

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,  
a Professional Corporation,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**SEVENTH MONTHLY FEE STATEMENT OF DENTONS US LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF EXPENSES INCURRED AS BANKRUPTCY  
COUNSEL TO THE DEBTORS FOR THE PERIOD FROM  
MAY 1, 2025 THROUGH MAY 31, 2025**

Pursuant to the Interim Compensation Order, Dentons US LLP (“Dentons”) hereby submits this seventh monthly fee statement (the “Fee Statement”) for compensation for services rendered and for reimbursement of expenses as counsel to the above-captioned debtor and debtor-in-possession (the “Debtor”) for the period from May 1, 2025, through May 31, 2025 (the “Application Period”). A summary chart setting forth the compensation and expenses during the Application Period is set forth below:

**SUMMARY CHART**

Name of Applicant:	Dentons US LLP	
Applicant’s Role in Case:	Counsel to Debtor	
Date Order of Employment Signed:	11/26/2024 [Docket No. 69]	
	Beginning of Period	End of Period
Time period covered by this Fee Statement:	5/01/2025	5/31/2025
Time period(s) covered by prior Fee Statements:	10/21/2024	4/30/2025

<sup>1</sup> The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.



Total amounts paid on all prior Fee Statements:	\$903,267.85
Total fees requested in this Fee Statement (80% of \$101,398.90):	\$81,119.12
Total professional fees requested in this Fee Statement:	\$95,234.80
Amount of professional fees requested paid in this Fee Statement:	\$76,187.84
Total actual professional hours covered by this Fee Statement:	103.60
Average hourly rate for professionals:	\$919.25
Total paraprofessional fees requested in this Fee Statement (80% of \$6,164.10):	\$4,931.28
Total actual paraprofessional hours covered by this Fee Statement:	15.60
Average hourly rate for paraprofessionals:	\$395.13
Reimbursable expenses sought in this Fee Statement:	\$0.00
Total to be Paid to Priority Unsecured Creditors:	Not yet known
Anticipated % Dividend to Priority Unsecured Creditors:	Not yet known
Total to be Paid to General Unsecured Creditors:	Not yet known
Anticipated % Dividend to General Unsecured Creditors:	Not yet known
Date of Confirmation Hearing:	Not yet set
Indicate whether plan has been confirmed:	No

### **OBJECTION DEADLINE**

***In accordance with the Order Granting Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 68] (the "Interim Compensation Order"), each Notice Party or any other party in interest will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen (14) days after the filing of this Fee Statement ("Objection Deadline") to object to the requested fees and expenses in accordance with the procedures described in the Interim Compensation Order. Upon the expiration of the Objection Deadline, the Debtors are authorized to promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Statement.***

**DETAIL FOR SERVICES RENDERED AND EXPENSES INCURRED**

1. On October 21, 2024, the Debtor commenced this proceeding with the filing of a voluntary petition under Chapter 11 of Title 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its affairs as a debtor-in-possession. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, no trustee or examiner has been appointed in the Chapter 11 case. No creditors committee has been appointed.

2. On October 25, 2024, the Debtor filed its *Application for Entry of an Order Authorizing the Employment and Retention of Dentons US LLP as Bankruptcy Counsel, Effective as of the Petition Date* [Docket No. 25] (the “Application”). The Court entered an order approving the Application on November 26, 2024 [Docket No. 69].

3. On December 2, 2024, Dentons filed its *First Monthly Fee Statement* [Docket No. 74]; on February 25, 2025, Dentons filed its *Second Monthly Fee Statement* [Docket No. 126]; on April 30, 2025, Dentons filed its *Third Monthly Fee Statement* [Docket No. 185]; on July 2, 2025, Dentons filed its *Fourth Monthly Fee Statement* [Docket No. 223]; on July 3, 2025, Dentons filed its *Fifth Monthly Fee Statement* [Docket No. 224]; and on July 10, 2025, Dentons filed its *Sixth Monthly Fee Statement* [Docket No. 226].

4. In accordance with the procedures set forth in the *Debtor’s Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses* [Docket No. 26] (the “Interim Procedures Motion”), on which the Court entered an order approving the Interim Procedures Motion on November 26, 2024 [Docket No. 68] (the “Interim Compensation Order”), Dentons requests payment of \$81,119.12 (80% of \$101,398.90), as compensation for reasonable and necessary legal services rendered, which includes a fee reduction

of \$5,000.00, made pursuant to Dentons' billing judgment with regard to fees in Category of Service B160.

5. In support of this Fee Statement, attached are the following exhibits:

- Exhibit A (Compensation by Project Category) is a schedule of the aggregate number of hours expended and fees incurred by project category;
- Exhibit B (Compensation by Professional) is a schedule of certain information regarding the Dentons attorneys and paraprofessionals for whose services compensation is sought in this Fee Statement;
- Exhibit C (Expenses by Category) is a schedule of the expenses incurred by category for which reimbursement is sought in this Fee Statement (Dentons did not incur expenses during this Application Period); and
- Exhibit D (Invoice) consists of Dentons' detailed records (including the relevant time entry and description and expense detail) for services rendered and reimbursement of expenses incurred during the Application Period.

#### **NOTICE**

6. Pursuant to the Interim Compensation Order, notice of this Fee Statement will be provided to the following Notice Parties via electronic mail: (a) the Debtor: Global Wound Care Medical Group, a Professional Corporation, % Owen B. Ellington, M.D., 2400 Augusta Drive, Suite 369, Houston, Texas 77057 (oellington@thewoundpros.com); (b) Raymond Millien, General Counsel, Wound Pros Management Group, 5901 West Century Boulevard, Suite 250, Los Angeles, California 90045 (raymond.millien@woundpros.com); (c) the Office of the U.S. Trustee for the Southern District of Texas, Attn: Ha Nguyen, 515 Rusk Street, Suite 3516, Houston, Texas 77002 (ha.nguyen@usdoj.gov); and (d) any other parties that the Court may designate.

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**CONCLUSION**

Wherefore, Dentons respectfully requests payment of its fees incurred during the Application Period in the total amount of \$81,119.12, which is 80% of \$101,398.90 of the fees incurred by the Debtors for reasonable and necessary legal services rendered by Dentons in accordance with the procedures set forth in the Interim Compensation Order.

Dated: July 14, 2025

Respectfully submitted,

/s/ Casey W. Doherty, Jr.

Casey W. Doherty, Jr.

Dentons US LLP

1300 Post Oak Boulevard, Suite 650

Houston, Texas 77056

Phone: 713 658 4600

Email: casey.doherty@dentons.com

Samuel R. Maizel (*admitted pro hac vice*)

Tania M. Moyron (*admitted pro hac vice*)

Dentons US LLP

601 South Figueroa Street, Suite 2500

Los Angeles, California 90017-5704

Phone: 213 623 9300

Email: samuel.maizel@dentons.com

tania.moyron@dentons.com

*Counsel to the Debtor and Debtor-in-Possession*

**CERTIFICATE OF SERVICE**

This is to certify that I have on July 14, 2025, 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.

**EXHIBIT A****COMPENSATION BY PROJECT CATEGORY**

<b>Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
B110	Case Administration	14.50	\$14,355.90
B140	Relief from Stay/Adequate Protection Proceedings	1.90	\$2,091.60
B160	Fee Applications/Employment Applications	48.10	\$36,492.30
B190	Other Contested Matters	2.20	\$2,168.10
B300	Claims and Plan	2.10	\$1,871.10
B320	Plan & Disclosure Statement (including Business Plan)	17.80	\$16,346.70
MED/CMS	Medicare/CMS Issues	32.60	\$33,073.20
	<b><i>Sub-Total</i></b>	<b>119.20</b>	<b>\$106,398.90</b>
	<b><i>Fee Reduction<sup>2</sup></i></b>		<b>(\$5,000.00)</b>
	<b><i>Total</i></b>		<b>\$101,398.90</b>

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<sup>2</sup> Dentons reduced the fees by \$5,000 relating to work performed in Category of Service B160.

**EXHIBIT B****COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position</b>	<b>Admission Date</b>	<b>Hourly Rate</b>	<b>Hours Billed</b>	<b>Total Fees</b>
Samuel R. Maizel	Partner	1997	\$1,125.00	20.60	\$23,175.00
Tania M. Moyron	Partner	2005	\$985.50	24.00	\$23,652.00
John A. Moe, II	Partner	1975	\$904.50	22.40	\$20,260.80
Geoffrey M. Miller	Partner	2012	\$891.00	28.30	\$25,215.30
Sarah M. Schrag	Associate	2016	\$963.00	7.50	\$7,222.50
Casey W. Doherty, Jr.	Associate	2011	\$886.50	.80	\$709.20
George L. Medina	Sr. Paralegal	N/A	\$418.50	2.10	\$878.85
Kathryn Howard	Sr. Paralegal	N/A	\$391.50	13.50	\$5,285.25
<b><i>Sub-Total</i></b>				<b>119.20</b>	<b>\$106,398.90</b>
<b><i>Fee Reduction</i><sup>3</sup></b>					<b>(\$5,000.00)</b>
<b><i>Total</i></b>					<b>\$101,398.90</b>

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<sup>3</sup> Dentons reduced the fees by \$5,000 relating to work performed in Category of Service B160



**EXHIBIT C**

**EXPENSES BY CATEGORY**

<b>Expense</b>	<b>Total</b>
None	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

**EXHIBIT D**

**INVOICE**

Global Wound Care Medical Group, A Professional Corporation  
5901 W. Century Blvd.  
Suite 750  
Los Angeles CA 90045  
United States

July 9, 2025

**Invoice No. 2860890**

Client: 15816151

Payment Due Upon Receipt

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Total This Invoice \$ 101,398.90

Please return this page with your payment  
To pay by E-Check - <https://www.e-billexpress.com/ebpp/DentonsUS>

Payments by check should be sent to:

Dentons US LLP  
Dept. 3078  
Carol Stream, IL 60132-3078

OR

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 West Monroe, Chicago, IL 60606  
ABA Transit #: 271070801  
Account #: 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33  
Reference Invoice # and/or Client Matter #

**\*\*Please validate any request to change/update electronic payment instructions on  
file or mailing address by contacting Dentons US LLP directly\*\***

Please send payment remittance advice information to [cashreceipts@dentons.com](mailto:cashreceipts@dentons.com)  
In order to guarantee proper allocation of payments

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730  
Questions relating to this invoice should be directed to:  
S. Maizel  
at 1 213 623 9300

Global Wound Care Medical Group, A Professional Corporation  
5901 W. Century Blvd.  
Suite 750  
Los Angeles CA 90045  
United States

July 9, 2025

**Invoice No. 2860890**

For Professional Services Rendered through May 31, 2025:

Matter: 15816151-000002  
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/25	S. Maizel	0.20	225.00	B110	Telephone conference with T. Moyron re pending issues.
05/01/25	T. Moyron	0.20	197.10	B110	Call with S. Maizel re pending issues.
05/01/25	T. Moyron	0.30	295.65	B110	Correspond with UST and Togut firm regarding Mid Penn Bank (.2); further correspondence re same (.1).
05/06/25	C. Doherty, Jr.	0.10	88.65	B110	Attention to email from UST requesting information.
05/06/25	T. Moyron	0.10	98.55	B110	Correspond with UST re MORs and status.
05/06/25	T. Moyron	0.50	492.75	B110	Daily huddle with K. Manning, R. Cetrulo, R. Millien, S. Maizel, I. Lee, et al., re pending matters including DOJ status, MOR, and other matters.
05/07/25	T. Moyron	0.20	197.10	B110	Correspond with counsel for Mid Penn bank.
05/08/25	S. Maizel	0.30	337.50	B110	Telephone conference with K. Sallie, counsel for Mid Penn Bank re UST obligations.
05/08/25	S. Maizel	0.70	787.50	B110	Zoom conference with R. Cetrulo, K. Manning, I. Lee, etc. re pending issues.
05/08/25	S. Maizel	0.30	337.50	B110	Review and respond to emails re MOR and UST fees.
05/08/25	T. Moyron	0.70	689.85	B110	Call with counsel for Mid Penn bank re new account and UST requirements (.3); analyze emails re same (.3); call with UST re same (.1).
05/08/25	T. Moyron	0.30	295.65	B110	Correspondence from the UST re MOR (.1); correspondence from I. Lee, R. Cetrulo, et al., re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/08/25	T. Moyron	0.60	591.30	B110	Daily huddle with R. Cetrulo, et al. and corresponding regarding pending issues.
05/09/25	G. Medina	0.40	167.40	B110	Prepare and file February 2025 MOR.
05/09/25	S. Maizel	0.10	112.50	B110	Review and respond to emails re filing of MOR.
05/09/25	S. Maizel	0.10	112.50	B110	Review and respond to emails re financial reporting.
05/09/25	S. Maizel	0.10	112.50	B110	Review and respond to email re PCO report.
05/13/25	T. Moyron	0.20	197.10	B110	Emails from I. Lee, et al., re MOR.
05/14/25	T. Moyron	0.20	197.10	B110	Correspondence from J. Lau, et al. re MOR.
05/15/25	T. Moyron	0.40	394.20	B110	Analyze emails regarding Wells Fargo stipulation and related timing of opening accounts (.2); analyze emails from Mid Penn Bank, et al., re collateral to open account, etc. (.2).
05/15/25	T. Moyron	0.30	295.65	B110	Correspondence with I. Lee, et al., regarding MOR and filing of same.
05/15/25	C. Doherty, Jr.	0.30	265.95	B110	Review and provide comments to fee application based upon local practice and rules.
05/15/25	S. Maizel	0.70	787.50	B110	Zoom conference re pending issues with HLB attorneys, R. Cetrulo, Ankura, etc. (.5); telephone conference with T. Moyron re same (.2).
05/16/25	G. Medina	0.30	125.55	B110	Review and file March Monthly operating report.
05/16/25	T. Moyron	0.60	591.30	B110	Analyze stipulation and updated redline (.3); correspond with Togut and R. Cetrulo re same (.3).
05/17/25	S. Maizel	0.20	225.00	B110	Review and respond to emails from PCO re reporting.
05/18/25	S. Maizel	0.30	337.50	B110	Telephone conference with T. Moyron re pending issues.
05/20/25	S. Maizel	0.20	225.00	B110	Telephone conference with T. Moyron re pending issues.
05/20/25	T. Moyron	0.40	394.20	B110	Daily huddle with R. Millien, R. Cetrulo, et al., regarding proposed structure, demand, and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/20/25	S. Schrag	3.70	3,563.10	B110	Further prepare corporate structure description in plan.
05/21/25	S. Maizel	0.20	225.00	B110	Zoom conference with Togut attorneys, etc. re Wells Fargo issues.
05/22/25	T. Moyron	0.50	492.75	B110	Participate on conference call with S. Maizel, B. Sun (Norton Rose), R. Cetrulo (GWC), R. Millien regarding settlement, MOR financials, and bank account.
05/27/25	S. Maizel	0.10	112.50	B110	Telephone conference with T. Moyron re pending issues.
05/29/25	S. Maizel	0.70	787.50	B110	Telephone conference with R. Cetrulo, Dr. Ellington, K. Manning, etc. re pending issues (.4); telephone conference with T. Moyron re same (.3).
	Subtotal	14.50	14,355.90		

B140 - Relief from Stay/Adequate Protection Proceedings

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/25	S. Maizel	1.00	1,125.00	B140	Review communications and pleadings re Wells Fargo motion to lift stay and close bank account (.5); zoom conference with Togut attorneys, R. Cetrulo, etc. re negotiations to resolve Wells Fargo motion to lift stay (.5).
05/09/25	S. Maizel	0.20	225.00	B140	Review and respond to emails from A. Glubach, Togut, re settlement of Wells Fargo motion to lift stay.
05/12/25	S. Maizel	0.50	562.50	B140	Zoom conference with Togut attorneys re resolving Wells Fargo motion to lift stay (.3); review and respond to emails re same (.2).
05/23/25	J.A. Moe, II	0.10	90.45	B140	Review Stipulation And Order regarding Motion For Stay Relief And Emergency Motion.
05/23/25	C. Doherty, Jr.	0.10	88.65	B140	Attention to stipulation filed with Wells Fargo.
	Subtotal	1.90	2,091.60		

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B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
05/05/25	J.A. Moe, II	0.20	180.90	B160	Review previous Memorandum on Fee Statements; prepare updated Memorandum on filing of the Third Monthly Fee Statement; review of Exhibits to the Fourth and Fifth Monthly Fee Statements; and preparation of the Second Interim Fee Application.
05/06/25	J.A. Moe, II	0.40	361.80	B160	Prepare and review draft of the Fifth Monthly Fee Statement.
05/06/25	J.A. Moe, II	0.20	180.90	B160	Revise and review the Fourth Monthly Fee Statement.
05/07/25	J.A. Moe, II	0.20	180.90	B160	Draft Second Interim Fee Application.
05/08/25	J.A. Moe, II	0.50	452.25	B160	Drafting the Second Interim Fee Application.
05/08/25	G. Miller	0.70	623.70	B160	Prepare Fifth Ankura Monthly Fee Statement.
05/08/25	G. Miller	1.90	1,692.90	B160	Prepare Ankura First Interim Fee Application.
05/09/25	G. Miller	1.50	1,336.50	B160	Further prepare Ankura interim fee application.
05/09/25	J.A. Moe, II	1.10	994.95	B160	Drafting Fifth Monthly Fee Statement.
05/09/25	J.A. Moe, II	0.20	180.90	B160	Review the Third Monthly Fee Statement re inclusion into Second Interim Fee Application.
05/09/25	J.A. Moe, II	0.20	180.90	B160	Completing descriptions of services in the Fourth Monthly Fee Statement.
05/09/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re February monthly statement.
05/09/25	K.M. Howard	0.50	195.75	B160	Review email from J. Moe regarding Dentons' Fifth Monthly Fee Application (.1); reviewed attached documents including billing statement in conjunction with preparing same (.4).
05/12/25	G. Miller	0.30	267.30	B160	Prepare Ankura interim fee application.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/25	J.A. Moe, II	3.50	3,165.75	B160	Continue preparation of Second Interim Fee Application (.10); prepare Categories of Services reflected in the Monthly Fee Statements (.40); prepare narrative on services performed for the Fee Application (2.30); initial review of the Court's Docket, highlighting pleadings to be identified in the Fee Application (.10); revise draft of descriptions of services performed by Dentons (.70).
05/13/25	G. Miller	4.80	4,276.80	B160	Prepare Ankura interim fee application and related exhibits (4.2); Review applicable local and complex rules (.6).
05/13/25	J.A. Moe, II	3.10	2,803.95	B160	Revise the descriptions of Services in the Second Interim Fee Application (2.60); prepare list of key personnel for references in the Interim Fee Application (.30); revise the proposed Order, the Declaration Of Sam Maizel and the Charts for the Fee Application (.20).
05/14/25	J.A. Moe, II	0.40	361.80	B160	Exchange E-Mails with Sam Maizel and Tania Moyron on the Fourth Monthly Fee Statement.
05/14/25	J.A. Moe, II	0.30	271.35	B160	Revise the Fourth Monthly Fee Statement.
05/14/25	J.A. Moe, II	0.60	542.70	B160	Revise the Second Interim Fee Application.
05/14/25	S. Maizel	0.20	225.00	B160	Review and respond to emails re quarterly fee statement.
05/15/25	G. Miller	1.00	891.00	B160	Further prepare Ankura interim fee application.
05/15/25	G. Miller	0.40	356.40	B160	Review interim fee order and Ankura retention order.
05/15/25	G. Miller	0.20	178.20	B160	Call with C. Doherty re interim compensation procedures.



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Date	Timekeeper	Hours	Amount	Task	Narrative
05/16/25	K.M. Howard	3.70	1,448.55	B160	Review billing statements for March 2025 (.7); prepare Compensation by Project Category Chart (.4); prepare Compensation by Professional Chart (.7); prepare Expense Chart (.3); prepare Dentons Fifth Monthly Fee Application for March 2025 including revisions thereto (1.4); prepare email to J. Moe regarding the fee application (.1); email exchanges with J. Moe regarding same (.1).
05/16/25	G. Miller	0.30	267.30	B160	Further prepare Ankura interim fee application.
05/16/25	J.A. Moe, II	1.10	994.95	B160	Review Fifth Monthly Fee Statement (.30); review and revise the Fifth Monthly Fee Application (.60); calculate fees and costs paid to Dentons to date (.20).
05/16/25	J.A. Moe, II	0.10	90.45	B160	Review the information necessary to complete the Fourth Monthly Fee Statement.
05/16/25	J.A. Moe, II	1.00	904.50	B160	Review the revised Second Interim Fee Application.
05/19/25	G. Miller	0.60	534.60	B160	Further prepare Ankura interim fee application.
05/21/25	J.A. Moe, II	0.30	271.35	B160	Review the proposed Fourth Monthly Fee Statement.
05/22/25	J.A. Moe, II	0.30	271.35	B160	Continued review the Fourth Monthly Fee Statement.
05/22/25	J.A. Moe, II	2.00	1,809.00	B160	Revising Second Interim Fee Application (1.70); continue to review information re personnel referred to in the Fee Application (.30).
05/22/25	G. Miller	0.10	89.10	B160	Call with J. Moe re Dentons interim fee application.
05/23/25	S. Schrag	0.10	96.30	B160	Confer with J. Moe re fee applications.
05/23/25	J.A. Moe, II	0.30	271.35	B160	Continue to revise the draft of the Second Interim Fee Application.
05/27/25	G. Miller	0.10	89.10	B160	Email T. Moyron re Ankura interim and monthly fee applications.
05/27/25	J.A. Moe, II	2.60	2,351.70	B160	Revising the Second Interim Fee Application.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/27/25	J.A. Moe, II	0.20	180.90	B160	Review the Fourth Monthly Fee Statement on the amounts to be identified and the calculations to be completed.
05/27/25	J.A. Moe, II	0.10	90.45	B160	Review the Order on procedures on the contents and filing of the Monthly Fee Statements and the Interim Fee Applications.
05/28/25	J.A. Moe, II	0.80	723.60	B160	Revise the Second Interim Fee Application, focusing on additional revisions to the descriptions of services.
05/28/25	J.A. Moe, II	1.00	904.50	B160	Review the Fourth Monthly Fee Statement.
05/28/25	K.M. Howard	0.40	156.60	B160	Telephone conference with J. Moe regarding Dentons Fourth Monthly Fee Application (.1); receive and review of billing statements for February 2025 (.2); prepare email to J. Moe regarding same (.1).
05/29/25	J.A. Moe, II	0.20	180.90	B160	Review and revise the Third Monthly Fee Statement.
05/29/25	J.A. Moe, II	0.10	90.45	B160	Review and reivse the Second Interim Fee Application.
05/29/25	J.A. Moe, II	0.30	271.35	B160	Research Amounts paid to Dentons through the First Interim Application (.1); prepare Chart for the Second Interim Application as to the amount paid Dentons (.3).
05/29/25	J.A. Moe, II	0.60	542.70	B160	Review the completed Fourth Monthly Fee Application (.40); review the revised and completed Statement (.20).
05/29/25	J.A. Moe, II	0.20	180.90	B160	Review the completed Fifth Monthly Fee Application, with amounts and calculations.
05/29/25	K.M. Howard	3.50	1,370.25	B160	Analysis of Dentons' billing statements for February 2025 (.7); prepare chart reflecting Compensation and Hours by Project Category (.6); prepare chart reflecting Compensation and Hours by Professional (.8); prepare Expense Chart (.1); prepare Summary Chart (.6); revise Dentons' Fourth Monthly Fee Statement for February 2025 (.6); prepare email to J. Moe regarding the Fourth Monthly Fee Statement (.1);

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/29/25	K.M. Howard	0.30	117.45	B160	Receive and review draft of Second Interim Fee Application (.2); telephone conference with J. Moe regarding same (.1).
05/30/25	K.M. Howard	5.10	1,996.65	B160	Revise Dentons Second Interim Fee Application (.8); analysis of Dentons' Monthly Fee Applications submitted for January 2025, February 2025 and March 2025 (1.4); prepare Schedule of Professional Fees - Compensation by Professional January 2025-March 2025 (1.6); prepare Compensation by Project Category for January 2025-March 2025 (1.1); prepare Expenses Chart (.2).
05/30/25	J.A. Moe, II	0.20	180.90	B160	Review and revise the Fourth and Fifth Monthly Fee Statements.
	Subtotal	48.10	36,492.30		

B190 - Other Contested Matters (excluding Assumption/Rejection Moti

Date	Timekeeper	Hours	Amount	Task	Narrative
05/06/25	T. Moyron	0.50	492.75	B190	Meeting with Togut firm, R. Cetrulo, et al., re Wells Fargo stipulation.
05/12/25	T. Moyron	0.50	492.75	B190	Call with R. Cetrulo, Togut Firm, et al., re Wells Fargo stipulation and Mid Penn Bank.
05/16/25	T. Moyron	0.10	98.55	B190	Analyze email from R. Millien re updated business model.
05/16/25	T. Moyron	0.50	492.75	B190	Meeting with R. Millien, D. Schumacher, S. Maizel et al., re demand for indemnity.
05/16/25	T. Moyron	0.20	197.10	B190	Correspondence regarding meeting with respect to demand for attorneys' fees.
05/21/25	T. Moyron	0.40	394.20	B190	Call with Togut firm, R. Cetrulo, et al., regarding stipulation and related matters (.2); correspondence with Togut firm, et al., re meeting (.2).
	Subtotal	2.20	2,168.10		

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B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/25	G. Miller	0.40	356.40	B300	Review and analyze claims filed against the Debtor.
05/02/25	G. Miller	0.70	623.70	B300	Review and analyze claims against Debtors (.4); Emails with T. Moyron re same (.3).
05/12/25	G. Miller	0.80	712.80	B300	Review Whiting proof of claim and related proposed buyout of lease.
05/13/25	G. Miller	0.20	178.20	B300	Emails with I. Lee and T. Tran re lease buyout.
	Subtotal	2.10	1,871.10		

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/25	S. Maizel	0.30	337.50	B320	Review and respond to emails re treatment of unsecured claims in plan, etc.
05/01/25	G. Miller	2.00	1,782.00	B320	Further prepare combined plan and disclosure statement.
05/01/25	T. Moyron	0.70	689.85	B320	Analyze plan.
05/02/25	G. Miller	0.40	356.40	B320	Email R. Cetrulo re background information needed for disclosure statement.
05/02/25	G. Miller	0.80	712.80	B320	Further prepare combined plan and disclosure statement.
05/02/25	T. Moyron	0.30	295.65	B320	Correspond with G. Miller, et al., re plan re GUCs.
05/07/25	G. Miller	1.10	980.10	B320	Further prepare combined plan and disclosure statement.
05/08/25	G. Miller	0.40	356.40	B320	Further prepare plan and disclosure statement.
05/12/25	C. Doherty, Jr.	0.20	177.30	B320	Review current draft of plan and disclosure statement motion and send updated draft to team.
05/12/25	G. Miller	0.40	356.40	B320	Prepare combined plan and disclosure statement.
05/17/25	G. Miller	0.30	267.30	B320	Review updated new business model.
05/19/25	S. Schrag	1.80	1,733.40	B320	Further prepare plan, including background section.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/21/25	S. Schrag	1.60	1,540.80	B320	Continue preparing description of proposed organizational restructuring under plan.
05/22/25	G. Miller	1.20	1,069.20	B320	Review and revise draft combined plan and disclosure statement.
05/23/25	G. Miller	2.60	2,316.60	B320	Further prepare combined plan and disclosure statement and email T. Moyron and S. Schrag re same.
05/23/25	S. Schrag	0.30	288.90	B320	Confer with G. Miller and T. Moyron regarding new clauses to Plan re corporate structure.
05/29/25	T. Moyron	0.20	197.10	B320	Call with S. Maizel regarding company structure, timing, and plan.
05/29/25	T. Moyron	0.40	394.20	B320	Analyze matters related to updated plan (.2); and prepare emails to G. Miller, et al., re same (.2).
05/30/25	G. Miller	2.80	2,494.80	B320	Review handshake agreement with DOJ (.4); Further prepare combined plan and disclosure statement (2.4).
	Subtotal	17.80	16,346.70		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/25	T. Moyron	2.20	2,168.10	MED/CMS	Zoom conference with R. Cetrulo, K. Manning, NR attorneys, I. Lee, HLB attorneys, etc. re negotiations with DOJ over CMS issues (.5); zoom conference with DOJ attorneys, NR attorneys, HLB attorneys, etc. re same (1.0); zoom conference with HLB attorneys, S. Maizel and I. Lee re same (.4); review and respond to emails re same (.3).
05/01/25	T. Moyron	0.20	197.10	MED/CMS	Correspond with I. Lee, et al., regarding DOJ questions on various payments.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/01/25	S. Maizel	2.20	2,475.00	MED/CMS	Zoom conference with R. Cetrulo, K. Manning, NR attorneys, I. Lee, HLB attorneys, etc. re negotiations with DOJ over CMS issues (.5); zoom conference with DOJ attorneys, NR attorneys, HLB attorneys, etc. re same (1.0); zoom conference with HLB attorneys, T. Moyron, and I. Lee re same (.4); review and respond to emails re same (.3).
05/01/25	G. Miller	1.00	891.00	MED/CMS	Further prepare Wound Pros settlement agreement.
05/05/25	T. Moyron	0.70	689.85	MED/CMS	Correspondence regarding stipulation and budget with DOJ, I. Lee, et al. (.6); call with A. Warner re same (.1).
05/05/25	G. Miller	0.30	267.30	MED/CMS	Prepare and file further extension of DOJ stipulation.
05/05/25	G. Medina	0.40	167.40	MED/CMS	Correspond with G. Miller, prepare and file Joint notice of extension of stipulation and agreed Order Re suspension of Medicare payments.
05/06/25	G. Medina	0.20	83.70	MED/CMS	Review request from T. Moyron and send file joint notice of extension stipulation.
05/06/25	T. Moyron	0.10	98.55	MED/CMS	Analyze emails from I. Lee, R. Cetrulo, et al. re rebranding re DOJ inquiry.
05/06/25	T. Moyron	0.10	98.55	MED/CMS	Prepare email to R. Cetrulo, et al., re filed stipulation.
05/06/25	T. Moyron	0.30	295.65	MED/CMS	Analyze A. Schandroli email (.1); analyze attached letter re settlement (.2).
05/06/25	S. Maizel	0.70	787.50	MED/CMS	Zoom conference with R. Millien, R. Cetrulo, K. Manning, I. Lee, etc. re DOJ negotiations (.5); telephone conference with T. Moyron re same (.2).
05/06/25	S. Maizel	0.40	450.00	MED/CMS	Review correspondence from Norton Rose to DOJ re settlement proposals (.3); review and respond to emails re same (.1).
05/07/25	S. Maizel	0.40	450.00	MED/CMS	Review and respond to email re CMS claims issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/08/25	T. Moyron	1.30	1,281.15	MED/CMS	Call with DOJ, HLB, NR. et al., including J. Bergin, D. Schumacher, B. Sun, S. Maizel re settlement and related matters, including DOJ's position (1.0); email with R. Cetrulo et al., to discuss DOJ's position (.3).
05/08/25	T. Moyron	0.30	295.65	MED/CMS	Meeting with S. Maizel regarding DOJ and related matters.
05/08/25	S. Maizel	1.20	1,350.00	MED/CMS	Zoom conference with DOJ, HLB attorneys, NR attorneys, etc., regarding pending negotiations over settlement (.7); zoom conference with T. Moyron, HLB, etc. re same (.3); review and respond to emails re same (.2) .
05/09/25	S. Maizel	2.40	2,700.00	MED/CMS	Zoom conference with Dr. Releford, R. Cetrulo, K. Manning, NR attorneys, HLB attorneys, T. Moyron, etc. re negotiations with DOJ over CMS issues (1.1); telephone conference with T. Moyron re same (.3); telephone conference with C. Oppenheim, HLB, re same (.1); review and respond to emails re same (.9).
05/09/25	T. Moyron	1.40	1,379.70	MED/CMS	Meeting with Companies, NR, HLB, and Dentons re DOJ re settlement and related matters (1.0) and correspondence thereafter (.4).
05/09/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails to DOJ re cash disbursements to biologics vendors.
05/10/25	T. Moyron	0.50	492.75	MED/CMS	Call with K. Manning re settlement matters.
05/12/25	S. Maizel	1.20	1,350.00	MED/CMS	Zoom conference with R. Cetrulo, etc. re negotiations with DOJ (.2); zoom conference with HLB attorneys, NR attorneys, and DOJ attorneys re same (.5); review and respond to emails re same (.5)
05/12/25	T. Moyron	0.50	492.75	MED/CMS	Call with HLB, including D. Shumacher, S. Maizel, et al., (.3) and continue call with group and B. Sun (.2).
05/12/25	T. Moyron	0.40	394.20	MED/CMS	Prepare email to G. Miller regarding extending date in stipulation (.1); analyze updated stipulation (.1) and email from A. Warner, et al., regarding sign off and filing (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/12/25	T. Moyron	0.40	394.20	MED/CMS	Analyze emails from D. Schumacher, et al., regarding DOJ communication and proposed settlement.
05/12/25	G. Medina	0.40	167.40	MED/CMS	Review, prepare and file thirteenth extension of stipulation and agreed order regarding suspension of Medicare payments To The Debtor by the United States Department of Health and Human Services.
05/12/25	G. Miller	0.40	356.40	MED/CMS	Prepare further extension of DOJ stipulation and email A. Warner re same.
05/13/25	S. Maizel	1.40	1,575.00	MED/CMS	Multiple telephone conferences with T. Moyron re negotiations with DOJ (.5); telephone conference with DOJ and T. Moyron re same (.1); telephone conference with B. Sun and T. Moyron re same (.3); telephone conference with R. Cetrulo and T. Moyron re same (.1); review and respond to emails re same (.4).
05/13/25	T. Moyron	1.40	1,379.70	MED/CMS	Daily huddle with R. Cetrulo, et al., regarding proposal to DOJ and related matters (.2); call with S. Maizel re same (.1); call with S. Maizel and B. Sun regarding same (.3); calls with R. Cetrulo and S. Maizel re same (.2); calls with J. Bergin re same (.2); correspondence with HLB, et al., regarding follow-up communication with DOJ (.3); prepare email to DOJ re handshake deal (.1).
05/14/25	S. Maizel	0.90	1,012.50	MED/CMS	Zoom with HLB attorneys and T. Moyron re negotiations with DOJ (.3); telephone conference with C. Oppenheim, HLB, re same (.1); telephone conference with T. Moyron, etc. re same (.2); review and respond to emails re same (.3).
05/14/25	T. Moyron	0.30	295.65	MED/CMS	Zoom with HLB attorneys and S. Maizel regarding DOJ negotiations.
05/14/25	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel regarding DOJ negotiations.
05/14/25	T. Moyron	0.30	295.65	MED/CMS	Analyze email from J. Bergin regarding settlement and amount of restitution (.1); correspondence with R. Cetrulo, et al., re same (.2).



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Date	Timekeeper	Hours	Amount	Task	Narrative
05/14/25	T. Moyron	0.10	98.55	MED/CMS	Analyze email from J. Bergin re handshake agreement and forward email to R. Cetrulo.
05/15/25	T. Moyron	0.50	492.75	MED/CMS	Meeting with R. Cetrulo, R. Millien, D. Schumacher, et al., regarding handshake agreement, DOJ communication and next steps, and related matters.
05/15/25	T. Moyron	0.10	98.55	MED/CMS	Call with S. Maizel re DOJ settlement.
05/16/25	T. Moyron	0.40	394.20	MED/CMS	Call with S. Maizel and A. Warner regarding indemnity request, budget and extended stipulation.
05/16/25	T. Moyron	0.40	394.20	MED/CMS	Meeting with A. Warner at DOJ, R. Cetrulo, I. Lee and S. Maizel re budget.
05/16/25	S. Maizel	0.70	787.50	MED/CMS	Telephone conference with HLB attorneys, etc. re indemnification issues (.5); telephone conference with T. Moyron re same (2).
05/16/25	S. Maizel	0.70	787.50	MED/CMS	Telephone conference with DOJ and HLB attorneys re budget issues (.3); telephone conference with T. Moyron re same (.4).
05/17/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails re correspondence from DOJ re negotiations.
05/19/25	C. Doherty, Jr.	0.10	88.65	MED/CMS	Review filing of joint extension of CMS deadlines.
05/19/25	G. Medina	0.40	167.40	MED/CMS	Correspond with G. Miller, prepare and file Joint notice of extension of stipulation and agreed Order Re suspension of Medicare payments.
05/19/25	G. Miller	0.60	534.60	MED/CMS	Prepare extension of DOJ stipulation.
05/19/25	T. Moyron	0.80	788.40	MED/CMS	Correspondence regarding stipulation with A. Warner, et al. (.3); correspond regarding budget (.3); further communications regarding filing and timing (.2).
05/20/25	S. Maizel	0.30	337.50	MED/CMS	Telephone conference with HLB attorneys, Ankura, etc. re negotiations with DOJ and CMS.
05/21/25	S. Maizel	0.40	450.00	MED/CMS	Telephone conference with HLB, etc. re negotiations with DOJ.
05/21/25	T. Moyron	0.50	492.75	MED/CMS	Meeting with N. Brown, HLB, S. Maizel et al. re corporate integrity agreement and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
05/22/25	T. Moyron	0.10	98.55	MED/CMS	Call with A. Warner re settlement and related matter.
05/23/25	T. Moyron	0.90	886.95	MED/CMS	Call with HBL, NR, including B. Sun, D. Schumacher, et al., regarding update on various meeting, status, and next steps (.8); call with S. Maizel re same (.1).
05/23/25	S. Maizel	0.70	787.50	MED/CMS	Zoom conference with Hooper Lundy and Norton Rose attorneys re negotiations with DOJ and HHS-OIG (.6); t/c with T. Moyron re same (.1).
05/28/25	T. Moyron	0.20	197.10	MED/CMS	Call with R. Millien regarding indemnity demand and status of DOJ response.
05/28/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails re negotiations with HHS OIG.
05/30/25	T. Moyron	0.10	98.55	MED/CMS	Analyze email from A. Warner and forward same to clients, NR, et al.
	Subtotal	32.60	33,073.20		

#### TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 1,125.00	20.60	\$ 23,175.00
T. Moyron	\$ 985.50	24.00	\$ 23,652.00
G. Miller	\$ 891.00	28.30	\$ 25,215.30
J.A. Moe, II	\$ 904.50	22.40	\$ 20,260.80
C. Doherty, Jr.	\$ 886.50	0.80	\$ 709.20
S. Schrag	\$ 963.00	7.50	\$ 7,222.50
G. Medina	\$ 418.50	2.10	\$ 878.85
K.M. Howard	\$ 391.50	<u>13.50</u>	<u>\$ 5,285.25</u>
Totals		119.20	\$ 106,398.90
Less Courtesy Discount			(\$5,000.00)
Fee Total			\$101,398.90

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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	14,355.90
B140	Relief from Stay/Adequate Protection Proceedings	2,091.60
B160	Fee Applications/Employment Applications	36,492.30
B190	Other Contested Matters (excluding Assumption/Rejection Moti	2,168.10
B300	Claims and Plan	1,871.10
B320	Plan and Disclosure Statement (including Business Plan)	16,346.70
MED/CMS	Medicare/CMS Issues	33,073.20
	Total Fees	\$106,398.90

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COMBINED TOTALS

Total Hours	119.20
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Fee Total, all Matters	\$ 101,398.90
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Invoice Total, all Matters	<u>\$ 101,398.90</u>
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