

**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 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 April 7, 2025 [Docket

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



No. 154], and that DOJ has now further agreed to extend the Stipulation through and including April 14, 2025.

PLEASE TAKE FURTHER NOTICE that the Debtor and the DOJ have agreed to extend the date in paragraph 5(d) of the Stipulation from August 7, 2025, through and including August 14, 2025, and the date in paragraph 6(a) of the Stipulation from April 7, 2025, through and including April 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: April 7, 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 April 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.

EXHIBIT A

Global Wound Care Medical Group and Wound Pros Management Group
April Operating Budget
Period Ended April 14, 2025

	5-Days Ended 4/12/2025	2-Days Ended 4/14/2025	TOTAL
Biologics Product Expenses	\$ 16,850,190	\$ 567,000	\$ 17,417,190
Other Cost of good sold	776,798	45,000	821,798
Payroll Expense	638,563	111,935	750,498
Rent Expenses	37,158	7,636	44,794
Admin Expense	391,966	18,454	410,421
Insurance Expense	788,931	362,786	1,151,717
Services Cost	799,969	506,229	1,306,198
Software Expense	196,899	15,146	212,045
Travel Expenses	461,309	16,131	477,440
Marketing and Sales Expenses	610,985	9,497	620,482
Total Operating Expenses	\$ 21,552,767	\$ 1,659,814	\$ 23,212,582