

**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)

**DECLARATION OF TAYLOR ROSALES IN RESPONSE TO ISSUES RAISED AT THE
STATUS CONFERENCE**

I, Taylor Rosales, J.D., hereby declare and state as follows:

1. I am an attorney serving as the Legal Audit Supervisor in the internal Legal Department of Wound Pros Management Group, Inc. (“Wound Pros”), a Management Services Organization (“MSO”), for Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the “Debtor”) in the above-captioned case (the “Case”). Prior to my employment at Wound Pros, I worked as an attorney at Prime Healthcare from August 2022 to April 2024. I obtained my Juris Doctorate from the University of LaVerne in 2018.

2. I submit this declaration in response to certain assertions made during the Status Conference held on October 21, 2025, related to the status of the Debtor’s Medicare reimbursement claims.² All of the statements made herein are true and correct to the best of my knowledge, information, and belief.

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

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the *Status Conference Report and Declarations of Ralph Cetrulo, Chief Financial Officer, and Louis E. Robichaux, Chief Restructuring Officer, in Support Thereof* [Docket No. 290] (the “Status Conference Report”).



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3. In the ordinary course of my employment with Wound Pros, on behalf of the Debtor, I work closely with various Medicare Administrative Contractors (the “MACs”)³ regarding the Debtor’s Medicare claim reimbursement submissions.

4. Between September 1, 2025 and October 21, 2025, MACs have issued 548 requests for ADR to the Debtor in response to claims submitted by the Debtor. The status of the Debtor’s submissions in response to these ADRs are as follows:

- a. 412 ADRs have been submitted to various MACs by the Debtor’s internal legal department;
- b. 38 ADRs are currently pending with the Debtor’s clinical team for review prior to submission to various MACs; and
- c. 74 ADRs are currently pending with the Debtor’s medical records team for gathering and approval prior to submission to various MACs.

5. Even though the Debtor received less than 50 ADR in total between January and July of this year, the Debtor now receives sometimes as many as 50 ADR per day, and averages more than 10 ADR daily. The dramatic increase in ADRs is unexplained by any MAC, unexpected in that we were not given any notice this was going to happen, and unprecedented in my time working with Wound Pros and the Debtor. The rapid increase in ADRs without any warning caught the Debtor by surprise and required resources to be assigned to address with it. However, as shown in the paragraph above, we now have responded to the bulk of the ADRs and are responding to new ADRs promptly.

6. Notwithstanding the substantial progress the Debtor has made regarding ADR submissions, I am informed and believe that the MACs are not in a position to process these ADR submissions in a timely manner. Specifically, in a telephone call on October 14, 2025, with the

³ MACs are private insurance companies contracted by CMS to process Medicare claims, handle provider enrollment and reimbursement, and serve as the primary point of contact between the Medicare program and healthcare providers.

Noridien Representative, Chris, the MAC responsible for California based claims, the MAC representative informed me that, even after the Debtor provides the MAC with all requested documentation, the MACs are so overwhelmed with ADR submissions that they are unable to, among other things, even enter ADR submissions into their system on a daily basis, much less fully process the documentation in a timely fashion. Noridien representatives do not provide a last name, but instead a reference number, which was provided to me.

7. Moreover, when speaking with the Noridian Representative, Megan, on October 21, 2025, she informed me that the Data source on the portal was still not displaying on their system due to the overwhelming amount of ADR request coming from the Adjudication unit and the medical record request unit. Due to the foregoing, she was not able to inform me on the status update of the 412 ADRs that were already submitted to the MAC and would need to look up each individual claim in order to check on status.

8. I am informed and believe that at the Status Conference, counsel for the United States asserted that there was an “alarming” rate of denials of claims submitted by the Debtor and Wound Pros after review of the ADR submissions since September 1, 2025. In the ordinary course of my employment with Wound Pros, I am immediately made aware of any denials issued by a MAC. As of the date of this declaration, I am unaware of any denials of Medicare claims the Debtor has submitted since September 1, 2025 and which were subject to an ADR. In fact, since September 1, 2025, we have not received any denials of claims that have been submitted based on a denied ADR.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: October 21, 2025

/s/ Taylor Rosales

Taylor Rosales, J.D.