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

In re:	Chapter 11
WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*,[1]	Case No. 25-58764
	(Jointly Administered)
Debtors.	

NOTICE OF DEBTORS' OBJECTION TO PROOFS OF CLAIM FILED BY ANTHONY DAVIS, DEADLINE TO OBJECT AND HEARING

PLEASE TAKE NOTICE that, on September 16, 2026, the above-captioned debtors and debtors in possession (the "Debtors") filed *Debtors' Objection to Proofs of Claim Filed by Anthony Davis* (the "Objection"). Pursuant to the Fifth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or hearing if no party in interest files a response or objection **within thirty (30) days** from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Clerk at the United States Bankruptcy Court for the Northern District of Georgia, 75 Ted Turner Drive, SW, Suite 1340, Atlanta, Georgia 30303, and serve a copy on the Debtors' attorney, at Greenberg Traurig, LLP, Terminus 200, 3333 Piedmont Road, NE, Suite 2500, Atlanta, Georgia 30305, Attn: John D. Elrod (elrodj@gtlaw.com) and Allison J. McGregor (Allison.McGregor@gtlaw.com),** and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the Objection has been scheduled for October 28, 2026. The Court will hold a hearing on the Objection at **10:15 a.m. (prevailing Eastern Time) on October 28, 2026 in Courtroom 1201, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested in the Objection without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the

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relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Date: September 16, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
John D. Elrod, GA Bar No. 246604
Allison J. McGregor, GA Bar No. 860865
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: (678) 553-2259
Facsimile: (678) 553-2269
Email: elrodj@gtlaw.com
Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

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)

DEBTORS' OBJECTION TO PROOFS OF CLAIM FILED BY ANTHONY DAVIS

(Disallowance of Claim Nos. 4 and 32)

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby file this Objection to proofs of claim filed by Anthony Davis ("Claimant") pursuant to sections 105 and 502 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the "Local Rules"). A proposed order is attached hereto as **Exhibit A** (the "Proposed Order"). In support of this Objection, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in the Court

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pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rule 3007, Local Rule 3007-1, and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the "Complex Case Procedures").

BACKGROUND

I. General Background

3. On August 4, 2025 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

4. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On August 14, 2025, the United States Trustee for Region 21 (the "U.S. Trustee") appointed an official committee of unsecured creditors (the "Committee") in the above-captioned chapter 11 cases (the "Cases"). No request has been made for the appointment of a trustee or an examiner.

II. The Claims Reconciliation Process

6. On September 4, 2025, the Debtors filed the *Debtors' Motion Seeking Entry of an Order (I) Setting a Bar Date for Filing Proofs of Claims; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claims; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief* [D.I. 137] (the "Bar Date Motion").

7. On October 9, 2025, the Court entered the *Order (I) Setting a Bar Date for Filing Proofs of Claim; (II) Setting an Amended Schedules Bar Date; (III) Setting a Rejection Damages*

Bar Date; (IV) Approving the Form of and Manner for Filing Proofs of Claim; (V) Approving Notice of the Bar Dates; and (VI) Granting Related Relief [D.I. 222] (the "Bar Date Order"), designating November 21, 2025 as the date by which all entities and individuals (except governmental units) are required to file proofs of claim in the Cases.

8. On September 3, 2025, Claimant filed a proof of claim, Claim No. 4, that was later amended by the filing of Claim No. 32 on October 22, 2025 (as amended, the "Claim"). The Claim seeks payment of $3,000,000 based on the "employment-related lawsuit". Attached to the Claim is a copy of the *Amended Complaint for Damages* (the "Complaint") that Claimant filed against Debtor Wellmade Industries MFR. N.A LLC and Zhu Chen prior to the Petition Date in the U.S. District Court for the Northern District of Georgia. *See Davis v. Wellmade Industries MFR. N.A LLC,* Case No. 4:25-CV-00030-WMR-WEJ (N.D. Ga. Apr. 28, 2025) (the "Lawsuit").

9. The Debtors have reviewed the Claim and believe the Claim is subject to disallowance in its entirety.

RELIEF REQUESTED

10. The Debtors respectfully request the entry of an order disallowing the Claim in its entirety.

GROUNDS FOR OBJECTION

11. Bankruptcy Code section 502 provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). The debtor has a duty to object to the allowance of any claim that is improper. *See* 11 U.S.C. § 1107(a).

12. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In*

re Allegheny Int'l, Inc., 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See id*.

13. A party wishing to dispute a claim's validity must produce evidence sufficient to negate the claim's *prima facie* validity. *See Allegheny*, 954 F.2d at 173–74. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id*. at 174; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS 1166, at *6-7 (N.D. Ga. Feb. 13, 2015); *Chambliss v. Oakwood Acceptance Corp. (In re Chambliss)*, 315 B.R. 166, 169 (Bankr. S.D. Ga. 2004). Ultimately, the burden of persuasion is on the claimant. *See In re Moss*, No. 94-11959, 1995 WL 17005342, at *1 (Bankr. S.D. Ga. Sept. 28, 1995).

14. The Claim filed by Claimant should be disallowed for several reasons, as detailed below.

A. The Claim Contains Insufficient Documentation.

15. The Claim was filed with only the attached Complaint, containing conclusory allegations without any supporting evidence. The conclusory allegations in the Complaint fail to demonstrate that Claimant is entitled to any relief, much less $3 million in damages.

16. Claimant does not provide sufficient information to evaluate the allowance of the Claim, including information regarding the amount of damages to which Claimant is allegedly entitled. The amount listed in the Claim is wholly speculative. In the Complaint, Claimant seeks damages for (i) lost wages and benefits, (ii) prejudgment interest, (iii) emotional distress, (iv) attorneys' fees, and (v) front pay. Yet, the Complaint does not include any amounts associated with these various damages or any calculation supporting those damages, even assuming Claimant could prove liability.

17. The Bar Date Order provides that "[e]ach Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d)." Bar Date Order, ¶ 11(e).

18. Because Claimant failed to include sufficient supporting documentation for his Claim and has alleged only conclusory facts supporting his theories of recovery, his Claim should be disallowed.

B. The Claim Should Be Disallowed on Substantive Grounds.

19. The Claim should also be disallowed because it lacks merit and is subject to affirmative defenses.

20. First, the facts support a finding that Claimant's termination was for a legitimate, non-retaliatory reason and that the Debtors acted lawfully and appropriately in all respects concerning Claimant.

21. The Claimant's employment was terminated solely because he refused to follow the direction of his supervisor and refused to report to her as required under the Debtors' policies. The Claimant's actions in this regard disrupted the orderly operation of the Debtors and prevented the Debtors from functioning properly.

22. Second, the causes of action in the Complaint are subject to various defenses, including, without limitation, (i) Claimant's failure to state a cognizable claim under 42 U.S.C. § 1981, (ii) Claimant's failure to mitigate any of his alleged damages, (iii) the doctrine of waiver, and (iv) the doctrine of unclean hands.

23. Accordingly, the Claim, which is based entirely on a Complaint that is subject to dismissal on numerous grounds including the above-referenced defenses, should be disallowed in its entirety.

RESERVATION OF RIGHTS

24. The Debtors reserve all rights to amend, modify, or supplement this Objection and the Proposed Order, and to file additional objections to any claims filed in these Cases. The Debtors further reserve all rights, claims, and defenses with respect to all claims, including the claim addressed herein. Nothing in this Objection or the Proposed Order shall be deemed to impair, waive, or otherwise limit any such rights, claims, or defenses, all of which are expressly preserved.

NOTICE

25. The Debtors will provide notice of this Objection to the following parties or their respective counsel, if known: (a) the Claimant, (b) the Office of the U.S. Trustee for the Northern District of Georgia, (c) the Committee; (d) the Debtors' prepetition and postpetition lenders; (e) the Limited Service List; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Debtors respectfully request that this Court enter the Proposed Order granting the relief requested herein and such other and further relief as is just and proper.

Dated: September 16, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
John D. Elrod, GA Bar No. 246604
Allison J. McGregor, GA Bar No. 860865

3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: 678-553-2259
Facsimile: 678-553-2269
Email: elrodj@gtlaw.com
Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

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)

ORDER SUSTAINING DEBTORS' OBJECTION
TO PROOFS OF CLAIM FILED BY ANTHONY DAVIS

Upon the *Debtors' Objection to Proofs Of Claim Filed By Anthony Davis*, dated September 16, 2026 [Docket No. •] (the "Objection")[2] filed by the above-captioned debtors and debtors in

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[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

possession (collectively, the "Debtors"), for entry of an order (this "Order") disallowing and expunging Claim Nos. 4 and 32; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Objection in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the opportunity to object and for hearing on the Objection having been given pursuant to the procedures set forth in Fifth Amended and Restated General Order No. 24-2018; and the Court having considered the Objection and all other matters of record, including the lack of objection thereto; and based on the foregoing, no further notice or hearing is required; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation thereon, it is hereby **ORDERED** that**:**

1. The Objection is **SUSTAINED**.

2. Claim Nos. 4 and 32 are disallowed and expunged.

3. Nothing set forth in this Order shall be construed as, or shall in any way constitute, a waiver of the Debtors' or any successor's rights to assert objections to the Claim on any additional grounds whatsoever.

4. The Debtors and their claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita, as well as the Clerk of the Court, are authorized to take all such actions as are necessary and appropriate to effectuate the terms of this Order.

5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

END OF DOCUMENT

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
John D. Elrod, GA Bar No. 246604
Allison J. McGregor, GA Bar No. 860865
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: 678-553-2259
Facsimile: 678-553-2269
Email: elrodj@gtlaw.com
Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

Distribution List

Wellmade Floor Coverings International, Inc.
1197 Peachtree St. NE, Suite 780
Atlanta, GA 30361
Attn: David Baker

Greenberg Traurig, LLP
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, Georgia 30305
Attn: John D. Elrod

Kurtzman Carson Consultants LLC d/b/a Verita Global
222 N. Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245
Attn: Drake D. Foster

Office of the United States Trustee
362 Richard Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303
Attn: Lindsay Kolba

Weems M&E, LLC
1615 Environs Lane
Dalton, GA 30720

The Workers Firm of Georgia
7000 Central Parkway,
Suite 1100, Office 23
Atlanta, GA 30328
Attn: Patrick Reid

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2026, all ECF participants registered in this case were served electronically with the foregoing Objection 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 Objection, including on the Limited Service List. The Claimant was also served through U.S. Mail and electronic mail as follows:

Severin Roberts
Patrick Reid
The Workers Firm of Georgia
7000 Central Parkway,
Suite 1100, Office 23
Atlanta, Georgia 30328
patrick@theworkersfirm.com

Dated: September 16, 2026
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod
John D. Elrod, GA Bar No. 246604
Allison J. McGregor, GA Bar No. 860865
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone: 678-553-2259
Facsimile: 678-553-2269
Email: elrodj@gtlaw.com
Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession