

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

**ENTERED**  
November 26, 2024  
Nathan Ochsner, Clerk

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a  
Professional Corporation,<sup>2</sup>

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**ORDER GRANTING DEBTOR’S MOTION FOR ENTRY OF AN ORDER  
ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION  
AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Upon the motion (the “Motion”)<sup>3</sup> of the above-captioned debtor and debtor in possession (the “Debtor”) for entry of an order (this “Order”) establishing procedures for interim compensation and reimbursement of expenses for Retained Professionals; this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that (a) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (b) it may enter a final order consistent with Article III of the United States Constitution; (c) venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; (d) the Compensation Procedures set forth below are reasonable and appropriate for this case; and (e) the Debtor’s notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion; and 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,

<sup>2</sup> The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.

<sup>3</sup> Capitalized terms used herein but not otherwise defined shall have the meanings given to them in the Motion.



IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. Except as otherwise provided in an order of the Court authorizing the retention of a particular professional, the professionals specifically retained pursuant to an order of the Court in the case (collectively, the “Retained Professionals”) may seek interim payment of compensation and reimbursement of expenses in accordance with the following procedures (collectively, the “Compensation Procedures”):

- a. Each Retained Professional seeking monthly compensation must submit a monthly fee statement (a “Monthly Fee Statement”), which submission may be via hand delivery, overnight courier, first class mail, or e-mail, so as to be received no later than thirty (30) days after the end of the month for which the fees are sought, to the following parties (collectively, the “Notice Parties”):
  - i. the Debtor: c/o Global Wound Care Medical Group, a Professional Corporation, Attn: C. Keith Greer, Esq., General Counsel, Greer & Associates, APC, 16855 W. Bernardo Dr., Suite 255, San Diego, CA 92127 ([keith.greer@greerlaw.biz](mailto:keith.greer@greerlaw.biz));
  - ii. the proposed attorneys to the Debtor: Dentons US LLP, Attn: Casey Doherty, 1300 Post Oak Blvd., Suite 650, Houston, TX 77056 ([casey.doherty@dentons.com](mailto:casey.doherty@dentons.com)) and Tania Moyron, 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017 ([tania.moyron@dentons.com](mailto:tania.moyron@dentons.com));
  - iii. the Office of the United States Trustee for the Southern District of Texas, Attn: Ha Nguyen, 515 Rusk Ave., Suite 3516, Houston, TX 77002 ([Ha.Nguyen@usdoj.gov](mailto:Ha.Nguyen@usdoj.gov));
  - iv. the attorneys for any statutory committee appointed in this chapter 11 case; and
  - v. any other parties that the Court may designate.
- b. Unless otherwise provided in the order authorizing the Retained Professional’s retention, each Retained Professional’s Monthly Fee Statement, in accordance with LBR 2016-1, shall include (i) a monthly invoice with fee and expense detail that describes the fees and expenses incurred by such Retained Professional, and (ii) any additional information required by the *Procedures for Complex Cases in the Southern District of Texas*,

[https://www.txs.uscourts.gov/sites/txs/files/Complex\\_11\\_Procedures\\_010\\_32023.pdf](https://www.txs.uscourts.gov/sites/txs/files/Complex_11_Procedures_010_32023.pdf) (the “Complex Procedures”), the LBR, the Bankruptcy Rules, the Court, or applicable law.

- c. Any Retained Professional who fails to submit a Monthly Fee Statement for a particular month or months may subsequently submit a consolidated Monthly Fee Statement for multiple months provided that separate fee and expense information for each applicable month is provided in the consolidated statement.
- d. All Monthly Fee Statements shall comply with the Bankruptcy Code, the Bankruptcy Rules, the LBR, the Complex Procedures and applicable law.
- e. Each Notice Party will have fourteen (14) days after service of a Monthly Fee Statement to object to such statement (the “Objection Deadline”). Upon the expiration of the Objection Deadline, the Debtor will be authorized to pay each Retained Professional an amount (the “Authorized Payment”) equal to the lesser of (i) 80% of the fees and 100% of the expenses requested in the Monthly Fee Statement (the “Maximum Payment”) and (ii) the aggregate amount of fees and expenses not subject to an unresolved objection pursuant to paragraph 10(f) below.
- f. If any Notice Party objects to a Retained Professional’s Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within fourteen (14) days after service of the Objection, or such later date as may be agreed upon by the objecting Notice Party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the “Incremental Amount”) and schedule such matter for hearing on at least fourteen (14) days’ notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that Notice Party’s right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.
- g. Following the Objection Deadline, each Retained Professional that has not already submitted an electronic bill to the Debtor shall email to Debtor’s proposed counsel Casey Doherty ([casey.doherty@dentons.com](mailto:casey.doherty@dentons.com)) and Tania Moyron ([tania.moyron@dentons.com](mailto:tania.moyron@dentons.com)) an invoice reflecting amounts then

payable pursuant to paragraph 10(f) above in .PDF format (or in such other format reasonably requested by the Debtor).

- h. Each Retained Professional may submit its first Monthly Fee Statement on or before December 2, 2024, and such Monthly Fee Statement shall be for the period from October 21, 2024, through and including November 30, 2024.
- i. Upon the initial period of October 21, 2024, to January 31, 2025, and thereafter, each subsequent three-month period, (each, an “Interim Fee Period”), each of the Retained Professionals will file with the Court and serve on the Notice Parties an application pursuant to §§ 330 and 331 of the Bankruptcy Code (an “Interim Fee Application”) for interim Court approval and allowance of the compensation and reimbursement of expenses sought by the Retained Professional in its Monthly Fee Statements for the applicable Interim Fee Period, including: (i) any revisions to the fee detail previously submitted with a Monthly Fee Statement; (ii) any consensual resolution of an Objection to one or more Monthly Fee Statements; and (iii) any difference between any amounts owed to the Retained Professional and the Authorized Payments made with respect to the Interim Fee Period. Retained Professionals also will file a notice of opportunity for hearing in accordance with LBR 9013-1(d), which shall be served on the Notice Parties and all parties that have filed a notice of appearance with the Clerk of the Court and requested such notice. To the extent practicable, all Interim Fee Applications will be noticed together to be heard on the same hearing date and with the same objection deadline.
- j. Interim Fee Applications must be filed on or before the 30th day after the end of the Interim Fee Period (or the next business day if such day is not a business day) for which the application seeks allowance of fees and reimbursement of expenses. An Interim Fee Application must include a basic summary of the Monthly Fee Statements that are the subject of the request and any other information requested by the Court or required by the Bankruptcy Rules and the LBR, the Complex Procedures (including, without limitation, section V of the Complex Procedures) and the procedures of the Bankruptcy Court available at <https://www.txs.uscourts.gov/sites/txs/files/Lopez%20Court%20Procedure%20s.pdf> (including, without limitation, section 12 of the Bankruptcy Court’s procedures), and a Retained Professional filing an Interim Fee Application shall comply with the these provisions, as applicable.
- k. The first Interim Fee Application must be filed on or before February 28, 2025, for the Interim Fee Period from October 21, 2024, through January 31, 2025. Any objections to an Interim Fee Application (an “Additional Objection”) shall be filed with the Court and served upon the affected Retained Professional and the Notice Parties so as to be received on or before the 14th day (or the next business day if such day is not a business day) following the filing and service of the Interim Fee Application, which

service may be via e-mail, hand delivery, overnight courier or first class mail. If no Objections are pending and no Additional Objections are timely filed, the Court may grant an Interim Fee Application without a hearing. Upon allowance by the Court of a Retained Professional's Interim Fee Application, the Debtor shall be authorized to promptly pay such Retained Professional all requested fees and expenses not previously paid (including any Incremental Amount).

- l. Upon allowance by the Court of a Retained Professional's Interim Fee Application, with or without a hearing, such Retained Professional shall email to Debtor's proposed counsel Casey Doherty ([casey.doherty@dentons.com](mailto:casey.doherty@dentons.com)) and Tania Moyron ([tania.moyron@dentons.com](mailto:tania.moyron@dentons.com)) an invoice reflecting all allowed, requested fees and expenses not previously paid (including any Incremental Amount) in .PDF format (or in such other format reasonably requested by the Debtor). For the avoidance of doubt, a Retained Professional shall not be required to include in such invoices fee and expense detail or other information already submitted to the Notice Parties in connection with Monthly Fee Statements or otherwise.
- m. The pendency of an Objection or Additional Objection or the entry of a Court order holding that the prior payment of compensation or the reimbursement of expenses was improper as to a particular Monthly Fee Statement will not disqualify a Retained Professional from the future payment of compensation or reimbursement of expenses as set forth above, unless the Court orders otherwise.
- n. There will be no penalties for failing to file a Monthly Fee Statement or an Interim Fee Application in a timely manner; provided, however, that if any Interim Fee Application covers more than a three-month period, the Notice Parties shall have an additional fourteen (14) days beyond the period set forth in paragraph 10(k) above to file an Additional Objection.
- o. Neither (i) the payment of or the failure to pay, in whole or in part, interim compensation and reimbursement of expenses under the Compensation Procedures nor (ii) the filing of, or failure to file, an Objection to any Monthly Fee Statement or an Additional Objection to any Interim Fee Application will bind any party in interest or the Court with respect to the final applications for allowance of compensation and reimbursement of expenses of Retained Professionals.
- p. Any Notice Party may request that a Retained Professional deliver a Monthly Fee Statement or an Interim Fee Application in an electronically searchable format mutually acceptable to the parties.

3. Notice given in accordance with the Compensation Procedures is deemed sufficient and adequate and in full compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the LBR and the Complex Procedures.

4. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. This Court shall retain exclusive jurisdiction over all matters arising from or related to the implementation, enforcement or interpretation of this Order.

Signed: November 26, 2024

  
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Christopher Lopez  
United States Bankruptcy Judge