

**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

(Jointly Administered)

**THE LABOR PLAINTIFFS' LIMITED OBJECTION TO
DEBTORS' SECOND INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES
INCURRED BY GREENBERG TRAURIG, LLP, COUNSEL FOR THE
DEBTORS, FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH
FEBRUARY 28, 2026**

On April 2, 2026, Debtors filed their Second Interim Application for Allowance of Compensation and Reimbursement of Expenses Incurred by Greenberg Traurig, LLP ("GT"), Counsel for the Debtors, for the period from November 1, 2025 through February 28, 2026. (ECF No. 365 (the "GT Second Interim Fee Application").

The Labor Plaintiffs¹ hereby submit a limited objection to the GT Second Interim Fee Application based on the reasons set forth below and reserve the right

¹ The Labor Plaintiffs include: Yucong Liu (Claims No. 82, 84, 122-3, 124, 126), Yixiang Zhang (Claims No. 107-8), Cangen Han (Claims No. 85-6), Nan Liu (Claims No. 88-9), Haitao Sun (Claims No. 87, 90), Yao Yan (Claims No. 77, 80), Shuai Zhang (Claims No. 102-3), Shengxiang Yu (Claims No. 79, 81), Jiansheng Yin (Claims No. 109, 111), Wen Chen (Claims No. 64-5), Shengda Yu (Claims No. 78, 83), Shun Yu (Claims No. 66, 98), Jinchao Si (Claims No. 67-8), Shunkui Wang

to object to these and all other applications for fees and costs at the time of final fee application approval pursuant to 11 U.S.C. § 330. While the Labor Plaintiffs acknowledge that the sale has been successful in generating significant funds for the estate, and the Labor Plaintiffs and Debtors have reached a global settlement subject to Court approval pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure, the Labor Plaintiffs caution that this should not be an invitation for professionals in this case to engage in unnecessary or excessive billing, particularly while the entire universe of general unsecured claims remains unliquidated, and the parties' settlements have not yet been approved.

In reviewing the GT Second Interim Fee Application, the Labor Plaintiffs are concerned by the magnitude of this request for \$500,713.00 in fees for 488.2 hours of work at a blended hourly rate of \$938.44.

The first GT Interim Fee Application [ECF No. 275] requested \$751,570 in fees for over 780 hours of work at a blended hourly rate of \$879.81.

As with Labor Plaintiffs' limited objection to GT's first interim fee application [ECF No. 287], here again Labor Plaintiffs are concerned that the GT Second Interim Fee Application reflects excessive staffing (17 attorneys),

(Claims No. 69-70), Jiagen Yang (Claims No. 74, 92), Jingjing Zhang (Claims No. 91, 93), Yanxi Gao (Claims No. 101, 110), Yorman Ojeda Herrera (Claims No. 116-7), Marianela Piña Yaguari (Claims No. 99-100), Eglis Almarza Diaz (Claims no. 118-9), Sijian Jiang (Claims No. 95, 112), Weiwei Li (Claims No. 94, 104), Guangshun Xing (Claims No. 75-6), Xianlai Wei (Claims No. 106, 113), and Pan Wang (Claims No. 96, 105).

unnecessary and excessive litigation (\$298,064.50 for claims administration and objections), inefficient billing, and services to advance equity holders' personal interests.

The Labor Plaintiffs are not requesting either a hearing or a ruling on their limited objections at this time. However, the Labor Plaintiffs are reserving their rights on these objections for the final fee application pursuant to 11 U.S.C. § 330. "A final fee application must be filed at the end of each professional's engagement or the end of the case... Any amounts that were awarded as interim compensation are subject to reconsideration at any time prior to the final award, for any reason." 3 COLLIER ON BANKRUPTCY, ¶331.04[3] at 331-23 (Richard Levin & Henry J. Sommer eds., 16th ed.).

Respectfully submitted this day: April 14, 2026.

/s/ Daniel Werner
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CERTIFICATE OF SERVICE

I, Daniel Werner, certify that I am over the age of 18 and on this date I filed and served copies of the foregoing *THE LABOR PLAINTIFFS' LIMITED OBJECTION TO DEBTORS' SECOND INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED BY GREENBERG TRAURIG, LLP, COUNSEL FOR THE DEBTORS, FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH FEBRUARY 28, 2026* by using the Court's Electronic Case Filing program, which sends a notice of the above-listed document and an accompanying link to the document to the parties who have appeared in this case under the Court's Electronic Case Filing program, as indicated in **Exhibit A**.

This 14th day of April 2026.

By: /s/ Daniel Werner
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Exhibit A

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