

**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 July 12, 2025 [Docket

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



24349082507110000000000001

No. 213], and that DOJ has now further agreed to extend the Stipulation through and including August 9, 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 November 13, 2025, through and including December 11, 2025, and the date in paragraph 6(a) of the Stipulation from July 12, 2025, through and including August 9, 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 December 12, 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: July 11, 2025

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.
Casey W. Doherty Jr.
1300 Post Oak Blvd.
Suite 650
Houston, TX 77056
Phone: (713) 658-4600
Email: casey.doherty@dentons.com

Samuel R. Maizel (admitted *pro hac vice*)
Tania M. Moyron (admitted *pro hac vice*)
601 S. Figueroa Street
Suite 2500
Los Angeles, CA 90017
Telephone: (213) 892-2910
Email: samuel.maizel@dentons.com
Email: tania.moyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

/s/ Andrew Warner (signed
by permission)
KIRK T. MANHARDT
MARY A. SCHMERGEL
ANDREW WARNER
Commercial Litigation Branch
Civil Division
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington D.C. 20044
Tel. (202) 598-7524
Email: Andrew.Warner@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on July 11, 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
July/August Operating Budget
Period Ended August 09, 2025

	Week Ended 7/19/2025	Week Ended 7/26/2025	Week Ended 8/2/2025	Week Ended 8/9/2025	TOTAL
Biologics Product Expenses	\$ 17,331,464	\$ 5,126,594	\$ 4,503,057	\$ 4,746,916	\$ 31,708,030
Other Cost of good sold	430,810	219,000	219,000	434,000	1,302,810
Payroll Expense	1,250,388	3,154,974	661,215	2,720,161	7,786,738
Rent Expenses	26,643	81,283	25,422	1,919	135,267
Admin Expense	236,127	221,140	208,060	233,763	899,089
Insurance Expense	13,931	13,931	13,931	13,931	55,722
Services Cost	1,400,448	791,904	409,024	303,391	2,904,767
Software Expense	632,354	219,618	151,461	113,595	1,117,028
Travel Expenses	134,424	134,424	134,424	134,424	537,696
Marketing and Sales Expenses	47,485	47,485	47,485	47,485	189,940
Total Operating Expenses	\$ 21,504,072	\$ 10,010,352	\$ 6,373,077	\$ 8,749,585	\$ 46,637,087