

**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)

Re: Docket No. 88

**CERTIFICATE OF NO OBJECTION FOR EMERGENCY MOTION FOR ENTRY OF
AN ORDER AUTHORIZING ANKURA CONSULTING GROUP, LLC TO PROVIDE A
CHIEF RESTRUCTURING OFFICER TO THE DEBTOR EFFECTIVE AS OF
NOVEMBER 26, 2024**

1. On December 19, 2024, Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession in the above-captioned case (the “Debtor”), filed the *Debtor’s Emergency Motion for Entry of an Order Authorizing Ankura Consulting Group, LLC to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024* [Docket No. 88] (the “Motion”). Objections to the Motion were required to be filed and served on or prior to January 9, 2025 (the “Objection Deadline”).

2. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel hereby certifies that (i) the Objection Deadline for the Motion has passed, (ii) counsel for the Debtor conferred with both counsel for the United States Trustee and counsel from the Civil Division of the United States Department of Justice, and the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection or responsive pleading with respect to the Motion has been filed.

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



3. The proposed order (the “Proposed Order”) originally attached to the Motion is attached hereto as **Exhibit “A.”**

4. Therefore, the Debtor respectfully requests entry of the Proposed Order.

Dated: January 13, 2025

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.

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*Proposed Counsel to the Debtor and
Debtor-in-Possession*

CERTIFICATE OF SERVICE

This is to certify that I have on January 13, 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

Proposed Order

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,⁵

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**ORDER GRANTING DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF ISAAC LEE AS CHIEF
RESTRUCTURING OFFICER AND ANKURA CONSULTING GROUP, LLC AS
FINANCIAL AND RESTRUCTURING ADVISOR**

Upon consideration of the *Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Ankura Consulting Group, LLC as Financial and Restructuring Advisor* [Docket No. 47] (the "Retention Application"), the *Debtor's Supplement to Application for Entry of an Order Authorizing the Expansion of the Scope of the Services of Ankura Consulting Group, LLC to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024* [Docket No. 82] (the "Supplement"), and the *Emergency Motion for Entry of an Order Authorizing Ankura Consulting Group, LLC to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024* (the "Emergency Motion," together with the Retention Application and Supplement, the "Application")⁶ of the above-captioned debtor and debtor in possession (the "Debtor"); and upon the First Day Declaration and the Lee Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found

⁵ The last four digits of the Debtor's tax identification number in the jurisdiction in which it operates is 3572.

⁶ Capitalized terms used herein but not otherwise defined shall have the meaning given to them in the Retention Application, Supplement, or Emergency Motion, as applicable.

that (a) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (b) venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; (c) the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and (d) the Debtor's notice of the Application and opportunity for a hearing on the Application were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Application and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Application establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Application is granted on the terms set forth herein.
2. All objections to the Application or the relief requested therein that have not been made, withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits.
3. The Debtor is authorized to employ Ankura as its financial and restructuring advisor under §§ 327(a) and 328 of the Bankruptcy Code, to perform such services as detailed in the Application, with such employment effective as of the Petition Date.
4. The Debtor's appointment of Isaac Lee as its Chief Restructuring Officer, to perform such services as detailed in the Application and under the terms of the Engagement Letter and the Amended Engagement Letter, with such employment effective as of November 26, 2024, is approved.

5. All payments of professional fees and reimbursements of expenses to Ankura are subject to court approval based upon application to the Court and submission of contemporaneous time records, pursuant to Bankruptcy Rules and the BLR.

6. Service of the Application, the Lee Declaration, and the proposed order was sufficient notice to parties under the circumstances.

7. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062 and 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry

8. This Court shall retain exclusive jurisdiction to interpret and enforce the terms of this Order.

Dated: _____, 2025

Judge Christopher M. Lopez
United States Bankruptcy Judge