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

In re:

Chapter 11

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

Case No. 24-34908

Debtor and Debtor in Possession.

# NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM

### TO: ALL PERSONS AND ENTITIES WHO MAY HAVE CLAIMS AGAINST GLOBAL WOUND CARE MEDICAL GROUP, A PROFESSIONAL CORPORATION:

# PLEASE TAKE NOTICE THAT:

1. On October 21, 2024 (the "<u>Petition Date</u>"), Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the "<u>Debtor</u>") in the abovecaptioned case (the "<u>Case</u>") filed a voluntary petition for relief under chapter 11 of the United States Code (the "<u>Bankruptcy Code</u>") in the United States Bankruptcy Court for the Southern District of Texas (the "<u>Court</u>").

## **BAR DATES**

2. On March 6, 2025, the Court entered an order [Docket No. 138] (the "<u>Bar Date</u> <u>Order</u>")<sup>2</sup> pursuant to which the Court established **April 8, 2025, at 5:00 p.m. (prevailing Central Time)** (the "<u>General Bar Date</u>") as the deadline for non-governmental units to file Proofs of Claim against the Debtor and **April 21, 2025, at 5:00 p.m. (prevailing Central Time)** for governmental units, other than the United States and any of its agencies or instrumentalities, for whom the deadline to file any Proofs of Claim against the Debtor is **July 14, 2025, at 5:00 p.m. (prevailing Central Time)** (the "<u>Governmental Bar Dates</u>" and, together with the General Bar Date, the "<u>Bar</u> <u>Dates</u>").

3. <u>The Bar Dates apply to all claims against the Debtor that arose before the</u> <u>Petition Date</u>, including, but not limited to, claims against the Debtor arising under § 503(b)(9)

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

 $<sup>^2</sup>$  Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Bar Date Order.

of the Bankruptcy Code;<sup>3</sup> *provided, however*, that the Bar Dates do not apply to the "Excluded Claims" listed in paragraph 6 below.

# PROCEDURES FOR FILING CLAIMS AGAINST ABOVE-REFERENCED DEBTOR:

4. Pursuant to the Bar Date Order the Court established certain procedures for filing proofs of claim, which procedures are summarized in this notice for your convenience.

5. Unless you fall into one of the "Excluded Claim" categories listed in paragraph 6 below, you <u>MUST</u> file a proof of claim if you have any claim against the Debtor that arose before the Petition Date. Acts or omissions that occurred before the Petition Date may give rise to claims, including, but not limited to, personal injury or asbestos claims for which injury has not yet manifested, and are subject to the Bar Dates even if the claims may not have become known or fixed or liquidated until after the Petition Date. Under § 101(5) of the Bankruptcy Code and as used herein, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

6. The Bar Date Order provides that creditors do NOT have to file proofs of claim by the Bar Dates for the types of claims listed below in this paragraph 6 (collectively, the "<u>Excluded</u> <u>Claims</u>"). You may, but are not required to, file a proof of claim at this time for any Excluded Claim. The Court may enter one or more separate orders at a later time requiring creditors to file proofs of claim for some kinds of Excluded Claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. Excluded Claims include:

- a. The U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C. § 1930;
- b. Any person or entity that has already properly filed or submitted a Proof of Claim against the Debtor but only with respect to the particular claim that was properly filed against the Debtor;
- c. Any person or entity (i) whose claim is listed in the Schedules or any amendments thereto, (ii) whose claim is not described therein as "disputed," "contingent," or "unliquidated," and (iii) who does not dispute the amount or characterization of its claim as set forth in the Schedules (including that the claim is an obligation of the Debtor against which the claim is listed in the Schedules);
- d. Any entity that holds a claim allowable under §§ 503(b) and

<sup>&</sup>lt;sup>3</sup> A claim arising under 503(b)(9) of the Bankruptcy Code is a claim arising from the value of any goods received by the Debtor within twenty (20) days before Petition Date, provided that the goods were sold to the Debtor in the ordinary course of the Debtor's business.

507(a)(2) of the Bankruptcy Code as an administrative expense (other than any claim allowable under § 503(b)(9) of the Bankruptcy Code), including any professionals retained by the Debtor or any statutory committee pursuant to orders of this Court that asserts administrative claims for fees and expenses subject to the Court's approval pursuant to §§ 330 and 331 of the Bankruptcy Code, but, in each case, solely to the extent of such administrative claim(s);

- e. Any party that is exempt from filing a Proof of Claim pursuant to an order of the Court in this Case;
- f. Any person or entity whose claim has been paid in full by the Debtor pursuant to the Bankruptcy Code or in accordance with an order of the Court;
- g. Any person or entity holding an equity security (as defined in § 101(16) of the Bankruptcy Code) in the Debtor solely with respect to such equity security interest; *provided, that* if any such holder also wishes to assert a claim against (as opposed to an equity security interest in) the Debtor, including, but not limited to, a claim arising from the purchase or sale of a security of the Debtor or rescission under § 510 of the Bankruptcy Code, such holder must submit a Proof of Claim asserting such claim on or before the applicable Bar Date;
- h. Any entity whose claim is solely against any non-Debtor affiliate(s);
- i. Any non-Debtor affiliate asserting a claim against the Debtor affiliate; and
- j. Any person or entity whose claim against the Debtor has been allowed by an order of the Court, entered on or before the applicable Bar Date.

## 7. THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTOR BELIEVES YOU HAVE A CLAIM.

8. If the Debtor files an amendment (an "<u>Amendment</u>") to any of the schedules of assets and liabilities and statements of financial affairs (collectively, the "<u>Schedules</u>") that (a) reduces the undisputed, noncontingent, and liquidated amount of the claim, or (b) changes the nature or characterization of that claim, or (c) adds a new claim to the Schedules, the Debtor will give notice of that Amendment to the holders of the claims that are affected by it, and those holders will be given an opportunity to file proofs of claim or, to the extent necessary, amend any previously-filed proof of claim by the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) thirty (30) days after the claimant is served with notice of the

applicable Amendment. Any amended proof of claim or subsequently filed proof of claim shall be deemed to have superseded any prior proof of claim filed with respect to that amended claim.

9. The Bankruptcy Code provides that debtors may, at any time before a plan of reorganization or liquidation is confirmed by the Court, choose to reject certain executory contracts or unexpired leases. If your contract or lease is rejected, you may have a claim resulting from that rejection. The deadline to file a proof of claim for damages relating to the rejection of the contract or lease is the later of (a) the General Bar Date or Governmental Bar Date, as applicable, or (b) thirty (30) days after entry of any order authorizing the rejection of the contract or lease.

## **INSTRUCTIONS FOR FILING PROOFS OF CLAIM:**

If you file a proof of claim, your filed proof of claim must (i) be legible; (ii) include 10. a claim amount denominated in United States dollars using, if applicable, the exchange rate as of 5:00 p.m. (prevailing Central Time) on the Petition Date (and to the extent such claim is converted to United States dollars, state the rate used in such conversion); (iii) conform substantially to the proof of claim form provided by the Debtor or Official Form 410; (iv) set forth with reasonable specificity the legal and factual basis for the alleged claim; and (v) be signed by the claimant or by an authorized agent or legal representative of the claimant on behalf of the claimant, whether such signature is an electronic signature or is ink. The Debtor is enclosing a proof of claim form for use in this Case. If your claim is scheduled by the Debtor, the form also sets forth the amount of your claim as scheduled by the Debtor and whether the claim is scheduled as contingent, unliquidated, or disputed. You will receive a different proof of claim form for each claim scheduled in your name by the Debtor. If you require additional proof of claim forms, you may obtain a proof of claim form from any bankruptcy court clerk's office, your lawyer, certain business supply stores, or by accessing the Debtor's bankruptcy administration website, at https://www.veritaglobal.net/gwc.

11. If your claim asserts a security interest in property of the Debtor, your proof of claim must be accompanied by evidence that such security interest has been perfected. If, however, such documentation is voluminous, upon consent of the Debtor's counsel, your proof of claim may include a summary of such documentation or an explanation as to why such documentation is not available, *provided* that any creditor that received such consent shall be required to transmit such writings to Debtor's counsel upon request no later than ten (10) days from the date of such request.

12. Your proof of claim form must be filed so as to be RECEIVED on or before April 8, 2025, at 5:00 p.m. (prevailing Central Time) for general creditors (non-governmental units), and April 21, 2025, at 5:00 p.m. (prevailing Central Time) for governmental units, other than the United States and any of its agencies or instrumentalities, for whom the deadline to file any proof of claim is July 14, 2025, at 5:00 p.m. (prevailing Central Time).

13. You can file your proof(s) of claim (i) electronically through Kurtzman Carson Consultants, LLC dba Verita Global ("<u>Verita</u>"), at <u>https://www.veritaglobal.net/gwc</u>; (ii) electronically through PACER (Public Access to Court Electronic Records), at

<u>https://ecf.txsb.uscourts.gov;</u> or (iii) by delivering the original proof(s) of claim to Verita by first class mail, overnight mail, or hand delivery at the following address:

### GWC Claims Processing Center c/o KCC dba Verita 222 N Pacific Coast Highway, Suite 300 El Segundo, CA 90245

14. *Verita will not accept a proof of claim sent by facsimile or email, and any proof of claim submitted via facsimile or email will be disregarded.* 

#### **CONSEQUENCES OF MISSING DEADLINES FOR FILING CLAIMS:**

15. EXCEPT WITH RESPECT TO EXCLUDED CLAIMS (AS DESCRIBED IN PARAGRAPH SIX (6) ABOVE), IF YOU FAIL TO FILE A PROOF OF CLAIM SO THAT IT IS ACTUALLY RECEIVED ON OR BEFORE THE APPLICABLE BAR DATE ON ACCOUNT OF ANY CLAIM YOU WISH TO ASSERT AGAINST THE DEBTOR, THEN YOU WILL NOT, WITH RESPECT TO SUCH CLAIM, BE TREATED AS A CREDITOR FOR VOTING OR DISTRIBUTION PURPOSES WITH RESPECT TO THIS CASE.

#### EXAMINATION OF BAR DATE ORDER AND SCHEDULES:

16. Copies of the Bar Date Order, the Schedules, and other information regarding the Debtor's Case are available for inspection free of charge on the Debtor's bankruptcy administration website, at <u>https://www.veritaglobal.net/gwc</u>, maintained by the Debtor's claims and noticing agent, Verita. Copies of the Schedules and other documents filed in this Case may also be examined between the hours of 8:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday, at the Office of the Clerk of the Court, 515 Rusk Avenue, Houston, TX 77002.

## **QUESTIONS:**

17. Proof of claim forms and a copy of the Bar Date Order may be obtained by visiting Verita's website at <u>https://www.veritaglobal.net/gwc</u>. Verita cannot advise you how to file, or whether you should file, a proof of claim. Questions concerning the contents of this Notice and requests for copies of filed proofs of claim should be directed to Verita by visiting <u>https://www.veritaglobal.net/GWC/inquiry</u> or by calling Verita at (866) 967-0671. Please note that neither Verita's staff, counsel to the Debtor, nor the Clerk of the Court's Office is permitted to give you legal advice.

A HOLDER OF A POSSIBLE CLAIM AGAINST THE DEBTOR SHOULD CONSULT AN ATTORNEY REGARDING ANY MATTERS NOT COVERED BY THIS NOTICE SUCH AS WHETHER THE HOLDER SHOULD FILE A PROOF OF CLAIM.