Docket #0494 Date Filed: 08/24/2026

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)

DECLARATION OF ANDRES A. ESTRADA WITH RESPECT TO SOLICITATION AND THE TABULATION OF VOTES ON THE DEBTORS' CHAPTER 11 PLAN

I, Andres A. Estrada, depose and say under the penalty of perjury:

1. I am a Managing Director of Corporate Restructuring Services employed by Kurtzman Carson Consultants LLC d/b/a Verita Global ("Verita"), whose main business address is 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, California 90245.

2. I submit this declaration (the "Declaration") with respect to the solicitation of votes and the tabulation of ballots cast on the *Debtors' Chapter 11 Plan* [Docket No. 385] (the "Plan").[2] Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

3. The Bankruptcy Court authorized Verita's retention as claims, noticing, solicitation, and administrative agent to the Debtors on August 7, 2025 pursuant to the *Order Authorizing the*

[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.

[2] Terms not otherwise defined herein shall have the same meanings ascribed to them in the Solicitation Procedures Order.

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Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, Solicitation, and Administrative Agent Effective as of the Petition Date [Docket No. 29] (the "Retention Order"). The Retention Order authorized Verita to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

SERVICE AND TRANSMITTAL OF SOLICITATION PACKAGES AND THE TABULATION PROCESS

4. On July 22, 2026, the Bankruptcy Court entered the *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* [Docket No. 463] (the "Solicitation Procedures Order"), establishing procedures to solicit votes from and tabulate Ballots submitted by holders of claims entitled to vote on the Plan. Verita adhered to the procedures outlined in the Solicitation Procedures Order and I supervised the solicitation and tabulation performed by Verita's employees.

5. Pursuant to the Solicitation Procedures Order, Verita transmitted solicitation materials to those holders of claims entitled to vote on the Plan as of the July 6, 2026 Voting Record Date. Only holders of claims in Class 3 (Labor Plaintiff Claims) (the "Voting Class") were entitled to vote to accept or reject the Plan. In lieu of solicitation materials, all known holders of claims in Class 1 (Secured Claims), Class 2 (Other Priority Claims), Class 4 (General Unsecured Claims), and Class 5 (Interests) (collectively, the "Non-Voting Classes") received the Combined Hearing Notice and Notice of Non-Voting Status. Furthermore, Verita caused the Combined Hearing Notice to be

served on the creditor matrix. The Amended Disclosure Statement and Plan, Solicitation Procedures Order, and Combined Hearing Notice were made available on the public access website at www.veritaglobal.net/wellmade.

6. Verita worked closely with Debtors' counsel to identify the holders in the Voting Class entitled to vote on the Plan and to coordinate the distribution of solicitation materials to such holders. A detailed description of Verita's distribution of solicitation materials to holders entitled to vote on the Plan is set forth in the certificate of service, which was filed with the Bankruptcy Court of August 17, 2026 [Docket No. 482].

7. In accordance with the Solicitation Procedures Order, Verita received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's voting database, and processed. The deadline for Ballots to be received by Verita was August 20, 2026 at 4:00 p.m. (Eastern Time) (the "Voting Deadline").

8. Pursuant to the Solicitation Procedures Order, to be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures Order, (b) executed by the relevant holder entitled to vote on the Plan (or such holder's representative), (c) returned to Vertia via an approved method of delivery set forth in the Solicitation Procedures Order, and (d) received by the Voting Deadline.

9. Every validly cast Ballot was considered in the tabulation. The final tabulation of votes cast by timely and properly completed Ballots received by Verita is attached hereto as **Exhibit A**. The detailed Ballot report for the Voting Class is attached hereto as **Exhibit A-1**.

10. Verita also reviewed and documented elections recorded on the Ballots and Opt Out Forms from creditors in the Voting Class and Non-Voting Classes that checked the box on such

Ballot or Opt Out Form to opt out of the Third-Party Release. A Report of all holders of claims who opted out the releases is attached hereto as **Exhibit B**. For avoidance of doubt, this Declaration does not certify the validity or enforceability of any opt out elections received, including those reported on Exhibit B, but rather is providing these opt out election results for reporting and information purposes only.

Conclusion

To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: August 24, 2026

/s/ Andres A. Estrada
Andres A. Estrada
Verita
222 N Pacific Coast Highway, Suite 300
El Segundo, CA 90245
Tel 310.823.9000

Exhibit A

Exhibit A

Ballot Tabulation Summary

Class Name	Class Description	Unacceptable Votes	Members Voted	Members Accepted	Members Rejected	% Members Accepted	% Members Rejected	Total $ Voted	$ Accepted	$ Rejected	% $ Accepted	% $ Rejected
3	Labor Plaintiff Claims	0	1	1	0	100.00	0.00	$5,200,000.00	$5,200,000.00	$0.00	100.00	0.00

Exhibit A-1

Exhibit A-1
Class 3 Ballot Detail
Labor Plaintiff Claims

Date Filed	Ballot No.	Creditor Name	Voting Amount	Vote
08/08/2026	3	Labor Plaintiffs Settlement Agreement Claim	$5,200,000.00	Accept

Exhibit B

Exhibit B

Third-Party Release Opt-Out Election Detail

Date Filed	Ballot No. / Opt Out No.	Creditor Name	OPT Out of the Third-Party Release?
08/19/2026	8	AHF IC, LLC	Elects to OPT OUT of the Third-Party Release
08/19/2026	10	AHF, LLC	Elects to OPT OUT of the Third-Party Release
08/19/2026	9	AHF, LLC and AHF IC, LLC	Elects to OPT OUT of the Third-Party Release
08/18/2026	7	American Express	Elects to OPT OUT of the Third-Party Release
08/20/2026	13	Bo Deng	Elects to OPT OUT of the Third-Party Release
08/05/2026	2	CYBIR	Elects to OPT OUT of the Third-Party Release
08/11/2026	4	Flooring Investments LLC	Elects to OPT OUT of the Third-Party Release
08/20/2026	12	Gengxu Wang	Elects to OPT OUT of the Third-Party Release
08/03/2026	1	Haitao Li	Elects to OPT OUT of the Third-Party Release
08/17/2026	6	Oracle America, Inc., Successor in Interest in NetSuite, Inc. (Oracle)	Elects to OPT OUT of the Third-Party Release
08/20/2026	11	Richard Quinlan	Elects to OPT OUT of the Third-Party Release
08/13/2026	5	Thaw Zin Htwe (Tiffany Htwe)	Elects to OPT OUT of the Third-Party Release