

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.

Chapter 11

Case No. 24-34908 (CML)

GLOBAL WOUND CARE MEDICAL
GROUP, a Professional Corporation,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.

Defendant.

Adv. Pro. No. 25-03121 (CML)

**DECLARATION OF LOUIS E. ROBICHAUX IV IN
SUPPORT OF THE DEBTOR'S MOTION FOR PRELIMINARY
INJUNCTION AND TEMPORARY RESTRAINING ORDER**

I, Louis E. Robichaux IV, declare, pursuant to section 1746 of title 28 of the United States Code, that the following is true to the best of my knowledge:

1. I am a Senior Managing Director of Ankura Consulting Group, LLC ("Ankura"). I submit this declaration (the "Declaration") in support of the *Debtor's Motion for Preliminary Injunction and Temporary Restraining Order* (the "Motion").

2. I am authorized to submit this Declaration on behalf of the Debtor and Ankura, and if called upon to testify, I could and would testify competently to the facts and opinions set forth herein.

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



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3. Ankura has provided, and continues to provide, financial and restructuring advisory services to Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the “Debtor”)² in the above-captioned Chapter 11 case (the “Chapter 11 Case”).

4. Except as otherwise indicated, all statements in this Declaration are based on: (a) my personal knowledge and views; (b) my review of relevant documents; (c) information provided to me by employees of Ankura, working under my supervision; (d) information provided to me by, or discussions with, members of the Debtor’s management team; and (e) my opinion based upon my experience in the healthcare restructuring industry.

5. In my role as Senior Managing Director at Ankura, I provide restructuring, crisis management, financial advisory, and expert witness services to parties in a broad variety of distressed corporate settings, with a significant emphasis on the US healthcare industry. I have over 30 years of industry and restructuring experience, with significant experience in transitioning government payor arrangements as a seller in numerous matters, including in Randolph Hospital, Inc. d/b/a Randolph Health, Senior Management Services of America, and Physicians Specialty Hospital of El Paso, East LP, among others.

6. Based on my healthcare industry experience, an abrupt closure of a debtor’s depository accounts into which third-party EFT or ACH (each as defined herein) payments flow would be disastrous to a debtor’s business. Any abrupt closure

² Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in Motion.

of the Bank Account will stop a significant portion of the Debtor's cash flow immediately, which would be especially disastrous for this debtor because any interruption in its operating cashflow would negatively impact the Debtor's ability to provide critical healthcare services to its elderly patients. Without careful planning and coordination between the government payor and a payee, the electronic fund transfers ("EFTs") and the automatic clearing-house ("ACH") transactions from the government payors likely will be rejected, leaving the Debtor without the funds it depends on, and government payors will freeze future payments until account information is updated and they are satisfied future payments will not be rejected. Once EFTs or ACHs are rejected, the government payors typically initiate an investigation to determine who they should pay going forward, and why the EFT or ACH was rejected by the recipient financial institution. This process typically takes at least 1 - 2 months (but can be longer), during which all payments will be frozen. If this happens here, the Debtor will receive no cash flow from these sources during this time period.

7. It is also my understanding that, if the bank account is closed, the Debtor will have to inform each impacted payor that it is opening a new bank account. While the bank account is being set up, the payor will likely issue paper checks, which cause further delay. In addition to the delay, the Debtor will have to expend its limited resources to reconcile each payment on a manual basis with the payors. Based on my experience, it could take longer than three months before these manual payments are reconciled.

8. In my experience, it is always difficult for any debtor with government arrangements to transition bank accounts, and it will result in material impact on working capital because it will interrupt the debtor's receipt of government receivables for a significant period of time. When the transition to new bank accounts is done in a

coordinated and managed fashion, the debtor is in a better position to prepare and ensure that it has enough liquidity to sustain its operations. In this scenario, it usually takes around thirty days for a debtor to open new bank accounts, and then an additional sixty days for the debtor to work with government payors to transition payment systems while monitoring, managing, and reconciling any payment issues that inevitably arise.

9. Most significantly, without the opportunity to carefully plan for and manage liquidity during a managed and coordinated transition, under the circumstances here, the Debtor is unlikely to have sufficient liquidity to sustain its operations until payments can be reconciled and cash flow returns to normal.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 4, 2025

/s/ Louis E. Robichaux IV
Louis E. Robichaux IV
Senior Managing Director