

ENTERED

November 19, 2025

Nathan Ochsner, Clerk

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

In re:

Chapter 11

GENESIS CARE PTY LIMITED, *et al.*,¹

Case No. 23-90614 (MI)

Reorganized Debtors.

(Jointly Administered)

**STIPULATION AND AGREED ORDER
BETWEEN THE REORGANIZED DEBTORS AND MRKS, INC.
[Relates to Docket Nos. 1957, 1967, 1993 & 2002]**

This Stipulation and Agreed Order (the “Stipulation”) is entered into by and among the above-captioned Reorganized Debtors (“GenesisCare”) and MRKS, Inc., Maureen Raynaud, and Kevin Sanders, M.D. (collectively, “MRKS” and together with GenesisCare, the “Parties”) regarding (i) the *Reorganized Debtors’ Motion for Entry of an Order Enforcing Investment Agreement Approved Pursuant to the Bidding Procedures Order* [Docket No. 1957] (the “Motion to Compel”)² and (ii) *Order to Show Cause* [Docket No. 1993] (the “Order to Show Cause” and together with the Motion to Compel, the “Dispute”). The Parties hereby stipulate and agree as follows:

WHEREAS, GenesisCare filed the Motion to Compel on November 5, 2024;

WHEREAS, the Court entered an order granting the Motion to Compel on December 2, 2024;

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/GenesisCare>. The location of the Reorganized Debtors’ principal place of business and their service address in these Chapter 11 Cases is: 1419 SE 8th Terrace, Suite 200, Cape Coral, Florida 33990.

² Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Motion to Compel.

WHEREAS, GenesisCare filed its *Motion for Entry of an Order to Appear and Show Cause as to Why MRKS, Inc. Should Not be Held in Contempt for Failure to Comply with this Court's Order Granting Motion to Enforce Investment Agreement* [Docket No. 1987] on December 31, 2024;

WHEREAS, the Court entered the Order to Show Cause on January 22, 2025;

WHEREAS, MRKS filed the *Response of MRKS, Inc., Maureen Raynaud, and Kevin Sanders, MD to Order to Show Cause* [Docket No. 2002] on January 29, 2025;

WHEREAS, a hearing was held on the Order to Show Cause on January 31, 2025, at which MRKS, Maureen Raynaud, and Kevin Sanders, MD appeared;

WHEREAS, by agreement between the Parties, MRKS deposited with GenesisCare the amount of \$148,558.52 on February 12, 2025, which amount has been held in trust by McDermott Will & Schulte, LLP (“MWS”) pending resolution of the Dispute (the “Escrow Amount”);

WHEREAS status conferences were held regarding the Dispute on March 28, 2025, and June 4, 2025;

WHEREAS, an evidentiary hearing was held with respect to the Dispute on July 30, 2025, and which was continued to October 29, 2025, as to certain remaining issues;

WHEREAS, the Parties have agreed, subject to the approval of the Bankruptcy Court, to compromise and settle all disputes between them related to the Dispute and the Transaction.

NOW, THEREFORE, after good-faith, arms-length negotiations, and in consideration of the foregoing, it is hereby **STIPULATED AND AGREED**, and upon approval by the Bankruptcy Court of this Stipulation, it is **ORDERED**, as follows:

1. The foregoing recitals are hereby incorporated by reference into this Stipulation with the same force and effect as if fully set forth herein.

2. MRKS shall pay to GenesisCare the amount of \$70,000 (the “Settlement Payment”) in full and final satisfaction of the Dispute.

3. In consideration and satisfaction of the foregoing, GenesisCare shall direct MWS to release the Escrow Amount, less the Settlement Payment, to MRKS not later than 5 business days following approval and entry of this Stipulation by the Bankruptcy Court.

4. Each of GenesisCare and MRKS, and their respective principals, affiliates, employees, agents, servants, representatives, administrators, attorneys, predecessors, successors, assigns, and anyone claiming through any of the foregoing, as applicable, hereby completely release, remise, acquit, satisfy and forever discharge the other from any and all claims or counterclaims which were asserted or could have been asserted among the Parties related to the Transaction.

5. Each Party shall bear its own legal fees and expenses related to the Motion to Compel and Order to Show Cause.

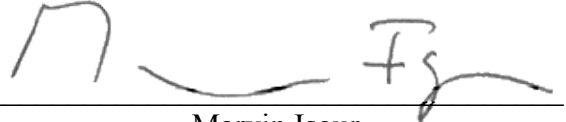
6. The Parties are authorized and empowered to take all actions necessary to effectuate the relief granted in this Stipulation.

7. The Court retains jurisdiction to hear and determine any and all matters arising from the interpretation and/or implementation of this Order.

WHEREFORE, this Stipulation has been executed and delivered as of the date first written below.

SO ORDERED

Signed: November 19, 2025



Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the date written below.

Dated: October 28, 2025

/s/ Eric C. Seitz

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***COUNSEL FOR MRKS, INC., MAUREEN
RAYNAUD, and KEVIN SANDERS, MD***

CERTIFICATE OF SERVICE

I certify that, on October 28, 2025, a true and correct copy of the foregoing document was served on all parties who receive service in these jointly administered Chapter 11 Cases via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, including counsel for MRKS, Inc., Maureen Raynaud, and Kevin Sanders, MD.

/s/ Eric C. Seitz
Eric C. Seitz