Docket #0483 Date Filed: 11/03/2026

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.	

SECOND STIPULATION AND ORDER EXTENDING (A) THE PROOF OF CLAIM DEADLINE FOR THE UNITED STATES AND (B) THE SETTLEMENT AGREEMENT DEADLINE

This Second 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.

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. On October 14, 2026, the Court entered an order extending the United States Proof of Claim Deadline and the Plan Deadline to November 6, 2026. Docket No. 467.

F. On October 23, 2026, the Debtor filed its reply in support of the 9019 Motion. Docket No. 471.

G. 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 Solicitation Package 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 fourteen days after a final order is issued on the 9019 Motion, 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 fourteen days after a final order is issued on the 9019 Motion, 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.

Dated: _____, 2026

Judge Christopher M. Lopez
United States Bankruptcy Judge

Stipulated and agreed to by:

Dated: November 3, 2026

DENTONS US LLP

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CERTIFICATE OF SERVICE

This is to certify that I have on November 3, 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.