

**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 COVER SHEET TO FIRST INTERIM FEE
APPLICATION OF TOGUT, SEGAL & SEGAL LLP, AS CONFLICTS
COUNSEL FOR THE DEBTOR, FOR THE PERIOD FROM
JANUARY 9, 2025, THROUGH MARCH 31, 2025**

Name of Applicant:	Togut, Segal & Segal LLP	
Applicant's Role in Case:	Conflicts Counsel for the Debtor	
Date of Employment Order Signed:	2/25/2025 [Docket No. 127]	
	Beginning Date	End of Period
Time period covered by this Application:	1/9/25	3/31/25
Time period(s) covered by prior Application:	N/A	N/A
Total amounts awarded in prior Application:	N/A	
Total fees requested in this Application:	\$107,508.00	
Total attorney fees requested in this Application:	\$107,284.00	
Total actual attorney hours covered by this Application:	126.6	
Blended hourly rate for attorneys:	\$849.00	
Total paralegals fees requested in this Application:	\$224.00	
Total actual paralegal hours covered by this Application:	.4	
Average hourly rate for paralegal:	\$560.00	
Reimbursable expenses sought in this Application:	\$203.99	
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	



2434908251111000000000002

Name of Applicant:	Togut, Segal & Segal 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

**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)

**FIRST INTERIM FEE APPLICATION OF TOGUT, SEGAL & SEGAL
LLP, CONFLICTS COUNSEL FOR THE DEBTOR, FOR INTERIM
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND REIMBURSEMENT OF ACTUAL AND
NECESSARY EXPENSES INCURRED FROM JANUARY 9, 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.

Togut, Segal & Segal LLP (the “Togut Firm”), conflicts 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 first application (the “Application”) for interim allowance of compensation for professional services performed by the Togut Firm during the period commencing January 9, 2025, through and including March 31, 2025 (the “Compensation Period”) in the amount of \$107,508, and for reimbursement of its actual and necessary expenses incurred for the Compensation Period in the amount of \$203.99. The Togut Firm has filed two monthly fee statements during the Compensation Period as follows:

(i) 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 to the Debtor for the Period from January 9, 2025 Through February 28, 2025 [Docket No. 193] (the “First Monthly Fee Statement”) seeking fees of \$67,210.50 and expenses of \$203.99, pursuant to which the Togut Firm has been paid \$53,768.40 in fees and \$203.99 in expenses, leaving a balance due of \$13,442.10; and (ii) 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 to the Debtor for the Period from March 1, 2025 Through March 31, 2025* [Docket No. 202] (the “Second Monthly Fee Statement”), seeking an award of \$40,297.50 in fees, pursuant to which the Togut Firm has been paid \$32,238.00, leaving a balance due of \$8,059.50. In this Application, the Togut Firm seeks a total award of \$107,508 in fees and \$203.99 in expenses for the Compensation Period.

Preliminary Statement

1. During the Compensation Period, the Togut Firm was engaged in, among other things, addressing Wells Fargo Bank, N.A.’s attempts to close the Debtor’s primary operating accounts, which serve as the conduit for all Medicare, insurance, and patient reimbursements, and to negotiating a consensual resolution that would safeguard the Debtor’s ability to continue operations.
2. The professional services performed, and expenses incurred by the Togut Firm 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.
3. Given the circumstances of this Case, the Togut Firm charges for professional services performed and expenses incurred are reasonable and appropriate under applicable standards.

4. The Togut Firm 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 the Togut Firm

11. On January 29, 2025, the Debtor filed the *Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Conflicts Counsel Effective as of the January 9, 2025* [Docket No. 110] (the “Retention Application”). On February 25, 2025, the Court entered the *Order Approving Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Bankruptcy Counsel Effective as of January 9, 2025* [Docket No. 127] (the “Retention Order”).

Summary of Professional Compensation and Reimbursement of Expenses Requested

12. The Togut Firm seeks (i) interim allowance of compensation for professional services performed during the Compensation Period in the amount of \$107,508, and (ii) reimbursement of expenses incurred in connection with the rendition of such services in the amount of \$203.99.

13. During the Compensation Period, Togut Firm's attorneys and paralegals expended a total of 126.6 hours in connection with the necessary services performed.

14. There is no agreement or understanding between the Togut Firm 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, the Togut Firm received payment from the Debtor in the amount of \$86,210.39 in accordance with the First Monthly Fee Statement. Subsequent to the Compensation Period, the Togut Firm received payments from the Debtor in the amounts of \$53,972.39 in accordance with the First Monthly Fee Statement and \$32,238 in accordance with the Second Monthly Fee Statement.

15. As already noted, the Togut Firm has filed two Monthly Fee Statements, on May 5, 2025 [Docket No. 193], on May 19, 2025 [Docket No. 202], 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
First Statement Jan. 9-Feb 28, 2025	\$67,210.50	\$53,768.40	\$203.99	\$203.99
Second Statement March 1-31, 2025	\$40,297.50	\$32,238.00	N/A	N/A

16. The fees charged by the Togut Firm in this Case are billed in accordance with the Togut Firms' existing billing rates and procedures in effect during the Compensation Period. The rates the Togut Firm charges for the services rendered by its professionals and paralegals in this Case are no greater than the rates the Firm charges for professional and paralegal 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 Frank A. Oswald*, Counsel (the “Oswald Certification”) regarding the Togut Firms’ compliance with the Fee Guidelines.

18. Attached hereto as **Exhibit “C”** is a schedule of all the Togut Firms’ attorneys and paralegals who have performed services for the Debtor during the Compensation Period, the capacities in which each individual is employed by the Togut Firm, the hourly billing rate charged by the Togut Firm 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. The Togut Firm maintains computerized records of the time spent by all of the Togut Firms’ attorneys and paralegals in connection with the representation of the Debtor in this Case. Attached hereto as **Exhibit “D”** the Togut Firms’ detailed time records (including the relevant time entry and description) for services rendered hereinafter described in the format specified by the Fee Guidelines (the “Time Records”).

20. Attached hereto as **Exhibit “E”** is a summary schedule and detailed records of the expenses for which the Togut Firm is seeking reimbursement 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 Togut Firms’ 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. The Togut Firm discussed its rates, fees, and staffing with the Debtor prior to the Togut Firm's engagement 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 paralegals 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, the Togut Firm 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 the Togut Firm During the Compensation Period

25. During the Compensation Period, the Togut Firm rendered 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 the Togut Firm during the Compensation Period, organized in accordance with the Togut Firms' internal billing system, and broken down by project category:

- a. Case Administration
Fees: \$808; Total Hours: 0.8

During the Compensation Period, the Togut Firm: (i) participated in conferences regarding (a) participated in telephone calls and written correspondence with representatives of Wells Fargo Bank regarding the Debtor's banking relationship; (ii) participated in video

conferences with attorneys at Dentons (“Dentons”), the Debtor’s Chief Financial Officer, and CRO regarding the Debtor’s banking relationship with Wells Fargo Bank; (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;

- b. Retention of Professionals:
Fees: \$14,023.50; Total Hours: 16.8

During the Compensation Period, the Togut Firm performed services related its retention application, including the preparation of the application and supporting declarations.

- c. Automatic Stay Matters:

Fees: \$92,575.50; Total Hours: 108.9

During the Compensation Period, the Togut Firm devoted substantial time and resources to addressing Wells Fargo’s efforts to close the Debtor’s primary operating accounts, which serve as the conduit for all Medicare, insurance, and patient reimbursements, and to negotiating a consensual resolution that would safeguard the Debtor’s ability to continue operations.

26. In connection with the foregoing, the Togut Firm prepared, on behalf of the Debtor, an array of correspondence and draft pleadings related to the dispute with Wells Fargo; conducted extensive legal research in connection with the dispute and engaged in negotiations with Wells Fargo in support of positions taken by the Debtor.

27. The foregoing professional services were necessary and appropriate to the administration of this Case. The professional services performed by the Togut Firm 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 the Togut Firms' professional services were performed skillfully and efficiently.

28. The professional services performed by the Togut Firm on behalf of the Debtor during the Compensation Period required an aggregate expenditure of 126.6 hours by the Togut Firms' partners, counsel, associates and paralegals. Of the aggregate time expended, 9.9 recorded hours were expended by partners and counsel, 116.3 recorded hours were expended by associates, and .4 recorded hours were expended by paralegals.

29. During the Compensation Period, the Togut Firm billed the Debtor for time expended by attorneys based on hourly rates ranging from \$535 to \$1,065 per hour for attorneys. Allowance of compensation in the amount requested would result in a blended hourly billing rate for Togut attorneys in this Application of approximately \$850 (based on 126.2 recorded hours for attorneys billing rates in effect at the time of the performance of services).

Actual and Necessary Disbursements

30. As set forth in Exhibit "E" attached hereto, the Togut Firm has disbursed \$203.99 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.

31. With respect to legal research, the Togut Firm 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 the Togut Firms' direct operating costs, which costs are not incorporated into the Togut Firms' hourly billing rates. Only clients who 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.

32. The Togut Firm 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

33. 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."

34. 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 Bankruptcy Code, courts "shall consider the nature, the extent, and the value of such services, considering 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).

35. The Togut Firm 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 considering the nature, extent, and value of such services to the Debtor, its estate, and all parties in interest.

36. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the issues and tasks involved. Not only were Togut Firms' professional services performed skillfully and efficiently, but whenever possible the Togut Firm sought to minimize the cost of its services to the Debtor by utilizing junior attorneys and paralegals to handle the more routine aspects of case administration.

37. In sum, the services rendered by the Togut Firm 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

38. 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

39. The Togut Firm respectfully requests that the Court (i) award interim allowance of fees in the amount of \$107,508, representing 100% of fees incurred during the Compensation Period, and reimbursement of expenses in the amount of \$203.99, representing 100% of actual and necessary expenses incurred during the Compensation Period, (ii) that such allowance be without prejudice to the Togut Firms' 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: November 11, 2025
New York, New York

Respectfully submitted,

TOGUT, SEGAL & SEGAL LLP

By:

/s/Frank A. Oswald

Frank 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

Certificate of Service

I hereby certify that on November 11, 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/Frank A. Oswald

Frank A. Oswald

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 *First Interim Application of Togut, Segal & Segal LLP* (the “Applicant”), *Conflicts Counsel for Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 9, 2025, Through and Including March 31, 2025* (the “Application”) filed by Togut, Segal & Segal LLP (the “Applicant”). The Court orders:

1. The Applicant is allowed interim compensation of \$107,508 and reimbursement of expenses in the amount of \$203.99, a total of \$107,711.99, 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 FRANK OSWALD IN SUPPORT OF FIRST INTERIM FEE
APPLICATION OF TOGUT, SEGAL & SEGAL LLP AS CONFLICTS COUNSEL FOR
THE DEBTOR, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND REIMBURSEMENT OF ACTUAL AND NECESSARY
EXPENSES INCURRED FROM JANUARY 9, 2025, THROUGH MARCH 31, 2025**

I, Frank Oswald, hereby certify that:

1. I am a member of Togut, Segal & Segal LLP (the “Togut Firm”). The Togut Firm maintains its office at One Penn Plaza, Suite 3335, New York, NY 10119.
2. This certification (“Certification”) is made in connection with the concurrently filed *First Interim Fee Application of Togut, Segal & Segal LLP, Conflicts Counsel for the Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from January 9, 2025, through March 31, 2025* (the “Application”), for compensation and reimbursement of expenses for the period commencing January 9, 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 the Togut Firm 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 the Togut Firms’ fees and disbursements accrued during the Compensation Period.

4. The Togut Firm 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 paralegals 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, the Togut Firm responds to the questions identified therein as follows:

Question 1: Did the Togut Firm agree to any variation from, or alternatives to, the Togut Firms’ 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: N/A

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 the Togut Firm 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.

Question 6: Does the Application include any rate increases since the Togut Firm's 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.

Dated: November 11, 2025
New York, New York

/s/Frank A. Oswald
Frank A. Oswald

Exhibit C**COMPENSATION BY PROFESSIONAL
JANUARY 9, 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	YEAR	HOURLY BILLING RATE	TOTAL BILLED HOURS	TOTAL COMPENSATION
Kyle J. Ortiz	Partner	2009	\$1,295.00	9.9	\$12,820.50
Ronald D. Howard	Associate	2014	\$1,065.00	7.6	\$8,094.00
Amanda C. Glaubach	Associate	2016	\$1,010.00	59.4	\$59,994.00
Leila Ebrahimi	Associate	2022	\$535.00	49.3	\$26,375.50
Dawn Person	Sr. Paralegal	N/A	\$560.00	.4	\$224.00
Totals:				126.6	\$107,508.00
Blended Hourly Rate (All Professionals)					\$849.00

The total fees for the Compensation Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners	\$1,295	9.9	\$12,820.50
Associates	\$812	116.3	\$94,463.50
Paralegals	\$560	.4	\$224.00
Blended Attorney Rate	\$850	126.2	\$107,284.00
Blended Rate for All Timekeepers	\$849	126.6	\$849.00

COMPENSATION BY PROJECT CATEGORY
JANUARY 9, 2025, THROUGH AND INCLUDING MARCH 31, 2025

PROJECT CATEGORY	TOTAL BILLED HOURS	TOTAL COMPENSATION
Automatic Stay Issues	108.9	\$92,575.50
Case Status/Strategy	0.8	\$808.00
Research	0.1	\$101.00
Retention of Professionals	16.8	14,023.50
Totals:	126.6	\$107,508.00

Exhibit D

Summary and Detailed Time Records

SUMMARY OF MONTHLY FEE STATEMENTS FOR FIRST INTERIM FEE APPLICATION

First Interim Fee Application								
Period: January 9, 2025 Through March 31, 2025								
Date Filed	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Requested with Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested
		Fees	Expenses	Fees (@80%)	Fees (@100%)	Fees (@80%)	Expenses (@100%)	Fees (@20%)
5/05/2025	1/09/25 – 2/28/25	\$67,210.50	\$203.99	\$53,768.40	\$67,210.50	\$53,768.40	\$203.99	\$13,442.10
5/19/2025	3/01/25 – 3/31/25	\$40,297.50	\$0.00	\$32,238.00	\$40,297.50	\$32,238.00	\$0.00	\$8,059.50
Totals		\$107,508.00	\$203.99	\$86,006.40	\$107,508.00	\$86,004.40	\$203.99	\$21,501.60

Summary of Any Objection to Monthly Fee Statements: None¹

Compensation Sought in this Application Not Yet Paid: \$21,501.60 (“Holdbacks”)

¹ The objection deadline to the Togut Firm’s First Monthly Fee Statement was May 19, 2025; the objection deadline to the Second Monthly Fee Statement was June 2, 2025; No objections were filed.

Global Wound Care
1/9/2025...3/31/2025

Togut, Segal & Segal LLP
Summary Report

9/4/2025
2:34:13 PM

ID	Name/Description	Slip Hours	Slip Amount
aglaubach	Amanda Glaubach	59.4	59,994.00
dperson	Dawn Person	0.4	224.00
kortiz	Kyle Ortiz	9.9	12,820.50
lebrahimi	Leila Ebrahimi	49.3	26,375.50
rhoward	Ronald Howard	7.6	8,094.00
Grand Total:		126.6	107,508.00

Global Wound Care
1/9/2025...3/31/2025

Togut, Segal & Segal LLP
Summary Report

9/4/2025
2:34:44 PM

ID	Name/Description	Slip Hours	Slip Amount
	Automatic Stay Issues	108.9	92,575.50
	Case Status/Strategy	0.8	808.00
	Research	0.1	101.00
	Retention of Professionals	16.8	14,023.50
	Grand Total:	126.6	107,508.00

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Matter: Automatic Stay Issues				
1/9/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1208230	Review KO comments to autostay letter.			
1/9/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1208231	Revise letter to include comments from KO.			
1/9/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1208232	Emails with BK, KO re global wound care letter.			
1/9/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1208233	Revise letter re autostay (.1) and internal emails re same (.1).			
1/9/25	kortiz / Review Docs. Automatic Stay Issues	T	0.8 1,295.00	1,036.00 Billable
#1209013	Review and comment on letter to Wells Fargo concerning threat to close account			
1/13/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1209723	Follow up with T. Moyron on letter			
1/14/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209164	Emails with KO re updated letter re automatic stay.			
1/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209168	Revise WF Letter re KO email re same (.2) and internal emails with KO re same (.2).			

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1/14/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209169	Emails with Dentons re updated letter.			
1/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1209170	Additional revisions to Wells Fargo letters (.2) and internal emails with KO re same (.1).			
1/14/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209171	Email to Wells Fargo re letter.			
1/14/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209172	Emails with Dentons re Wells Fargo letter.			
1/14/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1209736	Communication with Dentons and AG on Wells Fargo Letter and contact info			
1/14/25	kortiz / Review Docs. Automatic Stay Issues	T	0.6 1,295.00	777.00 Billable
#1209737	Revise letter to Wells Fargo to incorporate government stipulation			
1/15/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.6 535.00	321.00 Billable
#1209225	OC KO AG re autostay motion			
1/15/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1209226	OC AG re autostay letter			

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1/15/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1209240	OC AG re review of precedents motions in connection with autostay motion			
1/15/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1209241	Follow up OC KO re autostay motion			
1/15/25	lebrahimi / Research Automatic Stay Issues	T	1.2 535.00	642.00 Billable
#1209453	Research autostay motion precedent re draft motion re same			
1/15/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.5 1,010.00	505.00 Billable
#1209641	OC with LE and KO re motion re autostay.			
1/15/25	aglaubach / Research Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209644	Review precedent pleadings re credit card motion in connection with autostay motion.			
1/15/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209645	OC with LE re autostay motion.			
1/15/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209646	Follow up TC with LE and KO re motion re autostay.			
1/15/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209655	Emails with JT and LE re research re automatic stay.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/15/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1209744	Call with T. Moyron on letter to Wells Fargo on account closing threat			
1/15/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1209745	Call with AG and LE on motion against Wells Fargo and next steps			
1/16/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1209442	Comms AG re precedent for TRO			
1/16/25	lebrahimi / Research Automatic Stay Issues	T	1.1 535.00	588.50 Billable
#1209443	Research precedent TRO motions re autostay bank account issue			
1/16/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1209444	Comms with AG JB re precedent for TRO			
1/16/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209933	OC with JT re research re autostay.			
1/16/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1209938	Emails with JT re autostay research .			
1/16/25	aglaubach / Research Automatic Stay Issues	T	2.2 1,010.00	2,222.00 Billable
#1209940	Research and drafting re Memo of law re TRO.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/17/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1209596	OC with AG re applicable precedent for autostay / tro motion			
1/17/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1209666	TC with LE re TRO motion.			
1/17/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1209667	Emails with KO and LE re TRO/autostay papers			
1/17/25	aglaubach / Research Automatic Stay Issues	T	0.9 1,010.00	909.00 Billable
#1209668	Research re TRO papers re autostay letter.			
1/17/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209673	OC with KO and LE re preliminary injunction papers.			
1/17/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209674	Follow up OC with LE re preliminary injunction papers.			
1/17/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1209765	Communication with Morgan Lewis in connection with representation of Wells Fargo.			
1/17/25	kortiz / OC/TC strategy Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1209766	Call with AG and LE on whether to style Wells Fargo Motion as autostay or TRO relief			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/19/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209675	Internal emails with KO and LE re tro papers.			
1/19/25	aglaubach / Draft Documents Automatic Stay Issues	T	1.4 1,010.00	1,414.00 Billable
#1209676	Additional drafting and research re memo of law re TRO.			
1/20/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1209706	OC with AG re complaint and memo of law			
1/20/25	aglaubach / Draft Documents Automatic Stay Issues	T	4.2 1,010.00	4,242.00 Billable
#1209954	Drafting re complaint and research re same re: TRO.			
1/20/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209957	TC with LE re complaint and memo of law.			
1/20/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1209959	Emails with LE re complaint.			
1/20/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209968	Emails with LE re WF complaint.			
1/20/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1209969	Review LE memo of law re WF complaint.			
1/20/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209972	Emails with LE re comments to memo of law.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/20/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1209978	Emails with JT re research re memo of law.			
1/20/25	lebrahimi / Draft Documents Automatic Stay Issues	T	2.9 535.00	1,551.50 Billable
#1209987	Draft fact section for motion for prelim inj / tro re Wells Fargo autostay issues			
1/20/25	lebrahimi / Draft Documents Automatic Stay Issues	T	2.8 535.00	1,498.00 Billable
#1209988	Draft arguments for motion for prelim inj / tro re Wells Fargo autostay issues			
1/20/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.8 535.00	428.00 Billable
#1209989	Review AG draft complaint and make revisions re same in connection with draft tro / prelim injunction motion			
1/20/25	lebrahimi / Review Docs. Automatic Stay Issues	T	1.1 535.00	588.50 Billable
#1209990	Review precedent tro / prelim inj (.4); review autostay letter and WF letter (.3); re cash management motion and order (.1); review FDD (.3) re draft motion for tro / prelim inj			
1/20/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.8 535.00	428.00 Billable
#1209991	Review / revise motion for prelim inj / tro before circulation to KO for review			
1/20/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1209992	Comms iwth AG re research for TRO / prelim inj motion			
1/20/25	lebrahimi / Draft Documents Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1211630	Draft order re TRO / prelim inj motion			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/21/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1210237	OC AG re WF contact in connection with autostay issues			
1/21/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210392	OC with LE re GWC and next steps re same in connection with autostay and retention.			
1/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210396	Internal emails and communications re Wells Fargo contact.			
1/21/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210397	Review documents re Wells Fargo in advance of call to WF re same.			
1/21/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1212211	E-mail S. Wheeler concerning any agreements with the bank			
1/21/25	kortiz / Review Docs. Automatic Stay Issues	T	1.1 1,295.00	1,424.50 Billable
#1212212	Begin to review the memo of law relating to the Wells Fargo TRO			
1/22/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1210440	OC with AG re comms with WF re autostay letter			
1/22/25	lebrahimi / Comm. Others Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1210449	Multiple comms with JT re property of the estate research in connection with autostay motion			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/22/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210608	Emails with KO and LE re research re autostay papers and others items re same.			
1/22/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210612	Call with Wells Fargo re autostay.			
1/22/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210613	OC with LE re Wells Fargo communications and pleadings re same re autostay.			
1/22/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1210614	OC with KO re communications with Wells Fargo.			
1/22/25	aglaubach / Research Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1210636	Review research in connection with autostay and TRO papers.			
1/22/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1212226	E-mails with AG and LE on comments to complaint and additional research questions			
1/22/25	kortiz / Review Docs. Automatic Stay Issues	T	0.7 1,295.00	906.50 Billable
#1212227	Continue to review and comment on complaint and memo of law			
1/23/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1210657	Call to Wells Fargo re autostay letter (.1) and internal emails re same (.1).			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/24/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211197	Call to Wells Fargo re automatic stay.			
1/26/25	lebrahimi / Review Docs. Automatic Stay Issues	T	1.2 535.00	642.00 Billable
#1210881	Review research re autostay / property of the estate in connection with Wells Fargo autostay / tro motion			
1/26/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1210882	Comms with MM re research re autostay / property of the estate in connection with Wells Fargo autostay / TRO motion			
1/27/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211210	Internal communications with KO and LE re Wells Fargo information.			
1/27/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211212	Call to Wells Fargo re bank account.			
1/27/25	aglaubach / Research Automatic Stay Issues	T	2.4 1,010.00	2,424.00 Billable
#1211236	Additional research re general automatic stay and bank accounts (2.2) and emails with LE re same (.2).			
1/27/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1211308	Comms with AG KO re comms with WF re bank termination issues			
1/27/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1211309	Multiple comms with AG re autostay research			

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1/27/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1212265	Communication with AG and LE on Wells Fargo's timing of response			
1/28/25	lebrahimi / Research Automatic Stay Issues	T	2.1 535.00	1,123.50 Billable
#1211302	Research re whether termination of services violates autostay in connection with WF autostay issues			
1/28/25	aglaubach / Research Automatic Stay Issues	T	1.1 1,010.00	1,111.00 Billable
#1211442	Additional research re GWC re: TRO and automatic stay.			
1/29/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1211626	OC with AG RH re autostay research			
1/29/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1211628	OC with AG re comms with WF re status of bank account hold			
1/29/25	lebrahimi / Research Automatic Stay Issues	T	1.3 535.00	695.50 Billable
#1211629	Research re what constitutes exercise over estate property in connection with autostay argument			
1/29/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211859	Call to Wells Fargo re automatic stay papers.			
1/29/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1211876	OC with RH and LE re autostay research.			

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1/29/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211878	TC with Wells Fargo re automatic stay.			
1/29/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1211879	OC with LE re wells fargo and automatic stay.			
1/29/25	rhoward / OC/TC strategy Automatic Stay Issues	T	0.3 1,065.00	319.50 Billable
#1215721	OC with AG and LE re research concerning stay protections against termination of Wells Fargo banking services			
1/29/25	rhoward / Review Docs. Automatic Stay Issues	T	0.9 1,065.00	958.50 Billable
#1215722	Review correspondence from TSS and WF re closure of bank accounts			
1/29/25	rhoward / Research Automatic Stay Issues	T	1.0 1,065.00	1,065.00 Billable
#1215724	Research case law addressing attachment of automatic stay to banking contracts			
1/29/25	rhoward / Exam/Analysis Automatic Stay Issues	T	1.1 1,065.00	1,171.50 Billable
#1215725	Analyze legal issues concerning attachment of automatic stay to banking contracts and Wells Fargo's related arguments			
1/30/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1211916	Review RH research re autostay			
1/30/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212082	Call with WF re autostay issues.			

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1/30/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212083	Email to client re update from WF re autostay issues.			
1/30/25	rhoward / Inter Off Memo Automatic Stay Issues	T	1.3 1,065.00	1,384.50 Billable
#1215727	Draft memo to AG and LE re applicability of Matter of Lee to stay protections against termination of banking services			
1/30/25	rhoward / Exam/Analysis Automatic Stay Issues	T	1.5 1,065.00	1,597.50 Billable
#1215729	Analyze applicability of potential counter arguments of Wells Fargo under Matter of Lee			
1/30/25	rhoward / Review Docs. Automatic Stay Issues	T	0.8 1,065.00	852.00 Billable
#1215730	Review Cash Management Motion and Cash Management Order in connection with autostay issues			
1/30/25	rhoward / Inter Off Memo Automatic Stay Issues	T	0.5 1,065.00	532.50 Billable
#1215731	Draft memo to AG and LE re applicability of potential counterarguments under Matter of Lee			
1/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212711	Emails with RH and LE re global wound care and autostay.			
1/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212715	Call to WF re autostay.			
1/31/25	rhoward / Inter Off Memo Automatic Stay Issues	T	0.2 1,065.00	213.00 Billable
#1215736	Email LE and AG re status of WF termination of banking services			

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2/3/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212753	Call to Wells Fargo re bank account.			
2/3/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1212767	Emails with client re WF updates.			
2/4/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1213979	Message to WF re automatic stay.			
2/5/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1213578	Multiple emails with AG KO and client re change of bank accounts			
2/5/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1213862	Call with WF re account status.			
2/5/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1213864	Email to client re update on call with Wells Fargo re account status.			
2/5/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1213866	Review final cash management order in connection with client request re same.			
2/5/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1213867	Emails with client re cash management and bank account items.			

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2/5/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1213872	Emails with KO re UST approved depository institutions.			
2/6/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1213914	Comms with client re WF account; set up new bank account and scheduling call re same			
2/6/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1214011	Emails with client re opening bank account.			
2/6/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1214021	Emails with client and Dentons re bank account.			
2/7/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1214001	Call with AG KO Client re Wells Fargo issues			
2/7/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1215457	TC with KO in advance of call with client re bank account.			
2/7/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1215460	Call with client, Dentons, and KO re bank account.			
2/20/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1218255	Call with Wells Fargo re automatic stay.			
2/20/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1218258	Follow up TC with Wells Fargo re automatic stay.			

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2/20/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1218262	Email to client and Dentons re WF update.			
2/21/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1217630	Comms with AG KO and client re update from WF re closing of account			
2/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1218290	Internal emails re automatic stay and WF letter.			
2/24/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1218399	Emails with KO re scheduling re call re Wells Fargo.			
2/24/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1218400	Emails with S. Davis re Wells Fargo Call.			
2/25/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1218177	OC with AG re update from WF counsel call			
2/25/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1218411	Emails with KO re Wells Fargo Call and related items re same.			
2/25/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1218416	Call with KO and S. Davis re bank account.			

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2/25/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1218417	TC with KO re call with S. Davis re Bank Account.			
2/25/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1218418	Draft email re update on call with GWC counsel.			
2/28/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1219013	Comms with AG KO and clients re update from WS counsel and schedule call re same			
2/28/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219990	Emails with client re banking relationship.			
2/28/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219994	Internal emails re client email re bank items.			
2/28/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1222250	Communication with S. Davis on Wells Fargo issue and setting up a call			
3/4/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1219617	Call with R. Cetrulo, I. Lee, T. Moyron re: Wells Fargo discussion and timeline for transition			
3/4/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1219631	Call with KO AG and Dentons and clients re update of WF accounts			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/4/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1219705	Call with AG and S. Davis (Winstead) re: Wells Fargo relationship and timing			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1219785	OC with KO in advance of GWC call re same.			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1219787	Call with KO, LE, Dentons, and client re Wells Fargo and next steps re same.			
3/4/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219788	Emails with counsel to WF (Winstead) re call scheduling.			
3/4/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1219796	Call with Winstead and KO re WF account.			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1219797	Follow up call with KO post call with Winstead.			
3/4/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1219801	Draft update email to client re call with WF counsel (Winstead).			
3/11/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222410	Email to client re status of negotiations re banking exception.			

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3/11/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222418	Internal emails with LE with KO re GWC email.			
3/12/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222269	TC with AG re WF account issues; update to autostay motion			
3/12/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222359	TC with KO re next steps in connection with Wells Fargo negotiations.			
3/12/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222360	Email to R. Cetrulo re status of WF negotiations.			
3/12/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222361	Emails with S. Davis (Winstead) re negotiation status.			
3/12/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222362	Emails with Dentons re negotiation status.			
3/12/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222363	Email from client re negotiation status and TC with KO re same.			
3/12/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222364	Call with KO and T. Moyron re case status.			

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3/12/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222365	Follow up call with LE re GWC status.			
3/12/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222366	Emails with KO and LE re GWC materials and status re same.			
3/13/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1222401	E-mail with R. Cetrulo on Wells Fargo and whether account can be shifted			
3/13/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1222466	Multiple OCs with AG re updates to autostay memo of law			
3/13/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1222467	Review prior draft of autostay motion re updates to memo of law re WF account issues			
3/13/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222468	Comms with AG and KO and client re updates from WF counsel			
3/13/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1222476	OC KO AG re updates to memo of law for tro / prelim inj motion			
3/13/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222478	Review AG revised complaint			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/13/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.6 1,010.00	606.00 Billable
#1222770	Updates to TRO complaint.			
3/13/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.2 1,010.00	1,212.00 Billable
#1222777	Updates to complaint re current status with WF.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222783	OC with LE re GWC motion and complaint status.			
3/13/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.5 1,010.00	505.00 Billable
#1222789	Call with KO and S. Davis (Winstead) re next steps.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222794	TC with KO re follow up from call with counsel to WF.			
3/13/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222795	Emails with client re update re WF negotiations.			
3/13/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222797	Email to S. Davis (Winstead) re WF negotiations.			
3/13/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222799	Email to Ankura re banking agreement.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222800	OC with LE re next steps re WF negotiations.			

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3/13/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222805	Emails with KO in advance of GWC call re same.			
3/13/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222813	Review research in connection with autostay.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.5 1,010.00	505.00 Billable
#1222815	OC with KO and LE re GWC and memo / complaint re same.			
3/13/25	aglaubach / Draft Documents Automatic Stay Issues	T	2.7 1,010.00	2,727.00 Billable
#1222818	Additional drafting and revising re memo of law.			
3/14/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1222645	Call with KO AG, Dentons and Client re updates on WF bank account issues			
3/14/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1222752	Multiple comms with AG KO re current draft of TRO / Prelim inj complaint and KO questions re same			
3/14/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222753	Review AG revisions to TRO / Prelim inj complaint and memo of law			
3/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.7 1,010.00	1,717.00 Billable
#1223071	Additional edits and drafting re memo of law.			

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3/14/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1223073	Call with client re next steps re Wells Fargo negotiations.			
3/14/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1223077	Internal emails re revised draft of memo of law.			
3/14/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1223081	Additional internal emails re revised MOL and Complaint.			
3/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.1 1,010.00	1,111.00 Billable
#1223083	Additional revisions and edits to complaint (.7) and research re same (.4).			
3/14/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1223748	Call with R. Cetrulo, I. Lee, T. Moyron and team to discuss how to proceed with Wells Fargo			
3/17/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223127	Comms with JB AG KO BS JMC re question re TRO procedures in connection with motion for TRO / prelim inj.			
3/17/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1223129	Review and revise LE email re GWC documents.			
3/17/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.9 535.00	481.50 Billable
#1223936	Further revise tro / preim inj motion re argument section			

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3/18/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225470	Comms with AG re outstanding research issues in connection with tro / prelim inj motion			
3/20/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1224454	Email to client and Dentons re status of negotiations with DOJ.			
3/21/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1223829	Call with AG in prep for call with Wells Fargo			
3/21/25	kortiz / Comm. Others Automatic Stay Issues	T	0.3 1,295.00	388.50 Billable
#1223842	Call with S. Davis (Winstead) and AG on Wells Fargo dispute and potential for reporting to help same			
3/21/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223927	Comms with AG KO and client re status update for WF counsel and next steps			
3/21/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223928	Comms AG re status update from WF counsel; edits to tro / prelim inj motion			
3/21/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223929	Comms with JB AG re revisions to tro / prelim inj motion			

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3/21/25	lebrahimi / Research Automatic Stay Issues	T	1.3 535.00	695.50 Billable
#1223931	Research 5th circ. precedent tro / prelim inj motions; research local rules re same in connection with JB comments to tro / prelim inj motion			
3/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224472	Call with KO re GWC automatic stay call.			
3/21/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1224473	Call with KO and S. Davis (Winstead) re automatic stay.			
3/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224474	Emails with JB re preliminary injunction motion.			
3/21/25	aglaubach / Research Automatic Stay Issues	T	0.6 1,010.00	606.00 Billable
#1224475	Research re preliminary injunction motion and revising items re same.			
3/21/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224476	Email to client re case re update on call with WF.			
3/21/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1224477	TC with LE re GWC next steps post call with client re same.			
3/21/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224478	Review docket re monthly fee statements and internal emails re same.			

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3/21/25	aglaubach / Research Automatic Stay Issues	T	1.2 1,010.00	1,212.00 Billable
#1224479	Additional research re S.D. Texas caselaw re preliminary injunction.			
3/25/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1224309	OC AG re updates to tro / prelim inj motion			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	0.8 535.00	428.00 Billable
#1224560	Research 5th circuit precedent for TRO / prelim inj			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1224563	Research local S.D. Texas rules re tro / prelim inj motions, adversary proceedings			
3/26/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1224567	OC with AG re 5th circuit precedent tro / prelim inj motions			
3/26/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	1.9 535.00	1,016.50 Billable
#1224569	Revise MOL for tro / prelim inj re update to conform to 5th circuit precedent			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	1.3 535.00	695.50 Billable
#1224761	Research precedent re closing bank account is violation of autostay			
3/26/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225383	Email to S. Davis (Winstead) re MORs.			

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3/26/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225384	Follow up email to client re status update.			
3/26/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225385	Review documents in connection with responding to client.			
3/26/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225387	TC with LE re GWC precedent re complaint and motion.			
3/26/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225464	OC AG re SD Texas local rules in connection with revisions to tro / prelim inj motion			
3/26/25	kortiz / Comm. Others Automatic Stay Issues	T	0.3 1,295.00	388.50 Billable
#1226892	E-mails with AG on reporting and updates relating to Wells Fargo dispute			
3/27/25	lebrahimi / Research Automatic Stay Issues	T	0.9 535.00	481.50 Billable
#1225115	Research 5th circuit case law re circumstance where injunction warranted without violation of autostay			
3/27/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	1.4 535.00	749.00 Billable
#1225121	Further revise MOL for prelim inj / tro re updates 5th cir. case law and circulation to KO AG and JB for review			
3/27/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225460	Comms with AG KO re DOJ reporting requirements in connection with GWC / WF negotiations; review DOJ stip re same			

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3/27/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225907	Internal emails with KO re revisions to DOJ stipulation.			
3/27/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225908	Review revised draft of emergency motion.			
3/28/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225551	Multiple comms with AG KO re update from Wells Fargo counsel re termination of account			
3/28/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225552	Multiple comms with AG KO JMC BFS re review and questions re tro / preliminj motion			
3/28/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225917	Email to client re WF reporting obligations.			
3/28/25	aglaubach / Review Docs. Automatic Stay Issues	T	1.5 1,010.00	1,515.00 Billable
#1226446	Review updated draft of memo of law (1.2) and updates to complaint re same (.3)			
3/29/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1225548	Multiple comms with KO BFS JMC re comments and questions regarding tro / prelim inj motion			
3/30/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225549	OC with KO BFS JMC AG re tro / prelim inj motion			

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3/30/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	1.1 535.00	588.50 Billable
#1225550	OC AG with re revise and update tro / prelim inj brief before circulation to KO for review			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225553	Comms with KO AG and WF counsel re bank account closure discussions			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225554	Comms with KO AG and Dentons re update from WF counsel re bank account and draft pleadings re same			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225555	Call with Dentons re tro / prelim inj pleadings			
3/30/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225706	Review prelim inj. decisions from JMC in connection with updates to motion			
3/30/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225825	Further revise fact section / irreparable harm section of TRO / Prelim inj brief before circulation to KO			
3/30/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1225918	Call with BS, LE, KO and JMC re TRO papers.			
3/30/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	1.1 1,010.00	1,111.00 Billable
#1225920	OC with LE re updates to memo of law.			

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3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225921	Add conforming edits to complaint after updates to memo of law.			
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225923	Internal emails with team re revised documents.			
3/30/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225924	Email to client re revised pleadings.			
3/30/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225925	Email to S. Davis (Winstead) re call scheduling.			
3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225926	Revise memo of law to include KO comments.			
3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225927	Revise complaint to include KO comments.			
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225928	Internal emails with KO and team re revised autostay documents.			
3/30/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225929	Email to client re revised pleadings in advance of call re same.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225930	Emails with team and S. Davis re call scheduling.			
3/30/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1226906	Call with AG, BS, and LE on Wells Fargo Complaint and associated declaration			
3/30/25	kortiz / Review Docs. Automatic Stay Issues	T	0.7 1,295.00	906.50 Billable
#1226907	Review TRO motion			
3/30/25	kortiz / Review Docs. Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1226910	Review and comment on complaint			
3/31/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225659	OC with AG re declaration for tro / prelim inj motion			
3/31/25	lebrahimi / Draft Documents Automatic Stay Issues	T	2.1 535.00	1,123.50 Billable
#1225660	Draft decl for TRO / Prelim inj motion; review draft prelim inj motion, cash management motion and order and FDD re same			
3/31/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225692	Comms with AG re AG edits to tro /prelim inj declaration			
3/31/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225707	Follow up comms with Dentons re status of declarant for TRO / Prelim inj motion			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/31/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225708	Comms with KO AG re declaration for prelim inj / tro motion			
3/31/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225813	Comms with Dentons and client re updates to declaration			
3/31/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1225821	Revise brief tro / prelim inj in connection with updates from draft declaration re same			
3/31/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225935	TC with LE re declaration.			
3/31/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1225942	Review and revise draft declaration re TRO papers.			
3/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225943	Emails with LE re revised declaration.			
3/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225946	Internal communications with LE re declaration and other items.			
Matter Total:		108.90		92,575.50

Matter: Case Status/Strategy

1/22/25	aglaubach / Comm. Client Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1210618	Email to Dentons and client re Wells Fargo update.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/29/25	aglaubach / Comm. Client Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1211886	Email to Dentons and client re WF update.			
3/14/25	aglaubach / Inter Off Memo Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1223069	Emails re call scheduling re: case status.			
3/25/25	aglaubach / OC/TC strategy Case Status/Strategy	T	0.3 1,010.00	303.00 Billable
#1224411	OC with LE re TRO motion and complaint.			
3/26/25	aglaubach / Review Docs. Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1225379	Review docket in connection with recently filed items re autostay motion status			
3/26/25	aglaubach / Inter Off Memo Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1225381	Internal emails with KO and LE re MORs.			

Matter Total: 0.80 808.00

Matter: Research

1/21/25	aglaubach / Inter Off Memo Research	T	0.1 1,010.00	101.00 Billable
#1210385	Emails with JT re research re TRO and preliminary injunction.			

Matter Total: 0.10 101.00

Matter: Retention of Professionals

1/10/25	lebrahimi / Correspondence Retention of Professionals	T	0.2 535.00	107.00 Billable
#1208251	Comms with AG re retention app			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/10/25	lebrahimi / Draft Documents Retention of Professionals	T	0.9 535.00	481.50 Billable
#1208280	draft shell retention app			
1/10/25	aglaubach / Draft Documents Retention of Professionals	T	2.1 1,010.00	2,121.00 Billable
#1208332	Drafting re retention app and review precedent re same.			
1/14/25	aglaubach / Revise Docs. Retention of Professionals	T	0.8 1,010.00	808.00 Billable
#1209158	Additional revisions to retention application.			
1/14/25	aglaubach / Draft Documents Retention of Professionals	T	0.8 1,010.00	808.00 Billable
#1209160	Drafting re company declaration ISO retention application.			
1/14/25	aglaubach / Draft Documents Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1209166	Additional drafting re company declaration.			
1/17/25	aglaubach / Draft Documents Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1209671	Draft attorney declaration re retention.			
1/20/25	aglaubach / Revise Docs. Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1209973	Additional edits re Cetrulo declaration re retention application.			
1/20/25	aglaubach / Draft Documents Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1209974	Drafting re order re retention.			
1/21/25	lebrahimi / Correspondence Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210236	OC w/AG re retention app			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/21/25	lebrahimi / Draft Documents Retention of Professionals	T	0.9 535.00	481.50 Billable
#1210242	Draft Ortiz Declaration Retention App			
1/21/25	lebrahimi / Review Docs. Retention of Professionals	T	0.4 535.00	214.00 Billable
#1210245	Review AG draft retention app and make revisions re same			
1/21/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210289	OC with AG re questions re local rule requirements in connection with Ortiz Declaration			
1/21/25	lebrahimi / Research Retention of Professionals	T	0.3 535.00	160.50 Billable
#1210290	Research re local bankr rules for S.D. Texas in connection with requirement for TSS retention app			
1/21/25	lebrahimi / Draft Documents Retention of Professionals	T	0.5 535.00	267.50 Billable
#1210291	Draft Proposed Order for Retention App			
1/21/25	lebrahimi / Review Docs. Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210293	Review AG draft Cetrulo decl and make revisions re same			
1/21/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1210299	Comms with KO re TSS retention app and declarations for review			
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1210398	OC with LE re GWC retention application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210407	TC with LE re retention application			
1/21/25	aglaubach / Revise Docs. Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1210409	Review and revise Ortiz declaration ISO retention.			
1/21/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210410	Review and revise order re TSS retention.			
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210411	TC with LE re retention papers.			
1/21/25	kortiz / Review Docs. Retention of Professionals	T	0.8 1,295.00	1,036.00 Billable
#1212213	Review and comment on retention application			
1/22/25	lebrahimi / Research Retention of Professionals	T	0.9 535.00	481.50 Billable
#1210445	Research nunc pro tunc relief precedent in S D Texas and local bank rules re same in connection with revisions to TSS retention app			
1/22/25	lebrahimi / Revise Docs. Retention of Professionals	T	0.6 535.00	321.00 Billable
#1210446	Revise TSS Retention App and KO Declaration to implement KO revisions re 2025 rates and nunc pro tunc relief			
1/22/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210447	OC with AG re nunc pro tunc relief precedent in connection with TSS retenton app			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/22/25	lebrahimi / Review Docs. Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210448	Review KO comments to Retention App and Ortiz Decl and comms with KO and AG re same			
1/22/25	aglaubach / Review Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210600	Review KO edits to declaration and retention application (.2) and internal emails with KO and LE re same (.1).			
1/22/25	aglaubach / Research Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1210609	Research (.2) and emails with LE re retention application and edits to same (.2).			
1/22/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210610	TC with LE re edits to retention application.			
1/22/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210619	TC with LE re GWC retention.			
1/22/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210622	Internal emails with KO and LE retention application.			
1/22/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210642	Review revised retention app and revise re same.			
1/22/25	aglaubach / Revise Docs. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210643	Review and revise Ortiz declaration ISO retention application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/22/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210644	internal emails re revised retention pleadings.			
1/23/25	aglaubach / Review Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210654	Review of retention papers and EL in advance of sending same to client and Dentons.			
1/23/25	aglaubach / Comm. Client Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210655	Email to client and Dentons re retention papers.			
1/28/25	aglaubach / Comm. Others Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211467	Call with Dentons re GWC retention application.			
1/29/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211569	Comms with AG DP re update on timing of filing retention papers			
1/29/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211602	Comms with AG KO re Dentons revisions to retention papers			
1/29/25	lebrahimi / Comm. Profes. Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211604	Comms with Dentons re filing retention papers			
1/29/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1211616	OC with AG re issues with retention filing			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/29/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211864	Internal communications with LE and KO re revised retention application.			
1/29/25	aglaubach / Comm. Profes. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211865	Call with Dentons re retention application.			
1/29/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1211866	Review of EL in connection with Ortiz declaration.			
1/29/25	aglaubach / Comm. Profes. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211867	Emails with Dentons re filing retention application.			
1/29/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211869	TC with JC re GWC filings.			
1/29/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1211870	Internal emails with KO and LE re GWC documents .			
1/29/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1211871	TC with LE re GWC retention app issues.			
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.1 560.00	56.00 Billable
#1212806	E-mails with AG and LE re: Status for filing of Retention Application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.1 560.00	56.00 Billable
#1212808	E-mail with JC and AG re: filing related issues for Togut retention application in SD Texas.			
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.2 560.00	112.00 Billable
#1214729	Emails with AG re: Togut Retention Status.			
2/26/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1218792	Internal emails re TSS entered retention order.			

Matter Total: 16.80 14,023.50

Total Time Bill: 107,508.00

Total Time Non Bill:

Total Costs Bill:

Total Costs Non Bill:

Total Non Billable:

Total Billable: 107,508.00

Grand Total: 107,508.00

Exhibit E

Summary of Actual and Necessary Expenses for the Fee Period

Summary of Actual and Necessary Expenses for the Fee Period

Expense	Amount
Online Research	\$203.99
Total:	\$203.99

Exhibit F

BLENDED RATE COMPARISON CHART

BLENDED RATE COMPARISON CHART

Category of Timekeeper	Blended Hourly Rate	
	Billed to Non-Debtors (i.e., Excluding Estate-Billed) ¹	Billed in this fee application
Partners	\$1,384.00	\$1,295.00
Counsel	\$992.00	N/A
Associates	\$896.00	\$812.00
Paralegals	\$459.00	\$560.00
Blended Rate (All timekeepers aggregated)	\$909.00	\$849.00

¹ The Togut Firm is a boutique firm with a single office in New York City that practices exclusively in bankruptcy. Thus, consistent with Appendix B of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Large Chapter 11 Cases, the matters used for comparable compensation are the firm's non-estate billed bankruptcy engagements.