

**ENTERED**

October 24, 2024

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Chapter 11

GLOBAL WOUND CARE MEDICAL GROUP, a  
Professional Corporation<sup>1</sup>

Case No. 24-34908

Debtor and Debtor in Possession.

**ORDER (I) AUTHORIZING THE DEBTOR TO (A) MAINTAIN INSURANCE  
PROGRAM AND (B) PAY INSURANCE OBLIGATIONS IN THE ORDINARY  
COURSE; AND (II) PREVENTING INSURANCE COMPANIES FROM ENFORCING  
IPSO FACTO CLAUSES OR GIVING ANY NOTICE OF TERMINATION OR  
OTHERWISE MODIFYING ANY INSURANCE POLICY WITHOUT OBTAINING  
RELIEF FROM THE AUTOMATIC STAY**

Upon the emergency motion (the “Motion”)<sup>2</sup> of the above-captioned debtor and debtor in possession (the “Debtor”) for entry of this order (the “Order”) (A) authorizing the Debtor to (i) maintain its insurance coverage levels, including authority to revise, extend, supplement, renew or change insurance coverage as needed and (ii) repay Wound Pros Management Group, Inc. (“Wound Pros”) under the terms of the Management Services Agreement (the “MSA”) for payments made with respect to insurance premiums, self-insured retentions, broker fees and deductibles in the ordinary course of business (collectively, the “Insurance Obligations”); and (B) preventing insurance companies from enforcing any *ipso facto* clauses or giving any notice of termination or otherwise modifying or cancelling any insurance policies without first obtaining relief from the automatic stay imposed by § 362 of the Bankruptcy Code, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this

<sup>1</sup> The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning afforded in the Motion.



matter pursuant to 28 U.S.C. § 1334; and this Court having found that (a) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (b) venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; (c) the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and (d) the Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted subject to the terms of this Order.
2. The final hearing (the "Final Hearing") on the Motion shall be held on November 12, 2024, at 11:00 a.m., Central Prevailing Time. Any objections or responses to entry of a final order on the Motion shall be filed on or before 4:00 p.m., Central Prevailing Time, on November 5, 2024. In the event no objections to entry of a final order on the Motion are timely received, the Court may enter such final order without need for the Final Hearing.
3. The Debtor is authorized to:
  - a. maintain its insurance coverage levels, including authority to revise, extend, supplement, renew or change insurance coverage as needed, and
  - b. make payments to Wound Pros under the terms of the MSA for payments made with respect to insurance premiums, self-insured retentions, broker fees and deductibles in the ordinary course of business.

4. The Debtor's insurers are barred from enforcing any *ipso facto* clauses or giving any notice of termination or otherwise modifying or cancelling any insurance policies without first obtaining relief from the automatic stay imposed by § 362 of the Bankruptcy Code.


5. The Debtor shall maintain a matrix/schedule of payments made pursuant to this Order, including the following information: (a) the names of the payee; (b) the date and amount of the payment; (c) the category or type of payment, as further described and classified in the Motion. Debtor shall provide a copy of such matrix/schedule to the U.S. Trustee and any statutory committee appointed in this chapter 11 case every 30 days beginning upon entry of this Order.

6. Notice of the Emergency Motion as provided therein shall be deemed good and sufficient notice, and the requirements of Bankruptcy Rules 2002 and 6004(a) and BLR 9013-1(b) are waived and/or satisfied by such notice.

7. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: October 24, 2024

  
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Christopher Lopez  
United States Bankruptcy Judge

United States Bankruptcy Court  
Southern District of Texas

In re:  
Global Wound Care Medical Group, a Professional Corporation  
Debtor

Case No. 24-34908-cml  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Oct 24, 2024

User: ADIuser  
Form ID: pdf002

Page 1 of 2  
Total Noticed: 3

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 26, 2024:**

Recip ID	Recipient Name and Address
db	+ Global Wound Care Medical Group, a Professional Co, 5901 West Century Boulevard, Suite 750, Los Angeles, CA 90045-5443
cr	UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JUSTICE, PO BOX 875, WASHINGTON, DC 20044-0875

TOTAL: 2

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
op	+ Email/Text: kccnoticing@kccllc.com	Oct 24 2024 20:09:00	Kurtzman Carson Consultants, LLC dba Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, UNITED STATES 90245-5614

TOTAL: 1

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 26, 2024

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 24, 2024 at the address(es) listed below:

Name	Email Address
Augustus Curtis	on behalf of Creditor UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JUSTICE augustus.t.curtis@usdoj.gov
Casey William Doherty, Jr	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation casey.doherty@dentons.com, robert.hammeke@dentons.com;Docket.General.Lit.Dal@dentons.com;Tabitha.peterson@dentons.com

District/off: 0541-4

User: ADIuser

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Date Rcvd: Oct 24, 2024

Form ID: pdf002

Total Noticed: 3

Christopher Ross Travis

on behalf of U.S. Trustee US Trustee C.Ross.Travis@usdoj.gov

Evan Gershbein

on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com,  
ECFpleadings@kccllc.com

Ha Minh Nguyen

on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov

US Trustee

USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 6