

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

In re:

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

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**MOTION OF DEBTOR FOR ENTRY OF AN ORDER  
(I) ESTABLISHING DEADLINES AND PROCEDURES FOR  
FILING PROOFS OF CLAIM; (II) APPROVING FORM AND  
MANNER OF NOTICE THEREOF; AND (III) GRANTING RELATED RELIEF**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING. REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

Global Wound Care Medical Group, a Professional Corporation (the “Debtor”), the debtor and debtor in possession in the above-captioned case (the “Case”), hereby moves (the “Motion”) the United States Bankruptcy Court for the Southern District of Texas (the “Court”), pursuant to §§ 105(a), 501, 502, 503, 507, and 1111(a) of title 11 of the United States Code, §§ 101 *et seq.* (the “Bankruptcy Code”),<sup>2</sup> Rules 2002, 3001, 3003(c), and 5005(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3003-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), for entry of an order (substantially in the form attached hereto as **Exhibit A**, the “Proposed Order”): (a) establishing deadlines and procedures for filing proofs of claim in this

<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> All references to “§” or “section” herein are to sections of the Bankruptcy Code.

Case, (b) approving the form and manner of notice thereof, and (c) granting related relief.

### I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157(a) and 1334. Venue is proper in this district under 28 U.S.C. § 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. The predicates for the relief requested herein are: §§ 105(a), 501, 502, 503, 507, and 1111(a), Bankruptcy Rules 2002, 3001, 3003(c), and 5005(a), and Local Rule 3003-1.

### II. BACKGROUND

3. On October 21, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. The Debtor continues to operate its business and manage its property as a debtor in possession pursuant to §§ 1107 and 1108.

5. No trustee, examiner, or official committee has been appointed in this Case.

6. A description of the Debtor, its business, and the reasons for commencing this Case are set forth in greater detail in the *Declaration of Ralph Cetrulo in Support of the Chapter 11 Petition and First Day Motions* [Docket No. 8] (the "First Day Declaration"). The First Day Declaration is incorporated by reference herein.

### III. RELIEF REQUESTED

7. Pursuant to §§ 105(a), 501, 502, 503, 507, and 1111(a), Bankruptcy Rules 2002, 3001, 3003(c), and 5005(a), and Local Rule 3003-1, the Debtor respectfully requests entry of the Proposed Order: (a) establishing deadlines and procedures for filing proofs of claim in this Case, (b) approving the form and manner of notice thereof, and (c) granting related relief. The proposed deadlines (collectively, the "Bar Dates") are as follows:

- a. **April 8, 2025, at 5:00 p.m. (prevailing Central Time)** (the "General Bar Date") as the deadline for each "person" (as defined in § 101(41)), excluding governmental units (as defined in § 101(27), "Governmental Units"), to file a proof of claim (each, a "Proof of Claim") against the Debtor in respect of a prepetition "claim" (as defined in § 101(5)),

including, for the avoidance of doubt, secured claims, priority claims, and claims arising under § 503(b)(9);

- b. **April 21, 2025, at 5:00 p.m. (prevailing Central Time)** (the “Governmental Bar Date”) as the deadline for Governmental Units to file Proofs of Claim against the Debtor;
- c. If the debtor files an amendment (an “Amendment”) to any of the schedules of assets and liabilities and statements of financial affairs (the “Schedules”) and such amendment (i) reduces the undisputed, noncontingent, and liquidated amount of a claimant’s claim; (ii) changes the nature or characterization of a claimant’s claim; or (iii) adds a new claim with respect to a claimant to the Schedules, the affected claimant’s deadline to file a Proof of Claim or, to the extent necessary, amend any previously-filed Proof of Claim with respect to such amended claim shall be the later of (a) the General Bar Date or the Government Bar Date, as applicable, or (b) the date that is thirty (30) days after service of a notice on such affected claimant of the Amendment (the “Amended Schedule Bar Date”); and
- d. Except as otherwise set forth in any order authorizing rejection of an executory contract or unexpired lease, the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, or (ii) thirty (30) days after entry of any order authorizing the rejection of an executory contract or unexpired lease (the “Rejection Bar Date”), as the deadline to file a Proof of Claim relating to the Debtor’s rejection of such executory contract or unexpired lease.

8. The Debtor also requests that the Court approve the Debtor’s (i) proposed procedures for filing Proofs of Claim, (ii) proposed form of Proof of Claim attached as **Exhibit 1** to the Proposed Order (as defined below) (the “Proof of Claim Form”), and (iii) proposed procedures for providing notice of the Bar Dates, including (a) the proposed form of notice, substantially in the form attached as **Exhibit 2** to the Proposed Order, and (b) the proposed form of publication notice of the Bar Dates, substantially in the form attached as **Exhibit 3** to the Proposed Order (the “Publication Notice”).

9. A proposed form of the Proposed Order granting the relief requested herein is annexed hereto as **Exhibit A**.

10. The Debtor will cause its claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), to serve notice of the Bar Dates, substantially in the form attached to the Proposed Order as **Exhibit 2** (the “Bar Date Notice”), on all known persons and

entities holding potential claims against the Debtor or its estate. Verita will serve the Bar Date Package (as defined below) at least thirty (30) days prior to the General Bar Date.

11. In addition, although actual notice under the Bankruptcy Code need only be provided to known creditors, constructive notice may also be provided by publication notice in the national edition of the *USA Today* and the local editions of the *Houston Chronicle* and *The Los Angeles Times*.

**IV. ESTABLISHMENT OF THE BAR DATES IS APPROPRIATE**

12. Bankruptcy Rule 3003(c)(3) generally governs the filing of proofs of claim in a chapter 11 case and provides in relevant part: “[t]he court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed.” Fed. R. Bankr. P. 3003(c)(3). Also, Paragraph M.32 of the *Procedures for Complex Cases in the Southern District of Texas* (effective Oct. 18, 2023) (the “Complex Procedures”)<sup>3</sup> establishes the default rule that an entity, other than a Governmental Unit, must file a proof of claim in a chapter 11 case within ninety (90) days after the first date set for the meeting of creditors under 11 U.S.C. § 341(a) and that a Governmental Unit must file a proof of claim within one hundred eighty (180) days after the petition date, unless the Court orders otherwise. Bankruptcy Rule 2002(a)(7) generally provides that all parties in interest must receive twenty-one (21) days’ notice of the time fixed for filing proofs of claim pursuant to Bankruptcy Rule 3003(c). Bankruptcy Rule 2002(p)(2) requires at least thirty (30) days’ notice to creditors with a foreign address.

13. Although the Complex Procedures establish a bar date by default, Bankruptcy Local Rule 3003-1, the Complex Procedures, and Bankruptcy Rule 3003(c)(3) give the Court authority to establish a different bar date for all non-governmental entities. The Debtor seeks to establish the General Bar Date to facilitate administration of this Case. Moreover, the Debtor proposes to give creditors at least thirty (30) days’ notice of the applicable Bar Dates. Therefore,

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<sup>3</sup> Available at [https://www.txs.uscourts.gov/sites/txs/files/Complex\\_11\\_Procedures\\_01032023.pdf](https://www.txs.uscourts.gov/sites/txs/files/Complex_11_Procedures_01032023.pdf).

creditors will have adequate time to review the Schedules, which were filed on December 4, 2024 [Docket Nos. 75 and 76], and their own records and, if necessary, file a Proof of Claim.

14. The Debtor requires complete and accurate information regarding the nature, validity, amount, and status of all claims against the Debtor that will be asserted in this Case. The Debtor seeks to establish the Bar Dates to determine what claims may be asserted against them in addition to those listed in the Schedules. For these reasons, the Bar Dates and the form and manner of notice proposed in this Motion are appropriate and should be approved. Nevertheless, the Debtor requests that it be permitted (but not required) to extend any of the Bar Dates on behalf of a requesting claimant, upon the Debtor's determination, in its reasonable business judgment, that such extension is warranted or appropriate.

**A. The General Bar Date**

15. The Debtor requests that the Court establish **April 8, 2025, at 5:00 p.m. (prevailing Central Time)** as the General Bar Date for all persons and entities (excluding Governmental Units) holding prepetition potential claims against the Debtor or its estate that arose or are deemed to have arisen prior to the Petition Date, including secured claims, priority claims, and claims arising under § 503(b)(9). The General Bar Date will ensure that potential creditors receive more than adequate notice of the deadlines for filing Proofs of Claim in this Case.

16. The General Bar Date would be the date by which all persons and entities (excluding Governmental Units) holding prepetition claims against the Debtor or its estate must file Proofs of Claim unless they fall within one of the exceptions set forth in this Motion. Subject to these exceptions, the General Bar Date would apply to all persons or entities holding claims against the Debtor that arose or are deemed to have arisen prior to the Petition Date, including secured claims, priority claims, and claims arising under § 503(b)(9).

**B. The Governmental Bar Date**

17. The Debtor requests that the Court establish **April 21, 2025, at 5:00 p.m. (prevailing Central Time)** as the Governmental Bar Date for all known Governmental Units entities holding potential claims against the Debtor or its estate. The proposed Governmental Bar

Date is at least one hundred eighty (180) days from the Petition Date, as required under § 502(b)(9)(A). *See* 11 U.S.C. § 502(b)(9)(A) (“A claim of a governmental unit shall be timely filed if it is filed before 180 days after the date of the order for relief or such later time as the [Bankruptcy Rules] may provide.”).

18. The Governmental Bar Date applies to all Governmental Units holding claims against the Debtor (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including Governmental Units with claims against the Debtor for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtor was a party. All Governmental Units holding such claims against the Debtor would be required to file Proofs of Claim so that such Proofs of Claim are actually received by Verita by the Governmental Bar Date.

**C. Amended Schedules Bar Date**

19. If, on or after the date on which the Debtor serves the Bar Date Packages, the Debtor files an Amendment to its Schedules (i) to reduce the undisputed, noncontingent, and liquidated amount of a claim; (ii) to change the nature or characterization of a claim; or (iii) to add a new claim to the Schedules, the Debtor proposes that the affected claimant’s deadline to file a Proof of Claim or, to the extent necessary, amend any previously filed Proof of Claim in respect of the amended scheduled claim, shall be on or prior to the Amended Schedule Bar Date. Notwithstanding the foregoing, nothing contained herein will preclude the Debtor or any other party in interest from objecting to any claim, whether scheduled or filed, on any grounds.

**D. Other Extensions**

20. The Debtor further requests that it be permitted (but not required) to extend any of the Bar Dates on behalf of a requesting claimant if, upon the Debtor’s determination, such extension is warranted or appropriate.

**E. Rejection Bar Date**

21. The Debtor anticipates that certain persons or entities may assert claims in connection with the Debtor’s rejection of executory contracts or unexpired leases pursuant to § 365

(“Rejection Damages Claims”). The Debtor requests that the Court establish the Rejection Bar Date as the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, or (ii) thirty (30) days after the entry of an order of the Court authorizing the Debtor’s rejection of the applicable executory contract or unexpired lease.

**V. PROCEDURES FOR FILING PROOFS OF CLAIM**

22. The Debtor proposes to establish procedures that provide a streamlined process for creditors to file Proof(s) of Claim, set forth adequate instructions regarding the process by which a creditor may properly file Proof(s) of Claim, and exempt certain parties from filing Proof(s) of Claim. The proposed procedures will help ensure the Debtor achieves certainty with respect to its liabilities in a timely and organized manner. The proposed procedures (the “Procedures”) are as follows:

**A. Form of Proof of Claim**

23. Each Proof of Claim must: (i) be legible; (ii) include 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 to the Proof of Claim Form 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.

24. All Proofs of Claim must be actually received by Verita no later than the applicable Bar Date, either by the claimant (i) submitting such Proof(s) of Claim electronically through Verita, at <https://www.veritaglobal.net/gwc>; (ii) filing such Proof(s) of Claim electronically through PACER (Public Access to Court Electronic Records), at <https://ecf.txs.uscourts.gov>; or (iii) 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**

25. Proofs of Claim will be deemed to be filed when filing via PACER is completed or when actually received by Verita. Any facsimile or electronic mail submissions will not be accepted and will not be deemed to be filed until a claim is submitted by one of the methods described above. Claimants submitting a Proof of Claim through non electronic means wishing to receive acknowledgment that its Proofs of Claim were received by Verita must submit (i) a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita), and (ii) a self-addressed, stamped envelope.

**B. Evidence of Claim Validity and Amount**

26. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d). If, however, such documentation is either voluminous or unavailable, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available, as applicable; *provided that*, any creditor shall be required to transmit such documentation, if available, to Debtor's counsel upon request no later than ten (10) days from the date of such request.

27. Any Proof of Claim asserting a claim entitled to priority under § 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtor in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtor under § 546(c) (if applicable).

**C. Parties Not Required to File Proofs of Claim**

28. The Debtor proposes that the following persons and entities *not be required* to file Proofs of Claim in this Case (the "Excluded Claims"):

- 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 507(a)(2) as an administrative expense (other than any claim allowable under § 503(b)(9)), 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, 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)) 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, 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.

**D. Consequences of Failure to File a Proof of Claim**

29. The Debtor proposes that, pursuant to Bankruptcy Rule 3003(c)(2), any person or entity that is required to timely file a Proof of Claim in the form and manner specified in the Proposed Order and who fails to do so on or before the applicable Bar Date associated with such claim (i) shall be forever barred, estopped, and enjoined from asserting such claim against the Debtor or thereafter filing a Proof of Claim with respect thereto in this Case; (ii) shall not, with respect to such claim, be treated as a creditor of the Debtor for the purpose of voting on any plan in this Case; and (iii) shall not receive or be entitled to receive any payment or distribution of property from the Debtor or its successors or assigns with respect to such claim in this Case. For the avoidance of doubt, except with respect to an Excluded Claim, each person or entity MUST file a Proof of Claim in accordance with the Procedures by the Bar Date applicable to such claimant in order to preserve its claim(s).

**VI. PROCEDURES FOR PROVIDING NOTICE OF BAR DATES**

30. The Debtor proposes the following procedures for providing mailing and publication notice of the Bar Dates.

**A. Mailing and Publication of Bar Date Notices**

31. To provide adequate notice to creditors pursuant to Bankruptcy Rule 2002(a)(7) and (f), the Debtor proposes to serve the Bar Date Notice, together with a copy of the Proof of Claim Form (collectively the "Bar Date Package"), by first class United States mail, postage prepaid (or equivalent service), to the following persons and entities:

- a. The Office of the United States Trustee for Region 7;
- b. All creditors and other known holders of claims against the Debtor as of the date of entry of the Proposed Order, including all entities listed in the Schedules as holding claims against the Debtor;
- c. All parties that have requested notice in this Case pursuant to Bankruptcy Rule 2002 as of the date of the entry of the Proposed Order;
- d. All entities that have already filed Proofs of Claim in this Case as of the date of entry of the Proposed Order;

- e. All entities who are party to executory contracts and unexpired leases with the Debtor;
- f. All entities who are party to litigation with the Debtor;
- g. All employees who are currently employed by the Debtor, or were employed by the Debtor in the last two and a half years;
- h. All regulatory authorities that regulate the Debtor's business;
- i. The Offices of the Attorney General for each of the states in which the Debtor operates;
- j. All known non-Debtor equity and interest holders of the Debtor as of the date the Proposed Order is entered;
- k. All taxing authorities for the jurisdictions in which the Debtor maintains or conducts business;
- l. The Securities and Exchange Commission; and
- m. Proposed counsel to the any creditors' committee appointed in this Case.

32. The Debtor proposes to serve the Bar Date Package within five (5) business days after entry of the Bar Date Order. The proposed Bar Date Notice notifies parties of (i) the Bar Dates; (ii) who must file a Proof of Claim on account of a prepetition claim; (iii) the Procedures for filing a Proof of Claim on account of a prepetition claim; (iv) the consequences of failing to timely file a Proof of Claim on account of a prepetition claim; and (v) where parties can find further information with respect to this Case. The Debtor requests that service of the Bar Date Notice be deemed to constitute good and sufficient notice of the Bar Dates in accordance with Bankruptcy Rule 2002(a)(7).

33. Furthermore, the Debtor is authorized to provide notice of the General Bar Date to potential unknown creditors by causing a copy of the notice attached to the Proposed Order as **Exhibit 3** (the "Publication Notice") to be published in the national edition of the *USA Today* and the local editions of the *Houston Chronicle* and *The Los Angeles Times*. In addition, Verita will

prominently display the Bar Date Notice, the Bar Dates, and the Bar Date Order on the Case website at: <https://www.veritaglobal.net/gwc>.

**B. Supplemental Mailings**

34. After the initial mailing of the Bar Date Package, the Debtor may, in its discretion, make supplemental mailings of notices, including in the event that: (a) notices are returned by the post office with forwarding addresses; (b) certain parties acting on behalf of parties in interest (e.g., banks and brokers with respect to equity holders) decline to pass along notices to these parties and instead return their names and addresses to the Debtor for direct mailing; and (c) additional potential claimants or parties in interest become known after the initial mailing of the Bar Date Package.

35. In this regard, the Debtor requests that the Court permit the Debtor to make supplemental mailings of the Bar Date Package in these and similar circumstances as soon as reasonably practicable after entry of the Proposed Order, with any such mailings deemed timely and the Bar Date being applicable to the recipient creditors. To the extent that any notices are returned as “return to sender” without a forwarding address, the Debtor respectfully requests that it should not be required to mail additional notices to such creditors.

**VII. BASIS FOR RELIEF**

36. The Bar Date Notice and the Publication Notice (i) set forth the General Bar Date and Governmental Bar Date, as applicable; (ii) advise creditors under what circumstances they must file a Proof of Claim in this Case; (iii) alert the Debtor’s creditors to the consequences of failing to file a timely Proof of Claim; (iv) set forth the address to which Proofs of Claim must be sent for filing; and (v) notify creditors that facsimile or email filings of Proofs of Claim are not acceptable and are not valid for any purpose. The Debtor submits that the Bar Date Notice and the Publication Notice will provide known and unknown creditors with sufficient information to file properly prepared and executed Proofs of Claim in a timely manner.

37. The Debtor must ensure that creditors and other interested parties receive adequate and appropriate notice of the Bar Dates. To determine the adequacy of notice given to a creditor,

bankruptcy law distinguishes between “known” and “unknown” creditors. *See Williams v. Placid Oil Co. (In re Placid Oil Co.)*, 753 F.3d 151, 154 (5th Cir. 2014). “[K]nown creditors must be provided with actual written notice of a debtor’s bankruptcy filing and bar claims date.” *Chemetron Corp. v. Jones (In re Chemetron Corp.)*, 72 F.3d 341, 345 (3d Cir. 1995). For “unknown creditors,” a debtor need only provide constructive notice by publication. *In re Placid Oil*, 753 F.3d at 155 (citations omitted). A “known” creditor is one whose identity is either known or is “reasonably ascertainable by the debtor.” *Id.* (citing *Tulsa Prof’l Collection Serv., Inc. v. Pope*, 485 U.S. 478, 489–90 (1988)). An “unknown” creditor is one whose “interests are either conjectural or future or, although they could be discovered upon investigation, do not in due course of business come to knowledge [of the debtor].” *Id.* at 156 (quoting *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 317 (1950)). As for the particular efforts a debtor must exert to identify known creditors, “[w]hether a creditor received adequate notice of a bar date depends upon the facts and circumstances of a given case.” *In re Grand Union Co.*, 204 B.R. 864, 871 (Bankr. D. Del. 1997) (quoting *Oppenheim, Appel, Dixon & Co. v. Bullock (In re Robintech, Inc.)*, 863 F.2d 393, 396 (5th Cir. 1989), *cert. denied*, 493 U.S. 811 (1989)).

38. The Debtor submits that the proposed notice procedures with respect to the Bar Dates satisfy the *Placid Oil* standard. Through the process of completing the Schedules, the Debtor identified those persons and entities that are known to the Debtor to hold claims against the Debtor, or are likely to be potential holders of claims. The Schedules were prepared following careful review of the Debtor’s books and records.

39. The Publication Notice that the Debtor may publish has been tailored to provide notice of the Bar Dates on an extensive basis. The Debtor believes that the Publication Notice is reasonably designed to provide any unknown claimants that may potentially hold claims against the Debtor with adequate notice of the Bar Dates. In addition, the Debtor believes that the Publication Notice constitutes good and sufficient notice to “unknown” creditors, as defined by the Fifth Circuit in *Placid Oil*. As such, the Debtor respectfully requests that the Court find that no additional notice is necessary.

40. Pursuant to § 105(a), “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a); *see also In re Chinichian*, 784 F.2d 1440, 1443 (9th Cir. 1986) (“Section 105 sets out the power of the bankruptcy court to fashion orders as necessary pursuant to the purpose of the Bankruptcy Code.”). Here, the Court’s application of § 105(a) is appropriate to achieve administrative and judicial efficiency.

41. The Procedures and notice periods described herein afford creditors ample opportunity and instruction to properly file Proofs of Claim in a streamlined fashion, while at the same time ensuring that the Debtor can achieve certainty with respect to their liabilities in a timely manner and emerge from chapter 11 as expeditiously as possible. Courts in this district routinely fix similar bar dates for filing Proofs of Claim in comparable chapter 11 cases. *See, e.g., In re Core Scientific, Inc.*, No. 22-90341 (DRJ) (Bankr. S.D. Tex. Mar. 9, 2023) (Docket No. 652); *In re Serta Simmons Bedding, LLC*, No. 23-90020 (DRJ) (Bankr. S.D. Tex. Jan. 24, 2023) (Docket No. 104); *In re Talen Energy Supply, LLC*, No. 22-90054 (MI) (Bankr. S.D. Tex. June 27, 2022) (Docket No. 792); *In re Basic Energy Services, Inc.*, No. 21-90002 (DRJ) (Bankr. S.D. Tex. Oct. 4, 2021) (Docket No. 475); *In re CBL & Associates Properties, Inc.*, No. 20-35226 (DRJ) (Bankr. S.D. Tex. Nov. 1, 2020) (Docket No. 902); *In re CEC Entertainment, Inc.*, No. 20-33163 (MI) (Bankr. S.D. Tex. Aug. 28, 2020) (Docket No. 747); *In re NPC International, Inc.*, No. 20-33353 (DRJ) (Bankr. S.D. Tex. Aug. 26, 2020) (Docket No. 513); *In re SpeedCast International, Ltd.*, No. 20-32243 (MI) (Bankr. S.D. Tex. Apr. 23, 2020) (Docket No. 301). Similar relief is also appropriate here.

### **VIII. RESERVATION OF RIGHTS**

42. Nothing contained herein is intended to be or shall be deemed as (i) an implication or admission as to the validity of any claim against the Debtor, (ii) a waiver or limitation of the Debtor’s or any party in interest’s rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtor’s or any other party in interest’s rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) a waiver of the obligation of any party in interest to file a proof of claim, (v) an agreement or obligation to pay any claims, (vi) a waiver of

any claims or causes of action which may exist against any creditor or interest holder, (vii) an admission as to the validity of any liens, or (viii) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under § 365. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtor's or any other party in interest's rights to dispute such claim subsequently.

**IX. NOTICE**

43. The Debtor has provided notice of this Motion to the following parties or their respective counsel: (a) the U.S. Trustee for the Southern District of Texas; (b) the holders of the twenty (20) largest unsecured claims against the Debtor; (c) the Office of the United States Attorney for the Southern District of Texas; (d) the United States, acting by and through the Secretary of the Department of Health & Human Services and the Centers for Medicare & Medicaid Services; (e) the Attorney General of the United States; and (f) any party that has appeared electronically in this Case and/or requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtor submits that no other or further notice is required.

**X. NO PRIOR REQUEST**

44. No prior request for the relief sought in this Motion has been made to this Court or any other Court.

*[Remainder of page left intentionally blank]*

**XI. CONCLUSION**

WHEREFORE, the Debtor respectfully requests entry of the Proposed Order: (i) granting the relief requested herein; and (ii) granting the Debtor such other and further relief as the Court deems just and proper.

Dated: February 7, 2025

Respectfully submitted,

/s/ Casey W. Doherty, Jr.

Casey W. Doherty, Jr.

Dentons US LLP

1300 Post Oak Blvd.

Suite 650

Houston, TX 77056

Phone: (713) 658-4600

Email: [casey.doherty@dentons.com](mailto:casey.doherty@dentons.com)

-and-

Samuel R. Maizel (*pro hac vice*)

Tania M. Moyron (*pro hac vice*)

Dentons US LLP

601 S. Figueroa Street

Suite 2500

Los Angeles, CA 90017

Phone: (213) 892-2910

Email: [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)

[tania.moyron@dentons.com](mailto:tania.moyron@dentons.com)

*Counsel to the Debtor and Debtor in Possession*



**CERTIFICATE OF ACCURACY**

This is to certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to LBR 9013-1(i).

*/s/ Casey W. Doherty, Jr.*

\_\_\_\_\_

Casey W. Doherty, Jr.

**CERTIFICATE OF SERVICE**

This is to certify that I have on February 7, 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.*

\_\_\_\_\_

Casey W. Doherty, Jr.

**EXHIBIT A**

(Proposed Form of 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,<sup>1</sup>

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**ORDER GRANTING MOTION OF DEBTOR FOR ENTRY OF AN ORDER  
(I) ESTABLISHING DEADLINES AND PROCEDURES FOR  
FILING PROOFS OF CLAIM; (II) APPROVING FORM AND  
MANNER OF NOTICE THEREOF; AND (III) GRANTING RELATED RELIEF**

Upon consideration of the Motion<sup>2</sup> of Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the “Debtor”) in the above-captioned case (the “Case”) for entry of an order (this “Order”), pursuant to §§ 105(a), 501, 502, 503, 507, and 1111(a) of title 11 of the United States Code, §§ 101 et seq. (the “Bankruptcy Code”),<sup>3</sup> Rules 2002, 3001, 3003(c), and 5005(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3003-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Southern District of Texas (the “Local Rules”), for entry of this Order: (a) establishing deadlines and procedures for filing proofs of claim<sup>4</sup> in this Case, (b) approving the form and manner of notice thereof, and (c) granting related relief, all as more fully set forth in the Motion; and upon the record in this Case; and this Court having jurisdiction over this matter pursuant to 28

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<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 not otherwise defined herein shall have the meanings ascribed to them in the Motion.

<sup>3</sup> All references to “§” or “section” herein are to sections of the Bankruptcy Code.

<sup>4</sup> Except as otherwise defined herein and in the Motion, all terms specifically defined in the Bankruptcy Code have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term “claim” has the meaning given to it in § 101(5); (b) the term “entity” has the meaning given to it in § 101(15); (c) the term “governmental unit” has the meaning given to it in § 101(27); and (d) the term “person” has the meaning given to it in § 101(41).

U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being core under 28 U.S.C. § 157(b); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estates, its creditors, and other parties in interest; and this Court having reviewed the Motion; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and this Court having found that the Debtor's notice of the Motion and opportunity for hearing on the Motion were appropriate under the circumstances and that no other notice be provided; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing thereon establish just cause for the relief granted herein; and upon all of the proceedings before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. Except as explicitly extended or modified pursuant to the Procedures outlined in this Order, (i) the General Bar Date is **April 8, 2025, at 5:00 p.m. (prevailing Central Time)**, as established by this Court pursuant to this Order and (ii) the Governmental Bar Date is **April 21, 2025 at 5:00 p.m. (prevailing Central Time)**, as established pursuant to Bankruptcy Local Rule 3003-1.

2. The Debtor may agree to extend the Bar Dates on behalf of a requesting claimant following consultation with the Consultation Parties.

3. Each Proof of Claim must: (i) be legible; (ii) include 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 to the Proof of Claim form provided by the Debtor, substantially in the form attached to this Order as **Exhibit 1** (the "Proof of Claim Form") 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.

4. If, on or after the date on which the Debtor serves the Bar Date Packages, the Debtor amends or supplements its Schedules (i) to reduce the undisputed, noncontingent, and liquidated amount of a claim; (ii) to change the nature or characterization of a claim; or (iii) to add a new claim to the Schedules, the affected claimant shall file a Proof of Claim or, to the extent necessary, amend any previously filed Proof of Claim in respect of the amended scheduled claim, in accordance with the procedures described herein so that it is received, as provided in paragraph six (6) below, by claims and noticing agent, Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), on or before the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, or (b) thirty (30) days after the claimant is served with notice of the applicable amendment or supplement to the Schedules (the “Amended Schedule Bar Date”).

5. Proofs of Claim in connection with Rejection Damages Claims shall be filed so that they are received, as provided in paragraph 6 below, by Verita on or before the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) thirty (30) days after the entry of an order of this Court authorizing the Debtor’s rejection of the applicable executory contract or unexpired lease (including any order confirming the Debtor’s plan of reorganization) (the “Rejection Bar Date”).

6. All Proofs of Claim must be actually received by Verita no later than the applicable Bar Date, either by the claimant (i) filing such Proof(s) of Claim electronically through Verita, at <https://www.veritaglobal.net/gwc>; (ii) filing such Proof(s) of Claim electronically through PACER (Public Access to Court Electronic Records), at <https://ecf.txs.uscourts.gov>; or (iii) delivering the original Proof(s) of Claim to Verita by first class mail, overnight mail, or hand delivery, to the following address:

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

7. Verita will not accept Proofs of Claim by facsimile, telecopy, email, or other electronic submission, other than as specifically provided herein.

8. Claimants submitting a Proof of Claim through non-electronic means wishing to receive acknowledgment that their Proofs of Claim were received by Verita must submit a (i) copy of the Proof of Claim Form (in addition to the original Proof of Claim Form sent to Verita) and (ii) self-addressed, stamped envelope.

9. The following persons and entities may, but are ***not required to***, file Proofs of Claim in this Case:

- 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 507(a)(2) as an administrative expense (other than any claim allowable under § 503(b)(9)), 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, 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)) 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, 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.

10. Proofs of Claim signed electronically by the claimant or an authorized agent or legal representative of the claimant may be deemed acceptable for purposes of claims administration.

11. Each Proof of Claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d). If, however, such documentation is either voluminous or unavailable, such Proof of Claim may include a summary of such documentation or an explanation as to why such documentation is not available, as applicable; provided that any creditor shall be required to transmit such documentation, if available, to Debtor's counsel upon request no later than ten (10) days from the date of such request.

12. Any Proof of Claim asserting a claim entitled to priority under § 503(b)(9) must also: (i) include the value of the goods delivered to and received by the Debtor in the twenty (20) days prior to the Petition Date; (ii) attach any documentation identifying the particular invoices for which the 503(b)(9) claim is being asserted; and (iii) attach documentation of any reclamation demand made to the Debtor under § 546(c) (if applicable).

13. Except to the extent otherwise provided in a further order of this Court, any person or entity that is required to timely file a Proof of Claim in the form and manner specified by this

Order and who fails to do so on or before the Bar Date associated with such claim (i) shall be forever barred, estopped, and enjoined from asserting such claim against the Debtor or thereafter filing a Proof of Claim with respect thereto in this Case; (ii) shall not, with respect to such claim, be treated as a creditor of the Debtor for the purpose of voting on any plan in this Case; and (iii) shall not receive or be entitled to receive any payment or distribution of property from the Debtor or its successors or assigns with respect to such claim in this Case.

14. The Proof of Claim Form, substantially in the form attached to this Order as **Exhibit 1**, the Bar Date Notice, substantially in the form attached to this Order as **Exhibit 2**, and the Publication Notice, substantially in the form attached to this Order as **Exhibit 3**, are each hereby approved in all respects.

15. Within five (5) business days after entry of this Order, the Debtor shall cause Verita to serve the Bar Date Notice, together with a Proof of Claim Form (collectively the “Bar Date Package”) by first class United States mail, postage prepaid (or equivalent service), to the following persons and entities:

- a. The Office of the United States Trustee for Region 7;
- b. All creditors and other known holders of claims against the Debtor as of the date of entry of the Proposed Order, including all entities listed in the Schedules as holding claims against the Debtor;
- c. All parties that have requested notice in this Case pursuant to Bankruptcy Rule 2002 as of the date of the entry of the Proposed Order;
- d. All entities that have already filed Proofs of Claim in this Case as of the date of entry of the Proposed Order;
- e. All entities who are party to executory contracts and unexpired leases with the Debtor;
- f. All entities who are party to litigation with the Debtor;
- g. All employees who are currently employed by the Debtor, or were employed by the Debtor in the last two and a half years;
- h. All regulatory authorities that regulate the Debtor’s business;



- i. The Offices of the Attorney General for each of the states in which the Debtor operates;
- j. All known non-Debtor equity and interest holders of the Debtor as of the date the Proposed Order is entered;
- k. All taxing authorities for the jurisdictions in which the Debtor maintains or conducts business;
- l. The Securities and Exchange Commission; and
- m. Proposed counsel to the any creditors' committee appointed in this Case.

16. The Debtor is authorized to publish the Publication Notice in the national edition of the *USA Today* and the local editions of the *Houston Chronicle* and *The Los Angeles Times*, as soon as practicable following entry of this Order, which Publication Notice is hereby approved in all respects and which shall be deemed good, adequate, and sufficient notice of the Bar Dates by publication.

17. The Debtor is permitted, but not required, to make supplemental mailings of the Bar Date Package. To the extent that any Bar Date Packages are returned as "return to sender" without a forwarding address, the Debtor is not required to mail additional notices to such creditors or parties in interest, as applicable.

18. The Proof of Claim Form is hereby approved in all respects. The Debtor shall provide each of the creditors listed on the Schedules with a Proof of Claim form.

19. The Debtor will cause Verita to prominently display the Bar Date Notice, the Bar Dates, and this Order on the Case website at <https://www.veritaglobal.net/gwc>.

20. The Bar Date Notice shall be deemed good, adequate, and sufficient notice of the relief granted by this Order to all known creditors of the Debtor if it is served, together with the Proof of Claim Form, as set forth in this Order and in the manner set forth herein, no later than thirty (30) days before the General Bar Date upon all known persons and entities holding potential claims against the Debtor.

21. Nothing contained in the Motion or this Order or any payment made pursuant to

the authority granted by this Order is intended to be or shall be deemed as (i) an implication or admission as to the validity of any claim against the Debtor, (ii) a waiver of the Debtor's or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtor's or any party in interest's rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) a waiver of the obligation of any party in interest to file a proof of claim, (v) an agreement or obligation to pay any claims, (vi) a waiver of any claims or causes of action which may exist against any creditor or interest holder, (vii) an admission as to the validity of any liens, or (viii) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under § 365.

22. The Debtor is authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.

23. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_, 2025

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Christopher M. Lopez  
United States Bankruptcy Judge

**EXHIBIT 1**

(Proof of Claim Form)

Your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/gwc>

**Fill in this information to identify the case:**

Debtor Global Wound Care Medical Group, a Professional Corporation  
 United States Bankruptcy Court for the Southern District of Texas, Houston Division  
 Case number 24-34908 (CML)

**Modified Official Form 410  
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

**Part 1: Identify the Claim**

<p>1. <b>Who is the current creditor?</b></p>	<p>_____</p> <p>Name of the current creditor (the person or entity to be paid for this claim)</p> <p>Other names the creditor used with the debtor _____</p>	
<p>2. <b>Has this claim been acquired from someone else?</b></p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. From whom? _____</p>	
<p>3. <b>Where should notices and payments to the creditor be sent?</b></p> <p>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</p>	<p><b>Where should notices to the creditor be sent?</b></p> <p>_____</p> <p>Name</p> <p>_____</p> <p>Number Street</p> <p>_____</p> <p>City State ZIP Code</p> <p>_____</p> <p>Country</p> <p>Contact phone _____</p> <p>Contact email _____</p> <p>Uniform claim identifier for electronic payments in chapter 13 (if you use one):</p> <p>_____</p>	<p><b>Where should payments to the creditor be sent? (if different)</b></p> <p>_____</p> <p>Name</p> <p>_____</p> <p>Number Street</p> <p>_____</p> <p>City State ZIP Code</p> <p>_____</p> <p>Country</p> <p>Contact phone _____</p> <p>Contact email _____</p>
<p>4. <b>Does this claim amend one already filed?</b></p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____</p> <p style="text-align: right;">MM / DD / YYYY</p>	
<p>5. <b>Do you know if anyone else has filed a proof of claim for this claim?</b></p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Who made the earlier filing? _____</p>	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_ \_

7. How much is the claim? \$ \_\_\_\_\_ Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.  
 \_\_\_\_\_

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_%  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

- No
- Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

- Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ \_\_\_\_\_
- Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ \_\_\_\_\_
- Wages, salaries, or commissions (up to \$15,150\* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ \_\_\_\_\_
- Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ \_\_\_\_\_
- Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ \_\_\_\_\_
- Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies. \$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

- No
- Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date \_\_\_\_\_  
MM / DD / YYYY

\_\_\_\_\_  
Signature

**Print the name of the person who is completing and signing this claim:**

Name \_\_\_\_\_  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_  
Number Street

City State ZIP Code Country

Contact phone \_\_\_\_\_ Email \_\_\_\_\_

## Modified Official Form 410

# Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571

### PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

GWC Claims Processing Center  
c/o KCC dba Verita Global  
222 N. Pacific Coast Hwy., Ste. 300  
El Segundo, CA 90245

Alternatively, your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/gwc>

### How to fill out this form

- **Fill in all of the information about the claim as of the date the case was filed.**
  
- **Fill in the caption at the top of the form**
  
- **If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.**
  
- **Attach any supporting documents to this form.**  
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)  
  
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).
  
- **Do not attach original documents because attachments may be destroyed after scanning.**
  
- **If the claim is based on delivery health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.**

- **A Proof of Claim form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth.** See Bankruptcy Rule 9037.
  
- **For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.**  
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

### Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <https://www.veritaglobal.net/gwc>

### Understand the terms used in this form

**Administrative expense:** Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing that bankruptcy estate.  
11 U.S.C. § 503

**Claim:** A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (5). A claim may be secured or unsecured.

**Claim Pursuant to 11 U.S.C. §503(b)(9):** A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

**Debtor:** A person, corporation, or other entity to who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

**Evidence of perfection:** Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Priority claim:** A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

**Proof of claim:** A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

**Redaction of information:** Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

**Do not file these instructions with your form.**

**Secured claim under 11 U.S.C. §506(a):** A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

**Setoff:** Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

**Uniform claim identifier:** An optional 24-character identifier that some creditors use to facilitate electronic payment.

**Unsecured claim:** A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

### Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.



**EXHIBIT 2**

(Bar Date Notice)

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

In re:

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

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**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 "Petition Date"), Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the "Debtor") in the above-captioned case (the "Case") filed a voluntary petition for relief under chapter 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of Texas (the "Court").

**BAR DATES**

2. On [●], 2025, the Court entered an order [Docket No. ●] (the "Bar Date Order")<sup>2</sup> pursuant to which the Court established **April 8, 2025, at 5:00 p.m. (prevailing Central Time)** (the "General Bar Date") 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 unites (the "Governmental Bar Date" and, together with the General Bar Date, the "Bar Dates").

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

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<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 **MUST** 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.

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 “Excluded Claims”). 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

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<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 "Amendment") to any of the schedules of assets and liabilities and statements of financial affairs (collectively, the "Schedules") 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:**

10. If you file a proof of claim, your filed proof of claim must (i) be legible; (ii) include 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. You can file your proof(s) of claim (i) electronically through Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), at <https://www.veritaglobal.net/gwc>; (ii) electronically through PACER (Public Access to Court Electronic Records), at <https://ecf.txsb.uscourts.gov>; 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**

13. *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:**

14. **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:**

15. 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 <https://www.veritaglobal.net/gwc>, 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:**

16. Proof of claim forms and a copy of the Bar Date Order may be obtained by visiting Verita's website at <https://www.veritaglobal.net/gwc>. 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 <https://www.veritaglobal.net/GWC/inquiry> 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.**

**EXHIBIT 3**

(Publication Notice)

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

In re:

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

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**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 OF THE FOLLOWING:**

1. Commencing on October 21, 2024 (the “Petition Date”), Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the “Debtor”) in the above-captioned case (the “Case”) filed a voluntary petition for relief under chapter 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. On [●], 2025, the Court entered an *Order (I) Establishing Deadlines and Procedures for Filing Proofs of Claim, (II) Approving Form and Manner of Notice Thereof, and (III) Granting Related Relief* [Docket No. ●] (the “Bar Date Order”).<sup>2</sup>

3. Pursuant to the Bar Date Order, all persons, entities, and governmental units who have a claim or potential claim, including any claims under § 503(b)(9) of the Bankruptcy Code,<sup>3</sup> against the Debtor that arose prior to the Petition Date, no matter how remote or contingent such right to payment or equitable remedy may be, **MUST FILE A PROOF OF CLAIM**, so as to be received on or before **April 8, 2025, at 5:00 p.m. (prevailing Central Time)** for general creditors (the “General Bar Date”) and **April 21, 2025 at 5:00 p.m. (prevailing Central Time)** for

<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.

<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.



governmental units (the “Governmental Bar Date,” and together with the General Bar Date, the “Bar Dates”), by (i) filing such Proof(s) of Claim electronically through Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), at <https://www.veritaglobal.net/gwc>; (ii) filing such Proof(s) of Claim electronically through PACER (Public Access to Court Electronic Records), at <https://ecf.txsb.uscourts.gov>; or (iii) mailing the original Proof(s) of Claim to Verita at the following address:

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

**PROOFS OF CLAIM SENT BY FACSIMILE OR E-MAIL WILL NOT BE ACCEPTED.**

4. The Bar Dates apply to all claims against the Debtor arising under § 503(b)(9) of the Bankruptcy Code; *provided, however*, that the Bar Dates do not apply to the Excluded Claims listed in paragraph 9 of the Bar Date Order.

5. **ANY PERSON OR ENTITY (EXCEPT A PERSON OR ENTITY WHO IS EXCUSED BY THE TERMS OF THE BAR DATE ORDER) WHO FAILS TO FILE A PROOF OF CLAIM ON OR BEFORE THE APPLICABLE BAR DATE IN ACCORDANCE WITH THE INSTRUCTIONS ABOVE WILL NOT BE TREATED AS A CREDITOR FOR PURPOSES OF VOTING UPON, OR RECEIVING DISTRIBUTIONS UNDER, ANY PLAN OR PLANS OF REORGANIZATION OR LIQUIDATION IN THIS CASE.**

6. Proof of claim forms and a copy of the Bar Date Order may be obtained by visiting <https://www.veritaglobal.net/gwc>, maintained by the Debtor’s claims and noticing agent, Verita. Questions concerning the contents of this Notice and requests for copies of filed proofs of claim should be directed to Verita by visiting <https://www.veritaglobal.net/GWC/inquiry>. 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. Verita cannot advise you how to file, or whether you should file, a proof of claim.

<b>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.</b>
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