Docket #0447 Date Filed: 9/11/2026

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.	Chapter 11 Case No. 24-34908-CML

DEBTOR'S MOTION FOR ORDER AUTHORIZING THE FILING OF CERTAIN INFORMATION UNDER SEAL

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Global Wound Care Medical Group, a Professional Corporation (the "Debtor"), the debtor and debtor-in-possession in the above-captioned chapter 11[2] case (the "Chapter 11 Case"), files this motion (the "Motion") for entry of an order, pursuant to §§ 105(a) and 107(c), Bankruptcy Rule 9019, and the Local Rules, authorizing the Debtor to file under seal certain portions of (a)

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

[2] Unless specified otherwise, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"); "Bankruptcy Rule" references are to the Federal Rule of Bankruptcy Procedure. "Local Rules" references are to the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Texas.

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the concurrently filed *Debtor's Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 (I) Authorizing and Approving the Settlement Agreement with the United States; and (II) Granting Related Relief*, which appends the *Declaration of Louis E. Robichaux IV in Support of Debtor's Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 (I) Authorizing and Approving the Debtor's Settlement Agreement with the United States and Relator; and (II) Granting Related Relief* (the "Rule 9019 Motion"),[3] and (b) the Settlement Agreement with the United States attached as **Exhibit "B"** to the Rule 9019 Motion. The Debtor seeks to seal information in the Rule 9019 Motion as required by the False Claims Act, 31 U.S.C. § 3729 et seq. (the "FCA"), related to the identity of a third-party *qui tam* relator[4] (the "Relator") and relator's FCA complaint (the "FCA Complaint," and collectively with the information to be sealed, the "FCA Information").

In support of this Motion, the Debtor relies on the *Declaration of Louis E. Robichaux IV* (the "Robichaux Declaration"), and respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157(a) and 1334. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b)(2).

2. The statutory bases for the relief requested are §§ 105(a) and 107(c).

BACKGROUND

3. On October 21, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. Prior to the Petition Date, the Centers for

[3] Unless otherwise defined herein, all capitalized terms shall have the same meaning as in the Rule 9019 Motion.

[4] Under the FCA, a qui tam relator is a private citizen who files a lawsuit on behalf of the government against a person or company that has allegedly violated the False Claims Act, 31 U. S. C. § 3729 *et seq. See, e.g.*, *Vermont Agency of Natural Resources v. United States ex rel. Stevens*, 529 U. S. 765, 769 (2000).

Medicare & Medicaid Services ("CMS"), in consultation with Office of Inspector General, United States Department of Health and Human Services ("OIG-HHS"), suspended the Debtor's Medicare payments (the "Payment Suspension") based on "credible allegations of fraud." The facts and circumstances giving rise to this Chapter 11 Case, including the Payment Suspension, are set forth in detail in the *Declaration of Ralph Cetrulo in Support of Chapter 11 Petition and First Day Motions* [Docket No. 8].

4. The FCA Complaint is a *qui tam* action filed by Relator in the name of the United States alleging, among other things, that the Debtor submitted or caused the submission of false claims for payment to the government. The United States asserts a claim against the Debtor exceeding $1.5 billion related to allegations set forth in the FCA Complaint and uncovered in the course of the United States' investigation (the "FCA Allegations").

5. Under section 3730(b)(2) of the FCA, a relator files a *qui tam* complaint *in camera*, and the complaint remains under seal for at least 60 days. *See, e.g., State Farm Fire & Casualty Co. v. United States ex rel. Rigsby*, 580 U.S. 26, 33 (2016) ("Section 3730(b)(2)'s text provides that a complaint "shall" be kept under seal"). The initial seal may be extended for good cause under section 3730(b)(3).

6. The FCA Complaint and other filings remain under seal pursuant to orders of the court in which it was filed and which retains jurisdiction over that action (the "FCA District Court"). The FCA District Court has granted partial lifts of the seal allowing specific information to be disclosed, including to allow the United States to disclose certain information to the Debtor and to this Court, and for Relator to disclose sufficient information to file a proof of claim in this Court. However, pursuant to the FCA District Court's orders, the FCA Complaint otherwise remains under seal.

7. Counsel for the Debtor and attorneys from the United States Department of Justice ("Government Counsel"), representing CMS and OIG-HHS, have negotiated a settlement of the FCA Allegations. The Settlement Agreement also addresses certain claims of the Relator who filed the *qui tam* complaint in the FCA Litigation that remains under seal. The FCA Complaint also includes claims and defendants not addressed in the Settlement Agreement.

8. The Settlement Agreement contains information about the Relator's identity and certain details about the FCA Complaint that are protected from disclosure by the FCA District Court's sealing orders. The Government Counsel have therefore requested that the Debtor seek to seal the FCA Information.

9. Concurrently with this Motion, the Debtor has filed the Rule 9019 Motion (with redactions of the FCA Information) that seeks approval of the Settlement Agreement. The context, terms, and significance of the Settlement Agreement are described in full in the Rule 9019 Motion, which is incorporated herein by reference.

RELIEF REQUESTED

10. By this Motion, the Debtor requests authority to file under seal the FCA Information contained in the Rule 9019 Motion and Settlement Agreement.

BASIS FOR RELIEF

11. Sealing the complaint and other papers in an FCA action is crucial to protect the government's investigation from interference and to safeguard certain sensitive information from public scrutiny during the initial phase of the investigation. "The primary purpose of the [FCA's] seal provision is to protect the government's interests." *United States ex rel. STF, LLC v. True Health Diagnostics, LLC*, No. 4:16-cv-547, 2025 WL 1550098, at *2 (E.D. Tex., May 30, 2025); *see also State Farm Fire & Cas. Co. v. United States ex rel. Rigsby*, 580 U.S. 26, 34-35 (2016) ("[T]he seal requirement was intended in main to protect the Government's interests.").

12. Here, the FCA Complaint remains under seal. The Debtor cannot publicly disclose the FCA Information contained in the Settlement Agreement without violating the FCA District Court's orders maintaining the seal.

13. Additionally, Government Counsel have requested the Debtor file the FCA Information under seal to protect its ongoing investigation of defendants and claims not resolved as part of the instant settlement agreement.

14. This is a reasonable and limited request. The primary impact of the Settlement Agreement concerns the Debtor's resolution of the United States' approximately $1.5 billion claim and going-forward obligations of the parties. This information is fully disclosed in the unredacted versions of the Rule 9019 Motion and the Settlement Agreement. The redactions affect only the limited portions related to the FCA Litigation and the Relator.

CONCLUSION

15. The Debtor respectfully requests that this Court: (i) grant the Motion; (ii) authorize the Debtor to file unredacted versions of the Rule 9019 Motion, the Robichaux Declaration, and the Settlement Agreement under seal; (iii) enter an order substantially in the form filed herewith; and (iv) grant such other and further relief as the Court deems just and appropriate.

Dated: September 11, 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 on September 11, 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.
Casey W. Doherty Jr.

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

In re: GLOBAL WOUND CARE MEDICAL GROUP, a Professional Corporation,[5] Debtor.	Chapter 11 Case No. 24-34908-CML

DECLARATION OF LOUIS E. ROBICHAUX IV IN SUPPORT OF THE DEBTOR'S MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE FILING OF CERTAIN INFORMATION UNDER SEAL

I, Louis E. Robichaux IV, being duly sworn, state the following under penalty of perjury:

1. I am a Senior Managing Director with Ankura Consulting Group, LLC ("Ankura"), a management consulting firm that provides expert services to businesses in various professional areas including bankruptcy and corporate restructuring.

2. In the above-captioned case (the "Case"), I am the Chief Restructuring Officer ("CRO") of Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the "Debtor"). I submit this declaration (this "Declaration") in support of the contemporaneously filed *Debtor's Motion for Entry of an Order Authorizing the Filing of Certain Information Under Seal* (the "Motion")[6]. All of the factual assertions in this Declaration are true and correct to the best of my knowledge.

3. Concurrently with the Motion, the Debtor has filed the Rule 9019 Motion (with redactions of the Relator Information) that seeks approval of the Settlement Agreement. Pursuant

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

[6] Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

to the Settlement Agreement, the Debtor will resolve claims asserted by the United States in excess of $1.5 billion.

4. The Settlement Agreement also addresses claims of a third party *qui tam* relator (the "Relator") who filed a related False Claims Act complaint that remains under seal (the "FCA Complaint").

5. The United States requested that the Debtor seek to seal the certain references to the FCA Complaint in seeking approval of the Settlement Agreement.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: September 11, 2026

/s/ Louis E. Robichaux IV
Louis E. Robichaux IV
Senior Managing Director
Ankura Consulting Group, LLC

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

In re: GLOBAL WOUND CARE MEDICAL GROUP, Debtor.	Chapter 11 Case No. 24-34908-CML

ORDER GRANTING DEBTOR'S MOTION FOR ORDER AUTHORIZING THE FILING OF CERTAIN DOCUMENTS UNDER SEAL

Upon the motion (the "Motion")[7] of the above-captioned debtor and debtor in possession (the "Debtor") for entry of an order allowing the Debtor to file under seal certain portions of (a) the *Debtor's Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 (I) Authorizing and Approving the Settlement Agreement with the United States; and (II) Granting Related Relief* (the "Rule 9019 Motion") and (b) the Settlement Agreement attached to the Rule 9019 Motion, as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion protects the identity of a third party *qui tam* relator (the "Relator") and the existence of a related sealed FCA complaint (the "FCA Complaint"), the confidentiality of which is protected under federal law, and is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other

[7] Capitalized terms used herein but not otherwise defined shall have the meanings given to them in the Motion.

notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. Pursuant to §§ 105(a) and 107(c) of the Bankruptcy Code, the Debtor shall be permitted to file unredacted versions of the Rule 9019 Motion, including the Declaration and the Settlement Agreement under seal.

2. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order.

3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2026

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UNITED STATES BANKRUPTCY JUDGE