

**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 October 4, 2025

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



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[Docket No. 255], and that DOJ has now further agreed to extend the Stipulation through and including November 1, 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 February 5, 2026, through and including March 5, 2026, and the date in paragraph 6(a) of the Stipulation from October 4, 2025, through and including November 1, 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 March 13, 2026.

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: October 1, 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 October 1, 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
October/November Operating Budget
Period Ended November 01, 2025

	Week Ended 10/11/2025	Week Ended 10/18/2025	Week Ended 10/25/2025	Week Ended 11/1/2025	TOTAL
Biologics Product Expenses	\$ 16,144,665	\$ 3,161,626	\$ 3,886,170	\$ 3,777,196	\$ 26,969,657
Other Cost of good sold	1,440,815	219,000	219,000	219,000	2,097,815
Payroll Expense	1,278,885	2,691,355	720,256	2,532,892	7,223,388
Rent Expenses	26,919	1,643	104,830	17,341	150,733
Admin Expense	311,127	221,140	233,763	208,060	974,089
Insurance Expense	53,931	13,931	13,931	13,931	95,722
Services Cost	1,043,720	601,717	709,656	427,310	2,782,403
Software Expense	374,781	219,618	151,461	113,595	859,455
Travel Expenses	234,424	134,424	134,424	134,424	637,696
Marketing and Sales Expenses	47,485	47,485	47,485	47,485	189,940
Total Operating Expenses	\$ 20,956,752	\$ 7,311,938	\$ 6,220,975	\$ 7,491,234	\$ 41,980,899