IN THE 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 (Jointly Administered) **Re: Dkt. Nos. 457, 474, 478**

DEBTORS' REPLY IN SUPPORT OF MOTION TO RECONSIDER ORDER REGARDING HAITAO LI'S MOTION FOR LEAVE TO FILE LATE PROOFS OF CLAIM

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through undersigned counsel, hereby submit this reply (the "Reply") in support of the *Debtors' Motion to Reconsider Order Regarding Haitao Li's Motion for Leave to File Late Proofs of Claim* [Docket No. 474] (the "Motion") and in response to the *First Amended Response in Opposition to Debtors' Motion to Reconsider Order Regarding Haitao Li's Motion for Leave to File Late Proofs of Claim* [Docket No. 478] (the "Amended Response") filed by Haitao Li ("Li"). In further support of the Motion, the Debtors respectfully state as follows:

INTRODUCTION

1. The Amended Response does not provide a meaningful objection to the Motion. Li presented material factual assertions and arguments at the July 16 evidentiary hearing that were not disclosed in his prior filings and that deprived the Debtors of a fair opportunity to respond.

[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.

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The Debtors seek reconsideration so that the record may be supplemented to provide the Court with evidence rebutting Li's late-disclosed assertions.

2. Li's opposition also fails to overcome his own prior admissions that he knew of these cases months before he sought allowance of his late-filed claims. The Debtors relied on those admissions in preparing for the evidentiary hearing. Those admissions, together with the Debtors' compliance with the Court-approved Bar Date Order and notice procedures, support reconsideration of the Order granting Li leave to file late claims.

3. For these reasons, and for the reasons set forth in the Motion, the Debtors respectfully request that the Court grant the Motion, deny Li's request for leave to file late proofs of claim, and disallow Claim Nos. 142 and 148 as untimely. Alternatively, the Debtors request that the Court reopen the evidentiary record to permit presentation of evidence relating to Li's late-disclosed assertions.

BACKGROUND

4. On August 3, 2026, the Debtors filed the Motion, seeking reconsideration of the Court's Order only to the extent the Order granted Li's motion for leave to file late proofs of claim and deemed Claim Nos. 142 and 148 timely filed.

5. In the Motion, the Debtors detail Li's new factual assertions at the July 16 evidentiary hearing, including the assertion that management allegedly directed him not to use his qq.com email address in the United States. These assertions were not previously disclosed in his prior written submissions.

6. With the Motion, the Debtors submitted the Declaration of Hong Lan Sun, which states, among other things, that Wellmade employees were not prohibited from using Chinese

email addresses such as qq.com and that such accounts operated normally in the United States for sending and receiving emails.

7. On August 7, 2026, Li filed his Response in Opposition to the Motion [Docket No. 476].

8. On August 10, 2026, Li filed the Amended Response and asked the Court to deny the Motion. The Amended Response does not cure the prejudice caused by Li's previously undisclosed factual assertions, nor does it negate the impact of Li's prior admissions regarding his knowledge of the bankruptcy cases.

REPLY ARGUMENT

9. The Amended Response should be disregarded because it does not address the procedural unfairness of Li's new assertions at the evidentiary hearing. Li did not disclose in his written submissions that any Debtor representative allegedly instructed him not to use his qq.com email address in the United States. Instead, that assertion first emerged during the evidentiary hearing (through an interpreter), leaving the Debtors without a meaningful opportunity to investigate, prepare responsive evidence, or rebut Li's new assertions.

10. The Debtors ask the Court to reconsider the portion of the Order granting relief to Li because the record on which that ruling was made was materially incomplete. At a minimum, the Debtors should be permitted to present evidence responsive to Li's late-disclosed assertions before the Court determines whether Claim Nos. 142 and 148 should be treated as timely.

11. The Amended Response also does not overcome the Debtors' evidence that qq.com email addresses were not prohibited and remained functional in the United States. Hong Lan Sun's declaration directly rebuts Li's explanation for failing to review the email address that he provided as part of his contact information and to which the Claim Package was sent.

A. Li's Late-Disclosed Assertions Support Reconsideration

12. Reconsideration is warranted where a party presents material assertions in a manner that prevents the opposing party from fairly responding. Here, Li's allegations regarding the qq.com email address were the primary basis for (a) his position that notice emailed to that address was ineffective under the circumstances and (b) the Court's ruling.

13. The Debtors could not reasonably have anticipated that Li would testify to an alleged prohibition on use of his qq.com email address when that assertion did not appear in his motion, reply, or amended reply. Because Li's assertion first appeared during testimony, the Debtors were prejudiced in their ability to present contrary factual evidence at the hearing.

14. The Sun Declaration is precisely the type of evidence the Debtors would have offered had Li timely disclosed his theory. The Court should consider that evidence now, or alternatively reopen the record for the limited purpose of addressing the issue raised for the first time during Li's testimony.

15. Li's Amended Response does not address this prejudice. Li primarily relies on the hearing record yet also submitted several wechat messages which were taken entirely out of context.

16. Attached hereto as Exhibit A is a Declaration of Juemin Qian which rebuts Li's improper attempt to spin the wechat messages. The Qian declaration establishes that the wechat messages were in the form of recommendations from a fellow Chinese expat, not requirements from Wellmade management.

17. Accordingly, the purported instruction from Wellmade management did not exist. Li could, and should, have checked the email address that he supplied to Wellmade management.

18. Based on this, the Debtors respectfully submit that the Court should reconsider the Order to prevent manifest injustice and to permit a decision based on a complete and accurate evidentiary record.

B. Li's Prior Admissions Regarding Knowledge of the Bankruptcy Cases Remain Dispositive

19. The Amended Response also fails to reconcile Li's prior statements that he knew of the Debtors' bankruptcy cases in January 2026. Those statements are deliberate factual assertions made in court filings and should be given effect in evaluating whether Li acted diligently and whether his delay was excusable.

20. While Li blames his judicial admissions on his use of "automated tools", the Court should not – and cannot – excuse his prior statements. The Debtors relied on those representations to the Court in preparing for the evidentiary hearing. The Debtors respectfully submit that it would be error for the Court to permit Li to retract those statements, particularly when the Debtors did not have notice of that retraction until Li was testifying.

21. Li did not file his motion for leave to file late proofs of claim until June 2026, months after his January 2026 awareness. That delay is inconsistent with a finding that Li acted diligently once he became aware of the need to protect any alleged claim against the Debtors. Accordingly, the Court should not permit the late claims.

C. The Court-Approved Notice Process Should Not Be Undermined

22. The Debtors complied with the Court-approved Bar Date Order and notice procedures, including service of the Claim Package by first-class mail and email. Li was served at the addresses reflected in the Debtors' records, including the qq.com address he provided as part of his contact information.

23. The Amended Response does not establish that the Debtors' approved noticing procedures were defective. Nor does it justify disregarding those procedures based on an assertion that Li failed to check an email account he had supplied and that the Debtors reasonably used for notice.

24. Allowing Li's claims notwithstanding the Debtors' compliance with the Court-approved Bar Date Order would prejudice the Debtors, legitimate creditors, and the administration of these Chapter 11 Cases. It would also diminish the certainty that bar dates are intended to provide in bankruptcy cases generally.

25. The Debtors respectfully submit that the Court should give effect to the approved notice process, Li's prior admissions, and the Debtors' rebuttal evidence, and should reconsider the portion of the Order granting Li relief.

D. Li Failed to Address Glaring Deficiencies in His Version of Events.

26. As noted in the Motion, Li asserts that an alleged direction from his former employer caused him not to check an email address where he was served with notice of the bar date many months after he left Wellmade's employment. This is simply not credible and does not excuse his failure to timely file a claim, particularly when he has repeatedly admitted knowledge of the bankruptcy in January 2026.

27. Li fails to address this issue in his Amended Response. His version of events is not logical and, even assuming it is true, shows that he was not diligent in reviewing bankruptcy notices. Accordingly, the Motion should be granted.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court grant the Motion, reconsider the Order solely to the extent it grants Li's motion for leave to file late proofs of claim and deems Claim Nos. 142 and 148 timely filed, deny Li's motion upon reconsideration, disallow

Claim Nos. 142 and 148 as untimely, and grant such other and further relief as the Court deems just and proper. In the alternative, the Debtors respectfully request that the Court reopen the evidentiary record for the limited purpose of permitting the Debtors to present evidence responsive to Li's late-disclosed factual assertions.

Dated: August 21, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

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

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2026, all ECF participants registered in this case were served electronically with the foregoing Reply 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 be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Reply, including on Li at the addresses provided in his filings.

Dated: August 21, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

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Counsel for the Debtors and Debtors in Possession

Exhibit A

Declaration of Jueming Qian

United States Bankruptcy Court

Northern District of Georgia

Atlanta Division

In re:	)	Chapter 11
WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., et al.,	)	Case No. 25-58764
Debtor.	)	

DECLARATION OF QIAN JUEMING

I, Jueming Qian, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare the following to the best of my knowledge, information, and belief:

1. I am an employee of WELLMADE FLOOR INDUSTRIES CO., LTD. in China. On February 21, 2025, I was dispatched to the Cartersville Factory in the United States under an L-1 visa status, initially serving as the Shift C Plant Director, with my primary responsibilities encompassing production coordination and planning.
2. During my work in the United States, my direct reporting lines were to

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Jianjun Lu and George Chen (陈竹).

3. I began serving as the Production Plant Manager in May 2025 and departed the Cartersville Factory in November 2025.

4. I know Haitao Li. Mr. Li arrived at the Cartersville Factory in the United States earlier than I did. Based on my understanding, he arrived at the Cartersville Factory in the United States in 2024, and he holds an L-1 visa status as a Technical Trainer.

5. Regarding Haitao Li’ s attendance and departure status at the Factory:

Based on my personal experience and understanding, Haitao Li’ s performance of duties and departure fluctuations at the Factory were as follows:

He failed to report to work to perform his duties (did not participate in the Factory's daily technical training and related work) from March 27, 2025, to April 13, 2025;

He subsequently returned to work on April 14, 2025, and ultimately formally resigned and departed at the end of May 2025.

Throughout his aforementioned changes in attendance status and final departure, he failed to make any formal reports or notifications in advance or afterward to me (or relevant management) in accordance with regulations (Exhibit A-attached hereto is relevant communication records, such as the email I sent to the Human Resources Department on May 27, 2025, regarding

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Haitao Li’ s departure).

6. Haitao Li stopped coming to the Factory after George Chen was arrested on March 26, 2025, did not return to the Factory until April 15, 2025, and departed at the end of May 2025. During both instances of leaving the Factory, he neither informed nor notified me beforehand or afterward, which demonstrates that he fails to report or notify regarding significant departure events .
7. Regarding the message I posted in the "Persons in the US Living Group" chat on March 12, 2025, at 12:53 PM U.S. time (March 13, 2025, at 12:53 AM China time), the original text of the message is:

"Tip: Remind colleagues coming later that it is best not to use Huawei phones in the United States, as the restrictions are very severe. Especially when applying for bank cards, do not bring them; Samsung or Apple are both fine, otherwise you will not be able to use the apps. Do not use QQ email for your email, as you will not receive bank emails. [Fist bump]"

Regarding the information I sent in the group chat concerning the selection of mobile phone brands and email addresses, I hereby provide the following factual clarification and explanation:

1) Nature and Membership of the Group Chat: The members of this group chat were all fellow Chinese compatriots. The vast majority of them had arrived in the United States earlier than I had, with only a few individuals

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about to travel to the United States.

2) True Intent of the Statement: This message was purely a sharing of life experience and a good-faith reminder provided to colleagues based on my own actual personal experience when applying for a bank card locally. Because I encountered some network adaptation issues when applying for a bank card at the time, I suggested that colleagues arriving subsequently could prioritize other device brands or email services to improve local living and operational efficiency. This was entirely an exchange of personal life experience and carried no mandatory nature whatsoever.

3) Purely Personal Daily Communication, No Approval Necessary: This information was neither a work instruction nor an administrative order, nor did it impose any mandatory requirements on anyone. Therefore, it does not fall within the scope of company business, nor did it require any prior reporting to, or application for approval from, Lu Jianjun or George Chen (陈竹).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: 8-7-2026

Place of Execution: Zhejiang. Jiaxing.

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Signature: Jue ming . Qian

Printed Name: Jueming Qian (钱觉明)

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Exhibit A

From: Die Ming Qian <JuemingQ@wellmademfr.com>

收件人: Waleska White<WaleskaW@wellmademfr.com>

Cc: John Bradford <JohnB@wellmadefloors.com>,Yolanda Escarcega<YolandaE@wellmademfr.com>, account01<account01@wellmadecorp.com>

Time: May 27, 2025 (Tuesday) 20:38

Size: 54 KB

Good morning:

According to Deng Bo's report, the training instructor Li Haitao also informed me that he has resigned and moved out of the dormitory. The HR department confirms whether formal resignation procedures have been completed.

Thank you,

Respectfully,
Jimmy Qian
Plant Manager
Wellmade Performance Flooring

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