

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**JOINT NOTICE OF EXTENSION OF STIPULATION AND AGREED ORDER
REGARDING SUSPENSION OF MEDICARE PAYMENTS TO THE DEBTOR BY THE
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES**

PLEASE TAKE NOTICE that, on December 19, 2024, the Court approved that *Stipulation and Agreed Order Regarding Suspension of Medicare Payments to the Debtor by the United States Department of Health and Human Services* [Docket No. 87] (the “Stipulation”) between Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession in the above-captioned case (the “Debtor”), on the one hand, and, the Civil Division of the United States Department of Justice (the “DOJ”), on behalf of the United States of America, the United States Department of Health and Human Services (“HHS”) and its designated component, the Centers for Medicare and Medicaid Services (“CMS” and, collectively, with HHS and DOJ, the “United States”), on the other hand.

PLEASE TAKE FURTHER NOTICE that, pursuant to paragraph 10 of the Stipulation, the DOJ has sole discretion to extend the term of the Stipulation beyond December 31, 2024, that the DOJ previously agreed to extend the Stipulation through and including March 14, 2025

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



[Docket No. 129], and that DOJ has now further agreed to extend the Stipulation through and including March 21, 2025.

PLEASE TAKE FURTHER NOTICE that the Debtor and the DOJ have agreed to extend the date in paragraph 5(d) of the Stipulation from July 14, 2025 through and including July 21, 2025, and the date in paragraph 6(a) of the Stipulation from March 14, 2025 through and including March 21, 2025.

PLEASE TAKE FURTHER NOTICE that an Operating Budget (as defined in the Stipulation) is attached hereto as **Exhibit “A.”**

PLEASE TAKE FURTHER NOTICE that, in light of the Stipulation, the Debtor has agreed that no further action needs to be taken during the term of the Stipulation, including any extensions thereof, regarding the rebuttal letter to CMS dated October 11, 2024.

PLEASE TAKE FURTHER NOTICE that, except as provided herein, all terms set forth in the Stipulation and any prior Notices extending the Stipulation remain in full force and effect as if set forth in full in this Notice.

[Signature page to follow]

Dated: March 14, 2025

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.
Casey W. Doherty Jr.
1300 Post Oak Blvd.
Suite 650
Houston, TX 77056
Phone: (713) 658-4600
Email: casey.doherty@dentons.com

Samuel R. Maizel (admitted *pro hac vice*)
Tania M. Moyron (admitted *pro hac vice*)
601 S. Figueroa Street
Suite 2500
Los Angeles, CA 90017
Telephone: (213) 892-2910
Email: samuel.maizel@dentons.com
Email: tania.moyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

/s/ Augustus T. Curtis
(signed by permission)
KIRK T. MANHARDT
MARY A. SCHMERGEL
AUGUSTUS T. CURTIS
ANDREW WARNER
Commercial Litigation Branch
Civil Division
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington D.C. 20044
Tel. (202) 598-7524
Email: augustus.t.curtis@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on March 14, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey W. Doherty Jr.

EXHIBIT A

Global Wound Care Medical Group and Wound Pros Management Group
1-Week Operating Budget
Period Ended March 22, 2025

	Week Ended 3/22/2025	TOTAL
Biologics Product Expenses	\$ 18,720,623	\$ 18,720,623
Other Cost of good sold	524,171	524,171
Payroll Expense	3,774,190	3,774,190
Rent Expenses	66,504	66,504
Admin Expense	492,272	492,272
Insurance Expense	103,931	103,931
Services Cost	2,441,026	2,441,026
Software Expense	647,957	647,957
Travel Expenses	134,424	134,424
Marketing and Sales Expenses	47,485	47,485
Total Operating Expenses	\$ 26,952,584	\$ 26,952,584