

ENTERED

April 29, 2025

Nathan Ochsner, Clerk

**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.

Chapter 11

Case No. 24-34908 (CML)

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.

Defendant.

Adv. Pro. No. 25-03121 (CML)

**STIPULATION AND ORDER EXTENDING OBJECTION DEADLINE REGARDING
MOTION FOR STAY RELIEF AND EMERGENCY MOTION**

This Stipulation and Order (the "Stipulation and Order") is entered into by and among Global Wound Care Medical Group, a Professional Corporation (the "Debtor") and Wells Fargo Bank, N.A. ("Wells Fargo" and, together with the Debtor, the "Parties"). The Parties hereby stipulate and agree as follows:

RECITALS

A. On October 21, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code² initiating the above-captioned main bankruptcy case (Case No. 24-34908) (the "Bankruptcy Case") in the United States Bankruptcy Court for the

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

² Title 11 of the U.S. Code.



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Southern District of Texas (the "Court"). The Debtor remains in possession of its assets and continues to operate its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

B. On April 4, 2025, Wells Fargo filed its *Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) to Close the Debtor's Bank Account* [Main Case, Docket No. 157] (the "Motion for Stay Relief").

C. On April 4, 2025, the Debtor filed the *Debtor's Emergency Motion for Preliminary Injunction and Temporary Restraining Order* [Adv. Pro. Dkt. No. 2] (the "Emergency Motion," and together with the Motion for Stay Relief, the "Motions").

D. The objection deadline on the Motions is April 25, 2025 (the "Objection Deadline").

E. Since the Motions were filed, the Parties have been working consensually to resolve the Motions and accordingly, the Parties have agreed to enter into and jointly submit this Stipulation.

IT IS HEREBY STIPULATED AND AGREED, AND UPON COURT APPROVAL HEREOF, IT IS HEREBY ORDERED:

1. The above recitals are incorporated by reference into this Agreed Order with the same force and effect as if fully set forth hereinafter.

2. The terms of this Stipulation and Order are approved and **GRANTED** in their entirety as set forth above and below and shall become effective and binding immediately upon entry by the Court.

3. The Objection Deadline on the Motions is hereby extended to **April 30, 2025** (the "Extended Objection Deadline"); *provided* that such deadline may be further extended by written agreement of the Parties upon approval of the Court.

4. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation and Order to present any copies, electronic copies, or facsimiles signed by the Parties here to be charged.


5. Each undersigned counsel represents that they are authorized to execute and bind their respective clients to the terms of this Stipulation and Order.

6. This Stipulation and Order shall not be modified, alternated, amended, or vacated without the written consent of all Parties hereto or by further order of the Court.

7. The Court shall retain sole and exclusive jurisdiction over all matters related to this Stipulation and Order.

8. This Stipulation and Order is a Final Order within the meaning of 28 U.S.C. § 158(a)(1) and is effective immediately upon entry.

Signed: April 29, 2025



Christopher Lopez
United States Bankruptcy Judge

Stipulated and agreed to by:

Dated: April 25, 2025
New York, New York

Dated: April 25, 2025
Houston, Texas

GLOBAL WOUND CARE MEDICAL,
a Professional Corporation.

WELLS FARGO BANK, N.A.

By:

By:

/s/ Kyle J. Ortiz*

Kyle J. Ortiz (admitted *pro hac vice*)
Jared C. Borriello (admitted *pro hac vice*)
TOGUT, SEGAL & SEGAL LLP
One Penn Plaza, Suite 3335
New York, New York 10119
Telephone: (212) 594-5000
Facsimile: (212) 967-4258

Conflicts Counsel to the Debtor

/s/ Sean B. Davis

Sean B. Davis
Texas Bar No. 24069583
S.D. Tex. No. 1048341
WINSTEAD PC
600 Travis Street, Suite 5200
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400

Counsel to Wells Fargo Bank, N.A.

*Signed by permission, Sean B. Davis

United States Bankruptcy Court
Southern District of Texas

In re:
Global Wound Care Medical Group, a Profe
Debtor

Case No. 24-34908-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Apr 29, 2025

User: ADIuser
Form ID: pdf002

Page 1 of 2
Total Noticed: 3

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 01, 2025:

Recip ID	Recipient Name and Address
db	+ Global Wound Care Medical Group, a Professional Co, 5901 West Century Boulevard, Suite 750, Los Angeles, CA 90045-5443
cr	UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JU, PO BOX 875, WASHINGTON, DC 20044-0875

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
op	+ Email/Text: kccnoticing@kccllc.com	Apr 29 2025 20:35:00	Kurtzman Carson Consultants, LLC dba Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, UNITED STATES 90245-5614

TOTAL: 1

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Dentons US LLP
intp		Wells Fargo Bank, N.A.

TOTAL: 2 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 01, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 29, 2025 at the address(es) listed below:

Name	Email Address
Andrew Douglas Warner	on behalf of Creditor UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JUSTICE andrew.warner@usdoj.gov

District/off: 0541-4
Date Rcvd: Apr 29, 2025

User: ADIuser
Form ID: pdf002

Page 2 of 2
Total Noticed: 3

Augustus Curtis	on behalf of Creditor UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JUSTICE augustus.t.curtis@usdoj.gov
Casey William Doherty, Jr	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation casey.doherty@dentons.com, robert.hammeke@dentons.com;Docket.General.Lit.Dal@dentons.com;Tabitha.peterson@dentons.com
Christopher Ross Travis	on behalf of U.S. Trustee US Trustee C.Ross.Travis@usdoj.gov
Evan Gershbein	on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
Ha Minh Nguyen	on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov
Jared C Borriello	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation jborriello@teamtogut.com
Kyle Ortiz	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation kortiz@teamtogut.com, dperson@teamtogut.com;arivera@teamtogut.com;acarlin@teamtogut.com;jcohen@teamtogut.com
Kyle Ortiz	on behalf of Plaintiff Global Wound Care Medical Group a Professional Corporation kortiz@teamtogut.com, dperson@teamtogut.com;arivera@teamtogut.com;acarlin@teamtogut.com;jcohen@teamtogut.com
Sean B Davis	on behalf of Defendant Wells Fargo Bank N.A. sbdavis@winstead.com, mmingo@winstead.com
Sean B Davis	on behalf of Interested Party Wells Fargo Bank N.A. sbdavis@winstead.com, mmingo@winstead.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 12