

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)

**NOTICE OF FIRST INTERIM APPLICATION
FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES INCURRED BY GREENBERG TRAUIG, LLP,
COUNSEL FOR THE DEBTORS, FOR THE PERIOD FROM AUGUST 4, 2025
THROUGH OCTOBER 31, 2025, DEADLINE TO OBJECT AND HEARING**

PLEASE TAKE NOTICE that, on December 2, 2025, the Greenberg Traurig, LLP (the “Applicant”) filed *First Interim Application for Allowance of Compensation and Reimbursement of Expenses Incurred by Greenberg Traurig, LLP, Counsel to the Debtors for the Period of August 4, 2025 Through October 31, 2025* (the “Application”). 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 twenty-one (21) 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 Bankruptcy Clerk at 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 Application has been scheduled for January 6, 2026. The Court will hold a hearing on the Application at **1:30 p.m. (prevailing Eastern Time) on January 6, 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**

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.

relief requested in the Application 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 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: December 2, 2025
Atlanta, Georgia

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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Allison J. McGregor, GA Bar No. 860865
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**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)

**SUMMARY OF FIRST INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED BY
GREENBERG TRAURIG, LLP, COUNSEL FOR THE DEBTORS, FOR THE
PERIOD FROM AUGUST 4, 2025 THROUGH OCTOBER 31, 2025**

Name of applicant:	Greenberg Traurig, LLP
Services Provided to:	Debtors and Debtors in Possession
Name of Certifying Professional:	John D. Elrod
Date of Application to Employment:	August 28, 2025 [Docket No. 102]
Date of Order Authorizing Employment:	September 9, 2025, effective as of August 4, 2025 [Docket No. 151]
Period for this Application:	August 4, 2025 through October 31, 2025
Amount of Compensation Sought:	\$751,570.00
Amount of Expense Reimbursement:	\$11,370.24
Amount of Original Retainer:	\$550,000.00
Current Balance of Retainer:	\$1,000.00
Blended Hourly Rate for Attorneys in this	\$879.81

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.

Application:	
This is an Interim / Final Application	Interim

Payment of Monthly Fee Statements

Time Period	Fees Requested	Expenses Requested	Date of Payment	Fees Paid	Expenses Paid
August 4, 2025 through August 31, 2025	\$301,706.00	\$4,284.45	10/21/25	\$301,706.00	\$4,284.45
September 1, 2025 through September 30, 2025	\$234,871.00	\$942.98	11/17/25	\$234,871.00	\$942.98
October 1, 2025 through October 31, 2025	\$214,993.00	\$6,142.81	12/1/25	\$214,993.00	\$6,142.81
Total	\$751,570.00	\$11,370.24		\$751,570.00	\$11,370.24

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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)

**FIRST INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED BY GREENBERG
TRAURIG, LLP, COUNSEL FOR THE DEBTORS, FOR THE PERIOD FROM
AUGUST 4, 2025 THROUGH OCTOBER 31, 2025**

Greenberg Trurig, LLP (“GT”), counsel to the above captioned debtors and debtors in possession (collectively, the “Debtors”) in these Chapter 11 Cases (as defined below), hereby files this *First Interim Application for Allowance of Compensation and Reimbursement of Expenses Incurred by Greenberg Traurig, LLP, Counsel to the Debtors for the Period of August 4, 2025 Through October 31, 2025* (this “Application”) seeking allowance of compensation and reimbursement of expenses pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”) for the period from August 4, 2025 through October 31, 2025 (the “Application Period”). GT submits this Application for (a) allowance of reasonable compensation for

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professional services rendered by GT to the Debtors in the amount of \$751,570.00, and (b) reimbursement of actual and necessary charges and disbursements incurred by GT in the rendition of required professional services on behalf of the Debtors in the amount of \$11,370.24. This Application meets all of the requirements set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted on January 30, 1996 (the “UST Guidelines”). In support of this Application, GT respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”) has jurisdiction over these cases and this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested herein are sections 105, 327(a), and 331 of the Bankruptcy Code, Rule 2016 of the Bankruptcy Rules, Rule 9013-2 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), and Procedure J of the Complex Case Procedures.

BACKGROUND

3. On August 4, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the Court (collectively, the “Chapter 11 Cases”). The Debtors have continued in possession of their properties and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner in these cases.

4. The factual background relating to the Debtors’ commencement of these cases is

set forth in the *Declaration of David Baker, CTP in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 14] (the “First Day Declaration”) filed on or about the Petition Date and incorporated herein by reference.

5. On August 7, 2025, the Court entered the *Order Authorizing and Directing Joint Administration of the Debtors’ Chapter 11 Cases for Procedural Purposes Only* [Docket No. 25] (the “Joint Administration Order”) authorizing the joint administration and procedural consolidation of the Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b).

6. On August 14, 2025, the United States Trustee (the “U.S. Trustee”) appointed the official committee of unsecured creditors (the “Committee”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 59].

7. This Application has been prepared in accordance with the UST Guidelines.

8. The Debtors have received and reviewed this Application. The Debtors have found that this Application accurately represents the work done by GT on their behalf and approve the request for interim approval of the compensation and reimbursement sought in this Application.

9. The Debtors have filed their monthly operating reports for all periods through October 31, 2025 and have paid all quarterly U.S. Trustee fees to date.

RETENTION OF GT

10. On August 26, 2025, the Debtors filed the *Application of the Debtors for Entry of an Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors-in-Possession, Effective as of the Petition Date* [Docket No. 102] (the “Retention Application”) to perform legal services necessary to enable the Debtors to maximize

the value of their estates through the Chapter 11 Cases.² On September 9, 2025, the Court entered the *Order Authorizing the Employment and Retention of Greenberg Traurig, LLP as Counsel for the Debtors and Debtors-in-Possession, Effective as of the Petition Date* [Docket No. 151] (the “Retention Order”) authorizing the Debtors to retain GT as their counsel under the terms set forth in the Retention Application.

11. The terms and conditions of employment and compensation are set forth in the engagement letter attached as Exhibit A to the Retention Application.

COMPENSATION PAID AND ITS SOURCES

12. All services for which GT seeks compensation were performed for or on behalf of the Debtors.

13. There is no agreement or understanding between GT and any other person except for the partners of GT for the sharing of compensation to be received for the services rendered in this case.

REQUESTED FEES AND REIMBURSEMENT OF DISBURSEMENTS

14. In connection with its efforts during the Application Period, GT now seeks interim allowance of \$751,570.00 in fees calculated at the hourly billing rates of the firm’s personnel who have worked on this case, and \$11,370.24 in charges and disbursements of actual and necessary expenses incurred by GT while providing services to the Debtors during the Application Period.

15. Pursuant to the terms of the Complex Case Procedures, GT has submitted monthly statements for services rendered during the Application Period and has received payments in respect of such monthly statements totaling \$762,940.24, of which \$751,570.00 has been applied to fees and \$11,370.24 has been applied to expenses.

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the Retention Application.

16. Prior to the Petition Date, GT received a retainer from the Debtor in connection with this representation. A portion of such retainer was applied to GT's pre-petition fees and expenses associated with this representation and the balance of the retainer is currently \$1,000.00.

17. **Exhibit A** attached hereto sets forth the time spent and the work performed by each attorney and paraprofessional for the Application Period. To the best of GT's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the UST Guidelines, and the Complex Case Procedures.

18. GT's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services in a case other than under the Bankruptcy Code.

ACTUAL AND NECESSARY EXPENSES

19. A summary of the actual and necessary expenses incurred by GT for the Application Period is attached hereto as **Exhibit B**. GT submits that all such expenses were necessarily incurred, are reasonable in amount, and represent only the actual costs incurred.

20. GT's charges for expenses to the Debtors are determined in the same manner as for clients in non-bankruptcy cases. Out-of-pocket expenses incurred by GT are charged to a client if the expenses incurred for the client are otherwise necessary in connection with services rendered for such particular client. GT does not factor general overhead expenses into disbursements charged to clients in connection with Chapter 11 cases.

21. GT customarily charges \$0.75 per page for color photocopies and \$0.10 per page for greyscale photocopies. GT's operational team which handles photocopy requests records the number of copies made and summarizes each client's photocopying charges on a daily basis.

22. GT charges its clients for the actual expenses related to business meals and travel. In these Chapter 11 Cases, this is generally comprised of the transportation costs between GT's

Atlanta office and the Court to attend and present at scheduled hearings.

23. GT believes the foregoing rates are the market rates generally employed by the majority of law firms when charging their clients for such services.

24. GT has made every effort to minimize its expenses in these Chapter 11 Cases. All of the expenses for which allowance and payment are requested by GT in this Application are reasonable and necessary and were incurred during the Application Period.

PROFESSIONAL SERVICES RENDERED

25. In accordance with the UST Guidelines, all GT professionals kept a contemporaneous record of time spent rendering services and separated tasks in billing increments of one-tenth (0.10) of an hour.

26. **Exhibit C** attached to this Application is a summary of the legal services which GT rendered to the Debtors during the Application Period divided by project category. The services rendered by GT during the Application Period can be grouped into the categories set forth in **Exhibit C**. GT attempted to place the services performed in the category that best relates to the services provided. However, because certain services may relate to more than one category, services pertaining to one category may in fact be included in another category. The actual detailed daily time entries for all work performed by the attorneys and paraprofessionals who rendered services during the Application Period are attached as **Exhibit D**. Such time entries are organized by subject matter category as required by the UST Guidelines.

27. GT has represented the Debtors with respect to various matters arising in the Debtors' Chapter 11 Cases. Among other things, GT has advised the Debtors with respect to its (a) successful transition to operating in Chapter 11; (b) fulfillment of the various reporting obligations in connection with the commencement of the case, including the preparation of schedules, statements of financial affairs, and monthly operating reports; (c) negotiating and documenting the

DIP Facility; (d) establishing the claim bar dates; and (e) the successful sale of substantially all of the Debtors' assets.

INDEXING OF TASKS BY PROJECT CATEGORY

28. As annexed to this Application, GT has organized its time records by activity codes in accordance with the UST Guidelines. Generally, each of the time entries of the attorneys and paralegals of GT have been indexed into one of the following categories:³

001 Asset Analysis and Recovery: Review and analysis of potential assets of the Debtors.

002 Asset Disposition: Preparation of documents and pleadings for and negotiations in relation to the bidding procedures, asset sales, leases, amendments, abandonment, and transaction work related to asset disposition.

003 Assumption/Rejection of Leases and Contracts: Analyses of leases and executory contracts, preparation of motions and pleadings to assume or reject the same, and negotiations with respect to cure costs.

006 Business Operations: Matters related to the Debtors ongoing business operations.

007 Case Administration: Matters relating to the general administration of these Chapter 11 Cases, including (i) finalizing, filing, and discussing the chapter 11 petition packages and first-day motions; (ii) coordinating with the Debtors' claims and noticing agent regarding presentation of case website and service issues; (iii) maintaining the case calendar; (iv) establishing and maintaining a data room utilized for general case use, including in connection with diligence requests in connection with the sale process; (v) preparing for hearings; and (vi) responding to information requests from various parties.

008 Claims Administration and Objections: Attention to specific claim inquiries, including with respect to the analyses, objections and allowances of various claims.

009 Corporate Governance and Objections: Reviewing, analyzing, amending and maintaining the Debtors' business and corporate governance.

010 Employee Benefits/Pensions: Matters related to the Debtors' ongoing business operations, including the Debtor's management of its various employees and dealing with employment related claims.

011 Fee/Employment Applications: Preparation of employment, fee statements and fee

³ The following task codes and time categories are the primary categories in which time was billed by GT during the Application Period and may not reflect every time category in which time was billed during such time as reflected on **Exhibit C**.

applications.

013 Financing/Cash Collections: Matters related to cash collateral, liquidity analyses, and the negotiation and drafting of documents in relation to the DIP Facility.

014 Other Contested Matters (excluding assumption/rejection motions): Activities relating to research and the preparation of potential contested hearings to objecting creditors.

015 Meetings of and Communications with Creditors: Preparation for and attendance of meetings and communications with creditors, including the Committee.

017 Plan and Disclosure Statement (including Business Plan): Draft, review, revise and negotiate the Plan and Disclosure Statement and corresponding exhibits and attachments.

019 Reporting: Draft, review, and revise Monthly Operating Reports.

022 Hearings: Preparation for, attendance and presentation at scheduled hearings.

023 Schedules and Statements: Draft, review and revise the Debtors' schedules and statement of financial affairs.

DESCRIPTION OF SERVICES

Asset Analysis and Recovery (Task Code 001)

29. During the Application Period, GT reviewed various documents and assisted the Debtors in identifying and protecting potential assets including causes of action and non-litigation recoveries.

30. GT expended **74.7 hours** in this category and is requesting **\$73,749.00** for the services rendered in this category.

Asset Disposition (Task Code 002)

31. GT facilitated the Debtors' negotiations with the Stalking Horse Purchaser on the terms of a stalking horse asset purchase agreement, which was executed in September. GT assisted the Debtors in responding to the due diligence requests of several bidders with respect to contracts, leases, trademarks, domain names, and other assets prior to proceeding with a private sale with the Stalking Horse Purchaser. Throughout the Application period, GT engaged in

frequent communications with the Debtors' Advisors, the Committee's counsel, and various creditors of the Debtors regarding the sale and marketing process.

32. In preparation for the potential sale of substantially all of the Debtors' assets, GT drafted, negotiated, and revised the Bidding Procedures Motion and corresponding order seeking authority to schedule an auction at which the Debtors would solicit the highest or best bid for the sale of substantially all of the Debtors' assets and approval of the Bidding Procedures. GT communicated with the Debtors' Advisors, the Committee, the Stalking Horse Purchaser's counsel, and various interested parties relating to the same and presented the Bidding Procedures Motion at a hearing which was approved by the Court on August 21, 2025.

33. GT also negotiated an increased purchase price and private sale with the Stalking Horse Purchaser, which was subsequently approved on October 8, 2025.

34. GT expended **152.4 hours** in this category and is requesting **\$181,274.50** for the services rendered in this category.

Assumption/Rejection of Leases and Contracts (Task Code 003)

35. During the Application Period, GT reviewed and analyzed the Debtors' contracts and leases and conferred with the Debtors' Advisors and management regarding the rejection of certain executory contracts and unexpired non-residential leases. GT prepared motions seeking to reject certain unexpired leases determined by the Debtors to be unnecessary to the administration of these Chapter 11 Cases and burdensome to the estate. GT assisted the Debtors' Advisors in the determination and negotiation of cure amounts with the counsel of certain landlords and contract counterparties and worked expeditiously to resolve numerous official and unofficial objections to the cure amounts.

36. Throughout the Application Period, GT prepared cure notices and worked with counterparties to resolve outstanding cure objections. After the closing of the sale, GT continued

to interface with counsel for certain landlords and contract counterparties in response to inquiries regarding, *inter alia*, the assumption or rejection of the respective contracts or leases, disputed cure amounts, and other related questions.

37. GT expended **1.5** hours in this category and is requesting **\$1,050.00** for the services rendered in this category.

Business Operations (Task Code 006)

38. During the Application Period, GT conducted a variety of conference calls with respect to the Debtors' business operations and corresponded regularly with management and the Debtors' Advisors with respect to bank account management and employment/immigration issues.

39. GT expended **1.4** hours in this category and is requesting **\$1,108.00** for the services rendered in this category.

Case Administration (Task Code 007)

40. During the Application Period, GT assisted and counseled the Debtors on matters concerning all aspects of the administration of these cases, and conducted numerous conferences with the Debtors' representatives, including David Baker as Chief Restructuring Officer (the "CRO"), Aurora Management Partners ("Aurora") which provided additional personnel, and Hilco Corporate Finance, LLC, as the Debtors' investment banker ("Hilco," and together with the CRO and Aurora, the "Advisors").

41. GT assisted the Debtors with the filing of the First Day Pleadings (as defined in the First Day Declaration) on August 4, 2025, and prepared for and attended the hearing to consider the First Day Pleadings on August 7, 2025. GT assisted with the preparation of the Debtors' second day motions and responded to multiple inquiries from creditors and interested parties regarding the

filing and status of the Chapter 11 Cases, prepared various orders resulting from the first day hearings in these cases and conducted discussions relating to the publishing of notice of the Debtors' chapter 11 filings. GT regularly communicated with Kurtzman Carson Consultants LLC d/b/a Verita Global ("Verita"), the Debtors' claims, noticing, solicitation and administrative agent, regarding service issues in these cases, and conducted discussions relating to the status of open issues.

42. To facilitate the Debtors' business operations in these Chapter 11 Cases, GT also prepared a motion seeking approval for procedures to retain and compensate certain professionals utilized in the ordinary course of business and the related filings thereto.

43. GT conducted research regarding various issues, assisted the Debtors with filing their schedules of assets and liabilities, and statements of financial affairs, conducted discussions regarding, and assisted with the preparation of, various motions and orders during the Application Period as identified above.

44. GT expended **304.1 hours** in this category and is requesting **\$232,239.50** for the services rendered in this category.

Claims Administration and Objections (Task Code 008)

45. On numerous occasions, GT communicated with Aurora on the claims reconciliation process and corresponded with creditors regarding their alleged claims and spent time reviewing, analyzing and conducting research with respect to such claims.

46. Throughout the Application Period, GT responded to various creditors' inquiries ranging from the First Day Pleadings, Critical Vendor Claims, 503(b)(9) Claims, the establishment of claims bar dates, and the sale and marketing process.

47. GT expended **99.8 hours** in this category and is requesting **\$116,711.00** for the

services rendered in this category.

Corporate Governance and Objections (Task Code 009)

48. During the Application Period, GT reviewed, revised and negotiated certain nondisclosure agreements concerning the Debtors' assets and business operations relating to the sale.

49. GT expended **0.3** hours in this category and is requesting **\$232.50** for the services rendered in this category.

Employee Benefits/Pensions (Task Code 010)

50. During the Application Period, GT helped translate and draft certain notices and communications about to the Debtors' bankruptcy cases to be shared with current and former employees for whom English is not their first language.

51. GT expended **0.7** hours in this category and is requesting **\$600.00** for the services rendered in this category.

Fee/Employment Applications (Task Code 011)

52. GT prepared and filed multiple retention applications as well as supporting declarations and corresponding orders approving such applications, including, without limitation, with respect to GT, as Debtors' counsel, Hilco, as the Debtors' investment banker, Aurora, as the Debtors' financial advisors, and Verita, as the Debtors' claims, noticing, solicitation and administrative agent. GT also prepared monthly fee and expense statements to confirm compliance with the UST Guidelines as well as the redaction of certain privileged and confidential information.

53. GT expended **35.9 hours** in this category and is requesting **\$42,290.00** for the services rendered in this category.

Financing/Cash Collections (Task Code 013)

54. GT corresponded regularly with the DIP Lender, the Debtors' Advisors, and the Committee's counsel regarding financing, funding and budget issues and regularly reviewed and analyzed cash flow forecasts and updated Budget (as defined in the *Final Order (I) Authorizing the Debtors to Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting (A) Liens and Superpriority Administrative Expense Claims and (B) Adequate Protection; (III) Authorizing Use of Cash Collateral; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief* [Docket No. 191]). GT drafted, negotiated, and closed the DIP Credit Agreement (as defined in the DIP Motion) and amendments thereto, as well as corresponding orders approving entry into the same. GT also reviewed and analyzed objections to the DIP Motion and held multiple conference calls with respect to addressing and the ultimate resolution of the same.

55. GT expended **19.4** hours in this category and is requesting **\$24,077.50** for the services rendered in this category.

Other Contested Matters (excluding assumption/rejection motions) (Task Code 014)

56. During the Application Period, GT provided advice and analysis regarding other contested matters affecting the estates not otherwise covered by the foregoing task codes. This included, without limitation, correspondence with counsel for certain creditors regarding various objections to certain First Day Motions and the Motion to Set Bar Date and preparation for potential evidentiary hearings and/or potential contested hearings.

57. GT expended **27.2** hours in this category and is requesting **\$19,213.00** for the services rendered in this category.

Meeting of and Communications with Creditors (Task Code 015)

58. GT corresponded regularly with and held multiple conference calls with the Committee's counsel regarding the status of numerous matters, including, without limitation, the

sale and marketing process, the claims bar dates, and the Chapter 11 Plan and Disclosure Statement.

59. GT was also present at and helped prepare the Debtors for, the meeting of the creditors held on September 15, 2025 and September 22, 2025.

60. GT expended **10.8 hours** in this category and is requesting **\$9,375.00** for the services rendered in this category.

Plan and Disclosure Statement (including Business Plan) (Task Code 017)

61. GT has begun strategizing, drafting, and reviewing a proposed Plan to be filed in these Chapter 11 Cases.

62. GT expended **0.3** hours in this category and is requesting **\$352.50** for the services rendered in this category.

Reporting (Task Code 019)

63. During the Application Period, GT assisted the Debtors with the review and filing of their monthly operating reports.

64. GT expended **4.9** hours in this category and is requesting **\$5,685.00** for the services rendered in this category.

Hearings (Task Code 022)

65. During the Application Period, GT prepared for, attended and presented at several hearings.

66. GT expended **15.9** hours in this category and is requesting **\$12,602.50** for the services rendered in this category.

Schedules and Statement (Task Code 023)

67. During the Application Period, GT assisted the Debtors with the review and filing of their schedules and statement of financial affairs.

68. GT expended **33.3** hours in this category and is requesting **\$31,010.00** for the

services rendered in this category.

VALUATION OF SERVICES

69. Attorneys and professionals of GT expended a total of **782.6** hours in connection with this case during the Application Period. The reasonable value of those services is **\$751,570.00** based on the hourly rates set forth on **Exhibit A**.

70. This is GT's first request for an award of interim compensation in this case. No previous application has been made to this or any other court for the relief requested herein.

71. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by GT is fair and reasonable given (a) the initial posture of this case and the nature of this reorganization; (b) the issues arising in connection with the sale of the Debtor's assets and the objections raised in connection with the sale; (c) the time and labor required to represent the Debtors effectively; (d) the nature and extent of services rendered; (e) GT's experience, reputation and ability; (f) the value of GT's services; and (g) the cost of comparable services other than in a case under the Bankruptcy Code.

72. The compensation sought herein is based on the customary compensation charged by comparably skilled practitioners in cases other than cases under the Bankruptcy Code.

73. GT has reviewed the requirements of the UST Guidelines and believes that this Application complies in all material respects with those requirements. To the extent this Application does not comply in every respect with the requirements of such guidelines, GT respectfully requests a waiver for any such technical non-compliance.

COMPLIANCE WITH RULE 2016 OF THE BANKRUPTCY RULES

74. In accordance with Rule 2016 of the Federal Rules of Bankruptcy Procedure, GT hereby states that (a) all services for which compensation is sought herein were rendered to the Debtors solely in connection with its Chapter 11 Cases and not on behalf of any committee,

individual creditor or other person; (b) to date on a post-petition basis GT has received only those payments made to it by the Debtors pursuant to the Complex Case Procedures; (c) no agreement or understanding exists between GT and any other person for the sharing of compensation to be received for services rendered in or in connection with this case; and (d) no division of compensation will be made by GT, except as between members of GT, and no agreement prohibited by 18 U.S.C. § 155 or section 504 of the Bankruptcy Code has been made.

NOTICE

75. Notice of this Application has been provided to the Limited Service List. In light of the nature of the relief requested, the Debtors submit that no further notice is necessary.

NO PRIOR REQUEST

76. No prior request for the relief sought in this Application has been made to this or any other court.

CONCLUSION

WHEREFORE, GT respectfully requests that the Court enter an Order substantially in the form attached hereto as **Exhibit E**: (i) providing that for the period from August 4, 2025 through October 31, 2025, an interim allowance be made to GT in the sum of **\$751,570.00** as compensation for necessary and reasonable professional services rendered and the sum of **\$11,370.24** for reimbursement of actual and necessary costs and expenses, (ii) authorizing and directing the Debtors pay GT the sum of **\$751,570.00** as compensation for necessary and reasonable professional services rendered and **\$11,370.24** for reimbursement of actual and necessary costs and expenses in full in cash, less any amounts previously received by GT, during the Application Period, and (iii) for such other and further relief as this Court may deem just and proper.

Dated: December 2, 2025
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

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Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, all ECF participants registered in this case were served electronically with the foregoing 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, including on the Limited Service List.

Dated: December 2, 2025
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, GA 30305

Telephone: 678-553-2259

Facsimile: 678-553-2269

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Allison.McGregor@gtlaw.com

Counsel for the Debtors and Debtors in Possession

Exhibit A

WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., et al.

**Application Period
August 4, 2025 Through October 31, 2025**

Timekeeper	Year Admitted to Practice	Hours Billed	2025 Hourly Rate	Total Compensation
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Shareholders

Rick Bold	2010	7.00	\$900.00	\$6,300.00
John D. Elrod	2001	303.50	\$1,250.00	\$379,375.00
Jake C. Evans	2012	36.70	\$850.00	\$31,195.00
Alison Franklin	2003	15.40	\$1,275.00	\$19,635.00
Irina Khasin	2009	0.30	\$875.00	\$262.50
Ari Newman	2008	33.50	\$1,175.00	\$39,362.50
George Qi	1998	1.10	\$1,385.00	\$1,523.50
Paul B. Ranis	1995	2.10	\$925.00	\$1,942.50
Steven J. Rosenwasser	1998	3.70	\$1,150.00	\$4,255.00
Michael Slocum	2003	8.90	\$950.00	\$8,455.00
Miriam C. Thompson	2014	1.00	\$795.00	\$795.00
Jared Weir	2010	0.20	\$1,245.00	\$249.00
David R. Yates	2001	26.20	\$1,135.00	\$29,737.00
Dawn Zhang	2003	0.20	\$1,275.00	\$255.00
Totals		439.80		\$523,342.00

Of Counsel

Philip J. George	2014	19.10	\$880.00	\$16,808.00
Totals		19.10		\$16,808.00

Associates

Josh Bernstein	1995	5.00	\$625.00	\$3,125.00
William E. Eye	2016	2.20	\$855.00	\$1,881.00
Brian J. Landau	2020	0.30	\$775.00	\$232.50
Gerond J. Lawrence	2013	6.20	\$835.00	\$5,177.00
Yangyi Liu	2017	0.50	\$690.00	\$345.00
Allison J. McGregor	2021	258.80	\$700.00	\$181,160.00
Diego Sasias Arroyo	2017	0.60	\$560.00	\$336.00
Totals		273.60		\$192,256.50

Paraprofessionals

Nara Heard	N/A	8.90	\$400.00	\$3,560.00
Gail L. Jamrok	N/A	0.70	\$560.00	\$392.00

Sandy King	N/A	0.40	\$435.00	\$174.00
Tyler Sheridan	N/A	40.10	\$375.00	\$15,037.50
Totals		50.10		\$19,163.50

	Total Billed Hours	Total Compensation
Total Attorneys and Paraprofessionals	782.60	\$751,570.00

Blended Hourly Rate for Attorneys and Paraprofessionals: \$879.81

Blended Hourly Rate for Attorneys: \$959.32

Blended Hourly Rate for Paraprofessionals: \$442.50

Exhibit B

WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*

Summary of Expenses and Disbursements

**Application Period
August 4, 2025 Through October 31, 2025**

Expenses	Amount
Filing Fees	\$3,942.00
Information and Research	\$5,290.14
Local Travel	\$65.90
Postage	\$1,360.00
Professional & Legal	\$313.00
UPS Charges	\$399.20
TOTAL	\$11,370.24

Exhibit C

WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*

Project Categories

**Application Period
August 4, 2025 Through October 31, 2025**

<u>Task Code</u>	<u>Hours</u>	<u>Value</u>
Asset Analysis and Recovery (001)	74.7	\$73,749.00
Asset Disposition (002)	152.4	\$181,274.50
Assumption/Rejection of Leases and Contracts (003)	1.5	\$1,050.00
Business Operations (006)	1.4	\$1,108.00
Case Administration (007)	304.1	\$232,239.50
Claims Administration and Objections (008)	99.8	\$116,711.00
Corporate Governance and Board Matters (009)	0.3	\$232.50
Employee Benefits/Pensions (010)	0.7	\$600.00
Fee/Employment Applications (011)	35.9	\$42,290.00
Financing/Cash Collections (013)	19.4	\$24,077.50
Other Contested Matters (excluding assumption/rejection motions) (014)	27.2	\$19,213.00
Meetings of and Communications with Creditors (015)	10.8	\$9,375.00
Plan and Disclosure Statement (including Business Plan) (017)	0.3	\$352.50
Reporting (019)	4.9	\$5,685.00
Hearings (022)	15.9	\$12,602.50
Schedules and Statement (023)	33.3	\$31,010.00
TOTAL	782.60	\$751,570.00

Exhibit D

WELLMADE FLOOR COVERINGS INTERNATIONAL, INC., *et al.*

Detailed Time Entries

Application Period

August 4, 2025 Through October 31, 2025



Invoice No. : 1001155422
File No. : 217339.012900
Bill Date : October 3, 2025

Wellmade Industries MFR, N.A.
P.O. Box 52897
Atlanta, GA 30355

Attn: David Baker

INVOICE

Re: Chapter 11 Bankruptcy

Legal Services through August 31, 2025:

Asset Analysis and Recovery:	\$	52,857.50
Asset Disposition:	\$	63,474.50
Case Administration:	\$	111,293.50
Corporate Governance and Board Matters:	\$	232.50
Fee/Employment Applications:	\$	38,245.00
Financing/Cash Collections:	\$	22,827.50
Other Contested Matters (excluding assumption/rejection motions):	\$	4,793.00
Meetings of and Communications with Creditors:	\$	210.00
Hearings:	\$	7,772.50
Total Fees:	\$	301,706.00

Expenses:

Filing Fees	3,675.00	
Information and Research	609.45	
Total Expenses:	\$	<u>4,284.45</u>
Current Invoice:	\$	<u>305,990.45</u>

JCE:MM

Invoice No.: 1001155422
Matter No.: 217339.012900

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Description of Professional Services Rendered:

TASK CODE: AIRP001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/25	John D. Elrod	Review and revised chapter 11 first day motions (8.2); calls with client regarding motion (.3); calls with T. Stratton (.3); calls with clerk's office and courtroom deputy (.3); calls and emails with AHF's counsel regarding APA and interim DIP order (.5)	9.60	12,000.00
08/04/25	Jake C. Evans	Status update re BK (0.5); execute items on same (0.4); generate next case steps (0.4); review non-compete provision of APA (0.4).	1.70	1,445.00
08/04/25	Jake C. Evans	Conference re BK (0.2) and preparation for same (0.1).	0.30	255.00
08/04/25	Philip J. George	Review and revise joint statement regarding Rule 23 and communications regarding effect of bankruptcy filing.	0.70	616.00
08/04/25	Ari Newman	Draft and revise APA and correspondence regarding same (.9); review revised drafts of Interim DIP Order (.4); correspondence regarding DIP, cash collateral and case issues (.4).	1.70	1,997.50
08/05/25	John D. Elrod	Review and revised debtor in possession financing motion (2.5); review and revised critical vendor motion (1.0); communication with the US Trustee's office regarding first day issues (1.1); review and revised budget (.5); negotiations with AHF regarding stalking horse bid (.6); review of AHF APA markup and communication with client regarding same (.8); call with client and professionals regarding APA (1.2); call with client and investment banker regarding APA and financing (.5); emails with proposed DIP lender and counsel (.4); call with investment banker (.4); review of correspondence regarding potential bidders (.4); preparation for first day hearings (1.7)	11.10	13,875.00
08/05/25	Jake C. Evans	Emails re revised APA and non-compete.	0.20	170.00
08/05/25	Jake C. Evans	Emails re discovery to G. Chen (0.2); coordinate filing of Notice of Suggestion of BK (0.1).	0.30	255.00
08/05/25	Jake C. Evans	Conference re BK filing (0.3), next steps and strategy on same (0.5); draft accompanying emails (0.2).	1.00	850.00
08/06/25	Jake C. Evans	Conferences and emails re BK and strategy on same (0.5); attend first day hearing on	1.00	850.00

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Description of Professional Services Rendered

08/06/25	Jake C. Evans	BK (0.5). Prepare for and attend first hearing in bankruptcy action (1.0); debrief and generate next steps on same (0.5).	1.50	1,275.00
08/06/25	Philip J. George	Review notices of bankruptcy.	0.10	88.00
08/07/25	Jake C. Evans	Conferences re next steps in BK proceeding (0.3); discussion on co-owning IP (0.1); draft emails on same (0.1).	0.50	425.00
08/07/25	Philip J. George	Communications regarding notice of bankruptcy.	0.10	88.00
08/08/25	Jake C. Evans	Conference re co-ownership of patent (0.3), TigerEye being added to creditor list and considerations for same (0.3); catch-up with J. Elrod on same (0.3); conference with E. Eiland on status and next steps (0.3).	1.20	1,020.00
08/08/25	Philip J. George	Finalize notice of bankruptcy.	0.10	88.00
08/12/25	Jake C. Evans	Communications re payments to Tigereye and counsel of record on same.	0.20	170.00
08/13/25	Jake C. Evans	Emails re allowed vendor payments.	0.20	170.00
08/13/25	Jake C. Evans	Operational conference with leadership re protocols and implementation of same (0.5); debrief on same and generate next steps (0.5).	1.00	850.00
08/13/25	Jake C. Evans	Conferences re next steps in BK action and strategy on same.	0.20	170.00
08/14/25	Jake C. Evans	Emails and conferences re bid process and in-coming bids (0.4); draft emails on same (0.3); communicate with potential bids (0.3).	1.00	850.00
08/14/25	Philip J. George	Review EEOC complaint and communications regarding same.	0.30	264.00
08/15/25	Philip J. George	Communications regarding potential defenses and suggestions of bankruptcy.	0.20	176.00
08/17/25	Jake C. Evans	Emails re operational check lists and AHF inquires for diligence.	0.30	255.00
08/17/25	Jake C. Evans	Emails and consideration re inventory (0.1), and considerations re same to ensure sufficient supplies for manufacturing product (0.2).	0.30	255.00
08/18/25	Jake C. Evans	Emails on Davis EEOC complaint (0.1); and filing of notice of suggestion of BK for same (0.1).	0.20	170.00
08/18/25	Jake C. Evans	Conference re tripartite agreement and considerations for same.	0.30	255.00
08/18/25	Philip J. George	Communications regarding strategy for response to complaint.	0.20	176.00
08/19/25	Jake C. Evans	Conference with E. Eiland at Tricorner re asset purchase.	0.40	340.00
08/19/25	Philip J. George	Communications with co-defense counsel regarding strategy for motions to stay and responsive pleadings.	0.40	352.00
08/20/25	Jake C. Evans	Participate in conference with AHF's team	1.10	935.00

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 Matter No.: 217339.012900

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Description of Professional Services Rendered

08/20/25	Philip J. George	for purposes of diligence (0.5); debrief on same with D. Quinlan and J. Bradford (0.3); and generate next matter steps (0.3). Communications regarding strategy for potential defenses.	0.10	88.00
08/21/25	Jake C. Evans	Review BK pleadings to assess matter status and strategy (1.0); internal meeting on same with J. Elrod, D. Baker, A. Chen (1.0); generate next steps in light of same (1.0).	3.00	2,550.00
08/21/25	Jake C. Evans	Review emails re case status (0.2); conference with A. Chen on updates, strategy and next steps (0.2).	0.40	340.00
08/21/25	Philip J. George	Attend meeting with A. Chen and GT team to discuss strategy (1.0), review background documents and begin to formulate defenses (0.4).	1.40	1,232.00
08/25/25	Jake C. Evans	Prepare for and participate in conference with co-defense team (0.5); debrief and coordinate next case steps (0.5).	1.00	850.00
08/25/25	Jake C. Evans	Review emails and agreements re AHF and updated offer (0.1); conferences on same (0.2)	0.30	255.00
08/25/25	Philip J. George	Participate in call with J. Evans and M. Slocum regarding defenses and strategy for letter (1.0), draft common interest agreement (0.7), begin to perform research for defenses for letter to opposing counsel (0.7).	2.40	2,112.00
08/25/25	Michael Slocum	Develop and evaluate defense and settlement strategies, including review of annotated complaint from client	1.50	1,425.00
08/25/25	Michael Slocum	Prepare and revise email memorandum regarding defense and settlement strategies	1.20	1,140.00
08/26/25	John D. Elrod	Communication with counsel for AHF and client regarding potential private sale	0.40	500.00
08/26/25	Jake C. Evans	Conference re potential settlement offer by plaintiffs and strategy for same.	0.30	255.00
08/26/25	Jake C. Evans	Conference re AHF's updated offer and status of bankruptcy (0.2); coordinate next steps and draft emails on same (0.1).	0.30	255.00
08/26/25	Jake C. Evans	Review motion to stay case pending BK (0.1); draft emails on same (0.1).	0.20	170.00
08/28/25	John D. Elrod	Attention to various sale and APA issues (.5); communication with client regarding same (.3)	0.80	1,000.00

Total Hours: 50.70

Total Amount: \$ 52,857.50

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Description of Professional Services Rendered

TIMEKEEPER SUMMARY FOR TASK CODE AIRP001.

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	21.90	1,250.00	27,375.00
Jake C. Evans	18.40	850.00	15,640.00
Ari Newman	1.70	1,175.00	1,997.50
Michael Slocum	2.70	950.00	2,565.00
Philip J. George	6.00	880.00	5,280.00
Totals:	50.70	1,042.55	\$ 52,857.50

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Description of Professional Services Rendered

TASK CODE: AIRP002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/25	Ari Newman	Draft and revise Bidding Procedures Motion and related documents (2.4); correspondence with J. Elrod regarding bidding procedures matters (.4); review revisions to DIP Order (.3); review revisions to APA (.1).	3.20	3,760.00
08/06/25	John D. Elrod	Attention to bid procedures motion and deadline (2.3); communication with counsel for AHF regarding APA (.8); prepared for and attended first day hearings (4.9); call with US Trustee in advance of first day hearings and addressed items resulting from same (2.1); revised first day orders in light of comments from court and counsel (1.8)	11.90	14,875.00
08/06/25	Ari Newman	Draft and revise Bidding Procedures Motion and related notices (1.9); correspondence regarding sale timeline (.3); review APA regarding sale process and timeline (.2); draft Stratton Declaration (1.1).	3.50	4,112.50
08/07/25	John D. Elrod	Communication with client regarding sale issues (.3); review and revised Stratton declaration in support of bid procedures (.4); review of AHF APA and suggested edits to same (.7);	1.40	1,750.00
08/07/25	John D. Elrod	Review and revised bid procedures motion	4.30	5,375.00
08/07/25	Ari Newman	Draft and revise Bidding Procedures Motion (.8); correspondence with GT team and AHF's counsel regarding, timeline and sale matters (.4); revise Stratton declaration in support of Bidding Procedures (.4); draft emergency motion to shorten time on bidding procedures (1.0); call with J. Elrod regarding bidding procedures matters (.1).	2.70	3,172.50
08/07/25	David R. Yates	Attention to NDA.	0.40	454.00
08/08/25	Allison J. McGregor	Emails regarding Stalking Horse Bid	0.30	210.00
08/08/25	Ari Newman	Correspondence with potential buyer regarding sale issues.	0.20	235.00
08/11/25	John D. Elrod	Attention to sale issues and communication with counsel for AHF regarding same (.3); review of disclosure schedules draft to AHF APA (.2)	0.50	625.00
08/11/25	Ari Newman	Draft and revise Disclosure Statement for APA (1.3); correspondence regarding sale matters (.2).	1.50	1,762.50
08/12/25	Ari Newman	Review Order shortening notice and	0.30	352.50

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Description of Professional Services Rendered

		updating Notice of Hearing (.2); correspondence with GT team regarding same (.1).		
08/13/25	Allison J. McGregor	Emails with Aurora re APA Escrow Account	0.10	70.00
08/14/25	John D. Elrod	Communication with potential bidder Barlinek (.5); review updated CIM (.3); communication with AHF regarding sale process issues (.4); call with client executives regarding potential AHF meeting (.3); communication with potential buyer Novelis (.3); attention to bid procedures issues (1.1)	2.90	3,625.00
08/14/25	Ari Newman	Correspondence regarding sale related matters.	0.20	235.00
08/17/25	Ari Newman	Review various diligence requests (.6); correspondence regarding APA and diligence requests (.4).	1.00	1,175.00
08/18/25	John D. Elrod	Call with T. Stratton regarding sale issues (.4); communication with counsel for AHF regarding transaction issues (.9); attention to potential auction vs. private sale issues (.5)	1.80	2,250.00
08/18/25	Ari Newman	Correspondence regarding sale matters.	0.20	235.00
08/19/25	John D. Elrod	Calls with client regarding sale issues (1.1); communication with AHF regarding sale issues (0.3); call with committee counsel regarding sale issues (.2)	1.60	2,000.00
08/19/25	Ari Newman	Review UCC comments (.2); correspondence with J. Elrod regarding same (.1).	0.30	352.50
08/20/25	John D. Elrod	Call with counsel for AHF re bid procedures (.2); prepared for and participated in call between AHF and Wellmade regarding potential transition issues (1.5); negotiated bid procedures (.7)	2.40	3,000.00
08/20/25	Ari Newman	Draft and revise bidding procedures order, bidding procedures and related notices (1.5); correspondence regarding sale process and negotiations (.2); review revisions to bidding procedures (.2).	1.90	2,232.50
08/21/25	Ari Newman	Review amended and restated APA (.2); correspondence regarding updated Bid Procedures (.2).	0.40	470.00
08/25/25	John D. Elrod	Communication with counsel for AHF and client regarding potential private sale offer (.2); call with client regarding offers (.3); review of proposed edits to APA (.3); attention to auction issues (.6); communication with committee regarding protective order issues (.4)	1.80	2,250.00
08/25/25	Ari Newman	Correspondence regarding APA and bidding procedures.	0.30	352.50

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Description of Professional Services Rendered

08/26/25	Ari Newman	Correspondence regarding APA and sale issues.	0.30	352.50
08/27/25	Ari Newman	Correspondence with counsel for UCC and Buyer regarding APA (.2); review revisions to A&R APA (.2); call with J. Elrod regarding various sale matters (.3); correspondence with GT team regarding disclosure schedules (.5); correspondence with client regarding A&R APA (.4).	1.60	1,880.00
08/28/25	Ari Newman	Calls with client and GT team regarding APA disclosure schedules and related issues (.9); draft and revise provisions of disclosure schedules (.5); correspondence regarding service obligations (.3).	1.70	1,997.50
08/28/25	David R. Yates	Video conference with GT team and Aurora team regarding disclosure schedules (0.6); Attention to diligence materials and disclosure schedules (0.6); Phone conference with A. Newman and related amended and restated APA (0.6); Conference call with J. Elrod and A. Newman (0.6).	2.40	2,724.00
08/29/25	David R. Yates	Attention to updating of disclosure schedules (0.7); and related correspondence with GT team (0.7).	1.40	1,589.00
			Total Hours:	52.50
			Total Amount:	\$ 63,474.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP002.

ASSET DISPOSITION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	28.60	1,250.00	35,750.00
Ari Newman	19.30	1,175.00	22,677.50
David R. Yates	4.20	1,135.00	4,767.00
Allison J. McGregor	0.40	700.00	280.00
Totals:	52.50	1,209.04	\$ 63,474.50

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Description of Professional Services Rendered

TASK CODE: AIRP007 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/25	Nara Heard	Draft Notice of Suggestion of Pendency of Bankruptcy & Automatic Stay of Proceedings.	1.30	520.00
08/04/25	Allison J. McGregor	Revise Draft DIP Financing Motion	2.20	1,540.00
08/04/25	Allison J. McGregor	Email CRO regarding permission to file for bankruptcy	0.10	70.00
08/04/25	Allison J. McGregor	Call with Aurora and Hilco regarding filing bankruptcy case (0.70); Type of Meeting Minuets reflecting call (0.90)	1.60	1,120.00
08/04/25	Allison J. McGregor	Revise and Draft DIP Financing Motion	2.50	1,750.00
08/04/25	Allison J. McGregor	Revise and Draft Employee Wage Motion	0.30	210.00
08/04/25	Allison J. McGregor	Revise and Draft Tax Motion	1.00	700.00
08/04/25	Allison J. McGregor	Revise and Draft Declaration in Support of DIP Financing Motion	0.40	280.00
08/04/25	Allison J. McGregor	Email Aurora regarding information needed for critical vendor motion	0.20	140.00
08/04/25	Allison J. McGregor	Call with Client and Aurora to discuss information still needed for certain first day motions	1.40	980.00
08/04/25	Allison J. McGregor	Revise Insurance Motion	0.50	350.00
08/04/25	Allison J. McGregor	Revise Cash Management Motion	0.60	420.00
08/05/25	Nara Heard	Finalize Notice of Suggestion to Pendency of Bankruptcy & Automatic Stay of Proceedings.	0.30	120.00
08/05/25	Nara Heard	Draft Notice of Suggestions Pendency of Bankruptcy & Automatic Stay Proceedings.	0.70	280.00
08/05/25	Allison J. McGregor	Draft Outline for First Day Hearing	3.40	2,380.00
08/05/25	Allison J. McGregor	Revise and Draft Critical Vendor Motion	0.80	560.00
08/05/25	Allison J. McGregor	Draft Notice of Proposed Budget	0.80	560.00
08/05/25	Allison J. McGregor	Emails with J. Elrod and S. Fields regarding preparation for First Day Hearing	0.10	70.00
08/05/25	Allison J. McGregor	Email Verita regarding creditor matrix information	0.40	280.00
08/05/25	Allison J. McGregor	Revise and Draft DIP Financing Motion	1.30	910.00
08/05/25	Allison J. McGregor	Call with Hilco answering question about the recent bankruptcy filing	0.50	350.00
08/05/25	Allison J. McGregor	Revise Agenda for First Day Hearing	0.40	280.00
08/05/25	Allison J. McGregor	Draft Amended Order Authorizing Joint Administration	0.20	140.00
08/05/25	Allison J. McGregor	Review and Finalize Motion for Expedited Hearing and Order Granting Complex Case Procedures	0.20	140.00
08/05/25	Allison J. McGregor	Call with Verita discussing creditors matrix	0.20	140.00
08/05/25	Allison J. McGregor	Emails regarding payments to critical vendors	0.80	560.00
08/06/25	Allison J. McGregor	Revise Proposed Order Approving	1.00	700.00

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Description of Professional Services Rendered

		Retention of Claims Agent and Circulate Draft to UST		
08/06/25	Allison J. McGregor	Call with UST to discuss first day motions	0.90	630.00
08/06/25	Allison J. McGregor	Draft Outline for First Day Hearing	2.30	1,610.00
08/06/25	Allison J. McGregor	Respond to emails regarding questions about first day hearing and related information	0.70	490.00
08/06/25	Allison J. McGregor	Review proposed orders prior to filing	0.20	140.00
08/06/25	Allison J. McGregor	Revise Proposed Order Approving Payment of Critical Vendors	0.50	350.00
08/07/25	John D. Elrod	Attention to schedules and statements of financial affairs and communication with client and Aurora regarding same (.5); call with Aurora regarding cash expenditures (.2); review of orders entered by Court (.5)	1.20	1,500.00
08/07/25	Nara Heard	Amend Draft Notice of Suggestion Pendency of Bankruptcy & Automatic Stay Proceedings.	0.20	80.00
08/07/25	Allison J. McGregor	Emails with Aurora regarding first day order and questions from the UST	0.70	490.00
08/07/25	Allison J. McGregor	Circulate DIP Agreement for Signature	0.20	140.00
08/07/25	Allison J. McGregor	Draft Notice of Hearing re Final Hearing on First Day Motions	0.60	420.00
08/07/25	Allison J. McGregor	Contact Chambers regarding availability for potential sale hearing	0.10	70.00
08/07/25	Allison J. McGregor	Determine whether Motion to Shorten Time was needed for Bid Procedures Hearing and Review emergency Motion to shorten time	0.80	560.00
08/07/25	Allison J. McGregor	Emails with UST regarding contact information for unsecured creditors	0.20	140.00
08/08/25	Nara Heard	Amend Draft Notice of Suggestion Pendency of Bankruptcy & Automatic Stay Proceedings.	0.20	80.00
08/08/25	Nara Heard	Amend Draft Notice of Suggestion Pendency of Bankruptcy & Automatic Stay Proceedings	0.20	80.00
08/08/25	Nara Heard	Finalize and File Notice of Suggestion Pendency & Automatic Stay Proceedings.	0.40	160.00
08/08/25	Nara Heard	Finalize and File Notice of Suggestion Pendency & Automatic Stay Proceedings.	0.40	160.00
08/08/25	Allison J. McGregor	Revise and File Notice of Commencement of Bankruptcy Case	0.90	630.00
08/08/25	Allison J. McGregor	Emails regarding account number and wiring instructions for DIP funding	0.30	210.00
08/11/25	John D. Elrod	Calls and emails with client regarding case issues (.6); review and edited responses to US Trustee questionnaire (.5)	1.10	1,375.00
08/11/25	Allison J. McGregor	Email J. Elrod regarding payment pursuant to Critical Vendor Motion and Interim Order	0.30	210.00
08/11/25	Allison J. McGregor	Emails with Aurora regarding Georgia Power and Utilities Payment	0.10	70.00

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08/11/25	Allison J. McGregor	Email Hilco regarding hearing on bidding procedures	0.10	70.00
08/11/25	Allison J. McGregor	Review and Revise Answer to UST's Initial Inquiries questions	0.80	560.00
08/12/25	John D. Elrod	Emails with client regarding case issues (.5); review of bidding procedures notice of hearing (.2); call with client regarding vendor issues (.8)	1.50	1,875.00
08/12/25	Allison J. McGregor	Emails with S. Fields regarding filing of notice of hearing of bid procedures motion	0.50	350.00
08/12/25	Allison J. McGregor	Finalize and send responses to UST's Initial Case Inquiries	0.50	350.00
08/13/25	John D. Elrod	Call with CRO regarding case issues (.2); call with client operating executives (.7); attention to overseas procurement issues (.5); communication with AHF's counsel on case issues (.2)	1.60	2,000.00
08/14/25	John D. Elrod	Attention to unsecured creditor committee formation, review of creditor status, and communication with client regarding same	0.50	625.00
08/14/25	Gerond J. Lawrence	Review and analyze case law to identify applicability of bankruptcy stay to EEOC charge.	2.10	1,753.50
08/14/25	Allison J. McGregor	Email client draft of fully executed engagement letter with aurora	0.10	70.00
08/14/25	Allison J. McGregor	Draft Motion for Authorization for CRO and Investment Banker to bring electronic equipment into courtroom	0.50	350.00
08/14/25	Allison J. McGregor	Emails with Aurora regarding upcoming deadlines	0.20	140.00
08/14/25	Allison J. McGregor	Emails regarding electronics in courtroom	0.30	210.00
08/14/25	Allison J. McGregor	Email aurora regarding payment of pre-petition payroll	0.20	140.00
08/15/25	Gerond J. Lawrence	Review and analyze case law to identify applicability of bankruptcy stay to EEOC charge (3.3); Draft and revise assessment on applicability of bankruptcy stay to EEOC investigative function to assess need for drafting position statement (.8).	4.10	3,423.50
08/15/25	Allison J. McGregor	Email J. Elrod re filing electronic devices motion	0.10	70.00
08/15/25	Allison J. McGregor	Emails regarding tax notice from Bartow-Cartersville Joint Development Authority	0.40	280.00
08/15/25	Allison J. McGregor	Draft Proposed Final DIP Order	1.70	1,190.00
08/18/25	John D. Elrod	Attention to committee formation issues (.5); initial call with counsel for committee (.3); call with client regarding potential supplier issues (.6)	1.40	1,750.00
08/18/25	Allison J. McGregor	Review IDI requests and email Aurora regarding information needed	0.40	280.00
08/18/25	Allison J. McGregor	Draft Proposed Final DIP Order	2.60	1,820.00
08/18/25	Allison J. McGregor	Add EEOC to creditor matrix	0.10	70.00
08/18/25	Allison J. McGregor	Call with Aurora to discussing trade vendor	0.80	560.00

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Description of Professional Services Rendered

		issues		
08/19/25	John D. Elrod	Review and revised bar date motions and communication with client regarding same (1.4); communication with A. Chen regarding employee C. Wei's proposed vacation time (.2)	1.60	2,000.00
08/19/25	Allison J. McGregor	Update Proposed Final Orders to Insurance Motion, Cash Management Motion, Tax Motion, Critical Vendor Motion, and Employee Wage Motion	1.90	1,330.00
08/19/25	Allison J. McGregor	Emails with Aurora relating to IDI materials and Second Day Hearings	0.70	490.00
08/19/25	Allison J. McGregor	Draft Motion, Proposed Order, and Notice regarding Bar Date	4.00	2,800.00
08/19/25	Allison J. McGregor	Draft Notice of Suggestion of Pendency of Bankruptcy and Automatic Stay to be filed in Employers Mutual Casualty Company v. Costco Wholesale Corporation, et al., and contact plaintiff's counsel	1.20	840.00
08/20/25	John D. Elrod	Review and revised proposed orders for second day hearings (3.4); negotiations with committee regarding edits to proposed orders (1.0); preparation for second day hearings (2.7)	7.10	8,875.00
08/20/25	Allison J. McGregor	Circulate Agreements needed for IDI for signature	0.70	490.00
08/20/25	Allison J. McGregor	Emails regarding notice of bankruptcy case to employees	0.30	210.00
08/20/25	Allison J. McGregor	Identified deadlines in case to be calendared	0.70	490.00
08/20/25	Allison J. McGregor	Send emails related to bank accounts and second day hearings	0.30	210.00
08/20/25	Allison J. McGregor	Finalize Notice of Proposed Orders, Proposed Orders, and Redline for Employee Wage Motion, Cash Management Motion, Insurance, and Utilities Motion	0.50	350.00
08/20/25	Allison J. McGregor	Review and edit Notices of Proposed Final Orders (0.40); revise proposed second interim DIP Order (0.20)	0.60	420.00
08/20/25	Allison J. McGregor	Emails with J. Elrod regarding DIP Budget	0.30	210.00
08/20/25	Allison J. McGregor	Draft Notice of Proposed Budget	1.20	840.00
08/20/25	Allison J. McGregor	Create Outline for Second Day Hearing	4.30	3,010.00
08/21/25	John D. Elrod	Prepared for and attended second day hearings (8.2); meeting with client (1.5); post-hearing revisions to proposed orders and communication with various constituents regarding same (1.2)	10.90	13,625.00
08/21/25	Allison J. McGregor	Finalize Final Utilities, Employee Wages, Tax, and Cash Management Order for filing (0.60); Revise Cash Management and Insurance Order based on instruction of the Court (0.90); Revise Critical Vendor Order	3.40	2,380.00

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Description of Professional Services Rendered

		based on instruction of the Court and circulate to UST and Committee counsel (1.00); Revise Second Interim DIP Order based on instruction of Court and circulate to parties in interest (0.90)		
08/21/25	Allison J. McGregor	Emails related to Revised Bid Procedures Order	0.70	490.00
08/21/25	Allison J. McGregor	Finalize information needed for and respond to IDI requests	1.50	1,050.00
08/21/25	Ari Newman	Review and revise confidentiality agreement and protective order (.7); correspondence with GT team regarding same (.1).	0.80	940.00
08/22/25	John D. Elrod	Call with client regarding customs issues (.3); review of issues relating to customs and taxes order and communication with client regarding same (.3); communication with various parties regarding proposed orders and case status (.8)	1.40	1,750.00
08/22/25	Nara Heard	Translated, reviewed and forwarded client correspondence to attorney.	0.80	320.00
08/22/25	Allison J. McGregor	Finalize Critical Vendor Order and Bid Procedures Order for uploading (0.40); call with Aurora regarding payment of cleaning service (0.40); research timing of prepetition payment (1.00)	1.80	1,260.00
08/24/25	John D. Elrod	Review and revised committee confidentiality agreement and proposed confidentiality order	1.30	1,625.00
08/24/25	Allison J. McGregor	Identify upcoming deadlines and email S. Fields and J. Elrod with dates that need to be calendared	2.00	1,400.00
08/25/25	Allison J. McGregor	Emails with Aurora and Hilco regarding Retention Applications (0.50); Draft Notice of Hearing for Final DIP Motion (0.30); respond to CLA regarding scheduling a call (0.10); Email Aurora regarding outstanding tasks to be completed (0.40); Email J. Weir regarding filing of notice of suggestion of bankruptcy in Southern District Texas (0.30); emails with S. Fields regarding upcoming deadlines (0.40); Finalize Auction and Sale Notice and confirm proper filing and service (0.90); emails with Aurora regarding loan documents (0.30)	3.20	2,240.00
08/25/25	Allison J. McGregor	Attend call with CLA regarding tax filing for Wellmade	0.10	70.00
08/26/25	Josh Bernstein	Research class issues.	1.10	687.50
08/26/25	John D. Elrod	Communication with counsel for committee regarding protective order issues (.2); revised protective order and motion (1.0); update call with client (1.0); prepared	4.00	5,000.00

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		for and participated in initial debtor interview (1.0); attention to overseas vendor issues (.8)		
08/26/25	Philip J. George	Review draft consent order.	0.10	88.00
08/26/25	Allison J. McGregor	Email Verita Auction and Sale Notice for service and publication (0.10); email UST with documents for IDI Meeting (0.10)	0.20	140.00
08/27/25	Josh Bernstein	Research class certification and RICO issues.	3.90	2,437.50
08/27/25	John D. Elrod	Call with client regarding case issues (.3); call with AHF's counsel regarding vendor issues (.1); review of emails from team and opposing counsel regarding case issues (.8)	1.20	1,500.00
08/27/25	Nara Heard	Preparing and Finalizing Application for Jake Evans to be admitted to U.S. Bankruptcy Court for Northern Georgia.	1.10	440.00
08/27/25	Allison J. McGregor	Draft Ordinary Course Professionals Motion	1.30	910.00
08/27/25	Allison J. McGregor	Review and respond to emails from Aurora regarding outstanding items (0.90); emails regarding service of sale notice (0.40); emails regarding retention order (0.20); review emails regarding status of DIP and APA (0.40); email regarding filing of Notice of Pendency of Bankruptcy in S.D. Tex Case (0.20)	2.10	1,470.00
08/28/25	Philip J. George	Review motion to stay.	0.20	176.00
08/28/25	Irina Khasin	Draft narrative summary of execution of search warrant	0.30	262.50
08/28/25	Allison J. McGregor	Draft notice of proposed order and agenda (1.00); Attend call with aurora to discuss disclosure schedules (0.60); Draft Notice of Modified Proposed Order (0.30); Revise Proposed Final DIP Order (0.90); Revise Amended and Restated DIP Credit Agreement (1.00)	3.80	2,660.00
08/29/25	John D. Elrod	Calls with client regarding US Trustee fee issues (.2); communication with various creditors regarding warranty claims (.3)	0.50	625.00
08/29/25	Allison J. McGregor	Circulate and finalize revisions to DIP Order and Credit Agreement (0.70); emails with UST regarding critical vendor payments (0.10); email aurora regarding employee list for notice of bankruptcy (0.20); Revise and Finalize DIP Order (0.30); Revise Sale and Auction Notice (0.20); research amounts to be considered in determining UST fee (1.10); emails regarding former employee contact information (0.40)	3.00	2,100.00

Total Hours: 132.30

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Description of Professional Services Rendered

Total Amount: \$ 111,293.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP007.

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	35.30	1,250.00	44,125.00
Irina Khasin	0.30	875.00	262.50
Ari Newman	0.80	1,175.00	940.00
Josh Bernstein	5.00	625.00	3,125.00
Gerond J. Lawrence	6.20	835.00	5,177.00
Allison J. McGregor	78.80	700.00	55,160.00
Philip J. George	0.30	880.00	264.00
Nara Heard	5.60	400.00	2,240.00
Totals:	132.30	841.22	\$ 111,293.50

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Description of Professional Services Rendered

TASK CODE: AIRP009 CORPORATE GOVERNANCE AND BOARD MATTERS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/25	Brian J. Landau	Analyze and revise draft NDA for proposed sale	0.30	232.50
			Total Hours:	0.30
			Total Amount:	\$ 232.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP009.

CORPORATE GOVERNANCE AND BOARD MATTERS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Brian J. Landau	0.30	775.00	232.50
Totals:	0.30	775.00	\$ 232.50

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Description of Professional Services Rendered

TASK CODE: AIRP011 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/25	John D. Elrod	Attention to retention applications for Aurora, GT, and Hilco	0.40	500.00
08/12/25	Alison Franklin	Draft application to employ Hilco Corporate Finance, LLC as Debtors' investment banker	0.50	637.50
08/12/25	Alison Franklin	Draft application to employ Greenberg Traurig as Debtors' counsel	0.80	1,020.00
08/13/25	Alison Franklin	Continue to draft application to employ Greenberg Traurig as Debtors' counsel	2.50	3,187.50
08/13/25	Alison Franklin	Continue to draft application to employ Hilco Corporate Finance, LLC as Debtors' investment banker	1.30	1,657.50
08/13/25	Alison Franklin	Draft application to retain Aurora Management Partners Inc. to provide certain additional personnel and designate David M. Baker as Chief Restructuring Officer for the Debtors)	0.80	1,020.00
08/14/25	John D. Elrod	Review and revised GT retention application	1.00	1,250.00
08/14/25	Alison Franklin	Review, revise and finalize application to employ Greenberg Traurig as Debtors' counsel (0.3); correspond with A. McGregor regarding same (0.1)	0.40	510.00
08/14/25	Alison Franklin	Review, revise and finalize application to employ Hilco Corporate Finance, LLC as Debtors' investment banker (3.5); correspond with A. McGregor regarding same (0.2)	3.70	4,717.50
08/14/25	Alison Franklin	Review, revise and finalize application to retain Aurora Management Partners Inc. to provide certain additional personnel and designate David M. Baker as Chief Restructuring Officer for the Debtors (4.8); correspond with A. McGregor regarding same (0.1)	4.90	6,247.50
08/14/25	Allison J. McGregor	Revise Application to Employ GT as Counsel	2.50	1,750.00
08/15/25	Allison J. McGregor	Revise retention applications	0.30	210.00
08/19/25	John D. Elrod	Review and revised Aurora retention application (2.1); review and revised Hilco retention application (2.0)	4.10	5,125.00
08/21/25	John D. Elrod	Call with Venable regarding potential ordinary course retention	0.20	250.00
08/22/25	Alison Franklin	Work on motion to approve procedures for retention and payment of ordinary course professionals	0.50	637.50
08/24/25	John D. Elrod	Review and revised GT retention	3.50	4,375.00

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08/25/25	John D. Elrod	application Revised GT application to employ (.3); review of Hilco edits to retention application (.3); call with potential ordinary course professional CLA regarding potential OCP treatment (.2)	0.80	1,000.00
08/26/25	John D. Elrod	Finalized and filed retention applications	2.20	2,750.00
08/27/25	Allison J. McGregor	Revise Proposed Order Approving Retention Application for GT, Aurora, and Hilco	2.00	1,400.00
			Total Hours:	32.40
			Total Amount:	\$ 38,245.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP011.

FEE/EMPLOYMENT APPLICATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	12.20	1,250.00	15,250.00
Alison Franklin	15.40	1,275.00	19,635.00
Allison J. McGregor	4.80	700.00	3,360.00
Totals:	32.40	1,180.40	\$ 38,245.00

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Description of Professional Services Rendered

TASK CODE: AIRP013 FINANCING/CASH COLLECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/25	John D. Elrod	Review of proposed final FIP financing order (2.2); communication with counsel for DIP lender regarding potential adjournment of final DIP hearing (.2)	2.40	3,000.00
08/20/25	John D. Elrod	Call with counsel for Summit regarding second interim DIP order (.2); drafted second interim DIP order (1.0)	1.20	1,500.00
08/24/25	John D. Elrod	Review of upsized DIP proposal from Summit	0.40	500.00
08/25/25	John D. Elrod	Call with counsel for DIP lender (.2); review of emails from committee, DIP lender, and AHF's counsel regarding final DIP hearing (.5); call with T. Stratton regarding status of DIP (.2); call with A. Jowers regarding DIP and cash collateral issues (.2); call with B. Sandler regarding DIP and committee budget issues (.2)	1.30	1,625.00
08/27/25	John D. Elrod	Drafted final DIP order (3.2); negotiations with counsel for AHF, Summit, and Committee regarding upsized DIP (.5)	3.70	4,625.00
08/27/25	Ari Newman	Review UCC comments to Final DIP Order and correspondence regarding same.	0.40	470.00
08/28/25	John D. Elrod	Negotiations regarding DIP loan upsizing (.5); review and revised proposed final DIP order (.7); review of draft amended credit agreement (.2); attention to budget and communication with client regarding same (.4)	1.80	2,250.00
08/28/25	Ari Newman	Revise DIP Order regarding additional draw (.3); correspondence and calls regarding DIP issues (.3); review amended DIP credit agreement (.2); review documents for submission to the court (.2); review debt calculation and correspondence with Prepetition Lender regarding debt calculation (.3).	1.30	1,527.50
08/29/25	John D. Elrod	Prepared for and attended final DIP hearing (5.1); attention to post-hearing submission of proposed order (.2)	5.30	6,625.00
08/29/25	Ari Newman	Review revised budget (.2); correspondence regarding DIP and budget matters (.2); review revisions to DIP credit agreement and final DIP order (.2).	0.60	705.00

Total Hours: 18.40

Total Amount: \$ 22,827.50

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Description of Professional Services Rendered

TIMEKEEPER SUMMARY FOR TASK CODE AIRP013,

FINANCING/CASH COLLECTIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	16.10	1,250.00	20,125.00
Ari Newman	2.30	1,175.00	2,702.50
Totals:	18.40	1,240.63	\$ 22,827.50

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TASK CODE: AIRP014 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION MOTIONS)

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/25	Nara Heard	Draft two Notices of Suggestions of Pendency of Bankruptcy & Automatic Stay of Proceedings.	0.70	280.00
08/05/25	Philip J. George	Revise notices of bankruptcy.	0.30	264.00
08/05/25	Nara Heard	Finalize Notices of Suggestions of Pendency of Bankruptcy & Automatic Stay of Proceedings.	0.40	160.00
08/08/25	Nara Heard	Amend Draft Notice of Suggestion Pendency of Bankruptcy & Automatic Stay Proceedings.	0.30	120.00
08/08/25	Nara Heard	Finalize and File Notice of Suggestion Pendency & Automatic Stay Proceedings.	0.40	160.00
08/24/25	Philip J. George	Review motion to stay litigation.	0.20	176.00
08/26/25	Philip J. George	Review and revise draft motion to stay.	0.30	264.00
08/26/25	Gail L. Jamrok	Review and edit notice of suggestion of bankruptcy and pendency of automatic stay (.3); prepare notice for filing in the Southern District of Texas case and file notice electronically (.4).	0.70	392.00
08/26/25	Jared Weir	Prepare suggestion of bankruptcy for case pending in S.D. Texas.	0.20	249.00
08/27/25	Philip J. George	Review and revise motion to stay and motion for extension.	0.30	264.00
08/29/25	Philip J. George	Draft letter to opposing counsel regarding weakness of their claims, and perform research regarding claims for same.	2.80	2,464.00
Total Hours:			6.60	
Total Amount:				\$ 4,793.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP014.

OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION MOTIONS)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jared Weir	0.20	1,245.00	249.00
Philip J. George	3.90	880.00	3,432.00
Nara Heard	1.80	400.00	720.00
Gail L. Jamrok	0.70	560.00	392.00
Totals:	6.60	726.21	\$ 4,793.00

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Description of Professional Services Rendered

TASK CODE: AIRP015 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/25	Allison J. McGregor	Attend Call with Committee Counsel and Take Notes	0.30	210.00
			Total Hours:	0.30
			Total Amount:	\$ 210.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP015.

MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	0.30	700.00	210.00
Totals:	0.30	700.00	\$ 210.00

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Description of Professional Services Rendered

TASK CODE: AIRP022 HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/25	Allison J. McGregor	Prepare for and Attend Hearing	2.40	1,680.00
08/06/25	Ari Newman	Attend first day hearing.	1.80	2,115.00
08/21/25	Allison J. McGregor	Prepare for Second First Day Hearing	1.00	700.00
08/21/25	Allison J. McGregor	Attend and present at second first day hearing	2.00	1,400.00
08/21/25	Ari Newman	Attend second day and bidding procedures hearing.	1.00	1,175.00
08/29/25	Allison J. McGregor	Attend final DIP Hearing	0.50	350.00
08/29/25	Ari Newman	Attend DIP hearing (.3).	0.30	352.50

Total Hours: 9.00

Total Amount: \$ 7,772.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP022.

HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Ari Newman	3.10	1,175.00	3,642.50
Allison J. McGregor	5.90	700.00	4,130.00
Totals:	9.00	863.61	\$ 7,772.50

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	114.10	1,250.00	142,625.00
Jake C. Evans	18.40	850.00	15,640.00
Alison Franklin	15.40	1,275.00	19,635.00
Irina Khasin	0.30	875.00	262.50
Ari Newman	27.20	1,175.00	31,960.00
Michael Slocum	2.70	950.00	2,565.00
Jared Weir	0.20	1,245.00	249.00
David R. Yates	4.20	1,135.00	4,767.00
Josh Bernstein	5.00	625.00	3,125.00
Brian J. Landau	0.30	775.00	232.50
Gerond J. Lawrence	6.20	835.00	5,177.00
Allison J. McGregor	90.20	700.00	63,140.00
Philip J. George	10.20	880.00	8,976.00
Nara Heard	7.40	400.00	2,960.00
Gail L. Jamrok	0.70	560.00	392.00
Totals:	302.50	997.38	\$ 301,706.00

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
07/21/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095908322 DATE: 7/31/2025 Lexis Charges: July 1 - July 31 2025	\$ 91.78
08/02/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095962341 DATE: 8/31/2025 Lexis Charges: August 1 - August 31 2025	\$ 21.37
08/04/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00081025229 DATE: 8/10/2025 Chapter 11 filing for Wellmade Industries MFR. N.A LLC ; Courts/Usbc-Ga-N on 8/4/2025 (Unique ID# 794HE1K2Y49SG9QRTE)	\$ 1,738.00
08/04/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00081025229 DATE: 8/10/2025 Chapter 11 filing for Wellmade Floor Coverings International, Inc.; Courts/Usbc-Ga-N on 8/4/2025 (Unique ID# MCXBS14RW246G9CPAW)	\$ 1,738.00
08/05/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095962341 DATE: 8/31/2025 Lexis Charges: August 1 - August 31 2025	\$ 64.10
08/05/25	WestlawNext Research by NARA HEARD on 08/05/2025 - Re: 217339.011300	\$ 304.00
08/08/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00081025229 DATE: 8/10/2025 Wellmade filing of Bid Procedures Motion; Courts/Usbc-Ga-N on 8/8/2025 (Unique ID# GAMHA1HAS4AXGCJ6WC)	\$ 199.00
08/29/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095962341 DATE: 8/31/2025 Lexis Charges: August 1 - August 31 2025	\$ 128.20
Total Expenses:		\$ 4,284.45



Invoice No. : 1001168990
File No. : 217339.012900
Bill Date : October 13, 2025

Wellmade Industries MFR, N.A.
P.O. Box 52897
Atlanta, GA 30355

Attn: David Baker

INVOICE

Re: Chapter 11 Bankruptcy

Legal Services through September 30, 2025:

Asset Analysis and Recovery:	\$	20,891.50
Asset Disposition:	\$	53,466.00
Business Operations:	\$	1,108.00
Case Administration:	\$	44,419.50
Claims Administration and Objections:	\$	53,771.00
Fee/Employment Applications:	\$	3,295.00
Other Contested Matters (excluding assumption/rejection motions):	\$	14,420.00
Meetings of and Communications with Creditors:	\$	7,415.00
Reporting:	\$	2,625.00
Hearings:	\$	2,450.00
Schedules and Statements:	\$	31,010.00

Total Fees: \$ 234,871.00

Expenses:

Filing Fees	267.00
Local Travel	65.90
UPS Charges	22.50
Information and Research	587.58

Total Expenses: \$ 942.98

JCE:MM



Invoice No. : 1001168990
File No. : 217339.012900

Current Invoice: \$ 235,813.98

Previous Balance (see attached statement): \$ 305,990.45

Total Amount Due: \$ 541,804.43

JCE:MM



Invoice No. : 1001168990
File No. : 217339.012900

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/03/25	1001155422	301,706.00	4,284.45	0.00	305,990.45
	Totals:	\$ 301,706.00	\$ 4,284.45	\$ 0.00	\$ 305,990.45

JCE:MM

Invoice No.: 1001168990
Matter No.: 217339.012900

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Description of Professional Services Rendered:

TASK CODE: AIRP001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/25	Jake C. Evans	Conferences re matter status, bids and next steps in BK process (0.3); emails on same (0.2).	0.50	425.00
09/01/25	Philip J. George	Continue to draft letter to opposing counsel regarding claims.	0.70	616.00
09/02/25	Jake C. Evans	Conference re APA.	0.40	340.00
09/02/25	Philip J. George	Draft motion to opposing counsel regarding weakness of claims (0.6), and communications regarding motion to stay (0.6).	1.20	1,056.00
09/02/25	Sandy King	Detailed case status review	0.20	87.00
09/03/25	Jake C. Evans	Review and consider counter-offer to AHF (0.1); conference on same (0.2).	0.30	255.00
09/03/25	Philip J. George	Continue to draft letter to opposing counsel regarding claims (0.4), and perform research for same (0.3).	0.70	616.00
09/04/25	Jake C. Evans	Prepare for and participate on status update internal call (0.3); debrief and generate next steps on same (0.3).	0.60	510.00
09/04/25	Jake C. Evans	Review emails and documents re worker's compensation claim and generate strategy in light of potential subrogation claim against Wellmade (0.3); review email on new staffing company and considerations on same (0.3).	0.60	510.00
09/04/25	Philip J. George	Revise letter to opposing counsel regarding weakness of claims and upcoming call.	0.50	440.00
09/04/25	Michael Slocum	Revise draft letter to adversary regarding defenses and potential settlement discussions	0.50	475.00
09/05/25	Jake C. Evans	Prepare for and participate in call with opposing counsel for settlement purposes (0.5); debrief and generate next steps on same (0.5).	1.00	850.00
09/05/25	Philip J. George	Participate in call with opposing counsel in bankruptcy regarding potential settlement and communications regarding same.	0.90	792.00
09/07/25	Jake C. Evans	Emails re tax abatement (0.1); review documents on same (0.2).	0.30	255.00
09/08/25	Jake C. Evans	Emails and conference re tax abatement and status of same.	0.30	255.00
09/08/25	Philip J. George	Review agreements between plaintiffs and employer.	0.40	352.00
09/08/25	Michael Slocum	Review and evaluate letter from adversary regarding settlement discussions and related issues	0.30	285.00

Invoice No.: 1001168990
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Description of Professional Services Rendered

09/09/25	Jake C. Evans	Review opposing counsel's demand for information, consider same and draft accompanying emails.	0.30	255.00
09/09/25	Philip J. George	Communications regarding letter received from plaintiffs' counsel.	0.10	88.00
09/10/25	Philip J. George	Email communications regarding analysis of claims.	0.10	88.00
09/11/25	Jake C. Evans	Emails and considerations of debtor's stay of bar date on proof of claim.	0.30	255.00
09/11/25	Jake C. Evans	Internal team conference on matter status and next steps (.5); debrief and generate next steps on same (.5).	1.00	850.00
09/11/25	Philip J. George	Call with counsel for individual defendants regarding communications with plaintiffs' counsel and demands for discovery.	0.50	440.00
09/11/25	Michael Slocum	Further emails with client regarding status of settlement discussions and related issues	0.20	190.00
09/12/25	Jake C. Evans	Conferences re AHF \$58.5 million dollar offer, strategy on same (0.5), and conference with A. Chen on considerations (0.5).	1.00	850.00
09/16/25	Jake C. Evans	Conferences re considerations on AHF offer, class action case status and generate next steps on same.	0.70	595.00
09/16/25	Philip J. George	Communications with N. Weinrich and opposing counsel regarding status of settlement discussions.	0.10	88.00
09/17/25	Jake C. Evans	Review of executed purchase agreement and conferences on same, including on bid cancellation.	0.30	255.00
09/17/25	Philip J. George	Review agreements and contracts for case background and defense.	0.50	440.00
09/18/25	Philip J. George	Review information provided on background and factual support for defenses.	0.10	88.00
09/19/25	Jake C. Evans	Conference re status of transaction, next matter steps and action items for execution of same.	0.30	255.00
09/19/25	Jake C. Evans	Conference with accountant re final tax filing and timing of same.	0.50	425.00
09/19/25	Philip J. George	Email communications regarding case statuses and preparation for upcoming team call.	0.10	88.00
09/21/25	Jake C. Evans	Review emails re case status and strategy on same and generate next case steps.	0.40	340.00
09/21/25	Philip J. George	Communications regarding preparation for team meeting regarding case statuses.	0.20	176.00
09/22/25	Jake C. Evans	Client team conference re case status and strategy for dismissal (0.6); generate next steps on same (0.6).	1.20	1,020.00
09/22/25	Philip J. George	Attend team call to discuss case status and strategy,	1.40	1,232.00
09/22/25	Michael Slocum	Video-call with client regarding status,	1.40	1,330.00

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Description of Professional Services Rendered

09/23/25	Philip J. George	strategy, and related issues Email communications regarding opposing counsel's stipulation to extend answer and arguments for potential motion to dismiss.	0.10	88.00
09/23/25	Michael Slocum	Emails with client regarding defense strategy issues	0.20	190.00
09/24/25	Jake C. Evans	Draft emails re strongest substantive defenses and assess same.	0.50	425.00
09/24/25	Philip J. George	Internal email communications regarding best substantive arguments as defenses and effect of same.	0.10	88.00
09/24/25	Michael Slocum	Prepare brief email memorandum regarding substantive defense strategies	0.40	380.00
09/26/25	Jake C. Evans	Draft and revise email re strongest defense and generate next steps.	0.20	170.00
09/26/25	George Qi	Translate the language per J. Elrod's request.	0.10	138.50
09/28/25	Jake C. Evans	Conference re update on matters, including private being confirmed, defense of civil complaints and other outstanding matters.	0.40	340.00
09/29/25	Jake C. Evans	Conference re AHF conference with HR and considerations for subcontractor and verification of immigration status.	0.50	425.00
09/29/25	Jake C. Evans	Emails re employer of plaintiffs and source of same.	0.20	170.00
09/30/25	Jake C. Evans	Emails re needed evidence to bolster defense.	0.20	170.00
09/30/25	Philip J. George	Email communications regarding categories of documents necessary for defense.	0.10	88.00
09/30/25	Sandy King	Detailed case status review and status on all deadlines.	0.20	87.00
09/30/25	Michael Slocum	Further emails with client regarding fact investigation and related issues	0.70	665.00

Total Hours: 24.00

Total Amount: \$ 20,891.50

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Description of Professional Services Rendered

TIMEKEEPER SUMMARY FOR TASK CODE AIRP001.

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jake C. Evans	12.00	850.00	10,200.00
George Qi	0.10	1,385.00	138.50
Michael Slocum	3.70	950.00	3,515.00
Philip J. George	7.80	880.00	6,864.00
Sandy King	0.40	435.00	174.00
Totals:	24.00	870.48	\$ 20,891.50

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Description of Professional Services Rendered

TASK CODE: AIRP002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/25	John D. Elrod	Calls with AHF and client regarding private sale option (.8); call with committee counsel regarding sale issues (.5)	1.30	1,625.00
09/02/25	John D. Elrod	Call with committee regarding APA issues (.8); follow up items relating to same (.8)	1.60	2,000.00
09/02/25	Ari Newman	Correspondence regarding various sale issues.	0.40	470.00
09/02/25	David R. Yates	Attention to updated amended and restated APA (0.5); Attention to updated disclosure schedules and circulate same to client (0.6); Conference call with counsel for unsecured creditors (0.6).	1.70	1,929.50
09/03/25	John D. Elrod	Review of private sale offer from AHF (.2); prepared for and participated in call with client regarding disclosure schedules (1.1); revised disclosure schedules (.4)	1.70	2,125.00
09/03/25	Ari Newman	Call with client regarding various sale issues, including Disclosure Schedules and related items (1.1); review revised Disclosure Schedules (.5); correspondence with Buyer's counsel regarding various sale matters (.3); discussion with J. Elrod regarding various sale items (.2).	2.10	2,467.50
09/03/25	David R. Yates	Correspondence (multiple) with Che Carrasquillo regarding APA and schedules (0.5); Video conference with client team regarding amended and restated APA and updates to disclosure schedules (1.0); Preparation of revised/updated disclosure schedules and circulate same to the working group (0.6); Related review of amended and restated APA (0.6).	2.70	3,064.50
09/04/25	John D. Elrod	Prepared for and participated in call with Hilco regarding sale issues (2.0); call with client regarding AHF offer (.3); communication with AHF regarding offer issues (.4); attention to amended asset purchase agreement issues (1.0); attention to I4F assignment issues and communication with I4F and AHF regarding same (1.0)	4.70	5,875.00
09/04/25	Ari Newman	Correspondence regarding assumption and assignment (.2); call with J. Elrod regarding APA matters (.3).	0.50	587.50
09/04/25	David R. Yates	Attention to disclosure schedules and related review of purchase agreement (0.8); Correspondence (multiple) with Aurora	1.60	1,816.00

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Description of Professional Services Rendered

		team (0.8).		
09/05/25	John D. Elrod	Call with client regarding private sale response (.2); negotiations with AHF (.3); attention to APA and ancillary document issues (.8)	1.30	1,625.00
09/05/25	Ari Newman	Correspondence regarding sale issues and contract assumption (.5).	0.50	587.50
09/07/25	John D. Elrod	Negotiations with counsel for AHF	0.40	500.00
09/08/25	John D. Elrod	Attention to sale issues and communication with client regarding same (.7); attention to execution of amended and restated APA (.3); communication with counsel for AHF regarding potential private sale issues (.4); communication with client and counsel for AHF regarding executory contract issues (.4); review of EPA's draft language for sale order (.2)	2.00	2,500.00
09/08/25	Ari Newman	Correspondence regarding sale issues and APA status.	0.20	235.00
09/09/25	John D. Elrod	Review of private sale offer from AHF (.2); call with AHF (.4); call with T. Stratton regarding sale issues (.2)	0.80	1,000.00
09/10/25	John D. Elrod	Call with client on private sale issues (.3); call with client regarding sources and uses and review of same (.4); call with E. Xiao regarding questions from bidders (.2); prepared for and participated in call with D. Baker and A. Chen regarding sale options (2.1); call with D. Baker regarding AHF sale issues (.2); negotiations with A. Jowers (.5)	3.70	4,625.00
09/11/25	John D. Elrod	Review of revised APA from AHF (.3); update call with Hilco (.3); calls with client regarding private sale (.5)	1.10	1,375.00
09/12/25	John D. Elrod	Call with client regarding AHF strategy (.4); review of second amended APA (2.2); call with AHF (.5)	3.10	3,875.00
09/12/25	Ari Newman	Review Second Amended and Restated APA (.5); correspondence with GT team regarding same (.4).	0.90	1,057.50
09/15/25	John D. Elrod	Negotiated and drafted second amended APA and communication with client regarding same	0.80	1,000.00
09/15/25	Ari Newman	Correspondence with J. Elrod regarding Second A&R APA; review comments to Second A&R APA;	0.60	705.00
09/17/25	John D. Elrod	Drafted notice of cancellation of auction (.5); review of edits from AHF (.2); communication with committee regarding cancellation of auction (.2); communication with Hilco regarding auction cancellation and communication with potential buyers (.3); updated AHF regarding covenant	1.90	2,375.00

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Description of Professional Services Rendered

		issues (.2); communication with AHF regarding additional sale issues (.5)		
09/17/25	David R. Yates	Attention to transition services agreement.	0.80	908.00
09/18/25	David R. Yates	Review and comment on draft transition services agreement and related correspondence with working group.	1.80	2,043.00
09/19/25	Ari Newman	Review correspondence from purchaser regarding media inquiries and other issues.	0.20	235.00
09/23/25	John D. Elrod	Attention to sale and sale hearing issues	1.20	1,500.00
09/25/25	John D. Elrod	Prepared for and participated in call with AHF (2.0); review and revised private sale motion, order, and support Stratton declaration (2.1)	4.10	5,125.00
09/26/25	Ari Newman	Review revision to Sale Order and related correspondence.	0.20	235.00
Total Hours:			43.90	
			Total Amount:	\$ 53,466.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP002.

ASSET DISPOSITION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	29.70	1,250.00	37,125.00
Ari Newman	5.60	1,175.00	6,580.00
David R. Yates	8.60	1,135.00	9,761.00
Totals:	43.90	1,217.90	\$ 53,466.00

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Description of Professional Services Rendered

TASK CODE: AIRP006 BUSINESS OPERATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/25	Allison J. McGregor	Emails with Aurora relating to closing of certain prepetition bank accounts	0.40	280.00
09/23/25	Jake C. Evans	Emails and conferences re signing Koval agreement with CPA firm and generate next steps on same.	0.30	255.00
09/30/25	Jake C. Evans	Conference with M. Thompson and W. White re immigration inquiries and next steps on same.	0.30	255.00
09/30/25	Miriam C. Thompson	Telephone call and email correspondence with Waleska White re immigration compliance for contractors and contract clauses for staffing company agreements to affirm compliance	0.40	318.00
			Total Hours:	1.40
			Total Amount:	\$ 1,108.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP006,

BUSINESS OPERATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Jake C. Evans	0.60	850.00	510.00
Miriam C. Thompson	0.40	795.00	318.00
Allison J. McGregor	0.40	700.00	280.00
Totals:	1.40	791.43	\$ 1,108.00

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Description of Professional Services Rendered

TASK CODE: AIRP007 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/25	Allison J. McGregor	Emails with Hilco and Aurora regarding information needed for service (0.40); reach out to third party contractor agencies to get addresses of former contractors that worked for Wellmade (0.70); emails with client regarding additional contact information needed for employees and independent contractors (0.10)	1.20	840.00
09/02/25	Paul B. Ranis	Analyze WARN Act issues and confirm strategy.	0.30	277.50
09/03/25	Allison J. McGregor	Attend call with Aurora to discuss disclosure schedules and other case operations	1.10	770.00
09/03/25	Allison J. McGregor	Emails with aurora and client regarding vendors preference concerns related to ordinary course post petition payment	0.40	280.00
09/05/25	Allison J. McGregor	Emails with Aurora regarding bank accounts (0.10); Email with Aurora regarding contract counter party list and service information (0.10)	0.20	140.00
09/07/25	John D. Elrod	Attention to MTS issues and communication with client regarding same (.5); attention to schedules and SOFAs (.2)	0.70	875.00
09/07/25	Allison J. McGregor	Email Aurora re 503(b)(9) payments (0.10); create list of former employees and contractors who need notice of bankruptcy (2.80);	2.90	2,030.00
09/08/25	John D. Elrod	Review of proposed edits to bar date order (.3); discussion with client regarding same (.2); communication with counsel for committee regarding same (.2); review of draft Global Notes to schedules and edited same (1.0)	1.70	2,125.00
09/08/25	Allison J. McGregor	Create list of former employees and independent contractors that need notice of bankruptcy and send to Verita for notice and service purposes	1.50	1,050.00
09/09/25	John D. Elrod	Negotiations with counsel for MTS (.7); updated client regarding same (.5)	1.20	1,500.00
09/09/25	Allison J. McGregor	Draft Notice of Hearing and revise proposed order for Ordinary Course Professionals Motion	0.90	630.00
09/10/25	Allison J. McGregor	Review closed bank account information	0.80	560.00
09/11/25	Allison J. McGregor	Research class certification in bankruptcy	1.80	1,260.00
09/11/25	Allison J. McGregor	Emails with Verita regarding certificate of service	0.20	140.00
09/12/25	Allison J. McGregor	Call with Aurora to discuss outstanding	0.30	210.00

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Description of Professional Services Rendered

09/12/25	Allison J. McGregor	issues of bankruptcy case Create Cure Schedule for Notice of Assumption and Assignment of certain executory contracts and leases	1.90	1,330.00
09/12/25	Allison J. McGregor	Research on whether soliciting claimants would be a violation of the automatic stay and draft summary of findings	6.20	4,340.00
09/12/25	Allison J. McGregor	Send Excel Version of Schedules to Verita for their records and service	0.50	350.00
09/14/25	Allison J. McGregor	Update list of former independent contractors that needed to be served and provide list to Verita (0.30); email J. Elrod and Aurora outlining efforts made to obtain addresses for all former independent contractors and employees (0.70)	1.00	700.00
09/15/25	Allison J. McGregor	Emails with Aurora regarding reporting of budget variances	0.40	280.00
09/16/25	Steven J. Rosenwasser	Review objection to notice and exhibits thereto including declarations and class action complaint (0.9 hours); review objection to class exemplar provided by Elrod to obtain context to class claims in bankruptcy (0.3 hours).	1.20	1,380.00
09/18/25	Rick Bold	Review background materials.	0.60	540.00
09/18/25	Allison J. McGregor	Email J. Elrod regarding need for amended notice of hearing for Bar Date Motion	0.10	70.00
09/19/25	Rick Bold	Review background materials (0.9); participate in strategy call with J. Elrod and S. Rosenwasser (0.5).	1.40	1,260.00
09/19/25	Steven J. Rosenwasser	Call with J. Elrod and R. Bold regarding strategy.	0.50	575.00
09/22/25	Allison J. McGregor	Review Bidding Procedures Order to determine if service of notice of cancellation of action is necessary (0.30); review and email J. Elrod regarding critical vendor/503(b)(9) list (0.30)	0.60	420.00
09/22/25	Allison J. McGregor	Review Monthly Operating Reports	0.70	490.00
09/23/25	Allison J. McGregor	Research proper procedure for asking court for continuance	0.40	280.00
09/23/25	Allison J. McGregor	Draft Supplement Sale Motion and Notice of Continued Sale Hearing	7.80	5,460.00
09/24/25	Allison J. McGregor	Review revised Private Sale Motion and send to client and counsel for buyer and committee for their review	0.60	420.00
09/24/25	Allison J. McGregor	Review and Revise Proposed Sale Order	5.60	3,920.00
09/25/25	John D. Elrod	Prepared for and participated in negotiations with B. Sandler regarding private sale and claims bar date issues (.4); communication with Verita regarding proof of claim filing portal for english and mandarin claims (.3); call with counsel for Oracle (.2)	0.90	1,125.00
09/25/25	Allison J. McGregor	Draft Stratton Sale Declaration	2.30	1,610.00

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Description of Professional Services Rendered

09/26/25	Allison J. McGregor	Draft Agenda for 9/29 Hearing (1.10); Finalize Sale Motion Documents for filing	2.20	1,540.00
09/29/25	Allison J. McGregor	(0.90); draft amended notice of hearing Emails with Aurora regarding payment of	0.10	70.00
09/29/25	Allison J. McGregor	tax professionals Draft summary of hearing, review our	2.30	1,610.00
		notes regarding service on certain		
		individuals court asked about, email list of		
		proposed next steps based on courts		
		instructions at hearing		
09/29/25	Allison J. McGregor	Draft Revised Proposed Bar Date Order	1.70	1,190.00
		and Notice Based on Courts Instructions at		
		Hearing		
09/29/25	Diego Sasias Arroyo	Translation into Spanish	0.20	112.00
09/30/25	Allison J. McGregor	Email Aurora regarding tax returns and	1.70	1,190.00
		ordinary course professionals		
09/30/25	Allison J. McGregor	Call with Aurora to discuss next steps	0.40	280.00
		based on court instructions at bar date		
		motion hearing		
09/30/25	Allison J. McGregor	Draft Cover Letter to be sent to third party	1.70	1,190.00
		staffing agencies regarding service of bar		
		date		
			Total Hours:	58.20
			Total Amount:	\$ 44,419.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP007.

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Rick Bold	2.00	900.00	1,800.00
John D. Elrod	4.50	1,250.00	5,625.00
Paul B. Ranis	0.30	925.00	277.50
Steven J. Rosenwasser	1.70	1,150.00	1,955.00
Allison J. McGregor	49.50	700.00	34,650.00
Diego Sasias Arroyo	0.20	560.00	112.00
Totals:	58.20	763.22	\$ 44,419.50

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Description of Professional Services Rendered

TASK CODE: AIRP008 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/25	John D. Elrod	Prepared for and participated in call with counsel for tort claimants (.8); follow up items relating to same (.4); call and email with landlord of Oregon location regarding claim status (.3)	1.50	1,875.00
09/04/25	John D. Elrod	Review of defenses letter to tort claimants	0.50	625.00
09/04/25	John D. Elrod	Review of issues relating to MTS payment dispute, case law relating to same, and communication with client and opposing counsel regarding same	3.70	4,625.00
09/04/25	Allison J. McGregor	Draft Motion to Shorten Time for Bar Date hearing and finalize Bar Date Motion for Filing	2.70	1,890.00
09/05/25	Allison J. McGregor	Email and call chambers to inform them of recent filing of Motion to Shorten Time for Hearing on Bar Date Motion	0.40	280.00
09/06/25	John D. Elrod	Review of issues relating to MTS matter and release of goods from port	4.70	5,875.00
09/12/25	John D. Elrod	Review of emails for committee counsel and A. Halebua regarding claims bar date issues (.4); call with committee counsel regarding bar date (.3); call with J. Evans regarding litigation strategy (.3); research regarding import of automatic stay on counsel's proposed solicitation of claims(.5); prepared for and participated in call regarding Boushra claim (.7)	2.20	2,750.00
09/15/25	John D. Elrod	Review of objections to bar date motion	1.20	1,500.00
09/16/25	John D. Elrod	Researched and reviewed law regarding notice to former employees/contractors in various languages	5.10	6,375.00
09/16/25	William E. Eye	Email correspondence with J. Elrod and S. Rosenwasser regarding class/collective action issue in bankruptcy proceeding (0.5); review related pleadings (1.0).	1.50	1,282.50
09/16/25	Ari Newman	Correspondence regarding class claim.	0.30	352.50
09/17/25	John D. Elrod	Call with client (.3); review of law relating to bar date objections (2.5)	2.80	3,500.00
09/18/25	William E. Eye	Call with S. Rosenwasser regarding litigation strategy.	0.70	598.50
09/19/25	John D. Elrod	Prepared for and participated in litigation call with team	0.90	1,125.00
09/22/25	John D. Elrod	Attention to bar date issues and objections to motions and grounds for same	2.70	3,375.00
09/24/25	John D. Elrod	Review and revised private sale motion	4.20	5,250.00
09/26/25	John D. Elrod	Review and revised reply to tort claimants' objection to bar date motion (2.0); drafted	2.50	3,125.00

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Description of Professional Services Rendered

09/28/25	John D. Elrod	language for notice to workers and circulated same to committee (.5) Call with tort claimants' counsel regarding bar date issues (.5); communication with client regarding same (.3); review and revised testimony for bar date motion hearing (1.0)	1.80	2,250.00
09/29/25	John D. Elrod	Prepared for and attended hearing on motion to establish bar date (5.0); follow up communication with opposing counsel and client regarding same (.6)	5.60	7,000.00
09/29/25	Ari Newman	Correspondence regarding bar date.	0.10	117.50
			<u>Total Hours:</u>	45.10
			<u>Total Amount:</u>	\$ 53,771.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP008,

CLAIMS ADMINISTRATION AND OBJECTIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	39.40	1,250.00	49,250.00
Ari Newman	0.40	1,175.00	470.00
William E. Eye	2.20	855.00	1,881.00
Allison J. McGregor	3.10	700.00	2,170.00
Totals:	45.10	1,192.26	\$ 53,771.00

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Description of Professional Services Rendered

TASK CODE: AIRP011 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/25	John D. Elrod	Review of committee professionals' retention applications	0.50	625.00
09/07/25	Allison J. McGregor	Finalize and upload orders approving retention applications	0.50	350.00
09/08/25	John D. Elrod	Review and revised ordinary course professionals motion (.6); communication with Venable and CLA regarding same (.4); review and revised monthly invoices (.5)	1.50	1,875.00
09/09/25	John D. Elrod	Review of retention orders and communication with professionals regarding same	0.30	375.00
09/09/25	Allison J. McGregor	Review Committee Employment Applications	0.10	70.00
			Total Hours:	2.90
			Total Amount:	\$ 3,295.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP011,

FEE/EMPLOYMENT APPLICATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	2.30	1,250.00	2,875.00
Allison J. McGregor	0.60	700.00	420.00
Totals:	2.90	1,136.21	\$ 3,295.00

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Description of Professional Services Rendered

TASK CODE: AIRP014 OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION MOTIONS)

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/15/25	Allison J. McGregor	Review objection to bar date motion and draft reply	3.40	2,380.00
09/16/25	Allison J. McGregor	Draft Reply in Support of Claims Bar Date Motion	5.20	3,640.00
09/21/25	Allison J. McGregor	Draft Reply to Objections to Bar Date Motion	9.40	6,580.00
09/25/25	Allison J. McGregor	Revise Reply in Support of Bar Date Motion to remove reference to committee objection	1.30	910.00
09/28/25	Allison J. McGregor	Draft direct exam of Che Carrsaquillo for testimony at Bar Date Motion Hearing (1.10); emails with J. Elrod regarding solicitation efforts of Wellmade employees for notice of bar date (0.20)	1.30	910.00
			Total Hours:	20.60
			Total Amount:	\$ 14,420.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP014,

OTHER CONTESTED MATTERS (EXCLUDING ASSUMPTION/REJECTION MOTIONS)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	20.60	700.00	14,420.00
Totals:	20.60	700.00	\$ 14,420.00

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Description of Professional Services Rendered

TASK CODE: AIRP015 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/15/25	John D. Elrod	Prepared for and participated in meeting of creditors	2.00	2,500.00
09/15/25	Allison J. McGregor	Attend and taken notes at 341 meeting (1.50); Type email summary of upcoming deadlines, amendments to schedules, and other questions that arose during 341 meeting (0.90)	2.40	1,680.00
09/22/25	John D. Elrod	Prepared for and attended resumed meeting of creditors	1.30	1,625.00
09/22/25	Allison J. McGregor	Review Bidding Procedures Motion and Order to determine if Private Sale Motion needs to be filed	1.80	1,260.00
09/22/25	Allison J. McGregor	Attend and Take Notes at Continued 341 Meeting	0.50	350.00
			Total Hours:	8.00
			Total Amount:	\$ 7,415.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP015,

MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	3.30	1,250.00	4,125.00
Allison J. McGregor	4.70	700.00	3,290.00
Totals:	8.00	926.88	\$ 7,415.00

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Description of Professional Services Rendered

TASK CODE: AIRP019 REPORTING

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/22/25	John D. Elrod	Review and edited monthly operating reports	2.10	2,625.00
			Total Hours:	2.10
			Total Amount:	\$ 2,625.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP019,

REPORTING

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	2.10	1,250.00	2,625.00
Totals:	2.10	1,250.00	\$ 2,625.00

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Description of Professional Services Rendered

TASK CODE: AIRP022 HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/29/25	Allison J. McGregor	Prepare for, attend, and present at hearing on Bar Date Motion	3.50	2,450.00
			Total Hours:	3.50
			Total Amount:	\$ 2,450.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP022,

HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	3.50	700.00	2,450.00
Totals:	3.50	700.00	\$ 2,450.00

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Description of Professional Services Rendered

TASK CODE: AIRP023 SCHEDULES AND STATEMENTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/07/25	Allison J. McGregor	Draft disclaimers for schedules and sofa	2.80	1,960.00
09/08/25	Allison J. McGregor	Draft Global Notes for Schedules and Statements	4.30	3,010.00
09/09/25	John D. Elrod	Review of initial draft of schedules and SOFAs and communication with client regarding same	1.30	1,625.00
09/09/25	Allison J. McGregor	Review draft of SOFA and email Aurora regarding any changes that needed to be made	0.70	490.00
09/10/25	John D. Elrod	Review of data for schedules and statements of financial affairs (2.1); review and revised Form 426 and Global Notes (2.3); attention to schedules and SOFA preparation issues (.8)	5.20	6,500.00
09/10/25	Allison J. McGregor	Discussions with J. Elrod regarding schedules and other outstanding matters (0.20); Email UST regarding status of schedules and statement (0.30); Draft General Notes to be included in Form 426 (1.10)	1.80	1,260.00
09/11/25	John D. Elrod	Review of finalized schedules and SOFAs and edited same	3.30	4,125.00
09/11/25	Allison J. McGregor	Review WFCI Schedule and Statements and revise Global Notes (4.50); emails with S. Fields and J. Elrod regarding finalizing and filing schedules (0.70)	5.20	3,640.00
09/18/25	Allison J. McGregor	Review Amended Schedules and email with Aurora regarding changes to be made	1.80	1,260.00
09/19/25	John D. Elrod	Review of amended schedules and SOFAs and commented on same	4.20	5,250.00
09/19/25	Allison J. McGregor	Review and revise amended schedules and prepare for filing	2.70	1,890.00
Total Hours:			33.30	
Total Amount:				\$ 31,010.00

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Description of Professional Services Rendered

TIMEKEEPER SUMMARY FOR TASK CODE AIRP023,

SCHEDULES AND STATEMENTS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	14.00	1,250.00	17,500.00
Allison J. McGregor	19.30	700.00	13,510.00
Totals:	33.30	931.23	\$ 31,010.00

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Rick Bold	2.00	900.00	1,800.00
John D. Elrod	95.30	1,250.00	119,125.00
Jake C. Evans	12.60	850.00	10,710.00
Ari Newman	6.00	1,175.00	7,050.00
George Qi	0.10	1,385.00	138.50
Paul B. Ranis	0.30	925.00	277.50
Steven J. Rosenwasser	1.70	1,150.00	1,955.00
Michael Slocum	3.70	950.00	3,515.00
Miriam C. Thompson	0.40	795.00	318.00
David R. Yates	8.60	1,135.00	9,761.00
William E. Eye	2.20	855.00	1,881.00
Allison J. McGregor	101.70	700.00	71,190.00
Diego Sasias Arroyo	0.20	560.00	112.00
Philip J. George	7.80	880.00	6,864.00
Sandy King	0.40	435.00	174.00
Totals:	243.00	966.55	\$ 234,871.00

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 Re: Chapter 11 Bankruptcy
 Matter No.: 217339.012900

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
08/21/25	VENDOR: McGregor, Allison J. INVOICE#: 121855 DATE: 9/4/2025 Parking; 08/21/2025 Wellmade Hearing Expenses 8/21 & 8/29; Merchant: ParkWhiz at US Bankruptcy Court	\$ 17.69
08/27/25	WestlawNext Research by JOSH BERNSTEIN on 08/27/2025 - Re: 217339.012700	\$ 587.58
08/29/25	VENDOR: McGregor, Allison J. INVOICE#: 121855 DATE: 9/4/2025 Parking; 08/29/2025 Wellmade Hearing Expenses 8/21 & 8/29; Merchant: ParkWhiz at US Bankruptcy Court	\$ 16.52
09/04/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00090625332 DATE: 9/6/2025 Trk'ing No. 1Z0049R10196224148 / Next Day Air Commercial from GREENBERG TRAURIG - ATLANTA Jake Evans to Aaron Halegua, PLLC Aaron Halegua on 09/04/2025 - 217339.012700	\$ 22.50
09/19/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00100125396 DATE: 10/1/2025 Wellmade Amended Schedules 25-58764; Courts/Usbc-Ga-N on 9/19/2025 (Unique ID# 1YEQ71LEX6FJGZCC13)	\$ 34.00
09/19/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00100125396 DATE: 10/1/2025 Wellmade Amended Schedules 25-58760 ; Courts/Usbc-Ga-N on 9/19/2025 (Unique ID# MPRNTH83DDPEGZF84W)	\$ 34.00
09/26/25	VENDOR: Wright Express Financial Services Corpor INVOICE#: 00100125396 DATE: 10/1/2025 Wellmade Private Sale Motion; Courts/Usbc-Ga-N on 9/26/2025 (Unique ID# XT83Q1AAH4C2H1WK46)	\$ 199.00
09/29/25	VENDOR: Elrod, John D. INVOICE#: 125868 DATE: 9/29/2025 Personal Car Mileage; 09/29/2025 Wellmade Hearing Expenses 9/29	\$ 14.00
09/29/25	VENDOR: Elrod, John D. INVOICE#: 125868 DATE: 9/29/2025 Parking; 09/29/2025 Wellmade Hearing Expenses 9/29; Merchant: ParkWhiz	\$ 17.69
Total Expenses:		\$ 942.98



Invoice No. : 1001211706
File No. : 217339.012900
Bill Date : November 17, 2025

Wellmade Industries MFR, N.A.
P.O. Box 52897
Atlanta, GA 30355

Attn: David Baker

INVOICE

Re: Chapter 11 Bankruptcy

Legal Services through October 31, 2025:

Asset Disposition:	\$	64,334.00
Assumption/Rejection of Leases and Contracts:	\$	1,050.00
Case Administration:	\$	76,526.50
Claims Administration and Objections:	\$	62,940.00
Employee Benefits/Pensions:	\$	600.00
Fee/Employment Applications:	\$	750.00
Financing/Cash Collections:	\$	1,250.00
Meetings of and Communications with Creditors:	\$	1,750.00
Plan and Disclosure Statement (including Business Plan):	\$	352.50
Reporting:	\$	3,060.00
Hearings:	\$	2,380.00
 Total Fees:	 \$	 214,993.00

Expenses:

Postage	1,360.00
Professional & Legal	313.00
UPS Charges	376.70
Information and Research	4,093.11
 Total Expenses:	 \$ <u>6,142.81</u>
 Current Invoice:	 \$ <u>221,135.81</u>

JCE:MM

Invoice No. : 1001211706
File No. : 217339.012900

Previous Balance (see attached statement): \$ 235,813.98

Total Amount Due: \$ 456,949.79

JCE:MM

Invoice No. : 1001211706
File No. : 217339.012900

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/13/25	1001168990	234,871.00	942.98	0.00	235,813.98
	Totals:	\$ 234,871.00	\$ 942.98	\$ 0.00	\$ 235,813.98

JCE:MM

Invoice No.: 1001211706
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Description of Professional Services Rendered:

TASK CODE: AIRP002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/25	John D. Elrod	Attention to bankruptcy sale issues, including executory contracts	2.70	3,375.00
10/03/25	John D. Elrod	Attention to sale approval issues and review of objections to same (3.3); correspondence with AHF and client regarding access to employee files (.6)	3.90	4,875.00
10/05/25	Allison J. McGregor	Draft Proffer of Dave Baker and Teri STRatton in support of Sale	3.00	2,100.00
10/06/25	John D. Elrod	Review and revised proposed sale order	3.10	3,875.00
10/07/25	John D. Elrod	Attention to sale issues	0.90	1,125.00
10/10/25	John D. Elrod	Attention to sale closing items	1.30	1,625.00
10/13/25	John D. Elrod	Communication with client and AHF regarding sale issues (.6); communication with A. Chen regarding sale issues (.5); attention to closing items (2.1)	3.20	4,000.00
10/14/25	John D. Elrod	Review of TSA and proposed schedule (1.0); call with AHF regarding sale issues (.5); follow up with client regarding various sale items (.8); attention to closing issues (2.2)	4.50	5,625.00
10/14/25	Allison J. McGregor	Call with AHF counsel to discuss outstanding items for closing	0.30	210.00
10/14/25	David R. Yates	Conference call with buyer's counsel (0.5); Attention to services schedule of TSA (0.6).	1.10	1,248.50
10/15/25	John D. Elrod	Communication with AHF and client regarding sale issues	1.30	1,625.00
10/15/25	Allison J. McGregor	Email aurora regarding employee related information to be provided to AHF in light of closing	0.20	140.00
10/17/25	John D. Elrod	Review of closing issues (.6); communication with client regarding IP issues and agreements (.5); review of same (1.0)	2.10	2,625.00
10/20/25	John D. Elrod	Prepared for and participated in call with AHF's counsel regarding sale issues (1.1); follow up with client on sale issues (.5)	1.60	2,000.00
10/20/25	Allison J. McGregor	Call with AHF To discuss outstanding closing items	0.20	140.00
10/20/25	David R. Yates	Status conference call with K&S and client team.	0.50	567.50
10/21/25	John D. Elrod	Attention to sale issues and communication with client and AHF regarding same	1.30	1,625.00
10/21/25	Allison J. McGregor	Emails related to closing items	0.20	140.00
10/21/25	David R. Yates	Attention to TSA and services schedule (0.6); Attention to matters in preparation	1.30	1,475.50

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Description of Professional Services Rendered

		for closing (0.7).		
10/22/25	John D. Elrod	Attention to open sale issues and	1.70	2,125.00
		discussions with team regarding same		
10/22/25	Allison J. McGregor	Review TSA and provide comments	2.80	1,960.00
		thereto		
10/22/25	David R. Yates	Review and assess comments from Aurora	0.80	908.00
		team to the TSA and related services		
		schedule (0.4); Correspondence with Che		
		Carrasquillo regarding same (0.4).		
10/23/25	John D. Elrod	Email communication regarding open sale	1.80	2,250.00
		issues		
10/23/25	David R. Yates	Attention to revised TSA and services	1.20	1,362.00
		schedule and circulate same to K&S (0.6);		
		Attention to closing checklist and other		
		ancillary documents (0.6).		
10/24/25	John D. Elrod	Communication with AHF's counsel	1.50	1,875.00
		regarding closing issues (.3); call with		
		client regarding sale issues (.4); follow up		
		regarding same (.8)		
10/26/25	David R. Yates	Attention to revised TSA and services	0.50	567.50
		schedules and related correspondence with		
		client team.		
10/27/25	John D. Elrod	Attention to TSA issues and call with client	0.50	625.00
		regarding same		
10/27/25	Allison J. McGregor	Call with aurora to discuss revisions of	0.30	210.00
		TSA		
10/27/25	David R. Yates	Correspondence with Aurora team	1.90	2,156.50
		regarding services schedule (0.5); Phone		
		conference with Will Jordan (K&S)		
		regarding closing mechanics and TSA		
		(0.5); Conference call with Aurora team		
		regarding TSA and services schedule (0.5);		
		Follow-up correspondence with W. Jordan		
		(0.4).		
10/28/25	David R. Yates	Correspondence with Aurora team (0.4);	0.70	794.50
		Phone conference with W. Jordan (0.3)		
10/29/25	John D. Elrod	Call with counsel for AHF and AHF	0.50	625.00
		business team regarding scope of TSA		
10/29/25	Allison J. McGregor	Attend call with Aurora and AHF to	0.50	350.00
		discuss TSA		
10/29/25	David R. Yates	Video conference with client team, AHF	3.20	3,632.00
		team, K&S and GT regarding TSA services		
		schedule (1.0); Review and comment on		
		ancillary agreements to the APA (1.0);		
		Phone conference with Will Jordan (K&S)		
		regarding Continuing Employees and		
		related correspondence with client team		
		regarding same (0.6); Attention to matters		
		in preparation for closing (0.6)		
10/30/25	John D. Elrod	Attention to sale transaction closing issues	1.20	1,500.00
10/30/25	David R. Yates	Attention to draft ancillary documents	1.20	1,362.00
		(0.6); Attention to updated open issues list		
		in conjunction with W. Jordan (0.6).		

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10/31/25	John D. Elrod	Prepared for and participated in call with AHF (1.0); call with client regarding post-closing issues (.7); follow up emails regarding same (.3)	2.00	2,500.00
10/31/25	David R. Yates	All hands status call (0.5); Correspondence with Aurora team regarding service schedule (0.5).	1.00	1,135.00
			Total Hours:	56.00
			Total Amount:	\$ 64,334.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP002,

ASSET DISPOSITION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	35.10	1,250.00	43,875.00
David R. Yates	13.40	1,135.00	15,209.00
Allison J. McGregor	7.50	700.00	5,250.00
Totals:	56.00	1,148.82	\$ 64,334.00

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Description of Professional Services Rendered

TASK CODE: AIRP003 ASSUMPTION/REJECTION OF LEASES AND CONTRACTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/02/25	Allison J. McGregor	Draft notice of assumed contracts and send to AHF counsel for review	0.90	630.00
10/03/25	Allison J. McGregor	Email AHF regarding question from Oracel relating to assumption/rejection of contract	0.40	280.00
10/05/25	Allison J. McGregor	Emails with Oracel regarding use of licenses under APA	0.20	140.00
			Total Hours:	1.50
			Total Amount:	\$ 1,050.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP003,

ASSUMPTION/REJECTION OF LEASES AND CONTRACTS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	1.50	700.00	1,050.00
Totals:	1.50	700.00	\$ 1,050.00

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TASK CODE: AIRP007 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/25	Allison J. McGregor	Attend call with clients and Aurora to discuss bar date motion hearing and next steps	0.20	140.00
10/01/25	Allison J. McGregor	Email with S. Fields regarding submitting OCP Order (0.10); Draft Declaration of Disinterestedness for CLA and Venable (1.20) Email counsel for Venable and CLA regarding Declaration of Disinterestedness (0.20)	1.50	1,050.00
10/02/25	Allison J. McGregor	Email Aurora regarding Dennemeyer payment (0.20)	0.20	140.00
10/02/25	Allison J. McGregor	Email Verita regarding Bar Date Publication Notice and reverse address look up (0.50); Call with Aurora to discuss employee contact collection (0.50); Discussion with J. Elrod regarding employee contact collection (0.40); Follow up call with Aurora to further discuss employees contact collection (1.00)	2.40	1,680.00
10/03/25	Allison J. McGregor	Emails and discussion relating to Dennemeyer payment (0.60);	0.60	420.00
10/03/25	Allison J. McGregor	Email with J. Elrod regarding Labor Plaintiffs' questions regarding bar date employee collection efforts	0.60	420.00
10/03/25	Allison J. McGregor	Call with Aurora to discussion employee contact collection efforts in light of bar date hearing	0.50	350.00
10/03/25	Allison J. McGregor	Emails with J. Elrod and S. Fields regarding filing of Agenda and Assume Contract List in light of 10/6 hearing	0.30	210.00
10/05/25	John D. Elrod	Prepared for 10/6 hearings	3.00	3,750.00
10/06/25	John D. Elrod	Prepared for and attended 10/6 hearing	5.50	6,875.00
10/06/25	Allison J. McGregor	Revise Bar Date Order and Notice following hearing	2.30	1,610.00
10/06/25	Allison J. McGregor	Email S. Fields regarding omnibus hearing date	0.20	140.00
10/06/25	Diego Sasias Arroyo	Translation into Spanish	0.20	112.00
10/07/25	John D. Elrod	Communication with client regarding various issues (.3); attention to creditor demand for shipping payments (.2)	0.50	625.00
10/07/25	Allison J. McGregor	Meeting and discussions with Verita regarding proof of claims, claims portal, bar date, and service	0.70	490.00
10/07/25	Allison J. McGregor	Email Dennemeyer regarding patent annuity invoice	0.50	350.00
10/07/25	Allison J. McGregor	Revise proposed bar date order and email Verita regarding changes to be made to	1.30	910.00

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10/08/25	Allison J. McGregor	modified proof of claim form (0.80); circulate to counsel for review (0.50) Review and revise Bar Date Order (1.10); email S. Diego regarding translation of bar date notice to Spanish (0.50); email Q. George regarding translation of bar date notice to mandarin (0.50); Email chambers regarding remaining dispute in Bar Date Order (1.00)	3.10	2,170.00
10/08/25	Allison J. McGregor	Emails with Verita regarding bar date notice and publication	0.30	210.00
10/08/25	Allison J. McGregor	Email Aurora about excel to send to Verita for claims register	0.10	70.00
10/08/25	Diego Sasias Arroyo	Translation into Spanish	0.20	112.00
10/09/25	Allison J. McGregor	Emails regarding PNC's assumed contract (0.30); Emails with Tort Claimant counsel regarding Bar Date Order (0.40); Follow up with OCPs' counsel regard Declaration of Disinterestedness (0.40); call Chambers regarding docket entry of bar date order (0.20); email Verita re amended schedule excel for claims register (0.10); email update employee and contractor contact information to Verita for service of bar date (0.70); email Verita mandarin publication notice for World Journal (0.10)	2.20	1,540.00
10/09/25	Allison J. McGregor	Emails regarding declaration of disinterestedness	0.40	280.00
10/09/25	Allison J. McGregor	Finalize cover letters and service of independent contractor agencies	1.80	1,260.00
10/10/25	John D. Elrod	Update call with client (.6); follow up issues relating to same (.4)	1.00	1,250.00
10/10/25	Allison J. McGregor	Emails regarding service of Third Party Bar Date Packages; Emails to Labor Plaintiffs counsel regarding amended notice of appearance; Emails to Verita regarding final list of employees to be served with bar date notice ; email to A. George regarding mandarin translation of cover letter for third party bar date package	3.00	2,100.00
10/10/25	Allison J. McGregor	Call with Aurora/CRO to discuss next steps following sale	0.50	350.00
10/10/25	Allison J. McGregor	Email with Venable regarding Declaration of Disinterestedness (0.20); emails regarding Denemeyer payment (0.60); Draft Notice of Amended Exhibit to OCP Motion (1.00)	1.80	1,260.00
10/10/25	Tyler Sheridan	Research Assignment	5.00	1,875.00
10/12/25	Tyler Sheridan	Worked on research assignment regarding pre-plan payments and sub-rosa plans.	3.60	1,350.00
10/13/25	John D. Elrod	Calls with client regarding case issues (.8); communication with committee counsel (.2)	1.00	1,250.00

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Date	Attorney	Description of Services	Hours	Amount
10/13/25	Allison J. McGregor	Email Aurora regarding PII in employee information (0.60); emails with J. Elrod regarding service of bar date (1.00); check in call with Aurora (0.20); email DWT regarding any additional information related to service of individuals (0.10); call Fusheng Lien Services to get information for individuals (0.10); email Verita re COS of Bar Date (0.30); email J. Elrod re Amended OCP (0.10); emails relating to Dennemeyer payment (0.10); emails with S. Fields regarding service of packets on agencies (0.20); finalize Amended Exhibit B to OCP Motion for fling (0.20)	2.90	2,030.00
10/14/25	Allison J. McGregor	Provide update to client on OCP process (0.20); conversation with Aurora regarding payment to PNC (0.20); email DWT regarding L1 visas (0.10)	0.50	350.00
10/14/25	Allison J. McGregor	Email J. Elrod regarding omnibus hearing date	0.30	210.00
10/14/25	Allison J. McGregor	Email G. Qi regarding translation of Agency Service Cover Letter (0.10); Finalize email service of bar date package to Fusheng Lien Services (0.20); emails with S. Fields relating to email service on Fusheng Lien Services (0.30)	0.60	420.00
10/15/25	Allison J. McGregor	Emails relating to email service of bar date packages on Fusheng	0.30	210.00
10/15/25	Allison J. McGregor	Emails relating to omnibus hearing date and preparation of Notice of Omnibus Hearing	1.60	1,120.00
10/16/25	Allison J. McGregor	Review Verita COS to ensure employee information properly redacted	0.30	210.00
10/16/25	Allison J. McGregor	Email J. Elrod copy of Amended DIP Agreement	0.40	280.00
10/16/25	Allison J. McGregor	Review and revise COS of Bar Date Packets and file	1.00	700.00
10/16/25	Tyler Sheridan	Completed research on pre-plan payments.	6.40	2,400.00
10/17/25	Allison J. McGregor	Review research provided by T. Sheridan on pre-plan resolution of certain claims and respond via email with additional comments and questions	2.80	1,960.00
10/17/25	Tyler Sheridan	Researched A.McGregor's follow up questions regarding pre-plan payments.	5.20	1,950.00
10/20/25	John D. Elrod	Attention to potential reduction in force and avoidance of WARN Act issues	1.50	1,875.00
10/21/25	Allison J. McGregor	Confirm deadlines for OCP, Monthly Operating Reports, etc (0.20); emails related to OCP payment and declaration of disinterestedness (0.30); emails regarding payment of quarterly fee (2.40)	2.90	2,030.00
10/22/25	Allison J. McGregor	Email CLA regarding declaration of disinterestedness	0.10	70.00

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10/23/25	John D. Elrod	Communication with counsel for the committee	0.20	250.00
10/23/25	Allison J. McGregor	Emails with T. Sheridan regarding research on potential plan provisions	0.40	280.00
10/23/25	Tyler Sheridan	Continued working on A.McGregor's follow-up research questions.	6.90	2,587.50
10/24/25	John D. Elrod	Call with client regarding case issues	0.30	375.00
10/24/25	Allison J. McGregor	Emails regarding objection period under OCP order (0.30); review research from T. Sheridan on potential plan provisions (0.50); emails with Dennemeyer regarding payment of patent annuity fees (0.70)	1.50	1,050.00
10/24/25	Tyler Sheridan	Researched and prepared response for A.McGregor's follow-up question regarding pre-plan motions to repay unsecured trade creditors.	3.50	1,312.50
10/27/25	Allison J. McGregor	Call with Aurora and resarch ability to file combined operating report	0.20	140.00
10/28/25	John D. Elrod	Call with G. Baker re case issues (.2); call with client regarding tort claim issues (.5); review of research relating to tort claimant 2004 exam request (1.2)	1.90	2,375.00
10/28/25	Allison J. McGregor	Research pending proceeding rule and potential objections to labor plaintiffs rule 2004 exam requests	3.70	2,590.00
10/29/25	Allison J. McGregor	Research scope of Rule 2004 exam and respond to Labor Plaintiffs request for 2004 exam	3.40	2,380.00
10/29/25	Allison J. McGregor	Emails relating to payment of Quarterly Fees (0.50); emails related to filing of CLA declaration of disinterestedness (0.20); review Contract and send emails related to Dennemeyer payments (2.20)	3.10	2,170.00
10/30/25	Rick Bold	Prepare for and participate in conferral meeting with Labor Plaintiffs' counsel (0.5); discussions with S. Rosenwasser about next steps (0.5); attend to case emails about document collection and motion strategy (0.4).	1.40	1,260.00
10/30/25	Allison J. McGregor	Emails regarding Dennemeyer agreement	0.70	490.00
10/30/25	Steven J. Rosenwasser	Review objections to proposed Rule 2004 examination (0.1 hours); review draft motions to compel and email strategy on same (0.4 hours); prepare for and participate in conferral call (0.8 hours); confer w/Bold re: next steps (0.1 hours).	1.40	1,610.00
10/30/25	Tyler Sheridan	Researched A.McGregor's question about pre-plan payments and omnibus claims objection.	2.30	862.50
10/30/25	Tyler Sheridan	Discussed research assignments with A.McGregor	0.10	37.50
10/31/25	Rick Bold	Review filed motion for Rule 2004 examinations (1.0); discuss plan for motion	3.60	3,240.00

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		opposition and hearing with J. Elrod and S. Rosenwasser (1.0); analyze potential arguments and case law (1.6).		
10/31/25	Steven J. Rosenwasser	Review and respond to email from Aaron Halegua re: Rule 2004 examinations (0.2 hours); review sample paysheet (0.1 hours), call w/ Elrod (0.1 hours), call with Rick and John re brief and hearing (0.2 hours) - 0.6 hours	0.60	690.00
10/31/25	Tyler Sheridan	Finished up research for A.McGregor regarding paying unsecured trade creditors in full pending resolution of disputed claims.	7.10	2,662.50
			Total Hours:	113.60
			Total Amount:	\$ 76,526.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP007,

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Rick Bold	5.00	900.00	4,500.00
John D. Elrod	14.90	1,250.00	18,625.00
Steven J. Rosenwasser	2.00	1,150.00	2,300.00
Allison J. McGregor	51.20	700.00	35,840.00
Diego Sasias Arroyo	0.40	560.00	224.00
Tyler Sheridan	40.10	375.00	15,037.50
Totals:	113.60	673.65	\$ 76,526.50

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Description of Professional Services Rendered

TASK CODE: AIRP008 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/25	Philip J. George	Call with N. Weinrich regarding preservation of documents.	0.20	176.00
10/01/25	Miriam C. Thompson	Email correspondence with Waleska White re immigration compliance language in existing contractor agreement (0.3), review and edit agreement to minimize risk of exposure for contractor's immigration compliance practices (0.3).	0.60	477.00
10/02/25	John D. Elrod	Attention to claims bar date issues and review of communications with Court regarding same (.7); review of order granting bar date motion (.5); communication with DWT regarding contact info for potential claimants (.5)	1.70	2,125.00
10/04/25	John D. Elrod	Call with Allen Chen regarding staffing agency and messaging app access (.4); communication with tort claimants' counsel (.3); research regarding notice issues for former employees and contractors (3.5)	4.20	5,250.00
10/05/25	John D. Elrod	Prepared for and participated in conference call with committee and worker claimants' counsel regarding bar date issues (2.3); follow up emails regarding same (1.0); communication with client regarding same (.7); communication with Court regarding same (.5)	4.50	5,625.00
10/05/25	Jake C. Evans	Emails re class action, plaintiff's request for documents and consider and generate next steps on same.	1.00	850.00
10/06/25	John D. Elrod	Attention to proposed bar date order and ancillary documents (.6); communication with immigration counsel regarding case issues (.3)	0.90	1,125.00
10/07/25	John D. Elrod	Review and revised claims bar date order (.8); call with claims agent (.5)	1.30	1,625.00
10/07/25	Jake C. Evans	Conferences re timing of transaction finalization and impact on civil cases.	0.30	255.00
10/07/25	Philip J. George	Call regarding document collection and preservation.	0.60	528.00
10/07/25	George Qi	Email to A. McGregor regarding translation.	0.30	415.50
10/08/25	John D. Elrod	Review of tort claimants' edits to bar date notice and order (1.0); edited correspondence to Court regarding same (.2); review of issues relating to bar date notice (1.3); communication with creditor	2.70	3,375.00

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		Malia (.2)		
10/08/25	Jake C. Evans	Conference re order approving sale and next steps in light of same.	0.50	425.00
10/08/25	Jake C. Evans	Review Court Order approving sale.	0.30	255.00
10/08/25	Nara Heard	Draft Pro Hac Vice Application for Michael Slocum.	0.40	160.00
10/08/25	George Qi	Email to A. McGregor regarding translation.	0.20	277.00
10/08/25	Michael Slocum	Review J. Yang consent to join FLSA collective	0.20	190.00
10/09/25	John D. Elrod	Communication with counsel for PNC (.5); communication with counsel for tort claimants regarding various bar date order issues (.6); review of bar date order entered by Court (.3); coordination with claims agent regarding service and publication of bar date notice (.7)	2.10	2,625.00
10/09/25	Jake C. Evans	Analyze and review Order staying the A. Davis case as to G. Chen and consider impact of same.	0.30	255.00
10/10/25	Nara Heard	Draft, Finalize and File Pro Hac Vice for Michael Slocum.	1.10	440.00
10/10/25	George Qi	Email to A. McGregor regarding translation.	0.30	415.50
10/10/25	Michael Slocum	Further emails with client regarding defense strategy issues	0.20	190.00
10/11/25	John D. Elrod	Coordination with litigation team regarding case issues	0.50	625.00
10/12/25	John D. Elrod	Review of potential employee claims and communication with client regarding same (1.2); attention to machinery payoff issues (.2)	1.40	1,750.00
10/13/25	John D. Elrod	Attention to bar date notice issues and communication with noticing agent and creditors regarding same	2.10	2,625.00
10/14/25	John D. Elrod	Attention to bar date notice service issues and communication with client regarding same	2.10	2,625.00
10/14/25	Philip J. George	Email communications regarding case documents recently received from client.	0.10	88.00
10/14/25	George Qi	Email to A. McGregor regarding translation.	0.20	277.00
10/14/25	Michael Slocum	Initial review and evaluation of additional client emails and documents, including job descriptions and payroll reports	1.80	1,710.00
10/15/25	John D. Elrod	Review and revised notice letters to staffing agencies	1.00	1,250.00
10/16/25	John D. Elrod	Review of potential mechanisms for distributions to trade creditors	1.20	1,500.00
10/16/25	John D. Elrod	Attention to employee claimant issues and merits of same	2.30	2,875.00
10/16/25	Jake C. Evans	Emails and review re Raskin's termination of operation and consideration of same.	0.20	170.00

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10/20/25	Paul B. Ranis	Analyze multiple emails re: WARN Act compliance issues; prepare for and attend strategy call.	1.30	1,202.50
10/21/25	John D. Elrod	Review of claims filed against bankruptcy estates	1.00	1,250.00
10/21/25	Jake C. Evans	Review information re payments and visa status of plaintiffs.	0.30	255.00
10/21/25	Michael Slocum	Further emails with client regarding personnel documents and related issues	0.30	285.00
10/23/25	Philip J. George	Communications regarding preservation of information.	0.10	88.00
10/24/25	John D. Elrod	Attention to Denneweyer issues (.2); review of Rule 2019 statement filed by tort claimants (.5)	0.70	875.00
10/26/25	John D. Elrod	Review of email and 2004 motions from tort claimants' counsel and communication with opposing counsel and team regarding same	0.50	625.00
10/27/25	John D. Elrod	Emails with counsel for tort claimants (.3); discussion with litigation team (.3)	0.60	750.00
10/27/25	Jake C. Evans	Conference and emails re 2004 examinations of debtors.	0.50	425.00
10/28/25	John D. Elrod	Prepared for and participated in call with client regarding 2004 exams	1.50	1,875.00
10/28/25	Jake C. Evans	Conference re 2004 deposition and considerations and strategy on same.	0.50	425.00
10/29/25	John D. Elrod	Communication with counsel for A. Chen regarding rule 2004 issues (.2); review of law regarding 2004 exam (1.2); revised email to tort claimants' counsel (.5)	1.90	2,375.00
10/29/25	Jake C. Evans	Review emails from A. Halegua re 2004 exam.	0.20	170.00
10/29/25	Philip J. George	Review new documents provided by client.	0.10	88.00
10/30/25	John D. Elrod	Prepared for and participated in conferral call with labor claimants' counsel (1.5); follow up items relating to same (.6); review of claims register (1.3)	3.40	4,250.00
10/31/25	John D. Elrod	Attention to discovery issues from tort claimants (1.5) call with GT team regarding same (.4); calls with client and L&E specialist (.5); emails with tort claimants' counsel (.5)	2.90	3,625.00
10/31/25	Jake C. Evans	Emails and consideration re AHF and email transfer, Elcor, etc.	0.20	170.00
10/31/25	Jake C. Evans	Review emails re discussions with Liu class counsel and consider and draft emails re appropriate responses.	0.30	255.00
10/31/25	Jake C. Evans	Review response in opposition to motion for 2004 examination (.3); conferences on same re strategy (.4); review and consider research on same (.4).	1.10	935.00
10/31/25	Paul B. Ranis	Prepare for and attend zoom call re: WARN compliance and related HR issues.	0.50	462.50

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Description of Professional Services Rendered

Total Hours: 54.70

Total Amount: \$ 62,940.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP008,

CLAIMS ADMINISTRATION AND OBJECTIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	40.50	1,250.00	50,625.00
Jake C. Evans	5.70	850.00	4,845.00
George Qi	1.00	1,385.00	1,385.00
Paul B. Ranis	1.80	925.00	1,665.00
Michael Slocum	2.50	950.00	2,375.00
Miriam C. Thompson	0.60	795.00	477.00
Philip J. George	1.10	880.00	968.00
Nara Heard	1.50	400.00	600.00
Totals:	54.70	1,150.64	\$ 62,940.00

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TASK CODE: AIRP010 EMPLOYEE BENEFITS/PENSIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/09/25	Dawn Zhang	Provide Chinese translation of the certain language.	0.20	255.00
10/11/25	Yangyiyi Liu	Translate the notice into Chinese.	0.50	345.00
Total Hours:			0.70	
Total Amount:				\$ 600.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP010,

EMPLOYEE BENEFITS/PENSIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Dawn Zhang	0.20	1,275.00	255.00
Yangyiyi Liu	0.50	690.00	345.00
Totals:	0.70	857.14	\$ 600.00

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TASK CODE: AIRP011 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/11/25	John D. Elrod	Attention to professional compensation issues	0.40	500.00
10/13/25	John D. Elrod	Revised amended OCP list and pleading	0.20	250.00
Total Hours:			0.60	
Total Amount:				\$ 750.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP011,

FEE/EMPLOYMENT APPLICATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	0.60	1,250.00	750.00
Totals:	0.60	1,250.00	\$ 750.00

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TASK CODE: AIRP013 FINANCING/CASH COLLECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/25	John D. Elrod	Communication with client and DIP lender regarding DIP credit agreement issues	1.00	1,250.00
			Total Hours:	1.00
			Total Amount:	\$ 1,250.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP013,

FINANCING/CASH COLLECTIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	1.00	1,250.00	1,250.00
Totals:	1.00	1,250.00	\$ 1,250.00

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Description of Professional Services Rendered

TASK CODE: AIRP015 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/05/25	Allison J. McGregor	Call with Committee and Labor Plaintiffs regarding outstanding issues in bar date motion	1.90	1,330.00
10/30/25	Allison J. McGregor	Call with Labor Plaintiffs to discuss 2004 exam	0.60	420.00
			Total Hours:	2.50
			Total Amount:	\$ 1,750.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP015,

MEETINGS OF AND COMMUNICATIONS WITH CREDITORS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	2.50	700.00	1,750.00
Totals:	2.50	700.00	\$ 1,750.00

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TASK CODE: AIRP017 PLAN AND DISCLOSURE STATEMENT (INCLUDING BUSINESS PLAN)

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/28/25	Ari Newman	Call with J. Elrod regarding Plan status (.1); consider Plan structures and issues (.2).	0.30	352.50
			Total Hours:	0.30
			Total Amount:	\$ 352.50

TIMEKEEPER SUMMARY FOR TASK CODE AIRP017.

PLAN AND DISCLOSURE STATEMENT (INCLUDING BUSINESS PLAN)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Ari Newman	0.30	1,175.00	352.50
Totals:	0.30	1,175.00	\$ 352.50

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TASK CODE: AIRP019 REPORTING

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/21/25	John D. Elrod	Attention to monthly operating report issues	2.00	2,500.00
10/21/25	Allison J. McGregor	Finalize and File September Monthly Operating Reports	0.80	560.00
			Total Hours:	2.80
			Total Amount:	\$ 3,060.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP019,

REPORTING

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	2.00	1,250.00	2,500.00
Allison J. McGregor	0.80	700.00	560.00
Totals:	2.80	1,092.86	\$ 3,060.00

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Description of Professional Services Rendered

TASK CODE: AIRP022 HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/06/25	Allison J. McGregor	Prepare for and attend hearing on Sale Motion and Bar Date Motion	3.40	2,380.00
			Total Hours:	3.40
			Total Amount:	\$ 2,380.00

TIMEKEEPER SUMMARY FOR TASK CODE AIRP022,

HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Allison J. McGregor	3.40	700.00	2,380.00
Totals:	3.40	700.00	\$ 2,380.00

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Rick Bold	5.00	900.00	4,500.00
John D. Elrod	94.10	1,250.00	117,625.00
Jake C. Evans	5.70	850.00	4,845.00
Ari Newman	0.30	1,175.00	352.50
George Qi	1.00	1,385.00	1,385.00
Paul B. Ranis	1.80	925.00	1,665.00
Steven J. Rosenwasser	2.00	1,150.00	2,300.00
Michael Slocum	2.50	950.00	2,375.00
Miriam C. Thompson	0.60	795.00	477.00
David R. Yates	13.40	1,135.00	15,209.00
Dawn Zhang	0.20	1,275.00	255.00
Allison J. McGregor	66.90	700.00	46,830.00
Yangyiyi Liu	0.50	690.00	345.00
Diego Sasias Arroyo	0.40	560.00	224.00
Philip J. George	1.10	880.00	968.00
Tyler Sheridan	40.10	375.00	15,037.50
Nara Heard	1.50	400.00	600.00
Totals:	237.10	906.76	\$ 214,993.00

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
06/12/25	VENDOR: Platinum Filings LLC - ACH INVOICE#: 2025-96430 DATE: 6/12/2025 UCC, State Tax Liens (GA); UCC, Federal Tax Liens (OR) - Wellmade Industries MFR. N.A LLC / Wellmade Floor Coverings International, Inc	\$ 213.00
07/11/25	PACER Research Charges for: July 2025	\$ 6.30
07/23/25	PACER Research Charges for: July 2025	\$ 4.70
08/08/25	PACER Research Charges for: August 2025	\$ 0.90
08/19/25	PACER Research Charges for: August 2025	\$ 1.20
08/20/25	PACER Research Charges for: August 2025	\$ 5.50
08/25/25	PACER Research Charges for: August 2025	\$ 0.10
08/26/25	PACER Research Charges for: August 2025	\$ 106.00
08/27/25	PACER Research Charges for: August 2025	\$ 3.00
09/11/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096029689 DATE: 9/30/2025 Lexis Charges: September 1 - September 30 2025	\$ 11.94
09/12/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096029689 DATE: 9/30/2025 Lexis Charges: September 1 - September 30 2025	\$ 178.42
09/16/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096029689 DATE: 9/30/2025 Lexis Charges: September 1 - September 30 2025	\$ 200.73
09/21/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096029689 DATE: 9/30/2025 Lexis Charges: September 1 - September 30 2025	\$ 44.61
09/25/25	PACER Research Charges for: September 2025	\$ 10.90
09/26/25	PACER Research Charges for: September 2025	\$ 2.30
10/10/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$ 763.24
10/10/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$ 12.38
10/10/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$ 61.91
10/10/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$ 22.19
10/10/25	VENDOR: Fields, Sara M. INVOICE#: 128160 DATE: 10/10/2025 Postage; 10/10/2025 217339.012900 Postage Supplies; Merchant: United States Postal Service	\$ 1,360.00
10/10/25	VENDOR: Garcia, Dean INVOICE#: 128820 DATE: 10/15/2025 Misc. Legal Expenses; 10/10/2025 Pro Hac Vice Application/Michael Slocum; Merchant: GTCC COURTS/USDC-GA-N	\$ 100.00

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Description of Expenses Billed

10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101125616 DATE: 10/11/2025 Trk'ing No. 1Z0049R14499268140 / Next Day Air Residential from GREENBERG TRAUIG - ATLANTA Sara Fields to Starwin Service Inc. on 10/10/2025 - 217339.012900	\$	44.48
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101125616 DATE: 10/11/2025 Trk'ing No. 1Z0049R14495299936 / Next Day Air Residential from GREENBERG TRAUIG - ATLANTA Sara Fields to Join-Win Consulting Group LLC on 10/10/2025 - 217339.012900	\$	44.48
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101125616 DATE: 10/11/2025 Trk'ing No. 1Z0049R14492247372 / Next Day Air Commercial from GREENBERG TRAUIG - ATLANTA Sara Fields to OSMS d/b/a Garret iii Service Inc. on 10/10/2025 - 217339.012900	\$	36.67
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101125616 DATE: 10/11/2025 Trk'ing No. 1Z0049R14497969520 / Next Day Air Commercial from GREENBERG TRAUIG - ATLANTA Sara Fields to Larry Staffing Services on 10/10/2025 - 217339.012900	\$	36.67
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14492247372 / Shipping Charge Correction Fuel Surcharge from GREENBERG TRAUIG to OSMS d/b/a Garret iii Service Inc. on 10/10/2025 - 217339.012900	\$	7.08
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14495299936 / Shipping Charge Correction Fuel Surcharge from GREENBERG TRAUIG to Join-Win Consulting Group LLC on 10/10/2025 - 217339.012900	\$	1.41
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14497969520 / Shipping Charge Correction Fuel Surcharge from GREENBERG TRAUIG to Larry Staffing Services on 10/10/2025 - 217339.012900	\$	0.59
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14499268140 / Shipping Charge Correction Fuel Surcharge from GREENBERG TRAUIG to Starwin Service Inc. on 10/10/2025 - 217339.012900	\$	0.64
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14492247372 / Shipping Charge Correction Next Day Air from GREENBERG TRAUIG to OSMS d/b/a Garret iii Service Inc. on 10/10/2025 - 217339.012900	\$	36.78
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14495299936 / Shipping Charge Correction Next Day Air from GREENBERG TRAUIG to Join-Win Consulting Group LLC on 10/10/2025 - 217339.012900	\$	7.32

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Description of Expenses Billed

10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14497969520 / Shipping Charge Correction Next Day Air from GREENBERG TRAURIG to Larry Staffing Services on 10/10/2025 - 217339.012900	\$	3.07
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14499268140 / Shipping Charge Correction Next Day Air from GREENBERG TRAURIG to Starwin Service Inc. on 10/10/2025 - 217339.012900	\$	3.30
10/10/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R14497672911 / Next Day Air Residential from GREENBERG TRAURIG - ATLANTA Sara Fields to Fusheng Lean Services Inc. Attn. Peter Zheng on 10/10/2025 - 217339.012900	\$	69.90
10/15/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R10192622984 / Next Day Air Residential from GREENBERG TRAURIG - ATLANTA Sara Fields to Fusheng Lean Services Inc. on 10/15/2025 - 217339.012900	\$	25.29
10/15/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00101825458 DATE: 10/18/2025 Trk'ing No. 1Z0049R10192035396 / Next Day Air Commercial from GREENBERG TRAURIG - ATLANTA Sara Fields to Fusheng Lean Services Inc. on 10/15/2025 - 217339.012900	\$	59.02
10/16/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	647.60
10/16/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	70.09
10/16/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	61.91
10/16/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	24.76
10/16/25	WestlawNext Research by TYLER SHERIDAN on 10/16/2025 - Re: 217339.0129	\$	60.80
10/17/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	231.29
10/23/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	624.47
10/23/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	46.72

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Description of Expenses Billed

10/23/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	49.53
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	208.16
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	12.38
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	61.91
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	66.58
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	24.76
10/24/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	23.13
10/29/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	138.77
10/30/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	115.64
10/31/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	138.77
10/31/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	24.76
10/31/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3096081129 DATE: 10/31/2025 Lexis Charges: October 1 - October 31 2025	\$	24.76
Total Expenses:		\$	6,142.81

Exhibit E

Proposed Order

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. ____

**ORDER ON FIRST INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED BY
GREENBERG TRAURIG, LLP, COUNSEL TO THE DEBTORS, FOR
THE PERIOD OF AUGUST 4, 2025 THROUGH OCTOBER 31, 2025**

Upon consideration of the *First Interim Application for Allowance of Compensation and Reimbursement of Expenses Incurred by Greenberg Traurig, LLP, Counsel to the Debtors, for the Period of August 4, 2025 Through October 31, 2025* (the “Application”), for (a) allowance of reasonable compensation for professional services rendered by Greenberg Traurig, LLP (“GT”)

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.

to the Debtors for the period from August 4, 2025 through October 31, 2025 (the “Application Period”), and (b) reimbursement of actual and necessary charges and disbursements incurred by GT in the rendition of required professional services on behalf of the Debtors during the Application Period; and due and sufficient notice of the Application and (i) the opportunity to object the relief requested in the Application by December 23, 2025 (the “Objection Deadline”) and (ii) the hearing on the Application scheduled for January 6, 2026 at 1:30 p.m. (prevailing Eastern Time) having been given under the particular circumstances pursuant to the First Amended and Restated General Order No. 24-2018; and no objection to the Application having been filed prior to the Objection Deadline; and good and sufficient cause appearing therefore; and capitalized terms used in this Order being given the same meanings as are ascribed to those terms in the Application, it is hereby ORDERED as followed:

1. The Application [Docket No. [●]] is hereby granted in its entirety.
2. An interim allowance shall be made to GT in the sum of **\$751,570.00** as compensation for necessary and reasonable professional services rendered during the Application Period and the sum of **\$11,370.24** for reimbursement of actual and necessary costs and expenses incurred during the Application Period.
3. GT is authorized to apply against such amounts the amounts that have been and, subsequent to the Application, were paid to it by the Debtors in respect of the Application Period pursuant to the Complex Case Procedures.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. Notice of the Application as provided therein shall be deemed good and sufficient notice of such Application and the requirements of Bankruptcy Rule 6004(a), the Local Rules, and the Complex Case Procedures are satisfied by such notice.

7. The court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

8. Counsel for the Debtors, through Kurtzman Carson Consultants, LLC d/b/a Verita Global (“Verita”) shall, within three (3) days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first class mail, as applicable, on all parties served with the Application, and Verita shall file promptly thereafter a certificate of service confirming such service.

[END OF ORDER]

Prepared and presented by:

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

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Counsel for the Debtors and Debtors in Possession