

**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 April 14, 2025 [Docket

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



No. 163], and that DOJ has now further agreed to extend the Stipulation through and including April 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 August 14, 2025, through and including August 21, 2025, and the date in paragraph 6(a) of the Stipulation from April 14, 2025, through and including April 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: April 14, 2025

Respectfully submitted,

DENTONS US LLP

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Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on April 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
April Operating Budget
Period Ended April 21, 2025

	5-Days Ended 4/19/2025	2-Days Ended 4/21/2025	TOTAL
Biologics Product Expenses	\$ 14,512,995	\$ 492,100	\$ 15,005,095
Other Cost of good sold	777,066	181,866	958,932
Payroll Expense	3,827,851	128,207	3,956,058
Rent Expenses	7,636	57,762	65,398
Admin Expense	305,690	10,889	316,579
Insurance Expense	1,557,837	220,931	1,778,768
Services Cost	851,269	206,411	1,057,680
Software Expense	318,067	30,292	348,359
Travel Expenses	380,654	21,508	402,162
Marketing and Sales Expenses	147,485	9,497	156,982
Total Operating Expenses	\$ 22,686,551	\$ 1,359,463	\$ 24,046,014