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 Docket Nos. 385, 463, 464, 494, 496, 497**

DEBTORS' MOTION FOR ENTRY OF
AN ORDER ALLOWING REMOTE APPEARANCE OF WITNESSES

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through undersigned counsel, hereby move the Court (the "Motion") for entry of an Order, substantially in the form attached hereto as **Exhibit A**, to allow the remote appearance of the Debtors' witnesses at the hearing on final approval of the Disclosure Statement and confirmation of the Plan (the "Combined Hearing") currently scheduled for August 27, 2026 at 10:00 a.m. (EST). In further support of the Motion, the Debtors respectfully state as follows:

1. On June 1, 2026, the Debtors filed the *Debtors' Chapter 11 Plan* [Docket No. 385] (together with 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]. On July 22, 2026, the Debtors filed the *Amended Disclosure Statement for Debtors' Chapter 11 Plan* [Docket No. 464] (as may be further amended, modified, or supplemented from time to time, the "Disclosure Statement").

[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. 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 Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures and Deadlines* [Docket No. 463] (the "Solicitation Procedures Order"), setting the date for the Combined Hearing and approving, among other things: (a) the proposed procedures for solicitation of the Plan; (b) related notices, forms, and ballots; and (c) the form and notice of the Combined Hearing.

3. On August 24, 2026, in accordance with the Solicitations Procedures Order and in further support of confirmation of the Plan, the Debtors filed (i) the *Declaration of Andres A. Estrada with Respect to Solicitation and the Tabulation of Votes on the Debtors' Chapter 11 Plan* [Docket No. 494] (the "Voting Declaration"); (ii) the *Declaration of David Baker in Support of Confirmation of the Debtors' Chapter 11 Plan* [Docket No. 496] (the "Baker Declaration"); and (iii) the *Debtors' Memorandum of Law in Support of Final Approval of the Disclosure Statement and Confirmation of the Debtors' Chapter 11 Plan* [Docket No. 497] (the "Confirmation Brief").

4. At the Combined Hearing, in support of confirmation of the Plan, the Debtors may rely on the Voting Declaration and Baker Declaration as exhibits and on the declarants Andres A. Estrada ("Estrada") and David Baker ("Baker") as potential witnesses. The Debtors believe that Estrada's and Baker's testimony will only be needed if a party seeks to cross-examine Estrada or Baker on the statements made in the Voting Declaration or the Baker Declaration, respectively.

5. Should Estrada or Baker be called to testify as a witness at the Combined Hearing, the Debtors respectfully request that Estrada and Baker be permitted to appear remotely at the Combined Hearing.

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that this Court: (i) enter the proposed order attached hereto as **Exhibit A,** allowing Estrada and Baker to appear remotely at the Combined Hearing, including any continued or reset hearing, on final approval of the Disclosure Statement and confirmation of the Plan; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: August 25, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 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 be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Motion.

Dated: August 25, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

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Exhibit A

(Proposed Order)

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 Docket No. __**

[PROPOSED ORDER]

UPON CONSIDERATION of the foregoing *Motion for Entry of an Order Allowing Remote Appearance of Witnesses* [Docket No. __] (the "Motion")[2] filed by the above-captioned debtors

[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] Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

and debtors in possession (collectively, the "Debtors"), and for good cause shown, **IT IS HEREBY ORDERED** that:

1. The Motion is **GRANTED**;

2. **IT IS FURTHER ORDERED** that any witness that the Debtors intend to call to testify at the Combined Hearing (or any continued or reset hearing) on final approval of the Disclosure Statement and confirmation of the Plan, including witnesses Andres A. Estrada and David Baker, may appear via the Court's Virtual Hearing Room. Parties may join the Virtual Hearing Room through the "Dial-In and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Additional information about the hearing can be found on the "Hearing Information" tab on the judge's webpage. All other parties that intend to present evidence or testimony at the Combined Hearing must attend the Combined Hearing in person unless otherwise ordered by the Court.

END OF ORDER

Prepared and presented by:

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