

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a
Professional Corporation,¹

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

Re: Docket No. 110

**CERTIFICATE OF NO OBJECTION FOR
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT
AND RETENTION OF TOGUT, SEGAL & SEGAL LLP AS CONFLICTS COUNSEL
EFFECTIVE AS OF JANUARY 9, 2025**

1. On January 29, 2025 Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession in the above-captioned case (the “Debtor”), filed the *Application For Entry of an Order Authorizing The Employment And Retention of Togut, Segal & Segal LLP as Conflicts Counsel Effective as of January 9, 2025* [Docket No. 110] (the “Application”). Objections to the Application were required to be filed and served on or prior to February 19, 2025 (the “Objection Deadline”).

2. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas*, the undersigned counsel hereby certifies that (i) the Objection Deadline for the Application has passed, (ii) the undersigned counsel is unaware of any objection to the Application, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection or responsive pleading with respect to the Application has been filed.

3. The proposed order (the “Proposed Order”) originally attached to the Application is attached hereto as **Exhibit “A.”**

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



4. Therefore, the Debtor respectfully requests entry of the Proposed Order.

Dated: February 24, 2025

Respectfully submitted,

DENTONS US LLP

/s/ Casey W. Doherty Jr.

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Counsel to the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

This is to certify that I have on February 24, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey W. Doherty Jr.

Exhibit A

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,¹

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**ORDER GRANTING DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF TOGUT, SEGAL &
SEGAL LLP AS CONFLICTS COUNSEL EFFECTIVE AS OF JANUARY 9, 2025**

Upon consideration of the Application (the "Application")² of Global Wound Care Medical Group a Professional Corporation, the debtor and debtor in possession (the "Debtor"), for entry of an order (this "Order"), pursuant to sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Bankruptcy Rules 2014-1 and 2016-1, authorizing the Debtor to employ and retain Togut, Segal & Segal LLP (the "Togut Firm") as conflicts counsel, effective as of January 9, 2025, as more fully set forth in the Application; and upon consideration of the First Day Declaration, the Ortiz Declaration, and the Cetrulo Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 133; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that the venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the Debtor's notice of the Application and opportunity for a hearing on the

¹ The last four digits of the Debtor's tax identification number in the jurisdiction in which it operates is 3572.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Application.

Application were appropriate under the circumstance and no other notice need be provided; and this Court having reviewed the Application and having heard the statements in support of the relief requested therein at a hearing before this Court, if any; and this Court having determined that the legal and factual bases set forth in support of the Application establish just cause for the relief granted herein; and upon all the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Application is approved, as set forth herein.
2. All objections to the Application or the relief requested therein that have not been made, withdrawn, waived, or settled and all reservations of rights included therein, are overruled on the merits.
3. The Debtor is authorized to retain and employ the Togut Firm as conflicts counsel under §§ 327(a) and 328(a) of the Bankruptcy Code, effective as of January 9, 2025, to perform such services detailed in the Application and on the terms set forth in the Application and the Ortiz Declaration.
4. The Togut Firm shall be compensated for professional services rendered and reimbursement of expenses in accordance with the terms set forth in this Order, Application, and Engagement Letter between the Debtor and the Togut Firm attached to the Ortiz Declaration, the terms of which are hereby approved
5. This Order shall be immediately effective and enforceable upon its entry.
6. The Debtor is authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.
7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

DATED: _____, 2025
Houston, Texas

Judge Christopher Lopez
United States Bankruptcy Judge