

**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, that the DOJ previously agreed to extend the Stipulation through and until January 31, 2025 [Docket

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



No. 95], and that DOJ has now further agreed to extend the Stipulation through and until February 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 May 31, 2025 to June 14, 2025, and the date in paragraph 6(a) of the Stipulation from January 17, 2025 to February 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 at this time as to the rebuttal letter to CMS dated October 11, 2024.

Dated: January 31, 2025

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.
Casey W. Doherty Jr.
1300 Post Oak Blvd.
Suite 650
Houston, TX 77056
Phone: (713) 658-4600
Email: casey.doherty@dentons.com

Samuel R. Maizel (admitted *pro hac vice*)
Tania M. Moyron (admitted *pro hac vice*)
601 S. Figueroa Street
Suite 2500
Los Angeles, CA 90017
Telephone: (213) 892-2910
Email: samuel.maizel@dentons.com
Email: tania.moyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

/s/ Augustus T. Curtis
(signed by permission)

KIRK T. MANHARDT

MARY A. SCHMERGEL

AUGUSTUS T. CURTIS

ANDREW WARNER

Commercial Litigation Branch

Civil Division

United States Department of Justice

P.O. Box 875

Ben Franklin Station

Washington D.C. 20044

Tel. (202) 598-7524

Email: augustus.t.curtis@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on January 31, 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

(Operating Budget)

Global Wound Care Medical Group and Wound Pros Management Group
2-Week Operating Budget
Period Ended February 15, 2025

WEEK ENDED	2/8/2025	2/15/2025	2 Week TOTAL
Biologics Product Expenses	\$ 20,957,672	\$ 4,667,054	\$ 25,624,726
Other Cost of good sold	849,278	385,677	1,234,954
Payroll Expense	2,745,246	551,050	3,296,297
Rent Expenses	103,786	1,643	105,429
Admin Expense	360,407	391,966	752,373
Insurance Expense	13,931	13,931	27,861
Services Cost	1,199,107	1,506,203	2,705,310
Software Expense	448,894	191,691	640,585
Travel Expenses	134,424	134,424	268,848
Marketing and Sales Expenses	497,485	47,485	544,970
Total Operating Expenses	\$ 27,310,229	\$ 7,891,123	\$ 35,201,353