

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**SUMMARY COVERSHEET TO SECOND INTERIM FEE APPLICATION OF
DENTONS US LLP, ATTORNEYS FOR THE DEBTOR, FOR THE PERIOD FROM
JANUARY 1, 2025, THROUGH AND INCLUDING MARCH 31, 2025**

Name of Applicant:	Dentons US LLP	
Applicant's Role in Case:	Attorneys for Debtor	
Date of Employment Order Signed:	11/26/20/24 [Docket No. 69]	
	Beginning Date	End of Period
Time period covered by this Application:	1/01/25	3/31/25
Time period(s) covered by prior Application:	10/21/24	12/31/24
Total amounts awarded in prior Application:	\$774,837.70	
Total fees requested in this Application:	\$496,686.35	
Total professional fees requested in this Application:	\$486,546.35	
Total actual professional hours covered by this Application:	502.4	
Average hourly rate for professionals:	\$1,000.23	
Total paraprofessional fees requested in this Application:	\$10,170.00	
Total actual paraprofessional hours covered by this Application:	25.1	
Average hourly rate for paraprofessionals:	\$371.10	
Reimbursable expenses sought in this Application:	\$2,887.23	
Total to be paid to Priority Unsecured Creditors:	To be determined in connection with plan process	
Anticipated % dividend to Priority Unsecured Creditors:	To be determined in connection with plan process	
Total to be paid to General Unsecured Creditors:	To be determined in connection with plan process	



Name of Applicant:	Dentons US LLP
Anticipated % dividend to General Unsecured Creditors:	To be determined in connection with plan process
Date of Confirmation Hearing:	To be scheduled in connection with plan process
Indicate whether plan has been confirmed:	No

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In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**SECOND INTERIM FEE APPLICATION OF DENTONS US LLP,
ATTORNEYS FOR THE DEBTOR, FOR INTERIM ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
FROM JANUARY 1, 2025, THROUGH AND INCLUDING MARCH 31, 2025**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN FOURTEEN DAYS FROM THE DATE THIS APPLICATION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN FOURTEEN DAYS FROM THE DATE THIS APPLICATION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Dentons US LLP (“Dentons”), counsel for Global Wound Care Medical Group, a Professional Corporation, as debtor and debtor-in-possession (the “Debtor”) in the above-captioned chapter 11 case (the “Case”), hereby files this second application (the “Application”) for interim allowance of compensation for professional services performed by Dentons during the period commencing January 1, 2025, through and including March 31, 2025 (the “Compensation Period”) in the amount of \$496,686.35, and for reimbursement of its actual and necessary expenses incurred for the Compensation Period in the amount of \$2,887.23. Dentons has filed three monthly fee statements during the Compensation Period as follows: (i) on March 30, 2025, Dentons filed its *Third Monthly Fee Statement of Dentons US LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtor for the Period from*

January 1, 2025 Through January 31, 2025 [Docket No. 185] (the “Third Monthly Fee Statement”) seeking fees of \$150,331.50 and expenses of \$150.00, pursuant to which Dentons has been paid \$120,264.84 in fees and \$150.00 in expenses, leaving a balance due of \$30,066.66; (ii) on July 2, 2025, Dentons filed its *Fourth Monthly Fee Statement of Dentons US LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtor for the Period from February 1, 2025 Through February 28, 2025* [Docket No. 223] (the “Fourth Monthly Fee Statement”), seeking an award of \$183,432.35 in fees and \$0.00 in expenses, pursuant to which Dentons has been paid \$146,745.88, leaving a balance due of \$36,686.47; and (iii) on July 3, 2025, Dentons filed its *Fifth Monthly Fee Statement of Dentons US LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtor for the Period from March 1, 2025 Through March 31, 2025* [Docket No. 224] (the “Fifth Monthly Fee Statement”), seeking an award of \$162,922.95 in fees and \$2,737.23 in expenses, pursuant to which Dentons has been paid \$130,338.36 in fees and \$2,737.23 in expenses, leaving a balance due of \$32,584.569. In this Application, Dentons seeks a total award of \$496,686.80 in fees and \$2,887.23 in expenses for the Compensation Period.

Preliminary Statement

1. During the Compensation Period, Dentons was heavily engaged in the ongoing negotiations with the Fraud Section and the Corporate/Financial Litigation Section of the Civil Division of the US Department of Justice (the “DOJ”), and the US Attorney’s Office for the Eastern District of California, and their clients, the Centers for Medicare and Medicaid Services and the US Department of Health and Human Services, and its Office of Inspector General (collectively, the “United States”), regarding, among, other things: (i) the negotiation of a settlement among the Debtor, other non-debtor entities, including Wound Pro Management Inc.,

the Debtor's management services organization (the "MSO"), and the United States over allegations related to the Federal False Claims Act, which led to a payment suspension, which was the catalyst for the commencement of the bankruptcy case; (ii) the continuation of the stipulation among the Debtor, the MSO, affiliated entities, and the United States, as set forth in the *Joint Notices of Extension of Stipulation and Agreed Order Regarding Suspension of Medicare Payments to the Debtor by the United States Department of Health and Human Services*, filed on January 31, 2025, February 14, 2025, and March 14, 2025 [Docket Nos. 112, 119, 141] (the "Stipulation") that ensures that the Debtor has continuity of payments from the Medicare Program to the Debtor for 75% of the services it renders to Medicare beneficiaries so it can continue to provide the essential wound care treatments to its patients; (iii) ensuring the Debtor complies with the myriad of obligations imposed on the Debtor by the Stipulation, including weekly reporting obligations; and (iv) complying with obligations in the Case.

2. Throughout the Compensation Period, Dentons, along with attorneys from Hooper, Lundy & Bookman ("HLB"), negotiated regularly and intensely with attorneys for the United States, and made significant progress on a global resolution, which the Debtor believes can be achieved within a reasonable period. Dentons also commenced work in earnest on preparing a Plan of Reorganization and Disclosure Statement.

3. The professional services performed and expenses incurred by Dentons during the Compensation Period were actual and necessary to preserve and protect the value of the Debtor's estate and minimize any negative impact on the restructuring.

4. Given the circumstances of this Case, Dentons' charges for professional services performed and expenses incurred are reasonable and appropriate under applicable standards.

Dentons respectfully requests that the Court grant this Application and allow interim compensation for professional services performed and reimbursement for expenses incurred.

Relief Requested

5. This Application has been prepared in accordance with sections 330(a) and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Local Rules”), the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “Fee Guidelines”) and the *Order Granting Debtor’s Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (Docket No. 68) (the “Interim Compensation Procedures Order”). The Debtor requests approval of this Application.

6. A proposed form of order granting the relief requested herein is attached hereto as **Exhibit “A”** (the “Proposed Order”).

Jurisdiction

7. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

8. On October 21, 2024, (the “Petition Date”), the Debtor commenced the Case 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 properties as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

9. No trustee or examiner has been appointed in this Case.

10. The Debtor is a professional corporation incorporated in 2023 in California, which is 100% owned by Owen B. Ellington, M.D (“Dr. Ellington”). The Debtor was established to provide continuity of care for the patients of another medical group that used a similar business name as the Debtor. The Debtor is managed and supported by the MSO, a leader in wound care management and standardization that is an accredited supplier of durable medical equipment, prosthetics, orthotics, supplies and biologics. Additional information regarding the Debtor’s business, capital structure, and the circumstances leading to the commencement of this Case is set forth in the *Declaration of Ralph Cetrulo in Support of Chapter 11 Petition and First Day Motions* [Docket No. 8] (the “First Day Declaration”).

Debtor’s Retention of Dentons

11. On October 25, 2024, the Debtor filed the *Debtor’s 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 “Retention Application”). On November 26, 2024, the Court entered the *Order Approving Debtor’s 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. 69] (the “Retention Order”).

Summary of Professional Compensation and Reimbursement of Expenses Requested

12. Dentons seeks (i) interim allowance of compensation for professional services performed during the Compensation Period in the amount of \$496,686.35, and (ii) reimbursement of expenses incurred in connection with the rendition of such services in the amount of \$2,887.23.

During the Compensation Period, Dentons attorneys and paraprofessionals expended a total of 527.5 hours in connection with the necessary services performed.

13. There is no agreement or understanding between Dentons and any other person, other than members of the firm, for the sharing of compensation to be received for services rendered in this Case. During the Compensation Period, Dentons received payment from the Debtor in the amount of \$120,414.84 in accordance with the Third Monthly Fee Statement. Subsequent to the Compensation Period, Dentons received payments from the Debtor in the amounts of \$146,745.88 in accordance with the Fourth Monthly Fee Statement and \$133,075/59 in accordance with the Fifth Monthly Fee Statement.

14. As already noted, Dentons has filed three Monthly Fee Statements, on March 30, 2025 [Docket No. 185], on July 2, 2025 [Docket No. 223] and on July 3, 2025 [Docket No. 224], with the fees and expenses sought and amounts paid to date shown in the chart below:

Monthly Statements

	Fees Requested	Fees Paid	Expenses Requested	Expenses Paid
Third Statement Jan. 1-31, 2025	\$150,331.50	\$120,264.84	\$150.00	\$150.00
Fourth Statement Feb. 1-28, 2025	\$183,432.35	\$146,745.88	\$0.00	N/A
Fifth Statement March 1-31, 2025	\$162,922.95	\$130,338.36	\$2,737.23	\$2,737.23

15. As set forth in the Retention Application, prior to the Petition Date, the Debtor paid a retainer to Dentons to be held for postpetition fees and expenses (the “Prepetition Retainer”). Based on a reconciliation of all charges and expenses through the date of this Application, the Prepetition Retainer held by Dentons as of the date of this Application is \$165,000.00.

16. The fees charged by Dentons in this Case are billed in accordance with Dentons’ existing billing rates and procedures in effect during the Compensation Period. The rates Dentons

charges for the services rendered by its professionals and paraprofessionals in this Case are no greater than the rates Dentons charges for professional and paraprofessional services rendered in comparable bankruptcy and non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and non-bankruptcy matters in a competitive national legal market.

Supporting Documents

17. Attached hereto as **Exhibit “B”** is the *Certification of Samuel R. Maizel*, a partner of Dentons (the “Maizel Certification”) regarding Dentons’ compliance with the Fee Guidelines.

18. Attached hereto as **Exhibit “C”** is a schedule of all Dentons’ attorneys and paraprofessionals who have performed services for the Debtor during the Compensation Period, the capacities in which each individual is employed by Dentons, the department in which each individual practices, the hourly billing rate charged by Dentons for services performed by such individuals, the year in which each attorney was first licensed to practice law, where applicable, and the aggregate number of hours expended in this matter and fees billed in connection therewith (the “Schedule of Professional Fees”).

19. Dentons maintains computerized records of the time spent by all Dentons’ attorneys and paraprofessionals in connection with the representation of the Debtor in this Case. Attached hereto as **Exhibit “D”** is a chart on fees and expenses requested and paid in response to the Monthly Fee Statements and Dentons’ invoices during the Compensation Period using task codes hereinafter described in the format specified by the Fee Guidelines (the “Time Records”).

20. Attached hereto as **Exhibit “E”** is an itemized schedule of the expenses for which Dentons is seeking reimbursement and a summary specifying the categories of expenses included in the schedule and the total amount for each such expense category (the “Expenses”).

21. Attached hereto as **Exhibit “F”** is a summary and comparison of the aggregate blended hourly rates billed by Dentons’ timekeepers to non-bankruptcy matters during the prior twelve-month period ending December 31, 2024, and the blended hourly rates billed to the Debtor during the Compensation Period (the “Blended Rate Comparison Chart”).

22. Dentons discussed its rates, fees, and staffing with the Debtor prior to the commencement of this Case and has continued to discuss staffing and fees with the Debtor throughout this Case. Neither the Court nor the Office of the United States Trustee (the “UST”) required a budget.

23. Attorneys and paraprofessionals assigned to this matter were necessary to assist with the prosecution of the Debtor’s Case, preservation of the Debtor’s assets, and other matters described herein. Neither the Court nor the UST required a Staffing Plan.

24. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Compensation Period, but were not processed prior to the preparation of this Application, Dentons reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application to the Court.

Summary of Services Performed by Dentons During the Compensation Period

25. During the Compensation Period, Dentons devoted substantial resources and rendered significant professional services to ensure that, among other things, the Debtor continued to operate its business while engaging in advanced settlement discussions with key stakeholders. The following is a summary of the significant professional services, among others, rendered by Dentons during the Compensation Period, organized in accordance with Dentons’ internal time-tracking system, and broken down by task codes:

- a. Case Administration (Task Code B110)
Fees: \$80,401.95; Total Hours: 81.80

During the Compensation Period, Dentons (i) participated in conferences regarding (a) the retention of the Debtor's Chief Restructuring Officer ("CRO"), (b) a potential settlement with the DOJ, (c) the preparation of a motion to retain ordinary course professionals (the "OCP Motion"), and (d) garnishment issues; (ii) participated in a conference call with the UST concerning the *Debtor's Emergency Motion for Entry of an Order Authorizing Ankura Consulting Group, LLC to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024*, filed December 19, 2024 [Docket No. 88] (the "CRO Motion"), which the Court granted on January 14, 2025 [Docket No. 104]; (iii) participated in multiple telephone calls with the CRO regarding the Debtor's budget and various wound care issues; (iv) participated in conference calls with Ankura Consulting Group, LLC ("Ankura") on compensation issues; (v) participated in team meetings with the DOJ, alongside HLB and Ankura, regarding possible settlement with the DOJ; (vi) participated in telephone calls and written correspondence with representatives of Wells Fargo Bank regarding the Debtor's banking relationship; (vii) participated in video conferences with attorneys at Togut, Segal & Segal, LLP (the "Togut Law Firm"), the Debtor's Chief Financial Officer (the "CFO"), and CRO regarding the Debtor's banking relationship with Wells Fargo Bank; (viii) participated in video conferences with the Debtor's former in-house counsel and counsel for Dr. Christopher Otiko regarding issues relating to Dr. Otiko; and (ix) participated in a video conference with Dr. Releford's counsel, alongside HLB, regarding various pending issues.

During the Compensation Period, Dentons (i) corresponded with Verita Global (formerly known as Kurtzman Carson Consultants) regarding (a) the Creditor Matrix List, (b) various updated *Debtor's Master Service Lists* [Docket Nos. 108, 118, and 132], and (c) the *Motion of Debtor for Entry of an Order (I) Establishing Deadlines and Procedures for Filing Proofs of*

Claim; (II) Approving Form and Manner of Notice Thereof; and (III) Granting Related Relief, filed February 7, 2025 [Docket No. 115] (the “Bar Date Motion”), which the Court granted [Docket No. 138] (the “Bar Date Order”); (ii) corresponded with the Debtor’s Chief Human Resources Officer regarding employee-related questions; (iii) reviewed and corresponded regarding credentialing issues, as well as Medicare coverage for substitute skin grafts; and (iv) reviewed and corresponded with the Patient Care Ombudsman on the (a) the *Report(s) of Suzanne Richards as Patient Care Ombudsman of the Debtor* filed January 14, 2025 and March 3, 2025 [Docket Nos. 105, 131], and (b) the Patient Care Ombudsman’s application for fees and expenses.

In addition, during the Compensation Period, Dentons (i) assisted in the preparation and filing of *Debtor-in-Possession Monthly Operating Reports* on January 6, 2025 [Docket No. 97], March 21, 2025 [Docket Nos. 148, 149], and March 28, 2025 [Docket No. 153]; (ii) analyzed the Debtor’s “weekly reports,” CRO employment issues, budget issues, tax obligations, and employee matters; (iii) analyzed issues relating to Wells Fargo Bank and whether to continue the Debtor’s relationship with Wells Fargo, as well as issues related to the Debtor’s continued access to bank accounts and other banking relationship issues; and (iv) conducted UCC searches in all states in which the Debtor is licensed.

b. Fee Applications/Employment Applications (Task Code B160)
Fees: \$62,451.45; Total Hours: 74.70

On October 25, 2024, Dentons filed the Retention Application, and the Court entered the Retention Order on November 26, 2024.

Concurrently with filing its Retention Application, Dentons prepared and filed *Debtor’s Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 26], and the Court entered the Interim Compensation Procedures Order [Docket No. 68] thereon on November 26, 2024.

In accordance with the Intern Compensation Procedures Order, during the Compensation Period, Dentons filed on February 28, 2025, the *First Interim Fee Application of Dentons US LLP, Attorneys for the Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 21, 2024 Through and Including December 31, 2024* [Docket No. 130], and the Court entered its *Order Allowing Interim Compensation and Reimbursement of Expenses* on April 2, 2025 [Docket No. 155].

During the Compensation Period, Dentons also prepared and filed the *Third Monthly Fee Statement* [Docket No. 185], and commenced preparation of the *Fourth Monthly Fee Statement* [Docket No. 223] and the *Fifth Monthly Fee Statement* [Docket No. 224].

During the Compensation Period, Dentons conducted conferences on the engagement letter with Ankura; participated in conferences regarding the CRO Motion and the Ankura retention order; reviewed monthly fee statements for Ankura; and, helped prepare and reviewed the *First and Second Applications for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial and Restructuring Advisor and for the Provision of Isaac Lee as Chief Restructuring Officer for Ankura Consulting Group, LLC, Financial Advisor*, both filed on February 22, 2025 [Docket Nos. 123, 124].

- c. Other Contested Matters (Task Code B190)
Fees: \$591.30; Total Hours: .60

During the Compensation Period, Dentons had meetings and correspondence with the DOJ regarding, among other things, the Debtor's relationship with Wells Fargo Bank; corresponded with the CRO regarding the Debtor's Wells Fargo accounts and the potential effects on deposits and collections of receivables upon transfer of accounts to a different bank.

- d. Operations (Task Code B200)
Fees: \$1,256.40; Total Hours: 1.20

During the Compensation Period, Dentons engaged in a Zoom conference with the Debtor and Ankura, and engaged in a telephone calls with the Togut Law Firm, the CRO, the Debtor and others, regarding the Debtor's cash management system and the Wells Fargo account; and met with the Debtor regarding corporate governance matters.

- e. Tax Issues (Task Code B240)
Fees: \$681.30; Total Hours: .50

During the Compensation Period, Dentons participated in telephone calls with representatives of the Debtor on various tax related issues, including deductibility of certain payments; and had an exchange of E-Mails with officials from the State of Washington, on taxes allegedly due to Washington.

- f. Board of Directors Matters (Task Code B260)
Fees: \$745.65; Total Hours: .70

During the Compensation Period, Dentons corresponded on corporate governance matters.

- g. Claims and Plan (Task Code B300)
Fees: \$980.10; Total Hours: 1.10

During the Compensation Period, Dentons continued to work on a settlement agreement with the MSO.

- h. Claims Administration and Objections (Task Code B310)
Fees: \$29,145.60; Total Hours: 33.00

During the Compensation Period, Dentons: prepared and filed the Bar Date Motion; prepared the proposed Bar Date Order; took the steps necessary to do a "publication notice" of the *Notice of Deadlines for Filing Proofs of Claim* (the "Notice of Bar Date") [see Docket No. 138, pp. 15-20]; corresponded with various parties regarding the Notice of Bar Date; and attended to matters regarding claims.

- i. Plan and Disclosure Statement (including Business Plan) (Task Code B320)
Fees: \$98,374.95; Total Hours: 104.90

During the Compensation Period, Dentons analyzed the Debtor's corporate structure and a potential plan of reorganization, outlining a proposed plan; conferred with the Debtor's CFO and General Counsel on restructuring; reviewed the updated "business model" and potential plan provisions regarding treatment of HHS claims; participated in a telephone conference with MTS regarding possible purchase of assets; analyzed and revised proposed term sheets; continued review of revised term sheets regarding terms of a plan as provided to the DOJ; conducted research on, prepared and filed on February 18, 2025, the *Debtor's Motion for Entry of an Order Extending Its Exclusive Period for the Filing of a Chapter 11 Plan Pursuant to § 1121(d) of the Bankruptcy Code* [Docket No. 120] (the "Exclusivity Motion"), in response to which on March 18, 2025, the Court entered its *Order Granting Debtor's Motion for Entry of an Order Extending Its Exclusive Period for the Filing of a Chapter 11 Plan* [Docket No. 144]; analyzed an indemnification issue in connection with Dr. Releford, reviewing and responding to E-Mails regarding preparation of an undertaking related to indemnification; analyzed options regarding a restructuring plan; researched the sale of a for-profit medical corporation as part of a plan of reorganization or, in the alternative, a 363 sale; analyzed feasibility and settlement issues in regard to preparing a plan; conducted internal conferences regarding treatment of claims and implementation of a plan of reorganization; and commenced in earnest drafting of a combined plan and disclosure statement.

- j. Employment (Task Code EMP)
Fees: \$5,327.10; Total Hours: 5.10

During the Compensation Period, Dentons reviewed HLB's letter to the DOJ regarding contractor issues, including review and analysis of the case of *Omni Healthcare vs. MD Spine Solutions*, preparing a detailed analysis of that case; conducted internal conferences regarding contractor issues; and conducted internal conferences regarding employment-related issues.

- k. Insurance (Task Code INS)
Fees: \$89.10; Total Hours: .10

During the Compensation Period, Dentons reviewed correspondence regarding the non-renewal of insurance.

- l. Medicare/CMS Issues (Task Code MED/CMS)
Fees: \$232,641.45; Total Hours: 223.80

During the Compensation Period, Dentons (i) participated in continued substantial negotiations, alongside HLB and Ankura, with attorneys from the Fraud Section and Commercial Litigation Branch of the US Department of Justice, as well as the US Attorney's Office for the Eastern District of California, regarding potential settlement of the allegations that led to the suspension of Medicare payments otherwise owed to the Debtor, which had compelled the commencement of this Case; (ii) participated in continued regular and lengthy discussions, alongside HLB and Ankura, with the Debtor's General Counsel, CFO and CRO, regarding potential terms of a potential settlement, the tax implications thereof, the Debtor's ability to fund any potential settlement, and various related issues, including various payment restrictions and other conditions imposed on the Debtor by the stipulations the Debtor entered into with the United States; and (iii) participated in continued regular discussions with attorneys representing other parties to the potential settlement regarding their participation in and/or impact on the Debtor's efforts to settle with the United States.

During the Compensation Period, Dentons also commenced drafting a combined disclosure statement and plan, which necessarily will incorporate provisions from the proposed settlement agreement with the United States.

26. In connection with the foregoing, Dentons prepared, on behalf of the Debtor, an array of motions, applications, orders, notices, responses, and other papers in support of positions taken by the Debtor and in compliance with applicable law.

27. The foregoing professional services were necessary and appropriate to the administration of this Case. The professional services performed by Dentons were in the best interests of the Debtor and its stakeholders. Compensation for such services is commensurate with the complexity, importance, and nature of the issues and tasks that were involved in this Case. All of Dentons' professional services were performed skillfully and efficiently.

28. The professional services performed by Dentons' partners, counsel, associates, and paraprofessionals were rendered by the restructuring, corporate, litigation, tax and employment law departments in several of Dentons' offices. Dentons has a preeminent restructuring practice and enjoys a national reputation for its expertise in financial reorganizations and restructurings of distressed healthcare industry entities.

29. The professional services performed by Dentons on behalf of the Debtor during the Compensation Period required an aggregate expenditure of 527.5 hours by Dentons' partners, counsel, associates and paraprofessionals. Of the aggregate time expended, 432.4 recorded hours were expended by partners and counsel of Dentons, 70.0 recorded hours were expended by associates, and 25.1 recorded hours were expended by paraprofessionals.

30. During the Compensation Period, Dentons billed the Debtor for time expended by attorneys based on hourly rates ranging from \$396.00 to \$1,795.50 per hour for attorneys. Allowance of compensation in the amount requested would result in a blended hourly billing rate for Dentons attorneys in this Application of approximately \$1,000.23 (based on 502.4 recorded hours for attorneys at Dentons' billing rates in effect at the time of the performance of services).

Actual and Necessary Disbursements of Dentons

31. As set forth in **Exhibit "E"** attached hereto, Dentons has disbursed \$2,887.23 as expenses incurred in providing professional services during the Compensation Period. These expenses are reasonable and necessary and were essential to the overall administration of this Case.

32. With respect to legal research, Dentons does not charge more than the actual cost. This category of expense does not exceed the maximum rate set by the Fee Guidelines or the Bankruptcy Local Rules. These charges are intended to cover Dentons' direct operating costs, which costs are not incorporated into Dentons' hourly billing rates. Only clients who actually use services of the types set forth in **Exhibit "E"** are separately charged for such services. The effect of including such expenses as part of the hourly billing rates would impose that cost upon clients who do not require those facilities and services.

33. On certain occasions, overnight delivery of documents and other materials was required as a result of circumstances necessitating the use of such express services. These disbursements are not included in Dentons' overhead for the purpose of setting billing rates.

34. Dentons has made every effort to minimize its disbursements in this Case. The actual expenses incurred in providing professional services were those that were necessary, reasonable, and justified under the circumstances to serve the needs of the Debtor and its estate and creditors.

Requested Compensation Should Be Allowed

35. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330(a)(1) of the Bankruptcy Code provides that a Court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses."

36. The Court should consider six factors found in section 330(a)(3) of the Bankruptcy Code when awarding compensation to professionals. *See In re Crager*, 691 F.3d 671, 676 (5th Cir. 2012). Specifically, under section 330 of the Bankruptcy Code, courts "shall consider the nature,

the extent, and the value of such services, taking into account all relevant factors,” including:

- a. the time spent on such services;
- b. the rates charged for such services;
- c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

37. Dentons submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Application were necessary for and beneficial to the preservation and maximization of value for all stakeholders and to the orderly administration of the Debtor’s estate. The compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Debtor, its estate, and all parties in interest.

38. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the issues and tasks involved. Not only were Dentons’ professional services performed skillfully and efficiently, but whenever possible Dentons sought to minimize the cost of its services to the Debtor by utilizing junior attorneys and paraprofessionals to handle the more routine aspects of case administration. In addition, the same Dentons attorneys were utilized for similar tasks in this Case to minimize the fees associated with intra-Dentons communication and familiarization with the Case. As described above, the complexity of this Case

required the use of specialists in Medicare, litigation, labor and employee benefits, and other areas, to achieve the progress the Debtor has reached thus far in this Case.

39. In sum, the services rendered by Dentons were necessary and beneficial to the Debtor's estate and were consistently performed in a timely manner commensurate with the types of issues involved in this Case. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought in this Application is warranted.

Notice

40. Pursuant to the Interim Procedures Compensation Order, notice of this Application 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.

The Debtor respectfully submits that no further notice is required.

Conclusion

41. Dentons respectfully requests that the Court (i) award interim allowance of fees in the amount of \$496,686.80, representing 100% of fees incurred during the Compensation Period, and reimbursement of expenses in the amount of \$2,887.23, representing 100% of actual and necessary expenses incurred during the Compensation Period, (ii) that such allowance be without prejudice to Dentons' right to seek additional compensation for services performed and expenses incurred during the Compensation Period in the event such fees and expenses were not processed at the time of this Application, and (iii) grant such other and further relief as is proper and just.

Dated: September 4, 2025
Houston, Texas

/s/ Casey S. Doherty, Jr.

Casey S. 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
 taniamoyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

Certificate of Service

I hereby certify that on September 4, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey S. Doherty, Jr.

Exhibit A

Proposed Order

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

The Court has considered the *Second Interim Application of Dentons US LLP* (the “Applicant”), *Attorneys for Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2025, Through and Including March 31, 2025* (the “Application”) filed by Dentons US LLP (the “Applicant”). The Court orders:

1. The Applicant is allowed interim compensation of \$496,686.35 and reimbursement of expenses in the amount of \$2,887.23, a total of \$499,573.58, for the period set forth in the Application.
2. The Debtor is authorized to disburse any unpaid amounts allowed by paragraph 1 of this order to the Applicant.

Dated: _____, 2025
Houston, Texas

CHRISTOPHER LOPEZ
UNITED STATES BANKRUPTCY JUDGE

Exhibit B

Certification of Counsel

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**CERTIFICATION OF SAMUEL R. MAIZEL IN SUPPORT OF SECOND
INTERIM FEE APPLICATION OF DENTONS US LLP AS ATTORNEYS
FOR THE DEBTOR, FOR ALLOWANCE OF COMPENSATION FOR
PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF
ACTUAL AND NECESSARY EXPENSES INCURRED FROM
JANUARY 1, 2025, THROUGH AND INCLUDING MARCH 31, 2025**

I, Samuel R Maizel, hereby certify that:

1. I am a Partner of the firm, Dentons US LLP (“Dentons”). Dentons maintains offices at, among other places, 1300 Post Oak Boulevard, Suite 650, Houston, Texas 77056, and 601 South Figueroa Street, Suite 2500, Los Angeles, California 90017-5704.

2. This certification (“Certification”) is made in connection with the concurrently filed *Second Interim Fee Application of Dentons US LLP, Attorneys for Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 1, 2025, Through and Including March 31, 2025* (the “Application”), for compensation and reimbursement of expenses for the period commencing January 1, 2025, through and including March 31, 2025 (the “Compensation Period”). I have reviewed the Application and hereby certify that the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and Fee Guidelines.

3. I certify that Dentons has complied with provisions of the *Order Granting Motion Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 68] requiring it to provide the Debtor and the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) with monthly statements of Dentons’ fees and disbursements accrued during the Compensation Period.

4. Dentons discussed its rates, fees, and staffing with the Debtor at the outset of this case and has continued to discuss staffing and fees with the Debtor throughout this case. Attorneys and paraprofessionals assigned to this matter were necessary to assist with the prosecution of the Debtor’s chapter 11 case, preservation of the Debtor’s assets, and other matters described herein.

5. In accordance with the Fee Guidelines, Dentons responds to the questions identified therein as follows:

Question 1: Did Dentons agree to any variation from, or alternatives to, Dentons’ standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the Compensation Period? If so, please explain.

Answer: Yes, Dentons reduced its standard hourly rates by approximately ten percent.

Question 2: If the fees sought in the Application as compared to the fees budgeted for the time period covered by the Application are higher by 10% or more, did Dentons discuss the reasons for the variation with the client?

Answer: Neither the Office of the U.S. Trustee nor the Bankruptcy Court required a budget.

Question 3: Have any of the professionals included in the Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No.

Question 4: Does the Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices. If so, please quantify by hours and fees.

Answer: No.

Question 5: Does the Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No descriptions were redacted.

Question 6: Does the Application include any rate increases since Dentons' retention in these cases? If so, did the client review and approve those rate increases in advance? Did the client agree when retaining the law firm to accept all future rate increases?

Answer: No. Dentons' rates have not increased since Dentons was retained in these cases.

Dated: September 4, 2025
Los Angeles, California

/s/ Samuel R. Maizel

Samuel R. Maizel
Dentons US LLP

Exhibit C

Schedules of Professional Fees

COMPENSATION BY PROFESSIONAL
JANUARY 1, 2025, THROUGH AND INCLUDING MARCH 31, 2025

The attorneys who rendered professional services in this chapter 11 case during the Compensation Period are:

NAME OF PROFESSIONAL	POSITION	DEPT.	YEAR ADMITTED ¹	HOURLY BILLING RATE ²	TOTAL BILLED HOURS	TOTAL COMPENSATION
Van C. Durrer, II	Partner	RIB ³	1993	\$1,795.50	.50	\$897.75
John L. Harrington	Partner	RIB	1987	\$1,521.00	2.90	\$4,410.90
Samuel R. Maizel	Partner	RIB	1997	\$1,125.00	147.60	\$166,050.00
Sam J. Alberts	Partner	RIB	1992	\$1,107.00	.50	\$553.50
Sandra R. McCandless	Partner	E&L ⁴	1973	\$1,039.50	4.80	\$4,989.60
Tania M. Moyron	Partner	RIB	2005	\$985.50	170.90	\$168,421.95
John A. Moe, II	Partner	RIB	1975	\$904.50	23.70	\$21,436.65
Geoffrey M. Miller	Partner	RIB	2012	\$891.00	66.00	\$58,806.00
R. Matthew Garms	Partner	CTPC ⁵	1999	\$688.50	2.40	\$1,652.40
Casey Doherty, Jr.	Counsel	RIB	2011	\$886.50	13.10	\$11,613.15
Sarah M. Schrag	Associate	RIB	2016	\$963.00	53.70	\$51,713.10
David F. Cook	Associate	RIB	2017	\$855.00	1.20	\$1,026.00
Henry Thomas	Associate	RIB	2023	\$769.50	13.20	\$10,157.40
Samantha Ruben	Associate	RIB	2019	\$751.50	.10	\$75.15
Jacob Margolies	Associate	CL	2021	\$396.00	1.80	\$712.80
Sub-Total					502.40	\$502,516.35
Discounted Fees⁶						(\$16,000.00)
Total					502.40	\$486,516.35

¹ * - Not yet admitted.

² ** - Non-working travel was written off.

³ Restructuring, Insolvency and Bankruptcy.

⁴ Employment and Labor.

⁵ Corporate, Tax, Private Client.

⁶ Dentons discounted the fees by \$16,000 relating to work performed in Category of Service B160.

The paraprofessionals who rendered professional services in this chapter 11 case during the Compensation Period are:

NAME OF PARAPROFESSIONAL	POSITION	DEPT.	HOURLY BILLING RATE	TOTAL BILLED HOURS	TOTAL COMPENSATION
Dianne Nichols	Senior Paralegal	RIB	\$423.00	.70	\$296.10
George L. Medina	Senior Paralegal	RIB	\$418.50	11.90	\$4,980.15
Kathryn Howard	Senior Paralegal	RIB	\$391.50	12.50	\$4,893.75
Total				25.10	\$10,170.00

The total fees for the Compensation Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners	\$1,018.89	419.30	\$427,218.75
Counsel	\$886.50	13.10	\$11,613.15
Associates	\$909.78	70.00	\$63,684.45
Paraprofessionals	\$405.18	25.10	\$10,170.00
Blended Attorney Rate	\$1,000.23	502.40	\$502,516.35
Blended Rate for All Timekeepers	\$971.92	527.50	\$512,686.35

COMPENSATION BY PROJECT CATEGORY
JANUARY 1, 2025, THROUGH AND INCLUDING MARCH 31, 2025

TASK CODE	PROJECT CATEGORY	TOTAL BILLED HOURS	TOTAL COMPENSATION
B110	Case Administration	81.80	\$80,401.95
B160	Fee Applications/Employment Applications	74.70	\$62,451.45
B190	Other Contested Matters (excluding assumption/rejection motions)	.60	\$591.30
B200	Operations	1.20	\$1,256.40
B240	Tax Issues	.50	\$681.30
B260	Board of Directors Matters	.70	\$745.65
B300	Claims and Plan	1.10	\$980.10
B310	Claims Administration and Objections	33.00	\$29,145.60
B320	Plan and Disclosure Statement (including Business Plan)	104.90	\$98,374.95
EMP	Employment	5.10	\$5,327.10
INS	Insurance	.10	\$89.10
MED/CMS	Medicare/CMS Issues	223.80	\$232,641.45
SUBTOTAL		527.50	\$512,686.35
DISCOUNTED FEES⁷			(\$16,000.00)
TOTAL		527.50	\$496,686.35

⁷ Dentons discounted the fees by \$16,000 relating to work performed in Category of Service B160.

Exhibit D

Time Records

SUMMARY OF MONTHLY FEE STATEMENTS FOR SECOND INTERIM FEE APPLICATION

Second Interim Fee Application								
Date Served	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested
		Fees	Expenses	Fees (@80%)	Fees (@100%)	Fees (@80%)	Expenses (@100%)	Fees (@20%)
3/30/2025	1/01/25 – 1/31/25	\$150,331.50	\$150.00	\$120,264.84	\$150,331.50	\$120,264.84	\$150.00	\$30,066.66
7/2/2025	2/01/25 – 2/28/25	\$183,432.35	\$0.00	\$146,745.88	\$183,432.35	\$146,745.88	\$0.00	\$36,686.47
7/3/2025	3/01/25 – 3/31/25	\$162,922.95	\$2,737.23	\$130,338.36	\$162,922.95	\$130,338.36	\$2,737.23	\$32,584.59
Totals		\$496,686.80	\$2,887.23	\$397,349.08	\$496,686.80	\$397,349.08	\$2,887.23	\$99,337.72

Summary of Any Objection to Monthly Fee Statements: None⁸

Compensation South in this Application Not Yet Paid: \$99,337.72

⁸ The objection deadline to Dentons' Third Monthly Fee Statement was April 14, 2025; the objection deadline to Dentons' Fourth Monthly Fee Statement was July 16, 2025; the objection deadline to Dentons' Fifth Monthly Fee Statement was July 17, 2025. No objections were filed.

Invoices Attached to the Third Monthly Fee Statement

Dentons US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, California 90017-5704

dentons.com

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

March 6, 2025

Invoice No. 2827921

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	150,481.05
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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
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

March 6, 2025

Invoice No. 2827921

For Professional Services Rendered through January 31, 2025:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/25	S. Maizel	1.10	1,237.50	B110	Zoom conference with Ankura, R. Cetrulo, K. Greer, etc. re pending issues (.9); telephone conference with T. Moyron re same (.2).
01/02/25	T. Moyron	1.10	1,084.05	B110	Zoom conference with Ankura, R. Cetrulo, K. Greer, et al., re pending issues (.9); telephone conference with S. Maizel re same (.2).
01/03/25	S. Schrag	0.20	192.60	B110	Confer with T. Moyron regarding CRO Motion, MOR, and other issues.
01/03/25	C. Doherty, Jr.	0.10	88.65	B110	Draft email to KCC regarding creditor matrix list.
01/03/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re notice of bar date issues.
01/06/25	S. Schrag	0.20	192.60	B110	Confer with T. Moyron regarding CRO motion and call with UST re same.
01/06/25	S. Schrag	1.00	963.00	B110	Participate in call with representative of Wells Fargo Bank (.1); confer with T. Moyron regarding potential motion and related research (.1); correspond with T. Moyron regarding follow-up to motion (.3); conduct research regarding whether terminating banking relationship with customer is protected by the automatic stay (.5).
01/06/25	G. Medina	0.50	209.25	B110	Review request from T. Moyron regarding MOR filing (0.1); prepare and file MOR for the month ending November 2024 (0.4).

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/06/25	T. Moyron	1.10	1,084.05	B110	Analyze issues related to banking relationship and related matters (.7); correspond with S. Schrag re same (.3); call with Wells Fargo representative (.1).
01/06/25	T. Moyron	0.20	197.10	B110	Correspondence from J. Lau, et al., re MOR.
01/06/25	T. Moyron	0.90	886.95	B110	Call with I. Lee, R. Cetrulo, et al., re WCC (.8); correspond with GC regarding draft statement (.1).
01/06/25	T. Moyron	0.60	591.30	B110	Attention to issues related to CRO motion, UST issue and related matters.
01/07/25	T. Moyron	1.00	985.50	B110	Zoom conference with K. Greer, counsel for C. Otiko, S. Maizel, et al., re pending issues.
01/07/25	T. Moyron	0.10	98.55	B110	Review and respond to emails re notice issues re bar date.
01/07/25	G. Medina	0.40	167.40	B110	Review request from T. Moyron and send First-Day Declaration, cash management motion, DOJ stipulation and exhibits extending the stipulation.
01/07/25	S. Schrag	0.10	96.30	B110	Confer with T. Moyron regarding CRO motion.
01/07/25	S. Schrag	1.80	1,733.40	B110	Conduct further research regarding termination of bank account relationship.
01/07/25	S. Schrag	0.20	192.60	B110	Confer with K. Howard regarding statutory requirements for case administration.
01/07/25	S. Maizel	1.00	1,125.00	B110	Zoom conference with K. Greer, counsel for C. Otiko, T. Moyron, etc. re pending issues.
01/07/25	S. Maizel	0.10	112.50	B110	Review and respond to emails re notice issues re bar date.
01/07/25	V. Durrer	0.50	897.75	B110	Analysis re continued access to bank accounts (.3); call with client re same (.2).
01/09/25	T. Moyron	1.10	1,084.05	B110	Analyze weekly report (.3); call with I. Lee re same (.5); exchange emails with Ankura re same (.2); prepare mail to DOJ attaching same (.1).

Global Wound Care Medical Group, A Professional Corporation
 Matter: 15816151-000002
 Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/09/25	S. Maizel	1.10	1,237.50	B110	Zoom conference with R. Cetrullo, T. Moyron, etc. re pending issues (.5); telephone conference with T. Moyron re same (.2); telephone conference with k. Greer re same (.1); telephone conference with I. Lee re same (.1); review and respond to emails re same (.2).
01/09/25	S. Maizel	0.50	562.50	B110	Review and respond to emails re PCO requests.
01/09/25	T. Moyron	1.10	1,084.05	B110	Zoom conference with R. Cetrullo, S. Maizel, et al., re pending issues (.5); telephone conference with S. Maizel re same (.2); telephone conference with K. Greer re same (.1); telephone conference with I. Lee re same (.1); review and respond to emails re same (.2).
01/09/25	T. Moyron	0.50	492.75	B110	Review and respond to emails re PCO requests.
01/10/25	T. Moyron	0.30	295.65	B110	Correspondence regarding CNO on CRO appointment.
01/10/25	T. Moyron	0.70	689.85	B110	Attention to CRO motion and correspondence with S. Ruben, et al., re same.
01/10/25	G. Miller	0.40	356.40	B110	Review draft letter to Wells Fargo and related cash management order.
01/10/25	S. Maizel	0.20	225.00	B110	Review and respond to email re CNO on CRO appointment.
01/10/25	S. Maizel	0.60	675.00	B110	Review and respond to emails re interview and document requests from PCO.
01/10/25	C. Doherty, Jr.	0.40	354.60	B110	Conference call with UST counsel concerning CRO motion (.1); review and respond to emails concerning CRO motion (.1); prepare CRO Motion CONO (.2).
01/13/25	C. Doherty, Jr.	0.30	265.95	B110	Prepare and supervise filing of CONO regarding CRO Motion.
01/13/25	S. Maizel	0.50	562.50	B110	Review and respond to emails re PCO requests re interviews (.4); telephone conference with PCO re same (.1).
01/13/25	T. Moyron	0.40	394.20	B110	Analyze MOR (.2) and call and emails with Ankura re same (.2).

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/13/25	T. Moyron	0.30	295.65	B110	Analyze emails from S. Raja, et al. re PCO.
01/13/25	T. Moyron	0.20	197.10	B110	Analyze emails from R. Cetrulo and I. Lee following call with DOJ.
01/13/25	G. Medina	0.70	292.95	B110	Correspond with C. Doherty regarding the certificate of no objection to the CRO Motion (0.2); assemble for filing and send to C. Doherty for review (0.3); edit and file certificate of no objection (0.2).
01/14/25	G. Medina	0.70	292.95	B110	Correspond with C. Doherty regarding filing first report of patient care ombudsman (0.1); prepare for filing first report and correspond with C. Doherty regarding period of report (0.3); correspond with S. Maizel regarding first report and file (0.3).
01/14/25	T. Moyron	0.50	492.75	B110	Correspondence regarding PCO report and filing (.3); and analyze and prepare cover sheet (.2).
01/14/25	T. Moyron	0.20	197.10	B110	Call with R. Cetrulo re WCC and other matters.
01/14/25	C. Doherty, Jr.	1.00	886.50	B110	Review and respond to email regarding CRO Motion (.2); review order entered by court regarding CRO motion (.1); prepare and supervise filing of PCO Ombudsman report (.6).
01/14/25	S. Maizel	0.40	450.00	B110	Telephone conference with PCO re filing of PCO first report (.1); review and respond to emails re same (.3).
01/14/25	S. Maizel	0.10	112.50	B110	Review entered order re appointment of the PCO.
01/14/25	S. Maizel	1.60	1,800.00	B110	Zoom conference with Ankura, T. Moyron, etc. re pending monthly weekly report to DOJ (1.0); telephone conference with T. Moyron and I. Lee re same (.3); telephone conference with T. Moyron re same (.3).
01/15/25	S. Maizel	0.50	562.50	B110	Zoom conference with T. Moyron re pending issues.
01/15/25	T. Moyron	0.20	197.10	B110	Call with R. Cetrulo and S. Maizel re reimbursements.
01/15/25	T. Moyron	0.40	394.20	B110	Call with I. Lee re budget, calculation and related matters.

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/15/25	T. Moyron	1.80	1,773.90	B110	Call with I. Lee re budget and related matters (.7); meeting with R. Cetrulo and I. Lee re same (1.0).
01/17/25	T. Moyron	1.80	1,773.90	B110	Team meeting with DOJ (A. Curtis, et al.), HLB, Ankura and S. Maizel re settlement negotiations and Ankura analysis (1.3); call with I. Lee re same (.1) and call with HLB, I. Lee and S. Maizel et al re same and next steps (.4).
01/17/25	T. Moyron	0.20	197.10	B110	Correspond with K. Ortiz re Wells Fargo.
01/17/25	T. Moyron	1.00	985.50	B110	Correspond with counsel for Otiko (.2); correspond with HLB regarding meeting time (.2); analyze letters from Otiko's counsel (.6).
01/17/25	C. Doherty, Jr.	0.10	88.65	B110	Review correspondence sent from Mr. Otiko.
01/21/25	S. Maizel	0.40	450.00	B110	Zoom conference with R. Cetrullo, T. Moyron, I. Lee, etc. re pending issues.
01/21/25	T. Moyron	0.40	394.20	B110	Zoom conference with R. Cetrullo, S. Maizel, I. Lee, et al., re pending issues.
01/23/25	T. Moyron	0.70	689.85	B110	Zoom conference with R. Cetrullo, K. Manning, I. Lee, HLB attorneys, Ankura, et al., re pending issues.
01/23/25	S. Maizel	0.70	787.50	B110	Zoom conference with R. Cetrullo, K. Manning, I. Lee, HLB attorneys, Ankura, etc. re pending issues.
01/23/25	C. Doherty, Jr.	0.80	709.20	B110	Attend conference call with third party counsel regarding CMS negotiations.
01/27/25	S. Schrag	0.30	288.90	B110	Confer with T. Moyron regarding bar date motion, exclusivity period, fee application, and other open items.
01/27/25	T. Moyron	1.70	1,675.35	B110	Conference call regarding WCC with D. Schumaker, et al. and analyze analysis (1.2); call with R. Cetrulo and S. Maizel re restructuring (.1); emails regarding pending matters, including OCP motion (.4).
01/30/25	T. Moyron	0.20	197.10	B110	Attend daily huddle with GWC, et al., regarding pending matters.
01/30/25	T. Moyron	0.20	197.10	B110	Correspondence with R. Millien, et al., re litigation and communications.

Global Wound Care Medical Group, A Professional Corporation
 Matter: 15816151-000002
 Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/30/25	S. Maizel	0.20	225.00	B110	Zoom conference with I. Lee, R. Cetrullo, etc. re pending issues.
01/31/25	T. Moyron	0.50	492.75	B110	Call with K. Manning re pending matters and next steps, including discussion with counsel for Otiko.
01/31/25	T. Moyron	0.40	394.20	B110	Call with R. Manning and S. Maizel re pending matters, including call with Otiko's counsel.
	Subtotal	38.70	38,132.55		

B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
01/06/25	J.A. Moe, II	0.10	90.45	B160	In regard to the Second Monthly Fee Application, E-Mail to S. Maizel on preparing Dentons Invoice for December.
01/06/25	J.A. Moe, II	0.20	180.90	B160	Review the current draft of Dentons' Second Monthly Fee Application.
01/08/25	G. Miller	1.10	980.10	B160	Review draft Togut engagement letter and comment re same.
01/09/25	G. Miller	0.20	178.20	B160	Emails with R. Cetrullo re Togut engagement letter.
01/09/25	G. Miller	1.60	1,425.60	B160	Prepare application to employ Togut.
01/09/25	G. Medina	0.40	167.40	B160	Draft December monthly compensation report and send to S. Ruben and R. Richards.
01/10/25	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and C. Doherty re Ankura engagement letter.
01/14/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re preparation of monthly fee application.
01/14/25	J.A. Moe, II	0.10	90.45	B160	In regard to the Second Monthly Fee Statement, exchange E-Mails with S. Maizel on the December Invoices for submission to the Bankruptcy Court.
01/15/25	J.A. Moe, II	0.40	361.80	B160	In regard to the Second Monthly Fee Application, review November Invoice and exchange E-Mails with S. Maizel on calculating the amount being requested in fees for November (and awaiting completion of the December Invoice).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/15/25	J.A. Moe, II	0.70	633.15	B160	Prepare a revised draft of the Second Monthly Fee Application.
01/15/25	J.A. Moe, II	0.10	90.45	B160	E-Mail to K. Howard transmitting the latest version of the Second Monthly Fee Application.
01/15/25	K.M. Howard	0.70	274.05	B160	Review emails (x3) regarding initial monthly fee application (.1); review November 2024 billing statement re revisions to December 2024 billing statement (.4); review email regarding travel time for October and November 2024 (.1); review email from S. Maizel regarding same (.1).
01/15/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re preparation of monthly fee application.
01/17/25	K.M. Howard	0.10	39.15	B160	Analysis of emails regarding the pending monthly fee application for December 2024.
01/20/25	S. Schrag	0.90	866.70	B160	Review material in support of Ankura fee statement (.8); confer with T. Moyron regarding the same (.1).
01/21/25	J.A. Moe, II	0.10	90.45	B160	E-Mail to S. Maizel and exchange E-Mails with C. Arias on status of completing the December Invoice for the Second Monthly Fee Statement.
01/21/25	J.A. Moe, II	0.60	542.70	B160	Revise and expand Dentons First Interim Fee Application and charts, for the period October 21, 2024 through January 31, 2025.
01/21/25	J.A. Moe, II	2.00	1,809.00	B160	In regard to Dentons' First Interim Fee Application: prepare first draft of an Order approving the Fee Application (.30); prepare first draft of the Certification Of Samuel R. Maizel (a Declaration) in support of the Fee Application (.30); prepare first draft of the form of the Charts that are part of Exhibit "A" to the Fee Application (.20); revise Dentons' First Interim Fee Application (.60); retrieve drafts of Charts to be attached as Exhibits "E" through "H" and create Form of four more Charts (.20); make further revisions and expand with two inserts Dentons' First Interim Fee Application (.40).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/21/25	S. Schrag	0.90	866.70	B160	Comment on material in support of Ankura fee statement (.8); confer with T. Moyron regarding the same (.1).
01/22/25	J.A. Moe, II	0.80	723.60	B160	Review and revise the first draft of the Charts to be attached to the First Interim Fee Application (.60); review and further revise Exhibit "H" (.10); review revised Exhibits formatted for Exhibits "F," "G" and "H" (.10).
01/22/25	J.A. Moe, II	0.20	180.90	B160	Review the revised proposed Order approving Dentons' First Interim Fee Application, and prepare Cover Sheet for the Order.
01/22/25	J.A. Moe, II	0.30	271.35	B160	In regard to Dentons' First Interim Fee Application, revise the Certification Of S. Maizel (.20); review the completed Certification (.10).
01/23/25	G. Miller	0.50	445.50	B160	Create Parties in Interest List re Togut Retention Application.
01/24/25	G. Miller	0.20	178.20	B160	Further prepare OCP motion and email T. Moyron re same.
01/24/25	G. Miller	2.20	1,960.20	B160	Review and comment on Togut retention application.
01/24/25	S. Maizel	0.30	337.50	B160	Review and respond to emails from T. Tran, Ankura, re professional fees.
01/24/25	S. Maizel	0.30	337.50	B160	Review and respond to emails re preparation of monthly fee application.
01/24/25	J.A. Moe, II	0.60	542.70	B160	In regard to the First Interim Fee Application: Prepare formatted Charts.
01/24/25	J.A. Moe, II	0.80	723.60	B160	In regard to the First Interim Fee Application, revise the Application, further then revise the Application to reference each of the Categories of Service to later complete descriptions of services (.60); dictate draft of Memorandum on each separate description of service on which information is required to complete the Application (.20).

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01/24/25	J.A. Moe, II	0.40	361.80	B160	Review the status of the Invoice for the Second Monthly Fee Statement (.1); commence assembly of documents and information for the First Interim Fee Application (.4).
01/24/25	T. Moyron	0.30	295.65	B160	Review and respond to emails from T. Tran, Ankura, re professional fees.
01/24/25	T. Moyron	0.30	295.65	B160	Review and respond to emails re preparation of monthly fee application.
01/24/25	K.M. Howard	0.10	39.15	B160	Confer with J. Moe regarding status of monthly billing statements.
01/27/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re OCP motion.
01/27/25	S. Maizel	0.30	337.50	B160	Review and respond to emails re preparation of second monthly fee application.
01/27/25	G. Miller	0.20	178.20	B160	Further prepare application to employ Togut.
01/27/25	J.A. Moe, II	0.70	633.15	B160	In regard to the Second Monthly Fee Application, review status of the December Invoices, reviewing E-Mails from T. Moyron and C. Arias on completing the Invoices (.10); telephone call to C. Arias on December Invoices (.10); review the December Invoice (.10); exchange E-Mails with S. Maizel re the Second Monthly Fee Statement, then review the Statement for the calculations (.20); telephone call with C. Arias various Invoices (.20).
01/27/25	J.A. Moe, II	0.60	542.70	B160	In regard to Dentons' First Interim Fee Application, revise the draft of the Memorandum on work performed between October 21st and January 31st, and an summary of the work performed over that period.
01/27/25	J.A. Moe, II	0.10	90.45	B160	Review Dentons' First Interim Fee Application.

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/27/25	J.A. Moe, II	0.80	723.60	B160	In regard to Dentons' First Interim Fee Application, draft and revise description of services performed by Dentons and instructions on inserting description into the Interim Fee Application (.60); prepare draft of the description of services for non-working travel time (.20).
01/27/25	J.A. Moe, II	0.50	452.25	B160	Review revised Dentons' First Interim Fee Application, review and revise the Charts attached as Exhibit C (.40); review the revised partially completed Exhibits C to Dentons' First Interim Fee Application (.10).
01/27/25	J.A. Moe, II	0.50	452.25	B160	In regard to Dentons' First Interim Fee Application, review the Docket, identify key documents, then review the Ombudsman's Report and the two Stipulations with the Department of Justice (and Department of Health & Human Services).
01/27/25	J.A. Moe, II	0.10	90.45	B160	In regard to Dentons' First Interim Fee Application, retrieve and review the Master Cover Sheet Chart for the First Interim Application.
01/28/25	J.A. Moe, II	0.20	180.90	B160	In regard to the Second Monthly Fee Application, return call to K. Howard discussing the contents of the two Invoices and the dates during which services reflected in the Invoices were performed.
01/28/25	J.A. Moe, II	0.70	633.15	B160	In regard to Dentons' First Interim Fee Application, review and revise descriptions of services for November (.20); revise Second Monthly Fee Application as to the time and descriptions of services for November (.50).
01/28/25	J.A. Moe, II	0.30	271.35	B160	In regard to Dentons' First Interim Fee Application, review and revise description of services in connection with Dentons' Employment Applications and Dentons' Fee Applications; revise description of services performed in regard to Non-Working Travel in the Application.
01/28/25	S. Schrag	0.80	770.40	B160	Review and comment on Ankura material in support of fee statement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/28/25	G. Miller	2.10	1,871.10	B160	Further prepare Togut retention application and calls with C. Doherty and A. Glaubach re same.
01/28/25	G. Miller	0.40	356.40	B160	Review Ankura December monthly fee statement.
01/28/25	C. Doherty, Jr.	0.10	88.65	B160	Discuss local procedure regarding retention application with G. Miller.
01/28/25	K.M. Howard	5.00	1,957.50	B160	Initial analysis of revised billing statement in conjunction with preparing Monthly Fee Application for December 2024 (.4); telephone conference with J. Moe regarding partial November 2024 billing statement (.1); review November 2024 invoice and compile information to prepare Second Monthly Fee Application (1.3); review December 2024 invoice and compile information to prepare Second Monthly Fee Application (1.2); prepare chart reflecting compensation by project category (.5); prepare chart reflecting compensation by professionals and paraessionals (.8); prepare chart reflecting expenses (.2).
01/28/25	G. Medina	0.40	167.40	B160	Review G. Miller's request and prepare for filing Ortiz Declaration with exhibits related to Togut retention and send for his review.
01/28/25	T. Moyron	0.40	394.20	B160	Correspond with G. Miller (.1) and analyze employment application (.3).
01/29/25	G. Medina	0.60	251.10	B160	Prepare Togut retention application with exhibits and send to G. Miller for review (0.4); file retention application (0.2).
01/29/25	K.M. Howard	2.60	1,017.90	B160	Telephone conference with J. Moe regarding the December Monthly Fee Application (.1); review and revise chart reflecting compensation by project category (.4); review and revise chart reflecting compensation by professionals and paraessionals (.9); review chart reflecting expenses (.1); prepare Second Monthly Fee Application for November - December 2024 (1.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/29/25	S. Maizel	0.50	562.50	B160	Review and respond to emails re preparation of second monthly fee application (.2); review and revise same (.3).
01/29/25	G. Miller	0.60	534.60	B160	Finalize and file Togut retention application.
01/29/25	J.A. Moe, II	0.30	271.35	B160	In regard to Dentons' First Interim Fee Application, revise the descriptions of services on Dentons' Employment Applications and Dentons' Fee Applications and on Dentons' Non-Working Travel.
01/29/25	J.A. Moe, II	0.40	361.80	B160	In regard to the Second Monthly Fee Statement, review calculations in the Fee Statement (.20); telephone call to K. Howard discussing the calculations in the Fee Statement (.10); exchange E-Mails with K. Howard on final review of the Second Monthly Fee Statement (.10).
01/29/25	J.A. Moe, II	0.50	452.25	B160	In regard to the Second Monthly Fee Statement, revise the language in the Fee Statement to conform to the review and revisions to the Statement made on January 28th (.30); further edit the Second Monthly Fee Statement (.10); review the proposed completed Fee Statement (.10).
01/29/25	J.A. Moe, II	0.30	271.35	B160	In regard to the Second Monthly Fee Statement, review and incorporate minor changes into the Fee Statement, then retrieve the two Invoices to be attached to the Fee Statement, then prepare E-Mail to and forward revised Fee Statement and two Invoices to S. Maizel.
01/30/25	J.A. Moe, II	0.60	542.70	B160	In regard to the Second Monthly Fee Statement, telephone call and E-Mail to Sj. Maizel on a billing entry and inclusion of expenses (.10); E-Mail to C. Arias on final revisions to descriptions of services in Invoices (.10); telephone call from C. Arias discussing the status of completing Invoices (.10); review previously proposed changes to the Invoices (.10); second telephone call with C. Arias on specific change previously requested (.10); telephone call to K. Howard on possible revisions to the Charts attached to the Second Monthly Fee Statement (.10).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/31/25	K.M. Howard	0.40	156.60	B160	Discussion with J. Moe regarding possible pending change in December Fee Application (.1); review chart allocating amounts billed to task codes (.3).
01/31/25	S. Maizel	0.30	337.50	B160	Review and respond to emails re second monthly fee application.
01/31/25	J.A. Moe, II	0.30	271.35	B160	In regard to the Second Monthly Fee Application, review and forward to C. Arias S. Maizel's E-Mail on Invoices (.10); telephone call and E-Mail to C. Arias on completing the Invoices (.10); additional telephone call with C. Arias on the Invoices (.10).
01/31/25	J.A. Moe, II	0.10	90.45	B160	In regard to the Third Monthly Fee Statement, prepare formatted version of the Fee Statement to be completed with amounts, calculations, the identities of attorneys performing services and expenses incurred.
01/31/25	J.A. Moe, II	0.10	90.45	B160	In regard to the Third Monthly Fee Statement, and in accordance with request for information, review list of attorneys who provided service, and the Categories of Services performed during the month of January.
	Subtotal	39.70	31,196.70		

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B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/25	G. Miller	1.90	1,692.90	B310	Review and comment on draft bar date motion.
01/03/25	G. Miller	3.70	3,296.70	B310	Prepare bar date motion.
01/03/25	S. Schrag	1.20	1,155.60	B310	Confer with G. Miller regarding Bar Date Motion (.1); confer with T. Moyron regarding the same (.1); further prepare the same (.9); confer with P. Leathem of KCC regarding the same (.1).
01/03/25	K.M. Howard	0.10	39.15	B310	Analysis of emails regarding the pending Claims Bar Date Motion.
01/06/25	G. Miller	0.20	178.20	B310	Emails with I. Lee re notice of bar date.
01/07/25	S. Schrag	0.10	96.30	B310	Confer with T. Moyron regarding bar date motion.
01/10/25	S. Schrag	0.60	577.80	B310	Review and analyze bar date motion (.2); further prepare the same (.3); confer with G. Miller and T. Moyron regarding the same (.1).
01/10/25	G. Miller	0.90	801.90	B310	Further prepare bar date motion.
01/13/25	S. Schrag	0.10	96.30	B310	Confer with T. Moyron regarding Bar Date Motion and other items.
01/23/25	G. Miller	0.70	623.70	B310	Follow up with S. Maizel and T. Moyron re bar date motion.
01/23/25	S. Maizel	1.00	1,125.00	B310	Review and revise Bar Date Motion (.9); review and respond to emails re same (.1).
01/23/25	S. Maizel	0.10	112.50	B310	Review and respond to emails from Ankura re notice of Bar Date to patients.
01/23/25	T. Moyron	0.50	492.75	B310	Review and revise Bar Date Motion (.3); review and respond to emails re same (.2).
01/23/25	T. Moyron	0.10	98.55	B310	Review and respond to emails from Ankura re notice of Bar Date to patients.
01/24/25	G. Miller	1.60	1,425.60	B310	Further prepare bar date motion.
01/27/25	G. Miller	0.10	89.10	B310	Follow up with T. Moyron re bar date motion.
	Subtotal	12.90	11,902.05		

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
01/31/25	T. Moyron	1.70	1,675.35	B320	Analyze proposed corporate structure, plan of reorganization and related matters.
	Subtotal	1.70	1,675.35		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
01/02/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails re status of lifting of payment suspension.
01/02/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence regarding status of lifting of payment suspension.
01/03/25	T. Moyron	2.10	2,069.55	MED/CMS	Meeting with DOJ, HLB, S. Maizel, et al., re settlement negotiations and calculations (1.5); meeting with C. Oppeheim re same (.4); call with S. Maizel re same (.2).
01/03/25	S. Maizel	3.00	3,375.00	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, etc. re negotiations re FCA settlement (1.5); telephone conference with T. Moyron re same (.3); zoom conference with HLB attorneys, K. Greer, etc. re discussions with DOJ (.9); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.1).
01/07/25	S. Maizel	0.50	562.50	MED/CMS	Zoom conference with HLB attorneys and T. Moyron re pending issues on DOJ negotiations.
01/07/25	T. Moyron	0.50	492.75	MED/CMS	Zoom conference with HLB attorneys and Maizel re pending issues on DOJ negotiations.
01/08/25	T. Moyron	3.40	3,350.70	MED/CMS	Attention to WCC payments, including correspondence and calls; meeting with DOJ, Ankura, and HLB; analyze updated and related matters.
01/09/25	T. Moyron	0.30	295.65	MED/CMS	Review and respond to email from A. Curtis re distributions to Dr. Releford.
01/09/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to email from A. Curtis re distributions to Dr. Releford.
01/10/25	T. Moyron	1.00	985.50	MED/CMS	Meeting with Dr. Releford, HLB, DocExpress and Ankura.

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/10/25	S. Maizel	0.40	450.00	MED/CMS	Review and respond to emails from A. Curtis re distributions to Dr. Releford (.3); telephone conference with T. Moyron re same (.1).
01/10/25	S. Maizel	3.10	3,487.50	MED/CMS	Zoom conference with billing company, Ankura, HLB attorneys, etc. re analysis of issues for DOJ (1.5); zoom conference with Ankura and HLB attorneys, etc. re same (1.0); multiple telephone conference with T. Moyron re same (.5).
01/10/25	S. Maizel	1.00	1,125.00	MED/CMS	Zoom conference with HLB attorneys and T. Moyron, re WCC issues and DOJ investigation (.9); telephone conference with T. Moyron re same (.1).
01/10/25	T. Moyron	2.00	1,971.00	MED/CMS	Zoom conference with billing company, Ankura, HLB attorneys, et al., re analysis of issues for DOJ (1.5); multiple calls with S. Maizel re same (.5).
01/10/25	T. Moyron	0.40	394.20	MED/CMS	Correspondence with A. Curtis, et al., re distributions to Dr. Releford (.3); telephone conference with S. Maizel re same (.1).
01/13/25	T. Moyron	0.30	295.65	MED/CMS	Analyze D. Schumaker, et al., emails re methodology and timeline re Ankura.
01/13/25	T. Moyron	0.50	492.75	MED/CMS	Call with DOJ, HLB, et al. re settlement negotiations and related matters.
01/13/25	T. Moyron	0.90	886.95	MED/CMS	Call with R. Cetrulo, Dr. Releford, Dr. Ellington, et al., re DOJ meetings, WCC, and restructuring.
01/13/25	S. Maizel	0.50	562.50	MED/CMS	Review emails from HLB re negotiations with DOJ.
01/13/25	S. Maizel	0.50	562.50	MED/CMS	Review and respond to emails re budget issues related to CMS Stipulation.
01/14/25	T. Moyron	1.50	1,478.25	MED/CMS	Call with I. Lee, Ankura, DOJ, HLB, etc. re calculations and settlement discussions.
01/14/25	T. Moyron	0.60	591.30	MED/CMS	Meetings with I. Lee and S. Maizel re DOJ requests and related matters.
01/14/25	S. Maizel	2.40	2,700.00	MED/CMS	Zoom call with Ankura re financial analysis related to DOJ Investigation (.5); zoom conference with DOJ, Ankura and HLB re same (1.5); zoom conference with I. Lee and T. Moyron re same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/14/25	T. Moyron	0.50	492.75	MED/CMS	Teams meeting with B. Ford and D. Schumaker re background and timing of analysis.
01/15/25	S. Maizel	2.50	2,812.50	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, Ankura, etc. re budget issues (1.0); zoom conference with Ankura, HLB attorneys re same (.8); telephone conference with T. Moyron re same (.4); review and respond to emails re same (.3).
01/15/25	S. Maizel	0.10	112.50	MED/CMS	Email to A. Curtis, DOJ, re WCC issues.
01/15/25	T. Moyron	1.50	1,478.25	MED/CMS	Call with DOJ, I. Lee, S. Maizel et al re disbursements, inquiries, budget and related matters (1.1); call with I. Lee same (.4).
01/15/25	T. Moyron	0.80	788.40	MED/CMS	Call with B. Ford, D. Shumacher regarding various matters related to Ankura's support.
01/16/25	T. Moyron	3.20	3,153.60	MED/CMS	Zoom conference with R. Cetrullo, Ankura, HLB, etc. re Amex issues for the DOJ budget (1.1); call with S. Maizel re same (.2); prepare and respond to emails (.6) and analyze related emails and docs (.7); prepare email to DOJ re Amex (.1); review and respond to emails re DOJ budget related issues (.5).
01/16/25	T. Moyron	0.40	394.20	MED/CMS	Review and respond to emails re GWC disbursements for DOJ and related issues.
01/16/25	T. Moyron	0.40	394.20	MED/CMS	Analyze Ankura profits analysis review.
01/16/25	S. Maizel	1.90	2,137.50	MED/CMS	Zoom conference with R. Cetrullo, Ankura, HLB, etc. re Amex issues for the DOJ budget (1.1); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.3); review and respond to emails re DOJ budget related issues (.3).
01/16/25	S. Maizel	0.50	562.50	MED/CMS	Review Ankura profits analysis review.
01/16/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails re GWC disbursements for DOJ.

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/17/25	S. Maizel	3.30	3,712.50	MED/CMS	Zoom conference with Ankura, HLB attorneys, R. Cetrullo, etc. re budget issues for DOJ (.8); telephone conference with T. Moyron re same (.1); zoom conference with DOJ attorneys, HLB attorneys, Ankura, T. Moyron, etc. re same (1.3); zoom conference with HLB attorneys, Ankura, T. Moyron re same (.4); review and respond to emails re same (.6); telephone conference with T. Moyron re same (.1).
01/17/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to correspondence from Sullivan Cromwell attorneys re Dr. Otiko issues with CMS stipulation.
01/17/25	T. Moyron	2.10	2,069.55	MED/CMS	Review Ankura's analysis (.7); call with I. Lee regarding analysis for DOJ (.3), follow up call with I. Lee re same (.1), call with GWC, including R. Cetrullo, I. Lee, et al., re analysis (1.0).
01/23/25	S. Maizel	1.40	1,575.00	MED/CMS	Zoom conference with Ankura and T. Moyron re review of financial data for DOJ issues (1.0); review and respond to emails re same (.4).
01/23/25	S. Maizel	2.50	2,812.50	MED/CMS	Zoom conference re Dr. Otiko issues with K. Greer, D. Schumacher, T. Moyron, etc. (.4); zoom conference with Dr. Otiko's attorneys, K. Greer, D. Schumacher, etc. re same (.9); t/c with T. Moyron re same (.1); review numerous documents re Otiko claims, etc. (.8); review and respond to emails re meeting with Otiko attorneys (.1); emails to R. Millien and K. Greer re same (.2).
01/23/25	T. Moyron	1.40	1,379.70	MED/CMS	Zoom conference with Ankura and S. Maizel re review of financial data for DOJ issues (1.0); review and respond to emails re same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
01/23/25	T. Moyron	2.50	2,463.75	MED/CMS	Zoom conference re Dr. Otiko issues with K. Greer, D. Schumacher, S. Maizel, etc. (.4); zoom conference with Dr. Otiko's attorneys, K. Greer, D. Schumacher, etc. re same (.9); telephone conference with S. Maizel re same (.1); review numerous documents re Otiko claims, etc. (.8); review and respond to emails re meeting with Otiko attorneys (.1); emails to R. Millien and K. Greer re same (.2).
01/24/25	T. Moyron	1.70	1,675.35	MED/CMS	Zoom conference with DOJ attorneys; Ankura, HLB attorneys, etc. re same (1.1); review and respond to emails re same (.5); telephone conference with S. Maizel re same (.1).
01/24/25	T. Moyron	0.80	788.40	MED/CMS	Call with D. Shumacher, Dr. Releford, R. Cetrulo, Ankura, et al., re analysis and status (.5); call with S. Maizel re same (.2); call with D. Schumacher re same (.1).
01/24/25	S. Maizel	2.30	2,587.50	MED/CMS	Zoom conference with Dr. Releford, R. Cetrullo, K. Manning, K. Greer, HLB attorneys, Ankura, et al., re pending financial review issues for DOJ (.5); telephone conference with T. Moyron re same (.1); zoom conference with DOJ attorneys; Ankura, HLB attorneys, et al., re same (1.1); review and respond to emails re same (.5); telephone conference with T. Moyron re same (.1).
01/27/25	T. Moyron	1.30	1,281.15	MED/CMS	Meeting and calls with I. Lee regarding analysis, findings, and timing re DOJ requests.
01/27/25	S. Maizel	0.70	787.50	MED/CMS	Multiple telephone conferences with T. Moyron re negotiations with DOJ.
01/27/25	S. Maizel	0.60	675.00	MED/CMS	Zoom conference with HLB and T. Moyron re WCC issues.
01/29/25	T. Moyron	0.50	492.75	MED/CMS	Call with Ankura, D. Schumaker, et al., regarding update on analysis and related matters.

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2827921

March 6, 2025

Date	Timekeeper	Hours	Amount	Task	Narrative
01/30/25	T. Moyron	0.60	591.30	MED/CMS	Analyze weekly report and related matters (.3); correspond with Ankura, including I. Lee re weekly report (.2); prepare email to DOJ, including A. Curtis re weekly report (.1).
01/30/25	T. Moyron	1.80	1,773.90	MED/CMS	Analyze emails from D. Schumacher, et al., re analysis (.3); Zoom conference with DOJ, HLB, re settlement (.3); analyze materials for DOJ re analysis (1.2).
01/30/25	S. Maizel	0.30	337.50	MED/CMS	Zoom conference with DOJ, HLB, etc. re settlement.
01/31/25	C. Doherty, Jr.	0.30	265.95	MED/CMS	Prepare and supervise filing of second extension of stipulation with DOJ
01/31/25	T. Moyron	1.10	1,084.05	MED/CMS	Correspond with DOJ regarding notice and extended stipulation (.3); correspond with A. Curtis regarding budget (.1); analyze proposed changes to notice (.2); correspond with C. Doherty re same (.2) and analyze proposed changes (.1); prepare email to GWC, et al., re notice and budget (.1); prepare email to DOJ re updated notice re extended stipulation (.1).
01/31/25	T. Moyron	0.30	295.65	MED/CMS	Analyze email from Ankura re budget (.1); analyze budget (.2).
01/31/25	T. Moyron	0.40	394.20	MED/CMS	Analyze emails from Ankura, including I. Lee. and B. Ford, and HLB re proposed methodology and evaluation.
01/31/25	S. Maizel	0.30	337.50	MED/CMS	Telephone conference with T. Moyron and A. Curtis, DOJ, re continuation of stipulation and settlement negotiations.
01/31/25	G. Medina	0.40	167.40	MED/CMS	Prepare for filing second extension regarding Medicare payments and send to C. Doherty for review (0.2); file second extension of stipulation (0.2).
	Subtotal	64.60	67,424.40		

Global Wound Care Medical Group, A Professional Corporation
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 Invoice No.: 2827921

March 6, 2025

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 1,125.00	41.10	\$ 46,237.50
T. Moyron	\$ 985.50	58.20	\$ 57,356.10
V. Durrer	\$ 1,795.50	0.50	\$ 897.75
G. Miller	\$ 891.00	18.60	\$ 16,572.60
J.A. Moe, II	\$ 904.50	14.50	\$ 13,115.25
C. Doherty, Jr.	\$ 886.50	3.10	\$ 2,748.15
S. Schrag	\$ 963.00	8.40	\$ 8,089.20
S. Ruben	\$ 751.50	0.10	\$ 75.15
G. Medina	\$ 418.50	4.10	\$ 1,715.85
K.M. Howard	\$ 391.50	<u>9.00</u>	<u>\$ 3,523.50</u>
Totals		157.60	\$ 150,331.05

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	38,132.55
B160	Fee Applications/Employment Applications	31,196.70
B310	Claims Administration and Objections	11,902.05
B320	Plan and Disclosure Statement (including Business Plan)	1,675.35
MED/CMS	Medicare/CMS Issues	67,424.40
	Total Fees	\$150,331.05

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
1/7/2025	WESTLAW SCHRAG\ SARAH	150.00
	SUBTOTAL	150.00
	Total Disbursements	\$150.00

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March 6, 2025

COMBINED TOTALS

Total Hours		157.60
Fee Total, all Matters	\$	150,331.05
Disbursement Total, all Matters	\$	150.00
Invoice Total, all Matters		<hr/>
	\$	<u>150,481.05</u>

Invoices Attached to the Fourth Monthly Fee Statement

Dentons US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, California 90017-5704

dentons.com

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

March 28, 2025

Invoice No. 2834449

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	183,432.35
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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
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

March 28, 2025

Invoice No. 2834449

For Professional Services Rendered through February 28, 2025:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
02/03/25	S. Maizel	0.20	225.00	B110	Multiple telephone conference with T. Moyron re pending issues.
02/04/25	T. Moyron	0.30	295.65	B110	Participate in daily huddle with R. Cetrulo, et al.
02/04/25	S. Schrag	0.30	288.90	B110	Confer with T. Moyron regarding Bar Date Motion, Ordinary Course Professionals Motion, bank account relationships, Plan, and Extension Motion.
02/06/25	S. Maizel	0.40	450.00	B110	Zoom conference with R. Millien, R. Cetrullo, K. Manning, Ankura, etc. re pending issues.
02/06/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re Medicare coverage regarding substitute skin grafts with J. Ziegler, etc.
02/10/25	S. Maizel	0.50	562.50	B110	Telephone conference with J. Ziegler and T. Moyron re wound care issues and pending LCDs, etc. (.4); review and respond to emails re same (.1).
02/10/25	T. Moyron	0.50	492.75	B110	Telephone conference with J. Ziegler and S. Maizel re wound care issues and pending LCDs, etc. (.4); review and respond to emails re same (.1).
02/11/25	S. Maizel	0.70	787.50	B110	Zoom conference with I. Lee, R. Cetrullo, R. Millien, etc. re pending issues (.3); telephone conference with T. Moyron re same (.4).
02/11/25	K.M. Howard	0.70	274.05	B110	Review email from J. Moe regarding UCC searches for all states in which Debtor is licensed (.1); review lien search results (.4); prepare email to J. Moe regarding findings (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/13/25	S. Maizel	1.60	1,800.00	B110	Telephone conference with T. Moyron re pending issues (.3); zoom conference with Ankura, HLB, R. Cetrullo, etc. re pending issues (1.3).
02/13/25	T. Moyron	1.60	1,576.80	B110	Telephone conference with S. Maizel re pending issues (.3); zoom conference with Ankura, HLB, R. Cetrullo, et al., re pending issues (1.3).
02/17/25	T. Moyron	0.30	295.65	B110	Multiple calls with S. Maizel re pending issues.
02/18/25	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to emails regarding upcoming deadlines.
02/18/25	S. Maizel	1.20	1,350.00	B110	Zoom conference with R. Cetrullo, R. Millien, I. Lee, etc. re pending issues (.3); telephone conference with I. Lee re same (.2); telephone conference with R. Millien re same (.1); telephone conference with D. Schumacher re same (.2); telephone conference with I. Lee re same (.2); telephone conference with T. Moyron re same (.2).
02/19/25	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to emails regarding local rules and other matters.
02/20/25	T. Moyron	1.00	985.50	B110	Zoom conference with R. Millien, R. Cetrullo, K. Manning, I. Lee, et al., re pending issues (.8); zoom with R. Millien and S. Maizel re same (.2).
02/20/25	T. Moyron	0.90	886.95	B110	Zoom with Dr. Releford's counsel, HLB attorneys, etc. re pending issues.
02/20/25	S. Maizel	1.00	1,125.00	B110	Zoom conference with R. Millien, R. Cetrullo, K. Manning, I. Lee, etc. re pending issues (.8); zoom with R. Millien and T. Moyron re same (.2).
02/20/25	S. Maizel	0.90	1,012.50	B110	Zoom with Dr. Releford's attorney, HLB attorneys, etc. re pending issues.
02/21/25	S. Maizel	0.40	450.00	B110	Multiple telephone conference with T. Moyron re pending issues.
02/21/25	S. Maizel	0.10	112.50	B110	Review weekly report for week 9.
02/21/25	T. Moyron	0.40	394.20	B110	Multiple calls with S. Maizel re pending issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/21/25	C. Doherty, Jr.	0.30	265.95	B110	Review and respond to emails regarding filings and referring Winstead to conflicts counsel (.2); call with G. Miller regarding local procedure question (.1).
02/24/25	S. Schrag	0.10	96.30	B110	Confer with T. Moyron regarding upcoming events and reminders re OCP Motion, Interim Fee Application, and DOJ Stipulation.
02/26/25	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to emails from interested parties.
02/27/25	T. Moyron	0.40	394.20	B110	Correspondence regarding credentialing issues with R. Cetrulo, A. Curtis, et al. (.3); telephone conference with S. Maizel re same (.1).
02/27/25	S. Maizel	0.40	450.00	B110	Review and respond to emails re credentialing issues with R. Cetrulo, A. Curtis, etc. (.3); telephone conference with T. Moyron re same (.1).
02/28/25	T. Moyron	0.30	295.65	B110	Correspondence with A. Curtis, et al., re credentialing issues.
02/28/25	S. Maizel	0.30	337.50	B110	Review and respond to emails re credentialing issues.
	Subtotal	15.40	15,784.65		

B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
02/01/25	S. Schrag	0.20	192.60	B160	Confer with T. Moyron regarding Ankura fee application.
02/03/25	J.A. Moe, II	0.20	180.90	B160	Review e-mails from T. Moyron, C. Arias on completing the Fee Statement (.10); additional telephone call on Invoices and filing the Second Monthly Fee Statement (.10).
02/04/25	S. Maizel	0.20	225.00	B160	Review and respond to emails re second monthly fee application.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/04/25	K.M. Howard	2.00	783.00	B160	Email exchanges with J. Moe regarding statement (.1); review December 2024 invoice (.6); prepare revised chart of compensation by project category (.8); revise and finalize Dentons' Second Monthly Fee Application (.3); prepare email to J. Moe and conference with J. Moe regarding the changes (.2).
02/05/25	J.A. Moe, II	0.80	723.60	B160	Preparing Third Monthly Fee Statement and attached Charts (.40); review attorneys and rates for January Invoice and create Memorandum (.30); revise the Fee Statements (.10).
02/05/25	J.A. Moe, II	0.60	542.70	B160	Revising Third Monthly Fee Application (.40); further revise Charts (.10); review the Cover Sheet for the First Interim Fee Application (.10).
02/06/25	J.A. Moe, II	0.20	180.90	B160	Review and respond to emails re Invoice for January; exchange e-mails with S. Maizel on preparation of the January Invoice.
02/06/25	S. Maizel	0.20	225.00	B160	Review and respond to emails re preparation of monthly fee application.
02/06/25	T. Moyron	0.90	886.95	B160	Analyze bar date motion and related documents (.7); email with G. Miller re same (.2).
02/09/25	J.A. Moe, II	0.10	90.45	B160	Review email re Dentons' First Interim Monthly Application; telephone call to S. Maizel on completing the Application.
02/10/25	S. Maizel	0.20	225.00	B160	Review and respond to emails re preparation of second monthly fee application.
02/10/25	T. Moyron	0.20	197.10	B160	Review and respond to emails re preparation of second monthly fee application.
02/10/25	J.A. Moe, II	1.60	1,447.20	B160	Revising Dentons' First Interim Fee Application (.30); review the Invoices and prepare descriptions of the Categories of Services (.60); prepare draft of the descriptions of Dentons' work in various Categories (.70).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/10/25	J.A. Moe, II	0.10	90.45	B160	Exchange e-mails with T. Moyron on completing Second Monthly Fee Statement and fees incurred before November 26th.
02/11/25	J.A. Moe, II	0.10	90.45	B160	In regard to the Second Monthly Fee Statement, calculate fees incurred prior to November 26th.
02/11/25	J.A. Moe, II	1.90	1,718.55	B160	Review and revise draft of the descriptions of work in various Categories Of Services (.90); review and revise the First Interim Fee Application (.10); review the First Day Declaration of R. Cetrulo for reference in the Fee Application (.10); revise First Interim Fee Application, reviewing and revising First Interim Fee Application (.80).
02/18/25	J.A. Moe, II	0.10	90.45	B160	E-mail to T. Moyron and S. Maizel on revision to the descriptions in the Second Monthly Fee Statement and the Third Monthly Fee Statement.
02/18/25	J.A. Moe, II	0.20	180.90	B160	Revise Second Monthly Fee Statement.
02/19/25	J.A. Moe, II	0.40	361.80	B160	Exchange e-mails and review and revise the First Interim Fee Application.
02/19/25	J.A. Moe, II	0.10	90.45	B160	Review the draft of the Third Monthly Fee Application.
02/20/25	S. Schrag	1.80	1,733.40	B160	Confer with T. Moyron and G. Miller regarding Ankura fee statements (.3); review retention application (.2); review retention order (.2); review interim compensation order (.2); prepare Ankura fee statement (.9).
02/20/25	J.A. Moe, II	0.40	361.80	B160	Review and respond to e-mails with T. Moyron on modifications to the Second Monthly Fee Statement, revise the Fee Statement, and forward to T. Moyron.
02/21/25	G. Miller	1.10	980.10	B160	Prepare Ankura monthly fee statements.
02/21/25	S. Schrag	3.20	3,081.60	B160	Prepare first consolidated monthly fee statement of Ankura (1.6); prepare second monthly fee statement of Ankura (1.1); confer with T. Moyron, G. Miller, G. Medina, and C. Doherty regarding the same (.2); confer with I. Lee regarding the same (.2); confer with G. Medina regarding the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/21/25	T. Moyron	0.70	689.85	B160	Analyze Ankura employment applications (.4) and emails regarding same (.3).
02/22/25	S. Schrag	0.40	385.20	B160	Confer with T. Moyron regarding Ankura fee statement (.1); finalize Ankura fee statement (.2); confer with G. Medina regarding the same (.1).
02/24/25	S. Maizel	0.30	337.50	B160	Review and respond to emails re revisions to second monthly fee application.
02/24/25	J.A. Moe, II	0.20	180.90	B160	Prepare revised version of the Third Monthly Fee Statement.
02/24/25	T. Moyron	0.30	295.65	B160	Attention to second monthly fee application.
02/24/25	G. Medina	0.40	167.40	B160	Receive and prepared CNO for Togut, Segal & Segal related to their retention application and file with the court.
02/25/25	C. Doherty, Jr.	0.10	88.65	B160	Review order approving Togut as Conflicts counsel.
02/25/25	K.M. Howard	0.20	78.30	B160	Telephone conferences (x2) with J. Moe regarding the third monthly fee application and the first interim fee application.
02/26/25	S. Maizel	0.10	112.50	B160	Review and respond to filing of second monthly fee application .
02/26/25	J.A. Moe, II	1.80	1,628.10	B160	Continue preparation of the First Interim Fee Application.
02/26/25	J.A. Moe, II	0.40	361.80	B160	Analyze issue re First Interim Fee Application.
02/26/25	G. Medina	0.20	83.70	B160	Correspond with docketing regarding calendaring objection deadline related to DUS second monthly fee application.
02/27/25	S. Maizel	1.20	1,350.00	B160	Review and respond to emails re first interim fee application (.3); revising first interim fee application (.8); office conference with J. Moe re same (.1).
02/27/25	T. Moyron	0.40	394.20	B160	Attention to first interim fee application.
02/28/25	G. Medina	1.00	418.50	B160	Call with J. Moe regarding Dentons first intern fee application (0.2); prepare and assemble Dentons first interim fee application and send to J. Moe for review (0.4); call with J. Moe regarding invoices (0.1); file Dentons first interim fee application (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/28/25	T. Moyron	2.00	1,971.00	B160	Review and revise first interim fee application (1.4); telephone conference with J. Moe re same (.1); telephone conference with S. Maizel re same (.2); review and respond to emails re same (.3).
02/28/25	K.M. Howard	0.40	156.60	B160	Telephone conference with J. Moe regarding the interim fee application (.1); assemble information and email to J. Moe regarding same (.3).
02/28/25	S. Maizel	2.60	2,925.00	B160	Review and revise first interim fee application (2.0); telephone conference with J. Moe re same (.1); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.3).
	Subtotal	29.50	26,305.20		

B200 - Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
02/07/25	S. Maizel	0.30	337.50	B200	Zoom conference with R. Cetrullo, Ankura, etc. re banking relationships.
02/07/25	G. Miller	0.40	356.40	B200	Call with K. Ortiz, A. Glaubach, T. Moyron, I. Lee, R. Cetrulo, and S. Weyler re bank accounts.
02/10/25	S. Maizel	0.50	562.50	B200	Telephone conference with N. Awa re replacement of corporate secretary (.1); telephone conference with T. Moyron re same (.1); review and respond to emails with DOJ and UST re same (.3).
	Subtotal	1.20	1,256.40		

B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
02/06/25	S. Maizel	0.30	337.50	B260	Review and respond to emails re corporate secretary issues.
02/06/25	T. Moyron	0.20	197.10	B260	Analyze emails re corporate secretary issues.
02/13/25	T. Moyron	0.10	98.55	B260	Analyze S. Maizel, et al., emails re new corporate secretary.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/13/25	S. Maizel	0.10	112.50	B260	Review and respond to emails re new corporate secretary.
	Subtotal	0.70	745.65		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
02/05/25	G. Miller	0.30	267.30	B310	Further prepare bar date motion.
02/05/25	K.M. Howard	0.10	39.15	B310	Review emails concerning Claims Bar Date motion.
02/06/25	G. Miller	0.90	801.90	B310	Further prepare bar date motion.
02/06/25	S. Schrag	0.30	288.90	B310	Review correspondence from P. Leathem and G. Miller of Verita regarding Bar Date Motion.
02/06/25	K.M. Howard	0.10	39.15	B310	Review additional emails regarding the claims bar date motion.
02/07/25	G. Medina	0.80	334.80	B310	Review request from G. Miller and prepare for filing Bar date motion with exhibits (0.4); file motion to set last day to file proofs of claim and circulate file stamped copy (0.4).
02/07/25	G. Miller	0.40	356.40	B310	Finalize and file bar date motion.
02/07/25	S. Schrag	0.70	674.10	B310	Confer with G. Miller regarding Bar Date Motion (.1); finalize Bar Date Motion (.5); confer with G. Medina regarding the same (.1).
02/14/25	C. Doherty, Jr.	0.20	177.30	B310	Call with G. Miller regarding filing (.1); review and respond to email regarding filing of stipulation (.1).
02/18/25	G. Miller	0.90	801.90	B310	Prepare order approving bar date motion.
02/18/25	T. Moyron	0.20	197.10	B310	Correspondence re bar date motion revisions for DOJ.
02/19/25	T. Moyron	0.30	295.65	B310	Correspondence re DOJ comments on bar date motion.
02/19/25	G. Miller	1.10	980.10	B310	Further prepare order approving bar date motion (.9); Emails with S. Maizel, T. Moyron, and C. Doherty re same (.2).
02/19/25	S. Maizel	0.40	450.00	B310	Review and respond to emails re DOJ comments on bar date motion.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/21/25	G. Miller	0.40	356.40	B310	Prepare notice re amended bar date order.
02/28/25	C. Doherty, Jr.	0.10	88.65	B310	Review and comment on draft Certificate of Counsel regarding Bar Date Motion.
02/28/25	G. Miller	1.50	1,336.50	B310	Further prepare updated bar date order and certificate of counsel.
	Subtotal	8.70	7,485.30		

B320 - Plan and Disclosure Statement (including Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
02/03/25	G. Miller	0.10	89.10	B320	Call with T. Moyron re plan of reorganization.
02/03/25	G. Miller	1.20	1,069.20	B320	Review sample plans of reorganization.
02/04/25	G. Miller	0.90	801.90	B320	Call with T. Moyron, S. Maizel and GWC re plan outline.
02/04/25	T. Moyron	0.50	492.75	B320	Conference call with R. Cetrulo, R. Millien, G. Miller and S. Maizel re restructuring.
02/04/25	S. Maizel	1.00	1,125.00	B320	Zoom conference with R. Cetrullo, R. Millien, etc. re restructuring plan preparation.
02/05/25	G. Miller	0.40	356.40	B320	Review updated business model and plan provisions re treatment of HHS claims.
02/10/25	S. Maizel	0.50	562.50	B320	Telephone conference with MTS re possible purchase of assets.
02/10/25	S. Maizel	0.70	787.50	B320	Review and respond to emails re plan preparation (.2); review outline of restructuring plan (.5).
02/10/25	G. Miller	2.20	1,960.20	B320	Prepare plan outline.
02/10/25	T. Moyron	1.50	1,478.25	B320	Correspond re plan preparation (.4); analyze and prepare outline of restructuring plan (1.1).
02/11/25	G. Miller	4.00	3,564.00	B320	Further prepare plan outline (3.2); multiple calls with T. Moyron re same (.8).
02/11/25	T. Moyron	2.90	2,857.95	B320	Analyze proposed term sheet and related plan matters and provide comments thereto (2.3); calls and correspondence with G. Miller re same (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/11/25	S. Maizel	0.50	562.50	B320	Zoom conference with R. Millien, R. Cetrulo, I. Lee, etc. re restructuring options.
02/12/25	T. Moyron	1.80	1,773.90	B320	Teams meeting with I. Lee, S. Maizel, and G. Miller regarding plan terms and related matters.
02/12/25	T. Moyron	0.40	394.20	B320	Correspondence with G. Miller re plan.
02/12/25	T. Moyron	1.50	1,478.25	B320	Analyze plan terms and outline and consider related issues.
02/12/25	S. Maizel	1.70	1,912.50	B320	Zoom conference with T. Moyron and G. Miller re term sheet for DOJ re restructuring plan.
02/12/25	G. Miller	2.10	1,871.10	B320	Call with T. Moyron, S. Maizel, and I. Lee re Plan Outline (1.8); Further prepare Plan Outline (.3).
02/12/25	J. Margolies	1.80	712.80	B320	Review, shepardize, and revise citations in motion to extend exclusivity as necessary and email S. Schrag regarding same.
02/12/25	S. Schrag	6.30	6,066.90	B320	Prepare motion to extend exclusivity period (2.3); conduct research regarding the same (2.1); prepare order in support (1.9).
02/13/25	T. Moyron	0.20	197.10	B320	Calls with A. Curtis re plan summary and structure.
02/13/25	T. Moyron	1.70	1,675.35	B320	Analyze proposed structure (.3); analyze and prepare summary of plan and analyze related materials (1.4).
02/13/25	G. Miller	0.20	178.20	B320	Emails with S. Schrag re motion to extend exclusivity.
02/13/25	G. Miller	1.00	891.00	B320	Further prepare plan outline (.8); Calls with T. Moyron re same (.2).
02/14/25	G. Miller	0.50	445.50	B320	Further prepare plan outline.
02/14/25	S. Schrag	4.00	3,852.00	B320	Further prepare motion to extend exclusivity period (1.9); conduct research in support of the same (1.5); confer with G. Miller regarding the same (.2); confer with G. Medina and C. Doherty (.2); confer with T. Moyron, S. Maizel, and G. Miller regarding the same (.2).
02/15/25	G. Miller	2.90	2,583.90	B320	Review and comment re draft motion to extend exclusivity.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/16/25	G. Miller	0.50	445.50	B320	Further prepare motion to extend exclusivity.
02/16/25	S. Schrag	0.50	481.50	B320	Review comments from G. Miller, T. Moyron, and S. Maizel to motion to extend exclusivity.
02/16/25	S. Maizel	1.00	1,125.00	B320	Review and revise motion to extend exclusivity.
02/17/25	C. Doherty, Jr.	0.20	177.30	B320	Provide comments to draft of Bar Date Motion.
02/17/25	S. Schrag	6.90	6,644.70	B320	Further prepare motion to extend exclusivity (2.5); conduct research in support of the same (2.9); further prepare order re the same (.9); confer with G. Miller regarding the same (.3); confer with T. Moyron and S. Maizel regarding the same (.3).
02/17/25	G. Miller	0.30	267.30	B320	Review and comment re motion to extend exclusivity.
02/17/25	T. Moyron	0.80	788.40	B320	Analyze and provide comments re motion to extend exclusivity.
02/17/25	T. Moyron	0.30	295.65	B320	Analyze emails re indemnification for Dr. Releford.
02/18/25	T. Moyron	0.30	295.65	B320	Zoom conference with R. Millien, D. Schumacher, and S. Maizel re indemnification issues.
02/18/25	T. Moyron	0.30	295.65	B320	Correspondence re motion to extend exclusivity.
02/18/25	T. Moyron	0.20	197.10	B320	Call with S. Maizel re motion to extend exclusivity.
02/18/25	T. Moyron	0.10	98.55	B320	Analyze emails re preparation of undertaking re indemnity.
02/18/25	G. Medina	0.30	125.55	B320	Review request from S. Schrag and file motion to extend exclusivity.
02/18/25	S. Schrag	3.40	3,274.20	B320	Review and further prepare motion to extend exclusivity period (2.3); conduct research in support of the same (.9); confer with S. Maizel regarding the same (.1); confer with G. Medina regarding the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/18/25	S. Maizel	0.10	112.50	B320	Review and respond to emails re preparation of undertaking re indemnity.
02/18/25	S. Maizel	0.30	337.50	B320	Zoom conference with R. Millien, D. Schumacher, and T. Moyron re indemnification issues.
02/18/25	S. Maizel	0.50	562.50	B320	Telephone conference with S. Schrag re extension of exclusivity motion (.3); review and respond to emails re motion to extend exclusivity (.2).
02/19/25	S. Maizel	0.40	450.00	B320	Review and revise indemnity letter for R. Millien.
02/19/25	T. Moyron	0.10	98.55	B320	Analyze correspondence re updated indemnity letter.
02/19/25	R. Garms	2.40	1,652.40	B320	Review and revise indemnity letter.
02/25/25	G. Miller	0.10	89.10	B320	Follow up with T. Moyron and S. Maizel re plan outline.
02/28/25	H. Thomas	0.20	153.90	B320	Confer with T. Moyron regarding settlement and plan issues.
02/28/25	S. Maizel	0.50	562.50	B320	Review term sheet re plan terms as provided to DOJ.
02/28/25	T. Moyron	0.50	492.75	B320	Analyze term sheet re plan terms as provided to DOJ.
	Subtotal	62.70	58,763.70		

EMP - Employment

Date	Timekeeper	Hours	Amount	Task	Narrative
02/07/25	S. McCandless	1.10	1,143.45	EMP	Review Hooper Lundy's letter to US Department of Justice regarding contractor analysis for assessment of same.
02/10/25	S. McCandless	3.40	3,534.30	EMP	Further review Hooper Lundy letter to US Department of Justice for analysis of same (.30); review and analyze Omni Healthcare v. MD Spine Solutions on which Hooper Lundy relied as authority (1.10); review relevant case history reflecting current case status and parties to Omni Healthcare vs. MD Spine Solutions (.70); provide detailed analysis of all of same to S. Maizel and T. Moyron (1.30).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/12/25	S. McCandless	0.30	311.85	EMP	Conference call with S. Alberts and T. Moyron regarding contractor issues.
02/12/25	S. Maizel	0.30	337.50	EMP	Zoom conference with S. McCandless and T. Moyron re employment issues (.2); review and respond to emails re same (.1).
	Subtotal	5.10	5,327.10		

INS - Insurance

Date	Timekeeper	Hours	Amount	Task	Narrative
02/19/25	G. Miller	0.10	89.10	INS	Review correspondence re non-renewal of insurance.
	Subtotal	0.10	89.10		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
02/03/25	S. Maizel	0.70	787.50	MED/CMS	Review correspondence from HLB and Ankura re negotiations with DOJ, etc.
02/03/25	T. Moyron	0.30	295.65	MED/CMS	Call with R. Cetrulo re DOJ inquiries and restructuring.
02/03/25	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel re WCC and other matters.
02/04/25	T. Moyron	0.40	394.20	MED/CMS	Call with A. Curtis re settlement matters (.2); analyze A. Warner email re WCC (.1); prepare email to debtor re same (.1).
02/05/25	S. Maizel	2.00	2,250.00	MED/CMS	Zoom conference with Ankura and HLB re pending negotiations with DOJ and CMS (1.0); review revised materials for DOJ from Ankura (1.0).
02/05/25	T. Moyron	2.00	1,971.00	MED/CMS	Zoom conference with Ankura and HLB re pending negotiations with DOJ and CMS (1.0); analyze revised materials for DOJ from Ankura (1.0).
02/06/25	T. Moyron	0.40	394.20	MED/CMS	Correspondence re negotiations with DOJ.
02/06/25	T. Moyron	0.10	98.55	MED/CMS	Analyze email from HLB re letter to DOJ concerning IRS-1099 clinicians.
02/06/25	S. Maizel	1.50	1,687.50	MED/CMS	Zoom with Ankura and HLB re presentation for DOJ.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/06/25	S. Maizel	0.40	450.00	MED/CMS	Review and respond to emails re negotiations with DOJ.
02/06/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to email from HLB re letter to DOJ concerning IRS-1099 clinicians.
02/06/25	T. Moyron	0.40	394.20	MED/CMS	Analyze weekly report (.1), call with I. Lee re same (.1) , email from Ankura re same (.1), and prepare email to A. Curtis attaching weekly report (.1).
02/07/25	T. Moyron	0.80	788.40	MED/CMS	Call with DOJ, D. Schumacher, Ankura, et al., re Ankura analysis and updated settlement offer.
02/07/25	S. Maizel	3.20	3,600.00	MED/CMS	Zoom conference with Ankura, DOJ, HLB attorneys, etc. re negotiations on settlement terms (2.0); zoom conference with HLB attorneys re negotiations with DOJ (.6); telephone conference with I. Lee re same (.2); review and respond to emails re same (.4).
02/10/25	T. Moyron	0.40	394.20	MED/CMS	Telephone conference with S. Maizel re updated settlement offer to DOJ (.1); analyze emails with DOJ and UST re same (.3).
02/11/25	S. Maizel	0.30	337.50	MED/CMS	Telephone conference with T. Moyron re negotiations with DOJ.
02/12/25	S. Maizel	2.70	3,037.50	MED/CMS	Zoom conference with DOJ, HLB, Ankura, etc. re CMS settlement negotiations (.5); zoom conference with HLB and Ankura re same (.9); zoom with Dr. Releford, R. Cetrullo, HLB, Ankura, etc. re same (1.0); review and respond to emails re same (.3).
02/12/25	T. Moyron	1.20	1,182.60	MED/CMS	Call with GWC, Dr. Releford, HLB, et al., re settlement numbers, follow up calls with Dr. Releford and analyze related matters.
02/13/25	S. Maizel	2.10	2,362.50	MED/CMS	Multiple telephone conference with T. Moyron re negotiations with DOJ (.4); zoom conference with HLB and Ankura re negotiations with DOJ over FCA settlement (1.2); review and respond to emails re same (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/13/25	S. Maizel	0.60	675.00	MED/CMS	Zoom conference with I. Lee and T. Moyron re negotiations with DOJ over FCA settlement (.2); multiple telephone conference with T. Moyron re same (.4).
02/13/25	T. Moyron	2.20	2,168.10	MED/CMS	Multiple telephone conferences with S. Maizel re negotiations with DOJ (.4); Zoom conference with HLB and Ankura re negotiations with DOJ over FCA settlement (1.2); review and respond to emails re same (.6).
02/13/25	T. Moyron	0.60	591.30	MED/CMS	Zoom conference with I. Lee and S. Maizel re negotiations with DOJ over FCA settlement (.2); multiple telephone conferences with S. Maizel re same (.4).
02/13/25	T. Moyron	0.40	394.20	MED/CMS	Calls with I. Lee re settlement and related calculations (.2); call with S. Maizel and I. Lee re same (.2).
02/13/25	T. Moyron	1.20	1,182.60	MED/CMS	Analyze calculations re DOJ settlement and related materials.
02/14/25	T. Moyron	4.50	4,434.75	MED/CMS	Telephone conference with S. Maizel re DOJ negotiations (.3); zoom conference with R. Cetrulo, R. Millien, Ankura, HLB, et al., negotiations with DOJ re CMS issues (.7); zoom conference with Ankura and HLB re negotiations with DOJ (.5); zoom conference with Ankura, R. Cetrulo, R. Millien, et al., re DOJ negotiations (.3); zoom conference with DOJ attorneys, Ankura, HLB, et al., re same (1.2); zoom conference with HLB and Ankura re same (.5); zoom conference with R. Cetrullo, Ankura, HLB, S. Maizel, et al., re negotiations with DOJ (.5); review and respond to emails re same (.5).
02/14/25	T. Moyron	0.30	295.65	MED/CMS	Analyze updated HHS stipulation (.2); review and respond to emails re same (.1).
02/14/25	T. Moyron	0.20	197.10	MED/CMS	Review correspondence re budget for HHS stipulation.
02/14/25	T. Moyron	0.20	197.10	MED/CMS	Analyze weekly report for DOJ.
02/14/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails re budget for HHS stipulation.

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02/14/25	S. Maizel	0.30	337.50	MED/CMS	Telephone conference with D. Grassgreen, PSZJ, re counsel for Dr. Releford (.1); email to Dr. Releford re same (.1); review and respond to emails re interviews (.1).
02/14/25	S. Maizel	0.20	225.00	MED/CMS	Review weekly report for DOJ.
02/14/25	S. Maizel	4.50	5,062.50	MED/CMS	Telephone conference with T. Moyron re DOJ negotiations (.3); zoom conference with R. Cetrulo, R. Millien, Ankura, HLB, etc. negotiations with DOJ re CMS issues (.7); zoom conference with Ankura and HLB re negotiations with DOJ (.5); zoom conference with Ankura, R. Cetrulo, R. Millien, etc. re DOJ negotiations (.3); zoom conference with DOJ attorneys, Ankura, HLB, etc. re same (1.2); zoom conference with HLB and Ankura re same (.5); zoom conference with R. Cetrullo, Ankura, HLB, T. Moyron, etc. re negotiations with DOJ (.5); review and respond to emails re same (.5).
02/14/25	S. Maizel	0.40	450.00	MED/CMS	Review and revise 3rd extension of stipulation with HHS (.2); review and respond to emails re same (.1); telephone conference with G. Miller re same (.1).
02/14/25	G. Miller	0.90	801.90	MED/CMS	Prepare extension of stipulation with DOJ and emails with A. Curtis re same.
02/17/25	T. Moyron	1.10	1,084.05	MED/CMS	Call with S. Maizel and I. Lee re budget (.5); multiple calls with S. Maizel re same (.3); review and respond to emails re same (.3).
02/19/25	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel re pending issues (.1); review and respond to emails re same (.1).
02/19/25	T. Moyron	0.30	295.65	MED/CMS	Call with Dr. Releford re settlement matters.
02/19/25	S. Maizel	0.30	337.50	MED/CMS	Telephone conference with I. Lee re analysis issues (.1); telephone conference with T. Moyron re same (.1); review and respond to emails re same (.1).
02/19/25	S. Maizel	2.00	2,250.00	MED/CMS	Review and revise outline of settlement agreement with DOJ from HLB.
02/19/25	S. Maizel	1.00	1,125.00	MED/CMS	Review and revise outline of settlement agreement with DOJ from HLB.

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02/20/25	T. Moyron	2.10	2,069.55	MED/CMS	Zoom conference with DOJ attorneys, HLB, Ankura, et al., re settlement negotiations (.6); zoom conference with HLB and Ankura, et al., re same (.4); review and respond to emails re same (.4); multiple calls with S. Maizel re same (.7).
02/20/25	S. Maizel	2.10	2,362.50	MED/CMS	Zoom conference with DOJ attorneys, HLB, Ankura, etc. re settlement negotiations (.6); zoom conference with HLB and Ankura, etc. re same (.4); review and respond to emails re same (.4); multiple telephone conference with T. Moyron re same (.7).
02/23/25	T. Moyron	1.80	1,773.90	MED/CMS	Analyze email from I. Lee re counter, excel and settlement (.2); call with I. Lee re same (1.0); call with S. Maizel and I. Lee re same (.5) and follow up call with S. Maizel (.1).
02/23/25	T. Moyron	0.70	689.85	MED/CMS	Call with S. Maizel and counsel for Dr. Releford re status, pending matters and settlement.
02/23/25	S. Maizel	3.00	3,375.00	MED/CMS	Telephone conference with B. Sun, Norton Rose, counsel for Dr. Releford re negotiations with DOJ (.8); telephone conference with B. Sun and T. Moyron re same (7); multiple telephone conferences with T. Moyron re same (.9); telephone conference with I. Lee and T. Moyron re same (.6).
02/24/25	S. Maizel	3.70	4,162.50	MED/CMS	Telephone conference with HLB attorneys, T. Moyron re negotiations with DOJ (.8); telephone conference with HLB attorneys and Ankura re negotiations with DOJ (.4); telephone conference with Dr. Releford attorneys re pending negotiations with DOJ (1.1); telephone conference with HLB attorneys, etc. re same (.3); telephone conference with R. Millien, T. Moyron, HLB attorneys, etc. (.7); review and respond to emails re negotiations with DOJ (.4).
02/24/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails re projections for CMS negotiations.
02/24/25	J. Harrington	0.10	152.10	MED/CMS	Email exchanges regarding deductibility of settlement payments.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/24/25	T. Moyron	3.70	3,646.35	MED/CMS	Call with HLB attorneys, S. Maizel re negotiations with DOJ (.8); call with HLB attorneys and Ankura re negotiations with DOJ (.4); call with Dr. Releford's attorneys re pending negotiations with DOJ (1.1); call with HLB attorneys, etc. re same (.3); telephone conference with R. Millien, S. Maizel, HLB attorneys, etc. (.7); correspondence regarding negotiations with DOJ (.4).
02/24/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence re projections for CMS negotiations.
02/25/25	J. Harrington	1.00	1,521.00	MED/CMS	Email exchanges regarding deductibility of settlement payments; prepare for and participate in call with client regarding same.
02/25/25	S. Maizel	0.60	675.00	MED/CMS	Zoom call with R. Cetrullo, R. Millien, T. Moyron, I. Lee, etc. re negotiations with DOJ over CMS claims (.5); review and respond to emails re same (.1).
02/25/25	T. Moyron	0.70	689.85	MED/CMS	Call with DOJ, HLB, including A. Curtis re settlement (.5); call with I. Lee and HLB thereafter (.2).
02/25/25	T. Moyron	0.70	689.85	MED/CMS	Call with GWC, I. Lee, et al., regarding settlement (.5) and meeting with S. Maizel thereafter (.2).
02/25/25	T. Moyron	0.50	492.75	MED/CMS	Call with R. Cetrulo, I. Lee and J. Harrington re tax matters re settlement.
02/25/25	T. Moyron	1.20	1,182.60	MED/CMS	Call with I. Lee, HLB, and S. Maizel re settlement, calculations and other matters.
02/26/25	S. Maizel	2.60	2,925.00	MED/CMS	Zoom conference with B. Sun, HLB attorneys, Ankura, T. Moyron, etc. re negotiations with DOJ (1.2); telephone conference with T. Moyron re same (.1); zoom conference with Ankura and HLB attorneys re same (.5); review and respond to emails re same from HLB, Norton Rose, etc. (.8).
02/26/25	S. Maizel	0.50	562.50	MED/CMS	Zoom conference with R. Cetrullo, etc. re tax treatment of DOJ settlement issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
02/26/25	T. Moyron	1.30	1,281.15	MED/CMS	Call with HLB, counsel for Dr. Releford, I. Lee et al. re settlement and related matters (1.1); call with HLB, I. Lee, et al., thereafter (.2).
02/26/25	T. Moyron	0.70	689.85	MED/CMS	Call with R. Cetrulo, J. Harrington, I. Lee et al., re taxes re settlement.
02/26/25	T. Moyron	1.20	1,182.60	MED/CMS	Analyze emails from I. Lee, D. Schumacher re settlement, calculations and related matters.
02/26/25	J. Harrington	1.20	1,825.20	MED/CMS	Prepare for and participate in call with client and counsel regarding deductibility of settlement payments; follow-up emails regarding same.
02/27/25	S. Maizel	2.70	3,037.50	MED/CMS	Zoom conference with J. Dewald, I. Lee, T. Moyron, HLB attorneys, etc. re negotiations with DOJ (.6); telephone conference with I. Lee re same (.2); zoom conference with DOJ attorneys, HLB attorneys, Ankura, etc. re same (.8); zoom conference with HLB attorneys and Ankura re same (.3); review and respond to emails re same (.4); multiple telephone conference with T. Moyron re same (.4).
02/27/25	T. Moyron	2.50	2,463.75	MED/CMS	Zoom conference with J. Dewald, I. Lee, S. Maizel, HLB attorneys, et al., re negotiations with DOJ (.6); zoom conference with DOJ attorneys, HLB attorneys, Ankura, et al., re same (.8); zoom conference with HLB attorneys and Ankura re same (.3); correspondence re same (.4); multiple telephone conferences with S. Maizel re same (.4).
02/28/25	G. Medina	0.50	209.25	MED/CMS	Review request from G. Miller and prepare and send Fourth extension of Stipulation regarding suspension of medicare payments (0.3); further correspond with G. Miller and file stipulation (0.2).
02/28/25	T. Moyron	1.20	1,182.60	MED/CMS	Calls I. Lee (.3) and R. Cetrulo (.2) regarding budget and related emails with Ankura, DOJ, et al. (.7).
02/28/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails from noticing agent re notice party for CMS.
02/28/25	G. Miller	0.80	712.80	MED/CMS	Prepare extension of DOJ stipulation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	78.70	83,675.25		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
J. Harrington	\$ 1,521.00	2.30	\$ 3,498.30
S. Maizel	\$ 1,125.00	60.00	\$ 67,500.00
T. Moyron	\$ 985.50	60.10	\$ 59,228.55
G. Miller	\$ 891.00	25.20	\$ 22,453.20
R. Garms	\$ 688.50	2.40	\$ 1,652.40
S. McCandless	\$ 1,039.50	4.80	\$ 4,989.60
J.A. Moe, II	\$ 904.50	9.20	\$ 8,321.40
C. Doherty, Jr.	\$ 886.50	1.30	\$ 1,152.45
S. Schrag	\$ 963.00	28.10	\$ 27,060.30
J. Margolies	\$ 396.00	1.80	\$ 712.80
H. Thomas	\$ 769.50	0.20	\$ 153.90
G. Medina	\$ 418.50	3.20	\$ 1,339.20
K.M. Howard	\$ 391.50	<u>3.50</u>	<u>\$ 1,370.25</u>
Totals		202.10	\$ 199,432.35
Less Courtesy Discount			(\$16,000.00)
Fee Total			\$183,432.35

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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	15,784.65
B160	Fee Applications/Employment Applications	26,305.20
B200	Operations	1,256.40
B260	Board of Directors Matters	745.65
B310	Claims Administration and Objections	7,485.30
B320	Plan and Disclosure Statement (including Business Plan)	58,763.70
EMP	Employment	5,327.10
INS	Insurance	89.10
MED/CMS	Medicare/CMS Issues	83,675.25
	Total Fees	\$199,432.35

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COMBINED TOTALS

Total Hours	202.10
Fee Total, all Matters	\$ 183,432.35
	<hr/>
Invoice Total, all Matters	<u>\$ 183,432.35</u>

Invoices Attached to the Fifth Monthly Fee Statement

Dentons US LLP
601 S. Figueroa Street
Suite 2500
Los Angeles, California 90017-5704

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

April 30, 2025

Invoice No. 2843216

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	165,660.18
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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

April 30, 2025

Invoice No. 2843216

For Professional Services Rendered through March 31, 2025:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
03/03/25	S. Maizel	0.20	225.00	B110	Telephone conference with T. Moyron re pending issues.
03/03/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re second PCO report being filed.
03/03/25	G. Medina	0.70	292.95	B110	Correspond with S. Maizel and draft Second PCO report and send for review (0.4); correspond with S. Richards and S. Maizel regarding reporting period (0.1); file second PCO report (0.2).
03/03/25	C. Doherty, Jr.	0.10	88.65	B110	Attention to emails regarding CMS Certificate of No Objection.
03/04/25	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to email regarding local rules.
03/04/25	T. Moyron	0.50	492.75	B110	Zoom conference with Togut attorneys, R. Cetrulo, I. Lee, S. Maizel, etc. re pending issues including WF banking relationships, etc. (.3); telephone conference with S. Maizel re same (.2).
03/04/25	T. Moyron	0.20	197.10	B110	Correspond re PCO report and fees.
03/04/25	S. Maizel	0.50	562.50	B110	Zoom conference with Togut attorneys, R. Cetrullo, I. Lee, T. Moyron, etc. re pending issues including WF banking relationships, etc. (.3); telephone conference with T. Moyron re same (.2).
03/04/25	S. Maizel	0.40	450.00	B110	Review and respond to emails re PCO report and fees.
03/04/25	S. Maizel	0.10	112.50	B110	Review and respond to emails re PCO report and fees.
03/04/25	G. Miller	0.50	445.50	B110	Call with A. Glaubach, K. Ortiz, R. Cetrulo, and T. Moyron re bank accounts.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/04/25	T. Moyron	0.60	591.30	B110	Call with S. Maizel re pending issues (.2); correspondence regarding bar date motion (.2); correspondence regarding PCO report (.2).
03/05/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re filing POC fee statement (.1); telephone conference with C. Doherty re same (.1).
03/05/25	T. Moyron	0.20	197.10	B110	Analyze emails from S. Maizel, et al., re PCO fees.
03/05/25	C. Doherty, Jr.	0.10	88.65	B110	Attention to email concerning UST request.
03/06/25	S. Maizel	0.60	675.00	B110	Zoom conference with T. Moyron re pending issues (.2); zoom conference with R. Cetrulo, K. Manning, I. Lee, R. Millien, etc. re pending issues (.4).
03/06/25	S. Maizel	0.30	337.50	B110	Review correspondence re credentialling issues.
03/07/25	T. Moyron	0.40	394.20	B110	Call with R. Millien and S. Maizel re case matters.
03/07/25	T. Moyron	0.60	591.30	B110	Zoom conference re Ankura compensation issues (.4); analyze and respond to emails re same (.2).
03/07/25	C. Doherty, Jr.	0.10	88.65	B110	Attention to email from United States Trustee.
03/11/25	S. Maizel	0.50	562.50	B110	Office conference with T. Moyron and I. Lee re pending issues.
03/11/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re banking relationship issues.
03/11/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re CRO employment issues.
03/11/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re March budget issues.
03/11/25	S. Maizel	0.20	225.00	B110	Review and respond to emails re WP tax obligations.
03/11/25	T. Moyron	0.60	591.30	B110	Analyze email from R. Millien re employee matters (.1); correspond with G. Miller re draft communication (.2); analyze proposed email and further prepare (.2); prepare email to R. Millien re draft email re employees (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/11/25	T. Moyron	0.50	492.75	B110	Office conference with S. Maizel and I. Lee re pending issues.
03/11/25	T. Moyron	0.20	197.10	B110	Correspondence re CRO employment matters.
03/11/25	T. Moyron	0.20	197.10	B110	Correspondence regarding WP tax obligations.
03/11/25	T. Moyron	0.20	197.10	B110	Correspondence regarding banking relationships.
03/13/25	T. Moyron	0.30	295.65	B110	Daily Huddle with R. Cetrulo, I. Lee, et al., re pending matters.
03/14/25	S. Maizel	0.10	112.50	B110	Telephone conference with T. Moyron re pending issues.
03/14/25	T. Moyron	2.20	2,168.10	B110	Analyze pending matters including correspondence.
03/14/25	T. Moyron	0.10	98.55	B110	Call with S. Maizel re pending issues.
03/16/25	S. Maizel	0.30	337.50	B110	Telephone conference with T. Moyron re pending issues.
03/17/25	G. Miller	0.20	178.20	B110	Emails with C. Doherty and T. Moyron re CNOs.
03/17/25	S. Schrag	0.30	288.90	B110	Confer with T. Moyron regarding upcoming deadlines and discussions with US Trustee.
03/17/25	T. Moyron	0.50	492.75	B110	Multiple calls with S. Maizel re DOJ settlement matters.
03/17/25	C. Doherty, Jr.	0.40	354.60	B110	Review docket and draft email regarding local procedure and entry of orders (.2); discuss complex rules with G. Miller and draft analysis concerning plan rules (.2).
03/18/25	T. Moyron	0.70	689.85	B110	Daily Huddle with R. Cetrulo, J. Harrington, et al. re settlement matters and other issues.
03/19/25	T. Moyron	1.50	1,478.25	B110	Zoom conference with HLB, S. Maizel, et al. re CMS negotiations (.3); zoom conference with DOJ attorneys, HLB, including D. Schumacher, et al., re claims re CMS (1.0); correspondence re same (.2).
03/20/25	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to emails regarding local rules and deadlines in case.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/20/25	T. Moyron	0.20	197.10	B110	Meeting with I. Lee, R. Cetrulo, et al., re pending matters and DOJ settlement.
03/24/25	S. Alberts	0.50	553.50	B110	Conference with T. Moyron about garnishment duties, conduct confirmatory research and draft and send response.
03/24/25	T. Moyron	0.20	197.10	B110	Call with R. Millien regarding various matters, including status of settlement, go-forward proposed structure, and plan.
03/24/25	T. Moyron	0.40	394.20	B110	Analyze email from K. Manning re employee related question (.1); analyze issues (.2) and prepare email re same (.1).
03/24/25	D. Cook	1.20	1,026.00	B110	Research concerning effect of garnishment order in bankruptcy proceeding (1.0); telephone conferences with S. Alberts concerning same (.2).
03/24/25	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to emails regarding local rules and deadlines in case (.1); call with J. Moe regarding case and local practice (.1).
03/25/25	S. Schrag	0.20	192.60	B110	Confer with T. Moyron regarding proposed orders.
03/25/25	C. Doherty, Jr.	0.30	265.95	B110	Prepare analysis regarding local rules concerning pending motions.
03/26/25	C. Doherty, Jr.	1.00	886.50	B110	Review and respond to emails regarding local procedures (.2); review precedent concerning motion to approve combined plan and disclosure statement and discuss same with G. Miller (.5); prepare COC for pending application (.2); call with G. Miller regarding plan motion (.1).
03/26/25	S. Maizel	0.10	112.50	B110	Review and respond to email re PCO invoices.
03/26/25	G. Miller	0.10	89.10	B110	Emails with S. Schrag re CNOs.
03/27/25	C. Doherty, Jr.	0.30	265.95	B110	Review and respond to emails concerning motions and Certificates of Conference (.2); revise certificate of conference for application (.1).
03/28/25	C. Doherty, Jr.	3.20	2,836.80	B110	Prepare and supervise filing of Certificate of Counsel (.2); prepare motion regarding joint plan and disclosure statement (3.0).

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/28/25	G. Miller	0.30	267.30	B110	Review draft OCP motion and related correspondence and email T. Moyron re same.
03/30/25	S. Maizel	0.20	225.00	B110	Zoom conference with Togut attorneys and T. Moyron re Wells Fargo banking issues.
03/30/25	S. Maizel	0.20	225.00	B110	Telephone conference with T. Moyron re pending issues.
03/31/25	C. Doherty, Jr.	2.80	2,482.20	B110	Prepare motion for joint plan and disclosure statement.
	Subtotal	27.70	26,484.75		

B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
03/03/25	G. Medina	0.40	167.40	B160	Correspond and call with J. Moe regarding service of fee application (0.2); correspond with Verita and send new addressees for Global Wound Care and General Counsel (0.2).
03/06/25	T. Moyron	0.40	394.20	B160	Call with S. Maizel and I. Lee re professional fees (.2); correspondence with R. Cetrulo, etc. re same (.2).
03/06/25	S. Maizel	0.50	562.50	B160	Telephone conference with T. Moyron and I. Lee re professional fees (.2); telephone conference with I. Lee re same (.1); review and respond to emails from R. Cetrulo, etc. re same (.2).
03/06/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re preparation of third monthly fee statement.
03/07/25	S. Maizel	1.00	1,125.00	B160	Zoom conference re Ankura compensation issues (.4); telephone conference with T. Moyron and R. Millien re professional compensation issues (.4); review and respond to emails re same (.2).
03/11/25	S. Maizel	0.20	225.00	B160	Review and respond to emails from I. Lee re interim fee application for Ankura.
03/15/25	S. Maizel	0.10	112.50	B160	Review and respond to emails re payment on second monthly fee statement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/26/25	S. Schrag	0.40	385.20	B160	Confer with G. Miller regarding CNO for Interim Fee Application (.2); confer with T. Moyron and G. Miller regarding CNO (.1); confer with C. Doherty regarding the same (.1).
03/27/25	S. Schrag	0.10	96.30	B160	Review material re CNO for First Interim Fee Application.
03/28/25	T. Moyron	0.30	295.65	B160	Analyze CNO re Dentons Fee Application (.1); correspond regarding same with C. Doherty, et al. (.2).
03/28/25	D. Thomas-Nichols	0.70	296.10	B160	Prepare redline against filed proposed order in first initial fee application vs. revised proposed order (.2); correspond with C. Doherty with redline (.1); revise certificate of counsel (.2); file with court certificate of counsel (.1); correspond with team with filed certificate of counsel (.1).
03/31/25	T. Moyron	0.20	197.10	B160	Attention to Ankura fee statements and filing of monthly fee statements.
03/31/25	G. Miller	0.60	534.60	B160	Review January and February monthly fee invoices and email T. Moyron and S. Maizel re same.
03/31/25	G. Miller	0.50	445.50	B160	Prepare Ankura monthly fee application.
	Subtotal	5.50	4,949.55		

B190 - Other Contested Matters (excluding Assumption/Rejection Moti

Date	Timekeeper	Hours	Amount	Task	Narrative
03/30/25	T. Moyron	0.20	197.10	B190	Call with K. Ortiz, et al., re Wells Fargo and next steps.
03/31/25	T. Moyron	0.20	197.10	B190	Correspond with A. Curtis, et al, regarding meeting re Wells Fargo.
03/31/25	T. Moyron	0.20	197.10	B190	Correspond with I. Lee re account and timing of changing accounts and impact on deposits of receivables and bankruptcy example.
	Subtotal	0.60	591.30		

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B240 - Tax Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
03/18/25	J. Harrington	0.30	456.30	B240	Participate in call with client to discuss deductibility of payments.
03/19/25	S. Maizel	0.20	225.00	B240	Review and respond to emails re correspondence from Washington State tax authority.
	Subtotal	0.50	681.30		

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
03/28/25	G. Miller	1.10	980.10	B300	Further prepare settlement agreement with Wound Pros.
	Subtotal	1.10	980.10		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
03/03/25	T. Moyron	0.20	197.10	B310	Correspond with C. Doherty, et al. re bar date motion.
03/03/25	G. Miller	0.90	801.90	B310	Follow up with T. Moyron and S. Maizel re certification of counsel re bar date motion (.2); further prepare certification of counsel (.5); email A. Curtis re same (.2).
03/03/25	S. Maizel	0.20	225.00	B310	Review and respond to emails re order on bar date motion.
03/05/25	T. Moyron	0.30	295.65	B310	Analyze certificate of counsel (.1) and correspond with G. Miller, et al., re same (.2).
03/05/25	S. Maizel	0.70	787.50	B310	Review and respond to emails re COC on bar date motion (.3); review and revise same (.4).
03/05/25	G. Miller	0.20	178.20	B310	Follow up with A. Curtis re certificate of counsel re bar date order.
03/05/25	G. Miller	1.40	1,247.40	B310	Finalize certificate of counsel and file same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/05/25	G. Medina	1.10	460.35	B310	Assist G. Miller assemble certificate of counsel and exhibits with respect to the Bar Date (0.4); correspond with G. Miller and assemble revised certificate of counsel and exhibits with respect to the Bar Date (0.4); edit and file certificate of counsel with respect to the Bar Date (0.3).
03/06/25	G. Miller	0.30	267.30	B310	Review finalized bar date notice and publication notice.
03/06/25	S. Maizel	0.20	225.00	B310	Review and respond to emails re service of bar date notice.
03/06/25	S. Schrag	1.80	1,733.40	B310	Review correspondence from M. Villa regarding bar date motion (.2); prepare notice for publication (.6); prepare bar date notice (.6); confer with G. Miller regarding the same (.2); confer with T. Moyron regarding the same (.2).
03/07/25	S. Maizel	0.20	225.00	B310	Review and respond to emails re service issues related to bar date notice.
03/10/25	S. Maizel	0.40	450.00	B310	Review and respond to emails re publication notice of bar date.
03/10/25	S. Schrag	0.20	192.60	B310	Review Bar Date Publication Notices (.1); confer with T. Moyron and G. Miller regarding the same (.1).
03/10/25	G. Miller	0.40	356.40	B310	Review publication notice proofs.
03/10/25	T. Moyron	0.30	295.65	B310	Attention to publication notice of bar date and related emails.
03/11/25	G. Miller	1.10	980.10	B310	Draft communication to employees re bar date notice and email T. Moyron re same.
03/11/25	S. Maizel	0.30	337.50	B310	Review and respond to emails from R. Millien re employee communication re bar date notice.
03/26/25	G. Medina	1.20	502.20	B310	Review request from T. Moyron and retrieve and organize claims filed (1.0); correspond with Verita regarding claims register for claims filed (0.2).
	Subtotal	11.40	9,758.25		

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B320 - Plan and Disclosure Statement (including Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
03/05/25	S. Maizel	1.00	1,125.00	B320	Analyze options re restructuring plan.
03/06/25	S. Maizel	0.80	900.00	B320	Analyze potential restructuring options.
03/06/25	T. Moyron	0.70	689.85	B320	Analyze restructuring options.
03/07/25	H. Thomas	3.30	2,539.35	B320	Research into sale of for-profit medical corporation assets as part of a Plan of Reorganization or 363 sale, per T. Moyron instruction.
03/07/25	T. Moyron	0.40	394.20	B320	Analyze plan issues (.3); call with H. Thomas re same (.1).
03/10/25	S. Maizel	1.00	1,125.00	B320	Analyze options re restructuring plans.
03/10/25	H. Thomas	0.90	692.55	B320	Research into sale of for-profit medical corporation assets as part of a Plan of Reorganization or 363 sale, per T. Moyron instruction.
03/10/25	G. Miller	0.30	267.30	B320	Emails with T. Moyron re Plan Summary.
03/10/25	T. Moyron	1.30	1,281.15	B320	Analyze options re restructuring plans.
03/11/25	H. Thomas	1.20	923.40	B320	Research into sale of for-profit medical corporation assets as part of a Plan of Reorganization or 363 sale, per T. Moyron instruction.
03/12/25	H. Thomas	1.00	769.50	B320	Research into sale of for-profit medical corporation assets as part of a Plan of Reorganization or 363 sale, per T. Moyron instruction.
03/17/25	T. Moyron	0.60	591.30	B320	Call with G. Miller, et al., regarding plan, including terms related to corporate structure (.3); analyze related documents (.3).
03/17/25	S. Maizel	0.60	675.00	B320	Telephone conference with T. Moyron, etc. re preparation of disclosure statement and plan (.2); review emails re preparation of plan (.2); review term sheet re plan (.2).
03/17/25	H. Thomas	0.30	230.85	B320	Confer with T. Moyron, S. Maizel, and G. Miller regarding issues surrounding Plan and Disclosure Statement.
03/17/25	G. Miller	0.10	89.10	B320	Call with C. Doherty re combined plan and disclosure statement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/17/25	G. Miller	0.50	445.50	B320	Call with T. Moyron and H. Thomas re plan structure.
03/18/25	H. Thomas	2.10	1,615.95	B320	Research into Plans and Disclosure Statements where debtors have restructured and amended corporate structure or the board or corporate policies.
03/24/25	S. Maizel	1.00	1,125.00	B320	Review and analyze issues re draft plan.
03/25/25	G. Miller	0.40	356.40	B320	Emails with T. Moyron re plan of reorganization.
03/25/25	T. Moyron	0.90	886.95	B320	Attention to plan and next steps (.8) and correspond with G. Miller re structure (.1).
03/25/25	S. Schrag	0.20	192.60	B320	Confer with T. Moyron regarding drafting plan (.1); review material in support of plan (.1).
03/25/25	H. Thomas	0.20	153.90	B320	Correspondence regarding research on Plan draft and settlement motion.
03/26/25	T. Moyron	0.80	788.40	B320	Conference call with R. Cetrulo, R. Millien, et al., re plan matters, including feasibility.
03/26/25	T. Moyron	0.70	689.85	B320	Analyze plan matters, including feasibility and sections regarding settlement and corporate structure.
03/26/25	T. Moyron	0.50	492.75	B320	Call with I. Lee regarding DOJ settlement and plan of reorganization.
03/26/25	G. Miller	0.80	712.80	B320	Call with GWC re plan.
03/26/25	G. Miller	1.20	1,069.20	B320	Review sample plans and circulate same to T. Moyron and S. Schrag.
03/26/25	G. Miller	0.90	801.90	B320	Call with T. Moyron and S. Schrag re plan (.4); Call with C. Doherty re same (.3); Call with T. Moyron re same (.2).
03/26/25	S. Schrag	3.10	2,985.30	B320	Confer with T. Moyron and G. Miller regarding plan and related matters (.4); begin drafting Combined Plan and Disclosure Statement (2.7).
03/27/25	S. Schrag	4.60	4,429.80	B320	Prepare Combined Plan and Disclosure statement.
03/28/25	S. Schrag	5.60	5,392.80	B320	Prepare Combined Plan and Disclosure statement.
03/28/25	T. Moyron	0.40	394.20	B320	Analyze plan matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/28/25	T. Moyron	0.20	197.10	B320	Analyze emails from C. Doherty, et al., regarding third-party releases and recent case law in S.D. Tex.
03/28/25	T. Moyron	0.40	394.20	B320	Call with I. Lee regarding weekly budget and projections (.2); correspond regarding projections and timing re DOJ (.2).
03/30/25	S. Maizel	0.50	562.50	B320	Zoom conference with T. Moyron and S. Schrag re preparation of plan of reorganization.
03/30/25	T. Moyron	0.60	591.30	B320	Call with S. Schrag and S. Maizel re plan terms, including treatment of claims, and implementation of plan.
03/30/25	T. Moyron	0.70	689.85	B320	Analyze plan terms including terms regarding treatment of claims, implementation of plan, and releases.
03/30/25	S. Schrag	0.70	674.10	B320	Confer with T. Moyron and S. Maizel regarding plan and disclosure statement.
	Subtotal	40.50	37,935.90		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
03/01/25	S. Maizel	0.20	225.00	MED/CMS	Review and respond to emails re notice to CMS.
03/04/25	S. Maizel	0.20	225.00	MED/CMS	Review and respond to emails re credentialing issues with CMS.
03/04/25	T. Moyron	0.10	98.55	MED/CMS	Review and respond to emails re credentialing issues with CMS.
03/05/25	T. Moyron	0.20	197.10	MED/CMS	Correspond with Dr. Releford's counsel, et al., re meeting.
03/05/25	S. Maizel	1.00	1,125.00	MED/CMS	Review and analyze potential settlement terms re DOJ settlement.
03/06/25	H. Thomas	0.10	76.95	MED/CMS	Confer with T. Moyron regarding 9019 Motion and related research.
03/06/25	S. Maizel	1.30	1,462.50	MED/CMS	Zoom conference with Norton Rose attorneys, HLB attorneys, etc. settlement negotiations with DOJ (.8); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/06/25	S. Maizel	0.20	225.00	MED/CMS	Review correspondence re checks from Medicare.
03/06/25	T. Moyron	0.30	295.65	MED/CMS	Review correspondence re credentialing issues.
03/06/25	T. Moyron	1.30	1,281.15	MED/CMS	Zoom conference with Norton Rose attorneys, HLB attorneys, et al., settlement negotiations with DOJ (.8); telephone conference with S. Maizel re same (.2); review and respond to emails re same (.3).
03/06/25	T. Moyron	0.60	591.30	MED/CMS	Zoom conference with S. Maizel re pending issues (.2); zoom conference with R. Cetrulo, K. Manning, I. Lee, R. Millien, etc. re pending issues (.4).
03/07/25	T. Moyron	0.20	197.10	MED/CMS	Call with D. Schumacher and S. Maizel re negotiations with DOJ.
03/07/25	T. Moyron	1.50	1,478.25	MED/CMS	Meeting with DOJ, D. Schumacher, et al., regarding DOJ's counter and settlement (.5); follow-up meeting with D. Schumacher, et al., regarding meeting with DOJ and proposed settlement (.5); calls with I. Lee regarding settlement and related matters (.5).
03/07/25	S. Maizel	1.00	1,125.00	MED/CMS	Telephone conference with D. Schumacher and T. Moyron re negotiations with DOJ (.2); zoom conference with DOJ attorneys, HLB attorneys, T. Moyron, etc. re same (.2); telephone conference with HLB attorneys re same (.3); review and respond to emails re same (.3).
03/10/25	S. Maizel	2.30	2,587.50	MED/CMS	Zoom conference with Hooper Lundy and Norton Rose attorneys re negotiations with DOJ (1.4); multiple telephone conference with T. Moyron re same (.7); review and respond to emails re same (.2).
03/10/25	S. Maizel	0.50	562.50	MED/CMS	Review emails re negotiations of settlement terms with DOJ.
03/10/25	H. Thomas	1.30	1,000.35	MED/CMS	Draft Rule 9019 Motion per T. Moyron instruction.
03/10/25	T. Moyron	0.40	394.20	MED/CMS	Analyze correspondence re negotiations of settlement terms with DOJ.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/10/25	T. Moyron	2.30	2,266.65	MED/CMS	Zoom conference with Hooper Lundy and Norton Rose attorneys re negotiations with DOJ (1.4); multiple telephone conference with S. Maizel re same (.7); review and respond to emails re same (.2)
03/11/25	T. Moyron	0.30	295.65	MED/CMS	I. Lee, et al., re correspondence re financial report for DOJ.
03/11/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence with N. Rose re settlement and information.
03/11/25	H. Thomas	2.10	1,615.95	MED/CMS	Draft Rule 9019 Motion per T. Moyron instruction.
03/11/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails re information for Norton Rose.
03/11/25	S. Maizel	1.20	1,350.00	MED/CMS	Zoom conference with HLB attorneys, R. Millien, etc. re negotiations with DOJ (.6); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.4).
03/11/25	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails from I. Lee re GWC weekly financial report for DOJ.
03/11/25	S. Maizel	0.40	450.00	MED/CMS	Review and respond to emails re Norton Rose communications.
03/11/25	T. Moyron	0.20	197.10	MED/CMS	Call with I. Lee re settlement and related matters.
03/11/25	T. Moyron	0.30	295.65	MED/CMS	Call with R. Millien re settlement and related matters.
03/11/25	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel re settlement, chapter 11 and related matters.
03/12/25	J. Harrington	0.30	456.30	MED/CMS	Respond to questions regarding tax distributions from S corporation.
03/12/25	T. Moyron	0.90	886.95	MED/CMS	Call with R. Cetrulo, K. Manning, I. Lee, D. Schumacher, et al., re settlement and counter.
03/12/25	T. Moyron	0.50	492.75	MED/CMS	Call with K. Manning re settlement and related matters.
03/12/25	T. Moyron	0.70	689.85	MED/CMS	Meeting with HLB, Norton Rose, including D. Schumacher, B. Sun re settlement matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/12/25	H. Thomas	0.50	384.75	MED/CMS	Draft Rule 9019 Motion per T. Moyron instruction.
03/12/25	S. Maizel	2.70	3,037.50	MED/CMS	Zoom conference with HLB attorneys, Norton Rose attorneys, etc. re negotiations with DOJ re CMS claim (.7); telephone conference with D. Schumacher and T. Moyron re same (.4); telephone conference with T. Moyron re same (.1); telephone conference with R. Cetrullo, HLB attorneys, etc. re same (.9); telephone conference with T. Moyron re same (.1); review and respond to emails re same (.5).
03/13/25	S. Maizel	0.60	675.00	MED/CMS	Telephone conference with DOJ, HLB, Ankura, etc. re negotiations over CMS issues (.5); review and respond to emails re same (.1).
03/13/25	T. Moyron	0.50	492.75	MED/CMS	Meeting with DOJ, D. Schumacher, et al., re counter offer and settlement.
03/13/25	G. Miller	0.10	89.10	MED/CMS	Follow up with T. Moyron re expiration of DOJ stipulation.
03/13/25	G. Miller	0.60	534.60	MED/CMS	Prepare stipulation extending DOJ stipulation.
03/13/25	T. Moyron	0.60	591.30	MED/CMS	Analyze emails from I. Lee, et al., and attachment re weekly reporting (.3) and connect with I. Lee re same and related issues (.3).
03/13/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence with I. Lee, et al. re operating budget.
03/14/25	T. Moyron	0.70	689.85	MED/CMS	Call with R. Cetrulo, A. Curtis, et al., regarding claims submitted without modified and related matters, checks, etc. (.4) and related correspondence from Wound Pros, R. Cetrulo, et al. (.3).
03/14/25	T. Moyron	0.90	886.95	MED/CMS	Analyze and stipulation and redline and finalize same (.3); correspondence from A. Curtis re same (.2); correspond with G. Miller, et al., re same and filing (.4); correspond with I. Lee re budget (.1).
03/14/25	T. Moyron	0.10	98.55	MED/CMS	Correspond with A. Curtis re meeting to discuss pending issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/14/25	G. Miller	0.30	267.30	MED/CMS	Further prepare extension of DOJ stipulation and arrange for filing of same.
03/14/25	G. Medina	0.50	209.25	MED/CMS	Correspond with G. Miller regarding filing (0.1); prepare and file send joint notice of extension of stipulation and agreed order regarding suspension of medicare payments (0.4).
03/17/25	T. Moyron	1.30	1,281.15	MED/CMS	Call with DOJ, D. Schumacher, et al., re DOJ's response to counter (.4); prepare email thereafter to D. Schumacher (.1); follow up call with D. Schumacher, I. Lee, et al. re DOJ issues raised and next steps (.3); analyze emails from D. Schumacher re restitution, de-brief and call with company (.3); call with R. Cetrulo and S. Maizel re DOJ call and points raised (.2).
03/17/25	S. Maizel	3.00	3,375.00	MED/CMS	Review and respond to emails re negotiations with DOJ in preparation for zoom conference with DOJ (.3); zoom conference with DOJ attorneys, HLB, Ankura, etc. re negotiations over CMS claims (.4); telephone conference with HLB attorneys re same (.1); zoom conference with HLB attorneys, T. Moyron, Ankura re same (.6); telephone conference with I. Lee re same (.1); review and respond to emails re same (.5); multiple telephone conferences with T. Moyron re same (.5); review and respond to emails from Norton Rose re negotiations with DOJ (.5).
03/18/25	S. Maizel	2.40	2,700.00	MED/CMS	Zoom conference with R. Cetrullo, R. Millien, HLB attorneys, etc. re negotiations with DOJ over CMS issues (.8); zoom conference with HLB attorneys, Norton Rose attorneys, etc. re same (1.1); multiple telephone conference with T. Moyron re same (.2); review and respond to emails re same (.3).
03/18/25	T. Moyron	0.80	788.40	MED/CMS	Call with D. Schumacher, R. Cetrulo, et al., and correspondence thereafter re de-brief on call with DOJ, restitution and points regarding Dr. Releford and related matters.
03/18/25	T. Moyron	0.10	98.55	MED/CMS	Call with R. Cetrulo re settlement matters.
03/18/25	T. Moyron	0.10	98.55	MED/CMS	Call with C. Oppenheim re settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/18/25	T. Moyron	1.10	1,084.05	MED/CMS	Call with Dr. Releford's counsel, D. Schumacher, et al., re settlement.
03/19/25	S. Maizel	1.60	1,800.00	MED/CMS	Zoom conference with HLB attorneys and T. Moyron re CMS negotiations (.3); follow up call with C. Schumacher, HLB, re same (.1); zoom conference with DOJ attorneys, etc. re negotiations over CMS claims (1.0); review and respond to emails re same (.2).
03/20/25	T. Moyron	1.00	985.50	MED/CMS	Zoom conference with Norton Rose, Hooper Lundy & Bookman, etc. re negotiations with DOJ (.7); telephone conference with S. Maizel re same (.2); telephone conference with I. Lee re same (.1).
03/20/25	S. Maizel	1.00	1,125.00	MED/CMS	Zoom conference with Norton Rose, Hooper Lundy & Bookman, etc. re negotiations with DOJ (.7); telephone conference with T. Moyron re same (.2); telephone conference with I. Lee re same (.1).
03/20/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails re service on CMS.
03/20/25	S. Maizel	0.10	112.50	MED/CMS	Review and respond to emails re DOJ budget issues.
03/21/25	G. Miller	0.40	356.40	MED/CMS	Prepare stipulation extending DOJ settlement and file same.
03/21/25	T. Moyron	0.80	788.40	MED/CMS	Call with DOJ, D. Schumacher, et al., re settlement and discussion regarding economics and remaining open terms (.5); call with D. Schumacher, et al., regarding same (.2); follow up call with I. Lee and S. Maizel re same (.1).
03/21/25	T. Moyron	0.40	394.20	MED/CMS	Analyze correspondence from I. Lee, R. Cetrulo, D. Schumacher re settlement.
03/21/25	T. Moyron	0.40	394.20	MED/CMS	Correspondence with I. Lee, A. Curtis, et al., re budget.
03/21/25	T. Moyron	0.20	197.10	MED/CMS	Analyze budget.
03/21/25	T. Moyron	1.20	1,182.60	MED/CMS	Attention to extended stipulation, proposed timing, finalization and filing of same.
03/21/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence with A. Curtis, et al. re stipulation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/21/25	S. Maizel	1.50	1,687.50	MED/CMS	Zoom conference DOJ attorneys, HLB attorneys, etc. re negotiations with CMS (.5); telephone conference with HLB attorneys re same (.2); telephone conference with I. Lee re same (.1); telephone conference with R. Millien, T. Moyron, etc. re same (.6); review and respond to emails re same (.1).
03/21/25	G. Medina	0.30	125.55	MED/CMS	Review request from G. Miller and prepare and file Sixth extension of stipulation and agreed order regarding suspension of medicare payments to the debtor by the United States Department of Health and Human Services.
03/21/25	S. Maizel	0.70	787.50	MED/CMS	Telephone conference with T. Moyron re pending issues.
03/21/25	T. Moyron	0.90	886.95	MED/CMS	Call with B. Sun, D. Schumacher et al. and emails regarding settlement.
03/24/25	S. Maizel	1.00	1,125.00	MED/CMS	Review and analyze issues re negotiations with DOJ/CMS.
03/24/25	S. Maizel	0.50	562.50	MED/CMS	Teams conference call with Norton Rose, etc. re negotiations with DOJ (.3); review and respond to emails re same (.2).
03/24/25	T. Moyron	0.50	492.75	MED/CMS	Call with B. Sun, D. Schumacher, et al., re calls with DOJ and settlement.
03/25/25	G. Miller	1.60	1,425.60	MED/CMS	Prepare 9019 motion to approve DOJ settlement.
03/25/25	T. Moyron	0.40	394.20	MED/CMS	Coordinate 9019 motion and correspondence regarding settlement agreement.
03/25/25	S. Maizel	0.30	337.50	MED/CMS	Multiple telephone conferences with T. Moyron re negotiations with CMS/DOJ.
03/25/25	T. Moyron	1.20	1,182.60	MED/CMS	Conference call with DOJ, including J. Bergin, D. Thiess, et al., HLB, et al. re settlement discussions (.7); call with HLB, including D. Schumacher, I. Lee, et al., re post-DOJ discussion (.2); calls with S. Maizel re negotiations and related matters (.3).
03/26/25	G. Miller	2.20	1,960.20	MED/CMS	Further prepare motion to approve DOJ settlement agreement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/26/25	T. Moyron	0.40	394.20	MED/CMS	Call with J. Dewald and D. Schumacher regarding upcoming DOJ meeting.
03/26/25	S. Maizel	0.50	562.50	MED/CMS	Telephone conference with Ankura, WP, HLB attorneys, etc. re negotiations with DOJ/CMS (.3); telephone conference with T. Moyron re same (.2).
03/27/25	S. Maizel	3.50	3,937.50	MED/CMS	Zoom conference with Norton Rose attorneys, HLB attorneys, etc. re negotiations with CMS/DOJ (.5); zoom conference with Dr. Releford, R. Certulo, Norton Rose attorneys, Hooper, Lundy attorneys, Ankura, etc. re negotiations with DOJ/CMS (.5); zoom conference with DOJ, HLB attorneys, etc. re same (1.1); telephone conference with I. Lee and T. Moyron re same (.2); zoom conference with HLB, etc. re same (.5); telephone conference with T. Moyron re same (.1); review and respond to emails re same (.6).
03/27/25	G. Miller	0.40	356.40	MED/CMS	Prepare settlement agreement with Wound Pros.
03/27/25	G. Miller	0.70	623.70	MED/CMS	Further prepare motion to approve DOJ settlement and email T. Moyron re same.
03/27/25	G. Miller	2.60	2,316.60	MED/CMS	Prepare motion to approve Wound Pros settlement.
03/27/25	T. Moyron	0.50	492.75	MED/CMS	Call with R. Cetrulo, J. Sun, et al., regarding upcoming call with DOJ and settlement.
03/27/25	T. Moyron	0.50	492.75	MED/CMS	Call with R. Cetrulo, K. Manning, Norton Rose, D. Schumacher et al., re settlement and post discussion with DOJ.
03/27/25	T. Moyron	1.10	1,084.05	MED/CMS	Call with DOJ, including A. Curtis, J. Bergin, et al., regarding settlement, including settlement number, matters related to year one, etc.
03/27/25	T. Moyron	0.20	197.10	MED/CMS	Call with I. Lee and S. Maizel regarding points raised by DOJ related to settlement and year one re settlement.
03/27/25	T. Moyron	0.50	492.75	MED/CMS	Call with Norton Rose including B. Sun, D. Schumacher, et al., re settlement and upcoming call with DOJ.

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/27/25	T. Moyron	0.30	295.65	MED/CMS	Correspondence with HLB, et al., regarding settlement terms and upcoming DOJ meeting.
03/28/25	G. Miller	0.40	356.40	MED/CMS	Prepare further extension of DOJ stipulation.
03/28/25	S. Maizel	1.00	1,125.00	MED/CMS	Telephone conference with T. Moyron re negotiations with CMS/DOJ (.5); review and respond to emails from Ankura, etc. re budget for DOJ discussions, etc. (.5).
03/28/25	T. Moyron	0.40	394.20	MED/CMS	Correspond regarding draft notice and stipulation (.2); analyze timing and proposed timing thereof (.2).
03/30/25	T. Moyron	0.60	591.30	MED/CMS	Analyze 9019 motions to approve settlement agreements.
03/30/25	S. Maizel	1.00	1,125.00	MED/CMS	Review and respond to email from R. Cetrulo re CMS recoupment issues.
03/31/25	T. Moyron	1.20	1,182.60	MED/CMS	Call with DOJ, S. Schumacher, et al., regarding settlement, economic, and various options and terms related to payment.
03/31/25	T. Moyron	0.50	492.75	MED/CMS	Call with R. Cetrulo, I. Lee, D. Schumaker, et al., regarding calculations re settlement.
03/31/25	T. Moyron	0.40	394.20	MED/CMS	Analyze emails from I. Lee, et al., re calculations and excel re settlement.
03/31/25	T. Moyron	1.10	1,084.05	MED/CMS	Analyze updated notice of extended stipulation (.1); correspond with G. Miller regarding timing (.2); analyze budget (.2); call with A. Warner regarding timing and extension of stipulation (.1); prepare email regarding timing and update to stipulation and responses thereto (.2); analyze emails from G. Miller, A. Warner, et al., re finalization and filing (.3).
03/31/25	S. Maizel	2.40	2,700.00	MED/CMS	Zoom conference with HLB attorneys, etc. re negotiations with DOJ over CMS claim (.4); multiple telephone conference with T. Moyron re same (.3); zoom conference with DOJ attorneys, HLB attorneys, Ankura, etc. re same (1.2); review and respond to emails re same (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
03/31/25	G. Miller	0.70	623.70	MED/CMS	Further prepare motion to approve DOJ settlement.
03/31/25	G. Miller	0.40	356.40	MED/CMS	Prepare and file stipulation extending DOJ stipulation.
03/31/25	G. Medina	0.40	167.40	MED/CMS	Prepare and assemble seventh extension of stipulation and send to G. Miller for review (0.2); file joint notice of extension regarding suspension of Medicare payments (0.2).
	Subtotal	80.50	81,541.80		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
J. Harrington	\$ 1,521.00	0.60	\$ 912.60
S. Alberts	\$ 1,107.00	0.50	\$ 553.50
S. Maizel	\$ 1,125.00	46.50	\$ 52,312.50
T. Moyron	\$ 985.50	52.60	\$ 51,837.30
G. Miller	\$ 891.00	22.20	\$ 19,780.20
C. Doherty, Jr.	\$ 886.50	8.70	\$ 7,712.55
D. Cook	\$ 855.00	1.20	\$ 1,026.00
S. Schrag	\$ 963.00	17.20	\$ 16,563.60
H. Thomas	\$ 769.50	13.00	\$ 10,003.50
D. Thomas-Nichols	\$ 423.00	0.70	\$ 296.10
G. Medina	\$ 418.50	<u>4.60</u>	<u>\$ 1,925.10</u>
Totals		167.80	\$ 162,922.95

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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	26,484.75
B160	Fee Applications/Employment Applications	4,949.55
B190	Other Contested Matters (excluding Assumption/Rejection Moti	591.30
B240	Tax Issues	681.30
B300	Claims and Plan	980.10
B310	Claims Administration and Objections	9,758.25
B320	Plan and Disclosure Statement (including Business Plan)	37,935.90
MED/CMS	Medicare/CMS Issues	81,541.80
	Total Fees	\$162,922.95

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
3/7/2025	Lexis THOMAS\ HENRY	323.36
3/7/2025	Lexis THOMAS\ HENRY	103.43
3/7/2025	Lexis THOMAS\ HENRY	28.85
3/18/2025	Lexis THOMAS\ HENRY	53.89
	SUBTOTAL	509.53
3/31/2025	LITIGATION SUPPORT VENDORS PACER 2637538-Q12025	29.80
	SUBTOTAL	29.80
3/7/2025	WESTLAW THOMAS\ HENRY	519.39
3/10/2025	WESTLAW THOMAS\ HENRY	150.00
3/11/2025	WESTLAW THOMAS\ HENRY	150.00
3/12/2025	WESTLAW THOMAS\ HENRY	300.00
3/18/2025	WESTLAW THOMAS\ HENRY	1,078.51
	SUBTOTAL	2,197.90
	Total Disbursements	\$2,737.23

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COMBINED TOTALS

Total Hours	167.80
Fee Total, all Matters	\$ 162,922.95
Disbursement Total, all Matters	\$ 2,737.23
Invoice Total, all Matters	<u>\$ 165,660.18</u>

Exhibit E

Summary of Actual and Necessary Expenses for the Fee Period

Summary of Actual and Necessary Expenses for the Fee Period

Expense	Amount
Westlaw / Lexis Research	\$2,857.43
Pacer/Litigation Support Vendors	\$29.80
Total:	\$2,887.23

Exhibit F

BLENDED RATE COMPARISON CHART

BLENDED RATE COMPARISON CHART

Category of Timekeeper	Blended Hourly Rate	
	Billed or Collected by Timekeepers, excluding bankruptcy⁹	Billed in this fee application
(using categories already maintained by the Firm)		
Partner	\$927.28	\$1,018.89
Counsel	\$886.50	\$886.50
Two Senior Associates (7 years or more since first admission)	\$648.50	\$909.00
One Mid-level Associate (4-6 years since first admission)	\$612.25	\$751.50
One Junior Associate (0-3 years since first admission)	\$544.96	\$769.50
Paralegals	\$371.10	\$405.18
All timekeepers aggregated	\$737.70	\$971.92

⁹ In accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective November 1, 2013, preceding year is the prior 12-month year; blended rates reflect work performed in preceding year in each of the domestic offices in which timekeepers collectively billed at least 10% of the hours to the case during the application period, excluding all data from bankruptcy law matters.