Docket #0511 Date Filed: 08/27/2026

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U.S. BANKRUPTCY COURT
NORTHERN DISTRICT
OF GEORGIA

2026 AUG 27 P 12:51

VANESSA G. ALLEN
BY: M White
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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) **Re: Doc. No. 474 & 491**

CREDITOR HAITAO LI'S SUR-REPLY AND SUPPLEMENTAL DECLARATION IN OPPOSITION TO DEBTORS' REPLY BRIEF [DOC. NO. 491]

I, Haitao Li, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, submit this Supplemental Declaration to address the material admissions and alarming revelations contained within the Debtors' Reply [Doc. No. 491] and Exhibit A attached thereto:

I. Debtors' Own Exhibit A (Page 16) Conclusively Establishes Actual Knowledge of Vacated Residence, Confirming Fraudulent Service

1. The Debtors argue in Doc. No. 491 that they properly served me in October 2025 by mailing the Bar Date Notice to the company dormitory at 66 Seminole Rd. However, the Debtors' own evidence completely destroys this argument and exposes their service as fraudulent.

2. According to the Debtors' own Exhibit A (Page 16 of Doc. No. 491), an internal corporate email sent by Jueming Qian to Human Resources on May 27, 2025, explicitly states: "According to Deng Bo's report, the training instructor Li Haitao also informed me that he has resigned and moved out of the dormitory.

3. This contemporaneous email—manufactured and submitted to this Court by the Debtors themselves—proves beyond any doubt that as of May 27, 2025, the Debtors' management and HR department possessed actual, written, and definitive knowledge that I no longer resided at the dormitory.

2558764260827000000000003

4. Despite knowing with absolute operational certainty that the dormitory room was entirely vacant, and despite possessing my updated residential address via Form W-2 for tax compliance, the Debtors deliberately routed constitutional legal notices to that empty property in October 2025.

5. Serving essential bankruptcy notices to a shuttered corporate housing unit while knowing the intended recipient had permanently vacated constitutes a textbook violation of Constitutional Due Process and an outright fraud upon this Court.

II. The Disturbing Corporate Culture of Coercive Control Exposed by the "Li Haitao Resignation" Mandate

6. Crucially, the Court's attention must be directed to the internal corporate categorization of the Debtors' May 27, 2025 email on Page 16 of Doc. No. 491. While the formal subject line is titled "Li Haitao Resignation," this routine personnel notice was explicitly filed and tagged under the company's internal management category designated as: "Death Penalty.

7. The systemic categorization of a technician's regular resignation under a administrative label as severe as "Death Penalty" exposes the aggressive corporate regime of unconscionable coercion, fear, and systemic intimidation that the Chinese workforce was subjected to.

8. This contemporaneous record heavily validates the human trafficking and labor exploitation allegations on the record. For the Debtors' counsel to argue that a worker trapped in a corporate system where an exit notice is back-end tagged as a "Death Penalty" event should treat a top manager's WeChat warning as a "lighthearted personal suggestion" is profoundly offensive and legally meritless.

III. Rebuttal of Jueming Qian's Perjured Characterization of the Official Corporate Channel

9. In his declaration, Jueming Qian attempts to re-characterize his March 12, 2025 directive restricting QQ email use as a "purely personal daily communication" and a "good-faith reminder among expats." This is a blatant misrepresentation designed to evade perjury charges.

10. As documented in Mr. Li's prior filings, this exact WeChat group was the centralized platform utilized by corporate insiders to issue mandatory staff meeting orders in the "Large Conference

Room," dictate automatic salary deductions for utility fees, and distribute formal corporate "Promotion Notices" carrying 5% wage increases.

11. Because corporate management utilized this specific channel as their primary administrative vehicle to enforce employment ranks and control payroll, Mr. Qian's directive warning workers that QQ mail was technologically restricted in the U.S. carried the full administrative authority of management. My reliance on his command to delete the QQ application was fully justified.

IV. Clarification of Timeline and Commitment to Justice

12. The Debtors continue to aggressively exploit a technical drafting error in my initial June 2026 pro se motion regarding "January awareness." I re-state under penalty of perjury that in January 2026, I had zero formal knowledge of this bankruptcy proceeding. I retained prior counsel solely to pursue an independent wage claim, and was repeatedly misled that "everything was fine" until I was abandoned on May 18, 2026.

13. The minor delay between late May 2026 and my pro se filing in June 2026 represents absolute diligence under an extraordinary information vacuum manufactured jointly by prior counsel and the Debtors' defective service.

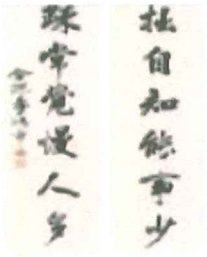
WHEREFORE, Creditor Haitao Li respectfully requests this Court to DENY the Debtors' Motion to Reconsider [DOC. NO. 474] in its entirety, reject the unrepentant and contradictory declarations of the Debtors' insiders, and maintain the finality of the Court's prior Order allowing Claim Nos. 142 and 148 [Doc. No. 457].I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 24, 2026

Respectfully submitted,

Hai Tao Li

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



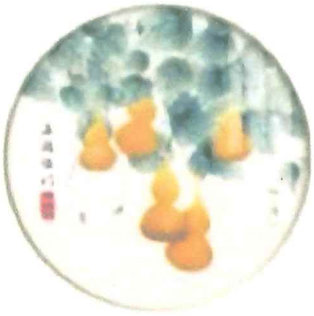
Georg...



Morgan



江苏源...



石红星



美国高...



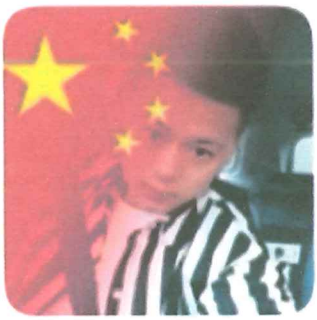
Georg...



陆建军



美国工...



邓波



张静

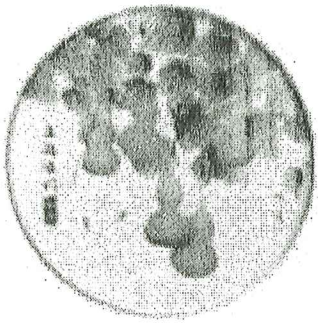


美国张...



韩参根

Georg...



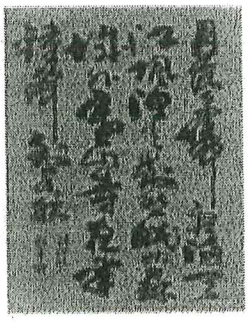
石红星

Morgan

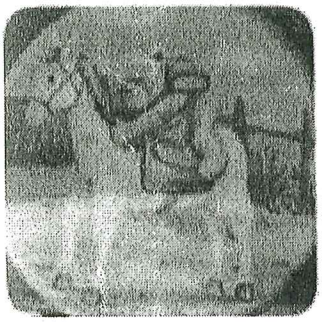


美国高...

江苏源...



Georg...



陆建军



美国工...



邓波



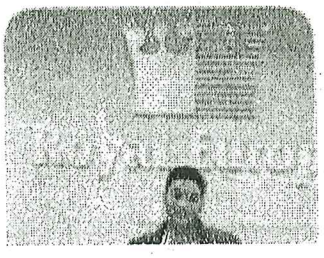
张静



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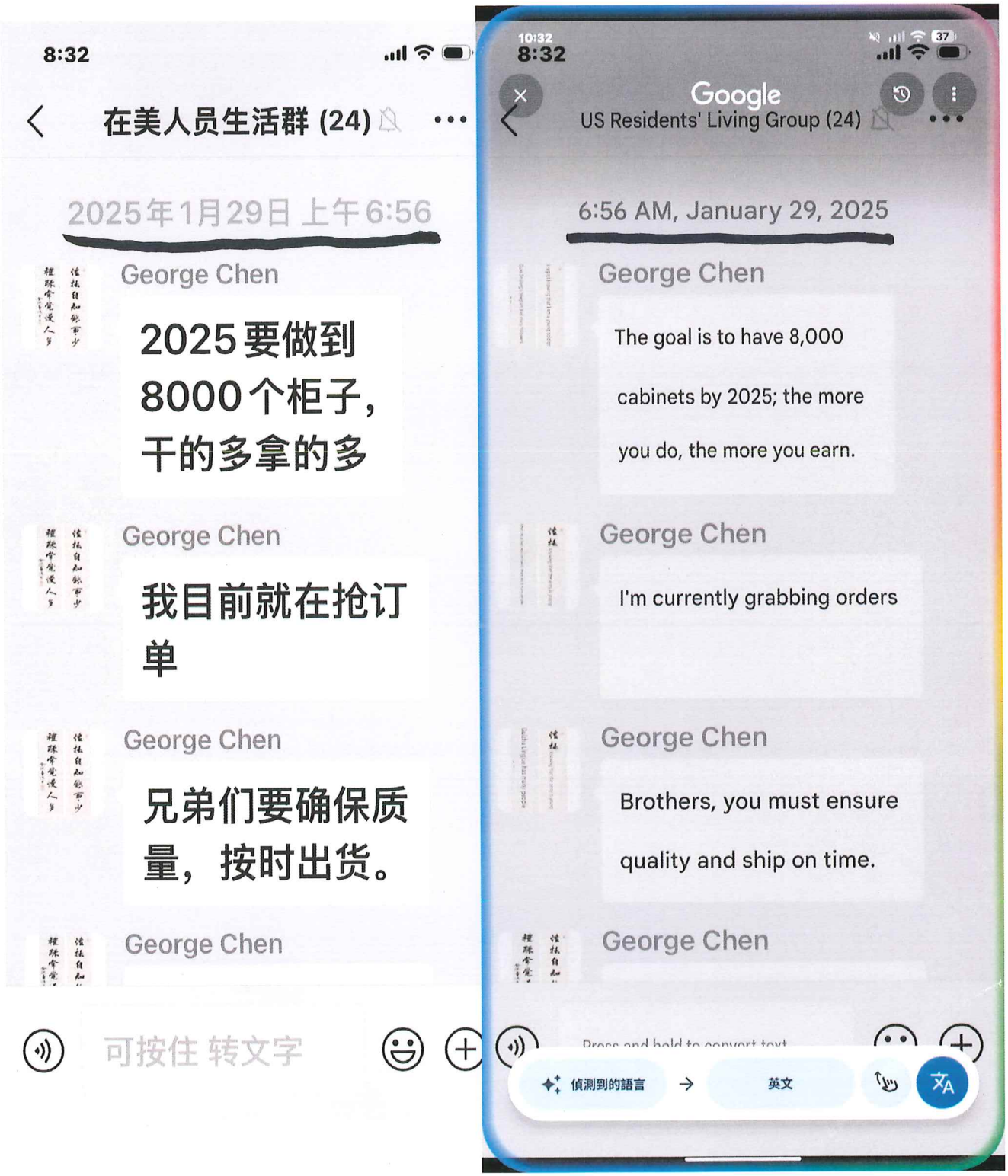


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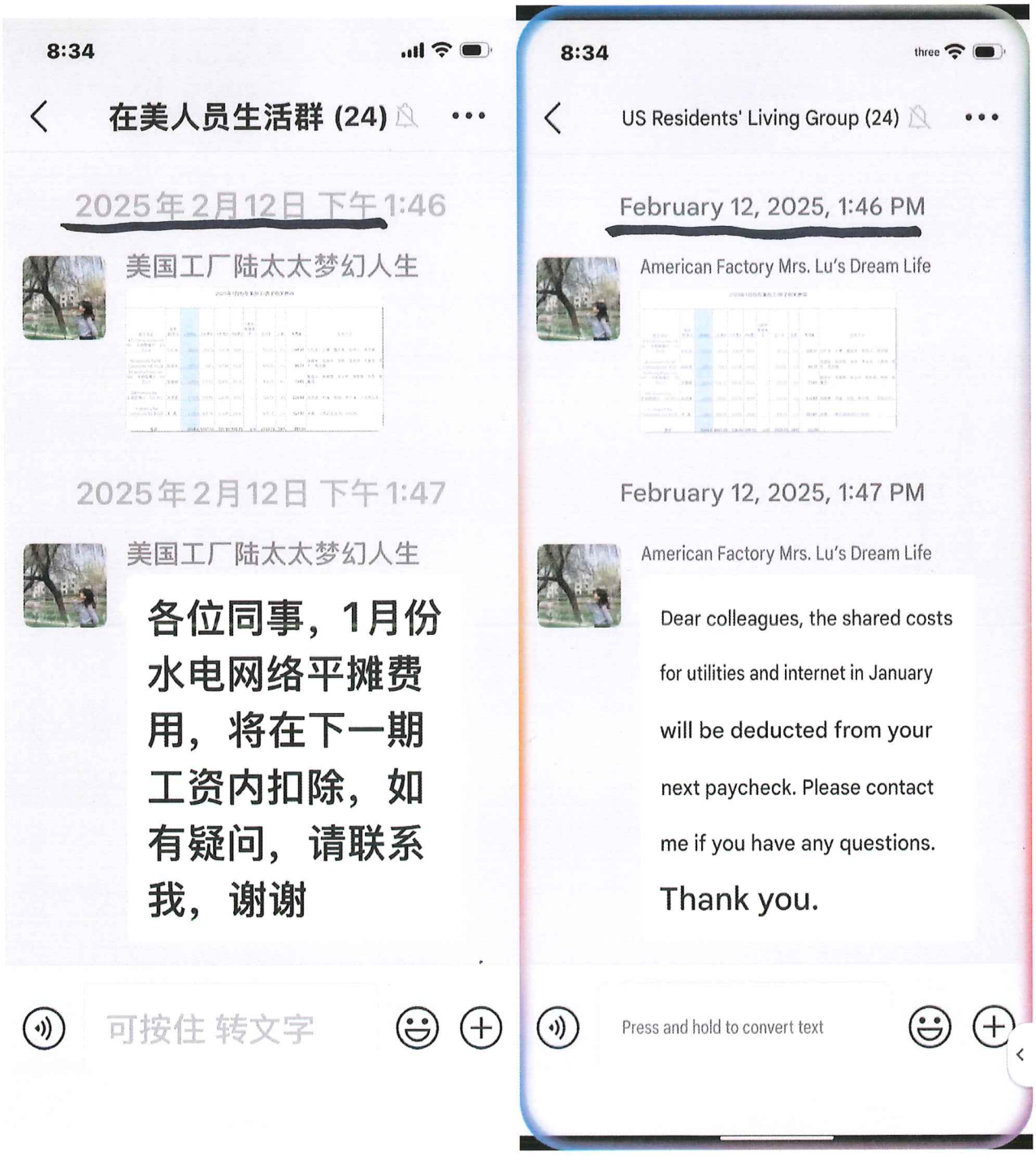


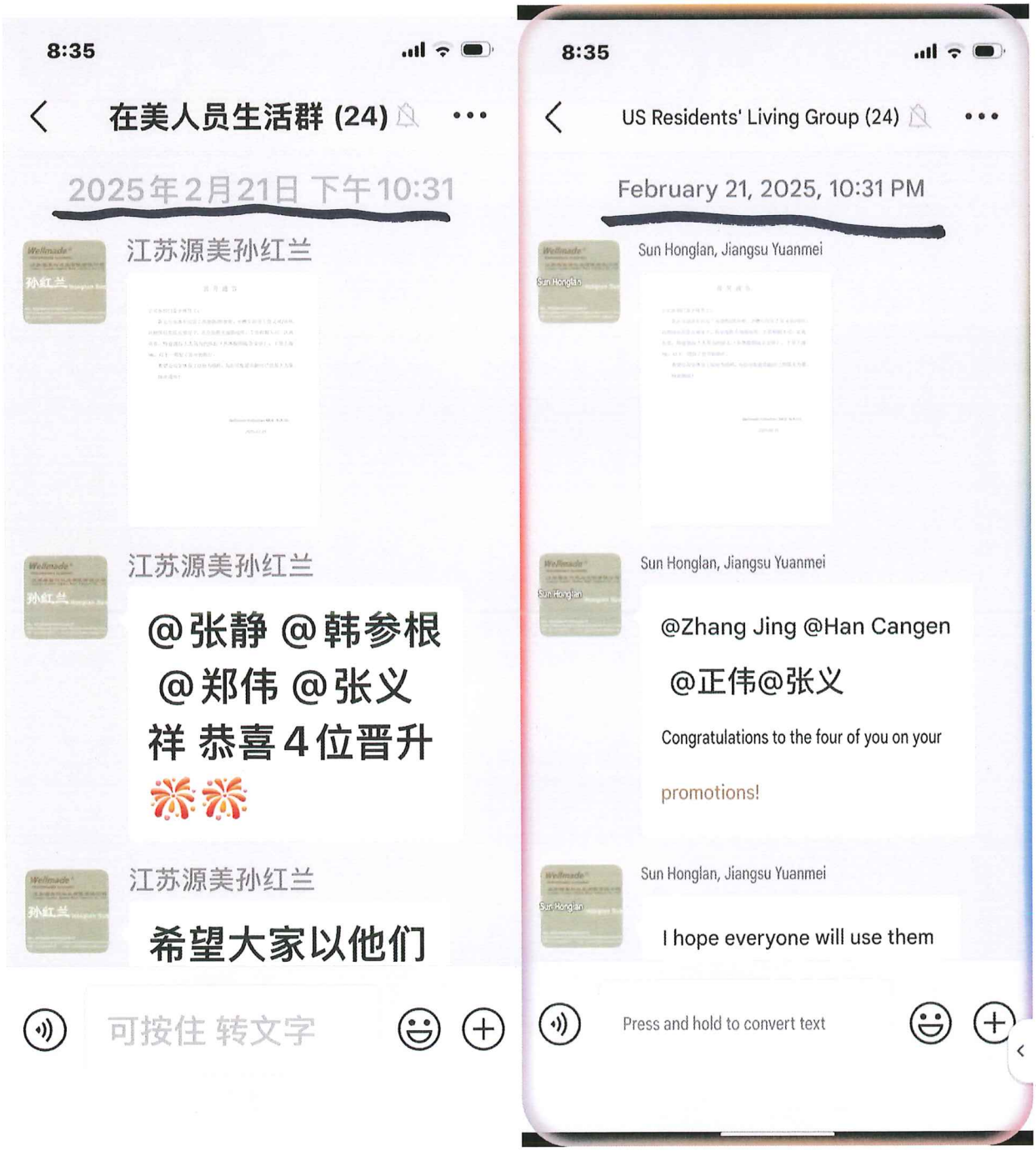


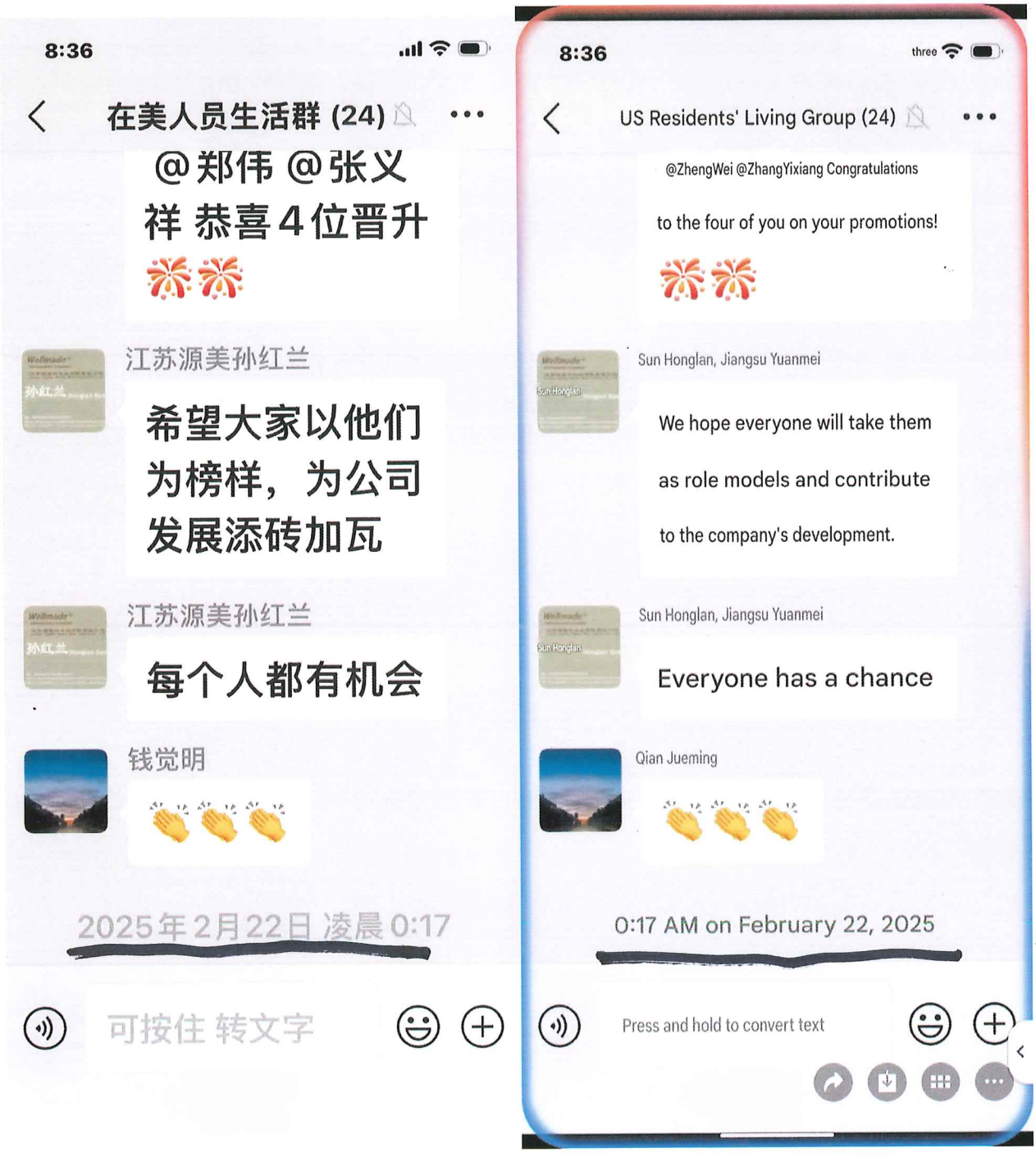



8:32
在美人员生活群 (24)
2025年1月29日 上午6:56
George Chen
2025要做到8000个柜子，干的多拿的多
George Chen
我目前就在抢订单
George Chen
兄弟们要确保质量，按时出货。
George Chen
可按住 转文字
10:32
8:32
Google
US Residents' Living Group (24)
6:56 AM, January 29, 2025
George Chen
The goal is to have 8,000 cabinets by 2025; the more you do, the more you earn.
George Chen
I'm currently grabbing orders
George Chen
Brothers, you must ensure quality and ship on time.
George Chen
偵測到的語言
英文


8:33
在美人员生活群 (24)
陆建军
通知：所有在美人员，明天下午6:00大会议室开会，收到请回复。
美李卫伟
收到
2025年1月29日 下午8:57
微信用户
收到
美国工厂陆太太梦幻人生
可按住 转文字
8:33
US Residents' Living Group (24)
Lu Jianjun
Notice: All personnel in the US, please reply to this notice in the main conference room at 6:00 PM tomorrow.
Li Weiwei
receive
January 29, 2025, 8:57 PM
WeChat users
receive
American Factory Mrs. Lu's Dream Life
正在翻譯
至「英文」


8:34
在美人员生活群 (24)
2025年2月12日 下午1:46
美国工厂陆太太梦幻人生
2025年2月12日 下午1:47
美国工厂陆太太梦幻人生
各位同事，1月份水电网络平摊费用，将在下一期工资内扣除，如有疑问，请联系我，谢谢
可按住 转文字
8:34
three
US Residents' Living Group (24)
February 12, 2025, 1:46 PM
American Factory Mrs. Lu's Dream Life
February 12, 2025, 1:47 PM
American Factory Mrs. Lu's Dream Life
Dear colleagues, the shared costs for utilities and internet in January will be deducted from your next paycheck. Please contact me if you have any questions.
Thank you.
Press and hold to convert text


8:35
在美人员生活群 (24)
2025年2月21日 下午10:31
江苏源美孙红兰
江苏源美孙红兰
@张静 @韩参根
@郑伟 @张义
祥 恭喜4位晋升
江苏源美孙红兰
希望大家以他们
可按住 转文字
8:35
US Residents' Living Group (24)
February 21, 2025, 10:31 PM
Sun Honglan, Jiangsu Yuanmei
Sun Honglan, Jiangsu Yuanmei
@Zhang Jing @Han Cangen
@正伟@张义
Congratulations to the four of you on your
promotions!
Sun Honglan, Jiangsu Yuanmei
I hope everyone will use them
Press and hold to convert text


8:36
在美人员生活群 (24)
@郑伟 @张义祥 恭喜4位晋升
江苏源美孙红兰
希望大家以他们为榜样，为公司发展添砖加瓦
江苏源美孙红兰
每个人都有机会
钱觉明
2025年2月22日 凌晨 0:17
可按住 转文字
8:36
three
US Residents' Living Group (24)
@ZhengWei @ZhangYixiang Congratulations to the four of you on your promotions!
Sun Honglan, Jiangsu Yuanmei
We hope everyone will take them as role models and contribute to the company's development.
Sun Honglan, Jiangsu Yuanmei
Everyone has a chance
Qian Jueming
0:17 AM on February 22, 2025
Press and hold to convert text

5

晋 升 通 告

公司各部门及全体员工：

我公司油漆车间员工张静静/韩参根，开槽车间员工张义祥/郑伟，自到岗后在陆总领导下，充分发挥主观能动性，工作积极主动、认真负责，特提拔以上人员为代班长（具体按照陆总安排），工资上涨5%，自下一期发工资开始执行。

希望公司全体员工以他为榜样，为公司发展贡献自己的最大力量。

特此通知！

Wellmade Industries MFR. N.A LLC

2025-02-21

Promotion notice

To all departments and employees of the company:

Our company's paint shop employees Zhang Jingjing/Han Cangen, and grooving shop employees Zhang Yixiang/Zheng Wei, have fully demonstrated their initiative and worked diligently and responsibly under the leadership of General Manager Lu since they started their jobs. Therefore, we are hereby promoting the above-mentioned employees to acting shift leaders (specific arrangements will be made according to General Manager Lu's instructions), with a 5% salary increase, effective from the next paycheck.

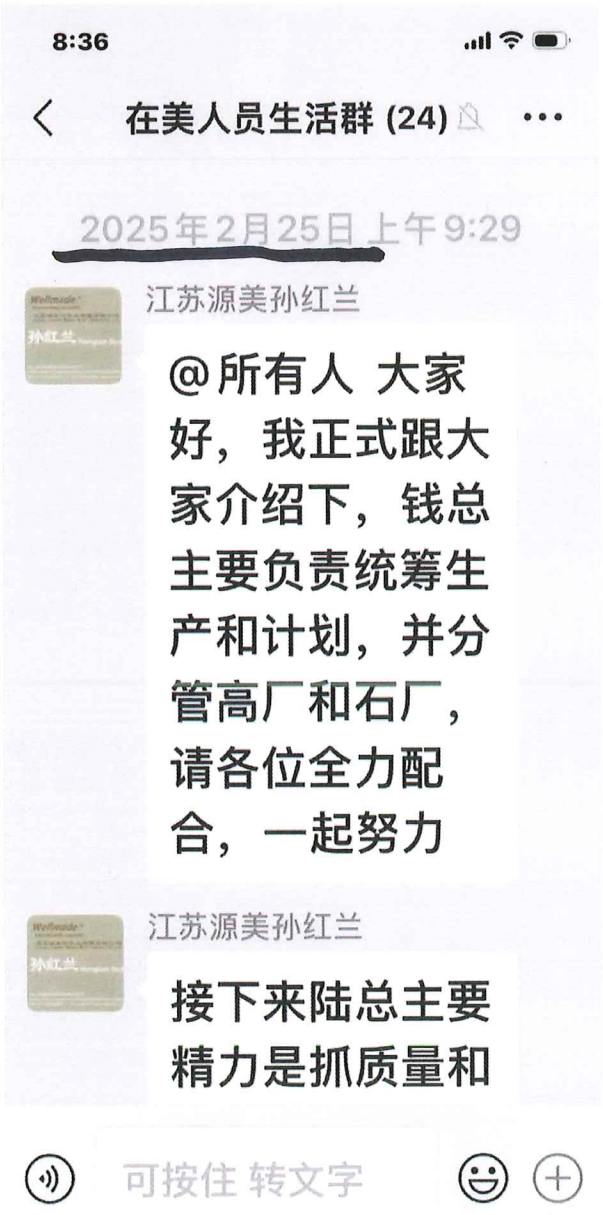
We hope that all employees will take him as an example and contribute their utmost to the company's development.

Notice hereby!

Wellmade Industries MFR. N.A LLC

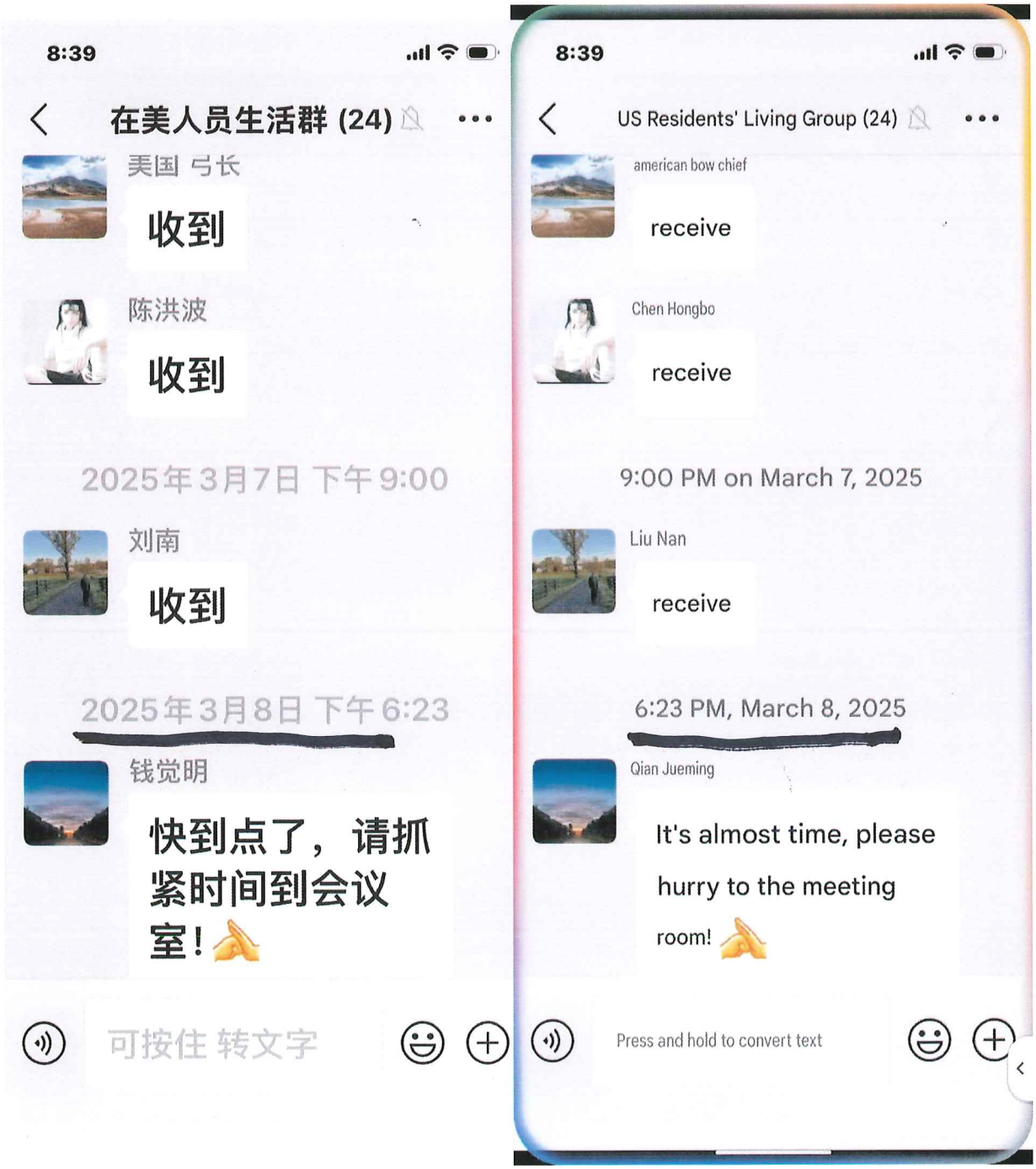
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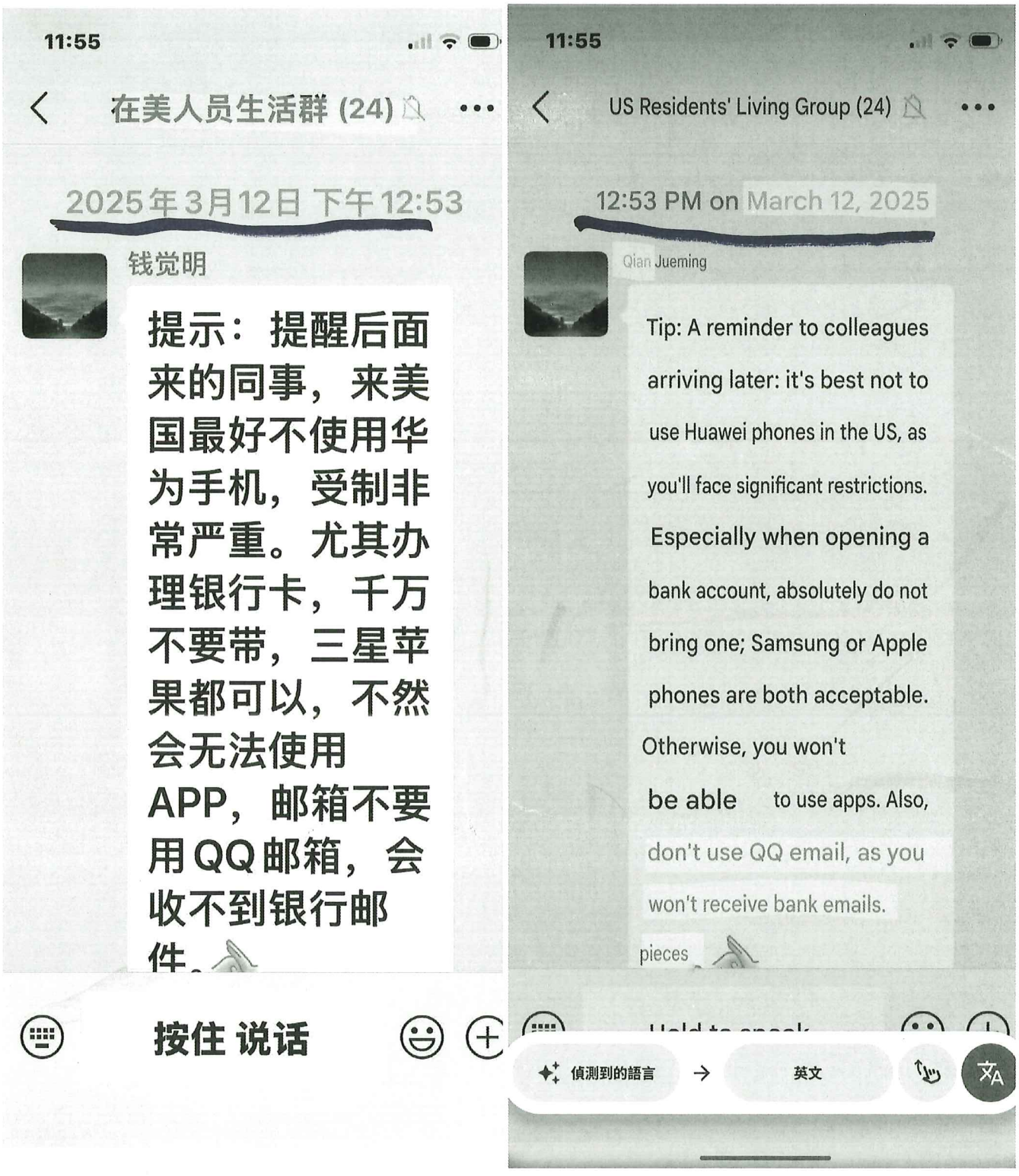
6


8:36
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
可按住 转文字

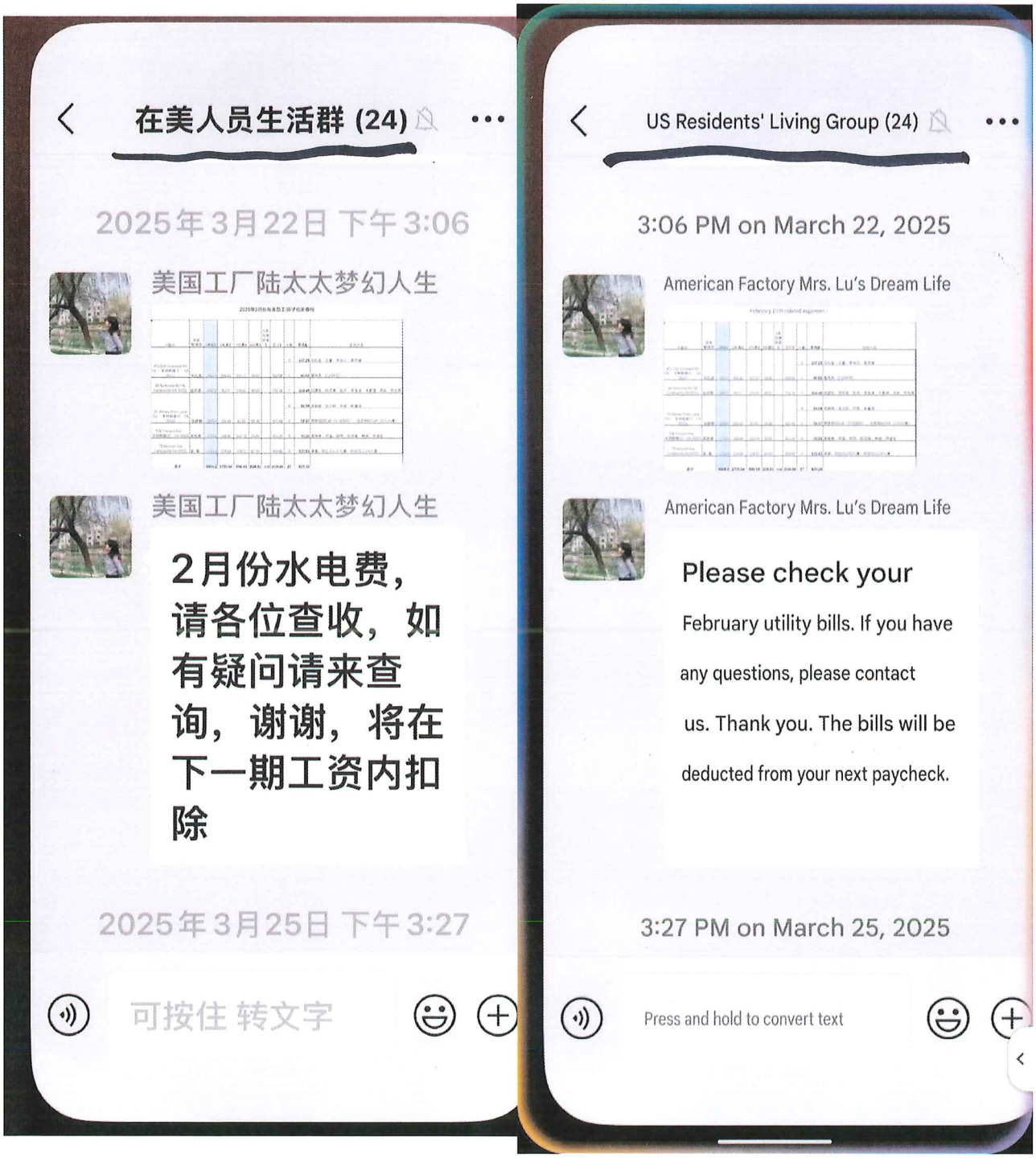

3:22
5G
US Residents' Living Group (24)
February 25, 2025, 9:29 AM
Sun Honglan, Jiangsu Yuanmei
@Everyone Hello everyone, let me formally introduce myself. Mr. Qian is mainly responsible for overall production and planning, and oversees both the high-tech plant and the stone plant. Please cooperate fully 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」


8:38
在美人员生活群 (24)
2025年3月7日 下午5:03
陆建军
@所有人：请全体人员明天下午6:25在大会议室开会，请提前到达。谢谢
微信用户
收到
2025年3月7日 下午5:08
美国工厂陆太太梦幻人生
收到
可按住 转文字
8:38
US Residents' Living Group (24)
5:03 PM on March 7, 2025
Lu Jianjun
@Everyone: Please attend the meeting in the main conference room tomorrow afternoon at 6:25 PM. Please arrive early. Thank you.
WeChat users
receive
5:08 PM on March 7, 2025
American Factory Mrs. Lu's Dream Life
receive
Press and hold to convert text


8:39
在美人员生活群 (24)
美国 弓长
收到
陈洪波
收到
2025年3月7日 下午9:00
刘南
收到
2025年3月8日 下午6:23
钱觉明
快到点了，请抓紧时间到会议室！
可按住 转文字
8:39
US Residents' Living Group (24)
american bow chief
receive
Chen Hongbo
receive
9:00 PM on March 7, 2025
Liu Nan
receive
6:23 PM, March 8, 2025
Qian Jueming
It's almost time, please hurry to the meeting room!
Press and hold to convert text


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

10


在美人员生活群 (24)
2025年3月22日 下午3:06
美国工厂陆太太梦幻人生
美国工厂陆太太梦幻人生
2月份水电费，请各位查收，如有疑问请来查询，谢谢，将在下一期工资内扣除
2025年3月25日 下午3:27
可按住 转文字
US Residents' Living Group (24)
3:06 PM on March 22, 2025
American Factory Mrs. Lu's Dream Life
American Factory Mrs. Lu's Dream Life
Please check your February utility bills. If you have any questions, please contact us. Thank you. The bills will be deducted from your next paycheck.
3:27 PM on March 25, 2025
Press and hold to convert text

11

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

IN RE: WELLMADE FLOOR COVERINGS INTERNATIONAL et al.,
Debtor(s)

Case No: 11

Chapter 25-58764-sms

RE: DOC. NO. 474 & 491.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify under penalty of perjury that I am, and at all times hereinafter mentioned, was more than 18 year of age, and that on the 27 day of August, 2026, I served a copy of CREDITOR HAITAO LI'S SUR-REPLY AND SUPPLEMENTAL DECLARATION IN OPPOSITION TO DEBTORS' REPLY BRIEF [DOC. NO. 491]

which was filed in this bankruptcy matter on the 27 day of August, 2026.

Mode of service (check one): ◯ MAILED ⊗ HAND DELIVERED & Email.

Name and Address of each party served (If necessary, you may attach a list.):

Bankruptcy Court - 75 Ted Turner Drive SW - Atlanta, GA 30303

Attn: Lindsay Kolba office of the United States Trustee, same as court address

Debtors Attn: John D. Elrod - elrodj@gtlaw.com; Allison McGregor@gtlaw.com

The Committee of Creditors Holding Unsecured Claims - gsmall@smallherrin.com; chumnicky@smallherrin.com; bklehr@smallherrin.com

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: 08.27.2026

Signature: Hai Tao Li

Printed Name: Hai Tao Li

Address: 318 PENN STATION WAY, EUHARLEE, GA 30120.

Phone: (404) 831-1894.

(Generic Certificate of Service – Revised 4/13)