

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a  
Professional Corporation,<sup>1</sup>

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 May 19, 2025 [Docket

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



No. 199], and that DOJ has now further agreed to extend the Stipulation through and including June 14, 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 September 18, 2025, through and including October 16, 2025, and the date in paragraph 6(a) of the Stipulation from May 19, 2025, through and including June 14, 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: May 19, 2025

Respectfully submitted,

**DENTONS US LLP**

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**CERTIFICATE OF SERVICE**

This is to certify that I have on May 19, 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/June Operating Budget**  
**Period Ended June 14, 2025**

	<b>5-Days Ended 5/24/2025</b>	<b>Week Ended 5/31/2025</b>	<b>Week Ended 6/7/2025</b>	<b>Week Ended 6/14/2025</b>	<b>TOTAL</b>
Biologics Product Expenses	\$ 15,762,849	\$ 2,711,235	\$ 4,367,048	\$ 5,348,280	\$ 28,189,412
Other Cost of good sold	352,805	296,546	185,959	338,490	1,173,800
Payroll Expense	1,249,005	3,055,944	592,960	3,144,838	8,042,748
Rent Expenses	36,117	69,332	32,341	7,760	145,551
Admin Expense	233,763	208,060	221,140	236,127	899,089
Insurance Expense	549,786	170,931	13,931	103,931	838,578
Services Cost	806,369	225,489	615,665	670,471	2,317,994
Software Expense	272,629	219,618	151,461	113,595	757,303
Travel Expenses	384,424	134,424	134,424	134,424	787,696
Marketing and Sales Expenses	84,985	47,485	47,485	47,485	227,440
<b>Total Operating Expenses</b>	<b>\$ 19,732,731</b>	<b>\$ 7,139,063</b>	<b>\$ 6,362,413</b>	<b>\$ 10,145,400</b>	<b>\$ 43,379,608</b>