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

In re:	napter 11
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GLOBAL WOUND CARE MEDICAL GROUP, a Professional Corporation, 1

Case No. 24-34908 (CML)

Debtor.

SECOND SET OF MONTHLY FEE STATEMENTS OF SUZANNE RICHARDS FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES<sup>2</sup> INCURRED AS PATIENT CARE OMBUDSMAN FOR THE PERIOD FROM **JUNE 1, 2025, THROUGH AUGUST 31, 2025** 

Pursuant to the Order Granting Debtor's Motion for an Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 68] (the "Interim Compensation Order"), Patient Care Ombudsman ("PCO") Suzanne Richards hereby submits this second set of monthly fee statements<sup>3</sup> (the "Fee Statements") for compensation for services rendered and for reimbursement of expenses as the PCO for the period from June 1, 2025, through August 31, 2025 (the "Application Period"). A summary chart setting forth the compensation and expenses incurred during the Application Period is set forth below:

#### **SUMMARY CHART**

Name of Applicant:	Suzanne Richards
Applicant's Role in Case:	Patient Care Ombudsman
Date of Appointment:	11/04/2024 [Docket No. 46]

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

<sup>&</sup>lt;sup>3</sup> As set forth in the Interim Compensation Order [Docket No. 68], "[a]ny Retained Professional who fails to submit a Monthly Fee Statement for a particular month or months may subsequently submit a consolidated Monthly Fee Statement for multiple months provided that separate fee and expense information for each applicable month is provided in the consolidated statement."



<sup>&</sup>lt;sup>2</sup> There were no expenses incurred during the Application Period (as defined above).

	Beginning of Period	End of Period	
Time period covered by this Application:	6/01/2025	8/31/2025	
Time period(s) covered by prior Applications:	11/01/2024	5/31/25	
Total amounts paid in all prior Statements:		\$6,518.20	
Total fees requested in this Application: (80% of	of \$1,375.00)	\$1,100.00	
Total professional fees requested in this Applic	ation:	\$1,375.00	
Total actual professional hours covered by this	Application:	5.50	
Average hourly rate for professional:		\$250.00	
Total paraprofessional fees requested in this Ap	n/a		
Total actual paraprofessional hours covered by	n/a		
Average hourly rate for paraprofessionals:		n/a	
Reimbursable expenses sought in this Application:		\$0.00	
Total to be Paid to Priority Unsecured Creditors:		Not yet known	
Anticipated % Dividend to Priority Unsecured Creditors:		Not yet known	
Total to be Paid to General Unsecured Creditors:		Not yet known	
Anticipated % Dividend to General Unsecured Creditors:		Not yet known	
Date of Confirmation Hearing:		Not yet set	
Indicate whether plan has been confirmed:		No	

#### **OBJECTION DEADLINE**

In accordance with the Interim Compensation Order, each Notice Party or any other party in interest will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen (14) days after the filing of this Fee Statement ("Objection Deadline") to object to the requested fees and expenses in accordance with the procedures described in the Interim Compensation Order. Upon the expiration of the Objection Deadline, the Debtors are authorized to promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Statement.

#### **DETAIL FOR SERVICES RENDERED AND EXPENSES INCURRED**

- 1. On October 21, 2024, the Debtor commenced this proceeding with the filing of a voluntary petition under Chapter 11 of Title 11 of the Bankruptcy Code. The Debtor is authorized to continue to operate its business and manage its affairs as a debtor-in-possession. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, no trustee or examiner has been appointed in the Chapter 11 case. No creditors committee has been appointed.
- 2. On November 4, 2024, Kevin M. Epstein, the United States Trustee for the Southern District of Texas, filed the *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* [Docket No. 46], with a *Verified Statement and Affidavit of Disinterest* [Docket No. 46-1].
- 3. The PCO has prepared and Dentons has filed on January 14, 2025, the Submission of First Report of Suzanne Richards as Patient Care Ombudsman of the Debtor (for the period 11/04/2024 through 12/31/2024) [Docket No. 105]; filed on March 3, 2025 the Submission of Second Report of Suzanne Richards as Patient Care Ombudsman of the Debtor (for the period 1/01/2025 through 2/28/2025) [Docket No. 131]; filed on June 15, 2025 the Submission of Third Report of Suzanne Richards as Patient Care Ombudsman of the Debtor (for the period 4/30/2025 through 4/29/2025) [Docket No. 212]; filed on July 15, 2025 the Submission of Fourth Report of Suzanne Richards as Patient Care Ombudsman of the Debtor (for the period 4/30/2025 through 6/28/2025) [Docket No. 231]; and filed on August 29, 2025 the Submission of Fifth Report of Suzanne Richards as Patient Care Ombudsman of the Debtor (for the period 6/29/2025 through 8/28/2025) [Docket No. 250].

- 4. By this Fee Statement, the PCO requests payment of \$1,100.00 (80% of \$1,375.00) as compensation for reasonable and necessary legal services rendered for a total of \$1,100.00 for the Application Period.
  - 5. In support of this Fee Statement, attached are the following exhibits:
    - Exhibit A (Compensation related to one Project Category) is a schedule of the aggregate number of hours expended and fees incurred by the PCO;
    - Exhibit B (Compensation for Professional) is a schedule of certain information regarding the PCO's services for which compensation is sought in this Fee Statement;
    - Exhibit C (Expenses by Category) is a schedule confirming that there were *no expenses* incurred for which reimbursement is sought in this Fee Statement; and
    - Exhibit D (Invoices) consists of the PCO's two Invoices for services rendered and expenses incurred during the months of July and August within the Application Period. There were no fees incurred during the month of June.
- 6. Although every effort has been made to include all fees and expenses incurred in the Application Period, some fees and expenses might not be included in this Fee Statement due to delays caused by accounting and processing during the Application Period. Accordingly, the PCO reserves the right to seek allowance of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Interim Compensation Order.

#### **NOTICE**

7. Pursuant to the Interim Compensation Order, notice of this Fee Statement will be provided to the following Notice Parties via electronic mail: (a) the Debtor: Global Wound Care Medical Group, a Professional Corporation, % Owen B. Ellington, M.D., 2400 Augusta Drive, Suite 369, Houston, Texas 77057 (oellington@thewoundpros.com); (b) Raymond Millien, General Counsel, Wound Pros Management Group, 5901 West Century Boulevard, Suite 250, Los Angeles, California 90045 (raymond.millien@woundpros.com); (c) the Office of the U.S.

Trustee for the Southern District of Texas, Attn: Ha Nguyen, 515 Rusk Street, Suite 3516, Houston, Texas 77002 (ha.nguyen@usdoj.gov); and (d) any other parties that the Court may

designate.

**CONCLUSION** 

Wherefore, the PCO respectfully requests payment and reimbursement of fees and expenses incurred during the Application Period in the total amount of \$1,100.00, which is 80% of the fees incurred by the PCO for reasonable and necessary legal services, in accordance with

the procedures set forth in the Interim Compensation Order.

Dated: September 9, 2025

Respectfully submitted,

/s/ Suzanne Richards

Suzanne Richards
Patient Care Ombudsman
SMR Healthcare Management, Inc.
4525 Dean Martin Drive, Unit 2308
Las Vegas, Nevada 89103
+1714 290 6226

E-Mail: suzannerichards94@gmail.com

#### **CERTIFICATE OF SERVICE**

This is to certify that I have on September 9, 2025, caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey S. Doherty, Jr.

## **EXHIBIT A**

## COMPENSATION BY PROJECT CATEGORY

Project Category	Month	Hours	Fees
Work as Patient Care Ombudsman	June 2025 <sup>4</sup>	0.0	\$0.00
Work as Patient Care Ombudsman	July 2025	2.50	\$625.00
Work as Patient Care Ombudsman	August 2025	3.00	\$750.00
	TOTALS:	5.50	\$1,375.00

<sup>&</sup>lt;sup>4</sup> There were no fees incurred during the month of June.

## **EXHIBIT B**

### COMPENSATION BY PROFESSIONAL

Name of Professional	Position	Month	Hourly Rate	Hours Billed	Fees
Suzanne Richards	PCO	July 2025	\$250.00	2.50	\$625.00
Suzanne Richards	PCO	August 2025	\$250.00	3.00	\$750.00
			TOTALS:	5.50	\$1,375.00

## EXHIBIT C

### **EXPENSES BY CATEGORY**

Expense	Total
No expenses incurred	\$0.00
TOTALS:	\$0.00

## EXHIBIT D

## **INVOICES**

#### SMR Healthcare Management Inc

4525 Dean Martin Dr Unit 2308 Las Vegas, NV 89103-8118 USA 9098155051 suzannerichards94@gmail.com

# INVOICE

**BILL TO** 

Global Wound Care Medical

Group

Case No. 24-34908

SERVICE	DESCRIPTION	QTY	RATE	AMOUNT
Report Writing	7/14/25 Fourth Report Writing and note review	1	250.00	250.00
Virtual Meeting	7/17/25. Virtual Meeting with Angela, Vice President of Program Development and Program	0.50	250.00	125.00
Virtual Meeting	7/24/25. Virtual Meeting with Melissa Cavazos, Director of Internal Education	0.50	250.00	125.00
Virtual Meeting	7/24/25 Virtual Meeting with Kevin Smith, Vice President of Supply Chair	0.50	250.00	125.00
				NNS PPRZPANS VNW PPRZPA

**BALANCE DUE** 

\$625.00

#### SMR Healthcare Management Inc

4525 Dean Martin Dr Unit 2308 Las Vegas, NV 89103-8118 USA 9098155051 suzannerichards94@gmail.com

# INVOICE

**BILL TO** 

Global Wound Care Medical

Group

Case No. 24-34908

SERVICE	DESCRIPTION	QTY	RATE	AMOUNT
Virtual Meeting	8/21/25 Virtual Meeting Kevin Curtis, NP in Michigan	0.50	250.00	125.00
Policy/Documented Review	8/22/25 Review of Policies Policy on Policies Conflict of Interest	0.50	250.00	125.00
Report Writing	8/23/25. #5 PCO Report Writing and Note Review	2	250.00	500.00
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BALANCE DUE

\$750.00