

**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 DEPARTMENT OF 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 (“CMS” and, collectively, with HHS and DOJ, 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 including February 14, 2025

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



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[Docket No. 112], and that DOJ has now further agreed to extend the Stipulation through and including February 28, 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 June 14, 2025 through and including June 30, 2025, and the date in paragraph 6(a) of the Stipulation from February 14, 2025 to February 28, 2025.

PLEASE TAKE FURTHER NOTICE that the Debtor and the DOJ have agreed to extend any deadline for the United States to file a proof of claim in the above-captioned bankruptcy case through and including June 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 during the term of the Stipulation, including any extensions thereof, regarding the rebuttal letter to CMS dated October 11, 2024.

PLEASE TAKE FURTHER NOTICE that, except as provided herein, all terms set forth in the Stipulation and any prior Notices extending the Stipulation remain in full force and effect as if set forth in full in this Notice.

[Signature page to follow]

Dated: February 14, 2025

Respectfully submitted,

DENTONS US LLP

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Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on February 14, 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

Global Wound Care Medical Group and Wound Pros Management Group
2-Week Operating Budget
Period Ended February 28, 2025

WEEK ENDED	2/22/2025	2/28/2025	2 Week TOTAL
Biologics Product Expenses	\$ 11,945,682	\$ 3,054,318	\$ 15,000,000
Other Cost of good sold	1,156,209	73,776	1,229,985
Payroll Expense	3,886,571	551,050	4,437,621
Rent Expenses	55,760	28,519	84,279
Admin Expense	759,290	54,443	813,733
Insurance Expense	131,792	13,931	145,722
Services Cost	2,244,008	800,586	3,044,595
Software Expense	249,089	88,761	337,850
Travel Expenses	286,504	134,424	420,928
Marketing and Sales Expenses	183,258	101,485	284,743
Total Operating Expenses	\$ 20,898,163	\$ 4,901,293	\$ 25,799,456