

**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 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 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 (collectively with HHS, 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, and the DOJ has agreed to extend the Stipulation through and until January 31, 2025.

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



PLEASE TAKE FURTHER NOTICE that the Debtor and the DOJ have agreed to extend the date in paragraph 5(d) of the Stipulation from April 30, 2025 to May 31, 2025, and the date in paragraph 6(a) of the Stipulation from December 31, 2024 to January 17, 2025.

PLEASE TAKE FURTHER NOTICE that an Operating Budget (as defined in the Stipulation) for the month of January 2025 is attached hereto as **Exhibit “A.”**

Dated: December 31, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that I have on December 31, 2024, 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.

In re: Global Wound Care Medical Group, a Professional Corporation
USBC Southern District of Texas Case No. 24-34908 (CML)

Exhibit A

Operating Budget for the month of January 2025

Global Wound Care Medical Group and Wound Pros Management Group
5-Week Operating Budget
Period Ended January 31, 2025

WEEK ENDED	1/4/2025	1/11/2025	1/18/2025	1/25/2025	1/31/2025	5-Week TOTAL
Biologics Product Expenses	\$ 4,563,576	\$ 21,892,555	\$ 3,336,842	\$ 2,292,953	\$ 3,206,558	\$ 35,292,484
Other Cost of good sold	208,779	208,779	208,779	208,779	208,779	1,043,894
Payroll Expense	464,840	2,795,864	464,840	3,371,066	464,840	7,561,449
Rent Expenses	101,947	5,483	1,955	7,281	103,252	219,918
Admin Expense	224,772	224,772	224,772	224,772	224,772	1,123,861
Insurance Expense	13,931	98,309	13,931	13,931	13,931	154,031
Services Cost	1,024,805	237,805	810,337	637,805	469,805	3,180,558
Software Expense	189,326	189,326	189,326	249,326	189,326	1,006,629
Travel Expenses	134,424	134,424	134,424	134,424	134,424	672,120
Marketing and Sales Expenses	47,485	47,485	47,485	47,485	47,485	237,425
Total Operating Expenses	\$ 6,973,884	\$ 25,834,802	\$ 5,432,690	\$ 7,187,821	\$ 5,063,172	\$ 50,492,369