UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re:	Chapter 11
WELLMAADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*,[1]	Case No. 25-58764-sms
Debtors.	(Jointly Administered)
	[Relates to Docket Nos. 387]

LIMITED OBJECTION AND RESERVATION OF RIGHTS OF THE COMMITTEE OF CREDITORS HOLDING UNSECURED CLAIMS TO CONDITIONAL APPROVAL OF DISCLOSURE STATEMENT

The Committee of Creditors Holding Unsecured Claims (the "Committee") of the above-captioned debtors and debtors in possession (the "Debtors"), by and through its undersigned counsel, hereby files this limited objection (this "Limited Objection") to Debtors request that the Court conditionally approve the Disclosure Statement and other associated relief. Doc. No. 387. In support of this Limited Objection, the Committee respectfully states as follows:

PRELIMINARY STATEMENT

1. Beginning at the end of May 2026, the Committee has been attempting to constructively resolve its open issues to Plan, including having a call at the end of June to discuss open issues and potential language resolution. On Sunday, July 12, 2026, the Debtors sent the Committee an amended draft that resolved only one issue, but left open several remaining issues. At this juncture, the Committee's issues with respect to the Plan are unresolved and therefore, the Committee is compelled to file this Limited Objection and Reservation of Rights.

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

BACKGROUND

2. On August 4, 2025 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Georgia (the "Court"), commencing the above-captioned cases (the "Chapter 11 Cases"). The Debtors are authorized to continue operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Cases.

3. After achieving a sale of substantially all of the Debtors' assets, on June 1, 2026, the Debtors filed their Chapter 11 Plan (the "Plan") and the associated Disclosure Statement, along with a request that the Court conditionally approve the Disclosure Statement, including a request to approve: 1) the procedure for solicitation and tabulation of votes to accept or reject the Plan, 2) the form of the ballot and solicitation materials, 3) the voting record date, 4) 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 5) related notice procedures and deadlines. [Doc. Nos. 385, 386 and 387].

LIMITED OBJECTION AND RESERVATION OF RIGHTS

4. The Plan purports to "unimpair" Class 4 General Unsecured Claims within the meaning of section 1124 of the Bankruptcy Code, which the Committee welcomes. However, the Plan treats these claims in these several ways that the Committee is investigating and reserves the right to determine if this constitutes true unimpairment within the meaning of the Bankruptcy Code:

a. First, the Plan provides that Class 4 General Unsecured Claims will receive interest at the ***lower*** of the Federal Judgment Rate or the Contract rate. In other words, the Debtors seek to override a contract's potentially higher rate of interest with the lower Federal Judgment Rate.

b. Second, the Plan states that Allowed Claims will receive payment "on the Effective Date" or "the date that such Claim becomes Allowed or as soon as reasonably practicable thereafter." *See* Doc. No. 385, Plan at Art. VIII.A. The Committee requests that there be an outside time date specified of not less than ten (10) days for payment of Allowed Claims.

c. Third, the Debtors propose to preserve avoidance action claims against the general unsecured claims although they are purportedly unimpaired.

[INTENTIONALLY LEFT BLANK]

CONCLUSION

5. The Committee's offer to discuss the above issues with the Debtors and their counsel still stands. The Committee files this Limited Objection and Reservation of Rights out of an abundance of caution. The Committee reserves its right to assert these and other objections to the final approval of Disclosure Statement and confirmation of the Plan, as may be necessary and appropriate, in compliance with further Orders of the Court.

Dated: July 14, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Shirley Cho
Signed w/express permission by Anna M. Humnicky
Bradford J. Sandler, Esq. (NY Bar No. 4499877)*
Shirley S. Cho, Esq. (CA Bar No. 192616)*
Maxim B. Litvak, Esq. (CA Bar No. 215852)*
Cia H. Mackle, Esq. (FL Bar No. 0026471)*
* *admitted pro hac vice*
1700 Broadway, 36th Floor
New York, NY 10019
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: bsandler@pszjlaw.com; scho@pszjlaw.com; mlitvak@pszjlaw.com; cmackle@pszjlaw.com

Counsel to the Committee of Creditors Holding Unsecured Claims

and

Small | Herrin, A Limited Liability Partnership

/s/ Anna M. Humnicky
Gus H. Small, Esq. (GA Bar No. 653200)
Anna M. Humnicky, Esq. (GA Bar No. 377850)
100 Galleria Parkway, Suite 350
Atlanta, GA 30339
Telephone: 770.783.1800
Email: gsmall@smallherrin.com
ahumnicky@smallherrin.com
Local Counsel to the Committee of Creditors Holding Unsecured Claims

UNITED STATES BANKRUPTCY COURT
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In re:	)	Chapter 11
WELLMAADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*,	)	Case No. 25-58764-sms
Debtors.	)	(Jointly Administered)
	)	**[Relates to Docket Nos. 387]**

CERTIFICATE OF SERVICE

I, Anna M. Humnicky, certify that I am over the age of 18 and on this date I filed and served copies of the foregoing **LIMITED OBJECTION AND RESERVATION OF RIGHTS OF THE COMMITTEE OF CREDITORS HOLDING UNSECURED CLAIMS TO CONDITIONAL APPROVAL OF DISCLOSURE STATEMENT** by using the Bankruptcy Court's Electronic Case Filing program which sends a notice of the above-listed document and an accompanying link to the document to the parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program, as indicated in Exhibit A.

This 14th day of July 2026.

SMALL HERRIN, LLP
Local Counsel to the Committee of Creditors Holding Unsecured Claims

By: /s/ Anna M, Humnicky
Anna M. Humnicky
Georgia Bar No.: 377850

100 Galleria Parkway
Suite 350
Atlanta, GA 30339
(P) 770-783-1800
ahumnicky@smallherrin.com

Exhibit A

Eric J. Breithaupt on behalf of Creditor Oracle America, Inc.
EBreithaupt@joneswalden.com, jwdistribution@joneswalden.com;eterrell@joneswalden.com

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

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

Arthur A. Ebbs on behalf of Creditor AFCO Credit Corporation
Arthur.Ebbs@wbd-us.com, Lynda.Daugherty@wbd-us.com

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

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

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

Will B. Geer on behalf of Creditor SummitBridge National Investments VIII, LLC
wgeer@rlkglaw.com,
dsideris@rlkglaw.com;willgeer@ecf.courtdrive.com;2836@notices.nextchapterbk.com;6717577420@filings.docketbird.com;lmassey@rlkglaw.com;cwilliams@rlkglaw.com;ecf_emails@rlkglaw.com

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

Aaron Michael Halegua on behalf of Creditor Eglis Almarza
ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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

Aaron Michael Halegua on behalf of Creditor Jiagen Yang
ah@aaronhalegua.com, 7457448420@filings.docketbird.com

Aaron Michael Halegua on behalf of Creditor Jiansheng Yin
ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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ah@aaronhalegua.com, 7457448420@filings.docketbird.com

Aaron Michael Halegua on behalf of Creditor Marianela Pina Yaguari
ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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

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ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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Aaron Michael Halegua on behalf of Creditor Yorman Ojeda
ah@aaronhalegua.com, 7457448420@filings.docketbird.com

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

Sameer Kapoor on behalf of Interested Party Lex 51 Bartow LLC
skapoor@phrd.com, elyttle@phrd.com

Lindsay P. S. Kolba on behalf of U.S. Trustee United States Trustee
lindsay.p.kolba@usdoj.gov

Cia H. Mackle on behalf of Creditor Committee Committee of Creditors Holding Unsecured Claims
cmackle@pszjlaw.com

Mark S. Marani on behalf of Creditor Flooring Investments LLC
mmarani@cpmtlaw.com, jpenston@cpmtlaw.com;ddouglas@cpmtlaw.com

Gary W. Marsh on behalf of Interested Party Chep USA, Inc.
gary.marsh@troutman.com, wlbank@troutman.com

Allison Jane McGregor on behalf of Debtor Wellmade Floor Coverings International, Inc.
allison.mcgregor@gtlaw.com, fieldss@gtlaw.com,allison--mcgregor-9094@ecf.pacerpro.com

Allison Jane McGregor on behalf of Debtor Wellmade Industries MFR. N.A LLC
allison.mcgregor@gtlaw.com, fieldss@gtlaw.com,allison--mcgregor-9094@ecf.pacerpro.com

Allison Jane McGregor on behalf of JointAdmin Debtor Wellmade Industries MFR. N.A LLC
allison.mcgregor@gtlaw.com, fieldss@gtlaw.com,allison--mcgregor-9094@ecf.pacerpro.com

Patrick James Reid on behalf of Creditor Anthony Davis
patrick@theworkersfirm.com

V. Severin Roberts on behalf of Creditor Anthony Davis
severin@theworkersfirm.com

Bradford J. Sandler on behalf of Creditor Committee Committee of Creditors Holding Unsecured Claims
bsandler@pszjlaw.com

A. Todd Sprinkle on behalf of Creditor PNC BANK, NATIONAL ASSOCIATION
toddsprinkle@parkerpoe.com, wandaclay@parkerpoe.com;courtneyvolz@parkerpoe.com

Charles H. Van Horn on behalf of Other Prof Ming Chen
cvanhorn@bfvlaw.com,
notices@bfvlaw.com;cgross@bfvlaw.com;ksilverman@bfvlaw.com;dpark@bfvlaw.com

Bruce Z. Walker on behalf of Creditor Flooring Investments LLC
bwalker@cpmtlaw.com, jpenston@cpmtlaw.com

David S. Weidenbaum on behalf of U.S. Trustee United States Trustee
david.s.weidenbaum@usdoj.gov

Daniel Werner on behalf of Creditor Can Gen Han
dwerner@radfordscott.com, dwerner@ecf.courtdrive.com

Daniel Werner on behalf of Creditor Eglis Almarza
dwerner@radfordscott.com, dwerner@ecf.courtdrive.com

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Elaine Woo on behalf of Creditor Can Gen Han
ewoo@radfordscott.com

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ewoo@radfordscott.com

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