

**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 28, 2025 [Docket

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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No. 175], and that DOJ has now further agreed to extend the Stipulation through and including May 5, 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 28, 2025, through and including September 4, 2025, and the date in paragraph 6(a) of the Stipulation from April 28, 2025, through and including May 5, 2025.

PLEASE TAKE FURTHER NOTICE that the Debtor and the DOJ have agreed to extend any deadline for the United States to file a proof of claim in the above-captioned bankruptcy case through and including September 12, 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 28, 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/ Andrew Warner (signed
by permission)
KIRK T. MANHARDT
MARY A. SCHMERGEL
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: Andrew.Warner@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on April 28, 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
May Operating Budget
Period Ended May 05, 2025

	5-Days Ended 5/3/2025	2-Days Ended 5/5/2025	TOTAL
Biologics Product Expenses	\$ 13,516,290	\$ 1,002,510	\$ 14,518,800
Other Cost of good sold	343,076	45,000	388,076
Payroll Expense	3,236,318	76,503	3,312,821
Rent Expenses	106,999	1,919	108,918
Admin Expense	288,977	78,393	367,371
Insurance Expense	385,931	159,786	545,717
Services Cost	1,188,050	54,829	1,242,879
Software Expense	416,517	30,292	446,809
Travel Expenses	434,424	26,885	461,309
Marketing and Sales Expenses	47,485	9,497	56,982
Total Operating Expenses	\$ 19,964,066	\$ 1,485,615	\$ 21,449,681