

**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 (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 Department of 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 March 21, 2025

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



[Docket No. 141], and that DOJ has now further agreed to extend the Stipulation through and including March 31, 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 July 21, 2025, through and including July 31, 2025, and the date in paragraph 6(a) of the Stipulation from March 21, 2025, through and including March 31, 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: March 21, 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 March 21, 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**  
**March Operating Budget**  
**Period Ended March 31, 2025**

	<b>Week Ended</b>	<b>2-Days Ended</b>	<b>TOTAL</b>
	<b>3/29/2025</b>	<b>3/31/2025</b>	
Biologics Product Expenses	\$ 17,280,707	\$ 493,200	\$ 17,773,907
Other Cost of good sold	655,263	258,730	913,993
Payroll Expense	764,138	7,789	771,927
Rent Expenses	101,808	44,221	146,029
Admin Expense	372,414	72,081	444,495
Insurance Expense	13,931	2,786	16,717
Services Cost	1,356,716	42,610	1,399,326
Software Expense	533,153	89,779	622,932
Travel Expenses	149,424	26,885	176,309
Marketing and Sales Expenses	47,485	9,497	56,982
<b>Total Operating Expenses</b>	<b>\$ 21,275,039</b>	<b>\$ 1,047,578</b>	<b>\$ 22,322,616</b>