Docket #0477 Date Filed: 10/30/2026
United States Bankruptcy Court
Southern District of Texas
ENTERED
October 14, 2026
Nathan Ochsner, Clerk

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 (A) THE PROOF OF CLAIM DEADLINE FOR THE UNITED STATES AND (B) THE SETTLEMENT AGREEMENT DEADLINE

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," and 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[2], 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

[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.

2434908261031000000000001

remains in possession of its assets and continues to operate its business as a debtor in possession pursuant to §§ 1107 and 1108.

B. During the Bankruptcy Case, the Debtor agreed to extend any deadline for the United States to file a proof of claim in the Bankruptcy Case through and including October 15, 2026 (the "United States Proof of Claim Deadline") through various stipulations approved by the Court. Docket Nos. 323, 396, 433, and 452.

C. 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* (the "9019 Motion") [Docket No. 450] seeking approval of a Settlement Agreement (as defined in the 9019 Motion). The Settlement Agreement contains a provision that requires the Debtor to file a Solicitation Package for a Plan (as both terms are defined in the Settlement Agreement) by October 15, 2026 (the "Plan Deadline"). Settlement Agreement, ¶ 18(b).

D. On October 2, 2026, Wound Pros Management Group, Inc. filed an *Opposition to the Debtor's 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. 461] (the "Objection").

E. The Debtor intends to reply to the Objection and set the 9019 Motion for hearing. The Parties have conferred and concluded that resolution of the 9019 Motion before requiring the United States to file any claim and the Debtor to file a Plan is appropriate.

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.

3. The United States Proof of Claim Deadline is hereby extended to November 6, 2026, provided that such deadline may be further extended by written agreement of the Parties upon approval of the Court.

4. The Plan Deadline is hereby extended to November 6, 2026, provided that such deadline may be further extended by written agreement of the Parties upon approval of the Court.

5. 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.

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

7. 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.

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

9. 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.

Signed: October 14, 2026

Christopher Lopez
United States Bankruptcy Judge

Stipulated and agreed to by:

Dated: October 13, 2026

DENTONS US LLP

/s/ Casey W. Doherty Jr.

Casey W. Doherty Jr.
1300 Post Oak Blvd.
Suite 650
Houston, TX 77056
Phone: (713) 658-4600
Email: casey.doherty@dentons.com

Samuel R. Maizel (admitted *pro hac vice*)
Tania M. Moyron (admitted *pro hac vice*)
601 S. Figueroa Street
Suite 2500
Los Angeles, CA 90017
Telephone: (213) 892-2910
Email: samuel.maizel@dentons.com
Email: tania.moyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

/s/ Andrew Warner
MARC S. SACKS
MARY A. SCHMERGEL
ANDREW WARNER
Commercial Litigation Branch
Civil Division
United States Department of Justice
P.O. Box 875
Ben Franklin Station
Washington D.C. 20044
Tel. (202) 598-7653
Email: Andrew.Warner@usdoj.gov

Counsel for the United States

CERTIFICATE OF SERVICE

This is to certify that I have on October 13, 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.

United States Bankruptcy Court
Southern District of Texas

In re:
Global Wound Care Medical Group, a Profe
Debtor

Case No. 24-34908-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4 User: ADIuser
Date Rcvd: Oct 29, 2026 Form ID: pdf002 Total Noticed: 3

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 30, 2026:

Recip ID		Recipient Name and Address
db	#+	Global Wound Care Medical Group, a Professional Co, 5901 West Century Boulevard, Suite 750, Los Angeles, CA 90045-5443
cr		UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JU, PO BOX 875, WASHINGTON, DC 20044-0875

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID		Notice Type: Email Address	Date/Time	Recipient Name and Address
op	+	Email/Text: kccnoticing@kccllc.com	Oct 29 2026 17:37:00	Kurtzman Carson Consultants, LLC dba Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, UNITED STATES 90245-5614

TOTAL: 1

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Dentons US LLP
aty		Togut, Segal & Segal LLP
intp		180 Health Services, LLC
fa		Ankura Consulting Group, LLC
cr		East West Bank
ombh		Suzanne Richards Patient Care Ombudsman
intp		Wells Fargo Bank, N.A.
cr		Wound Pros Management Group, Inc.

TOTAL: 8 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 30, 2026 Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 14, 2026 at the address(es) listed below:

Name	Email Address
Andrew Douglas Warner	on behalf of Creditor UNITED STATES OF AMERICA C/O U.S. DEPARTMENT OF JUSTICE andrew.warner@usdoj.gov
Casey William Doherty, Jr	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation casey.doherty@dentons.com, Docket.General.Lit.Dal@dentons.com
Christopher Ross Travis	on behalf of U.S. Trustee US Trustee C.Ross.Travis@usdoj.gov
Evan Jon Gershbein	on behalf of Interested Party Kurtzman Carson Consultants LLC d/b/a Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
Evan Jon Gershbein	on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
Frank A. Oswald	on behalf of Attorney Togut Segal & Segal LLP foswald@nixonpeabody.com, nyc.managing.clerk@nixonpeabody.com;cwiseman@nixonpeabody.com;rbutters@nixonpeabody.com
Frank A. Oswald	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation foswald@nixonpeabody.com, nyc.managing.clerk@nixonpeabody.com;cwiseman@nixonpeabody.com;rbutters@nixonpeabody.com
Ha Minh Nguyen	on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov
Jared C Borriello	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation jared.borriello@hsfkramer.com
Jared C Borriello	on behalf of Attorney Togut Segal & Segal LLP jared.borriello@hsfkramer.com
Jared C Borriello	on behalf of Plaintiff Global Wound Care Medical Group a Professional Corporation jared.borriello@hsfkramer.com
Julie Goodrich Harrison	on behalf of Creditor East West Bank julie.harrison@nortonrosefulbright.com
Kyle Ortiz	on behalf of Attorney Togut Segal & Segal LLP kyle.ortiz@hsfkramer.com, dperson@teamtogut.com;arivera@teamtogut.com;acarlin@teamtogut.com;jcohen@teamtogut.com
Kyle Ortiz	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation kyle.ortiz@hsfkramer.com, dperson@teamtogut.com;arivera@teamtogut.com;acarlin@teamtogut.com;jcohen@teamtogut.com
Kyle Ortiz	on behalf of Plaintiff Global Wound Care Medical Group a Professional Corporation kyle.ortiz@hsfkramer.com, dperson@teamtogut.com;arivera@teamtogut.com;acarlin@teamtogut.com;jcohen@teamtogut.com
Nicholas Ried Miller	on behalf of Interested Party 180 Health Services LLC nick.miller@hklaw.com, julia.warren@hklaw.com;hapi@hklaw.com
Oliver Stephen Zeltner	on behalf of Creditor Wound Pros Management Group Inc. ozeltner@jonesday.com, courtalert@jonesday.com
Sean B Davis	on behalf of Defendant Wells Fargo Bank N.A. sbdavis@bakerdonelson.com, jramos@bakerdonelson.com
Sean B Davis	on behalf of Interested Party Wells Fargo Bank N.A. sbdavis@bakerdonelson.com, jramos@bakerdonelson.com
Tania Maria Moyron	on behalf of Debtor Global Wound Care Medical Group a Professional Corporation tania.moyron@dentons.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 21