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)
Debtor and Debtor in Possession.	

NOTICE OF 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

PLEASE TAKE NOTICE THAT the Debtor filed a *Motion for Entry of Order Authorizing Debtor to: (1) Dispose Patient Records in Accordance with 11 U.S.C. § 351; and (2) Obtain Related Relief* [Docket No. 388] (the "Motion"), which the Court granted on April 6, 2026 [Docket No. 409] (the "Order").[2]

PLEASE TAKE FURTHER NOTICE THAT pursuant to the Order, the Debtor is now implementing the Patient Records Disposal Procedures (as defined in the Motion) for patient records,[3] pursuant to §§ 105(a) and 351 of title 11 of the United States Code (the "Bankruptcy Code").[4] [5] Specifically, as part of the Patient Records Disposal Procedures, the Debtor is authorized to destroy all of its patient records on or as reasonably practicable after the date (the "Destruction Date") that is fourteen (14) days following the date that is 365 days (the "Waiting Period") from the date of publication of this notice (this "Published Notice"), to the extent that such patient records remain in the possession and/or control of the Debtor after the Waiting Period.

PLEASE TAKE FURTHER NOTICE THAT those with rights to the patient records who wish to retrieve such patient records must make arrangements with the Iron Mountain to retrieve them prior to close of the Waiting Period. Iron Mountain may be reached at: Iron Mountain Release of Information, 11333 E. 53rd Ave.; Denver, CO 80239; DenverROI@ironmountain.com; Phone: 303-373-5764; Fax: 303-576-6874.

[1] The last four digits of the Debtor's tax identification number in the jurisdiction in which it operated is 3572.
[2] A copy of the Motion and Order can be found at https://www.veritaglobal.net/gwc, the website established by the Debtor's claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a/ Verita Global for the Debtor's chapter 11 case.
[3] "Patient Records" are defined in the Bankruptcy Code (as defined herein) as "any record relating to a patient, including a written document or a record recorded in a magnetic, optical, or other form of electronic medium." 11 U.S.C. § 101(40B).
[4] All references to "§" or "section" 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.
[5] The Debtor understands its obligation to maintain any litigation holds for pending or anticipated litigation, and will retain and preserve any such records as required.