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,	)	Case No. 24-34908 (CML)
Debtor and Debtor in Possession.	)	

DEBTOR'S MOTION TO EXTEND DEADLINES TO FILE ESTATE CLAIMS AND AVOIDANCE ACTIONS PURSUANT TO 11 U.S.C. §§ 108(a), 546(a), AND 549(d) AND BANKRUPTCY RULE 9006(b)

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession (the "Debtor") in the above-captioned chapter 11[1] case (the "Case"), files this motion (the "Motion") pursuant to §§ 105(a), 108(a), 546(a), and 549(d), and Bankruptcy Rule 9006(b) seeking entry of an order, substantially in the form attached hereto as **Exhibit "A"** (the "Proposed Order"), to enlarge by 90 days—from October 21, 2026, to and including January 19, 2027—the time to commence any and all claims and causes of action of the estate, including those arising under chapter 5 (collectively, the "Estate Claims" and, to the extent arising under §§ 544, 545, 547, 548, 549, or 553, the "Avoidance Actions"), and to extend the deadlines under § 549(d) for

[1] Unless specified otherwise, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101–1532, and all "Bankruptcy Rule" references are to the Federal Rules of Bankruptcy Procedure.

Avoidance Actions relating to postpetition transfers as set forth in the Proposed Order. In support of the Motion, the Debtor respectfully states as follows:

PRELIMINARY STATEMENT

1. The Debtor seeks an extension of the current October 21, 2026 deadline to file Estate Claims and Avoidance Actions to allow it to resolve issues related to its pending settlement of a more than $1.5 billion claim with the United States and focus on preparing, filing, and soliciting a chapter 11 plan in this Case (the "Plan"). The Debtor is currently negotiating the Plan (due to be filed by November 6, 2026) and working to resolve issues with its two most significant stakeholders: (1) the United States Department of Justice, on behalf of itself and other federal agencies (collectively, the "United States"), which asserts claims against the Debtor exceeding $1.5 billion and is party to the Settlement Agreement (as defined below) that is the subject of the Debtor's pending 9019 Motion (as defined below) [Docket No. 450], and (2) Wound Pros Management Group, Inc. ("Wound Pros"), the Debtor's former manager and second-largest creditor, which has objected to the 9019 Motion. The requested extension will allow the Debtor time to resolve issues related to the Settlement Agreement and pursue confirmation of its Plan.

RELIEF REQUESTED

2. The Debtor requests entry of the Proposed Order extending the deadline to commence Estate Claims and Avoidance Actions (a) by 90 days, from October 21, 2026, to and including January 19, 2027, to the extent governed by §§ 108(a) and 546(a), and (b) for Avoidance Actions governed by § 549(d) relating to postpetition transfers, to the later of January 19, 2027, and the date that is 90 days after the deadline otherwise applicable to each such transfer.

JURISDICTION AND VENUE

3. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

5. The Debtor operated a medical practice providing wound care services, primarily to elderly Medicare patients, through more than 200 providers licensed in more than 20 states. *See Declaration of Ralph Cetrulo in Support of Chapter 11 Petition and First Day Motions* [Docket No. 8] (the "First Day Declaration"). Before and after the Petition Date (defined below), the Debtor was managed by Wound Pros pursuant to a Management Services Agreement, under which Wound Pros handled all of the Debtor's non-clinical, administrative, and business operations, including billing and collections and regulatory compliance. *Id.* ¶ 16; Docket No. 450 ¶ 7.

6. After the Centers for Medicare & Medicaid Services ("CMS") suspended all Medicare payments to the Debtor—cutting off approximately 91% of its income—the Debtor filed a voluntary petition for relief under chapter 11 on October 21, 2024 (the "Petition Date"). *See* First Day Declaration ¶¶ 28, 30. The Debtor continues to manage its property as a debtor in possession pursuant to §§ 1107 and 1108. No trustee, examiner, or official committee of unsecured creditors has been appointed.

7. On December 19, 2024, the Court approved the *Stipulation and Agreed Order Regarding Suspension of Medicare Payments to the Debtor* [Docket No. 87] (the "Medicare Stipulation") between the Debtor and the United States. The Medicare Stipulation restored a portion of the Debtor's Medicare payments while the parties sought to negotiate a global resolution

of the United States' claims. Throughout 2025 and 2026, the Debtor and the United States repeatedly extended the United States' deadline to file a proof of claim by Court-approved stipulations as negotiations continued. *See* Docket Nos. 323, 396, 433, 452.

8. In October 2025, CMS finalized rules that dramatically reduced reimbursement for the skin substitute products used by the Debtor. *See* CMS, PFS Final Rule, CMS-1832-F (Oct. 31, 2025); Docket No. 388 ¶ 9; Declaration of Louis E. Robichaux IV [Docket No. 388-2] ¶ 7. As a result, in December 2025, the Debtor suspended operations and terminated the employment of all employees other than its Chief Executive Officer and its Chief Restructuring Officer. *See id.* ¶ 8.

9. The Debtor's negotiations with the United States continued. On September 11, 2026, the Debtor filed its *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 No. 450] (the "9019 Motion") seeking approval of a Settlement Agreement (as defined in the 9019 Motion) with the United States. The Settlement Agreement resolves an asserted claim by the United States of over $1.5 billion. *See* 9019 Motion ¶ 9.

10. On October 2, 2026, Wound Pros filed its opposition to the 9019 Motion [Docket No. 461] (the "Wound Pros Objection").

11. On October 14, 2026, the Court extended the deadlines for the United States to file a proof of claim and for the Debtor to file a motion seeking approval of a disclosure statement and/or the Plan (the "Solicitation Package") under the Settlement Agreement to November 6, 2026. *See Stipulation and Order Extending (A) the Proof of Claim Deadline for the United States and (B) the Settlement Agreement Deadline* [Docket No. 467] ¶¶ 3–4.

12. The Debtor intends to reply to Wound Pros Objection and set the 9019 Motion for hearing. The Debtor will also continue to prepare and proceed towards filing the Plan.

BASIS FOR RELIEF

A. The Applicable Limitations Periods

13. Pursuant to § 546(a)(1), an action or proceeding under §§ 544, 545, 547, 548, or 553 must be commenced before the later of (A) two years after the entry of the order for relief, or (B) one year after the appointment or election of the first trustee under certain enumerated sections, if such appointment or election occurs before the expiration of the period in subparagraph (A). 11 U.S.C. § 546(a)(1). An action under § 549 must be commenced before the earlier of two years after the date of the transfer sought to be avoided or the time the case is closed or dismissed. 11 U.S.C. § 549(d). Likewise, § 108(a) provides that, if an applicable nonbankruptcy limitations period has not expired before the petition date, the trustee may commence the action before the later of the end of that period or two years after the order for relief. 11 U.S.C. § 108(a).

14. The Debtor's voluntary petition, filed October 21, 2024, constituted an order for relief. *See* 11 U.S.C. § 301(b). No trustee has been appointed. Accordingly, absent an extension, the periods under §§ 108(a) and 546(a) expire on October 21, 2026.

B. The Court Should Extend the Debtor's Deadlines for Estate Claims and Avoidance Actions

15. Sections 108(a), 546(a), and 549(d) are statutes of limitations, not jurisdictional bars; therefore, courts may extend these deadlines in appropriate circumstances. *See Morton v. Kievit (In re Vallecito Gas, LLC)*, 461 B.R. 358, 397 (Bankr. N.D. Tex. 2011); *see also In re Kwok*, No. 22-50073, 2024 Bankr. LEXIS 369, at *27 (Bankr. D. Conn. Feb. 15, 2024) (Bankruptcy Rule 9006(b) permits extension of the periods in §§ 108(a), 546(a), and 549(d)); *In re Fundamental Long Term Care, Inc.*, 501 B.R. 784, 787–89 (Bankr. M.D. Fla. 2013) (extending deadlines);

Frentz v. Stites & Harbison (In re ThermoViews Indus.), 381 B.R. 225, 229 (Bankr. W.D. Ky. 2008) ("the bankruptcy court has the discretion to extend the [§ 546] deadlines in appropriate circumstances"). Bankruptcy courts in this District routinely grant such relief. *See In re Uplift RX, LLC*, Case No. 17-32186 (MI), Docket No. 1005 (Bankr. S.D. Tex. Mar. 28, 2019) (order extending time to file avoidance actions); *In re BMI Oldco Inc.*, Case No. 23-90794 (MI), Docket No. 1758 (Bankr. S.D. Tex. Oct. 2, 2025) (order extending time to file estate claims and avoidance actions); *In re Barrow Shaver Res. Co. LLC*, Case No. 24-33353 (ARP), Docket No. 1300 (Bankr. S.D. Tex. July 1, 2026) (order extending deadlines under §§ 108(a), 546(a), and 549(d) by 90 days) (the "Barrow Shaver Order").

16. In July 2026, Judge Pérez extended the deadlines to commence estate claims and avoidance actions in the complex case of *Barrow Shaver* under analogous circumstances. There, the debtor had litigated numerous contested matters and plan issues that limited its ability to complete its investigation of potential estate claims and avoidance actions, and the debtor sought and obtained a 90-day extension of those deadlines. *See* Barrow Shaver Order ¶¶ 1–2. Likewise, here, the Debtor, which has constrained resources, has to obtain resolution of Wound Pros Objection and approval of the 9019 Motion, and meet its Plan deadline with limited resources. Requiring the Debtor, which has one remaining employee, to commence Estate Claims and Avoidance Actions by October 21, 2026, would divert those resources at the most critical juncture of the Case.

RESERVATION OF RIGHTS

17. Though the Debtor will work to reach consensus, the Debtor reserves all rights to bring Estate Claims and Avoidance Actions on or before January 19, 2027. Because this Motion is filed before the expiration of the applicable periods, those periods are automatically extended

until the Court rules on the Motion. *See* Local Bankruptcy Complex Rule K, ¶ 30 ("Unless otherwise provided in the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, or Court order, if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion. An automatic extension under this rule does not require the issuance or entry of an order extending the time.").

NOTICE

18. The Debtor has provided notice of this Motion to: (a) the U.S. Trustee for the Southern District of Texas; (b) the holders of the twenty (20) largest unsecured claims against the Debtor; (c) the Office of the United States Attorney for the Southern District of Texas; (d) the United States Department of Justice, Civil Division; (e) the Centers for Medicare & Medicaid Services; (f) the United States Department of Health & Human Services; (g) counsel to Wound Pros; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtor submits that no other or further notice is required.

WHEREFORE, the Debtor respectfully requests entry of the Proposed Order, expressly enlarging the time periods under §§ 108(a), 546(a), and 549(d) to commence Estate Claims and Avoidance Actions, and granting such other and further relief as the Court may deem just and appropriate.

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Dated: October 21, 2026
Houston, Texas

Respectfully submitted,

DENTONS US LLP

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CERTIFICATE OF SERVICE

I certify that on October 21, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive electronic notice in this Case and on the parties identified in the Notice section above.

/s/ Casey W. Doherty, Jr.
Casey W. Doherty, Jr.

EXHIBIT A

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,	)	Case No. 24-34908 (CML)
Debtor and Debtor in Possession.	)	

ORDER GRANTING DEBTOR'S MOTION TO EXTEND DEADLINES TO FILE ESTATE CLAIMS AND AVOIDANCE ACTIONS PURSUANT TO 11 U.S.C. §§ 108(a), 546(a), AND 549(d) AND BANKRUPTCY RULE 9006(b)

Upon consideration of the *Debtor's Motion to Extend Deadlines to File Estate Claims and Avoidance Actions Pursuant to 11 U.S.C. §§ 108(a), 546(a), and 549(d) and Bankruptcy Rule 9006(b)* (the "Motion") (unless otherwise defined herein, capitalized terms shall have the same meaning as in the Motion) filed by the above-captioned debtor and debtor in possession (the "Debtor"), pursuant to Bankruptcy Rule 9006 and sections 105(a), 108(a), 546(a), and 549(d) of the Bankruptcy Code, as more fully set forth in the Motion; this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; this Court having found that due and proper notice of the Motion was provided and that such notice was adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; this Court having reviewed the Motion; upon any hearing held on the Motion; all objections, if any, to the Motion having been withdrawn, resolved, or overruled; this Court having determined that the legal and factual bases set forth in 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. The deadlines under 11 U.S.C. §§ 108(a) and 546(a) for the Debtor to file the Estate Claims and Avoidance Actions are hereby extended from October 21, 2026, through and including the later of (a) January 19, 2027, or (b) any later otherwise applicable deadline.

2. The deadlines under 11 U.S.C. § 549(d) for the Debtor to commence Avoidance Actions based on postpetition transfers are hereby extended to the later of (a) January 19, 2027, and (b) the date that is 90 days after the deadline otherwise applicable to each such transfer or (c) any later otherwise applicable deadline.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. Notice of the Motion shall be deemed good and sufficient, and the applicable requirements of the Federal Rules of Bankruptcy Procedure and the Bankruptcy Local Rules for the Southern District of Texas are satisfied by such notice.

5. The Debtor is authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

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

Signed: _____, 2026

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CHRISTOPHER M. LOPEZ

UNITED STATES BANKRUPTCY JUDGE