

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

IN RE: §
§
GLOBAL WOUND CARE MEDICAL § **Case No. 24-34908 (CML)**
GROUP, a Professional Corporation,¹ § **(Chapter 11)**
§
DEBTOR. §

**NOTICE OF APPEARANCE, REQUEST FOR ALL
NOTICES, AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Winstead PC ("Winstead") appears on behalf of Wells Fargo Bank, N.A. ("Wells Fargo") and hereby submits this notice of appearance in the above-captioned proceeding and requests notice of all hearings and conferences herein and makes a demand for service of all papers herein, including all papers and notices pursuant to Rules 2002, 3011, 3017, 5009, 9007, and 9010 (if applicable) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 342 and 1109(b) (if applicable) of title 11 of the U.S. Code (the "Bankruptcy Code").

All notices given or required to be given in this Chapter 11 Case shall be given to and served upon Winstead at the following address:

Sean B. Davis
WINSTEAD PC
600 Travis Street
Suite 5200
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400
E-mail: sbdavis@winstead.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code

¹ The last four digits of the Debtor's tax identification number in the jurisdiction in which it operates is 3572.



specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, discovery request, deposition notice, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced Chapter 11 Case and any proceedings related thereto.

PLEASE TAKE FURTHER NOTICE that Wells Fargo intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (i) the right of Wells Fargo to object and/or not consent to entry of final orders by a Bankruptcy Judge in non-core matters and request that final orders in non-core matters be entered only after de novo review by a District Judge; (ii) the right of Wells Fargo to a trial by jury in any proceedings so triable in this Chapter 11 Case or any case, controversy or proceeding related to this Chapter 11 Case; (iii) the right of Wells Fargo to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or, (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Wells Fargo is or may be entitled under agreements, at law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments the undersigned expressly reserves on behalf of Wells Fargo.

DATED: April 4, 2025.

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Respectfully submitted,

WINSTEAD PC
600 Travis Street
Suite 5200
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400

By: /s/ Sean B. Davis
Sean B. Davis
Texas Bar No. 24069583
S.D. Tex. No. 1048341
E-mail: sbdavis@winstead.com

**ATTORNEYS FOR WELLS FARGO BANK,
N.A.**

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2025, a true and correct copy of the foregoing Notice of Appearance was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Sean B. Davis
One of Counsel