Docket #0399 Date Filed: 03/09/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
GLOBAL WOUND CARE MEDICAL GROUP, a Professional Corporation,[1]	Case No. 24-34908 (CML)
	Re: Docket No. 388
Debtor and Debtor in Possession.	

CERTIFICATE OF COUNSEL WITH RESPECT TO THE DEBTOR'S MOTION FOR ENTRY OF ORDER AUTHORIZING DEBTOR TO: (1) DISPOSE OF PATIENT RECORDS IN ACCORDANCE WITH 11 U.S.C. § 351; AND (2) OBTAIN RELATED RELIEF

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession in the above-captioned case (the "Debtor") certifies as follows:

1. On February 13, 2026, the Debtor filed the *Motion for Entry of Order Authorizing Debtor to: (1) Dispose of Patient Records in Accordance with 11 U.S.C. § 351; and (2) Obtain Related Relief* [Docket No. 388] (the "Motion"). Attached as Exhibit A to the Motion was a proposed order (the "Proposed Order").

2. The deadline to object to the Motion was March 6, 2026 (the "Objection Deadline"). No objections to the Motion were filed on the docket on or before the Objection Deadline. Additionally, counsel for the Debtor did not receive any informal comments or objections to the Motion other than as discussed in paragraph 3 below.

[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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3. Counsel to 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 and its designated component, the Centers for Medicare and Medicaid Services, provided comments in response to the Motion. The DOJ and the Debtor have conferred and agreed to the entry of a revised Proposed Order (the "Revised Order") attached hereto as **Exhibit A**. A redline reflecting the changes between the Proposed Order and the Revised Order is attached hereto as **Exhibit B**.

4. Accordingly, the Debtor requests that the Court enter the Revised Order.

Dated: March 9, 2026

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.

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Counsel to the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

This is to certify that I have on March 9, 2026, 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

Revised Order

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)

ORDER AUTHORIZING DEBTOR TO: (1) DISPOSE OF PATIENT RECORDS IN ACCORDANCE WITH 11 U.S.C. § 351; AND (2) OBTAIN RELATED RELIEF

Upon the motion [Docket No. 620] (the "Motion")[2] of the above-captioned debtor and debtor in possession (the "Debtor"), pursuant to §§ 105 and 351 of title 11 of the United States Code (the "Bankruptcy Code")[3] and Bankruptcy Rule 6011, for entry of an order (i) authorizing the Debtor to dispose of patient records in accordance with the Patient Records Disposal Procedures, and (ii) granting other related relief; and this Court being fully advised on the Motion; it appearing that proper notice of the Motion had been provided; and it appearing that good and sufficient cause having been shown; based upon the arguments, testimony, and evidence presented to the Court, and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED:

1. The Motion is **GRANTED**.

2. All objections to the relief sought in the Motion that have not been previously

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

[2] All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

[3] All references to § herein are to sections of the Bankruptcy Code. All references to "Bankruptcy Rules" are to provisions of the Federal Rules of Bankruptcy Procedure. All references to "LBR" are to provisions of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas.

resolved or withdrawn are hereby overruled on their merits and with prejudice.

3. The Debtor (or any successor thereto including any chapter 7 trustee) is authorized, pursuant to 11 U.S.C. §§ 105 and 351, to comply with all requirements of 11 U.S.C. § 351 and Bankruptcy Rule 6011 with respect to the disposal of records in accordance with the Patient Records Disposal Procedures identified in the Motion and in Exhibit B thereto, including:

i. Publication of notice of the proposed disposal of patient records in newspapers of general circulation, to include *The Los Angeles Times*; *USA Today*; and *The Houston Chronicle* (*i.e.*, the Published Notice, a copy of which is attached as Exhibit D to the Motion);

ii. Prompt notification of all patients to whom the Debtor provided care within the last twelve (12) months whose patient records may be at issue, applicable insurance carriers, and the Attorneys General for any states where the Debtor operated, within 180 days of the Published Notice regarding the claiming and disposing of the relevant records, consistent with § 351(1)(B);

iii. Notification of DHHS and the Deputy Assistant Attorney General for Commercial Litigation Branch of the Civil Division of the United States Department of Justice ("DOJ") to request permission to deposit any patient records with DHHS or DOJ, to the extent such patient records have not been claimed during the Waiting Period by patients or the appropriate insurance carrier; and

iv. Destruction of the records in the manner specified in § 351(3) if the records have not been retrieved during the Waiting Period, unless DHHS or DOJ has notified the Debtor of its intent to accept deposit of such records.

4. Nothing in this Order shall be construed as affecting the Debtor's obligation, if any, to produce records to the United States, including, but not limited to, any documents that are responsive to a federal investigation, litigation discovery request, or demand for documentation supporting Medicare or other federal healthcare program claims prior to destruction of the records pursuant to § 351(3).

Dated: _____, 2026

Judge Christopher M. Lopez
United States Bankruptcy Judge

Exhibit B

Redline of Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	Chapter 11
GLOBAL WOUND CARE MEDICAL GROUP, a Professional Corporation,[1]	Case No. 24-34908 (CML)

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Upon the motion [Docket No. 620] (the "Motion")[2] of the above-captioned debtor and debtor in possession (the "Debtor"), pursuant to §§ 105 and 351 of title 11 of the United States Code (the "Bankruptcy Code")[3] and Bankruptcy Rule 6011, for entry of an order (i) authorizing the Debtor to dispose of patient records in accordance with the Patient Records Disposal Procedures, ~~pursuant to § 351,~~ and (ii) granting other related relief~~, pursuant to § 105~~; and this Court being fully advised ~~in~~on the ~~premises~~Motion; it appearing that proper notice of the Motion had been provided; and it appearing that good and sufficient cause having been shown; based upon the arguments, testimony, and evidence presented to the Court, and after due deliberation and sufficient cause appearing therefore,

IT IS HEREBY ORDERED:

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

[2] All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

[3] All references to § herein are to sections of the Bankruptcy Code. All references to "Bankruptcy Rules" are to provisions of the Federal Rules of Bankruptcy Procedure. All references to "LBR" are to provisions of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of Texas.

1. The Motion is **GRANTED** ~~as set forth herein~~.

2. All objections to the relief sought in the Motion that have not been previously resolved or withdrawn are hereby overruled on their merits and with prejudice.

3. The Debtor (or any successor thereto including any chapter 7 trustee) is authorized, pursuant to 11 U.S.C. §§ 105 and 351, to comply with all requirements of 11 U.S.C. § 351 and Bankruptcy Rule 6011 with respect to the disposal of records in accordance with the Patient Records Disposal Procedures identified in the Motion and in Exhibit B thereto, including:

i. Publication of notice of the proposed disposal of patient records in newspapers of general circulation, to include *The Los Angeles Times*; *USA Today*; and *The Houston Chronicle* (*i.e.*, the Published Notice, a copy of which is attached as Exhibit D to the Motion);

ii. Prompt notification of all patients to whom the Debtor provided care within the last twelve (12) months whose patient records may be at issue, applicable insurance carriers, and the Attorneys General for any states where the Debtor operated, within 180 days of the Published Notice regarding the claiming and disposing of the relevant records, consistent with § 351(1)(B);

iii. Notification of DHHS and the Deputy Assistant Attorney General for Commercial Litigation Branch of the Civil Division of the United States Department of Justice ("DOJ") to request permission to deposit any patient records with DHHS or DOJ, to the extent such patient records have not been claimed during the Waiting Period by patients or the appropriate insurance carrier; and

iv. Destruction of the records in the manner specified in § 351(3) if the records have not been retrieved during the Waiting Period, unless DHHS or DOJ has notified the Debtor of its intent to accept deposit of such records.

4. Nothing in this Order shall be construed as affecting the Debtor's obligation, if any, to produce records to the United States, including, but not limited to, any documents that are responsive to a federal investigation, litigation discovery request, or demand for documentation supporting Medicare or other federal healthcare program claims prior to destruction of the records pursuant to § 351(3).

Dated: _____, 2026

_____
Judge Christopher M. Lopez
United States Bankruptcy Judge

Summary report: **Litera Compare for Word 11.4.0.111 Document comparison done on 3/9/2026 9:05:21 PM**	
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Table Insert	0
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Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	14