

**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 August 9, 2025 [Docket

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



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No. 228], and that DOJ has now further agreed to extend the Stipulation through and including September 6, 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 December 9, 2025, through and including January 8, 2026, and the date in paragraph 6(a) of the Stipulation from August 9, 2025, through and including September 6, 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: August 8, 2025

Respectfully submitted,

**DENTONS US LLP**

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**CERTIFICATE OF SERVICE**

This is to certify that I have on August 8, 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**  
**August/September Operating Budget**  
**Period Ended September 06, 2025**

	<b>Week Ended 8/16/2025</b>	<b>Week Ended 8/23/2025</b>	<b>Week Ended 8/30/2025</b>	<b>Week Ended 9/6/2025</b>	<b>TOTAL</b>
Biologics Product Expenses	\$ 17,126,166	\$ 4,682,072	\$ 2,512,962	\$ 2,907,610	\$ 27,228,810
Other Cost of good sold	430,810	341,029	219,000	219,000	1,209,839
Payroll Expense	1,210,366	2,755,135	661,215	2,596,672	7,223,388
Rent Expenses	26,643	6,117	100,166	2,341	135,267
Admin Expense	236,127	221,140	233,763	208,060	899,089
Insurance Expense	13,931	13,931	13,931	13,931	55,722
Services Cost	654,318	841,100	607,201	427,371	2,529,989
Software Expense	822,887	219,618	151,461	113,595	1,307,561
Travel Expenses	134,424	184,424	134,424	134,424	587,696
Marketing and Sales Expenses	47,485	47,485	47,485	510,985	653,440
<b>Total Operating Expenses</b>	<b>\$ 20,703,155</b>	<b>\$ 9,312,050</b>	<b>\$ 4,681,607</b>	<b>\$ 7,133,989</b>	<b>\$ 41,830,800</b>