

**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)

**STIPULATION AND ORDER EXTENDING OBJECTION DEADLINE REGARDING
MOTION FOR STAY RELIEF AND EMERGENCY MOTION**

This Stipulation and Order (the "Stipulation and Order") is entered into by and among Global Wound Care Medical Group, a Professional Corporation (the "Debtor") and Wells Fargo Bank, N.A. ("Wells Fargo" and, together with the Debtor, the "Parties"). The Parties hereby stipulate and agree as follows:

RECITALS

A. On October 21, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code² initiating the above-captioned main bankruptcy case (Case No. 24-34908) (the "Bankruptcy Case") in the United States Bankruptcy Court for the

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

² Title 11 of the U.S. Code.



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Southern District of Texas (the "Court"). The Debtor remains in possession of its assets and continues to operate its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

B. On April 4, 2025, Wells Fargo filed its *Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to Close the Debtor's Bank Account* [Main Case, Docket No. 157] (the "Motion for Stay Relief").

C. On April 4, 2025, the Debtor filed the *Debtor's Emergency Motion for Preliminary Injunction and Temporary Restraining Order* [Adv. Pro. Dkt. No. 2] (the "Emergency Motion," and together with the Motion for Stay Relief, the "Motions").

D. The objection deadline on the Motions is April 25, 2025 (the "Objection Deadline").

E. Since the Motions were filed, the Parties have been working consensually to resolve the Motions and accordingly, the Parties have agreed to enter into and jointly submit this Stipulation.

IT IS HEREBY STIPULATED AND AGREED, AND UPON COURT APPROVAL HEREOF, IT IS HEREBY ORDERED:

1. The above recitals are incorporated by reference into this Agreed Order with the same force and effect as if fully set forth hereinafter.

2. The terms of this Stipulation and Order are approved and **GRANTED** in their entirety as set forth above and below and shall become effective and binding immediately upon entry by the Court.

3. The Objection Deadline on the Motions is hereby extended to **April 30, 2025** (the "Extended Objection Deadline"); *provided* that such deadline may be further extended by written agreement of the Parties upon approval of the Court.

4. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation and Order to present any copies, electronic copies, or facsimiles signed by the Parties here to be charged.

5. Each undersigned counsel represents that they are authorized to execute and bind their respective clients to the terms of this Stipulation and Order.

6. This Stipulation and Order shall not be modified, alternated, amended, or vacated without the written consent of all Parties hereto or by further order of the Court.

7. The Court shall retain sole and exclusive jurisdiction over all matters related to this Stipulation and Order.

8. This Stipulation and Order is a Final Order within the meaning of 28 U.S.C. § 158(a)(1) and is effective immediately upon entry.

Dated: _____, 2025
Houston, Texas

HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

Stipulated and agreed to by:

Dated: April 25, 2025
New York, New York

Dated: April 25, 2025
Houston, Texas

GLOBAL WOUND CARE MEDICAL,
a Professional Corporation.

WELLS FARGO BANK, N.A.

By:

By:

/s/ Kyle J. Ortiz*
Kyle J. Ortiz (admitted *pro hac vice*)
Jared C. Borriello (admitted *pro hac vice*)
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Conflicts Counsel to the Debtor

Counsel to Wells Fargo Bank, N.A.

*Signed by permission, Sean B. Davis