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

In re:	Chapter 11

GLOBAL WOUND CARE MEDICAL GROUP, a Professional Corporation,¹

Debtor.

Case No. 24-34908 (CML)

SEVENTH MONTHLY FEE STATEMENT OF TOGUT, SEGAL & SEGAL LLP FOR COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED AS CONFLICTS COUNSEL FOR THE DEBTOR FOR THE PERIOD FROM AUGUST 1, 2025 THROUGH AUGUST 31, 2025

Pursuant to the Interim Compensation Order, Togut, Segal & Segal LLP (the "Togut Firm") hereby submits this monthly fee statement (this "Seventh Fee Statement") for compensation for services rendered and for reimbursement of expenses as conflicts counsel to the above-captioned debtor and debtor-in-possession (the "Debtor") for the period from August 1, 2025 through August 31, 2025 (the "Seventh Fee Period"). A summary chart setting forth the compensation and expenses during the Seventh Fee Period is set forth below:

SUMMARY CHART

Name of Applicant:	Togut, Segal & Segal LLP
Applicant's Role in Case:	Conflicts Counsel to the Debtor
Date of Retention: [Docket No. 127]	February 25, 2025, Effective
	January 9, 2025
Time period covered by this Seventh Fee	August 1, 2025 through August 31,
Statement:	2025
Time period(s) covered by prior Fee	January 9, 2025 through July 31,
Statements:	2025
Total amounts awarded in all prior Fee	\$192,902.06
Statements:	

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

Total fees requested in this Seventh Fee	\$4,769.60
Statement: (80% of \$5,962.00)	
Total actual professional hours covered by	6.4
this Seventh Fee Statement:	
Average hourly rate for professionals:	\$931.56
Total paralegal fees requested in this Seventh	\$1,030.40
Fee Statement:	
Total actual paralegal hours covered by this	2.3
Seventh Fee Statement:	
Average hourly rate for paralegals:	\$560.00
Reimbursable expenses sought in this Seventh	\$0.00
Fee Statement:	

OBJECTION DEADLINE

In accordance with 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 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 Seventh 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 Debtor is authorized to promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Seventh Fee Statement.

DETAIL FOR SERVICES RENDERED AND EXPENSES INCURRED

- 1. On January 29, 2025, Global Wound Care Medical Group, a Professional Corporation, filed its *Application for Entry of an Order Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Conflicts Counsel Effective as January* 9, 2025 [Docket No. 110] (the "<u>Application</u>"). The Court entered an Order approving the Application on February 25, 2025 [Docket No. 127].
- 2. On May 5, 2025, the Togut Firm filed its *First Monthly Fee Statement for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from January 9, 2025 Through February 28, 2025* [Docket No. 193] (the "First Fee Statement"), requesting payment of \$53,768.40 (80% of

\$67,210.50) as compensation for reasonable and necessary legal services rendered and \$203.99 for reimbursement of actual and necessary expenses.

- 3. On May 19, 2025, the Togut Firm filed its *Second Monthly Fee Statement for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from March 1,* 2025 Through March 31, 2025 [Docket No. 202] (the "Second Fee Statement"), requesting payment of \$32,238.00 (80% of \$40,297.50) as compensation for reasonable and necessary legal services rendered and \$0.00 for reimbursement of actual and necessary expenses.
- 4. On June 23, 2025, the Togut Firm filed its *Third Monthly Fee Statement for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from April 1,* 2025 *Through April 30,* 2025 [Docket No. 221] (the "<u>Third Fee Statement</u>"), requesting payment of \$113,410.40 (80% of \$141,76.00) as compensation for reasonable and necessary legal services rendered and \$367.79 for reimbursement of actual and necessary expenses.
- 5. On August 8, 2025, the Togut Firm filed its *Fourth Monthly Fee Statement for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from May 1, 2025 Through May 31, 2025* [Docket No. 242] (the "Fourth Fee Statement"), requesting payment of \$30,606.00 (80% of \$38,257.50) as compensation for reasonable and necessary legal services rendered and \$25.97 for reimbursement of actual and necessary expenses.
- 6. On September 5, 2025, the Togut Firm filed its *Fifth Monthly Fee Statement* for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from May 1, 2025 Through May 31, 2025 [Docket No. 242] (the "<u>Fifth Fee Statement</u>"), requesting payment of \$12,844.80 (80% of

\$16,056.00) as compensation for reasonable and necessary legal services rendered and \$00.00 for reimbursement of actual and necessary expenses.

- 7. On September 19, 2025, the Togut Firm filed its *Sixth Monthly Fee Statement* for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from May 1, 2025 Through May 31, 2025 [Docket No. 259] (the "Sixth Fee Statement"), requesting payment of \$13,884.80 (80% of \$17,356.00) as compensation for reasonable and necessary legal services rendered and \$00.00 for reimbursement of actual and necessary expenses.
- 8. By this Seventh Fee Statement, the Togut Firm requests payment of \$4,769.60 (80% of \$5,962.00) as compensation for reasonable and necessary legal services rendered and \$0.00 for reimbursement of actual and necessary expenses, for a total of \$4,769.60 for the Seventh Fee Period.
- 9. In support of this Seventh Fee Statement, attached are the following exhibits:
 - <u>Exhibit A</u> (Compensation by Project Category) is a schedule of the aggregate number of hours expended and fees incurred by project category;
 - <u>Exhibit B</u> (Compensation by Professional) is a schedule of certain information regarding the Togut Firm's attorneys and paraprofessionals for whose services compensation is sought in this Seventh Fee Statement;
 - <u>Exhibit C</u> (Invoices) consists of detailed records (including the relevant time entry and description and expense detail) for services rendered and reimbursement of expenses incurred during the Seventh Fee Period.
- 10. Although every effort has been made to include all fees and expenses incurred in the Seventh Fee Period, some fees and expenses might not be included in this Seventh Fee Statement due to delays caused by accounting and processing during

the Seventh Fee Period. The Togut Firm 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

11. Pursuant to the Interim Compensation Order, notice of this Seventh Fee Statement will be provided to the following Notice Parties via electronic mail upon:

a. the Debtor: % Global Wound Care Medical Group, a Professional Corporation, Attn: Raymond Millien, General Counsel, Wound Pros Management Group, 5901 West Century Boulevard, Suite 250, Los Angeles, California 90045 (raymond.millien@woundpros.com); b. 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

c. any other parties that the Court may designate.

WHEREFORE, the Togut Firm respectfully requests payment and reimbursement of its fees and expenses incurred during the Seventh Fee Period in the total amount of \$4,769.60, which is 80% of the fees for reasonable and necessary legal services rendered, in accordance with the procedures set forth in the Interim Compensation Order.

[Concludes on Following Page.]

CONCLUSION

Based on the foregoing, the Debtor respectfully requests that this Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: November 11, 2025

New York, New York

Respectfully submitted,

TOGUT, SEGAL & SEGAL LLP

By:

/s/Frank A. Oswald

Frank A. Oswald (admitted pro hac vice)

One Penn Plaza, Suite 3335 New York, New York 10119

Telephone: (212) 594-5000 Facsimile: (212) 967-4258

Conflicts Counsel to the Debtor

EXHIBIT "A"

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Global Wound Care 8/1/2025...8/31/2025

Summary Report

9/22/2025 10:56:19 AM

ID	Name/Description		Slip Hours	Slip Amount
Automat	ic Stay Issues		3.4	3,876.00
Profession	onals Fees/Other		0.7	798.00
TSS Fee	Application/Fee Statements		2.3	1,288.00
		Grand Total:	6.4	5,962.00

EXHIBIT "B"

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9/22/2025 10:56:46 AM

ID	Name/Description		Slip Hours	Slip Amount
dperson	Dawn Person		2.3	1,288.00
jborriello	Jared Borriello		4.1	4,674.00
		Grand Total:	6.4	5,962.00

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9/22/2025 10:57:06 AM

ID	Name/Description		Slip Hours	Slip Amount
Automatic Stay Issues			3.4	3,876.00
jborriello	Jared Borriello		3.4	3,876.00
Professionals Fees/Other		0.7	798.00	
jborriello	Jared Borriello		0.7	798.00
TSS Fee Ap	plication/Fee Statements		2.3	1,288.00
dperson	Dawn Person		2.3	1,288.00
		Grand Total:	6.4	5,962.00

EXHIBIT "C"

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9/22/2025 10:56:46 AM

ID	Name/Description		Slip Hours	Slip Amount
dperson	Dawn Person		2.3	1,288.00
jborriello	Jared Borriello		4.1	4,674.00
		Grand Total:	6.4	5,962.00

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9/22/2025 10:57:06 AM

ID	Name/Description		Slip Hours	Slip Amount
Automatic Stay Issues		3.4	3,876.00	
jborriello	Jared Borriello		3.4	3,876.00
Professionals Fees/Other		0.7	798.00	
jborriello	Jared Borriello		0.7	798.00
TSS Fee Ap	plication/Fee Statements		2.3	1,288.00
dperson	Dawn Person		2.3	1,288.00
		Grand Total:	6.4	5,962.00

Case 24-34908 Document 329 Filed in TXSB on 11/11/25 Page 15 of 19 Togut, Segal & Segal LLP Client Billing Report

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
	Matter: Automatic Stay Issues			
8/6/25	jborriello / Review Docs. Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1260320	Review milestone deadlines and prepare follow email to counsel for Wells Fargo re stipulation modifications.			
8/10/25	jborriello / Comm. Profes. Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1260347	Email communications with counsel for Wells Fargo re proposed modifications to Settlement Stipulation.			
8/10/25	jborriello / Draft Documents Automatic Stay Issues	Т	0.4 1,140.00	456.00 Billable
#1260348	Prepare draft notices of compliance with August 15, 2025 milestones related to submission of CMS form to Texas and Michigan (0.2) and July 2025 disbursement and receipts report (0.2).			
8/11/25	jborriello / Comm. Profes. Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1260365	Email communications with client and Dentons re draft Milestone compliance notices.			
8/12/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1260382	Email communications with client re status of information requests related to August 15, 2025 Milestone Notices to Wells Fargo.			
8/12/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1260383	Email communications with client re the status of the transition of state CMS deposits to New Account.			

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Global Wound Care 8/1/2025...8/31/2025

Client Billing Report

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
8/12/25	jborriello / Draft Documents Automatic Stay Issues	Т	0.4 1,140.00	456.00 Billable
#1260384	Prepare letter re notice of Milestone compliance related to CMS processing through New Account for GA, LA, and TN (0.3); email communications with counsel for Wells Fargo re same (0.1).	I		
8/12/25	jborriello / Draft Documents Automatic Stay Issues	Т	0.5 1,140.00	570.00 Billable
#1260385	Revise and revise Milestone Notice letter pursuant to Paragraph 6 of the Wells Fargo Stipulation & Order (0.3); email communications with counsel for Wells Fargo re notice of milestone compliance pursuant to paragraph 4(b) (iii), 4(b)(iv), and 6 (0.2).			
8/20/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1260459	Email communications with client and Dentons re August 31, 2025 milestone deadline.			
8/20/25	jborriello / Comm. Profes. Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1260460	Email communications with counsel for Wells Fargo re request for modification to settlement stipulation.			
8/20/25	jborriello / Review Docs. Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1260461	Review and analysis re Wells Fargo counterproposal for modification of Settlement stipulation; email communications with client and Dentons re same.			
8/21/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1261443	Email communications with GWC and Dentons re negotiations with Wells Fargo re modification of Settlement Stipulation.	t		

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
8/25/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1261475	Email communications with Ralph Cetrulo (GWC) re Well Fargo stipulation.	s		
8/26/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1261485	Email communications with Ralph Cetrulo (GWC) re discussion of Wells Fargo stipulation			
8/27/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1261500	Email communications with client re Wells Fargo Stipulation.			
8/27/25	jborriello / Comm. Client Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1261501	Telephone communications with client re Wells Fargo Stipulation.			
8/28/25	jborriello / Comm. Profes. Automatic Stay Issues	Т	0.1 1,140.00	114.00 Billable
#1261519	Email communications with counsel for Wells Fargo re Settlement Stipulation.			
8/28/25	jborriello / Prepare Meeting Automatic Stay Issues	Т	0.2 1,140.00	228.00 Billable
#1261521	Prepare for meeting with counsel for Wells Fargo re amendment of Settlement Stipulation.			
	Matter Total:	3.	40	3,876.00
	Matter: Professionals Fees/Other			
8/7/25	jborriello / Review Docs. Professionals Fees/Other	Т	0.2 1,140.00	228.00 Billable
#1260341	Review and approve Togut Fourth monthly fee statement	 		

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
8/8/25	jborriello / Revise Docs. Professionals Fees/Other	Т	0.2 1,140.00	228.00 Billable
#1262930	Review and revise Togut July 2025 time entries.			
8/22/25	jborriello / Draft Documents Professionals Fees/Other	Т	0.3 1,140.00	342.00 Billable
#1261452	Prepare Fifth Monthly Fees Statement for Togut (0.2): email communications with DP re same (0.1).			
	Matter Total:	0.	70 ——	798.00
	Matter: TSS Fee Application/Fee			
8/7/25	dperson / Inter Off Memo TSS Fee Application/Fee Statements	Т	0.2 560.00	112.00 Billable
#1256998	E-mails with JB re: 4th Interim Fee Statement, filing issu	ies.		
8/7/25	dperson / Review Docs. TSS Fee Application/Fee Statements	Т	0.5 560.00	280.00 Billable
#1256999	Review and prepared 4th Interim Fee Statement for clie Review.	nt		
8/8/25	dperson / Prep Filing/Svc TSS Fee Application/Fee Statements	Т	1.2 560.00	672.00 Billable
#1256982	Prepared, filed and coordinate service re: May Fee Statement			
8/8/25	dperson / Inter Off Memo TSS Fee Application/Fee Statements	Т	0.2 560.00	112.00 Billable
#1256983	E-mails with JB re: final review in connection with filing I Fee Statement	May		
8/18/25	dperson / Inter Off Memo TSS Fee Application/Fee Statements	Т	0.2 560.00	112.00 Billable
#1262892	Communications with JB re: Monthly statements, payme and related issues.	ents		
	Matter Total:	2.	30	1,288.00

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Date Slip Number	Hours T/E Rate	Slip Amount Billing Status
	Total Time Bill:	5,962.00
	Total Time Non Bill:	
	Total Costs Bill:	
	Total Costs Non Bill:	
	Total Non Billable:	
	Total Billable:	5,962.00
	Grand Total:	5,962.00