Docket #0451 Date Filed: 09/14/2026

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)
Debtor and Debtor in Possession.	

STIPULATION AND ORDER EXTENDING THE PROOF OF CLAIM DEADLINE FOR THE UNITED STATES

This Stipulation and Order (the "Stipulation and Order") is entered into by and among 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," together with the Debtor, the "Parties"), on the other hand. The Parties hereby stipulate and agree as follows:

RECITALS

A. On October 21, 2024 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code, §§ 101 et seq. (the "Bankruptcy Code"), initiating the above-captioned bankruptcy case (the "Bankruptcy Case") in the United States Bankruptcy Court for the Southern District of Texas (the "Court"). The Debtor remains in

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

possession of its assets and continues to operate its business as a debtor-in-possession pursuant to §§ 1107 and 1108.[2]

B. On October 31, 2025, the Debtor and the DOJ agreed to extend any deadline for the United States to file a proof of claim in the Bankruptcy Case through and including March 27, 2026 (the "United States Proof of Claim Deadline"). Docket No. 323. On March 9, 2026, the Court entered an order further extending the United States Proof of Claim Deadline to August 1, 2026. Docket No. 397. The Parties further agreed to and Court further approved the extension the United States Proof of Claim Deadline to September 15, 2026. Docket No. 433.

C. The Parties have been working consensually to resolve certain issues between themselves and have agreed to enter into and jointly submit this Stipulation to further extend the United States Proof of Claim Deadline. On September 11, 2026, the Debtor filed the *Motion for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9019 (I) Authorizing and Approving the Settlement Agreement with the United States and Relator and (II) Granting Related Relief* [Docket 450] seeking approval of a settlement between the Parties.

IT IS HEREBY STIPULATED AND AGREED, AND UPON COURT APPROVAL HEREOF, IT IS HEREBY ORDERED:

1. The above recitals are incorporated by reference into this Stipulation and Order with the same force and effect as if fully set forth hereinafter.

2. The terms of this Stipulation and Order are approved and GRANTED in their entirety as set forth above and below and shall become effective and binding immediately upon entry by the Court.

[2] All references to "§" or "section" herein are to sections of the Bankruptcy Code.

3. The United States Proof of Claim Deadline is hereby extended to October 15, 2026, provided that such deadline may be further extended by written agreement of the Parties upon approval of the Court.

4. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument, and it shall constitute sufficient proof of this Stipulation and Order to present any copies, electronic copies, or facsimiles signed by the Parties here to be charged.

5. Each undersigned counsel represents that they are authorized to execute and bind their respective clients to the terms of this Stipulation and Order.

6. This Stipulation and Order shall not be modified, alternated, amended, or vacated without the written consent of all Parties hereto or by further order of the Court.

7. The Court shall retain sole and exclusive jurisdiction over all matters related to this Stipulation and Order.

8. This Stipulation and Order is a Final Order within the meaning of 28 U.S.C. § 158(a)(1) and is effective immediately upon entry.

Dated: _____, 2026

Judge Christopher M. Lopez
United States Bankruptcy Judge

Stipulated and agreed to by:

Dated: September 14, 2026

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CERTIFICATE OF SERVICE

This is to certify that I have on September 14, 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.