may be amended, modified, or supplemented from time to time, the

[1] The Debtors in these 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 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

"Disclosure Statement"); (b) approving procedures for the solicitation and tabulation of votes to accept or reject the *Debtors' Chapter 11 Plan* [Docket No. 385] (as may be amended, supplemented, or otherwise modified from time to time, and including all exhibits thereto, the "Plan") and opting out of the Third-Party Release;[2] (c) approving the form of ballots, notices, and solicitation materials; (d) establishing a voting record date; (e) approving the Solicitation Packages (as defined herein); (f) fixing the date, time, and place for the final hearing on approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing") and form of notice with respect thereto; and (g) approving related notices and deadlines. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 105, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3016, 3017, 3018, and 3020, Local Rules 3018-1, 9013-1, and 9013-2, and Section I of the Complex Case Procedures.

RELEVANT BACKGROUND

A. The Chapter 11 Cases

3. On August 4, 2025 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

[2] Capitalized terms not otherwise defined herein shall have the meanings attributed to such terms in the Plan or Disclosure Statement, as applicable.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On August 14, 2025, the United States Trustee for Region 21 (the "U.S. Trustee") appointed an official committee of unsecured creditors (the "Creditors' Committee") in the above-captioned chapter 11 cases (the "Cases").

6. No request has been made for the appointment of a trustee or an examiner.

7. Additional information regarding the Debtors' businesses, capital structure, and the circumstances leading to the filing of these Cases is set forth in the First Day Declaration [Docket No. 14] and the Disclosure Statement, which are fully incorporated herein by reference.

B. Summary of the Plan and Treatment of Claims and Interests[3]

8. As described and set forth in greater detail in the Disclosure Statement and Plan, the Court previously approved the Debtors' sale of substantially all of their assets, which closed on November 7, 2025. The Plan permits distribution of the remaining proceeds[4] received from the sale. The Plan also incorporates a settlement among the Debtors, the Individual Defendants and the Labor Plaintiffs.[5] The Debtors believe that the Plan provides the most efficient means to conclude the Cases and distribute the assets available to holders of allowed claims.

9. In general, the Plan provides for the appointment of a Plan Administrator to administer the Debtors' remaining assets and make distribution to holders of allowed claims and interests.

10. The Plan provides for the following classification and treatment of claims and

[3] The summary overview of the Plan herein is included for convenience and is qualified in all respects by the express terms of the Plan and Disclosure Statement.
[4] Certain of the proceeds were used to satisfy the DIP Lender's Loans and the Prepetition Lender's Loans.
[5] The terms of the Labor Plaintiffs Settlement are discussed further in Article VI.I of the Disclosure Statement and the *Debtors' Motion Pursuant to Federal Rule of Bankruptcy Procedure 9019 for Entry of an Order Approving Settlement and Compromise Between the Debtors, Individual Defendants and Labor Plaintiffs* [Docket No. 379] which is currently pending before the Court.

interests:

Class	Claim or Interest	Treatment	Status	Voting Rights
1	Secured Claims	In full and final satisfaction of each Allowed Secured Claim (unless the applicable Holder agrees to a less favorable treatment), each Holder thereof will receive at the option of the Debtors or the Plan Administrator, as applicable: (a) payment in full in Cash, payable on the later of the Effective Date and the date that is 10 Business Days after the date on which such Other Secured Claim becomes an Allowed Other Secured Claim, in each case, or as soon as reasonably practicable thereafter, (b) delivery of the collateral securing any such Claim, or (c) such other treatment rendering such Claim Unimpaired.	Unimpaired	Deemed to Accept
2	Other Priority Claims	In full and final satisfaction of each Allowed Other Priority Claim (unless the applicable Holder agrees to a less favorable treatment), each Holder thereof will receive payment in full in Cash or other treatment rendering such Claim Unimpaired.	Unimpaired	Deemed to Accept
3	Labor Plaintiff Claims	In full and final satisfaction of the Labor Plaintiff Claims, consistent with the Labor Plaintiffs Settlement, the Labor Plaintiffs will receive payment, through their counsel, of the Labor Plaintiff Claims in full in Cash.	Impaired	Entitled to Vote
4	General Unsecured Claims	In full and final satisfaction of each General Unsecured Claim (unless the applicable Holder agrees to a less favorable treatment), each Holder thereof will receive payment in full in Cash rendering such Claim Unimpaired.	Unimpaired	Deemed to Accept
5	Interests	After payment in full of all Allowed Claims, holders of Interests shall receive and retain all remaining property of the Debtors' Estates in accordance with their respective rights under applicable non-bankruptcy law.	Unimpaired	Deemed to Accept

11. As set forth above, Holders of Labor Plaintiff Claims in Class 3 are entitled to vote on the Plan. All other Holders of Claims or Interests are not entitled to vote on the Plan because such Holder holds a Claim or Interest that is not impaired under the Plan, and therefore, such Holder is deemed to have accepted the Plan pursuant to section 1126(f) of the Bankruptcy Code.

12. Additionally, in accordance with the Complex Case Procedures, the Debtors

highlight the following provisions of the Plan:

- Consensual Third-Party Release. Article IX.D of the Plan provides for a consensual release of certain non-Debtor parties by Holders of Claims or Interests who do not opt out of the Third-Party Release. As courts in this district have recognized, notice and an opportunity to opt out is adequate to constitute consent. *See In re LaVie Care Ctrs.,* Case No. 24-55507-PMB, 2024 Bankr. LEXIS 2900, at *22 (Bankr. N.D. Ga. Dec. 5, 2024). Consistent with the memorandum opinion in *LaVie*, the Plan further provides that a Holder of a Claim or Interest who does not return a Ballot or election form or file an objection to the Third-Party Release and believes that it should not be deemed to have consented to the Third-Party Release may seek relief from the Bankruptcy Court to exercise rights free of the Third-Party Release by rebutting the presumption that it consented.

- Release of Insiders. Article IX.C of the Plan provides for a release by the Debtors of certain "Released Parties" which includes: (a) Ming "Allen" Chen, Debtors' Director and President, (b) Zhu "George" Chen, Debtors' former manager, (c) Jiayi "Morgan" Chen, nephew of George Chen and former employee of the Debtors, and (d) David Baker in his capacity as Chief Restructuring Officer of the Debtors.

- Section 1146 Exemption. Article IV.L of the Plan provides for an exemption under section 1146(a) of the Bankruptcy Code for any transfers of property pursuant to the Plan.

RELIEF REQUESTED

13. To facilitate consideration of the Disclosure Statement and the Plan, the Debtors hereby seek entry of the Proposed Order:

a) conditionally approving the proposed Disclosure Statement as containing "adequate information" for the purposes of section 1125 of the Bankruptcy Code;

b) approving procedures for: (i) soliciting, receiving, and tabulating votes to accept or reject the Plan; (ii) voting to accept or reject the Plan; (iii) opting out of the Third-Party Release; and (iv) filing objections to the Plan (the "Solicitation and Voting Procedures");

c) approving the form ballots (collectively, the "Ballots") for allowed claims in Voting Classes (as defined herein) attached to the Proposed Order as **Exhibit 1**;

d) approving the forms of the following notices: (i) notice to holders of Unimpaired Claims and Interests (the "Non-Voting Status Notices"), substantially in the forms attached to the Proposed Order as **Exhibit 2**;

e) establishing July 6, 2026, as the Voting Record Date;

f) approving the Solicitation Packages (as defined herein) as being in compliance with Bankruptcy Rules 3017(d) and 2002(b);

g) approving the form and manner of notice of the Combined Hearing, substantially in the form attached to the Proposed Order as **Exhibit 3** (the "Combined Hearing Notice"); and

h) establishing the following dates and deadlines, subject to modification as necessary:

Event	Date/Deadline
Hearing on Solicitation Motion and Approval of the Disclosure Statement (if required)	July 21, 2026, at 10:00 a.m. (ET)
Voting Record Date	July 6, 2026
Solicitation Deadline	Three business days after entry of the Solicitation Procedures Order
Rule 3018 Motion Deadline	August 10, 2026, at 4:00 p.m. (ET)
Plan Supplement Deadline	August 17, 2026, at 4:00 p.m. (ET)
Voting Deadline	August 20, 2026, at 4:00 p.m. (ET)
Disclosure Statement and Confirmation Objection Deadline	August 20, 2026, at 4:00 p.m. (ET)
Deadline to File Balloting Report	August 24, 2026
Deadline to File (i) Consolidated Reply to Objections and Brief in Support of Confirmation, (ii) Responses to Rule 3018 Motions, and (iii) Proposed Form of Confirmation Order	August 24, 2026, at 4:00 p.m. (ET)
Combined Hearing	August 27, 2026, at 10:00 a.m. (ET)

BASIS FOR RELIEF

I. Conditional Approval of the Disclosure Statement

14. Section 1125 of the Bankruptcy Code requires that a disclosure statement be approved by the court as containing "adequate information" prior to a debtor's solicitation of acceptances or rejections of a plan. *See* 11 U.S.C. § 1125(b). "Adequate information" is defined

in the Bankruptcy Code as:

> [I]nformation of a kind, and in sufficient detail, as far as is reasonably practicable in light of the nature and history of the debtor and the condition of the debtor's books and records, including a discussion of the potential material Federal tax consequences of the plan to the debtor, any successor to the debtor, and a hypothetical investor typical of the holders of claims or interests in the case, that would enable such a hypothetical investor of the relevant class to make an informed judgment about the plan, . . . [I]n determining whether a disclosure statement provides adequate information, the court shall consider the complexity of the case, the benefit of additional information to creditors and other parties in interest, and the cost of providing additional information.

Id. § 1125(a)(1). Thus, the disclosures must provide information that is "reasonably practicable" to permit an "informed judgment" by creditors and interest holders entitled to vote on the debtor's plan of reorganization. *In re New Power Corp.*, 438 F.3d 1113, 1118 (11th Cir. 2006). Essentially, a disclosure statement "must clearly and succinctly inform the average unsecured creditor what it is going to get, when it is going to get it, and what contingencies there are to getting its distribution." *In re Ferretti*, 128 B.R. 16, 19 (Bankr. D.N.H. 1991).

15. Courts have broad discretion in determining whether a disclosure statement contains "adequate information," employing a flexible approach based on the unique facts and circumstances of each case. *See, e.g.*, *In re Ionosphere Clubs, Inc.*, 179 B.R. 24, 29 (S.D.N.Y. 1995) ("The determination of what is adequate information is subjective and made on a case by case basis. This determination is largely within the discretion of the bankruptcy court.") (internal citation omitted); *In re Nw. Recreational Activities, Inc.*, 8 B.R. 10, 11 (Bankr. N.D. Ga. 1980) ("The quality of the Disclosure Statement which will qualify as 'adequate information' will vary with the circumstances. The kind and form of information is left to the judicial discretion of the court on a case by case basis."); *In re Brandon Mill Farms, Ltd.*, 37 B.R. 190, 191–92 (Bankr. N.D. Ga. 1984) ("Beyond the statutory guidelines described in the definition of 'adequate information,'

the decision to approve or reject a disclosure statement is within the discretion of the Bankruptcy Court.").

16. Employing a flexible approach to approval of disclosure statements, courts have identified several categories of information which, based on the facts of a particular case, should typically be included in a disclosure statement. *See, e.g.*, *In re Metrocraft Pub. Serv., Inc.*, 39 B.R. 567, 568 (Bankr. N.D. Ga. 1984) (listing 19 factors that the court considered relevant in evaluating the adequacy of a disclosure statement). Relevant factors for evaluating the adequacy of a disclosure statement may include:

a) the events which led to the filing of a bankruptcy petition;

b) a description of the available assets and their value;

c) the anticipated future of the company;

d) the source of information stated in the disclosure statement;

e) a disclaimer;

f) the present condition of the debtor while in Chapter 11;

g) the scheduled claims;

h) the estimated return to creditors under a Chapter 7 liquidation;

i) the accounting method utilized to produce financial information and the name of the accountants responsible for such information;

j) the future management of the debtor;

k) the Chapter 11 plan or a summary thereof;

l) the estimated administrative expenses, including attorneys' and accountants' fees;

m) the collectability of accounts receivable;

n) financial information, data, valuations or projections relevant to the creditors' decision to accept or reject the Chapter 11 plan;

o) information relevant to the risks posed to creditors under the plan;

p) the actual or projected realizable value from recovery of preferential or otherwise voidable transfers;

q) litigation likely to arise in a non-bankruptcy context;

r) tax attributes of the debtor; and

s) the relationship of the debtor with affiliates.

See Id. Importantly, disclosure of every factor is not necessary in every case. *See id*.

17. Here, the Disclosure Statement contains "adequate information" within the meaning of section 1125 of the Bankruptcy Code and, accordingly, should be approved by the Court. Specifically, the Disclosure Statement contains descriptions and summaries of, among other things: (a) the business, corporate structure, and capital structure of the Debtors; (b) events leading up to the Cases and significant events that have occurred therein, including the sale of the Debtors' assets; (c) estimates of the projected amount of Allowed Claims in each Class and the projected recoveries to be received by Holders of Allowed Claims; (d) treatment of administrative, priority, and non-priority claims; (e) the terms of the Plan, including a chart describing the treatment of each Class; (f) the injunctions, releases, and exculpations provided by the Plan; (g) the feasibility of the Plan and a liquidation analysis under a hypothetical chapter 7 case; (h) risk factors that may affect the Plan; and (i) appropriate disclaimers regarding the Court's approval of information only as contained in the Disclosure Statement and Plan.

18. Accordingly, the Debtors submit that the Disclosure Statement contains "adequate information" within the meaning of section 1125 of the Bankruptcy Code and request that the Court approve the Disclosure Statement on a conditional basis to permit the Debtors to use it in the solicitation process as described herein.

II. Combined Hearing and Deadline for Objections

19. In accordance with the provisions of Bankruptcy Code section 1128(a) and Bankruptcy Rules 2002 and 3017, the Debtors request that the Court set **August 27, 2026 at 10:00 a.m. (prevailing Eastern Time)**, or such other time convenient for the Court, as the date and time for hearing on final approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing"). The Debtors also request that the Court order that the Combined Hearing may be continued from time to time by announcing such continuance in open court or otherwise, without further notice to parties-in-interest.

20. Bankruptcy Code section 1128(a) provides that "[a]fter notice, the court shall hold a hearing on confirmation of a plan." 11 U.S.C. § 1128(a). Bankruptcy Rule 3017(c) provides that "[o]n or before approval of the disclosure statement, the court . . . may fix a date for the hearing on confirmation." Fed. R. Bankr. P. 3017(c). Additionally, Bankruptcy Rule 2002(b) requires at least 28 days' notice by mail to all creditors and indenture trustees of the time fixed for filing objections to and the hearing to consider confirmation of a chapter 11 plan. *See* Fed. R. Bankr. P. 2002(b). Finally, Bankruptcy Code section 105(d) further provides that the Court "shall hold such status conferences as are necessary to further the expeditious and economical resolution of the case" and "may issue an order at any such conference prescribing such limitations and conditions as the court deems appropriate to ensure that the case is handled expeditiously and economically, including an order that . . . provides that the hearing on approval of the disclosure statement may be combined with the hearing on confirmation of the plan." 11 U.S.C. § 105(d)(2)(B)(vi).

21. Relief combining the Disclosure Statement and Plan confirmation hearings is appropriate here. As the Court is aware, the Labor Plaintiff Settlement, which resolves numerous outstanding claims and supports the proposed Plan, is currently pending approval before the Court. Under these circumstances, parties in interest already have a running start in evaluating creditor

recoveries in these cases. Furthermore, a streamlined confirmation process will inure directly to the benefit of the Debtors' estates and creditors by hastening the implementation of the Plan, reducing restructuring and other administrative expenses, and limiting the amount of time the Debtors remain in chapter 11.

22. The Debtors further request that the Court direct that objections to confirmation of the Plan, if any, (i) be made in writing; (ii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; (iii) state the name and address of the objecting party and the nature and amount of any claim or interest asserted by such party against the Debtors, their estates, or their property; (iv) state with particularity the legal and factual bases and nature of any objection to the Plan; (v) be filed with the Court and served on: (a) counsel for the Debtors, Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (Elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com); (b) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, New York, New York 10017, Attn: Bradford J. Sandler (Bsandler@pszjlaw.com) and Cia Mackle (Cmackle@pszjlaw.com); and (c) the United States Trustee of the Northern District of Georgia, 362 Richard B. Russell Building, 75 Ted Turner Drive, S.W., Atlanta, GA 30303 Attn: Lindsay Kolba (Lindsay.P.Kolba@usdoj.gov) (collectively, the "Notice Parties"), so as to be **actually received** no later than **August 20, at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"), which is 7 days before the date of the Combined Hearing. The Debtors propose that the deadline to file a consolidated reply to any such objections be **August 24, 2026, at 4:00 p.m. (prevailing Eastern Time)**.

III. Proposed Voting Deadlines

A. Establishment of Voting Record Date

23. The Debtors request that the Court set **July 6, 2026** as the record date (the "Voting

Record Date") for determining (a) creditors and equity holders entitled to receive Solicitation Packages and related materials, if any, and (b) creditors entitled to vote to accept or reject the Plan and the creditor's corresponding claim, notwithstanding anything to the contrary in the Bankruptcy Rules. The proposed Voting Record Date coincides with the proposed hearing on this Motion.

B. Establishment of Voting Deadline

24. Bankruptcy Rule 3017(c) requires the Court to "set a deadline for the holders of claims and interests to accept or reject the plan." Fed. R. Bankr. P. 3017(c)(1). The Debtors request that the Court fix **August 20, 2026 at 4:00 p.m. (prevailing Eastern Time)** (the "Voting Deadline") as the deadline by which all Ballots for accepting or rejecting the Plan must be received by the Claims and Noticing Agent if they are to be counted. The Debtors also request that they be permitted, in their sole discretion, to extend, by oral or written notice to the Claims and Noticing Agent, the period of time during which Ballots will be accepted for any reason from any creditor or class of creditors.

IV. Content and Transmittal of Solicitation Packages, Including Ballots and Non-Voting Packages; Approval of Forms of Notice and Ballots

25. Bankruptcy Rule 3017(d) identifies the materials that must be provided to Holders of Claims and Interests for purposes of soliciting votes and providing adequate notice of the hearing on confirmation of a plan:

> (1) the plan or a court-approved summary of the plan;
>
> (2) the disclosure statement approved by the court;
>
> (3) notice of the time within which acceptances and rejections of the plan may be filed; and
>
> (4) any other information as the court may direct, including any court opinion approving the disclosure statement or a court-approved summary of the opinion.

Fed. R. Bankr. P. 3017(d).

26. Bankruptcy Rule 3017(d) further requires that a notice of the time for filing objections to and the hearing on confirmation of the plan be mailed to all creditors and equity security holders pursuant to Bankruptcy Rule 2002(b) and that a form of ballot conforming to the appropriate Official Form be mailed to creditors and equity security holders entitled to vote on the plan. *See* Fed. R. Bankr. P. 3017(d)(2).

A. Solicitation Packages

27. Within three business days after entry of the order (the "Solicitation Procedures Order") approving this Motion (the "Solicitation Procedures Order") (the "Solicitation Deadline"), the Debtors propose to mail or cause to be mailed by first-class mail to Holders of Claims in Class 3 (Labor Plaintiffs Claims), who are entitled to vote (collectively, the "Voting Classes"), a solicitation package (each, a "Solicitation Package") containing or directing the recipient to the following:

a) the Combined Hearing Notice;

b) the Disclosure Statement and Plan (including exhibits);

c) a copy of the Order entered by this Court approving the Motion (without exhibits);

d) an appropriate Ballot, substantially in the form attached to the Proposed Order as **Exhibit 1**;

e) a pre-addressed return envelope; and

f) such other materials as the Court may direct to include in the Solicitation Package.

28. The Debtors request permission, at their discretion, to provide the Disclosure Statement and Plan and the Order entered by this Court approving this Motion (without exhibits) to holders of Claims entitled to vote on the Plan in electronic medium (e.g., flash drive, QR code, or hyperlink to the relevant document). The Ballots and the Combined Hearing Notice will be

distributed on paper, and the Debtors propose that Holders of Claims or Interests in a Voting Class be permitted (but not required) to submit their Ballots to the Claims and Noticing Agent electronically pursuant to the instructions set forth on each Ballot. The Debtors further propose that they will provide, at their expense, paper copies of any electronically distributed documents upon request of any party-in-interest to the Claims and Noticing Agent.

29. Bankruptcy Rule 3017(d) provides that ballots for accepting or rejecting a plan should conform substantially to Official Form No. 14. The forms of ballot, attached as **Exhibit 1** to the Proposed Order, for holders of claims in Class 3 are derived from Official Form No. 14, but include certain modifications and instructions necessary to facilitate voting and to meet the particular requirements of the Plan.

30. The appropriate Ballot form will be distributed to Holders of Claims in Class 3 who are entitled to vote to accept or reject the Plan.[6]

31. So as to avoid duplication and reduce expense, and except as otherwise set forth herein, the Debtors propose that (a) creditors holding (i) unclassified claims or unimpaired claims and also (ii) claims in a class that is designated as impaired and entitled to vote under the Plan receive only the Solicitation Package appropriate for the applicable impaired class; and (b) creditors who have filed duplicate claims in any given class (i) receive only one Solicitation Package and one Ballot for voting their claims with respect to that class, and (ii) be entitled to vote their claim only once with respect to that class.

B. Non-Voting Packages

32. Pursuant to section 1126(f) of the Bankruptcy Code, Holders of Claims or Interest

[6] For the avoidance of doubt, as described in the proposed Tabulation Procedures herein, the Debtors propose that Ballots will not be sent to any creditor who (a) failed to timely file a proof of claim, and whose claim is listed as contingent, unliquidated, or disputed in the Debtors' Schedules, or (b) is otherwise not entitled to vote in accordance with the procedures set forth herein.

in Classes 1, 2, 4, and 5 under the Plan are unimpaired, are deemed to have accepted the Plan, and are not entitled to vote. *See* 11 U.S.C. § 1126(f). Accordingly, the Debtors submit that they should not be required to transmit Solicitation Packages to Holders of Claims or Interests in Classes 1, 2, 4, and 5 (collectively, the "Non-Voting Classes") under the Plan.

33. Therefore, the Debtors propose to mail or cause to be mailed by first-class mail to Holders of Claims in the Non-Voting Classes, who are unimpaired and deemed to have accepted the Plan, a copy of the Notice of Non-Voting Status for Unimpaired Classes and Opt Out Form, substantially in the form attached to the Proposed Order as **Exhibit 2**. Each Non-Voting Status Notice shall be mailed on before the Solicitation Deadline.

34. The Debtors submit that such limited disclosure is consistent with Bankruptcy Rule 3017(d). Nonetheless, out of an abundance of caution, the Debtors request that the Non-Voting Status Notices be deemed to constitute adequate alternative disclosure to impaired non-voting classes under section 1125(c) of the Bankruptcy Code and an adequate summary plan under Bankruptcy Rule 3017(d).

C. Combined Hearing Notice

35. No later than the Solicitation Deadline, the Debtors propose to mail or cause to be mailed by first-class mail to all of their known creditors and all other entities required to be served under Bankruptcy Rules 2002 and 3017, the Combined Hearing Notice, substantially in the form attached to the Proposed Order as **Exhibit 3**, which form the Debtors hereby request the Court approve.

D. When No Notice or Transmittal Necessary

36. Because sending Solicitation Packages and other notices to outdated or otherwise improper addresses results in needless expense to the Debtors' estates, the Debtors request authority not to provide notice or service of any kind upon any person or entity to whom the

Debtors mailed a notice of the meeting of creditors under section 341 of the Bankruptcy Code or notice of the Bar Dates for filing proofs of claim and received either of such notices returned by the United States Postal Service marked "undeliverable as addressed," "moved—left no forwarding address," "forwarding order expired," or similar marking or reason, unless the Debtors have been informed in writing by such person or entity of that person's or entity's new address. Additionally, the Debtors anticipate that some of the Solicitation Packages or other solicitation-related notices described herein may be returned as undeliverable. The Debtors request that they not be required to re-mail undelivered Solicitation Packages or other undeliverable solicitation-related notices that were returned marked "undeliverable as addressed," "moved—left no forwarding address," "forwarding order expired," or similar marking or reason, unless the Debtors have been informed in writing by such person or entity of that person's or entity's new address.

37. The foregoing procedures regarding the provision of notice of the Combined Hearing and related matters comply with Bankruptcy Rules 2002 and 3017. Accordingly, the Debtors request that the Court approve the above-described notice as good and sufficient in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Complex Case Procedures.

V. Voting and Tabulation Procedures

38. Section 1126(c) of the Bankruptcy Code provides that a class of claims has accepted a plan if such plan has been accepted by creditors that hold at least two-thirds in dollar amount and more than one-half in number of the allowed claims in that class that have actually cast ballots for acceptance or rejection of the plan. *See* 11 U.S.C. § 1126(c). Pursuant to the *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. 222] (the

"Bar Date Order"), the Claims Bar Date (as defined in the Bar Date Order) was November 21, 2025, at 5:00 p.m. (ET).

39. Accordingly, for purposes of voting on the Plan, the Debtors request that each Claim (a) for which a Proof of Claim was or is timely received, or (b) that is listed in the Debtors' Schedules and not listed as disputed, contingent, or unliquidated as to amount, except to the extent superseded by a timely filed Proof of Claim, and as to which no objection to the allowance thereof has been filed prior to entry of the Proposed Order, be deemed allowed, to the extent required, solely for voting purposes.

40. The Claim amount established herein shall control for voting purposes only and shall not constitute the Allowed amount of any Claim. In tabulating votes, the following hierarchy shall be used to determine the amount of the Claim associated with each claimant's vote:

a) the Claim amount (i) settled and/or agreed upon by the Debtors, as reflected in a document filed with the Court, (ii) set forth in an Order of the Court, or (iii) set forth in a document executed by the Debtors pursuant to authority granted by the Court;

b) if an objection has not been filed to a Claim, the Claim amount contained in a Proof of Claim that has been timely filed by the applicable deadline established by the Bar Date Order (or deemed timely filed by the Court under applicable law), provided, however, that any Ballot cast by a Holder of a Claim who timely files a Proof of Claim in respect of (i) a contingent Claim or a Claim in a wholly unliquidated or unknown amount (based on a reasonable review by the Debtors and/or Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "Claims and Noticing Agent")) that is not the subject of an objection will count toward satisfying the numerosity requirement of section 1126(c) of the Bankruptcy Code and will count as a Ballot for a Claim in the amount of $1.00 solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code, and (ii) a partially liquidated and partially unliquidated Claim, such Claim will be allowed for voting purposes only in the liquidated amount; provided further, however, that to the extent the Claim amount contained in the Proof of Claim is different from the Claim amount (A) settled and/or agreed upon by the Debtors, as reflected in a document filed with the Court, (B) set forth in an Order of the Court, or (C) set forth in a document executed by the Debtors pursuant to authority granted by the Court, such Claim amount shall supersede the Claim amount set forth on the respective Proof of Claim for voting purposes;

c) if an objection has not been filed to a Claim, the Claim amount listed in the Schedules (to the extent such Claim is not superseded by a timely filed Proof of Claim); provided that such Claim is not scheduled as contingent, disputed, or unliquidated and/or has not been paid in full;

d) timely-filed Proofs of Claim based on litigation or tort claims will be presumed to be unliquidated, contingent, and/or disputed unless sufficient supporting documentation of a final judgment or settlement was attached to the timely filed proof of claim, as determined by the Debtors or the Claims and Noticing Agent, and such unsupported claims shall be entitled to vote in the amount of $1.00;

e) if a proof of claim has been amended by a later-filed proof of claim that is filed prior to the Voting Record Date, the later-filed amending claim will be entitled to vote in a manner consistent with these voting rules and the Tabulation Procedures, and the earlier filed claim will be disallowed for voting purposes, regardless of whether the Debtors have objected to such amended claim;

f) proofs of claim for $0.00 are not entitled to vote; and

g) in the absence of any of the foregoing, such Claim shall not be counted for voting purposes.

41. The Debtors propose that the following procedures be utilized in tabulating the votes to accept or reject the Plan (the "Tabulation Procedures") and respectfully requests that the Tabulation Procedures be approved:

a) Unless agreed to by the Debtors or otherwise ordered by the Court, any Ballots received after the Voting Deadline will not be accepted or counted by the Debtor in connection with the Debtor's request for confirmation of the Plan.

b) Any Ballot that does not indicate an acceptance or rejection of the Plan or that indicates both an acceptance and rejection of the Plan will not be counted.

c) Any Ballot that is returned indicating acceptance or rejection of the Plan but is unsigned will not be counted.

d) Whenever a Holder casts more than one Ballot voting the same Claim prior to the Voting Deadline, only the latest-dated Ballot timely received will be deemed to reflect the voter's intent and will thus supersede any prior Ballot(s).

e) If a Holder casts simultaneous duplicative Ballots that are voted inconsistently, such Ballots will not be counted.

f) Each Holder will be deemed to have voted the full amount of its Claim as set forth on the Ballot.

g) Ballots partially rejecting and partially accepting the Plan will not be counted.

h) The method of delivery of Ballots to the Claims and Noticing Agent is at the risk of each Holder, and such delivery will be deemed made only when the original Ballot is actually received by the Claims and Noticing Agent.

i) Ballots sent directly to the Debtors will not be counted.

j) The Debtors have the right to amend the terms of the Plan (subject to compliance with section 1127 of the Bankruptcy Code). If the Debtors make material changes in the terms of the Plan, the Debtors will disseminate additional solicitation materials and extend the solicitation period, in each case, to the extent required by law or further Order of the Court.

k) If a Ballot is executed by a trustee, executor, administrator, guardian, attorney-in-fact, officer of a corporation, or other person acting in a fiduciary or representative capacity on behalf of a Holder, such person will be required to indicate such capacity when signing and, at the Claims and Noticing Agent's discretion, must submit proper evidence satisfactory to the Claims and Noticing Agent to so act on behalf of the Holder.

l) Any Holder who has delivered a valid Ballot voting on the Plan may withdraw such vote solely in accordance with Bankruptcy Rule 3018(a).

m) Subject to any contrary Order of the Court, the Debtors have the right to waive any defects or irregularities or conditions of delivery as to any particular Ballot unless otherwise directed by the Court.

n) Unless waived or as ordered by the Court, any defects or irregularities in connection with deliveries of Ballots must be cured by the Voting Deadline or within such time as the Court determines, and unless otherwise ordered by the Court, delivery of such Ballots will not be deemed to have been made until such irregularities have been cured or waived.

o) Neither the Debtors nor any other person or entity will be under any duty to provide notification of defects or irregularities with respect to deliveries of Ballots nor will the Debtors or any other person incur any liability on account of or related to any failure to provide such notification. Unless otherwise directed by the Court, delivery of such Ballots will not be deemed to have been made until such irregularities have been cured or waived. Ballots previously furnished (and as to which any irregularities have not theretofore been cured or waived) will not be counted.

p) For purposes of determining whether the numerosity and amount requirements of section 1126(c) of the Bankruptcy Code have been satisfied,

the Claims and Noticing Agent will tabulate only those Ballots received prior to the Voting Deadline or as otherwise ordered by the Court.

q) Ballots received that do not evidence the amount or evidence an incorrect amount of a creditor's Claim shall be completed or corrected, as the case may be, based upon the terms of the Proposed Order.

42. Upon completion of the balloting, the Claims and Noticing Agent will generate a report (the "Balloting Report") certifying the amount and number of Allowed Claims of Class 3 accepting or rejecting the Plan. The Debtors propose filing the Balloting Report with the Court on or before **August 24, 2026**, which is three days prior to the proposed Combined Hearing.

43. The Debtors respectfully submit that the foregoing Tabulation Procedures will establish a fair and equitable voting process, particularly given the right of parties to seek temporary allowance of their Claims on some other basis, as described in greater detail herein.

NOTICE

44. Notice of this Motion has been given to the following parties or, in lieu thereof, to their counsel, if known: (a) the Office of the United States Trustee for the Northern District of Georgia; (b) holders of the thirty (30) largest unsecured claims against the Debtors on a consolidated basis; (c) counsel to the Committee; (d) the Prepetition Lender and Buyer; (e) counsel to the Debtors' postpetition secured lender (the "DIP Lender"); (f) the Internal Revenue Service; (g) the Office of the United States Attorney for the Northern District of Georgia; (h) the states attorneys general for states in which the Debtors conduct business; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

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

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: June 2, 2026

Respectfully submitted,

/s/ John D. Elrod

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Allison J. McGregor, Ga. Bar No. 860865
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Atlanta, GA 30305
Telephone: 678-553-2259
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Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2026, all ECF participants registered in this case were served electronically with the foregoing Motion through the Court's ECF system at their respective email addresses registered with this Court. The Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, will file a certificate of service on the docket to reflect any additional service of the foregoing Motion, including on the Limited Service List.

Dated: June 2, 2026

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
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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-SMS (Jointly Administered) **Docket No. __**

ORDER (A) CONDITIONALLY APPROVING THE DISCLOSURE STATEMENT (B) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT OR REJECT THE PLAN, (C) APPROVING THE FORM OF BALLOT AND SOLICITATION MATERIALS, (D) ESTABLISHING VOTING RECORD DATE, (E) FIXING THE DATE, TIME, AND PLACE FOR THE HEARING ON CONFIRMATION OF THE PLAN AND THE DEADLINE FOR FILING OBJECTIONS THERETO, AND (F) APPROVING RELATED NOTICE PROCEDURES AND DEADLINES

Upon the *Motion of the Debtors for Entry of an Order (A) Conditionally Approving the Disclosure Statement, (B) Establishing Procedures for Solicitation and Tabulation of Votes to*

[1] The Debtors in these 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 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

Accept or Reject the Plan, (C) Approving the Form of Ballot and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time, and Place for the Hearing on Confirmation of the Plan and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures and Deadlines filed on June 2, 2026 [Docket No. __] (the "Motion"),[2] for entry of an order approving: (a) the adequacy of information in the Disclosure Statement, (b) the Solicitation and Voting Procedures, (c) the form of Ballot and notices in connection therewith, and (d) certain deadlines with respect to voting and confirmation process, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and it appearing that due and adequate notice of the Motion has been given under the circumstances; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon the record of the Hearing, this Court having determined that there is good and sufficient cause for the relief set forth in this Order; and after due deliberation thereon,

IT IS HEREBY ORDERED THAT:

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

2. The Disclosure Statement is approved on an interim basis, subject to final approval at the Combined Hearing.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. As set forth and described further in this Order, the following dates and deadlines are approved:

Event	Date/Deadline
Hearing on Solicitation Motion and Approval of the Disclosure Statement (if required)	July 21, 2026, at 10:00 a.m. (ET)
Voting Record Date	July 6, 2026
Solicitation Deadline	Three business days after entry of the Solicitation Procedures Order
Rule 3018 Motion Deadline	August 10, 2026, at 4:00 p.m. (ET)
Plan Supplement Deadline	August 17, 2026, at 4:00 p.m. (ET)
Voting Deadline	August 20, 2026, at 4:00 p.m. (ET)
Disclosure Statement and Confirmation Objection Deadline	August 20, 2026, at 4:00 p.m. (ET)
Deadline to File Balloting Report	August 24, 2026
Deadline to File (i) Consolidated Reply to Objections and Brief in Support of Confirmation, (ii) Responses to Rule 3018 Motions, and (iii) Proposed Form of Confirmation Order	August 24, 2026, at 4:00 p.m. (ET)
Combined Hearing	August 27, 2026, at 10:00 a.m. (ET)

4. Combined Hearing. The hearing to consider final approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing") shall commence on **August 27, 2026, at 10:00 a.m. (prevailing Eastern Time)** in **Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**. The Combined Hearing may be continued from time to time by way of announcement of such continuance in open court or otherwise, without further notice to parties-in-interest.

5. Deadline and Procedures for Filing Objections to Confirmation. The deadline for

filing and serving objections to final approval of the Disclosure Statement and/or confirmation of the Plan shall be **August 20, 2026 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"). In order to be considered, objections, if any, to confirmation of the Plan must: (i) be made in writing; (ii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; (iii) state the name and address of the objecting party and the nature and amount of any claim or interest asserted by such party against the Debtors, their estates, or their property; (iv) state with particularity the legal and factual bases and nature of any objection to the Disclosure Statement or Plan; (v) be filed with the Court and served on: (a) counsel for the Debtors, Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (Elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com); (b) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, New York, New York 10017, Attn: Bradford J. Sandler (Bsandler@pszjlaw.com) and Cia Mackle (Cmackle@pszjlaw.com); and (c) the United States Trustee of the Northern District of Georgia, 362 Richard B. Russell Building, 75 Ted Turner Drive, S.W., Atlanta, GA 30303 Attn: Lindsay Kolba (Lindsay.P.Kolba@usdoj.gov) (collectively, the "Notice Parties"). The deadline for the Debtors to file a reply to any objections is **August 24, 2026, at 4:00 p.m. (prevailing Eastern Time)**. Objections to final approval of the Disclosure Statement or confirmation of the Plan not timely filed and served as set forth above shall not be considered by the Court and shall be overruled.

6. Any objections to the adequacy of the information contained in the Disclosure Statement are expressly reserved for consideration at the Combined Hearing. Any objections to: (a) the voting procedures to be utilized; (b) the forms of notices to be provided to creditors and interest holders; or (c) the forms of Ballots to be provided to creditors and interest holders that are

entitled to vote on the Plan shall not be considered at the time of the Combined Hearing.

7. Deadline and Procedures for Temporary Allowance of Claims for Voting Purposes. The deadline for filing and serving motions pursuant to Bankruptcy Rule 3018(a) seeking temporary allowance of claims for the purpose of accepting or rejecting the Plan ("Rule 3018 Motions") shall be **August 10, 2026, at 4:00 p.m. (prevailing Eastern Time)** (the "Rule 3018(a) Motion Deadline"). The Debtors shall have until **August 17, 2026, at 4:00 p.m. (prevailing Eastern Time)** to file and serve a response to any Rule 3018 Motion. Any hearing on a Rule 3018 Motion may be held on the same date and time as the Combined Hearing.

8. Any Ballot submitted by a Holder that files a Rule 3018 Motion will be counted solely in accordance with the Tabulation Procedures and other applicable provisions in this Order unless and until the underlying Claim is temporarily allowed by the Court for voting purposes in a different amount, after notice and a hearing.

9. Record Date. The record date for purposes of determining (a) creditors and equity holders entitled to receive Solicitation Packages and related materials, if any, and (b) creditors entitled to vote to accept or reject the Plan and the creditor's corresponding claim, shall be **July 6, 2026** (the "Voting Record Date").

10. Voting Deadline. To be counted, Ballots for accepting or rejecting the Plan must be received by the Claims and Noticing Agent by **August 20, 2026, at 4:00 p.m. (prevailing Eastern Time)** (the "Voting Deadline"). The Debtors are hereby authorized to extend, in their sole discretion, by oral or written notice to the Claims and Noticing Agent, the period of time during which Ballots shall be accepted for any reason from any creditor or class of creditors.

11. Solicitation Packages. Within three business days after entry of the Solicitation Procedures Order (the "Solicitation Deadline"), the Debtors shall mail or cause to be mailed by

first-class mail to holders of claims in Class 3, who are entitled to vote, a solicitation package (each, a "Solicitation Package") containing or directing the recipient to the following:

i. the Combined Hearing Notice;

ii. the Disclosure Statement and Plan (including exhibits);

iii. a copy of this Order (without exhibits);

iv. an appropriate Ballot, substantially in the form attached hereto as **Exhibit 1**, which form of Ballot is hereby approved;

v. a pre-addressed return envelope; and

vi. such other materials as the Court may direct to include in the Solicitation Package.

17. The contents of the Solicitation Packages comply with Bankruptcy Rules 2002 and 3017 and constitute sufficient notice to all parties-in-interest, including, without limitation, the Holders of Claims and Interests in the Debtors. The Debtors, at their discretion, may provide the Disclosure Statement and Plan and this Order (without exhibits) to holders of claims in electronic medium (e.g., flash drive, QR code, or hyperlink to the relevant document). Holders of Claims or Interests in a Voting Class may (but are not required to) submit their Ballots to the Claims and Noticing Agent electronically pursuant to the instructions set forth on each Ballot. The Debtors will provide, at their expense, paper copies of any electronically distributed documents upon request of any party-in-interest to the Claims and Noticing Agent. The Ballots and the Combined Hearing Notice shall be distributed on paper.

18. Creditors holding Claims in a Class that is designated as impaired and entitled to vote under the Plan shall receive only the Solicitation Package appropriate for the applicable impaired Class. Creditors holding (a) unclassified Claims or unimpaired Claims and also (b) Claims in a Class that is designated as impaired and entitled to vote under the Plan shall receive

only the Solicitation Package appropriate for the applicable impaired Class. Creditors who have filed duplicate Claims in any given Class or that hold Claims against the multiple Debtors in any given class (a) shall receive only one Solicitation Package and one Ballot for voting their claims with respect to that Class; and (b) shall be entitled to vote their Claim only once with respect to that Class. For the avoidance of doubt, each creditor shall only receive a single Ballot for each Voting Class even if such creditor holds claims against multiple Debtors.

19. On or before the Solicitation Deadline, the Debtors shall also mail or cause to be mailed by first-class mail to holders of claims in Class 1, Class 2, Class 4 and Class 5 under the Plan, who are unimpaired and deemed to have accepted the Plan, a copy of the Notice of Non-Voting Status for Unimpaired Classes and Opt Out Form, substantially in the form attached hereto as **Exhibit 2,** which form of Ballot is hereby approved. Further, the Non-Voting Packages are hereby deemed to constitute adequate alternative disclosure to non-voting classes under section 1125(c) of the Bankruptcy Code and adequate summary plans under Bankruptcy Rule 3017(d).

20. Combined Hearing Notice. On or before the Solicitation Deadline, the Debtors shall mail or cause to be mailed by first-class mail to all of their known creditors, equity security holders as of the Voting Record Date, and all other entities required to be served under Bankruptcy Rules 2002 and 3017, notice of the Combined Hearing substantially in the form attached hereto as **Exhibit 3** (the "Combined Hearing Notice"), which form is hereby approved.

21. When No Notice or Transmittal Necessary. Notwithstanding any provision of this Order to the contrary, no notice or service of any kind shall be required to be made upon any person or entity to whom the Debtors mailed a notice of the meeting of creditors under Bankruptcy Code section 341 or notice of the bar date for filing proofs of claim and received either of such notices returned by the United States Postal Service marked "undeliverable as addressed," "moved – left

no forwarding address," "forwarding order expired," or similar marking or reason, unless the Debtors have been informed in writing by such person or entity of that person's or entity's new address. The Debtors shall not be required to re-mail undelivered Solicitation Packages or other undeliverable solicitation-related notices that were returned marked "undeliverable as addressed," "moved – left no forwarding address," "forwarding order expired," or similar marking or reason, unless the Debtors have been informed in writing by such person or entity of that person's or entity's new address.

22. Classes Deemed to Accept. The Holders of Claims in Class 1, Class 2, Class 4 and Class 5 shall be deemed to have accepted the Plan, and the Debtors are not required to solicit votes on the Plan from such Holders.

23. Procedures for Vote Tabulation; Votes Counted. For purposes of voting on the Plan, each Claim (a) for which a Proof of Claim was or is timely received by the applicable deadline, or (b) that is listed in the Debtors' Schedules and not listed as disputed, contingent, or unliquidated as to amount, except to the extent superseded by a timely filed Proof of Claim, and as to which no objection to the allowance thereof has been filed prior to the Voting Record Date, shall be allowed, to the extent required, solely for voting purposes.

24. The Claim amount established herein shall control for voting purposes only and shall not constitute the Allowed amount of any Claim. In tabulating votes, the following hierarchy shall be used to determine the amount of the Claim associated with each Claimant's vote:

i. the Claim amount (i) settled and/or agreed upon by the Debtors, as reflected in a document filed with the Court, (ii) set forth in an Order of the Court, or (iii) set forth in a document executed by the Debtors pursuant to authority granted by the Court;

ii. if an objection has not been filed to a Claim, the Claim amount contained in a Proof of Claim that has been timely filed by the applicable deadline established by the Bar Date Order (or deemed timely filed by the Court under applicable law), provided, however, that any Ballot cast by a Holder

of a Claim who timely files a Proof of Claim in respect of (i) a contingent Claim or a Claim in a wholly unliquidated or unknown amount (based on a reasonable review by the Debtors and/or Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "Claims and Noticing Agent")) that is not the subject of an objection will count toward satisfying the numerosity requirement of section 1126(c) of the Bankruptcy Code and will count as a Ballot for a Claim in the amount of $1.00 solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code, and (ii) a partially liquidated and partially unliquidated Claim, such Claim will be allowed for voting purposes only in the liquidated amount; provided further, however, that to the extent the Claim amount contained in the Proof of Claim is different from the Claim amount (A) settled and/or agreed upon by the Debtors, as reflected in a document filed with the Court, (B) set forth in an Order of the Court, or (C) set forth in a document executed by the Debtors pursuant to authority granted by the Court, such Claim amount shall supersede the Claim amount set forth on the respective Proof of Claim for voting purposes;

iii. if an objection has not been filed to a Claim, the Claim amount listed in the Schedules (to the extent such Claim is not superseded by a timely filed Proof of Claim); provided that such Claim is not scheduled as contingent, disputed, or unliquidated and/or has not been paid in full;

iv. timely-filed Proofs of Claim based on litigation or tort claims will be presumed to be unliquidated, contingent, and/or disputed unless sufficient supporting documentation of a final judgment or settlement was attached to the timely filed proof of claim, as determined by the Debtors or the Claims and Noticing Agent, and such unsupported claims shall be entitled to vote in the amount of $1.00;

v. if a Proof of Claim has been amended by a later-filed proof of claim that is filed on or prior to the Voting Record Date, the later-filed amending claim will be entitled to vote in a manner consistent with these voting rules and the Tabulation Procedures, and the earlier filed claim will be disallowed for voting purposes, regardless of whether the Debtors have objected to such amended claim;

vi. proofs of claim for $0.00 are not entitled to vote;

vii. if an objection has been filed to a Claim and the Holder of such Claim timely files a Bankruptcy Rule 3018 Motion, the Claim amount set forth in the Order of the Court or as agreed between the Debtors and the Holder of such Claim in connection with such Rule 3018 Motion; and

viii. in the absence of any of the foregoing, such Claim shall not be counted for voting purposes.

46. The following procedures shall be utilized in tabulating Ballots (the "Tabulation Procedures"):

a) Unless agreed to by the Debtors or otherwise ordered by the Court, any Ballots received after the Voting Deadline will not be accepted or counted by the Debtor in connection with the Debtor's request for confirmation of the Plan.

b) Any Ballot that does not indicate an acceptance or rejection of the Plan or that indicates both an acceptance and rejection of the Plan will not be counted.

c) Any Ballot that is returned indicating acceptance or rejection of the Plan but is unsigned will not be counted.

d) Whenever a Holder casts more than one Ballot voting the same Claim prior to the Voting Deadline, only the latest-dated Ballot timely received will be deemed to reflect the voter's intent and will thus supersede any prior Ballot(s).

e) If a Holder casts simultaneous duplicative Ballots that are voted inconsistently, such Ballots will not be counted.

f) Each Holder will be deemed to have voted the full amount of its Claim as set forth on the Ballot.

g) Ballots partially rejecting and partially accepting the Plan will not be counted.

h) The method of delivery of Ballots to the Claims and Noticing Agent is at the risk of each Holder, and such delivery will be deemed made only when the original Ballot is actually received by the Claims and Noticing Agent.

i) Ballots sent directly to the Debtors will not be counted.

j) The Debtors have the right to amend the terms of the Plan (subject to compliance with section 1127 of the Bankruptcy Code). If the Debtors make material changes in the terms of the Plan, the Debtors will disseminate additional solicitation materials and extend the solicitation period, in each case, to the extent required by law or further Order of the Court.

k) If a Ballot is executed by a trustee, executor, administrator, guardian, attorney-in-fact, officer of a corporation, or other person acting in a fiduciary or representative capacity on behalf of a Holder, such person will be required to indicate such capacity when signing and, at the Claims and Noticing Agent's discretion, must submit proper evidence satisfactory to

the Claims and Noticing Agent to so act on behalf of the Holder.

l) Any Holder who has delivered a valid Ballot voting on the Plan may withdraw such vote solely in accordance with Bankruptcy Rule 3018(a).

m) Subject to any contrary Order of the Court, the Debtors have the right to waive any defects or irregularities or conditions of delivery as to any particular Ballot unless otherwise directed by the Court.

n) Unless waived or as ordered by the Court, any defects or irregularities in connection with deliveries of Ballots must be cured by the Voting Deadline or within such time as the Court determines, and unless otherwise ordered by the Court, delivery of such Ballots will not be deemed to have been made until such irregularities have been cured or waived.

o) Neither the Debtors nor any other person or entity will be under any duty to provide notification of defects or irregularities with respect to deliveries of Ballots nor will the Debtors or any other person incur any liability on account of or related to any failure to provide such notification. Unless otherwise directed by the Court, delivery of such Ballots will not be deemed to have been made until such irregularities have been cured or waived. Ballots previously furnished (and as to which any irregularities have not theretofore been cured or waived) will not be counted.

p) For purposes of determining whether the numerosity and amount requirements of section 1126(c) of the Bankruptcy Code have been satisfied, the Claims and Noticing Agent will tabulate only those Ballots received prior to the Voting Deadline or as otherwise ordered by the Court.

q) Ballots received that do not evidence the amount or evidence an incorrect amount of a creditor's Claim shall be completed or corrected, as the case may be, based upon the terms of the Proposed Order.

25. Certification of Vote. Upon completion of the balloting, the Claims and Noticing Agent will generate a report (the "Balloting Report") certifying the amount and number of Allowed Claims of Class 3 accepting or rejecting the Plan. The Debtors shall file the Balloting Report with the Court on or before **August 24, 2026** and shall post the Balloting Report on the Debtors' case website (https://www.veritaglobal.net/wellmade).

26. Filing of Plan Supplement. The Debtors shall file any Plan Supplement (as defined in the Plan) on or before **August 17, 2026**, and shall post any such Plan Supplement on the Debtors'

case website (https://www.veritaglobal.net/wellmade).

27. Proposed Confirmation Order. The Debtors shall file a proposed form of Confirmation Order by **August 24, 2026, at 4:00 p.m. (prevailing Eastern Time)**.

28. Service and Notice Adequate and Sufficient. Service of all notices and documents described herein in the time and manner set forth herein shall constitute due, adequate, and sufficient notice, and no other or further notice shall be necessary.

29. The Claims and Noticing Agent shall make the Combined Disclosure Statement and Plan, this Order, and all exhibits to this Order available on the case website and shall provide copies of the Disclosure Statement, Plan, this Order, and all exhibits to this Order free of charge to any party requesting such copies.

30. The Debtors are authorized to make non-substantive changes to the Disclosure Statement, the Plan, Ballots, and related documents without further Order of the Court, including without limitation, changes to correct typographical and grammatical errors and to make conforming changes among the Disclosure Statement, the Plan, the Ballots, the Notices of Non-Voting Status, the Combined Hearing Notice, and any other related materials prior to their mailing to parties-in-interest.

31. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.

32. Counsel for the Debtors, through Verita shall, within three (3) days of entry of this Order, cause a copy of this 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 DOCUMENT

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
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Counsel for the Debtors and Debtors in Possession

EXHIBIT 1

Class 3 Ballot
(Labor Plaintiff Claims)

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)

BALLOT FOR VOTING TO ACCEPT OR REJECT
DEBTORS' CHAPTER 11 PLAN

CLASS 3 – LABOR PLAINTIFF CLAIMS

PLEASE READ AND FOLLOW THE ENCLOSED INSTRUCTIONS FOR COMPLETING BALLOTS CAREFULLY *BEFORE* COMPLETING THIS BALLOT.

IN ORDER FOR YOUR VOTE TO BE COUNTED, THIS BALLOT MUST BE COMPLETED, EXECUTED, AND RETURNED SO AS TO BE ACTUALLY RECEIVED BY THE CLAIMS AND NOTICING AGENT BY AUGUST 20, 2026, AT 4:00 P.M., PREVAILING EASTERN TIME (THE "VOTING DEADLINE") IN ACCORDANCE WITH THE FOLLOWING:

The above-captioned debtors and debtors in possession (collectively, the "Debtors") are soliciting votes with respect to the *Debtors' Chapter 11 Plan* (as may be amended, supplemented, or otherwise modified from time to time, the "Plan"). The Bankruptcy Court for the Northern District of Georgia (the "Bankruptcy Court") has approved on an interim basis the Disclosure Statement as containing adequate information for solicitation purposes pursuant to section 1125 of title 11 of the United States Code (the "Bankruptcy Code") by entry of an order on [•], 2026 [Docket No. •] (the "Solicitation Procedures Order"). The Bankruptcy Court's interim approval of the Disclosure Statement does not indicate approval of the Plan by the Bankruptcy Court. Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Plan.

You are receiving this ballot (this "Ballot") because you are a Holder of a Class 3 Claim (a "Voting Class") as of **July 6, 2026** (the "Voting Record Date"). Accordingly, you have a right to vote to accept or reject the Plan.

[1] The Debtors in these 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 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

Your rights are described in the Disclosure Statement, which was included in the package (the "Solicitation Package") you are receiving with this Ballot (as well as the Plan, Solicitation Procedures Order, and certain other materials). If you received Solicitation Package materials in electronic format and desire paper copies, or if you need to obtain additional Solicitation Packages, you may obtain them by (a) writing via first class mail to Wellmade Ballot Processing, c/o Kurtzman Carson Consultants, LLC d/b/a Verita, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, (b) clicking the "Submit an Inquiry" option at https://www.veritaglobal.net/wellmade/inquiry, or (c) calling the Debtors' restructuring hotline at (866) 812-2297 (U.S./Canada) or (781) 575-4050 (International). You may also obtain copies of any pleadings filed in these Cases (a) for a fee via PACER at: http://www.ganb.uscourts.gov or (b) at no charge from Kurtzman Carson Consultants d/b/a Verita (the "Claims and Noticing Agent") by accessing the Debtors' restructuring website at https://www.veritaglobal.net/wellmade.

This Ballot may not be used for any purpose other than for casting votes to accept or reject the Plan and making certain certifications with respect to the Plan. If you believe you have received this Ballot in error, or if you believe you have received the wrong ballot, please contact the Claims and Noticing Agent immediately at the address, telephone number, or email address set forth above.

You should review the Disclosure Statement and Plan and the instructions contained herein before you vote. You may wish to seek legal advice concerning the Plan and the Plan's classification and treatment of your Claim. Your Claim has been placed in Class 3 under the Plan.

CAUTION - IF YOU DO NOTHING, YOUR RIGHTS MAY BE COMPROMISED. PLEASE PAY CAREFUL ATTENTION TO THE BELOW DISCLOSURE, AND IF YOU DO NOT UNDERSTAND OR HAVE FURTHER QUESTIONS, PLEASE CONSULT WITH YOUR ATTORNEY.

THE PLAN CONTAINS A DEBTOR RELEASE AND A THIRD-PARTY RELEASE. A THIRD-PARTY RELEASE LIMITS OR RELEASES THE LIABILITY OF CERTAIN RELEASED PARTIES THAT ARE NON-DEBTOR PARTIES AND MAY PREVENT RELEASING PARTIES FROM SUING THE RELEASED PARTIES FOR THEIR ACTIONS. A THIRD-PARTY RELEASE MAY ONLY BE GRANTED CONSENSUALLY WITH EACH OF THE AFFECTED CREDITORS, BUT CONSENT MAY BE SHOWN BY A CREDITORS' FAILURE TO ACT.

YOU HAVE THE CHOICE AS TO WHETHER YOU WILL BE BOUND BY THE THIRD-PARTY RELEASE, AND THE CHOICE IS YOURS ALONE. YOU WILL BE A RELEASING PARTY AND YOUR RIGHTS MAY BE COMPROMISED UNLESS YOU TAKE CERTAIN ACTIONS. **IF YOU HOLD A CLAIM AGAINST THE DEBTORS AND WOULD LIKE TO OPT OUT OF THE THIRD-PARTY RELEASE, YOU MUST ELECT TO DO SO BY CHECKING THE OPT-OUT BOX CONTAINED IN ITEM 3 OF THIS BALLOT. YOU MUST ALSO VOTE TO REJECT THE PLAN OR ABSTAIN FROM VOTING. IF YOU VOTE TO ACCEPT THE PLAN, YOU WILL BE A RELEASING PARTY.** IF YOU DO NOT RECEIVE EITHER A BALLOT OR OPT OUT NOTICE FORM YOU MUST OBJECT TO THE THIRD-PARTY RELEASE OR YOU WILL BE A RELEASING PARTY. **OPTING OUT OF THE THIRD-PARTY RELEASE WILL NOT OTHERWISE MODIFY YOUR TREATMENT OR RECOVERY UNDER THE PLAN.**

THE RELEASED PARTIES ARE IDENTIFIED IN THE DEFINITION OF RELEASED PARTIES IN ARTICLE I OF THE PLAN. **THE RELEASED PARTIES INCLUDE, AMONG OTHERS, THE DEBTORS, THE CREDITORS COMMITTEE AND EACH OF ITS MEMBERS, THE**

INDIVIDUAL DEFENDANTS, THE STAFFING AGENCIES, THE CRO, AND THE DEBTORS' PROFESSIONALS.

PLEASE READ THE FULL TEXT OF THE CONSENSUAL THIRD-PARTY RELEASES AND RELATED DISCLOSURES IN ARTICLE IX.D OF THE PLAN, WHICH ARE SET FORTH HEREIN IN FULL IN ITEM 3, FOR FURTHER DETAIL REGARDING THE THIRD-PARTY RELEASE. ANY HOLDER OF CLAIMS THAT (I) VOTES IN FAVOR OF THE PLAN, (II) VOTES TO REJECT THE PLAN OR ABSTAINS FROM VOTING BUT FAILS TO ELECT TO OPT OUT OF THE THIRD-PARTY RELEASE ON HIS OR HER BALLOT OR OPT-OUT NOTICE FORM, OR (III) DOES NOT OBJECT TO THE THIRD-PARTY RELEASE IF SUCH HOLDER DID NOT RECEIVE A BALLOT OR OPT-OUT NOTICE FORM WILL BE DEEMED TO HAVE EXPRESSLY AND UNCONDITIONALLY RELEASED AND DISCHARGED THE RELEASED PARTIES PURSUANT TO THE THIRD-PARTY RELEASE SET FORTH IN ARTICLE IX.D OF THE PLAN.

PLEASE SUBMIT YOUR BALLOT BY ONE OF THE FOLLOWING TWO METHODS:

***Electronically, Via Ballot Portal*.**

- **Submit your Ballot via upload through the Claims and Noticing Agent's online portal, by visiting https://www.veritaglobal.net/wellmade (the "Ballot Portal") and following the instructions to submit your Ballot.**

- **You may also scan the QR code (hosted at https://www.veritaglobal.net/wellmade) below to access the E-Ballot Portal:**

- **In order to submit a Ballot through the E-Ballot Portal, you must use the Unique E-Ballot ID# assigned to your claim. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive.**

  UNIQUE E-BALLOT IDENTIFICATION: _____

  UNIQUE E-BALLOT PIN: _____

- **Each E-Ballot ID# is to be used solely for voting only those Claims described in Item 1 of your electronic Ballot. Please complete and submit an electronic Ballot for each E-Ballot ID# you receive, as applicable.**

- **Creditors who cast a Ballot using the E-Ballot Portal should NOT also submit a paper Ballot.**

- **The Claims and Noticing Agent's Ballot Portal is the sole manner in which Ballots will be accepted via electronic or online transmission. Ballots submitted by facsimile, email, or other means of electronic transmission will not be counted.**

OR

***Via Paper Ballot (if applicable)*.**

- **Complete, sign, and date this Ballot and return it (with an original signature) promptly via first-class mail (or in the enclosed reply envelope provided), overnight courier, or hand delivery to:**

By regular mail, overnight mail, or hand delivery at:

Wellmade Ballot Processing
c/o KCC d/b/a Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

Item 1. Amount of Claim.

The undersigned hereby certifies that as of the Voting Record Date, the undersigned was the Holder of a Class 3 Claim in the following aggregate unpaid amount:

$_____

Item 2. Vote on Plan.

The Holder of the Class 3 Claim against the Debtors, the aggregate amount of which is set forth in Item 1, votes to (please check one):

☐ **ACCEPT** (vote FOR) the Plan ☐ **REJECT** (vote AGAINST) the Plan

Your vote on the Plan will be tabulated on a consolidated basis.

Item 3. Third-Party Release Opt-Out Election.

AS A HOLDER OF CLAIMS AGAINST OR INTERESTS IN THE DEBTORS, YOU ARE A "RELEASING PARTY" UNDER THE PLAN AND ARE DEEMED TO PROVIDE THE THIRD-PARTY RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN, AS SET FORTH ABOVE. YOU MAY CHECK THE BOX BELOW TO ELECT NOT TO GRANT THE RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN. YOU WILL NOT BE CONSIDERED A "RELEASING PARTY" UNDER THE PLAN IF YOU CHECK THE BOX BELOW AND SUBMIT THE OPT OUT BY THE VOTING DEADLINE. YOU WILL RECEIVE THE SAME TREATMENT ON ACCOUNT OF YOUR CLAIM(S) UNDER THE PLAN

REGARDLESS OF WHETHER YOU ELECT TO NOT GRANT THE RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN.

IF YOU VOTE TO ACCEPT THE PLAN, YOU CANNOT OPT OUT OF PROVIDING THE THIRD-PARTY RELEASE AND YOU SHALL BE DEEMED TO HAVE CONSENTED TO THE THIRD-PARTY RELEASE REGARDLESS OF WHETHER YOU CHECK THE BOX BELOW. IF YOU (I) ABSTAIN FROM VOTING ON THE PLAN OR (II) VOTE TO REJECT THE PLAN AND, IN EITHER CASE, DO NOT CHECK THE BOX BELOW, YOU SHALL BE DEEMED TO HAVE CONSENTED TO THE THIRD-PARTY RELEASE. IF YOU ELECT TO OPT OUT OF THE THIRD-PARTY RELEASE, YOU CANNOT BE A "RELEASED PARTY" UNDER THE PLAN.

The Holder of the Claim identified in Item 4 elects to:

☐ **OPT OUT of the Third-Party Release**

Important information regarding releases under the Plan.[2]

Article IX.D of the Plan provides for a third-party release by the Releasing Parties (the "Third-Party Release"):

Notwithstanding anything contained in the Plan to the contrary, as of the Effective Date, and to the fullest extent allowed by applicable law, each Releasing Party[3] **is deemed to have forever released, waived, and discharged each of the Released Parties**[4] **from all Claims**

[2] The Plan provisions referenced herein are for summary purposes only and do not include all provisions of the Plan that may affect your rights. If there is any inconsistency between the provisions set forth herein and the Plan, the Plan governs. Please read the Plan carefully before completing this Opt Out Form. Defined terms used but not defined herein shall have the meaning ascribed to such term as in the Plan.

[3] "*Releasing Parties*" means the following Entities, each in their respective capacities as such: (a) each Holder of a Claim that (i) votes to accept the Plan or (ii) either (1) abstains from voting or (2) votes to reject the Plan and, in the case of either (1) or (2), does not opt out of the voluntary release by checking the opt-out box on the applicable Ballot, and returning it in accordance with the instructions set forth thereon, indicating that they are electing to opt out of granting the releases provided in the Plan; (b) each Holder of a Claim that is deemed to accept the Plan or is otherwise Unimpaired under the Plan and who does not opt out of the voluntary release by checking the opt out box on the applicable non-voting status notice form, and returning it in accordance with the instructions set forth thereon, indicating that they are not willing to grant the releases provided in the Plan; (c) each Holder of a Claim that is deemed to reject the Plan or is otherwise Impaired under the Plan and who does not opt out of the voluntary release by checking the opt-out box on the applicable non-voting status notice form, and returning it in accordance with the instructions set forth thereon, indicating that they are not willing to grant the releases provided in the Plan; and (d) each Holder of an unclassified Claim who does not object to the Third-Party Release.

[4] "*Released Parties*" means, each of the following, solely in its capacity as such: (a) the Debtors; (b) the Creditors Committee and each of its members (solely in their respective capacities as such); (c) the Individual Defendants; (d) the Staffing Agencies; (e) the CRO; AND (f) the Debtors' Professionals retained in these Cases.

and Causes of Action, whether known or unknown, including any derivative claims asserted or assertable on behalf of the Debtors or their respective Estates, that such Entity would have been legally entitled to assert (whether individually or collectively) based on or relating to, or in any manner arising from, in whole or in part, the Debtors (including the management, ownership, or operation thereof), any securities issued by the Debtors and the ownership thereof, the Debtors' in- or out-of-court restructuring efforts, any Avoidance Actions (but excluding Avoidance Actions brought as counterclaims or defenses to Claims asserted against the Debtors), any intercompany transaction, the DIP Loan Documents, Prepetition Loan Documents, the Cases, the formulation, preparation, dissemination, negotiation, or filing of the Disclosure Statement, the Plan, the Plan Supplement, solicitation of votes on the Plan, the prepetition negotiation and settlement of Claims, the pursuit of Confirmation, the pursuit of Consummation, the administration and implementation of the Plan, including the issuance or distribution of debt and/or securities pursuant to the Plan, or the distribution of property under the Plan or any other related agreement, or upon any other related act or omission, transaction, agreement, event, or other occurrence taking place on or before the Effective Date, except for Claims related to any act or omission that is determined in a Final Order by a court of competent jurisdiction to have constituted actual fraud, willful misconduct, knowing violation of law or gross negligence, but in all respects such Released Parties shall be entitled to reasonably rely upon the advice of counsel with respect to their duties and responsibilities pursuant to the Plan (the "Third-Party Release"); provided, however, the Third-Party Release does not release any post-Effective Date obligations of any party or Entity under the Plan, or any document, instrument, or agreement (including the Plan Documents and other documents, instruments, and agreements set forth in the Plan Supplement) executed to implement the Plan.

Notwithstanding anything to the contrary in the foregoing, any Holder of a Claim or Interest who did not (i) return an opt-out election form or (ii) file an objection to the Third-Party Release, that believes that its individual circumstances related to its ability to return a Ballot or opt-out election form opting out of the Third-Party Release or to object to the Third-Party Release are such that it should not be deemed to have consented to such Third-Party Release as a result of such failure, may seek relief from the Bankruptcy Court to exercise its rights and claims free of the Third-Party Release by rebutting the presumption that its failure to return an opt-out election form opting out of the Third-Party Release or to object to the Third-Party Release should be deemed to represent its consent to the Third-Party Release. Any party seeking such relief must, in any pleading regarding this provision filed with the Bankruptcy Court: (i) identify the claim(s) or types of claims the party wishes to pursue and (ii) identify the parties or the types of parties against such claims will be asserted.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Third-Party Release, which includes by reference each of the related provisions and definitions contained in the Plan, and, further, shall constitute the Bankruptcy Court's finding that the Third-Party Release is: (a) consensual; (b) essential to the confirmation of the Plan; (c) given in exchange for the good and valuable consideration provided by the Released Parties, including, without limitation, the Released Parties' contributions to facilitating the restructuring and implementing the Plan; (d) a good faith settlement and compromise of the Claims released by the Third-Party Release; (e) in

the best interests of the Debtors and their respective Estates; (f) fair, equitable, and reasonable; (g) given and made after due notice and opportunity for hearing; and (h) a bar to any of the Releasing Parties asserting any Claim or Cause of Action released pursuant to the Third-Party Release.

Article IX.F of the Plan establishes an Injunction (the "Injunction"):

Except as otherwise provided in the Plan or the Confirmation Order, all Entities who have held, hold, or may hold Claims, Interests, Causes of Action, or liabilities that: (a) are subject to compromise and settlement pursuant to the terms of the Plan; (b) have been released by the Debtors pursuant to the Plan; (c) are subject to exculpation pursuant to the Plan; or (d) are otherwise discharged, satisfied, stayed or terminated pursuant to the terms of the Plan, are permanently enjoined and precluded, from and after the Effective Date, from taking any of the following actions against, as applicable, the Debtors, the Plan Administrator, the Released Parties, or the Exculpated Parties: (1) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (2) enforcing, attaching, collecting, or recovering by any manner or means any judgment, award, decree, or order against such Entities on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (3) creating, perfecting, or enforcing any encumbrance of any kind against such Entities or the property or Estates of such Entities on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (4) asserting any right of setoff (other than setoffs exercised prior to the Petition Date) or subrogation of any kind against any debt, liability, or obligation due from such Entities or against the property of such Entities on account of or in connection with or with respect to any Claims, Causes of Action, or Interests; and (5) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action discharged, released, exculpated or settled pursuant to the Plan.

Any Entity injured by any willful violation of such injunction may seek actual damages and, in appropriate circumstances, may seek punitive damages from the willful violator.

Item 4. Certifications.

By signing this Ballot, the undersigned certifies to the Bankruptcy Court and the Debtors that:

(a) as of the Voting Record Date, either: the Entity is the Holder (or authorized signatory for a Holder) of the Claims in the Voting Class(es) as set forth in Item 1;

(b) the Entity (or in the case of an authorized signatory, the Holder) has reviewed a copy of the Disclosure Statement, the Plan, and the remainder of the Solicitation Package and acknowledges that the solicitation is being made pursuant to the terms and conditions set forth therein;

(c) the Entity has not relied on any statement made or other information received from any person with respect to the Plan other than the information contained in the Solicitation Package or other publicly available materials;

(d) no other Ballots with respect to the amount of the Claim identified in Item 1 has been cast or, if any other Ballots have been cast with respect to such Claim, then any such earlier Ballots are hereby revoked;

(e) the Entity understands and acknowledges that if multiple Ballots are submitted voting the Claim set forth in Item 1, only the last properly completed Ballot voting the Claim and received by the Claims and Noticing Agent before the Voting Deadline shall be deemed to reflect the voter's intent and thus to supersede and revoke any prior Ballots received by the Claims and Noticing Agent; and

(f) the Entity understands and acknowledges that all authority conferred or agreed to be conferred pursuant to this Ballot, and every obligation of the Holder hereunder, shall be binding upon the transferees, successors, assigns, heirs, executors, administrators, and legal representatives of the Holder and shall not be affected by, and shall survive, the death or incapacity of the Holder.

(Print or Type)

Name of Holder: _____

Signature: _____

Name of Signatory: _____
(If other than the Holder)

Title: _____

Address: _____

_____

_____

Telephone Number: _____

Email: _____

Date Completed: _____

IF THE CLAIMS AND NOTICING AGENT DOES NOT ACTUALLY RECEIVE THIS BALLOT ON OR BEFORE AUGUST 20, 2026, AT 4:00 P.M., PREVAILING EASTERN TIME, AND IF THE VOTING DEADLINE IS NOT EXTENDED, YOUR VOTE TRANSMITTED BY THIS BALLOT MAY BE COUNTED TOWARD CONFIRMATION OF THE PLAN ONLY IN THE DISCRETION OF THE DEBTORS.

INSTRUCTIONS FOR COMPLETING THIS BALLOT

1. The Debtors are soliciting the votes of Holders of Class 3 Claims with respect to the Plan referred to in the Disclosure Statement. **PLEASE READ THE PLAN AND DISCLOSURE STATEMENT CAREFULLY BEFORE COMPLETING THIS BALLOT.**

2. The Plan can be confirmed by the Bankruptcy Court and thereby made binding upon you if it is accepted by the Holders of at least two-thirds in amount and more than one-half in number of Claims or at least two-thirds in amount of Interests in at least one class that votes on the Plan and if the Plan otherwise satisfies the requirements for confirmation provided by section 1129(a) of the Bankruptcy Code. Please review the Disclosure Statement for more information.

3. To ensure that your Ballot is counted, you ***must*** complete and submit this Ballot as instructed herein. **Ballots will not be accepted by electronic mail or facsimile.**

4. **Use of Ballot.** To ensure that your Ballot is counted, you must: (a) complete your Ballot in accordance with these instructions; (b) clearly indicate your decision either to accept or reject the Plan in the boxes provided in Item 2 of the Ballot; and (c) clearly sign and submit your Ballot as instructed herein. For the avoidance of doubt, a Ballot submitted via the Claims and Noticing Agent's electronic Ballot Portal shall be deemed to contain an original signature.

5. Your Ballot must be returned to the Claims and Noticing Agent so as to be actually received by the Claims and Noticing Agent on or before the Voting Deadline. **The Voting Deadline is August 20, 2026, at 4:00 p.m. (prevailing Eastern Time)**.

6. If a Ballot is received after the Voting Deadline and if the Voting Deadline is not extended, it may be counted only in the sole and absolute discretion of the Debtors.

7. The method of delivery of Ballots to the Claims and Noticing Agent is at the election and risk of each Holder of Claim. Except as otherwise provided herein, such delivery will be deemed made only when the Claims and Noticing Agent ***actually receives*** the originally executed Ballot. In all cases, Holders should allow sufficient time to assure timely delivery.

8. If multiple Ballots are received from the same Holder Claim with respect to the same class prior to the Voting Deadline, the latest, timely received, and properly completed Ballot will supersede and revoke any earlier received Ballots.

9. You must vote all of your Claims within your respective class either to accept or reject the Plan and may ***not*** split your vote. A Ballot (or multiple Ballots with respect to multiple claims within a single class) that partially rejects and partially accepts the Plan will not be counted.

10. This Ballot does ***not*** constitute, and shall not be deemed to be, (a) a Proof of Claim or (b) an assertion or admission of a Claim.

11. **Please be sure to sign and date your Ballot**. If you are signing a Ballot in your capacity as a trustee, executor, administrator, guardian, attorney in fact, officer of a corporation, or otherwise acting in a fiduciary or representative capacity, you must indicate such capacity when signing and, if required or requested by the Claims and Noticing Agent, the Debtors, or the Bankruptcy Court, must submit proper evidence to the requesting party to so act on behalf of such Holder. In addition, please provide your name and mailing address if it is different from that set forth on the attached mailing label or if no such mailing label is attached to the Ballot.

PLEASE SUBMIT YOUR BALLOT PROMPTLY

IF YOU HAVE ANY QUESTIONS REGARDING THIS BALLOT, THESE VOTING INSTRUCTIONS, OR THE PROCEDURES FOR VOTING, PLEASE CALL THE RESTRUCTURING HOTLINE AT:

U.S. and Canada Toll Free: (866) 812-2297
International: (781) 575-4050

OR BY CLICKING THE "SUBMIT AN INQUIRY" OPTION AT HTTPS://WWW.VERITAGLOBAL.NET/WELLMADE/INQUIRY

IF THE CLAIMS AND NOTICING AGENT DOES NOT ACTUALLY RECEIVE THIS BALLOT ON OR BEFORE THE VOTING DEADLINE, WHICH IS AUGUST 20, 2026, AT 4:00 P.M., PREVAILING EASTERN TIME, AND IF THE VOTING DEADLINE IS NOT EXTENDED, YOUR VOTE TRANSMITTED HEREBY MAY BE COUNTED ONLY IN THE DISCRETION OF THE DEBTORS.

Scan the QR code below to view the Solicitation Procedures approved by the Court and the Combined Disclosure Statement and Plan (hosted at https://www.veritaglobal.net/wellmade)

EXHIBIT 2

Notice of Non-Voting Status for Unimpaired Classes and Opt Out Form

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)

NOTICE OF (A) NON-VOTING STATUS TO HOLDERS OF UNIMPAIRED CLAIMS OR INTERESTS CONCLUSIVELY PRESUMED TO ACCEPT THE PLAN AND (B) OPT OUT FORM REGARDING THIRD-PARTY RELEASES UNDER THE PLAN

PLEASE TAKE NOTICE THAT on June 1, 2026, the above-captioned debtors and debtors-in-possession (the "Debtors") filed the *Chapter 11 Plan* [Docket No. 385] (all exhibits thereto and as may be amended, supplemented, or otherwise modified from time to time, the "Plan") and the *Disclosure Statement for Debtors' Chapter 11 Plan* [Docket No. 386] (as may be amended, modified, or supplemented from time to time, the "Disclosure Statement")[2] with the United States Bankruptcy Court for the Northern District of Georgia (the "Court").

PLEASE TAKE FURTHER NOTICE THAT on [•], 2026, the Court entered an order [Docket No. •] (the "Solicitation Procedures Order") that, among other things, approved on an interim basis the Disclosure Statement as containing "adequate information" pursuant to section 1125(a) of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code").

PLEASE TAKE FURTHER NOTICE THAT because of the nature and treatment of your Claim or Interest under the Plan, ***you are not entitled to vote on the Plan***. Specifically, under the terms of the Plan, as a Holder of a Claim (as currently asserted against the Debtors) that is not Impaired and conclusively presumed to have accepted the Plan pursuant to Bankruptcy Code section 1126(f), you are ***not*** entitled to vote on the Plan.

PLEASE TAKE FURTHER NOTICE THAT the hearing at which the Court will consider final approval of the Disclosure Statement and Confirmation of the Plan (the "Combined Hearing") will commence on **August 27, 2026, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Sage M. Sigler in **Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**.

[1] The Debtors in these 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 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

[2] Capitalized terms not otherwise defined herein shall have the meanings attributed to such terms in the Plan or Disclosure Statement, as applicable.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Article V of the Plan, on the Effective Date, all Executory Contracts not assumed before the Effective Date or subject to a pending motion to assume as of the Effective Date will be deemed automatically rejected, and the Order confirming the Plan shall constitute an Order approving such rejection as of the Effective Date.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to approval of the Disclosure Statement or confirmation of the Plan is **August 20, 2026, at 4:00 p.m., prevailing Eastern Time** (the "Objection Deadline"). All objections to the relief sought at the Combined Hearing ***must***: (i) be made in writing; (ii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; (iii) state the name and address of the objecting party and the nature and amount of any claim or interest asserted by such party against the Debtors, their estates, or their property; (iv) state with particularity the legal and factual bases and nature of any objection to the Disclosure Statement or Plan; (v) be filed with the Court and served on: (a) counsel for the Debtors, Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (Elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com); (b) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, New York, New York 10017, Attn: Bradford J. Sandler (Bsandler@pszjlaw.com) and Cia Mackle (Cmackle@pszjlaw.com); and (c) the United States Trustee of the Northern District of Georgia, 362 Richard B. Russell Building, 75 Ted Turner Drive, S.W., Atlanta, GA 30303 Attn: Lindsay Kolba (Lindsay.P.Kolba@usdoj.gov) (collectively, the "Notice Parties").

PLEASE TAKE FURTHER NOTICE THAT if you would like to obtain a copy of the Disclosure Statement, Plan, the Plan Supplement, or related documents, you should contact Kurtzman Carson Consultants d/b/a Verita (the "Claims and Noticing Agent") by (a) writing via first class mail to Wellmade Ballot Processing, c/o Kurtzman Carson Consultants, LLC d/b/a Verita, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245 or (b) clicking the "Submit an Inquiry" option at https://www.veritaglobal.net/wellmade/inquiry, or (c) calling the Debtors' restructuring hotline at (866) 812-2297 (U.S./Canada) or (781) 575-4050 (International). You may also obtain copies of any pleadings filed in these Cases (a) for a fee via PACER at: http://www.ganb.uscourts.gov or (b) at no charge from the Claims and Noticing Agent by accessing the Debtors' restructuring website at https://www.veritaglobal.net/wellmade.

CAUTION - IF YOU DO NOTHING, YOUR RIGHTS MAY BE COMPROMISED. PLEASE PAY CAREFUL ATTENTION TO THE BELOW DISCLOSURE, AND IF YOU DO NOT UNDERSTAND OR HAVE FURTHER QUESTIONS, PLEASE CONSULT WITH YOUR ATTORNEY.

THE PLAN CONTAINS A THIRD-PARTY RELEASE. A THIRD-PARTY RELEASE LIMITS OR RELEASES THE LIABILITY OF CERTAIN RELEASED PARTIES THAT ARE NON-DEBTOR PARTIES AND MAY PREVENT RELEASING PARTIES FROM SUING THE RELEASED PARTIES FOR THEIR ACTIONS. A THIRD-PARTY RELEASE MAY ONLY BE GRANTED CONSENSUALLY WITH EACH OF THE AFFECTED CREDITORS, BUT CONSENT MAY BE SHOWN BY A CREDITORS' FAILURE TO ACT.

YOU HAVE THE CHOICE AS TO WHETHER YOU WILL BE BOUND BY THE THIRD-PARTY RELEASE, AND THE CHOICE IS YOURS ALONE. YOU WILL BE A RELEASING

PARTY AND YOUR RIGHTS MAY BE COMPROMISED UNLESS YOU TAKE CERTAIN ACTIONS. IF YOU WOULD LIKE TO OPT OUT OF THE THIRD-PARTY RELEASE, YOU MUST ELECT TO DO SO BY CHECKING THE OPT OUT BOX CONTAINED IN ITEM 1 OF THE ENCLOSED OPT OUT FORM. OPTING OUT OF THE THIRD-PARTY RELEASE WILL NOT OTHERWISE MODIFY YOUR TREATMENT OR RECOVERY UNDER THE PLAN.

THE RELEASED PARTIES ARE IDENTIFIED IN THE DEFINITION OF RELEASED PARTIES IN ARTICLE I OF THE PLAN. THE RELEASED PARTIES INCLUDE, AMONG OTHERS, THE DEBTORS, THE CREDITORS COMMITTEE, STAFFING AGENCIES, AND THE CURRENT DIRECTORS AND OFFICERS OF THE DEBTORS.

PLEASE READ THE FULL TEXT OF THE CONSENSUAL THIRD-PARTY RELEASES AND RELATED DISCLOSURES IN ARTICLE IX.D OF THE PLAN, WHICH ARE SET FORTH IN FULL IN ITEM 1 OF THE OPT OUT FORM, FOR FURTHER DETAIL REGARDING THE THIRD-PARTY RELEASE. IF YOU DO NOT ELECT TO OPT OUT OF THE THIRD-PARTY RELEASE ON THE OPT-OUT NOTICE FORM, YOU WILL BE DEEMED TO HAVE EXPRESSLY AND UNCONDITIONALLY RELEASED AND DISCHARGED THE RELEASED PARTIES PURSUANT TO THE THIRD-PARTY RELEASE SET FORTH IN ARTICLE IX.D OF THE PLAN.

Dated: [•], 2026

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
John D. Elrod, Ga. Bar No. 246604
Allison J. McGregor, Ga. Bar No. 860865
3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305
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Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

OPTIONAL: RELEASE OPT OUT FORM

You are receiving this optional opt out form (the "Opt Out Form") because you are or may be a Holder of a Claim or Interest that is not entitled to vote on the *Debtors' Chapter 11 Plan* [Docket No. •] (all exhibits thereto and as may be amended, supplemented, or otherwise modified from time to time, the "Plan").[1] Holders of Claims or Interests are deemed to grant the Third-Party Release set forth in the Plan unless a Holder affirmatively opts out by **August 20, 2026, at 4:00 p.m., prevailing Eastern Time** (the "Opt Out Deadline"). Holders of Claims or Interests may affirmatively opt out by, no later than the Opt Out Deadline, (a) submitting this form in accordance with the directions herein or (b) filing an objection to the Third-Party Release with the Court.

If you believe you are a Holder of a Claim or Interest with respect to the Debtors and choose to opt out of the Third-Party Release set forth in Article IX.D of the Plan, please either (a) promptly complete, sign, and date this Opt Out Form and return it via first class mail, overnight courier, or hand delivery to Kurtzman Carson Consultants LLC d/b/a Verita Global (the "Claims and Noticing Agent") at the address set forth below or (b) submit your Opt Out Form through the Claims and Noticing Agent's online Opt Out Portal in accordance with the directions provided below. Parties that submit their Opt Out Form using the Opt Out Portal should NOT also submit a paper Opt Out Form.

THIS OPT OUT FORM MUST BE ACTUALLY RECEIVED (WHETHER A PHYSICAL COPY IS RETURNED OR THE OPT OUT FORM IS COMPLETED ONLINE) BY THE CLAIMS AND NOTICING AGENT BY THE OPT OUT DEADLINE. IF THE OPT OUT FORM IS RECEIVED AFTER THE OPT OUT DEADLINE, IT WILL NOT BE COUNTED.

Item 1. Third-Party Release Opt-Out Election.

AS A HOLDER OF CLAIMS AGAINST OR INTERESTS IN THE DEBTORS, YOU ARE A "RELEASING PARTY" UNDER THE PLAN AND ARE DEEMED TO PROVIDE THE THIRD-PARTY RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN, AS SET FORTH ABOVE. YOU MAY CHECK THE BOX BELOW TO ELECT NOT TO GRANT THE RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN. YOU WILL NOT BE CONSIDERED A "RELEASING PARTY" UNDER THE PLAN IF YOU CHECK THE BOX BELOW AND SUBMIT THE OPT OUT BY THE VOTING DEADLINE. YOU WILL RECEIVE THE SAME TREATMENT ON ACCOUNT OF YOUR CLAIM(S) UNDER THE PLAN REGARDLESS OF WHETHER YOU ELECT TO NOT GRANT THE RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN.

YOU MAY ELECT TO OPT OUT OF THE RELEASE CONTAINED IN ARTICLE IX.D OF THE PLAN ONLY IF YOU CHECK THE BOX BELOW:

☐	**The Undersigned Holder of the Claim or Interest elects to OPT OUT of the Third-Party Release**

[1] Capitalized terms not otherwise defined herein shall have the meanings attributed to such terms in the Plan or Disclosure Statement, as applicable.

Important information regarding releases under the Plan.[2]

Article IX.D of the Plan provides for a third-party release by the Releasing Parties (the "Third-Party Release"):

Notwithstanding anything contained in the Plan to the contrary, as of the Effective Date, and to the fullest extent allowed by applicable law, each Releasing Party[3] is deemed to have forever released, waived, and discharged each of the Released Parties[4] from all Claims and Causes of Action, whether known or unknown, including any derivative claims asserted or assertable on behalf of the Debtors or their respective Estates, that such Entity would have been legally entitled to assert (whether individually or collectively) based on or relating to, or in any manner arising from, in whole or in part, the Debtors (including the management, ownership, or operation thereof), any securities issued by the Debtors and the ownership thereof, the Debtors' in- or out-of-court restructuring efforts, any Avoidance Actions (but excluding Avoidance Actions brought as counterclaims or defenses to Claims asserted against the Debtors), any intercompany transaction, the DIP Loan Documents, Prepetition Loan Documents, the Cases, the formulation, preparation, dissemination, negotiation, or filing of the Disclosure Statement, the Plan, the Plan Supplement, solicitation of votes on the Plan, the prepetition negotiation and settlement of Claims, the pursuit of Confirmation, the pursuit of Consummation, the administration and implementation of the Plan, including the issuance or distribution of debt and/or securities pursuant to the Plan, or the distribution of property under the Plan or any other related agreement, or upon any other related act or omission, transaction, agreement, event, or other occurrence taking place on or before the Effective Date, except for Claims related to any act or omission that is determined in a Final Order by a court of competent jurisdiction to have constituted actual fraud, willful misconduct, knowing violation of law or gross negligence, but in all respects such Released Parties shall be entitled to reasonably rely upon the advice of counsel with respect to their duties and responsibilities pursuant to the Plan (the "Third-Party Release"); provided, however, the Third-Party Release does not release any post-Effective Date obligations

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[2] The Plan provisions referenced herein are for summary purposes only and do not include all provisions of the Plan that may affect your rights. If there is any inconsistency between the provisions set forth herein and the Plan, the Plan governs. Please read the Plan carefully before completing this Opt Out Form. Defined terms used but not defined herein shall have the meaning ascribed to such term as in the Plan.

[3] "*Releasing Parties*" means the following Entities, each in their respective capacities as such: (a) each Holder of a Claim that (i) votes to accept the Plan or (ii) either (1) abstains from voting or (2) votes to reject the Plan and, in the case of either (1) or (2), does not opt out of the voluntary release by checking the opt-out box on the applicable Ballot, and returning it in accordance with the instructions set forth thereon, indicating that they are electing to opt out of granting the releases provided in the Plan; (b) each Holder of a Claim that is deemed to accept the Plan or is otherwise Unimpaired under the Plan and who does not opt out of the voluntary release by checking the opt out box on the applicable non-voting status notice form, and returning it in accordance with the instructions set forth thereon, indicating that they are not willing to grant the releases provided in the Plan; (c) each Holder of a Claim that is deemed to reject the Plan or is otherwise Impaired under the Plan and who does not opt out of the voluntary release by checking the opt-out box on the applicable non-voting status notice form, and returning it in accordance with the instructions set forth thereon, indicating that they are not willing to grant the releases provided in the Plan; and (d) each Holder of an unclassified Claim who does not object to the Third-Party Release.

[4] "*Released Parties*" means, each of the following, solely in its capacity as such: (a) the Debtors; (b) the Creditors Committee and each of its members (solely in their respective capacities as such); (c) the Individual Defendants; (d) the Staffing Agencies; (e) the CRO; AND (f) the Debtors' Professionals retained in these Cases.

of any party or Entity under the Plan, or any document, instrument, or agreement (including the Plan Documents and other documents, instruments, and agreements set forth in the Plan Supplement) executed to implement the Plan.

Notwithstanding anything to the contrary in the foregoing, any Holder of a Claim or Interest who did not (i) return an opt-out election form or (ii) file an objection to the Third-Party Release, that believes that its individual circumstances related to its ability to return a Ballot or opt-out election form opting out of the Third-Party Release or to object to the Third-Party Release are such that it should not be deemed to have consented to such Third-Party Release as a result of such failure, may seek relief from the Bankruptcy Court to exercise its rights and claims free of the Third-Party Release by rebutting the presumption that its failure to return an opt-out election form opting out of the Third-Party Release or to object to the Third-Party Release should be deemed to represent its consent to the Third-Party Release. Any party seeking such relief must, in any pleading regarding this provision filed with the Bankruptcy Court: (i) identify the claim(s) or types of claims the party wishes to pursue and (ii) identify the parties or the types of parties against such claims will be asserted.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Third-Party Release, which includes by reference each of the related provisions and definitions contained in the Plan, and, further, shall constitute the Bankruptcy Court's finding that the Third-Party Release is: (a) consensual; (b) essential to the confirmation of the Plan; (c) given in exchange for the good and valuable consideration provided by the Released Parties, including, without limitation, the Released Parties' contributions to facilitating the restructuring and implementing the Plan; (d) a good faith settlement and compromise of the Claims released by the Third-Party Release; (e) in the best interests of the Debtors and their respective Estates; (f) fair, equitable, and reasonable; (g) given and made after due notice and opportunity for hearing; and (h) a bar to any of the Releasing Parties asserting any Claim or Cause of Action released pursuant to the Third-Party Release.

Article IX.F of the Plan establishes an Injunction (the "Injunction"):

Except as otherwise provided in the Plan or the Confirmation Order, all Entities who have held, hold, or may hold Claims, Interests, Causes of Action, or liabilities that: (a) are subject to compromise and settlement pursuant to the terms of the Plan; (b) have been released by the Debtors pursuant to the Plan; (c) are subject to exculpation pursuant to the Plan; or (d) are otherwise discharged, satisfied, stayed or terminated pursuant to the terms of the Plan, are permanently enjoined and precluded, from and after the Effective Date, from taking any of the following actions against, as applicable, the Debtors, the Plan Administrator, the Released Parties, or the Exculpated Parties: (1) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (2) enforcing, attaching, collecting, or recovering by any manner or means any judgment, award, decree, or order against such Entities on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (3) creating, perfecting, or enforcing any encumbrance of any kind against such Entities or the property or Estates of such Entities on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action; (4) asserting any right of setoff (other than setoffs exercised prior to the Petition Date) or subrogation of any kind against any debt, liability, or obligation due from such Entities or against the property of such Entities on account of or in connection with or with

respect to any Claims, Causes of Action, or Interests; and (5) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such Claims, Interests, or Causes of Action discharged, released, exculpated or settled pursuant to the Plan.

Any Entity injured by any willful violation of such injunction may seek actual damages and, in appropriate circumstances, may seek punitive damages from the willful violator.

Item 2. Certifications.

By signing this Opt Out Form, the undersigned certifies to the Bankruptcy Court and the Debtors that:

(a) as of the Voting Record Date, either: the Person or Entity is the Holder (or authorized signatory for a Holder) of the Claims in the Voting Class(es) as set forth in Item 1;

(b) the Person or Entity (or in the case of an authorized signatory, the Holder) has reviewed a copy of the *Notice of (A) Non-Voting Status to Holders of Unimpaired Claims or Interests Conclusively Presumed to Accept the Plan and (B) Opt Out Form Regarding Third-Party Releases Contained in the Plan* and that this Opt Out Form is made pursuant to the terms and conditions set forth therein;

(c) the Person or Entity has submitted the same respective election concerning the releases with respect to all Claims or Interests in a single Class; and

(d) no other Opt Out Form has been submitted or, if any other Opt Out Forms have been submitted with respect to such Claims or Interests, then any such earlier Opt Out Forms are hereby revoked.

(Print or Type)

Name of Holder: _____

Signature: _____

Name of Signatory: _____
(If other than the Holder)

Title: _____

Address: _____

_____

_____

Telephone Number: _____

Email: _____

Date Completed: _____

IF YOU HAVE MADE THE OPTIONAL OPT OUT ELECTION, PLEASE COMPLETE, SIGN, AND DATE THIS OPT OUT FORM AND RETURN IT PROMPTLY BY ONLY ONE OF THE METHODS BELOW.

By regular mail, overnight mail, or hand delivery at:

Wellmade Ballot Processing
c/o KCC d/b/a Verita
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

OR

By electronic, online submission:

The Claims and Noticing Agent will accept Opt Out Forms if properly completed through the Opt Out Portal. To submit your Opt Out Form, please visit https://www.veritaglobal.net/wellmade (the "Opt Out Portal") and follow the instructions to submit your Opt Out Form.

You may also scan the QR code below to access the Opt Out Portal (https://www.veritaglobal.net/wellmade)

In order to submit your Opt Out Form through the Opt Out Portal, you must use the Unique Opt Out ID# assigned to your claim.

UNIQUE OPT OUT ID: _____

UNIQUE OPT OUT PIN: _____

The Claims and Noticing Agent's Opt Out Portal is the sole manner in which Opt Out Forms will be accepted via electronic or online transmission. Opt Out Forms submitted by facsimile, email, or other means of electronic transmission will not be counted.

Parties that submit their Opt Out Form using the Opt Out Portal should NOT also submit a paper Opt Out Form.

THE OPT OUT DEADLINE IS 4:00 P.M., PREVAILING EASTERN TIME ON AUGUST 20, 2026.

THE CLAIMS AND NOTICING AGENT MUST ACTUALLY RECEIVE YOUR OPT OUT ELECTION ON OR BEFORE THE OPT OUT DEADLINE. IF YOU HAVE ANY QUESTIONS REGARDING THIS OPT OUT FORM, PLEASE CONTACT THE RESTRUCTURING HOTLINE BY CALLING (866) 812-2297 (U.S./CANADA) OR (781) 575-4050 (INTERNATIONAL) OR BY CLICKING THE "SUBMIT AN INQUIRY" OPTION AT HTTPS://WWW.VERITAGLOBAL.NET/WELLMADE/INQUIRY FOR FURTHER ASSISTANCE.

EXHIBIT 3

Combined Hearing Notice

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re: WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*,[18] Debtors.	Chapter 11 Case No. 25-58764-SMS (Jointly Administered)

NOTICE OF (I) CONFIRMATION HEARING WITH RESPECT TO THE DEBTORS' CHAPTER 11 PLAN AND DISCLOSURE STATEMENT IN CONNECTION THEREWITH AND (II) RELATED OBJECTION DEADLINE

PLEASE TAKE NOTICE THAT on June 1, 2026, the above-captioned debtors and debtors-in-possession (the "Debtors") filed the *Debtors' Chapter 11 Plan* [Docket No. 385] (all exhibits thereto and as may be amended, supplemented, or otherwise modified from time to time, the "Plan") and the *Disclosure Statement for Debtors' Chapter 11 Plan* [Docket No. 386] (as may be amended, modified, or supplemented from time to time, the "Disclosure Statement")[19] with the United States Bankruptcy Court for the Northern District of Georgia (the "Court").

PLEASE TAKE FURTHER NOTICE THAT on [•], 2026, the Court entered an order [Docket No. •] (the "Solicitation Procedures Order") that, among other things, (a) approved on an interim basis the Disclosure Statement as containing "adequate information" pursuant to section 1125(a) of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code") subject to final approval at the Combined Hearing (defined below) and (b) authorized the Debtors to solicit acceptances for the Plan.

PLEASE TAKE FURTHER NOTICE THAT the hearing at which the Court will consider final approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing") will commence on **August 27, 2026, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Sage M. Sigler, in **Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303.** Parties must attend the Combined Hearing in person unless otherwise ordered by the Court. The Combined Hearing may be continued from time to time without further notice other than by announcement in open Court or a notice filed on the Court's docket and served on all parties entitled to the notice.

[18] The Debtors in these 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 cases is: 1 Wellmade Drive, Cartersville, GA 30121.

[19] Capitalized terms not otherwise defined herein shall have the meanings attributed to such terms in the Plan or Disclosure Statement, as applicable.

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing objections to the Plan and final approval of the Disclosure Statement is **August 20, 2026 at 4:00 p.m., prevailing Eastern Time** (the "Objection Deadline"). All objections to the relief sought at the Combined Hearing ***must***: (i) be made in writing; (ii) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; (iii) state the name and address of the objecting party and the nature and amount of any claim or interest asserted by such party against the Debtors, their estates, or their property; (iv) state with particularity the legal and factual bases and nature of any objection to the Disclosure Statement or Plan; (v) be filed with the Court and served on the following parties (the "Notice Parties") so as to be actually received on or before the Objection Deadline: (a) counsel for the Debtors, Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (Elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com); (b) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, New York, New York 10017, Attn: Bradford J. Sandler (Bsandler@pszjlaw.com) and Cia Mackle (Cmackle@pszjlaw.com); and (c) the United States Trustee of the Northern District of Georgia, 362 Richard B. Russell Building, 75 Ted Turner Drive, S.W., Atlanta, GA 30303 Attn: Lindsay Kolba (Lindsay.P.Kolba@usdoj.gov).

PLEASE TAKE FURTHER NOTICE THAT pursuant to Article V of the Plan, on the Effective Date, all Executory Contracts not assumed before the Effective Date or subject to a pending motion to assume as of the Effective Date will be deemed automatically rejected, and the Order confirming the Plan shall constitute an Order approving such rejection as of the Effective Date.

PLEASE TAKE FURTHER NOTICE THAT Article IX of the Plan contains certain releases, exculpations, and injunctions. These provisions affect your rights, including your rights against persons other than the Debtors. If you are a holder of a Claim against or Interest in the Debtors (other than a holder of a Claim or Interest that has either voted to accept the Plan), you may opt out from the Third-Party Release provisions by timely submitting a Ballot and checking the "Opt Out Box" contained therein or submitting the optional opt out election form attached to a Notice of Non-Voting Status. If you wish to opt out of the Third-Party Release provisions and have not received a Ballot or a Notice of Non-Voting Status, please contact Kurtzman Carson Consultants d/b/a Verita Global (the "Claims and Noticing Agent") immediately through the website or phone number provided below.

PLEASE TAKE FURTHER NOTICE THAT the Plan may be modified, if necessary, pursuant to section 1127 of the Bankruptcy Code, before, during, or as a result of the Combined Hearing, without further notice to interested parties.

PLEASE TAKE FURTHER NOTICE THAT additional copies of the Disclosure Statement, Plan, the Plan Supplement, and any solicitation materials (except for Ballots), are available free of charge on the Debtors' case information website (https://www.veritaglobal.net/wellmade) or may be obtained from the Claims and Noticing Agent by calling (866) 812-2297 (U.S./Canada) or (781) 575-4050 (International), or by clicking the "Submit an Inquiry" option at https://www.veritaglobal.net/wellmade/Inquiry. Please be advised that the Claims and Noticing Agent is authorized to answer questions about, and provide additional copies of, solicitation materials, but may not advise you as to whether you should vote to accept or reject the Plan.

If you have any questions regarding this Notice, please call (866) 812-2297 (U.S. and Canada Toll Free) or (781) 575-4050 (International) or visit https://www.veritaglobal.net/wellmade/inquiry.

Dated: [•], 2026

GREENBERG TRAURIG, LLP

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