Docket #0478 Date Filed: 08/11/2026

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Filed in U.S. Bankruptcy Court
Northern District of Georgia
Vania S. Allen, Clerk

AUG 10 2026

By: _____
Deputy Clerk

In re: WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., et al., Debtors.	Chapter 11 Case No. 25-58764-sms (Jointly Administered) **Re: Doc. No. 474**

CREDITOR HAITAO LI'S FIRST AMENDED RESPONSE IN OPPOSITION TO DEBTORS' MOTION TO RECONSIDER ORDER REGARDING HAITAO LI'S MOTION FOR LEAVE TO FILE LATE PROOFS OF CLAIM

Creditor Haitao Li ("Mr. Li"), appearing pro se, respectfully submits this Response in Opposition to *Debtors' Motion to Reconsider Order Regarding Haitao Li's Motion for Leave to File Late Proofs of Claim* [Doc. No. 474] (the "Debtors' Motion to Reconsider"), and respectfully requests that this Court deny Debtors' motion to vacate or alter its Order dated July 20, 2026 [Doc. No. 457] (the "Order"). In support thereof, Mr. Li shows as follows:

PRELIMINARY STATEMENT

1. Debtors' Motion to Reconsider [DOC. NO. 474] is nothing more than an improper attempt to relitigate issues fully heard, evaluated, and decided by this Court during the evidentiary hearing on July 16, 2026. Reconsideration under Fed. R. Civ. P. 59(e) (incorporated by Fed. R. Bankr. P. 9023) is an extraordinary remedy that requires showing a manifest error of law or fact, or newly discovered evidence that could not have been obtained prior to trial. Debtors have satisfied none of these standards.

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2. This Court correctly determined under the established Pioneer standard (Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. Partnership, 507 U.S. 380 (1993)) that Mr. Li's late filing was due to excusable neglect based on the severe combination of language barriers, subjective operational directives from plant management, and reliance on prior legal assistance. Debtors' post-trial reliance on an unconvincing declaration and mischaracterizations of procedural drafts fails to meet the stringent threshold for Rule 59(e) relief.

3. Crucially, in the absolute absence of any manifest error of law or fact, Debtors' motion constitutes an inefficient and bad-faith use of the estate's resources. This Motion serves no legitimate legal purpose and results in the unnecessary depletion of estate assets that should be strictly preserved for distribution to injured labor creditors.

4. By attempting to artificially generate procedural complexity out of finalized factual findings, Debtors' counsel imposes an undue administrative burden and severe procedural hardship upon an unrepresented claimant and trafficking survivor. Mr. Li has consistently acted in good faith to access this Court, and equity demands that this Court reject corporate counsel's tactical use of misleading post-trial filings designed to create a war of attrition against a vulnerable, pro se litigant.

5. Debtors fail to meet any applicable threshold under Rule 60(b): they demonstrate no excusable neglect under Rule 60(b)(1); their post-trial declaration fails the "reasonable diligence" test under Rule 60(b)(2) and is directly impeached by immutable bank records; they show no fraud or misconduct by Mr. Li under Rule 60(b)(3) while themselves submitting demonstrably false statements under penalty of perjury; and no extraordinary circumstances exist under Rule 60(b)(6) to rescue Debtors from their own strategic or tactical litigation choices.

CHRONOLOGY OF IMMUTABLE EVIDENCE REBUTTING DEBTORS' ASSERTIONS

To demonstrate Debtors' bad faith and the complete lack of credibility in the Declaration of Hong Lan Sun (Debtors' Exhibit B) [DOC. NO. 474], Mr. Li submits the following verified chronology of objective facts:

6. February 25, 2025 (Managerial Channel): Ms. Hong Lan Sun personally introduced Plant Manager Juemin Qian to the workforce within the core WeChat group, validating his managerial authority. (See WeChat Screenshot, Mr. Li's New Exhibit C).

7. March 12, 2025 (Management Mandate): Plant Manager Qian issued a text directive within the same WeChat group (including Ms. Sun) restricting QQ emails. (See WeChat Mandate, Mr. Li's New Exhibit C).

8. March 26, 2025 (FBI Intervention): **Well before the FBI** raided Debtors' facility due to trafficking allegations, Ms. Sun had already departed the United States for mainland China. Having fled/departed prior to the law enforcement action and the subsequent operational breakdown, Ms. Sun possessed zero firsthand knowledge of the factory's on-the-ground conditions, shift operations, or employment status during and after April and May 2025.

9. **May 30, 2025** (Proof of Employment): Debtors issued Mr. Li's final supervisor wage payment. **following his separation from the company on May 23, 2025. Official bank transfer records of this final payment establish continuous on-duty employment throughout May 2025, completely demolishing** Ms. Sun's perjured statement that his job ended on March 26. (See Bank Ledger, Mr. Li's New Exhibit D).

10. May 28, 2025 (Creditor's Diligence): Immediately upon vacating the empty dormitory, Mr. Li updated his residential address with his auto insurance provider. (Previously submitted as Mr. Li's Prior Exhibit A [DOC. NO. 442]).

11. October 2025 / Late January 2026 (Debtors' Constructive and Actual Knowledge of Vacated Residence): In October 2025, Debtors routed official Bar Date notices to a vacant dormitory (66 Seminole Rd). As the direct operators and managers of the company dormitory, Debtors possessed full, contemporaneous knowledge that Mr. Li had checked out and vacated the premises in strict compliance with company policy within 24 hours of his separation on May 23, 2025. Mailing official notices to a known empty property—while simultaneously possessing his W-2 contact information—constitutes a deliberate disregard for due process. Furthermore, by late January 2026, Debtors' counsel was formally informed of Mr. Li's specific identity and priority claim, yet Debtors took zero corrective measures to properly serve him.

12. March 10 - May 18, 2026 (Counsel's Identity Mix-up): Mr. Li was systematically misled because prior counsel confused his file with another claimant, which counsel subsequently admitted to in writing. (Previously submitted as Mr. Li's Prior Exhibit B [DOC. NO. 416]).

13. June 21, 2026 (Discovery of Notice Misrouting via Doc #419): Upon receiving Debtors' filing of the Estrada Declaration [DOC. NO. 419], Mr. Li realized for the first time the precise reason why he had never received the original Bar Date notice—namely, that Debtors had knowingly mailed it to the vacated dormitory, coupled with prior counsel's severe file confusion.

14. July 16, 2026 (Evidentiary Hearing): This Court conducted a trial, evaluated Mr. Li's credible testimony under oath, and rejected Debtors' objections.

15. July 20, 2026 (Order Granted Leave [DOC. NO. 457]): This Court entered its Order granting Mr. Li leave to file his late Proof of Claim under the excusable neglect standard.

16. August 3, 2026 (Motion to Reconsider [DOC. NO. 474]): Debtors submitted Debtors' Exhibit B (Ms. Sun's false declaration), which is completely refuted by the immutable bank and WeChat records established above.

LEGAL ARGUMENT

I. EXHIBIT B (DECLARATION OF HONG LAN SUN) CONTAINS DEMONSTRABLY FALSE STATEMENTS AND FAILS TO SATISFY RULE 59(e) OR RULE 60(b) STANDARDS

To prevail on a motion for reconsideration based on "newly discovered evidence" under Fed. R. Civ. P. 59(e), the moving party must demonstrate that the evidence was discovered post-trial and that the party exercised due diligence to discover it before trial. See Region 8 Forest Serv. Timber Purchasers Council v. Alcock, 993 F.2d 800, 806 (11th Cir. 1993). Debtors fail on all legal and factual prongs, as Ms. Hong Lan Sun's Declaration [DOC. NO. 474, Page 18] contains demonstrable falsehoods executed under penalty of perjury:

17. Ms. Sun is a long-standing insider and recruiter closely aligned with Debtors' management. Debtors possessed full operational knowledge of her identity and organizational role long before the July 16, 2026 evidentiary hearing. Debtors' strategic failure to call Ms. Sun as a witness or submit her declaration prior to or during the trial constitutes a tactical litigation oversight, which does not satisfy the legal threshold for Rule 59(e) relief.

18. In Paragraph 5 of her Declaration (Debtors' Exhibit B), Ms. Sun falsely swears under penalty of perjury that Mr. Li's employment at the Cartersville facility terminated on March 26, 2025. This statement is completely refuted by objective, third-party documentary

evidence. **Mr. Li's official bank direct deposit transfer records (Mr. Li's New Exhibit D) confirm that his final supervisor wage payment was issued on May 30, 2025, conclusively establishing that he remained actively employed through May.** Ms. Sun's willingness to submit a verified statement that is directly contradicted by immutable bank records severely destroys the credibility of her entire declaration.

19. Ms. Sun's broad assertion that management never issued an oral directive regarding QQ email use is a deliberate misrepresentation. **On February 25, 2025, Ms. Sun personally introduced Plant Manager Juemin Qian (Mr. Qian) to the entire workforce within the core corporate WeChat communications group (Mr. Li's New Exhibit C).** Not only was Ms. Sun an active participant in the exact same managerial channel where Plant Manager Qian subsequently issued operational reminders (such as the documented text directive on March 12, 2025), but she was the very insider who established and validated Plant Manager Qian's managerial authority to the workers. Having been a direct recipient of the same communications, Ms. Sun possessed actual knowledge of the plant's operational atmosphere. Her post-trial attempt to swear under 28 U.S.C. § 1746 that no such management directives existed represents a severe bad-faith attempt to mislead this Court.

20. Through independent diligence **on July 15, 2026,** Mr. Li located the definitive WeChat messaging screenshots confirming Plant Manager Qian's directives **originally issued on March 12, 2025.** Mr. Li successfully presented these screenshots to this Court during the July 16 hearing. Despite having nearly three weeks between the July 16 hearing and the filing of this Motion [DOC. NO. 474] on August 3, 2026, Debtors' counsel did not obtain any statement or declaration from Plant Manager Qian to refute these screenshots. Instead, Debtors submit a non-binding declaration from Ms. Sun, an individual residing in mainland China who **had already departed the United States prior to the March 26, 2025 federal law**

enforcement action. Because Ms. Sun was absent from the United States during the entirety of the relevant period in April and May 2025, her statements regarding Mr. Li's termination date lack foundational personal knowledge under Fed. R. Evid. 602. Debtors' reliance on the hearsay assertions of an absent recruiter who left before the raid, after failing to secure a rebuttal from the actual Plant Manager, confirms that Plant Manager Qian's directives stand as an unassailable fact on the record

II. MR. LI'S PRELIMINARY PAPERS [DOC. NO. 416] DO NOT CONSTITUTE A JUDICIAL ADMISSION AND DO NOT TRIGGER JUDICIAL ESTOPPEL

21. Debtors rely heavily on phrasing in the Omnibus Reply [DOC. NO. 416] to argue judicial estoppel. However, [DOC. NO. 416] was drafted in June 2026—well after Mr. Li's prior counsel, Attorney Aaron Halegua, had maliciously denied representation and abruptly abandoned his claim shortly before the anticipated settlement distribution.

22. The references to "awareness" within preliminary filings reflected Mr. Li's post-hoc general understanding gathered after he was abruptly abandoned by prior counsel on May 18, 2026, and subsequently sought assistance from human rights organizations to uncover the bankruptcy proceedings. As Mr. Li testified under oath at the July 16 evidentiary hearing, his initial contact with counsel was solely to recover unpaid wages, without any formal knowledge of the bankruptcy Bar Date. Drafting pro se pleadings in June 2026 using automated tools to make sense of a complex legal landscape does not constitute a judicial admission or a fraudulent shift in position, but rather a good-faith effort by a non-English-speaking litigant to navigate the court system after discovering the proceedings post-abandonment.

23. At the July 16 evidentiary hearing, Mr. Li testified directly under oath regarding his actual subjective timeline and receipt of notice. The Court had a full opportunity to assess Mr.

Li's credibility, cross examination by Debtors' counsel, and the underlying circumstances. Debtors cannot show that Mr. Li calculatedly changed positions to play "fast and loose" with the Court.

24. Even assuming arguendo that a non-lawyer worker heard general workplace shop-talk regarding the company's financial distress, such informal awareness does not constitute formal legal notice of the Bar Date or procedural instructions under the Bankruptcy Code. Federal jurisprudence has consistently established that a creditor's general knowledge that a debtor is in bankruptcy does not alleviate the debtor's constitutional obligation to provide actual, individualized, and proper notice of the specific claims bar date.

25. This vital legal distinction is critically magnified under the extraordinary circumstances of this case. As a non-English-speaking trafficking survivor with zero legal training, Mr. Li was systematically subjected to a severe structural informational vacuum. This vacuum was manufactured concurrently by the active omissions of Debtors—who, as the managers of the corporate housing, knew Mr. Li had vacated 66 Seminole Rd on May 23, 2025, yet still directed constitutional notices to that empty property in October 2025 despite possessing his actual address via his Form W-2—and the subsequent administrative misdirection of prior counsel, who completely confused his file until Mr. Li uncovered the misrouting via Doc. No. 419 on June 21, 2026. Under well-settled principles of equity, a vulnerable creditor cannot be penalized for procedural non-compliance when trapped within a total informational vacuum created by the joint failures of licensed legal professionals and corporate management.

III. THE ALLOWANCE OF MR. LI'S LAWFUL CLAIM IMPOSES NO UNFAIR PREJUDICE OR MANIFEST INJUSTICE

26. Debtors argue that Mr. Li's delayed submission caused unfair prejudice. However, as Debtors' counsel acknowledged on the record during the June 17, 2026 hearing (and previously established in **DOC. NO. 442, ¶ 10), Debtors possessed actual notice of Haitao Li's identity and potential presence as an affected worker as early as late January 2026 through a specific communication with prior counsel regarding worker populations, and Debtors were fully prepared and strategic in anticipation of this matter thereafter.**

27. **Under Pioneer, the primary inquiry regarding prejudice is whether late allowance impairs administration of the estate. Because Debtors already operated with such early notice and strategic preparation while overall settlement negotiations were still actively ongoing, allowing Claim Nos. 142 and 148 creates no operational surprise or legal prejudice to Debtors.**

28. Debtors' argument that they faced impossible administrative burdens to locate Mr. Li is entirely foreclosed by this Court's explicit factual findings. As noted on Page 5 of the Order [DOC. NO. 457], it is an uncontroverted and judicially recognized fact that "Wellmade mailed Mr. Li's 2025 Form W2 to Mr. Li's current address." This confirms that by late January 2026, Debtors actively possessed Mr. Li's updated, operational contact data. Debtors' current Motion fails to explain why they were perfectly capable of routing official federal tax documents to Mr. Li's actual residence to ensure corporate compliance, yet contemporaneously refused to provide him with proper service of the bankruptcy proceedings.

29. Debtors improperly introduce private WeChat communications in an attempt to paint Mr. Li's pursuit of his wages as bad-faith coercion. This characterization completely misstates the context of this Chapter 11 case, which arose directly from law enforcement interventions involving human trafficking and forced labor allegations. Mr. Li's statements regarding criminal recourse reflect a federal crime victim's lawful understanding of his statutory right to criminal

restitution and his intent to fully cooperate with federal law enforcement authorities and prosecutors. A trafficking survivor's declaration that he will seek criminal justice if his employer attempts to disenfranchise him through procedural exclusion is a lawful exercise of statutory rights, not civil malfeasance.

IV. THE BALANCE OF EQUITIES OVERWHELMINGLY FAVORS MR. LI'S DEMONSTRATED PROCEDURAL DILIGENCE

30. Under the Pioneer standard, the evaluation of equity requires assessing the creditor's subjective hurdles and affirmative efforts to access the Court.

31. While Debtors' counsel utilizes immediate electronic access to file pleadings via the court's ECF system, Mr. Li as an unrepresented technical professional without ECF access must comply with filing mandates by incurring documented out-of-pocket expenses for commercial printing, securing physical certified mailings, and utilizing unpaid leaves of absence from work (wage losses) to travel back and forth to transport files under extreme constraints. To argue that Mr. Li lacked diligence while ignoring these verified procedural, logistical, and financial sacrifices required for him to physically access this Court constitutes a material distortion of the record.

32. Despite possessing vast corporate resources and a three-week window prior to filing this Motion [DOC. NO. 474], Debtors have failed to produce a single piece of substantive, concrete rebuttal evidence—such as a verified declaration from the actual Plant Manager. Instead, Debtors rely on technical litigation maneuvers to exhaust a self-represented claimant. Equity under Bankruptcy Code § 105(a) demands that this Court reject this bad-faith litigation conduct and protect the finality of its prior Order.

V. DEBTORS' POST-TRIAL HYPOCRISY IGNORES A RECKLESS SYSTEM OF UNCONSCIONABLE CONTRACTS AND COERCIVE CONTROL

33. Debtors' attempt to present themselves as innocent procedural actors is completely belied by their documented operational history. Throughout his employment, Mr. Li and his fellow Chinese worker-plaintiffs were systematically subjected to an aggressive corporate regime of unconscionable contracts, un-negotiated adhesion agreements, and forced waivers designed to strip them of their fundamental statutory labor rights. Debtors' routine weaponization of language barriers to compel non-English speaking technicians to execute profoundly asymmetric agreements forms the very core of the human trafficking and labor exploitation allegations that triggered federal law enforcement intervention in March 2025.

34. It is highly alarming that even at the final, absolute conclusion of these Chapter 11 proceedings, Debtors remain fundamentally unrepentant. Rather than rectifying their past industrial wrongdoing, Debtors' counsel continues to aggressively deploy corporate resources to perpetuate this severe systemic disenfranchisement. Debtors' persistent attempt to deny a single workshop supervisor's valid, verified priority wage claim—through the calculated use of obsolete dormitory notice routing and false post-trial declarations—establishes that Debtors view this bankruptcy process not as a mechanism for honest financial reorganization, but as an ultimate procedural shield to escape their legal liabilities to the very workforce they exploited.

CONCLUSION AND RELIEF SOUGHT

For the reasons set forth above, Debtors have failed to demonstrate any manifest error of law or fact, or any newly discovered evidence satisfying the strict requirements of Fed. R. Civ. P. 59(e). While Debtors ask for "other and further relief," equity demands a fundamental question:

if this Court permits corporate entities to disenfranchise lawful priority wage claimants based on artificial procedural barriers and continuous technical litigation, who will provide substantive relief to the actual creditors of this estate? Furthermore, this Court should not tolerate post-trial declarations manufactured to subvert finalized factual findings. The filing of Ms. Sun's declaration directly contradicted by immutable banking and corporate communication records constitutes an impermissible abuse of the judicial process. Debtors' tactical reliance on vexatious technical filings serves only to deplete estate assets and delay administrative finality. Equity, constitutional due process, and judicial integrity demand that this Court stand by its sound legal findings, protect the record from bad-faith distortions, and issue appropriate sanctions under Bankruptcy Code § 105(a) against litigation conduct designed to exhaust a self-represented creditor.

WHEREFORE, Creditor Haitao Li respectfully requests this Court to:

1. DENY Debtors' Motion to Reconsider [DOC. NO. 474] in its entirety.
2. MAINTAIN in full force and effect the Court's Order dated July 20, 2026 [Doc. No. 457], deeming Claim Nos. 142 and 148 as timely filed and allowed claims.
3. Grant such other and further relief, including appropriate judicial admonishment or such other relief under the Court's inherent authority to prevent bad-faith litigation conduct, as this Court deems just and proper.

Dated: August 7, 2026

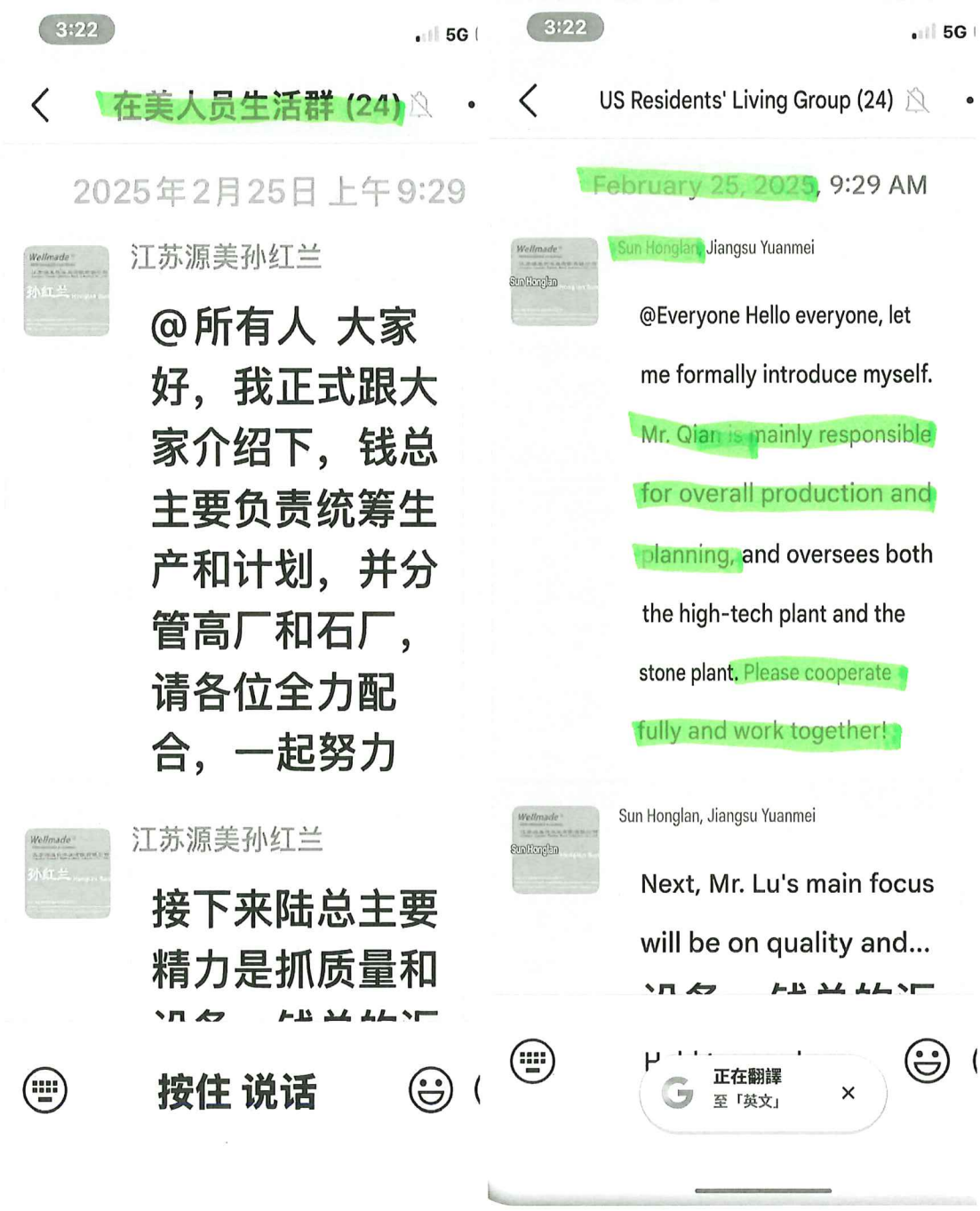
Respectfully submitted,

Hai Tao Li

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318 penn station way, Euharlee, GA 30120
(404) 831-1894
haitaol263@gmail.com

EXHIBIT C

Contemporaneous WeChat Screenshots


3:22
5G
在美人员生活群 (24)
2025年2月25日 上午9:29
江苏源美孙红兰
@所有人 大家好，我正式跟大家介绍下，钱总主要负责统筹生产和计划，并分管高厂和石厂，请各位全力配合，一起努力
江苏源美孙红兰
接下来陆总主要精力是抓质量和
按住 说话
3:22
5G
US Residents' Living Group (24)
February 25, 2025, 9:29 AM
Sun Honglan, Jiangsu Yuanmei
@Everyone Hello everyone, let me formally introduce myself. Mr. Qian is mainly responsible for overall production and planning, and oversees both the high-tech plant and the stone plant. Please cooperate fully and work together!
Sun Honglan, Jiangsu Yuanmei
Next, Mr. Lu's main focus will be on quality and...
正在翻譯
至「英文」

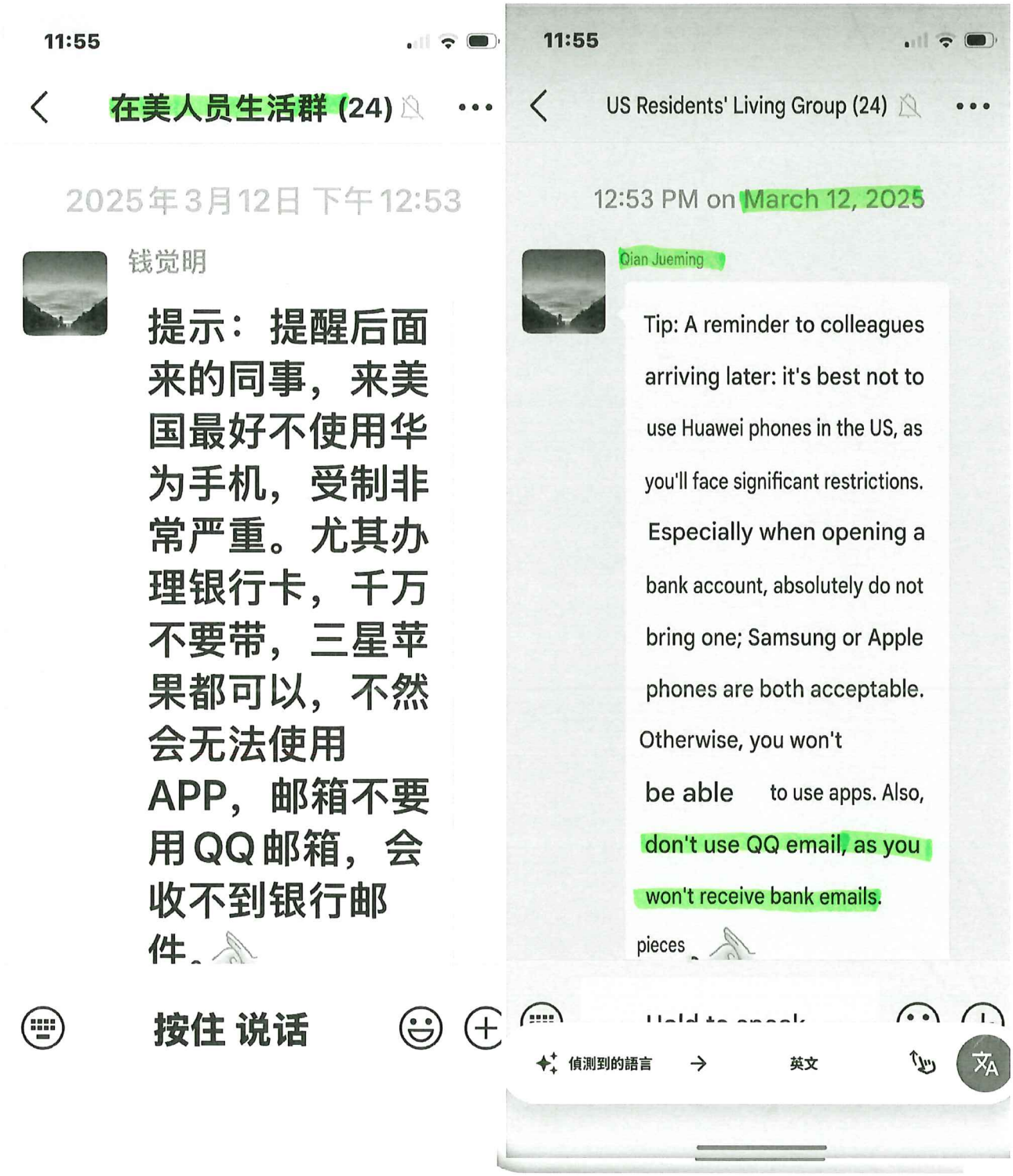

11:55
在美人员生活群 (24)
2025年3月12日 下午12:53
钱觉明
提示：提醒后面来的同事，来美国最好不使用华为手机，受制非常严重。尤其办理银行卡，千万不要带，三星苹果都可以，不然会无法使用APP，邮箱不要用QQ邮箱，会收不到银行邮件。
按住 说话
11:55
US Residents' Living Group (24)
12:53 PM on March 12, 2025
Qian Jueming
Tip: A reminder to colleagues arriving later: it's best not to use Huawei phones in the US, as you'll face significant restrictions. Especially when opening a bank account, absolutely do not bring one; Samsung or Apple phones are both acceptable. Otherwise, you won't be able to use apps. Also, don't use QQ email, as you won't receive bank emails.
pieces
偵測到的語言
英文

EXHIBIT D

Bank Salary Transfer Records

BANK OF AMERICA

P.O. Box 15284
Wilmington, DE 19850

HAITAO LI
1 WELLMADE DR
CARTERSVILLE, GA 30121-7208

Customer service information

Customer service: 1.800.432.1000
En Español: 1.800.688.6086
bankofamerica.com
Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Your Adv Plus Banking

for May 10, 2025 to June 9, 2025

Account number [redacted]6829

HAITAO LI

Account summary

Beginning balance on May 10, 2025	[redacted]
Deposits and other additions	[redacted]
ATM and debit card subtractions	[redacted]
Other subtractions	[redacted]
Checks	[redacted]
Service fees	[redacted]
Ending balance on June 9, 2025	[redacted]

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13:01
Adv Plus Banki...6829
Search transactions
Available balance
Conf# f898hkruq
May 30, 2025
PROPAY*Bartow Cou 05/28 PURCHASE Cartersville GA
May 30, 2025
135787 WELLMADE DES:DIR DEP ID:650 INDN:HAI TAO LI CO ID:XXXXX27403 PPD
May 28, 2025

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

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

DECLARATION OF CREDITOR HAITAO LI IN SUPPORT OF FIRST AMENDED RESPONSE IN OPPOSITION

I, Haitao Li, declare as follows:

1. I am the Creditor in this matter and submit this Declaration in support of my First Amended Response in Opposition.
2. I submit this Declaration to correct inadvertent clerical errors and typographical oversights contained in my original Response.
3. To provide the Court with a complete and accurate factual timeline, a new chronological event detailing the June 21, 2026 discovery of the misrouted notice via Doc. No. 419 has been added as Paragraph 13. Consequently, all subsequent paragraph numbers in this Amended Response have shifted forward by one compared to the original Response.
4. Paragraphs 9 and 18 (formerly 17) of the Response have been corrected to accurately clarify that Mr. Li remained actively employed through his separation on May 23, 2025, and received his final corporate wage payment on May 30, 2025, thereby confirming his active employment throughout May 2025. Furthermore, Paragraphs 8 and 20 (formerly 19) have been amended to reflect that Ms. Hong Lan Sun departed the United States prior to

March 26, 2025, establishing her lack of personal knowledge regarding factory operations in April and May 2025.

5. Due to an inadvertent oversight, Paragraph 19 of the original Response mistakenly stated that Plant Manager Qian's directives were issued on July 15, 2026. Paragraph 20 of this Amended Response has been corrected to clarify that Mr. Li located the screenshots on July 15, 2026, and that Plant Manager Qian's directives were originally issued on March 12, 2025.

6. Additionally, Paragraphs 11, 22, and 25 of the Amended Response (formerly Paragraphs 11, 21, and 24 of the original Response) have been updated to clarify that Debtors misrouted the Bar Date notice in October 2025 to 66 Seminole Rd despite knowing as dormitory managers that Mr. Li had vacated the premises on May 23, 2025. These paragraphs further clarify that Mr. Li first discovered the full extent of this notice misrouting upon receiving Debtors' Doc. No. 419 on June 21, 2026 (now explicitly detailed in the new Paragraph 13).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 7, 2026

Respectfully submitted,

Hai Tao Li

Haitao Li, Pro Se
318 penn station way, Euharlee, GA 30120
(404) 831-1894
haitaol263@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2026, a true and correct copy of the foregoing Creditor Haitao Li's First Amended Response in Opposition to Debtors' Motion to Reconsider Order Regarding Corporate/Haitao Li's Motion for Leave to File Late Proofs of Claim was served upon the following parties via the methods indicated below:

Clerk of Court, U.S. Bankruptcy Court: Northern District of Georgia, 75 Ted Turner Dr SW, Suite 1340, Atlanta, GA 30303 (Via United States Mail). Office of the United States Trustee: 75 Ted Turner Dr SW, Suite 362, Atlanta, GA 30303 (USTP.Region21@usdoj.gov; Atlanta.ExecutiveOffice@usdoj.gov) (Via Email). Counsel for Debtors: Greenberg Traurig, LLP Attn: John D. Elrod (Elrodj@gtlaw.com) (Via Email). Counsel for Official Committee of Unsecured Creditors: Pachulski Stang Ziehl & Jones LLP, Attn: Bradford J. Sandler (Bsandler@pszjlaw.com) & Cia Mackle (Cmackle@pszjlaw.com); Small Herrin, Attn: Anna M. Humnicky (ahumnicky@smallherrin.com) (Via Email)

Dated: August 7, 2026

Respectfully submitted,

Hai Tao Li

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Express

Extremely Urgent

CLERK OF COURT U.S. BANKRUPTCY
75 TED TURNER DR SW
STE 1340
ATLANTA GA 30303
P: 12
S: 1200
1231-1018
1: 31
1ZF23 39A0 1776 4 7807
SAT 08 AUG XLE SOP01-I: Aug 10 04:36:15 Pkg
US 3002 UPS 26.9 SATOLR

HAITAO LI
(404) 831-1894
318 PENN STATTION WAY
CARTERSVILLE GA 30120

0.3 LBS LTR
SHP WT: LTR
DATE: 07 AUG 2026

SHIP TO:
NORTHERN DISTRICT OF GA
CLERK OF COURT U.S. BANKRUPTCY COUR
STE 1340
75 TED TURNER DR SW
ATLANTA GA 30303-3329

GA 303 3-02

UPS NEXT DAY AIR
TRACKING #: 1Z F23 39A 01 7764 7807
1

BILLING: P/P

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MMRTEJSGRTJM9 1SH 13.00C 8DXOLON 3 20.6V 05/7

Received in U.S. Bankruptcy Court
Northern District of Georgia
Vania S. Allen, Clerk

AUG 10 2026

By: _____ Deputy Clerk