

**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

Re: Docket No. 120

**CERTIFICATE OF NO OBJECTION FOR DEBTOR’S MOTION FOR ENTRY OF AN
ORDER EXTENDING ITS EXCLUSIVE PERIOD FOR THE FILING OF A CHAPTER 11
PLAN PURSUANT TO § 1121(D) OF THE BANKRUPTCY CODE**

1. On February 18, 2025, 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 Motion for Entry of an Order Extending Its Exclusive Period for the Filing of a Chapter 11 Plan Pursuant to § 1121(D) of the Bankruptcy Code* [Docket No. 120] (the “Motion”). Objections to the Motion were required to be filed and served on or prior to March 11, 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) 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.

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.

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



Dated: March 17, 2025

Respectfully submitted,

/s/ Casey W. Doherty, Jr.

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Counsel to the Debtor and Debtor in Possession

CERTIFICATE OF SERVICE

This is to certify that I have on March 17, 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,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908

**ORDER GRANTING DEBTOR'S MOTION FOR ENTRY OF AN ORDER EXTENDING ITS
EXCLUSIVE PERIOD FOR THE FILING OF A CHAPTER 11 PLAN
PURSUANT TO § 1121(D) OF THE BANKRUPTCY CODE**

Upon consideration of the Motion² 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 § 1121(d) of title 11 of the United States Code, §§ 101 *et seq.* (the "Bankruptcy Code"),³ for entry of an order (a) extending the periods during which the Debtor has the exclusive right to (i) file a chapter 11 plan (the "Exclusive Filing Period"), and (ii) solicit acceptances thereof (the "Exclusive Solicitation Period" and, together with the Exclusive Filing Period, the "Exclusive Periods"), in each case, by 120 days, from February 18, 2025 and April 21, 2025 to June 18, 2025 and August 19, 2025, respectively, without prejudice to the Debtor's rights to request further extensions of such periods in accordance with §1121(d), and (b) granting the Debtor such other and further relief as is just; and upon the record in this Case; and this Court having jurisdiction over this matter pursuant to 28 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

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

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

³ All references to "§" or "section" herein are to sections of the Bankruptcy Code.

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. The Motion is granted in full.
2. Pursuant to § 1121(d), the Debtor's Exclusive Filing Period in which to file a chapter 11 plan is extended from February 18, 2025 to and including June 18, 2025.
3. Pursuant to § 1121(d), the Debtor's Exclusive Solicitation Period in which to solicit acceptances of its chapter 11 plan is extended from April 21, 2025 to and including August 19, 2025.
4. The extensions of the Exclusive Periods granted herein are without prejudice to the Debtor's rights to seek from this Court further extensions of time pursuant to § 1121(d).
5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
6. The Debtor is authorized to take all steps necessary or appropriate to carry out the relief granted in this Order.
7. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025

Christopher M. Lopez
United States Bankruptcy Judge