

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**SUMMARY COVERSHEET TO FIRST INTERIM FEE APPLICATION OF
DENTONS US LLP, ATTORNEYS FOR THE DEBTOR, FOR THE PERIOD FROM
OCTOBER 21, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024**

Name of Applicant:	Dentons US LLP	
Applicant's Role in Case:	Attorneys for Debtor	
Date of Employment Order Signed:	11/26/20/24 [Docket No. 69]	
	Beginning Date	End of Period
Time period covered by this Application:	10/21/24	12/31/24
Time period(s) covered by prior Applications:	N/A	N/A
Total amounts awarded in all prior Applications:	N/A	
Total fees requested in this Application:	\$774,837.10	
Total professional fees requested in this Application:	\$758,929.75	
Total actual professional hours covered by this Application:	812.0	
Average hourly rate for professionals:	\$997.97	
Total paraprofessional fees requested in this Application:	\$15,907.95	
Total actual paraprofessional hours covered by this Application:	39.5	
Average hourly rate for paraprofessionals:	\$402.73	
Reimbursable expenses sought in this Application:	\$8,015.31	
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	



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

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In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**FIRST INTERIM FEE APPLICATION OF DENTONS US LLP, ATTORNEYS FOR
THE DEBTOR, FOR INTERIM ALLOWANCE OF COMPENSATION FOR
PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF ACTUAL
AND NECESSARY EXPENSES INCURRED FROM OCTOBER 21, 2024 THROUGH
AND INCLUDING DECEMBER 31, 2024**

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 TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Dentons US LLP (“Dentons”), attorneys 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 its first application (the “Application”) for interim allowance of compensation for professional services performed by Dentons during the period commencing October 21, 2024 through and including December 31, 2024 (the “Compensation Period”) in the amount of \$774,837.70, and for reimbursement of its actual and necessary expenses incurred during the Compensation Period in the amount of \$8,015.31. Dentons has filed two Monthly Fee Statements as follows: (i) on December 2, 2024, Dentons filed its *First Monthly Fee Statement*, seeking fees of \$375,611.20 and expenses of \$6,113.11, pursuant to which Dentons has been paid \$300,488.96 in fees and \$6,113.11 in expenses, leaving a balance due of \$75,122.24;

and (ii) on February 25, 2025, Dentons filed its *Second Monthly Fee Statement* (the “Second Fee Statement”), on which no amount has yet been paid, seeking payment of \$390,819.20 in fees and \$1,902.20 in expenses.¹ In this Application, Dentons seeks an award of fees of \$774,837.10 and \$8,015.31 in expenses for the Compensation Period.

Preliminary Statement

1. During the Compensation Period, Dentons, as counsel to the Debtor, was instrumental in addressing the significant obstacle facing the continued operational success of the Debtor – the total suspension of payments related to the Debtor’s provision of wound care and related medical care to Medicare beneficiaries nationwide (the “Payment Suspension”). To forestall the inevitable cessation of operations which would have been necessitated by the Payment Suspension, Dentons (a) filed a bankruptcy petition, as well as all necessary first day motions, and (b) coordinated closely with Wound Pros Management Group, Inc. (“Wound Pros”), the Debtor’s Management Services Organization (the “MSO”) which is the Debtor’s sole creditor and the manager of the Debtor’s operations. Shortly after the filing, Dentons immediately engaged in intense negotiations with attorneys from the US Department of Justice’s Corporate/Financial Litigation Section and Fraud Section, as well as the US Attorney’s Office for the Eastern District of California (collectively, “DOJ”), all of whom represent the US Department of Health & Human Services’ Centers for Medicare & Medicaid Services (collectively, the “United States”). These negotiations led to the Debtor entering into a *Stipulation by Global Wound Care Medical Group, a Professional Corporation, and the United States Department of Justice Regarding Suspension*

¹ The Second Monthly Fee Statement was filed on February 25, 2025 [Docket No. 126]; 80% of the fees in the amount of \$319,381.20 and 100% of the expenses in the amount of \$1,902.20, are not payable to Dentons until March 11, 2025, in accordance with the *Order Granting Debtor’s Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 26].

of Medicare Payments by the United States Department of Health and Human Services [Docket No. 87] (the “Stipulation”). The Stipulation reinstated payment by Medicare of 75% of receivables, restoring the Debtor’s ability to maintain operations while negotiating a global settlement of all issues raised by the United States. As of the filing of this Fee Application, those negotiations are still ongoing and the Debtor is optimistic that a settlement will be reached.

2. The professional services performed and expenses incurred by Dentons during the Compensation Period were actual and necessary to preserve and protect the value of the Debtor’s estate and minimize any negative impact of the restructuring. Given the circumstances of this Case, Dentons’ charges for professional services performed and expenses incurred are reasonable and appropriate under applicable standards. Dentons respectfully requests that the Court grant this Application and allow interim compensation for professional services performed and reimbursement for expenses incurred.

Relief Requested

3. 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 Order”). The Debtor requests approval of this Application.

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

Jurisdiction

5. 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

6. On October 21, 2024, (the “Petition Date”), the Debtor commenced this 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.

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

8. 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.

9. The Debtor is managed and supported by Wound Pros, a leader in wound care management and standardization that is an accredited supplier of durable medical equipment, prosthetics, orthotics, and supplies (“DMEPOS”) and biologics. As an MSO, Wound Pros, through a Management Services Agreement (“MSA”), provides the Debtor with non-clinical administrative and management services, including assisting in the recruitment, training and development of staff; providing financial and revenue cycle support, including accounting, billing, budgeting and collection services; regulatory compliance; negotiations with payors; credentialing;

marketing; real estate and equipment leasing; employment of non-clinical staff; drug and durable medical equipment supply chain services; and acquiring insurance. The Debtor also licenses the Wound Pros name. The relationship between medical groups and MSOs such as in this case is ubiquitous in the healthcare industry.

10. 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").²

Debtor's Retention of Dentons

11. On October 25, 2024, the Debtor filed the *Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Dentons US LLP as Bankruptcy Counsel Effective as of the Petition Date* [Docket No. 25] (the "Retention Application"). On November 26, 2024, the Court entered the *Order Approving Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Dentons US LLP as Bankruptcy Counsel Effective as of the Petition Date* [Docket No. 69] (the "Retention Order").

Summary of Professional Compensation and Reimbursement of Expenses Requested

12. Dentons seeks interim allowance of compensation for professional services performed during the Compensation Period in the amount of \$774,837.70 and reimbursement of expenses incurred in connection with the rendition of such services in the amount of \$8,015.31. During the Compensation Period, Dentons attorneys, paraprofessionals, and other nonlegal staff expended a total of 851.50 hours in connection with the necessary services performed. As an

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

exercise of its billing judgment, during the Compensation Period Dentons voluntarily reduced the amount of fees requested by \$51,292.10.

13. There is no agreement or understanding between Dentons and any other person, other than members of the firm, for the sharing of compensation to be received for services rendered in this Case. During the Compensation Period, Dentons received payment from the Debtor pursuant to one Monthly Fee Statement, in accordance with the Interim Compensation Order.

14. Dentons has filed two Monthly Fee Statements, on December 2, 2024 [Docket No. 74] and on February 25, 2025 [Docket No. 126], 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 October 21st -- November 25th	\$375,611.20	\$300,488.96	\$6,113.11	\$6,113.11
Second Statement November 26th -- December 31st	\$399,226.50	Objection Period Runs March 11th	\$1,902.20	Objection Period Runs March 11th

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

16. The fees charged by Dentons in this Case are billed in accordance with Dentons’ existing billing rates and procedures in effect during the Compensation Period. The rates Dentons charges for the services rendered by its professionals and paraprofessionals in this Case are no greater than the rates Dentons charges for professional and paraprofessional services rendered in

comparable bankruptcy and non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable bankruptcy and non-bankruptcy matters in a competitive national legal market.

Supporting Documents

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

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

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

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

21. Attached hereto as **Exhibit “F”** is a summary and comparison of the aggregate blended hourly rates billed by Dentons’ timekeepers to non-bankruptcy matters during the prior

twelve-month period ending December 31, 2024, and the blended hourly rates billed to the Debtor during the Compensation Period (the “Blended Rate Comparison Chart”).

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

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

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

Summary of Services Performed by Dentons During the Compensation Period

25. During the Compensation Period, Dentons devoted substantial resources and rendered significant professional services to ensure that, among other things, the Debtor would be able to transition seamlessly into chapter 11, operate its business without interruption, continue receiving services from certain key critical vendors, and advance settlement discussions with key stakeholders. The following is a summary of the significant professional services, among others, rendered by Dentons during the Compensation Period, organized in accordance with Dentons’ internal time-tracking system, and broken down by project or task codes:

a. Case Administration (Task Code B110)
Fees: \$226,972.80; Total Hours: 233.6

During the Compensation Period, Dentons: assisted Issac Lee, the Debtor's Chief Restructuring Officer, and Ankura Consulting Group, LLC, the Debtor's Financial Advisor ("Ankura") in filing the *Schedules* and *Statement of Financial Affairs* [Docket Nos. 75, 76]; assisted Kurtzman Carson Consultants, LLC, in preparing and filing the *Master Service List* [Docket No. 59]; represented the Debtor in its participation in the Meeting of Creditors conducted by the UST; represented the Debtor in its initial interview with the UST; and assisted the Debtor and Ankura in filing the first *Debtor-in-Possession Monthly Operating Report* [Docket No. 97]. Dentons also participated in (a) daily zoom conferences with the Chief Financial Officer, Ralph Cetrulo, and various other officers of the Debtor, as well representatives of the MSO and Ankura, to address the myriad issues which arise in a bankruptcy case under chapter 11 and which arose because of the Payment Suspension; and (b) regular zoom conferences with the MSO's General Counsel, initially Keith Greer, then subsequently Raymond Millien, who took over the responsibilities of General Counsel during the Case.

b. Asset Analysis and Recovery (Task Code B120)
Fees: \$2,409.75; Total Hours: 3.7

Dentons conducted searches of all liens (UCC searches) recorded against the Debtor in the twenty states where the Debtor was licensed to do business, reviewing, in particular, the UCC search obtained for the State of Georgia; prepared E-Mails to G. Liwanag regarding the lien searches; exchanged information internally on the lien searches; and analyzed the results of the searches. Also billed to this Category of Services was Dentons' review of information regarding preparation of the Debtor's *Schedules of Assets and Liabilities*.

- c. Meetings of and Communications with Creditors (Task Code B150)
Fees: \$548.55; Total Hours: 0.5

Dentons conducted a telephone conference with D. Lemke, who is counsel for 180 Health Services, on pending issues and exchanged E-Mails with Mr. Lemke regarding the status of negotiations with the DOJ on the Payment Suspension.

- d. Fee Applications/Employment Applications (Task Code B160)
Fees: \$115,526.70; Total Hours: 140.1

In connection with the employment as counsel for the Debtor, on October 25, 2024, Dentons prepared and filed the Retention Application which, on November 26, 2024, this Court granted through its Retention Order.

Concurrently with filing its Retention Application, Dentons prepared and filed *Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 26], which this Court granted on November 26, 2024, in its *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].

In accordance with the order establishing procedures for compensation, Dentons filed its *First Monthly Fee Statement of Dentons US LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtor* for the period from October 21, 2024 through November 25, 2024, on December 2, 2024 [Docket No. 74]; then filed its *Second Monthly Fee Statement of Dentons US LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtor for the Period of November 26, 2024 Through December 31, 2024*, on February 25, 2025 [Docket No. 126].

Also during the Compensation Period, Dentons commenced the preparation of its Third Monthly Fee Statement, for the period of January 2025.

Dentons also prepared (a) the *Application for Entry of an Order Authorizing the Employment and Retention of Ankura Consulting Group, LLC, as Financial Advisor*, filed on November 5, 2024 [Docket No. 47]; (b) the *Supplemental Application for Entry of an Order Authorizing the Employment and Retention of Ankura Consulting Group, LLC, to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024*, filed on December 8, 2024 [Docket No. 82]; and (c) the *Emergency Motion for Entry of an Order Authorizing Ankura Consulting Group, LLC, to Provide a Chief Restructuring Officer to the Debtor Effective as of November 26, 2024* [Docket No. 88], on which an Order approving the applications was entered January 14, 2025 [Docket No. 105].

e. Other Contested Matters (Task Code B190)
Fees: \$747.90; Total Hours: 1.0

Included in this Category of Service, Dentons prepared for, attended and analyzed the results of hearings on First Day Motions, including the: (a) *Emergency Motion of Debtor for Entry of an Order Authorizing Payment of Certain Prepetition (I) Wages, Salaries, and Other Compensation; (II) Reimbursable Employee Expenses; (III) Employee Benefits; and (IV) Related Costs* [Docket No. 5] (the “Wage Motion”); (b) the *Emergency Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue Using Its Cash Management System, and (B) Maintain Existing Bank Account and Business Forms and Books and Records, and (II) Granting Related Relief* [Docket No. 6]; and (c) the *Emergency Motion of Debtor for Entry of an Order (I) Authorizing the Debtor to (A) Maintain Insurance Program and (B) Pay Insurance Obligations in the Ordinary Course; and (II) Preventing Insurance Companies from Enforcing Ipso Facto Clauses or Giving Any Notice of Termination or Otherwise Modifying Any Insurance Policy without Obtaining Relief from the Automatic Stay* [Docket No. 7]. Dentons also exchanged

E-Mails and had telephone calls with the Debtor's General Counsel, Ray Millien, regarding an agreement between the Debtor and Wound Pros.

- f. Non-Working Travel (Task Code B195)
Fees: \$31,292.10; Total Hours: 29.70; Fees Charged: \$0.00

Partners Samuel Maizel and Tania Moyron travelled to and from Washington, D.C., for meetings with the DOJ and HLB attorneys regarding the Payment Suspension and other CMS issues. **The fees incurred were \$31,292.10. As set forth in its *First Monthly Fee Statement*, Dentons wrote off the fees incurred for travel time.**

- g. Business Operations (Task Code B210)
Fees: \$1,913.40; Total Hours: 1.8

Included within this Category of Service, Dentons analyzed the status of the Debtor's account at Wells Fargo Bank, and exchanged E-Mails with Mr. Cetrulo regarding the Wells Fargo account. Dentons also participated in a conference call with HLB attorneys, as well as Mr. Cetrulo, the Debtor's Chief Human Resources Officer, Kenya Manning, and Keith Greer, regarding the possible restructuring of the Debtor's business operations. Finally, Debtor had internal discussions regarding possible restructuring options.

- h. Employee Benefits/Pensions (Task Code B220)
Fees: \$886.95; Total Hours: 0.9

Dentons prepared and filed the *Order Granting Debtor's Emergency Motion for Entry of an Order Authorizing Payment of Certain Prepetition (I) Wages, Salaries, and Other Compensation; (II) Reimbursable Employee Expenses; (III) Employee Benefits; and (IV) Related Costs* [Docket No. 39]; conducted conferences regarding the terms of the Order; and prepared and filed a Revised Order [Docket No. 48].

- i. Claims Administration and Objections (Task Code B310)
Fees: \$15,619.95; Total Hours: 16.2

Dentons reviewed the Master Servicing Agreement regarding Wound Pros' possible secured claim; exchanged internal E-Mails regarding the secured claim; conducted telephone calls regarding the lien searches; and, prepared the *Motion of Debtor for Entry of an Order (I) Establishing Deadlines and Procedures for Filing Proofs of Claim; (II) Approving Form and Manner of Notice Thereof; and (III) Granting Related Relief* [Docket No. 115], a proposed Order on the motion, and notices relating to the proposed bar date.

- j. General Bankruptcy Advice (Task Code B410)
Fees: \$1,170.45; Total Hours: 1.7

Dentons reviewed the organizational and corporate structure of the Debtor, responded to questions on the Debtor's corporate structure, and prepared and reviewed revisions to appointment resolutions which included an exchange of E-Mails regarding appointment resolutions.

- k. Employment (Task Code EMP)
Fees: \$16,918.65; Total Hours: 16.7

Included in this Category of Service is: additional work revising the Wage Motion; exchanged E-Mails regarding revisions to the Wage Motion; exchanged E-Mails regarding preparation and status of the Order on the Wage Motion; reviewed and responded to E-Mails with the DOJ on DOJ's comments to the proposed order on the Wage Motion; analyzed E-Mails regarding the Wage Motion; prepared a Notice on the revised Order on the Wage Motion; participated in multiple telephone conferences regarding employment issues; reviewed and responded to E-Mails regarding employment agreements; reviewed and responded to E-Mails regarding a Succession Agreement; reviewed and assessed the content of the proposed Succession Agreement; reviewed and considered questions regarding the status of employees following change of employment to a new company; considered a proposed revised Medical Director

Agreement; conferred regarding pending employment issues; reviewed the Ellington Employment Agreement; conducted conferences with HLB attorneys and R. Cetrulo regarding the Ellington Employment Agreement; participated in a conference with K. Manning on the Ellington Employment Agreement; considered the status of certain service providers as contractors or employees and related legal implications as to those contractors and employees; researched employment exemptions related to issues; and considered an employee/contractor issue.

1. Medicare/CMS Issues (Task Code MED/CMS)
Fees: \$412,122.60; Total Hours: 405.60

As described in the introduction to this Fee Application, the Payment Suspension instituted by the United States placed the Debtor in an existential crisis. Because Medicare payments represented more than 90% of its income, the total suspension of Medicare payments, coupled with the lack of feasible remedies available outside of bankruptcy, forced the decision by the Debtor to commence a bankruptcy proceeding. As soon as the case commenced, Dentons engaged in negotiations with counsel for the United States, with the first zoom conference with the United States' bankruptcy counsel occurring *before* the First Day hearing on October 24, 2025. These zoom conferences continued the day after the First Day hearing on October 25, 2025, and regularly throughout the Compensation Period, and included HLB attorneys, Ankura representatives, and representatives of the Debtor and the MSO. In preparation for each zoom conference, Dentons worked with the Debtor, representatives of the MSO, Ankura, and HLB attorneys to prepare for the conference, respond to various questions for information or analysis, etc. Additionally, Dentons and HLB conducted an in-person meeting with counsel for the United States in Washington, D.C. After intense negotiations, which at times included other representatives of various legal agencies and law enforcement agencies of the federal government, Dentons, in consultation with HLB and representatives of the MSO, negotiated the Stipulation which, among

other things, required the Debtor to appoint a Chief Restructuring Officer, make disbursements only in accordance with an approved budget, and provide weekly financial reports, but most importantly, required the United States to restore 75% of the Medicare payments, which provided sufficient liquidity to allow the Debtor to continue negotiations with the United States towards a global settlement.

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

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

28. The professional services performed by Dentons' partners, counsel, associates, and paraprofessionals were rendered by the Restructuring, Corporate, Litigation, and Tax, Employment Law Departments in several of Dentons' offices. Dentons has a preeminent Restructuring practice and enjoys a national reputation for its expertise in financial reorganizations and restructurings of distressed healthcare industry entities.

29. The professional services performed by Dentons on behalf of the Debtor during the Compensation Period required an aggregate expenditure of approximately 851.5 hours by Dentons' partners, counsel, associates, paraprofessionals, and other non-legal staff. Of the aggregate time expended, approximately 703.5 recorded hours were expended by partners and counsel of Dentons, approximately 108.5 recorded hours were expended by associates, and

approximately 39.5 recorded hours were expended by paraprofessionals and other non-legal staff of Dentons.

30. During the Compensation Period, Dentons billed the Debtor for time expended by attorneys based on hourly rates ranging from \$396.00 to \$1,431.00 per hour for attorneys. Allowance of compensation in the amount requested would result in a blended hourly billing rate for Dentons attorneys in this Application of approximately \$997.69 (based on 812 recorded hours for attorneys at Dentons' billing rates in effect at the time of the performance of services).

Actual and Necessary Disbursements of Dentons

31. As set forth in **Exhibit "E"** attached hereto, Dentons has disbursed \$8,015.31 as expenses incurred in providing professional services during the Compensation Period. These expenses are reasonable and necessary and were essential to the overall administration of this Case.

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

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

34. Dentons has made every effort to minimize its disbursements in this Case. The actual expenses incurred in providing professional services were those that were necessary,

reasonable, and justified under the circumstances to serve the needs of the Debtor and its estate and creditors.

Requested Compensation Should Be Allowed

35. Section 331 of the Bankruptcy Code provides for interim compensation of professionals and incorporates the substantive standards of section 330 of the Bankruptcy Code to govern the Court's award of such compensation. Section 330(a)(1) of the Bankruptcy Code provides that a Court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered [and] reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1).

36. The Court should consider six factors found in section 330(a)(3) of the Bankruptcy Code when awarding compensation to professionals. *See In re Crager*, 691 F.3d 671, 676 (5th Cir. 2012). Specifically, under section 330 of the Bankruptcy Code, courts "shall consider the nature, the extent, and the value of such services, taking into account all relevant factors," including --

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

11 U.S.C. § 330(a)(3).

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

38. Compensation for the foregoing services as requested is commensurate with the complexity, importance, and nature of the issues and tasks involved. Not only were Dentons' professional services performed skillfully and efficiently, but whenever possible Dentons sought to minimize the cost of its services to the Debtor by utilizing junior attorneys and paraprofessionals to handle the more routine aspects of case administration. In addition, the same Dentons attorneys were utilized for similar tasks in this Case to minimize the fees associated with intra-Dentons communication and familiarization with the Case. As described above, the complexity of this Case required the use of specialists in Medicare, litigation, labor and employee benefits, and other areas, to achieve the progress the Debtor has reached thus far in this Case.

39. In sum, the services rendered by Dentons were necessary and beneficial to the Debtor's estate and were consistently performed in a timely manner commensurate with the types of issues involved in this chapter 11 case. Accordingly, approval of the compensation for professional services and reimbursement of expenses sought in this Application is warranted.

Notice

40. Notice of this Application will be provided in accordance with the procedures set forth in the Interim Compensation Order, to include:

- 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@woundpros.com);

- b. Raymond Millien, General Counsel, Wound Pros Management Group, 5901 West Century Boulevard, Suite 750, Los Angeles, California 90045 (raymond.millien@woundpros.com);
- c. Office of the U.S. Trustee for the Southern District of Texas, Attn: Ha Nguyen, 515 Rusk Street, Suite 3516, Houston, Texas 77002 (ha.nguyen@usdoj.gov); and
- d. any other parties that the Court may designate.

The Debtor respectfully submits that no further notice is required.

Conclusion

41. Dentons respectfully requests that the Court award interim allowance of Dentons' compensation for professional services rendered during the Compensation Period in the amount of \$774,837.70, representing 100% of fees incurred during the Compensation Period, and reimbursement in the amount of \$8,015.31, representing 100% of actual and necessary expenses incurred during the Compensation Period, and that such allowance be without prejudice to Dentons' right to seek additional compensation for services performed and expenses incurred during the Compensation Period in the event such fees and expenses were not processed at the time of this Application and grant such other and further relief as is proper and just.

Dated: February 28, 2025
Houston, Texas

/s/ Casey S. Doherty, Jr.
Casey S. Doherty, Jr.
Dentons US LLP
1300 Post Oak Boulevard, Suite 650
Houston, Texas 77056
Phone: 713 658 4600
Email: casey.doherty@dentons.com

Samuel R. Maizel (*admitted pro hac vice*)
Tania M. Moyron (*admitted pro hac vice*)
Dentons US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704

Phone: 213 623 9300

Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

Counsel to the Debtor and Debtor-in-Possession

Certificate of Service

I hereby certify that on February 28, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey S. Doherty, Jr.

Exhibit A

Proposed Order

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

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

The Court has considered the *First Interim Application of Dentons US LLP* (the “Applicant”), *Attorneys for Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 21, 2024 Through and Including December 31, 2024* (the “Application”) filed by Dentons US LLP (the “Applicant”). The Court orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$_____ for the period set forth in the application.
2. The Debtor is authorized to disburse any unpaid amounts allowed by paragraph 1 of this order to the Applicant.

Dated: _____, 2025
Houston, Texas

CHRISTOPHER LOPEZ
UNITED STATES BANKRUPTCY JUDGE

Exhibit B

Certification of Counsel

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP,
a Professional Corporation,

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**CERTIFICATION OF SAMUEL R. MAIZEL IN SUPPORT OF FIRST INTERIM FEE
APPLICATION OF DENTONS US LLP AS ATTORNEYS FOR THE DEBTOR, FOR
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED
AND REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
FROM OCTOBER 21, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024**

I, Samuel R Maizel, hereby certify that:

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

2. This certification (“Certification”) is made in connection with the *First Interim Fee Application of Dentons US LLP, Attorneys for Debtor, for Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from October 21, 2024 Through and Including December 31, 2024* (the “Application”) filed February __, 2025, for compensation and reimbursement of expenses for the period commencing October 21, 2024 through and including December 31, 2024, (the “Compensation Period”). I have reviewed the Application and hereby certify that the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and Fee Guidelines.

3. I certify that Dentons has complied with provisions of the *Order Granting Motion Establishing Procedures for Interim Compensation and Reimbursement of Expenses of*

Professionals (Docket No. 68) requiring it to provide the Debtor and the United States Trustee for the Southern District of Texas (the “U.S. Trustee”) with monthly statements of Dentons’ fees and disbursements accrued during the Compensation Period.

4. Dentons discussed its rates, fees, and staffing with the Debtor at the outset of this case and has continued to discuss staffing and fees with the Debtor throughout this case. Attorneys and paraprofessionals assigned to this matter were necessary to assist with the prosecution of the Debtor’s chapter 11 case, preservation of the Debtor’s assets, and other matters described herein. The budget prepared in connection with Dentons’ representation of the Debtor in this chapter 11 case and a summary of the staffing plan are attached to the application at Exhibit G and Exhibit H respectively.

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

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

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

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

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

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

Answer: No.

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

Answer: No.

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

Answer: No descriptions were redacted.

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

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

Dated: February 28, 2025
Los Angeles, California

/s/ Samuel R. Maizel

Samuel R. Maizel
Dentons US LLP

Exhibit C

Schedules of Professional Fees

COMPENSATION BY PROFESSIONAL
OCTOBER 21, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024

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

NAME OF PROFESSIONAL	POSITION	DEP'T	YEAR ADMITTED ¹	HOURLY BILLING RATE ²	TOTAL BILLED HOURS	TOTAL COMPENSATION
Samuel R. Maizel	Partner	RIB ³	1997	\$1,125.00	245.2	\$275,850.00
Tania M. Moyron	Partner	RIB	2005	\$985.50	303.9	\$299,493.45
Thomas Labuda	Partner	RIB	1994	\$1,431.00	1.4	\$2,003.40
Claude Montgomery	Partner	RIB	1978	\$1,386.00	.5	\$693.00
Sandra R. McCandless	Partner	E&L ⁴	1973	\$1,039.50	5.8	\$6,029.10
Sean C. Cenawood	Partner	HC ⁵	1992	\$1,197.00	4.7	\$5,625.90
Drew W. Marrocco	Partner	CL ⁶	1995	\$1,183.50	2.3	\$2,722.05
Neil Hare	Partner	PP ⁷	1997	\$1,125.00	4.3	\$4,737.50
Sam J. Alberts	Partner	RIB	1992	\$1,107.00	.3	\$332.10
Marci R. Borenstein	Partner	HC	1995	\$990.00	.5	\$495.00
John A. Moe, II	Partner	RIB	1975	\$904.50	39.3	\$35,546.85
Geoffrey M. Miller	Partner	RIB	2012	\$891.00	49.5	\$44,104.50
R. Matthew Garms	Partner	CTPC ⁸	1999	\$688.50	3.2	\$2,203.20
Casey Doherty, Jr.	Counsel	RIB	2011	\$886.50	42.6	\$37,764.90
Sarah M. Schrag	Associate	RIB	2016	\$963.00	30.2	\$29,082.60
David F. Cook	Associate	RIB	2017	\$855.00	49.9	\$42,664.50
Samantha Ruben	Associate	RIB	2019	\$751.50	26.8	\$20,140.20
Jacob Margolies	Associate	CL	2021	\$396.00	1.6	\$633.60
Total:					812.0	\$810,121.85

¹ * - Not yet admitted.

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

³ Restructuring, Insolvency and Bankruptcy.

⁴ Employment and Labor.

⁵ Health Care.

⁶ Commercial Litigation.

⁷ Public Policy.

⁸ Corporate, Tax, Private Client.

The paraprofessionals and other non-legal staff who rendered professional services in this chapter 11 case during the Compensation Period are:

NAME OF PARAPROFESSIONAL AND OTHER NON-LEGAL STAFF	POSITION	DEP'T	HOURLY BILLING RATE	TOTAL BILLED HOURS	TOTAL COMPENSATION
Dianne Nichols	Senior Paralegal	RIB	\$423.00	2.6	\$1,099.80
George L. Medina	Senior Paralegal	RIB	\$418.50	13.4	\$5,607.90
Kathryn Howard	Senior Paralegal	RIB	\$391.50	23.5	\$9,200.25
Total:				39.5	\$15,907.95

The total fees for the Compensation Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Partners	\$1,028.65	660.9	\$679,836.05
Counsel	\$886.50	42.6	\$37,764.90
Associates	\$852.73	108.5	\$92,520.90
Paraprofessionals and Other Non-Legal Staff	\$402.73	39.5	\$15,907.95
Blended Attorney Rate	\$997.69	812.0	\$810,121.85
Blended Rate for All Timekeepers	\$909.97	851.5	\$774,837.70 ⁹

⁹ The \$774,837.70 reflects that Dentons wrote off compensation for time spent in travel totaling \$31,292.10 plus an additional writeoff of \$20,000.00 from B160 – Fee Applications/Employment Applications.

COMPENSATION BY PROJECT CATEGORY
OCTOBER 21, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024

TASK CODE	PROJECT CATEGORY	TOTAL BILLED HOURS	TOTAL COMPENSATION
B110	Case Administration	233.6	\$226,972.80
B120	Asset Analysis and Recovery	3.7	\$2,409.75
B150	Meetings of and Communication with Creditors	.5	\$548.55
B160	Fee Applications/Employment Applications	140.1	\$115,526.70
B190	Other Contested Matters (excluding assumption/rejection motions)	1.0	\$747.90
B195	Non-Working Travel	29.7	\$31,292.10
B210	Business Operations	1.8	\$1,913.40
B220	Employee Benefits/Pensions	.9	\$886.95
B310	Claims Administration and Objections	16.2	\$15,619.95
B410	General Bankruptcy Advice/Opinions	1.7	\$1,170.45
EMP	Employment	16.7	\$16,918.65
MED/CMS	Medicare/CMS Issues	405.60	\$412,122.60
	Subtotal	851.5	\$826,129.80
	Discounted Fees ¹⁰		(\$31,292.10)
	Additional Writeoff		(\$20,000.00)
TOTAL:		851.5	\$774,837.10

¹⁰ Dentons wrote off compensation for time spent in travel totaling \$31,292.10 plus an additional writeoff of \$20,000.00 from B160 – Fee Applications/Employment Applications.

Exhibit D

Time Records

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS

First Fee Application								
Date Served	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested
		Fees	Expenses	Fees (@80%)	Fees (@100%)	Fees (@80%)	Fees (@100%)	Fees (@20%)
12/02/2024	10/21/24-11/25/24	\$375,611.20	\$6,113.11	\$300,488.96	\$375,611.20	\$300,488.96		\$75,122.24
	11/26/24-12/31/24	\$399,226.50	\$1,902.20	\$319,381.20	\$399,226.50			\$79,845.30
Total for First Fee Application		\$774,837.70	\$8,015.31	\$619,870.16	\$774,837.70	\$300,488.96		\$154,967.54

Summary of Any Objections to Monthly Fee Statements: None¹¹

Compensation Sought in this Application Not Yet Paid: \$154,967.54

¹¹ The objection deadline with respect to Dentons' Second Monthly Fee Statement is March 11, 2025, at 4:00 p.m. (Central Time). Once the objection deadline has passed without objection, the Debtor is authorized to pay Dentons \$319,381.20 in fees (80% of \$399,226.50) and \$1,902.20 in expenses.

Two Invoices Attached to the First Monthly Fee Statement

DENTONS

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

dentons.com

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

November 25, 2024

Invoice No. 2802660

Client: 15816151

Payment Due Upon Receipt

Total This Invoice \$ 203,955.61

Please return this page with your payment
 To pay by E-Check - <https://www.e-billexpress.com/ebpp/DentonsUS>

Payments by check should be sent to:

Dentons US LLP
 Dept. 3078
 Carol Stream, IL 60132-3078

OR

Payment by wire transfer/ACH should be sent to:

Citi Private Bank
 227 West Monroe, Chicago, IL 60606
 ABA Transit #: 271070801
 Account #: 0801051693
 Account Name: Dentons US LLP
 Swift Code: CITIUS33
 Reference Invoice # and/or Client Matter #

****Please validate any request to change/update electronic payment instructions on
 file or mailing address by contacting Dentons US LLP directly****

Please send payment remittance advice information to cashreceipts@dentons.com
 In order to guarantee proper allocation of payments

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730
 Questions relating to this invoice should be directed to:
 S. Maizel
 at 1 213 623 9300

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

November 25, 2024

Invoice No. 2802660

For Professional Services Rendered through October 31, 2024:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/24	T. Moyron	0.30	295.65	B110	Calls and emails with K. Greer regarding final changes to first-day motions.
10/21/24	T. Moyron	1.20	1,182.60	B110	Attention to finalization of first-day motions, including updated notices.
10/21/24	T. Moyron	0.60	591.30	B110	Analyze and finalize application to employ KCC.
10/21/24	T. Moyron	0.40	394.20	B110	Analyze final version of First-Day Motion and provide final comment thereto.
10/21/24	T. Moyron	0.30	295.65	B110	Correspond with K. Manning, et al., regarding filings and first-day motions.
10/21/24	C. Doherty, Jr.	3.00	2,659.50	B110	Review and prepare first day and second day motions and provide comments concerning conformance with first day procedures (1.4); review and respond to emails concerning local procedures, rules and filing practices (1.4); calls with T. Moyron and S. Maizel re filing and setting of first day hearing (.2)
10/22/24	D. Thomas-Nichols	0.30	126.90	B110	Review witness and exhibit list, agenda for first day hearing and notice of first day hearing (.1); revise witness and exhibit list (.1); correspond with C. Doherty with revisions re witness and exhibit list (.1).
10/22/24	S. Schrag	0.10	96.30	B110	Review correspondence regarding US Trustee guidelines.

Global Wound Care Medical Group, A Professional Corporation
 Matter: 15816151-000002
 Invoice No.: 2802660

November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	T. Moyron	1.00	985.50	B110	Analyze and prepare comment to notice of first-day hearing (.2); correspond with C. Doherty re same (.2); analyze and provide comment to witness and exhibit list (.2); attention to correspondence regarding witness list, agenda, and First-Day Hearing with C. Doherty, et al. (.4).
10/22/24	T. Moyron	0.30	295.65	B110	Attention to 7-Day package and correspondence with I. Lee, et al., re same.
10/22/24	T. Moyron	0.60	591.30	B110	Analyze and prepare workstream memo in connection with coordination of case.
10/22/24	T. Moyron	0.40	394.20	B110	Attention to OCP and Knudsen motions.
10/22/24	T. Moyron	0.60	591.30	B110	Correspondence and calls with KCC, G. Medina, et al., regarding creditors and creditor matrix.
10/22/24	T. Moyron	0.90	886.95	B110	Calls with S. Maizel regarding pending issue and emergency motions.
10/22/24	T. Moyron	0.70	689.85	B110	Correspond with M. Cutts, et al., regarding public affairs and communication team and Zoom regarding same and GWC needs (.5); correspond with K. Manning and R. Cetrulo re same (.2).
10/22/24	T. Moyron	0.90	886.95	B110	Correspondence with G. Medina, KCC, et al., regarding creditors, creditor matrix, and related matters (.7); calls regarding same and filing and uploading of matrix with J. Morrow, KCC, G. Medina, et al. (.2).
10/22/24	S. Ruben	1.20	901.80	B110	Draft declaration in support of adversary complaint (.3); correspond with T. Moyron re Ankura employment application (.1); draft Ankura employment application (.8).
10/22/24	K.M. Howard	0.40	156.60	B110	Review documents regarding the firm's retainer and drawn down amount (.1); revise Disclosure of Attorney Compensation (.3).
10/22/24	K.M. Howard	0.30	117.45	B110	Review emails from J. Morrow and S. Maizel regarding creditors listed mailing matrix (.1); prepare response thereto (.1); followup email exchanges with J. Morrow regarding Greer & Associates (.1).

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2802660

November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	K.M. Howard	0.30	117.45	B110	Review corporate documents assemble from the California Secretary of State including uploading each into document management database.
10/22/24	C. Doherty, Jr.	2.90	2,570.85	B110	Prepare second-day documents of hearing notices, witness and exhibit list and agenda, review and respond to emails concerning same and supervise filing of documents (1.5); prepare for first day hearing and respond to questions regarding local procedure regarding same and contact court regarding hearing (.2); review and respond to email regarding Dentons application, Knudsen motion and OCP Motion (.2); review and respond to questions from clerk and Texas Attorney general regarding bankruptcy (.2); review draft of SOFA and Schedule draft and provide comments concerning same and procedure regarding motions (.3); review and respond to emails regarding UST interview and other case issues (.5).
10/22/24	S. Maizel	1.50	1,687.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues (.4); multiple telephone conferences with T. Moyron re pending issues (0.9); review and respond to emails re pending issues (.2).
10/22/24	S. Maizel	0.50	562.50	B110	Zoom conference with Dentons public relations team re communication strategy.
10/22/24	T. Moyron	0.20	197.10	B110	Attention to motion to extend time to file schedules and SOFA.
10/23/24	G. Medina	1.60	669.60	B110	Correspond with C. Doherty regarding request from the court (0.1); call the court with T. Moyron regarding creditor matrix upload (0.2); receive, edit upload creditor matrix (0.3); draft amended creditor matrix and send to C. Doherty for review (0.4); send creditor matrix to C. Aguilar for conflicts check (0.2); send notice of filing amended creditor matrix to T. Moyron for review and file amended creditor matrix (0.4).
10/23/24	K.M. Howard	0.10	39.15	B110	Email exchanges with S. Maizel regarding a UCC search on GWC.

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2802660

November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	K.M. Howard	0.10	39.15	B110	Email exchanges with S. Maizel regarding addresses on the master mailing matrix.
10/23/24	K.M. Howard	0.20	78.30	B110	Review Notice of Amended Mailing Matrix (.1); prepare email to G. Medina regarding the correct case caption (.1).
10/23/24	C. Doherty, Jr.	0.70	620.55	B110	Review and respond to emails, including from court, concerning case matters (.3); prepare amended creditor matrix and supervise filing of same (.2); prepare for first day hearing (.2).
10/23/24	T. Moyron	0.90	886.95	B110	Zoom conference with R. Centrulo, K. Manning, Ankura, HLB, etc. re pending issues (.4); multiple calls with S. Maizel re pending issues (.5).
10/23/24	T. Moyron	0.30	295.65	B110	Call with M. Cyganowski and S. Maizel re background and potential PCO role.
10/23/24	T. Moyron	0.30	295.65	B110	Analyze emails from J. Morrow, et al., regarding matrix.
10/23/24	T. Moyron	0.30	295.65	B110	Correspond with G. Medina re uploading of matrix (.1); call with Clerk's office regarding same (.1); prepare email to C. Doherty, et al, re same (.1).
10/23/24	T. Moyron	0.50	492.75	B110	Call with D. Doherty regarding case filings, pending issues and next steps.
10/23/24	T. Moyron	0.30	295.65	B110	Attention to updated OCP motion and redline.
10/23/24	T. Moyron	0.10	98.55	B110	Attention to MSA language and granting of security interest.
10/23/24	T. Moyron	0.20	197.10	B110	Analyze Wells letter (.1); prepare email to R. Cetrulo re Wells letter (.1).
10/23/24	T. Moyron	0.10	98.55	B110	Correspond with G. Miller re motion to extend time to file Schedules/SOFA.
10/23/24	G. Miller	0.70	623.70	B110	Prepare motion for extension of time to file schedules and statements.
10/23/24	S. Maizel	0.90	1,012.50	B110	Zoom conference with R. Centrulo, K. Manning, Ankura, HLB, etc. re pending issues (.4); multiple telephone conferences with T. Moyron re pending issues (.5).
10/23/24	S. Maizel	0.30	337.50	B110	Telephone conference with M. Cyganowski re potential PCO role (.3).

Global Wound Care Medical Group, A Professional Corporation
Matter: 15816151-000002
Invoice No.: 2802660

November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	S. Maizel	0.70	787.50	B110	Review mailing matrix (.3); emails to J. Morrow, Verita Global, re matrix revisions (.4) .
10/23/24	S. Maizel	0.10	112.50	B110	Review and respond to emails re UCC search.
10/23/24	J. Margolies	1.60	633.60	B110	Revise draft of motion to extend time to file schedules and statement of financial affairs and email T. Moyron and case team regarding same.
10/23/24	D. Thomas-Nichols	0.20	84.60	B110	Pull requested financial advisors applications (.1); correspond with S. Ruben regarding same (.1).
10/24/24	S. Maizel	0.90	1,012.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues (.4); multiple t/c with T. Moyron re pending issues, first day hearing, etc. (.5).
10/24/24	S. Maizel	0.80	900.00	B110	Participate in first day hearing by Zoom.
10/24/24	S. Alberts	0.30	332.10	B110	Communicate with S. Maizel about first day hearing and next steps.
10/24/24	T. Moyron	0.40	394.20	B110	Daily huddle Zoom meeting with R. Cetrulo, I. Lee, et al., regarding pending issues.
10/24/24	T. Moyron	2.00	1,971.00	B110	Calls and correspondence with S. Maizel prior to hearing (.6); analyze response to First Day Declaration filed by A. Curtis (.2); analyze first-day motions (.3); attend Court hearing on first-day motions (.8); call with R. Cetrulo regarding first-day hearing (.1).
10/24/24	T. Moyron	0.40	394.20	B110	Analyze orders on emergency first-day motions, KCC applications, etc. (.2); correspondence regarding same with C. Doherty, et al. (.2).
10/24/24	T. Moyron	0.40	394.20	B110	Correspond with K. Manning, et al., regarding list of employees re biologic fees (.2); call with I. Lee re same (.1); prepare email to A. Warner re list (.1).
10/24/24	G. Miller	0.60	534.60	B110	Draft update to proposed order approving wage motion.
10/24/24	G. Miller	0.50	445.50	B110	Call with DOJ, S. Maizel and T. Moyron re first day hearing.
10/24/24	G. Miller	0.80	712.80	B110	Attend first day hearing.

Global Wound Care Medical Group, A Professional Corporation
 Matter: 15816151-000002
 Invoice No.: 2802660

November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/24	S. Maizel	0.60	675.00	B110	Zoom conference with Dr. Relaford, R. Cetrulo, etc. re first day hearing and communications with DOJ.
10/24/24	C. Doherty, Jr.	1.70	1,507.05	B110	Prepare for and attend first day hearing (1.0); review and respond to emails regarding first day hearing and procedure and other case matters (.3); prepare notice of redline for Wage Motion and discuss same with T. Moyron (.3); prepare letter to Wells Fargo regarding cash management order (.1).
10/24/24	T. Moyron	0.80	788.40	B110	Zoom with Dr. Ellington and calls with S. Maizel re pending matters.
10/25/24	T. Moyron	0.70	689.85	B110	Meeting with KCC, S. Maizel, et al., regarding Schedules/SOFA, etc., and analyze related matters.
10/25/24	T. Moyron	0.80	788.40	B110	Zoom meeting with Ankura regarding reporting and coordination and analyze related matters.
10/25/24	G. Medina	0.50	209.25	B110	Correspond with G. Miller regarding filings (0.1); review and file motion to extend time to file schedules and statements (0.2); review and file notice of hearing (0.2).
10/25/24	N. Hare	1.00	1,125.00	B110	Conference call with T. Moyron, S. Maizel, etc. re communication strategy.
10/25/24	N. Hare	0.80	900.00	B110	Participate in conference call with R. Cetrulo, etc. re communication strategy.
10/25/24	C. Doherty, Jr.	2.00	1,773.00	B110	Review and respond to emails and communications concerning procedural motions and local procedures concerning same and draft analysis concerning local procedures and precedent regarding motions and hearing dates (1.3); conduct research regarding question regarding section 329 and non debtors and prepare analysis of same (.5); prepare for and attend call with Ankura team and Dentons regarding schedules and SOFAs (.2).

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10/25/24	K.M. Howard	0.30	117.45	B110	Review newly received documents from R. Cetrulo regarding Wells Fargo and bank statements (.1); import documents into document management database (.1); prepare email to T. Moyron regarding the Wells Fargo letter (.1).
10/25/24	G. Miller	0.90	801.90	B110	Prepare motion to extend time to file schedules and statements.
10/25/24	G. Miller	0.40	356.40	B110	Call with Verita, Dentons and Ankura re preparation of schedules and statements.
10/25/24	G. Miller	0.60	534.60	B110	Draft motion authorizing employment of ordinary course professionals (.4); Call with C. Doherty re same (.2).
10/25/24	S. Maizel	1.30	1,462.50	B110	Zoom with Venta, etc. re preparation of SOFA/Schedules (.4); zoom conference with Ankura, etc. re same (.6); review and respond to emails re same (.3).
10/25/24	S. Maizel	0.30	337.50	B110	Zoom with R. Cetrulo, K. Manning, Ankura, etc. re pending issues (.2); telephone conference with T. Moyron re same (.1).
10/25/24	S. Maizel	1.40	1,575.00	B110	Review and respond to emails re OCP Motion (.4); research re payment by third parties of OCPs (1.0).
10/25/24	S. Maizel	0.70	787.50	B110	Review and respond to emails from Texas Medical Board re bankruptcy filing.
10/25/24	T. Moyron	1.10	1,084.05	B110	Attention to OCP motion and payments related thereto.
10/25/24	T. Moyron	1.20	1,182.60	B110	Zoom meeting with K. Manning, et al., re pending issues (.2); follow up Zoom meeting with K. Manning, et al., regarding call with DOJ counsel (.5); zoom with HLB regarding DOJ meeting (.5).
10/26/24	G. Miller	2.60	2,316.60	B110	Draft motion to employ ordinary course professionals.
10/26/24	C. Doherty, Jr.	0.20	177.30	B110	Prepare analysis regarding section 329 precedent.
10/28/24	T. Moyron	0.80	788.40	B110	Zoom meeting with R. Cetrulo, K. Manning, et al., regarding pending issues, including proposed language to wage order, DOJ, IDI, and Schedules and SOFA.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/24	T. Moyron	0.30	295.65	B110	Correspond with bankruptcy analyst at United States Trustee's Office re IDI (.1) and correspond with R. Cetrulo, I. Lee, regarding same (.2).
10/28/24	T. Moyron	1.80	1,773.90	B110	Analyze matters related to venue.
10/28/24	T. Labuda	0.20	286.20	B110	Conference and emails with Moyron re venue issues and analysis.
10/28/24	C. Doherty, Jr.	3.20	2,836.80	B110	Calls with T. Moyron regarding questions from UST, including venue (.4); perform research and prepare analysis concerning venue of case for presentation to UST (2.3); review and respond to emails regarding case matters and local practices (.3); prepare notice of redline order regarding wage motion (.1); call with J. Moe regarding local precedent for fee applications (.1).
10/28/24	G. Miller	0.40	356.40	B110	Emails with R. Cetrulo and K. Greer re motion to employ ordinary course professionals.
10/28/24	K.M. Howard	1.40	548.10	B110	Review statutory requirements regarding key bankruptcy deadlines (.6); determine statutory deadlines (.4); review and revise Critical Dates Memorandum accordingly (.4).
10/28/24	K.M. Howard	0.30	117.45	B110	Review Motion to Extend Time to file Schedules (.2); review and revise Critical Dates Memorandum accordingly (.1).
10/28/24	K.M. Howard	0.40	156.60	B110	Analysis of the court's order granting Debtor's Motion for an Extension to file Schedules and Statement of Financial Affairs (.2); review and revise Critical Dates Memorandum (.2).
10/28/24	K.M. Howard	0.40	156.60	B110	Research UST Guidelines concerning payment of quarterly fees in Southern District of Texas.
10/28/24	K.M. Howard	0.40	156.60	B110	Analysis of order granting complex case treatment (.2); review and revise Critical Case Memorandum accordingly (.2).

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10/28/24	S. Maizel	1.00	1,125.00	B110	Zoom conference with R. Centrulo, K. Manning, Ankura, T. Moyron, etc. re pending issues (.8); review and respond to emails re same (.2).
10/28/24	S. Maizel	1.00	1,125.00	B110	Telephone conference with T. Moyron re US Trustee and venue issues (.2); review and respond to emails re venue issues raised by US Trustee (.2); review precedent on venue in SD Texas (0.6).
10/28/24	S. Maizel	0.50	562.50	B110	Telephone conference with K. Greer re entries on internet re filing (.1); review and respond to emails re same (.4) .
10/28/24	S. Maizel	0.30	337.50	B110	Review and respond to emails from DOJ re Wage Motion Order revisions.
10/29/24	S. Maizel	0.10	112.50	B110	Review and respond to emails re IDI.
10/29/24	S. Maizel	0.70	787.50	B110	Zoom conference with R. Cetrulo, K. Manning, K. Greer, Ankura, etc. re pending issues, including meeting with DOJ.
10/29/24	S. Maizel	1.00	1,125.00	B110	Multiple telephone conference with T. Moyron re US Trustee venue questions (.4); review and respond to emails re same (.6).
10/29/24	S. Maizel	0.10	112.50	B110	Telephone conference with G. Miller re service issues.
10/29/24	S. Maizel	0.30	337.50	B110	Review and respond to emails re appointment of possible PCO.
10/29/24	N. Hare	0.50	562.50	B110	Participate in conference call with client re communication strategy.
10/29/24	N. Hare	0.50	562.50	B110	Review materials from client re communications strategy.
10/29/24	C. Doherty, Jr.	3.50	3,102.75	B110	Prepare analysis concerning venue questions raised by UST in preparation for call with UST (3.0); call with T. Moyron regarding venue and case issues (.2); review and respond to emails regarding case matters (.3).
10/29/24	T. Moyron	1.10	1,084.05	B110	Zoom with K. Manning, R. Cetrulo, et al., regarding 7-day package, DOJ, UST inquiry, and other matters (.7); follow up call with S. Maizel re same (.3); exchange emails with K. Greer re UST inquiry (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/29/24	T. Moyron	3.70	3,646.35	B110	Analyze cases and provide comments to memo regarding venue (2.8); correspondence and calls with C. Doherty (.5); correspondence and call with K. Greer re same (.2); and correspondence and call with R. Cetrulo re same (.2).
10/29/24	T. Moyron	0.20	197.10	B110	Correspond with C. Doherty, et al., regarding Wells Fargo and lift of debit block.
10/29/24	T. Labuda	1.20	1,717.20	B110	Review venue research materials and cases (.7); emails with Moyron and Doherty re venues issues (.2); review and comment on UST correspondence (.2); emails with Dentons team re outreach to UST (.1).
10/30/24	C. Doherty, Jr.	1.10	975.15	B110	Prepare for and attend call with UST regarding venue and Patient Care Ombudsmen (.7); review and respond to emails regarding case matters and first day orders (.3); review pro hac orders entered by court (.1).
10/30/24	T. Moyron	0.50	492.75	B110	Zoom meeting with R. Cetrulo, K. Manning, K. Greer, et al., regarding pending issues and next steps re daily huddle.
10/30/24	T. Moyron	0.60	591.30	B110	Call with UST, S. Maizel and C. Doherty regarding venue (.4); call with S. Maizel thereafter regarding same (.2).
10/30/24	T. Moyron	1.30	1,281.15	B110	Analyze matters related to additional facts and background regarding inquiry from UST.
10/30/24	T. Moyron	0.20	197.10	B110	Correspond with R. Cetrulo, et al., re profit and loss statement.
10/30/24	S. Ruben	0.10	75.15	B110	Correspond with T. Moyron, C. Doherty, and G. Medina re forthcoming case deadlines.
10/30/24	S. Maizel	0.80	900.00	B110	Zoom conference with R. Centrulo, K. Manning, Ankura, etc. re pending issues (.5); review and respond to emails re same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/24	S. Maizel	1.20	1,350.00	B110	Review and revise notes re venue issues for US Trustee (.6); zoom conference with Office of the US Trustee re venue issues (.4); telephone conference with T. Moyron re venue issues (.2).
10/30/24	S. Maizel	0.30	337.50	B110	Review and respond to emails re service on HHS and US DOJ from P. Leathem, Verita.
10/30/24	G. Medina	0.40	167.40	B110	Correspond with docketing regarding case calendar and send additional dates to calendar.
10/30/24	K.M. Howard	0.10	39.15	B110	Review email chains regarding ECF notifications.
10/30/24	K.M. Howard	0.20	78.30	B110	Review order granting pro hac vice applications of S. Maizel and T. Moyron (.1); prepare email to S. Maizel and T. Moyron regarding same (.1).
10/31/24	S. Maizel	1.50	1,687.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, T. Moyron, etc. re pending issues (1.0); multiple t/c with T. Moyron re same (.5).
10/31/24	S. Maizel	0.60	675.00	B110	Zoom conference with Ankura, T. Moyron re initial submission to the US Trustee.
10/31/24	D. Thomas-Nichols	0.10	42.30	B110	Update workflow stream memo.
10/31/24	T. Moyron	1.20	1,182.60	B110	Analyze IDI package and provide comments thereto (1.1); correspond with T. Tran, et al., regarding same (.1).
10/31/24	C. Doherty, Jr.	0.30	265.95	B110	Review and respond to emails regarding case, including with court concerning wage order (.2); call with T. Moyron regarding wage order (.1).
	Subtotal	91.90	85,859.10		

B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	G. Miller	0.20	178.20	B120	Calls and emails with S. Maizel and K. Howard re UCC search.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	K.M. Howard	0.90	352.35	B120	Email exchange with S. Maizel regarding running UCC searches in states where debtor is licensed to do business (.1); telephone conference with G. Liwanag of CT Corp. regarding UCC searches in states where debtor is licensed (.1); email exchanges with G. Liwanag regarding same (.1); telephone conference with A. Howard of CT Corp. regarding same (.1); review email from G. Liwanag including the attached UCC search report (.4); prepare email to S. Maizel, T. Moyron and G. Miller regarding the results (.1).
10/29/24	K.M. Howard	0.80	313.20	B120	Email exchange with G. Liwanag regarding the UCC report from Georgia (.1); review the UCC report obtained from Georgia (.1); prepare email to G. Miller regarding same (1); review email from G. Miller regarding new UCC search (.1); prepare email to G. Liwanag regarding same (.1); followup telephone conference with CT Corp. regarding same (.1); email exchanges with G. Liwanag regarding same (.1); email exchanges with S. Maizel regarding same (.1).
10/29/24	S. Maizel	0.10	112.50	B120	Review and respond to emails re UCC searches.
10/29/24	G. Miller	0.40	356.40	B120	Review UCC search results and email K. Howard re same.
10/31/24	S. Maizel	0.50	562.50	B120	Review and respond to emails re UCC search results.
10/31/24	G. Miller	0.10	89.10	B120	Review UCC search results.
10/31/24	K.M. Howard	0.40	156.60	B120	Review email from CT Corp regarding the requested UCC searches (.1); review attached report of the UCC searches by state (.1); prepare email to CT Corp regarding same (.1); prepare email to G. Miller and S. Maizel regarding the UCC searches (.1).
	Subtotal	3.40	2,120.85		

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B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	S. Maizel	0.40	450.00	B150	Telephone conference with D. Lemke, counsel for 180 Health Services, re pending issues.
	Subtotal	0.40	450.00		

B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	J.A. Moe, II	0.20	180.90	B160	In regard to Denton's Application To Employ Dentons US LLP As Bankruptcy Counsel, telephone call from Tania Moyron on preparing Dentons' Application, and telephone call returned from Casey Daugherty on preparing the Application.
10/22/24	J.A. Moe, II	0.20	180.90	B160	In regard to the Application To Employ Dentons US LLP As Bankruptcy Counsel, review samples in regard to formatting and contents of Applications For Employment in the United States Bankruptcy Court in the Southern District of Texas.
10/22/24	J.A. Moe, II	1.30	1,175.85	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, prepare first draft of the Debtor's Application For Employment Of Dentons US LLP, review the draft of the Declaration Of Sam Maizel in support of the Application and review the draft of the Order approving the Application.
10/22/24	J.A. Moe, II	0.80	723.60	B160	In regard to the Debtor's Application For Employment Of Dentons US LLP As Bankruptcy Counsel, review additional sets of information to be included in the Declaration Of Sam Maizel (.40); prepare first draft of the Declaration Of Sam Maizel in support of the Application (.40).

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10/22/24	J.A. Moe, II	0.90	814.05	B160	In regard to the Application To Employ Dentons US LLP As Bankruptcy Counsel, preliminarily review the First Day Declaration Of Ralph Cetrulo in connection with formulating a Declaration specifically in support of the Debtor's Application (.20); prepare draft of the Declaration Of R. Cetrulo in support of the Debtor's Application (.70).
10/22/24	J.A. Moe, II	0.40	361.80	B160	In regard to the Debtor's Application For Employment Of Dentons US LLP As Bankruptcy Counsel, exchange E-Mails with Sam Maizel and review Dentons' Statement for pre-petition services (.20); conferences with Kathryn Howard on Dentons' retention and payment for services (.20).
10/22/24	J.A. Moe, II	0.20	180.90	B160	In regard to the Order to be entered approving the Debtor's Application For Employment Of Dentons US LLP As Bankruptcy Counsel, prepare first draft of the Order approving the Application.
10/22/24	T. Moyron	0.40	394.20	B160	Attention to Dentons employment application.
10/22/24	T. Moyron	0.20	197.10	B160	Correspond with S. Ruben re Ankura employment application.
10/22/24	K.M. Howard	0.20	78.30	B160	Telephone conference with J. Moe regarding the firm's retainer and drawn down amounts in conjunction with preparation of the employment application (.1); email exchanges regarding same (.1).
10/22/24	K.M. Howard	0.60	234.90	B160	Telephone conference with J. Moe regarding declaration in support of Dentons' employment application (.1); research and assemble requested information (.1); prepare email to J. Moe regarding same (.1); followup call from J. Moe regarding additional information needed to preparation employment application (.1); research and assemble requested information (.1); prepare email to J. Moe regarding the results (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	K.M. Howard	0.20	78.30	B160	Assemble first day declaration (.1); prepare email to J. Moe in conjunction with using information in the declaration to prepare Dentons' employment application (.1).
10/22/24	K.M. Howard	0.30	117.45	B160	Telephone conference with J. Moe regarding amount paid by debtor to Dentons (.1); compile information regarding amount paid by the debtor requested by J. Moe (.1); prepare email to J. Moe regarding same (.1).
10/22/24	G. Miller	2.30	2,049.30	B160	Draft motion to approve interim compensation procedures.
10/22/24	D. Cook	0.80	684.00	B160	Prepare application to retain Dentons (.7); telephone conference with J. Moe concerning same (.1).
10/23/24	G. Miller	1.90	1,692.90	B160	Prepare application to retain Ankura.
10/23/24	G. Miller	2.40	2,138.40	B160	Draft motion to approve interim compensation procedures.
10/23/24	G. Miller	4.40	3,920.40	B160	Draft motion to approve procedures to retain ordinary course professionals.
10/23/24	T. Moyron	0.60	591.30	B160	Analyze and prepare comment to Knudsen motion re interim procedures.
10/23/24	T. Moyron	0.30	295.65	B160	Correspond regarding employment applications with S. Ruben, et al.
10/23/24	T. Moyron	0.20	197.10	B160	Correspond with G. Miller, et al., regarding Ankura employment application.
10/23/24	S. Maizel	0.70	787.50	B160	Review and respond to emails re employment applications (.3); review and revise motion re interim compensation procedures (.4).
10/23/24	S. Ruben	1.60	1,202.40	B160	Correspond with I. Lee re Ankura retention application (.1); revise the same (1.4); review proposed changes to Ankura retention application (.1).
10/23/24	J.A. Moe, II	0.80	723.60	B160	In regard to the Debtor's Application To Employ Dentons US LLP as Bankruptcy Counsel, revise the first draft of the Declaration Of Ralph Cetrulo in support of the Application (.40); make revisions to the Declaration Of Ralph Cetrulo (.30); reformat the Mr. Cetrulo's Declaration (.10).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	J.A. Moe, II	1.30	1,175.85	B160	In regard to the Debtor's Application To Employ Dentons US LLP as Bankruptcy Counsel, revise and expand the first draft of the Declaration Of Samuel R. Maizel in support of the Application (.90); revise Sam Maizel's Declaration to include specific information consistent with information in Applications and Declarations on employment filed in Texas (.40).
10/23/24	J.A. Moe, II	1.40	1,266.30	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, revise the first draft of the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel (.80); revise the second draft of the Application to include specific information consistent with information in Applications filed in Texas (.40) and insure last two iterations of the Application are included in the current version of the Application (.20).
10/23/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, revise the first draft of the Order approving Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel.
10/23/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, continue to review the procedures and requirements to file an Application For Employment Of Counsel in Texas.
10/23/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, prepare E-Mail to Tania Moyron and Sam Maizel outlining the information required to complete the Application.
10/23/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review exchanges of information and assess status of review of parties for conflicts (.10); commence preparation of the list of parties checked for conflicts (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	J.A. Moe, II	0.10	90.45	B160	Review of the U.S. Trustee Guidelines For Reviewing Applications For Compensation And Reimbursement Of Expenses Filed Under 11 U.S.C. Section 330 By Attorneys In Larger Chapter 11 Cases.
10/23/24	K.M. Howard	0.70	274.05	B160	Review email from J. Moe regarding Southern District of Texas requirements and guidelines regarding employment applications (.1); research Texas Local Rules and other related requirements including UST Guidelines (.4); compile Local Rules and UST Guidelines (.1); prepare email to J. Moe regarding same including requirement of Local Rule 2014-1 (.1).
10/24/24	K.M. Howard	0.50	195.75	B160	Email exchanges with J. Moe regarding additional material needed for preparation of Dentons' employment application (.1); review/assemble requested information (.3); prepare email to J. Moe regarding same (.1).
10/24/24	S. Ruben	0.10	75.15	B160	Correspond with I. Lee and A. Wagner re draft Ankura retention application.
10/24/24	J.A. Moe, II	0.20	180.90	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, continue to review, revise and complete preparation of list of parties checked for conflicts.
10/24/24	J.A. Moe, II	1.80	1,628.10	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, revise the first draft of the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel (.80); revise the Application to include specific information consistent with information in Applications filed in Texas (.40); further revisions to the Application (.20); further revisions to the Application (.20); further minor revisions to the Declaration, including revisions in compliance with Local Rule and U.S. Trustee Guidelines (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/24	J.A. Moe, II	0.60	542.70	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, revise the third draft of the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel.
10/24/24	J.A. Moe, II	0.90	814.05	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review the latest version of the Declaration Of Samuel R. Maizel in support of the Application (.60); revise the Declaration (.30).
10/24/24	J.A. Moe, II	0.30	271.35	B160	In regard the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review the revised and reformatted Declaration Of Ralph Cetrulo in support of the Application (.20); one minor revision to the Declaration in compliance with Local Rule (.10).
10/24/24	J.A. Moe, II	0.20	180.90	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review the revised Order approving Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, make minor revisions and review completed Order.
10/24/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application to Employ Dentons US LLP As Bankruptcy Counsel, review Engagement Letter and October 21st Statement, and two brief conferences with Kathryn Howard, on rates to be reflected in the Application For Employment.
10/24/24	J.A. Moe, II	0.40	361.80	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, continue to review the U.S. Trustee Guidelines For Reviewing Applications For Compensation And Reimbursement Of Expenses Filed Under 11 U.S.C. Section 330 By Attorneys In Larger Chapter 11 Cases, and review the two sets of UST Comments on then proposed Guidelines, and review the Local Rules for the Southern District Of Texas.

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10/24/24	J.A. Moe, II	0.40	361.80	B160	In regard the Debtor's Application To Employ Dentons US LLP as Bankruptcy Counsel, review drafts of completed documents and assemble Exhibits; then forward Application, Declarations and Order to Tania Moyron.
10/24/24	G. Miller	0.50	445.50	B160	Draft Ankura retention application.
10/25/24	T. Moyron	4.10	4,040.55	B160	Analyze, prepare comment to and finalize Dentons' employment application and declaration and analyze exhibits (2.6); correspond with J. Moe, et al., regarding same, additions and modifications and noticing matters (1.1); analyze compensation form (.1); correspond with S. Maizel et al. re retainer (.3).
10/25/24	T. Moyron	1.20	1,182.60	B160	Analyze motion to establish procedures and order and comment thereon.
10/25/24	T. Moyron	1.20	1,182.60	B160	Analyze and comment on Ankura employment application (.8); correspondence and call with G. Miller regarding same (.2); correspond with I. Lee re timing (.2).
10/25/24	S. Maizel	0.40	450.00	B160	Review and respond to emails re final resolution of prepetition invoices.
10/25/24	D. Thomas-Nichols	1.20	507.60	B160	Correspond with T. Moyron regarding preparation and revision to parties in interest for retention application (.2); prepare parties in interest exhibit (1.0).
10/25/24	K.M. Howard	0.80	313.20	B160	Numerous telephone conferences and emails with J. Moe regarding Dentons' employment application (.3); prepare email to J. Moe regarding the Disclosure of Compensation as an exhibit to the employment application (.1); research Southern District of Texas requirements regarding filing the Disclosure of Compensation as an exhibit to the employment application (.3); telephone conference with J. Moe regarding same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	K.M. Howard	0.40	156.60	B160	Revise Disclosure of Compensation of Attorney (.2); prepare email to S. Maizel and T. Moyron regarding same (.1); email exchanges with T. Moyron regarding same (.1).
10/25/24	G. Miller	0.20	178.20	B160	Call with J. Moe re Dentons retention application.
10/25/24	G. Miller	0.50	445.50	B160	Prepare Ankura retention application (.3); calls and emails with S. Ruben and I. Lee re same (.2).
10/25/24	G. Miller	0.30	267.30	B160	Call with T. Moyron re Dentons retention application.
10/25/24	G. Miller	0.80	712.80	B160	Draft disclosure schedule re Dentons' retention application.
10/25/24	S. Ruben	1.60	1,202.40	B160	Correspond with T. Moyron and G. Miller re draft Ankura retention application (.1); review changes to the same (.2); conference with G. Miller re changes to retention application (.2); revise Ankura retention application (1.1).
10/25/24	J.A. Moe, II	0.30	271.35	B160	In regard to the Debtor's Application to Employ Dentons US LLP As Bankruptcy Counsel, telephone calls with Kathryn Howard on amount of the retention and amount paid to Dentons pre-petition, and also on the revised Statement On Compensation, in regard to completing the Debtor's Application For Employment Of Dentons US LLP.
10/25/24	J.A. Moe, II	2.40	2,170.80	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, proofread and make minor revisions to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel (.30); review and make two revisions to the Application (.30), then substantially revise the Application to include new and updated information on the Firm, an alternative description of Dentons as a Firm, the description of accounting for some services and meeting the requirements of Bankruptcy Code section 2014. (1.80).

Global Wound Care Medical Group, A Professional Corporation
 Matter: 15816151-000002
 Invoice No.: 2802660

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	J.A. Moe, II	0.40	361.80	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, proofread and make minor revisions to the Declaration Of Samuel R. Maizel in support of the Application (.30); review the revised Declaration of Mr. Maizel (.10).
10/25/24	J.A. Moe, II	0.20	180.90	B160	In regard the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, proofread and make minor set of revisions to the Declaration Of Ralph Cetrulo in support of the Application.
10/25/24	J.A. Moe, II	0.10	90.45	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review the Order approving the Application.
10/25/24	J.A. Moe, II	0.20	180.90	B160	In regard the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review the status of clearing conflicts, and review document reporting on conflicts checked.
10/25/24	J.A. Moe, II	1.60	1,447.20	B160	In regard to the Debtor's Application to Employ Dentons US LLP As Bankruptcy Counsel, exchange E-Mails with Tania Moyron and Geoffrey Miller on completing the Application For Employment (.10); prepare the completed Debtor's Application For Employment Of Dentons US LLP As Bankruptcy Counsel with seven Exhibits, including completing preparation of the Exhibits, preparatory to filing (.90). exchange multiple E-Mails with and telephone call from Tania Moyron on continuing work on the Application and approval of the Application subject to two minor revisions (.30); revise the Application (.20); telephone call with George Medina on preparing and filing the Application (.10).
10/25/24	J.A. Moe, II	0.20	180.90	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review Sam Maizel's E-Mail and telephone calls with Kathryn Howard on amount paid pre-petition to include in the Debtor's Application To Employ Dentons US LLP.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	J.A. Moe, II	1.60	1,447.20	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review, edit and conform to each other the Application To Employ Dentons US LLP As Bankruptcy Counsel to the Declaration Of Samuel R. Maizel.
10/25/24	G. Medina	1.40	585.90	B160	Correspond with G. Miller regarding exhibit D to employment application (0.1); received and prepare for filing dentons retention application and send to T. Moyron, S. Maizel, J. Moe, G. Miller, C. Doherty and K. Howard for review (0.4); call with J. Moe regarding disclosure of compensation (0.1); file Dentons employment application (0.5); review and file interim compensation motion (0.3).
10/28/24	G. Miller	0.20	178.20	B160	Prepare Ankura retention application.
10/28/24	S. Ruben	1.20	901.80	B160	Correspond with T. Moyron and G. Miller re draft Ankura retention application (.1); revise Ankura retention application (1); discuss Ankura parties in interest list with D. Nichols (.1).
10/28/24	J.A. Moe, II	0.30	271.35	B160	Review the Debtor's Motion For Entry Of An Order Establishing Procedures For Interim Compensation And Reimbursement Of Expenses For Retained Professionals (.20); telephone call to Casey Doherty on form of Monthly Fee Application in the Southern District Of Texas (.10).
10/28/24	D. Thomas-Nichols	0.70	296.10	B160	Compare parties in interest in Ankura retention application to Dentons list of parties in interest (.6); correspond with S. Ruben regarding differences (.1).
10/29/24	J.A. Moe, II	0.40	361.80	B160	In regard to the Debtor's Application To Employ Dentons US LLP As Bankruptcy Counsel, review E-Mail from Samantha Ruben on list of parties checked for conflicts, then confer with Alicia Aguilar on parties reviewed for conflicts (.10); exchange E-Mails with Sam Maizel and Tania Moyron on parties reviewed for conflicts (.10); review additional exchanges of E-Mails, including Geoffrey Miller's E-Mail, on review for additional parties for conflicts (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/29/24	S. Ruben	1.10	826.65	B160	Revise Ankura retention application (.8); discuss parties in interest list with G. Miller (.1); conference with J. Moe re parties in interest list (.1); correspond with A. Wagner re parties in interest list (.1).
10/29/24	G. Miller	0.60	534.60	B160	Prepare Ankura retention application.
10/30/24	S. Ruben	0.30	225.45	B160	Revise Ankura retention application.
10/30/24	J.A. Moe, II	1.20	1,085.40	B160	In regard to the Debtor's Application To Employ Dentons US LLP as Bankruptcy Counsel, extended telephone call with K. Howard on current status of the case and review of the Knudsen Motion.
10/31/24	G. Miller	0.10	89.10	B160	Further prepare motion to employ ordinary course professionals.
	Subtotal	60.00	50,549.40		

B190 - Other Contested Matters (excluding Assumption/Rejection Moti

Date	Timekeeper	Hours	Amount	Task	Narrative
10/22/24	K.M. Howard	0.40	156.60	B190	Review email from T. Moyron regarding first day hearing (.1); prepare email to T. Moyron and S. Maizel regarding same (.1); email exchanges with T. Moyron regarding first day hearing (.1); review Notice of First Day Hearing (.1).
	Subtotal	0.40	156.60		

B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/24	T. Moyron	0.30	295.65	B210	Analyze letter from Wells re account (.1); correspond with C. Doherty regarding same (.1); prepare email to R. Cetrulo regarding same (.1).
10/28/24	T. Moyron	0.50	492.75	B210	Zoom with R. Cetrulo, I. Lee, et al., re Projections.
	Subtotal	0.80	788.40		

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B220 - Employee Benefits/Pension

Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/24	T. Moyron	0.80	788.40	B220	Analyze wage order and proposed redline (.2); correspond with G. Miller re filing of amended order (.2); analyze notice of revised order and prepare comment thereto (.2); analyze redline and updated notice4 (.1); and correspond with G. Medina regarding filing (.1).
10/31/24	T. Moyron	0.10	98.55	B220	Call with C. Doherty regarding wage order and related matters.
	Subtotal	0.90	886.95		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	G. Miller	0.30	267.30	B310	Review MSA re Wound Pros possible secured claim and email T. Moyron and S. Maizel re same.
	Subtotal	0.30	267.30		

B410 - General Bankruptcy Advice/Opinions

Date	Timekeeper	Hours	Amount	Task	Narrative
10/29/24	R. Garms	0.40	275.40	B410	Review organizational and corporate questions and respond to same.
	Subtotal	0.40	275.40		

EMP - Employment

Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/24	S. Ruben	1.60	1,202.40	EMP	Revise wage motion (1.4); emails with T. Moyron and G. Miller re revisions to wage motion (.2).
10/24/24	S. Ruben	0.10	75.15	EMP	Correspond with T. Moyron and G. Miller re wage order.
10/25/24	S. Maizel	0.60	675.00	EMP	Review and respond to emails re DOJ comments on Wage Motion Order.

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November 25, 2024

Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	S. Ruben	0.20	150.30	EMP	Correspond with T. Moyron and G. Miller re wage order (.1); review proposed changes to wage order (.1).
10/25/24	T. Moyron	0.30	295.65	EMP	Analyze email from A. Warner re wage motion (.1); analyze emails from S. Maizel re same (.1); and analyze email from K. Greer re same (.1).
10/26/24	S. Maizel	0.30	337.50	EMP	Review and respond to emails from DOJ re Wage Motion Order revisions.
10/28/24	G. Miller	0.40	356.40	EMP	Prepare notice of filing revised wage order.
	Subtotal	3.50	3,092.40		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/24	S. Maizel	3.00	3,375.00	MED/CMS	Review and revise complaint re CMS suspension; review and revise emergency motion re CMS suspension.
10/21/24	T. Moyron	0.30	295.65	MED/CMS	Analyze letter to HHS, CMS and Qlarant and provide comment thereto to S. Maizel.
10/22/24	S. Schrag	0.10	96.30	MED/CMS	Review correspondence regarding stay motion.
10/22/24	D. Cook	4.80	4,104.00	MED/CMS	Prepare complaint to enjoin CMS from suspending payments to debtor (3.2); prepare motion to enforce automatic stay in connection with same (1.6).
10/22/24	T. Moyron	1.90	1,872.45	MED/CMS	Attention to CMS emergency motion (.5); analyze and prepare comment to letter to HHS, et al. (.9); correspond with S. Maizel re same (.5).
10/22/24	S. Maizel	1.20	1,350.00	MED/CMS	Review and respond to emails re CMS issues (.6); revise letter to HHS, CMS, USAO and Qlarant re suspension and automatic stay (.6).
10/22/24	S. Maizel	1.00	1,125.00	MED/CMS	Research re burden of proof on exception to automatic stay re emergency motion re CMS suspension.
10/22/24	S. Maizel	0.50	562.50	MED/CMS	Revising emergency motion re CMS suspension.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/24	N. Hare	1.00	1,125.00	MED/CMS	Research re CMS issues.
10/23/24	T. Moyron	0.20	197.10	MED/CMS	Attention to emergency motion.
10/23/24	D. Cook	4.20	3,591.00	MED/CMS	Prepare motion to enforce automatic stay and enjoin CMS from suspending payments to debtor (4.1); email correspondence with S. Maizel and T. Moyron concerning same (.1).
10/23/24	S. Schrag	0.20	192.60	MED/CMS	Review memo regarding timeline and stay motion.
10/23/24	S. Maizel	0.80	900.00	MED/CMS	Review and revise emergency motion re CMS suspension.
10/24/24	S. Maizel	3.50	3,937.50	MED/CMS	Zoom conference with A. Curtis, US DOJ, etc. re CMS suspension (.5); Zoom conference with HLB attorneys, etc. re same (.5); Zoom conference with A. Curtis, US DOJ, etc. after hearing re Medicare suspension (.5); Zoom conference with C. Oppenheim, C. Wicker, and D. Schumacher, HLB attorneys, etc. re DOJ response to first day declaration issues (.5); drafting email to DOJ in response to issues raised in Zoom conference re CID disclosure, wage motion, etc. (.4); review and respond to emails re DOJ response, first day hearing, etc. (.5); multiple telephone calls with T. Moyron re CMS issues (.6).
10/24/24	S. Maizel	0.30	337.50	MED/CMS	Review CMS response to first day declaration.
10/24/24	T. Moyron	0.50	492.75	MED/CMS	Zoom conference with A. Curtis, et al., before hearing regarding background and next steps.
10/24/24	T. Moyron	0.40	394.20	MED/CMS	Zoom conference with A. Curtis, et al., after hearing regarding pending issues and next steps.
10/24/24	S. Maizel	1.50	1,687.50	MED/CMS	Review CMS suspension letter (.2); review HLB rebuttal letter to CMS (.3); revising complaint against CMS (.5); revising emergency motion against CMS (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/24	T. Moyron	0.50	492.75	MED/CMS	Zoom meeting with A. Curtis, et al., regarding potential meeting with GWC and related matters.
10/25/24	T. Moyron	0.10	98.55	MED/CMS	Analyze emails from L. Hill at DOJ re meeting.
10/25/24	T. Moyron	0.30	295.65	MED/CMS	Correspond with D. Schumacher and S. Maizel re meeting with DOJ.
10/25/24	S. Maizel	2.10	2,362.50	MED/CMS	Zoom conference with A. Curtis, etc. from DOJ and T. Moyron re CMS suspension issues (.3); zoom conference with C. Oppenheim, D. Schumacher, etc. re same (.3); zoom conference with R. Cetrulo, etc. re same (.4); review and respond to emails re same (.6); review and respond to emails re meeting with Fraud Section (.5).
10/25/24	S. Maizel	0.70	787.50	MED/CMS	Drafting additions to emergency motion re CMS suspension (.4); drafting revisions to complaint re CMS suspension (.3).
10/26/24	S. Maizel	0.70	787.50	MED/CMS	Zoom call with HLB and T. Moyron re DOJ issues (.3); review and respond to emails re same (.3); telephone conference with T. Moyron re same (.1).
10/26/24	S. Schrag	0.10	96.30	MED/CMS	Review correspondence from T. Moyron regarding stay motion.
10/26/24	T. Moyron	2.20	2,168.10	MED/CMS	Calls with HLB, S. Maizel, et al., and consideration of matters related to DOJ and litigation.
10/28/24	G. Miller	0.20	178.20	MED/CMS	Review correspondence with DOJ re Medicare suspension.
10/28/24	S. Maizel	2.00	2,250.00	MED/CMS	Research re application of section 362(b)(4) for emergency motion re CMS suspension.
10/28/24	S. Maizel	0.70	787.50	MED/CMS	Revising emergency motion re CMS suspension
10/28/24	S. Maizel	1.00	1,125.00	MED/CMS	Review and respond to emails re meeting with DOJ in Washington DC (.4); multiple telephone conference with T. Moyron re same (.2); review rebuttal letter in preparation for meeting (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/24	T. Moyron	0.40	394.20	MED/CMS	Call with S. Maizel regarding meeting with DOJ (.1); review correspondence from DOJ and S. Maizel regarding meeting (.1); correspondence with HLB re meeting (.2).
10/29/24	S. Maizel	2.30	2,587.50	MED/CMS	Review and respond to emails re meeting with DOJ in Washington DC (.3); review materials in preparation for meeting with DOJ bankruptcy attorneys (2.00).
10/30/24	T. Moyron	1.80	1,773.90	MED/CMS	Analyze issues related upcoming DOJ meeting (1.3); and related emails with HLB, et al., (.5).
10/30/24	S. Maizel	1.00	1,125.00	MED/CMS	Research re preclusion v. exclusion and other CMS remedies.
10/30/24	S. Maizel	1.90	2,137.50	MED/CMS	Multiple telephone conferences with T. Moyron re meeting with US Dept. of Justice attorneys (.2); review and respond to multiple emails re meeting (.7); revise notes for meeting with DOJ bankruptcy attorneys (1.0).
10/30/24	S. Maizel	1.00	1,125.00	MED/CMS	Review and revise complaint re CMS suspension.
10/31/24	S. Maizel	1.50	1,687.50	MED/CMS	Zoom conference with HLB attorneys re DOJ meeting re suspension (.8); multiple t/c with T. Moyron re same (.2); review and respond to emails re same (.5).
10/31/24	T. Moyron	1.40	1,379.70	MED/CMS	Analyze updated motion and complaint and redlines (1.3); prepare emails to S. Cenawood regarding same (.1).
10/31/24	T. Moyron	1.60	1,576.80	MED/CMS	Analyze DOJ presentation and provide comments thereto.
10/31/24	T. Moyron	1.00	985.50	MED/CMS	Zoom with R. Cetrulo, I. Lee, et al., regarding pending issues, including DOJ meeting, IDI, etc. re daily huddle.
10/31/24	T. Moyron	0.80	788.40	MED/CMS	Zoom with HLB, K. Greer, et al., regarding upcoming DOJ meeting and presentation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/24	D. Cook	0.90	769.50	MED/CMS	Zoom conference with T. Moyron, S. Maizel, K. Greer, D. Schumacher, C. Oppenheim, and C. Wicker concerning preparation for settlement meeting with government attorneys.
	Subtotal	51.60	53,396.10		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Alberts	\$ 1,107.00	0.30	\$ 332.10
S. Maizel	\$ 1,125.00	49.10	\$ 55,237.50
T. Labuda	\$ 1,431.00	1.40	\$ 2,003.40
T. Moyron	\$ 985.50	54.50	\$ 53,709.75
G. Miller	\$ 891.00	23.30	\$ 20,760.30
N. Hare	\$ 1,125.00	3.80	\$ 4,275.00
R. Garms	\$ 688.50	0.40	\$ 275.40
J.A. Moe, II	\$ 904.50	22.80	\$ 20,622.60
C. Doherty, Jr.	\$ 886.50	18.60	\$ 16,488.90
D. Cook	\$ 855.00	10.70	\$ 9,148.50
S. Schrag	\$ 963.00	0.50	\$ 481.50
S. Ruben	\$ 751.50	9.10	\$ 6,838.65
J. Margolies	\$ 396.00	1.60	\$ 633.60
D. Thomas-Nichols	\$ 423.00	2.50	\$ 1,057.50
G. Medina	\$ 418.50	3.90	\$ 1,632.15
K.M. Howard	\$ 391.50	<u>11.10</u>	<u>\$ 4,345.65</u>
Totals		213.60	\$ 197,842.50

Global Wound Care Medical Group, A Professional Corporation
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November 25, 2024

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	85,859.10
B120	Asset Analysis and Recovery	2,120.85
B150	Meetings of and Communications with Creditors	450.00
B160	Fee Applications/Employment Applications	50,549.40
B190	Other Contested Matters (excluding Assumption/Rejection Moti	156.60
B210	Business Operations	788.40
B220	Employee Benefits/Pension	886.95
B310	Claims Administration and Objections	267.30
B410	General Bankruptcy Advice/Opinions	275.40
EMP	Employment	3,092.40
MED/CMS	Medicare/CMS Issues	53,396.10
	Total Fees	\$197,842.50

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/22/2024	Delivery & Postage FedEx Airbill #280937383709 10/22/24 Delivery to Southern District of Texas HOUSTON, TX	21.83
10/22/2024	Delivery & Postage FedEx Airbill #280936698633 10/22/24 Delivery to 28464 MARLBORO AVE, EASTON, MD	28.16
10/22/2024	Delivery & Postage FedEx Airbill #280935898610 10/22/24 Delivery to U S Dept of Health&Human DALLAS, TX	21.83
10/22/2024	Delivery & Postage FedEx Airbill #280937048878 10/22/24 Delivery to 330 Independence Ave , SW WASHINGTON, DC	24.94
10/23/2024	Delivery & Postage ACE ATTORNEY 642245 DEL PRIORITY TO SAM MAIZEL 2	65.45
10/23/2024	Delivery & Postage ACE ATTORNEY 642245 DEL PRIORITY TO TANIA MOYRON	53.90
	SUBTOTAL	216.11

Global Wound Care Medical Group, A Professional Corporation
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<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/21/2024	Filing Filing Fee -- Petition	1,738.00
10/21/2024	Filing Motion to Appear Pro Hac	100.00
10/21/2024	Filing Motion to Appear Pro Hac	100.00
10/23/2024	Filing Filing Fee - Amendment	34.00
	SUBTOTAL	1,972.00
10/14/2024	Lexis SCHRAG\ SARAH	95.00
	SUBTOTAL	95.00
10/31/2024	Outside Professional Services CT Lien Solutions invoice 04076118 re USS lien searches.	1,732.00
10/31/2024	Outside Professional Services CT Lien Solutions invoice 04076128 re USS lien searches.	1,723.00
	SUBTOTAL	3,455.00
10/11/2024	WESTLAW SCHRAG\ SARAH	375.00
	SUBTOTAL	375.00
	Total Disbursements	\$6,113.11

Global Wound Care Medical Group, A Professional Corporation
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COMBINED TOTALS

Total Hours		213.60
Fee Total, all Matters	\$	197,842.50
Disbursement Total, all Matters	\$	6,113.11
Invoice Total, all Matters	\$	<u>203,955.61</u>

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

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

November 26, 2024

Invoice No. 2803308

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	229,060.80
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Please return this page with your payment
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Dentons US LLP
Dept. 3078
Carol Stream, IL 60132-3078

OR

Payment by wire transfer/ACH should be sent to:

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227 West Monroe, Chicago, IL 60606
ABA Transit #: 271070801
Account #: 0801051693
Account Name: Dentons US LLP
Swift Code: CITIUS33
Reference Invoice # and/or Client Matter #

****Please validate any request to change/update electronic payment instructions on
file or mailing address by contacting Dentons US LLP directly****

Please send payment remittance advice information to cashreceipts@dentons.com
In order to guarantee proper allocation of payments

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730
Questions relating to this invoice should be directed to:
S. Maizel
at 1 213 623 9300

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

November 26, 2024

Invoice No. 2803308

For Professional Services Rendered through November 25, 2024:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	T. Moyron	0.50	492.75	B110	Zoom with R. Cetrulo, K. Manning, K. Greer, et al., re pending issues, including IDI package and upcoming DOJ meeting.
11/01/24	S. Maizel	0.50	562.50	B110	Zoom conference with Ankura, R. Cetrulo, K. Manning, etc. re pending issues.
11/01/24	S. Maizel	0.40	450.00	B110	Multiple telephone conferences with T. Moyron re pending issues.
11/01/24	C. Doherty, Jr.	0.50	443.25	B110	Review and respond to emails and discuss matters regarding IDI and local procedures with T. Moyron (.4); review OCP Motion for Conformance with local requirements (.1).
11/04/24	C. Doherty, Jr.	1.60	1,418.40	B110	Review and prepare comments and analysis to IDI package and prepare for IDI meeting (.9); provide analysis relating to and prepare filing for certificate of no objection and passing second day hearing (.5); review and respond to emails regarding local procedures and case questions (.2).
11/04/24	G. Miller	0.70	623.70	B110	Prepare final order approving insurance motion.
11/04/24	G. Miller	0.20	178.20	B110	Call C. Doherty re second day hearing.
11/04/24	G. Miller	0.20	178.20	B110	Call T. Moyron re second day hearing.
11/04/24	S. Maizel	0.30	337.50	B110	Review and respond to emails re IRI documents for US Trustee.
11/04/24	T. Moyron	0.70	689.85	B110	Correspond with T. Tran, et al., regarding IDI package (.3); attention to issues related to IDI package (.2); analyze updated IDI package (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/04/24	T. Moyron	0.20	197.10	B110	Call with R. Cetrulo and K. Manning re follow up meetings and next step.
11/04/24	T. Moyron	0.20	197.10	B110	Call with G. Miller regarding OCP motion and second-day hearing.
11/05/24	T. Moyron	1.10	1,084.05	B110	Zoom with R. Cetrulo, K. Manning, et al., regarding DOJ meeting, questions and responses, and next steps (.6); analyze email from C. Wicker re DOJ questions (.2); analyze email from R. Cetrulo and responses to certain questions (.2); prepare email to D. Schumaker re sending responses to DOJ (.1).
11/05/24	G. Miller	0.30	267.30	B110	Call T. Moyron re OCP motion and going forward strategy.
11/05/24	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to emails concerning local procedures and case questions.
11/06/24	C. Doherty, Jr.	2.50	2,216.25	B110	Prepare for and attend IDI Call (2.0); Review and respond to emails concerning local procedures and case questions (.2); prepare certificate of no objections for first day motions and supervise filings of same (.3).
11/06/24	T. Moyron	1.80	1,773.90	B110	Call with R. Cetrulo, I. Lee, et al., in advance of IDI meeting re IDI package (.9); call with R. Freimuth from the UST, R. Cetrulo, I Lee, et al., regarding background, questions, and other case matters re IDI (.9).
11/06/24	S. Maizel	0.40	450.00	B110	Zoom conference with Ankura, R. Cetrulo, K. Manning, etc. re pending issues (.3); telephone conference with T. Moyron re same (.1).
11/06/24	S. Maizel	1.80	2,025.00	B110	Zoom conference with R. Cetrulo, Ankura, T. Moyron, etc. in preparation for IDI with US Trustee (.9); participate by zoom in IDI with US Trustee, R. Cetrulo, etc. (.9).
11/06/24	G. Medina	0.50	209.25	B110	Correspond with C. Doherty regarding certificates of no objection (0.1); review and file certificate of no objection for cash management motion and insurance motion (0.4).

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11/07/24	S. Maizel	1.10	1,237.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, T. Moyron, etc. re pending issues (.7); multiple telephone conferences with T. Moyron re same (.4).
11/07/24	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to emails regarding filings in case.
11/07/24	T. Moyron	0.50	492.75	B110	Zoom meeting with R. Cetrulo, K. Greer, I. Lee, et al, regarding finalization of responses to DOJ, documents for UST, and other matters.
11/07/24	S. Maizel	0.50	562.50	B110	Review and respond to emails re Dr. Ellington agreement (.4); email to S. McCandless re same (.1).
11/07/24	S. Maizel	0.40	450.00	B110	Review and revise Ellington message to clinicians re filing.
11/08/24	S. Maizel	0.40	450.00	B110	Zoom conference with Ankura, K. Manning, R. Cetrulo, T. Moyron, etc. re pending issues.
11/08/24	S. Maizel	0.50	562.50	B110	Zoom conference with S. Richards, PCO, regarding her appointment and work approach.
11/08/24	S. Maizel	0.50	562.50	B110	Zoom conference with Ankura and T. Moyron re US Trustee requests for documents, etc.
11/08/24	S. Maizel	0.40	450.00	B110	Review and respond to emails re comments to IDI documents.
11/08/24	S. Maizel	0.40	450.00	B110	Review and respond to emails re second day hearing on first day motions and certificate of no opposition.
11/08/24	T. Moyron	1.00	985.50	B110	Meeting with I. Lee, et al., regarding package for UST and related matters (.5); follow up meeting with I. Lee, et al., re same (.5).
11/08/24	T. Moyron	0.40	394.20	B110	Correspond with C. Doherty, et al., re hearing, certificate of no objection, etc.
11/08/24	T. Moyron	0.50	492.75	B110	Zoom conference with S. Richards, PCO, and S. Maizel regarding her appointment and work approach.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/08/24	T. Moyron	0.40	394.20	B110	Zoom meet with K. Manning, S. Maizel, I. Lee, et al., regarding timing of remaining responses to DOJ, IDI follow-up documents, SOFA, Schedules, and follow up call with K. Manning re same.
11/08/24	T. Moyron	1.60	1,576.80	B110	Analyze responses to DOJ (.3); correspond from D. Schumacher regarding same (.4); multiple calls with S. Maizel regarding same (.9).
11/11/24	S. Maizel	0.80	900.00	B110	Zoom conference with K. Greer, R. Cetrulo, K. Manning, Ankura, T. Moyron, etc. re pending issues (.6); multiple telephone conference with T. Moyron re same (.2).
11/11/24	S. Maizel	0.50	562.50	B110	Zoom conference with B. Kalogredis, R. Cetrulo, etc. re pending issues.
11/11/24	T. Moyron	1.00	985.50	B110	Zoom meeting with R. Cetrulo, et al., regarding pending matters, including DOJ responses and case matters re daily huddle (.6); follow up calls with S. Maizel re same (.2); follow-up call with K. Manning re same (.2).
11/11/24	T. Moyron	0.50	492.75	B110	Call with R. Cetrulo and counsel regarding background and questions.
11/11/24	S. Maizel	0.20	225.00	B110	Review and respond to emails re cancellation of "second day" hearing.
11/11/24	C. Doherty, Jr.	0.60	531.90	B110	Provide analysis concerning local practice and rules regarding first day motions and certificates of no objection and orders from court regarding same (.4); review and respond to emails regarding IDI materials and from service agent (.2).
11/12/24	S. Maizel	0.90	1,012.50	B110	Daily zoom conference with R. Manning, R. Cetrulo, Ankura, T. Moyron, etc. regarding pending issues (.7); multiple telephone conferences with T. Moyron re pending issues (.2).
11/12/24	T. Moyron	1.20	1,182.60	B110	Call with R. Cetrulo, K. Greer, K. Manning, et al., regarding de-brief on call with DOJ and further questions and responses needed, plus other open issues re daily huddle (.7); and follow up call with S. Maizel (.4); call with R. Cetrulo re same (.1).

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11/13/24	T. Moyron	2.70	2,660.85	B110	Analyze questions and responses and related documents (1.2); correspond with D. Schumacher, et al., re questions and responses (1.1); call with D. Schumacher and S. Maizel re same (.4).
11/13/24	S. Maizel	0.30	337.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues.
11/13/24	S. Maizel	0.20	225.00	B110	Zoom conference with R. Cetrulo, HLB attorneys, B. Kalogredis, etc. re pending issues.
11/14/24	S. Maizel	0.70	787.50	B110	Zoom conference with R. Cetrulo, K. Manning, I. Lee, etc. re pending issues (.4); review and respond to emails re pending issues (.3).
11/14/24	S. Maizel	1.80	2,025.00	B110	Zoom conference with DOJ attorneys and HLB attorneys re CMS issues (.5); multiple telephone conference with T. Moyron re settlement proposal to DOJ (.3); telephone conference with R. Cetrulo and T. Moyron re settlement proposal to DOJ (.2); telephone conference with I. Lee re same (.1); review and revise email to DOJ re settlement proposal (.7).
11/15/24	S. Maizel	0.80	900.00	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues.
11/15/24	G. Miller	0.40	356.40	B110	Emails with T. Moyron and C. Doherty re OCP motion (.2); Call with C. Doherty re same (.2).
11/15/24	T. Moyron	0.80	788.40	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues.
11/17/24	S. Maizel	0.20	225.00	B110	Telephone conference with C. Oppenheim, HLB, and T. Moyron re indemnification issues.
11/18/24	T. Moyron	0.60	591.30	B110	Correspond with T. Tran, K. Manning, et al., regarding wages and cash flow (.3); call with K. Manning regarding same and other matters (.3).
11/19/24	S. Maizel	0.50	562.50	B110	Zoom conference with R. Cetrulo, K. Manning, Ankura, etc. re pending issues.

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11/19/24	S. Maizel	0.20	225.00	B110	Review and respond to emails from PCO re meetings with Dr. Ellington and Dr. Releford.
11/19/24	C. Doherty, Jr.	0.60	531.90	B110	Prepare certificates of no objection for unobjected to motion and draft email (.3); review and respond to emails regarding pending motion (.1); review materials in IDI package from Ankura (.2).
11/20/24	C. Doherty, Jr.	0.40	354.60	B110	Supervise filing of certificates of no objection for motions (.1); research and provide analysis concerning adversary complaint (.3).
11/20/24	S. Maizel	0.50	562.50	B110	Zoom conference with R. Cetrulo, K. Manning, T. Moyron, Ankura, etc. re pending issues.
11/21/24	S. Maizel	0.30	337.50	B110	Review and respond to email from R. Cetrulo re biologic fees, etc.
11/21/24	S. Maizel	0.30	337.50	B110	Review and respond to emails re PCO interviews.
11/21/24	T. Moyron	1.00	985.50	B110	Daily huddle with client, HLB, and K. Greer re pending matters related to DOJ, potential stipulation and other matters (.6); Teams meeting with Ankura, S. Maizel, et al., regarding Schedules/SOFA (.4).
11/21/24	S. Maizel	0.70	787.50	B110	Daily zoom call with R. Cetrulo, K. Manning, I. Lee, etc. re pending issues (.6); review and respond to emails re same (.1).
11/21/24	S. Maizel	0.50	562.50	B110	Zoom conference with I. Lee, T. Tran, F. Feroz, etc. re reporting obligations, etc. (.4); review and respond to emails re same (.1).
11/22/24	S. Maizel	2.10	2,362.50	B110	Zoom call with Dr. Ellington and S. Richards, PCO, re PCO investigation (.8); multiple telephone conference with S. Richards re same (.2); zoom call with Dr. Releford, S. Richards and T. Moyron re same (1.0); review and respond to emails re same (.1).
11/22/24	S. Maizel	0.90	1,012.50	B110	Daily zoom conference with R. Cetrulo, K. Manning, K. Greer, Ankura, etc. re pending issues (.8); telephone conference with T. Moyron re same (.1) .

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/22/24	S. Maizel	1.40	1,575.00	B110	Zoom conference with Ankura, R. Cetrulo, T. Moyron, etc. re preparation of SOFA/SOAL.
11/22/24	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to written questions concerning local procedures regarding pending applications and motions.
11/22/24	T. Moyron	1.00	985.50	B110	Zoom meeting with PCO, Dr. Releford, and S. Maizel re questions and responses.
11/22/24	T. Moyron	1.40	1,379.70	B110	Call with R. Cetrulo, I. Lee, others at Ankura, et al. re Schedules/SOFA.
11/22/24	T. Moyron	0.70	689.85	B110	Attention to stipulation (.5) and call and correspondence with S. Schrag (.2).
11/22/24	T. Moyron	0.60	591.30	B110	Call with I. Lee re CRO role and other matters.
11/22/24	T. Moyron	0.90	886.95	B110	Daily zoom conference with R. Cetrulo, K. Manning, K. Greer, Ankura, etc. re pending issues (.8); t/c with S. Maizel re same (.1).
11/22/24	T. Moyron	0.90	886.95	B110	Correspond with R. Cetrulo regarding cash flow, vendors, and related matters (.5); correspond with I. Lee, et al., re SOFAs/SOAL (.3); correspond with I. Lee re invoices (.1).
11/23/24	S. Schrag	0.40	385.20	B110	Confer with T. Moyron, D. Cook, and S. Ruben regarding CRO retention.
11/24/24	S. Maizel	0.40	450.00	B110	Review and respond to emails from HLB re issues related to DOJ investigation and claims resolution.
11/25/24	T. Moyron	0.80	788.40	B110	Participate in daily huddle with R. Cetrulo, Ankura, et al. regarding pending matters, including draft stipulation with DOJ, CMS, etc.
	Subtotal	54.20	55,329.30		

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B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	S. Ruben	0.20	150.30	B160	Correspond with T. Moyron and G. Miller re draft Ankura retention application (.1); prepare Ankura retention application for filing (.1).
11/01/24	G. Miller	0.10	89.10	B160	Call with T. Moyron re OCP motion.
11/01/24	G. Miller	0.80	712.80	B160	Review caselaw re payment of professionals by third parties.
11/04/24	G. Miller	1.80	1,603.80	B160	Further prepare OCP motion
11/05/24	T. Moyron	0.50	492.75	B160	Analyze Ankura employment application and provide comment thereto (.3); correspond with S. Ruben, et al., re same (.2).
11/05/24	S. Ruben	0.60	450.90	B160	Correspond with T. Moyron, I. Lee, and G. Medina re Ankura retention application (.1); prepare Ankura retention application for filing (.5).
11/05/24	J.A. Moe, II	0.20	180.90	B160	In regard to the First Monthly Fee Application, review the "Knudsen " Motion, including a review of dates in the Motion, preliminarily review Judge Lopez's Personal Local Rules, and review forms of Interim Fee Applications.
11/05/24	G. Medina	0.60	251.10	B160	Correspond with S. Ruben regarding Ankura retention application (0.1); further correspond with S. Ruben regarding engagement letter (0.1); assemble and file Ankura employment application as financial and restructuring advisor (0.5).
11/06/24	J.A. Moe, II	0.80	723.60	B160	In regard to the First Monthly Fee Application, prepare a formatted draft of Dentons' First Monthly Fee Application, with required Chart (.60); review and revise the first formatted draft of the Monthly Fee Application (.20).
11/06/24	J.A. Moe, II	0.10	90.45	B160	In regard to the First Monthly Fee Application, review again Bankruptcy Judge Christopher Lopez Court Procedures.
11/08/24	G. Miller	0.10	89.10	B160	Emails with T. Moyron re OCP motion.

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11/15/24	C. Doherty, Jr.	0.20	177.30	B160	Review and respond to emails regarding OCP motion.
11/19/24	S. Maizel	0.20	225.00	B160	Review and revise CNO re Dentons employment application (.1); review and revise CNO re motion for interim fee application procedures (.1).
11/22/24	D. Cook	3.30	2,821.50	B160	Research and analyze CRO retention issue (2.9); prepare email memorandum with respect to same (.4).
11/22/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and D. Cook re Ankura retention.
11/22/24	T. Moyron	0.70	689.85	B160	Analyze issues related to CRO and next steps, including documents.
11/23/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron re drafting supplement to Ankura application.
11/24/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and S. Schrag re drafting supplement to Ankura application.
11/25/24	S. Ruben	3.30	2,479.95	B160	Draft supplement to Ankura application (3); emails with T. Moyron, C. Doherty, and G. Miller re the same (.2); conference with G. Miller re supplement to Ankura application (.1).
11/25/24	T. Moyron	1.30	1,281.15	B160	Analyze matters related to supplement expanding Ankura application with respect to CRO and procedure, including draft language and form (.7); call with C. Doherty re same (.2); analyze Ankura expanded agreement re CRO (.2); correspond with I. Lee re same (.2).
Subtotal		15.10	12,735.00		

B195 - Non-Working Travel

Date	Timekeeper	Hours	Amount	Task	Narrative
11/03/24	T. Moyron	7.80	7,686.90	B195	Travel from LA to DC for meeting with DOJ.
11/04/24	S. Maizel	7.00	7,875.00	B195	Travel to Washington DC for meeting with DOJ and HLB attorneys re CMS issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/05/24	S. Maizel	7.50	8,437.50	B195	Return travel from meeting with DOJ and HLB attorneys in Washington, DC to Los Angeles.
11/07/24	T. Moyron	7.40	7,292.70	B195	Travel back from East Coast to Los Angeles re post DOJ meeting.
	Subtotal	29.70	31,292.10		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
11/04/24	G. Miller	0.20	178.20	B310	Calls with K. Harman re UCC search.
	Subtotal	0.20	178.20		

EMP - Employment

Date	Timekeeper	Hours	Amount	Task	Narrative
11/11/24	S. Maizel	1.30	1,462.50	EMP	Zoom conference with S. McCandless and T. Moyron re pending employment issues (.8); multiple telephone conference with T. Moyron re employment issues (.2); review and respond to emails re employment agreements (.3).
11/13/24	S. Maizel	0.50	562.50	EMP	Review and respond to emails re succession agreement (.2); review succession agreement (.3).
11/14/24	S. Maizel	0.40	450.00	EMP	Review succession agreement (.3); emails with K. Kerry re same (.1).
11/15/24	S. Maizel	0.40	450.00	EMP	Review and respond to emails re succession agreement.
11/15/24	M. Borenstein	0.50	495.00	EMP	Review and assess draft Succession Agreement.
	Subtotal	3.10	3,420.00		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	S. Maizel	1.50	1,687.50	MED/CMS	Review CMS related documents in preparation for meeting with DOJ and HLB attorneys in Washington DC.

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11/01/24	T. Moyron	1.60	1,576.80	MED/CMS	All hands on meeting with R. Cetrulo, K. Greer, HLB, S. Maizel, et al., regarding upcoming DOJ meeting, including analysis of related topics, materials, and other matters (1.0); follow up call with R. Cetrulo and K. Manning re same (.4); calls with S. Maizel re same (.2).
11/01/24	D. Cook	1.30	1,111.50	MED/CMS	Zoom conference with T. Moyron, S. Maizel, HLB team, and client representatives to prepare for DOJ settlement conference (.9); telephone conference with T. Moyron concerning IRI language (.1); revise same and send to T. Tran for input to form (.3).
11/02/24	T. Moyron	1.50	1,478.25	MED/CMS	Analyze HLB materials and provide comments thereto (1.2); analyze S. Cenawood comments thereto (.3).
11/03/24	T. Moyron	0.40	394.20	MED/CMS	Analyze complaint, comments thereto, and provide comment thereto.
11/03/24	D. Cook	0.30	256.50	MED/CMS	Prepare complaint to enjoin CMS from suspending payments to client.
11/04/24	D. Cook	6.90	5,899.50	MED/CMS	Prepare motion to enforce automatic stay and enjoin CMS from suspending payments to debtor (.5); obtain and analyze materials briefing substance matter jurisdiction issue relating to Medicare dispute and prepare for DOJ settlement conference (1.8); participate in settlement conference with S. Maizel, T. Moyron, HLB team, and DOJ fraud and bankruptcy attorneys including client and attorney follow-up conference (4.6).
11/04/24	S. Maizel	5.00	5,625.00	MED/CMS	Prepare for meeting with DOJ and HLB attorneys re CMS issues (1.0); meeting with HLB attorneys and T. Moyron in preparation for meeting with DOJ attorneys re CMS issues (1.0); participate in meeting with DOJ and HLB attorneys re CMS issues (2.5); meeting with HLB attorneys, T. Moyron, and D. Cook re CMS issues raised in meeting (.7); telephone conference with R. Cetrulo, K. Manning, HLB, etc. re results of DOJ meeting re CMS issues (.8).

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11/04/24	T. Moyron	2.90	2,857.95	MED/CMS	Meetings with HLB (C. Oppenheim, C. Wicker, and D. Schumacher), DOJ (A. Curtis, L. Hill, etc.), S. Maizel, et al., regarding pending issues and potential resolution.
11/04/24	T. Moyron	1.30	1,281.15	MED/CMS	After meeting with DOJ, meetings with HLB and client re summary of meeting with DOJ, pending issues and next steps.
11/04/24	T. Moyron	0.90	886.95	MED/CMS	Prior to meeting with DOJ, meeting with HLB, including D. Schumacher, C. Wicker, and C. Oppenheim, S. Maizel and D. Cook in preparation for meeting with DOJ.
11/04/24	T. Moyron	0.40	394.20	MED/CMS	Call with S. Maizel re daily huddle and upcoming DOJ meeting.
11/04/24	S. Maizel	1.00	1,125.00	MED/CMS	Research re respond to jurisdictional arguments likely to be made by DOJ re CMS issues.
11/04/24	T. Moyron	0.40	394.20	MED/CMS	Call with C. Wicker regarding additional information and next steps.
11/05/24	T. Moyron	0.80	788.40	MED/CMS	Call with D. Schumacher regarding background, information and next steps.
11/05/24	T. Moyron	0.70	689.85	MED/CMS	Call with I. Lee regarding meeting with DOJ and related matters.
11/05/24	S. Maizel	1.00	1,125.00	MED/CMS	Multiple telephone conference with T. Moyron re CMS issues.
11/06/24	S. Maizel	1.80	2,025.00	MED/CMS	Review and respond to emails from DOJ re CMS issues (.7); multiple telephone conferences with T. Moyron re same (.5); review and respond to emails re responses to DOJ questions from meeting (.6).
11/07/24	T. Moyron	1.70	1,675.35	MED/CMS	Analyze responses to DOJ question (.9); correspond with HLB, K. Greer, et al., regarding same (.8).
11/07/24	T. Moyron	1.40	1,379.70	MED/CMS	Call with HLB (D. Schumacher, C. Oppenheim, C. Wicker, K. Greer, and S. Maizel regarding DOJ questions and responses.
11/07/24	S. Maizel	0.50	562.50	MED/CMS	Zoom conference with HLB, K. Greer, etc. re responding to DOJ inquiries (1.4); review and respond to emails re written responses.

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11/07/24	S. Maizel	0.20	225.00	MED/CMS	Review and respond to emails re responses to DOJ inquiries (.8); multiple telephone conferences with T. Moyron re same.
11/08/24	S. Maizel	0.90	1,012.50	MED/CMS	Review and respond to emails re responses to DOJ questions (.7); multiple telephone conferences with T. Moyron re same .
11/08/24	T. Moyron	0.20	197.10	MED/CMS	Call with C. Wicker regarding remaining responses to DOJ and related matters.
11/11/24	S. Maizel	0.60	675.00	MED/CMS	Review email correspondence related to DOJ questions.
11/11/24	T. Moyron	0.30	295.65	MED/CMS	Analyze emails from D. Shumacher re DOJ additional questions and responses (.2); forward email to client re additional questions (.1).
11/12/24	S. Maizel	1.30	1,462.50	MED/CMS	Telephone conference with T. Moyron re discussions with DOJ (.2); telephone conference with D. Schumacher re same (.1); zoom conference with DOJ, HHS OIG, USAO – ED Cal., VAOIG, etc. re pending issues (.9); telephone conference with T. Moyron re discussions with DOJ (.1).
11/12/24	S. Maizel	1.40	1,575.00	MED/CMS	Zoom conference with billing company, R. Cetrulo, K. Greer, etc. re responding to DOJ questions (.8); review and respond to emails re responding to DOJ inquiries (.6).
11/12/24	D. Cook	2.50	2,137.50	MED/CMS	Prepare complaint to enjoin CMS from payment suspension (1.6); zoom conference with Dentons, HLB and DOJ concerning payment suspension and global settlement (.9).
11/12/24	T. Moyron	1.30	1,281.15	MED/CMS	Call with DOJ (L. Hill, et al.), HLB (D. Shumacher, et al.), et al., regarding responses to questions and further questions re open issues (.9); calls with S. Maizel thereafter (.4).
11/12/24	T. Moyron	0.40	394.20	MED/CMS	Analyze emails from D. Shumacher, et al., regarding questions, responses, MSA, and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/12/24	T. Moyron	0.80	788.40	MED/CMS	Call with billing company, HLB, clients, et al, re questions and responses.
11/12/24	T. Moyron	0.20	197.10	MED/CMS	Correspond with C. Oppenheim regarding meetings (.1) and calls with R. Cetrulo and K. Manning re same (.1)
11/13/24	S. Maizel	3.80	4,275.00	MED/CMS	Zoom conference with Dr. Ellington, K. Manning, K. Greer, Ankura, etc. re responses to DOJ questions (2.4); telephone conference with C. Oppenheim, HLB, re pending DOJ questions (.4); multiple telephone conference with T. Moyron re responses to DOJ questions (.4); telephone conference with D. Schumacher and T. Moyron re responses to DOJ questions (.6).
11/13/24	T. Moyron	2.40	2,365.20	MED/CMS	Call with Dr. Ellington, Dr. Releford, K. Manning, R. Cetrulo, K. Greer and S. Maizel re questions and responses.
11/14/24	D. Cook	0.90	769.50	MED/CMS	Zoom conference with Dentons, HLB and DOJ concerning payment suspension and global settlement.
11/15/24	T. Moyron	2.50	2,463.75	MED/CMS	Zoom conference with DOJ and HLB attorneys re same (1.1); zoom conference with Dr. Releford, HLB attorneys, R. Cetrulo, etc. re same (.6); multiple calls with S. Maizel re same (.6); call with S. Maizel and D. Schumacher, HLB, re same (.2)
11/15/24	S. Maizel	3.20	3,600.00	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, etc. re CMS issues and possible settlement (.3); telephone conference with DOJ attorneys and HLB attorneys re CID response (.5) review and respond to emails re same (.3); zoom conference with DOJ and HLB attorneys re same (.7); zoom conference with Dr. Releford, HLB attorneys, R. Cetrulo, etc. re same (.6); multiple telephone conference with T. Moyron re same (.6); telephone conference with T. Moyron and D. Schumacher, HLB, re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/17/24	S. Maizel	1.20	1,350.00	MED/CMS	Telephone conference with T. Moyron re negotiations with DOJ re CMS overpayments (.2); zoom conference with Dr. Releford, K. Greer, K. Manning, R. Cetrulo, HLB attorneys, etc. re CMS overpayments analysis (1.0).
11/18/24	T. Moyron	0.50	492.75	MED/CMS	Zoom meeting with Dr. Releford, K. Manning, R. Cetrulo, HLB, and S. Maizel regarding call with DOJ and de-brief.
11/18/24	T. Moyron	2.00	1,971.00	MED/CMS	Call with R. Cetrulo, Dr. Releford, K. Manning, K. Greer, HLB (David Schumacher, etc), S. Maizel, et al., information for DOJ re background and overpayment.
11/18/24	T. Moyron	2.30	2,266.65	MED/CMS	Zoom meeting with client, HLB, et al., regarding materials for DOJ (.3); zoom meeting with client, HLB, et al, regarding materials for DOJ (.9); call with DOJ, HLB, S. Maizel, re overpayment and detail and potential settlement (.9); call with S. Maizel re same (.2).
11/19/24	S. Ruben	0.10	75.15	MED/CMS	Correspond with T. Moyron re draft declaration in support of emergency motion.
11/19/24	S. Maizel	3.50	3,937.50	MED/CMS	Zoom conference with A. Curtis, DOJ and T. Moyron re CMS settlement discussions (.3); revising complaint re CMS suspension (2.5); multiple telephone conference with T. Moyron re CMS settlement discussions (.7).
11/19/24	T. Moyron	2.70	2,660.85	MED/CMS	Analyze complaint and matters related to relief sought (.9); analyze updated complaint (.8); analyze and update background (.6); prepare email to HLB re complaint and background (.1); correspond with D. Cook and S. Ruben re complaint and declaration (.3).
11/19/24	T. Moyron	1.40	1,379.70	MED/CMS	Correspondence with K. Manning, HLB, et al., regarding documents, links, and related matters (1.2); calls with K. Manning re same (.2).
11/19/24	T. Moyron	0.10	98.55	MED/CMS	Prepare email to A. Curtis re details regarding cash flow and wages.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/19/24	D. Cook	3.50	2,992.50	MED/CMS	Prepare complaint for declaratory judgment and injunctive relief concerning Payment Suspension (1.8); prepare motion for TRO/injunctive relief concerning same (1.2); email correspondence with Dentons team concerning same (.2); telephone conferences with T. Moyron concerning complaint and motion (.3).
11/20/24	T. Moyron	0.60	591.30	MED/CMS	Call with I. Lee re DOJ matters, filings, and next steps (.5); call with I. Lee re Declaration in support of motion (.1).
11/20/24	T. Moyron	1.40	1,379.70	MED/CMS	Analyze and prepare declaration in support of motion.
11/20/24	T. Moyron	2.60	2,562.30	MED/CMS	Analyze and prepare complaint and various proposed changes thereto.
11/20/24	T. Moyron	0.90	886.95	MED/CMS	Call with DOJ, including. A. Curtis, et al., and S. Maizel re settlement negotiations and related matters and background.
11/20/24	T. Moyron	1.70	1,675.35	MED/CMS	Call with R. Cetrulo, K. Manning, Dr. Releford, HLB, I. Lee, and S. Maizel regarding call with DOJ and related matters (.9); calls with I. Lee and S. Maizel regarding same (.6); call with R. Cetrulo re same (.2).
11/20/24	S. Ruben	3.60	2,705.40	MED/CMS	Correspond with T. Moyron and D. Cook re draft stay motion (.1); draft declaration in support of adversary complaint (3.4); conference with T. Moyron re the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/20/24	S. Maizel	5.50	6,187.50	MED/CMS	Revising complaint re CMS suspension (2.0); review and respond to emails re same (.2); zoom conference with HLB attorneys, Dr. Releford, etc. re CMS negotiations (.5); zoom conference with A. Curtis and other DOJ attorneys, T. Moyron, re CMS suspension (1.0); zoom conference with Dr. Releford, R. Cetrulo, K. Manning, Ankura, HLB attorneys, etc. DOJ negotiations (.5); email to Dr. Releford, etc. re DOJ points re negotiation (.3); telephone conference with I. Lee and T. Moyron re same (.5); telephone conference with T. Moyron re same (.2); review and respond to emails re complaint against CMS re suspension (.3).
11/20/24	S. Maizel	0.80	900.00	MED/CMS	Revising motion to enforce the automatic stay against CMS.
11/20/24	D. Marrocco	2.30	2,722.05	MED/CMS	Review draft Complaint and Motion for Stay and related communications.
11/20/24	D. Cook	11.50	9,832.50	MED/CMS	Prepare complaint for declaratory judgment and injunctive relief concerning Payment Suspension (5.1); prepare motion for TRO/injunctive relief concerning same (4.2); analyze comments to foregoing and necessary revisions for incorporation into same (1.8); telephone conferences with T. Moyron concerning foregoing (.3); email correspondence with client concerning same (.1).
11/21/24	T. Moyron	0.50	492.75	MED/CMS	Call with A. Curtis, M. Schmergel, A. Wagner, and S. Maizel re developments, status, and next steps (.4); call with S. Maizel thereafter (.1).
11/21/24	S. Maizel	1.00	1,125.00	MED/CMS	Research re DOJ assertions re standard for application of 362(b)(4) exception to the automatic stay.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/21/24	S. Maizel	2.20	2,475.00	MED/CMS	Email to DOJ bankruptcy attorneys about potential terms of settlement re CMS suspension (.4); zoom conference with M. Schmergel, A. Curtis, etc. re CMS suspension (.3); review prior stipulations with CMS re Medicare suspensions re template for stipulation (1.0); multiple telephone conferences with T. Moyron re same (.3); email to R. Cetrulo, etc. re same (.2).
11/22/24	S. Maizel	0.40	450.00	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, etc. re pending investigation related issues (.3); telephone conference with I. Lee and T. Moyron re same (.1).
11/22/24	S. Maizel	0.40	450.00	MED/CMS	Zoom conference with M. Schmergel, A. Curtis, A. Warner, and T. Moyron re possible stipulation to resolve payment suspension (.2); review and respond to emails re same (.1); telephone conference with T. Moyron re same (.1).
11/22/24	S. Schrag	0.40	385.20	MED/CMS	Confer with T. Moyron regarding stipulation (.1); prepare stipulation (.3).
11/22/24	S. Schrag	0.30	288.90	MED/CMS	Confer with T. Moyron regarding CMS stipulation.
11/22/24	T. Moyron	0.40	394.20	MED/CMS	Correspond with clients regarding stipulation and discussions with DOJ.
11/22/24	T. Moyron	0.90	886.95	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, et al., re pending investigation related issues (.3); call with I. Lee and S. Maizel re same (.1); zoom conference with M. Schmergel, A. Curtis, A. Warner, and T. Moyron re possible stipulation to resolve payment suspension (.2); related correspondence (.2); call with S. Maizel re same (.1)
11/23/24	D. Cook	0.20	171.00	MED/CMS	Prepare email memorandum concerning CRO retention issue for T. Moyron and Dentons team review.
11/24/24	S. Schrag	3.90	3,755.70	MED/CMS	Prepare CMS stipulation (3.1); incorporate comments from S. Maizel (.4); confer with T. Moyron regarding the same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/24/24	S. Maizel	3.40	3,825.00	MED/CMS	Review and revise draft stipulation re Payment Suspension (3.0); review and respond to emails re same (.3);t/c with T. Moyron re same (.1).
11/25/24	S. Schrag	3.30	3,177.90	MED/CMS	Continue preparing stipulation with CMS (2.7); multiple correspondence and conferences with T. Moyron regarding the same (.4); confer with R. Cetrulo regarding the same (.2).
11/25/24	T. Moyron	4.40	4,336.20	MED/CMS	Analyze and prepare stipulation with DOJ (3.6); correspond with S. Maizel and S. Schrag regarding same (.8).
11/25/24	T. Moyron	0.30	295.65	MED/CMS	Prepare email to R. Cetrulo, K. Manning, et al., regarding draft stipulation (.1); call with Dr. Releford regarding same and next steps (.1); prepare email to A. Curtis, et al., attaching stipulation (.1).
Subtotal		126.40	126,106.20		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 1,125.00	79.70	\$ 89,662.50
T. Moyron	\$ 985.50	85.50	\$ 84,260.25
D. Marrocco	\$ 1,183.50	2.30	\$ 2,722.05
G. Miller	\$ 891.00	4.80	\$ 4,276.80
M. Borenstein	\$ 990.00	0.50	\$ 495.00
J.A. Moe, II	\$ 904.50	1.10	\$ 994.95
C. Doherty, Jr.	\$ 886.50	6.90	\$ 6,116.85
D. Cook	\$ 855.00	30.40	\$ 25,992.00
S. Schrag	\$ 963.00	8.30	\$ 7,992.90
S. Ruben	\$ 751.50	8.10	\$ 6,087.15
G. Medina	\$ 418.50	<u>1.10</u>	<u>\$ 460.35</u>
Totals		228.70	\$ 229,060.80

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November 26, 2024

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	55,329.30
B160	Fee Applications/Employment Applications	12,735.00
B195	Non-Working Travel	31,292.10
B310	Claims Administration and Objections	178.20
EMP	Employment	3,420.00
MED/CMS	Medicare/CMS Issues	126,106.20
	Total Fees	\$229,060.80

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COMBINED TOTALS

Total Hours	228.70
Fee Total, all Matters	\$ 229,060.80
	<hr/>
Invoice Total, all Matters	<u>\$ 229,060.80</u>

Two Invoices Attached to the Second Monthly Fee Statement

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

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

January 26, 2025

Invoice No. 2812703

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	93,978.95
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Please return this page with your payment
To pay by E-Check - <https://www.e-billexpress.com/ebpp/DentonsUS>

Payments by check should be sent to:

Dentons US LLP
Dept. 3078
Carol Stream, IL 60132-3078

OR

Payment by wire transfer/ACH should be sent to:

Citi Private Bank
227 West Monroe, Chicago, IL 60606
ABA Transit #: 271070801
Account #: 0801051693
Account Name: Dentons US LLP
Swift Code: CITIUS33
Reference Invoice # and/or Client Matter #

****Please validate any request to change/update electronic payment instructions on
file or mailing address by contacting Dentons US LLP directly****

Please send payment remittance advice information to cashreceipts@dentons.com
In order to guarantee proper allocation of payments

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730
Questions relating to this invoice should be directed to:
S. Maizel
at 1 213 623 9300

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

January 26, 2025

Invoice No. 2812703

For Professional Services Rendered through November 30, 2024:

Matter: 15816151-000002
Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	T. Moyron	1.30	1,281.15	B110	Correspondence with T. Tran, et al, regarding IDI package (.2) and review and provide comment thereto (.9); calls with C. Doherty re same (.2).
11/01/24	T. Moyron	1.00	985.50	B110	Multiple telephone conferences with S. Maizel re pending issues (.4); further emails from K. Manning, et al., and analysis regarding same re IDI (.6).
11/05/24	T. Moyron	0.10	98.55	B110	Correspond with T. Tran re IDI.
11/06/24	T. Moyron	0.40	394.20	B110	Zoom conference with Ankura, R. Cetrulo, K. Manning, et al., re pending issues (.3); telephone conference with T. Moyron re same (.1).
11/07/24	T. Moyron	0.30	295.65	B110	Calls with Kenya regarding various matters, including responses to DOJ.
11/07/24	T. Moyron	0.10	98.55	B110	Call with R. Cetrulo re pending matters.
11/08/24	T. Moyron	0.40	394.20	B110	Zoom conference with Ankura, K. Manning, R. Cetrulo, et al., re pending issues.
11/08/24	T. Moyron	0.50	492.75	B110	Zoom conference with Ankura and S. Maizel re US Trustee requests for documents, etc.
11/08/24	T. Moyron	0.30	295.65	B110	Attention to emails re comments to IRI documents.
11/08/24	T. Moyron	0.40	394.20	B110	Review and respond to emails re second day hearing on first day motions and certificate of no opposition.
11/12/24	T. Moyron	0.90	886.95	B110	Daily zoom conference with R. Manning, R. Cetrulo, Ankura, S. Maizel, et al., regarding pending issues (.7); multiple calls with S. Maizel re pending issues (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/14/24	T. Moyron	0.70	689.85	B110	Zoom conference with R. Cetrulo, K. Manning, I. Lee, etc. re pending issues (.4); review and respond to emails re pending issues (.3).
11/14/24	T. Moyron	1.10	1,084.05	B110	Correspond with R. Cetrulo and Ankura re cash flow (.3); analyze cash flow and related matters (8).
11/15/24	T. Moyron	0.20	197.10	B110	Analyze C. Doherty, et al., emails re OCP motion.
11/18/24	S. Maizel	0.20	225.00	B110	Review and respond to emails with PCO re interviews.
11/18/24	G. Miller	0.20	178.20	B110	Emails with T. Moyron and I. Lee re Equitable Life Insurance.
11/19/24	G. Miller	0.60	534.60	B110	Prepare certificates of no objection re Knudsen motion and Dentons' retention application.
11/19/24	G. Medina	0.40	167.40	B110	Review per the request of C. Doherty and prepare for filing CNO for DUS retention application and OCP motion.
11/19/24	T. Moyron	0.90	886.95	B110	Daily huddle with R. Cetrulo et al. re pending matters and attention to related issues.
11/20/24	T. Moyron	1.30	1,281.15	B110	Further analyze complaint and related issues.
11/21/24	K.M. Howard	0.40	156.60	B110	Review emails regarding meeting of creditors (.1); review docket to determine if 341(a) meeting of creditors has been postponed (.2); prepare email to team regarding same (.1).
11/22/24	G. Miller	0.20	178.20	B110	Review docket re meeting of creditors.
11/25/24	S. Maizel	0.80	900.00	B110	Daily zoom conference with R. Cetrulo, K. Manning, T. Moyron, I. Lee, etc. re pending issues.
11/25/24	K.M. Howard	1.40	548.10	B110	Review court orders in conjunction with updating Critical Dates Memorandum (.3); review Notice of Meeting of Creditors (.2); reconcile docketed dates with Critical Dates Memorandum (.3); review and revise Critical Dates Memorandum accordingly (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/25/24	K.M. Howard	0.10	39.15	B110	Analysis of GWC Team emails regarding the meeting of creditors.
11/26/24	T. Moyron	1.00	985.50	B110	Attend daily huddle regarding pending matters (.7) and call with S. Maizel re same (.3).
11/26/24	T. Moyron	0.30	295.65	B110	Analyze documents for UST and related emails (.2); prepare email to UST attaching documents and requesting MOR deadline extension (.1).
11/26/24	T. Moyron	0.30	295.65	B110	Attention to SOFA and Schedules (.2); prepare email to I. Lee and T. Tran re same (.1).
11/26/24	T. Moyron	0.40	394.20	B110	Attention to deadlines (.1); and prepare email to K. Howard, et al., re same (.1); analyze outstanding matters (.2) and prepare email to G. Miller, et al., re same (.1).
11/26/24	S. Maizel	1.00	1,125.00	B110	Daily zoom call with R. Cetrulo, K. Manning, Ankura, K. Greer, etc. re pending issues (.7); telephone conference with T. Moyron re same (.3).
11/26/24	S. Maizel	0.30	337.50	B110	Review and respond to emails re meeting of creditors and notice thereof.
11/26/24	S. Ruben	0.10	75.15	B110	Correspond with T. Moyron and I. Lee re schedules and SOFAs.
11/27/24	S. Maizel	0.90	1,012.50	B110	Zoom conference with R. Cetrulo, K. Manning, I. Lee, K. Greer, etc. re pending issues (.8); telephone conference with T. Moyron re same (.1).
11/27/24	T. Moyron	0.40	394.20	B110	Call with K. Manning regarding pending issues, including issues related to negotiations with DOJ and timing.
11/30/24	T. Moyron	0.60	591.30	B110	Correspondence with Ankura re schedules/SOFAs (.2); analyze excels re same and related matters (.4).
	Subtotal	19.50	18,190.35		

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B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	T. Moyron	0.20	197.10	B160	Attention to Ankura application.
11/18/24	G. Miller	0.20	178.20	B160	Further prepare OCP motion.
11/20/24	G. Medina	1.10	460.35	B160	Further request from C Doherty and comparative analysis of DUS retention and ordinary course professional orders attached to CNO's and edit to be consistent with filed versions (0.5); send CNO's to DUS retention and OCP motion to C. Doherty for review (0.2); file CNO's per the request of C. Doherty (0.4).
11/25/24	S. Maizel	0.60	675.00	B160	Review and revise Ankura Engagement Letter Addendum draft (.5); review and respond to emails re same (.1).
11/25/24	G. Miller	0.70	623.70	B160	Review supplements to retention applications re Ankura supplement to retention application (.5); call with S. Ruben re same (.2).
11/25/24	J.A. Moe, II	1.10	994.95	B160	Confer with Kathryn Howard re preparation Fee Application (.10); review draft of Dentons' First Monthly Statement (.10); E-Mail to Casey Doherty re the Knudsen Motion and Order (.10); review the Knudsen Motion and the Order (.10); revise Dentons' First Monthly Fee Statement (.40); review the revised Monthly Fee Statement and forward to Kathryn Howard (.10); exchange E-Mails with Sam Maizel on review and completion of Invoices (.10); E-Mail to Casey Doherty on insuring compliance with Houston procedures (.10).
11/25/24	K.M. Howard	0.80	313.20	B160	Email exchange with J. Moe regarding monthly fee application for partial October and November 2024 (.1); review followup email to J. Moe attaching initial draft of Dentons' Fee Application (.1); review draft (.4); review email from J. Moe regarding billing statements (.1); prepare response thereto (.1).
11/26/24	T. Moyron	1.40	1,379.70	B160	Attention to monthly fee application and related invoices.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/26/24	S. Ruben	3.30	2,479.95	B160	Emails with T. Moyron, C. Doherty, and G. Miller re supplement to Ankura retention application (.1); revise supplement to Ankura retention application and proposed order (2.6); conference with T. Moyron and S. Maizel re supplement to Ankura application (.5); correspond with S. Maizel, T. Moyron, and A. Curtis re Ankura addendum to engagement letter (.1).
11/26/24	S. Maizel	1.60	1,800.00	B160	Telephone conference with I. Lee, etc. re CRO retention related issues (.3); revising supplement to Ankura engagement letter re CRO role (.3); telephone conference with A. Curtis and T. Moyron re same (.3); review and respond to emails re same, including corporate practice of medicine issues (.7).
11/26/24	S. Maizel	0.90	1,012.50	B160	Review and respond to emails re preparation of first monthly fee application.
11/26/24	K.M. Howard	0.10	39.15	B160	Telephonic conference with J. Moe regarding Debtor's pending monthly fee application for November 2024.
11/26/24	K.M. Howard	1.60	626.40	B160	Prepare Dentons' First Monthly Fee Application for the period ending November 30, 2024.
11/26/24	C. Doherty, Jr.	0.70	620.55	B160	Provide analysis concerning local rules and practice regarding supplemental application for Ankura and provide comments to application (.6); review and respond to emails regarding entry or orders from court and administrative matters (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/26/24	J.A. Moe, II	1.10	994.95	B160	Review E-Mails re producing Statements (.1); E-Mail and telephone call to Ms. Arias, on preparing the draft Statement for late October and November (.20); telephone call to Casey Doherty discussing service of the Monthly Fee Statement (.10); review information from Casey Doherty and revise/expand the Monthly Fee Statement (.20), review the revised Monthly Fee Statement and return Mr. Doherty for review (.10); forward latest draft of the Monthly Fee Statement to K. Howard on commencing work on required Charts (.10); exchange E-Mails with S. Maizel on contents of and creating the "First Monthly Fee Statement," reviewing the Knudsen Motion on procedures (.20); telephone call to C. Doherty on First Monthly Statement (.10).
11/26/24	T. Moyron	1.70	1,675.35	B160	Analyze Ankura supplement and provide comments to S. Ruben (.8); analyze supplemental order (.2); correspond with S. Ruben, et al., re same (.4); analyze Ankura amendment to retention agreement (.2); and correspond with I. Lee re same (.1).
11/27/24	J.A. Moe, II	2.00	1,809.00	B160	Multiple telephone calls re preparation of First Monthly Fee Application (.7); review the November Invoice and the Dentons Fee Application (.20); telephone call with K. Howard re preparation of interim fee applications (.20); exchange E-Mails with S. Maizel and T. Moyron charge for travel time (.10); telephone calls to LaToya Payne on final Statement (.10); telephone calls with K. Howard on completing the Monthly Fee Statement and reflecting the fee reduction (.40); telephone calls with K. Howard on revisions to the draft Monthly Fee Statement (.10); additional telephone conference with K. Howard on completing the Statement and Charts (.20).
11/27/24	S. Ruben	0.80	601.20	B160	Correspond with T. Moyron re supplement to Ankura retention application (.1); revise the same (.6); conference with C. Sawyer re Ankura retention application (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/27/24	S. Maizel	0.20	225.00	B160	Review and respond to emails re preparation of first monthly fee application (.1); telephone conference with J. Moe re same (.1).
	Subtotal	20.10	16,706.25		

B410 - General Bankruptcy Advice/Opinions

Date	Timekeeper	Hours	Amount	Task	Narrative
11/25/24	R. Garms	1.30	895.05	B410	Review and revise appointment resolutions (1.1); e-mails regarding same (0.2).
	Subtotal	1.30	895.05		

EMP - Employment

Date	Timekeeper	Hours	Amount	Task	Narrative
11/08/24	S. McCandless	1.90	1,975.05	EMP	Review and consider information and related questions received from S. Maizel regarding status of employees following change in employment to new company and Medical Director Agreement with related comments and questions (1.60); respond regarding same (.30).
11/11/24	S. McCandless	1.20	1,247.40	EMP	Conference call with S. Maizel and T. Moyron to discuss pending employment issues (.80); further review Medical Director Agreement to prepare for same (.30); review related communication with K. Greer (.10).
11/11/24	T. Moyron	1.30	1,281.15	EMP	Zoom conference with S. McCandless and T. Moyron re pending employment issues (.8); multiple t/c with T. Moyron re employment issues (.2); review and respond to emails re employment agreements (.3).
11/11/24	T. Moyron	0.70	689.85	EMP	Attention to medical director agreement and related matters.
11/13/24	S. McCandless	0.90	935.55	EMP	Review succession agreement referenced in Ellington employment agreement (.70); communicate with S. Maizel regarding same (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/15/24	S. McCandless	0.20	207.90	EMP	Review M. Borenstein's comments on succession agreement.
	Subtotal	6.20	6,336.90		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
11/01/24	S. Cenawood	1.40	1,675.80	MED/CMS	Reviewed latest version of complaint and prepared suggested edits. Reviewed draft presentation to DOJ and prepared comments.
11/01/24	T. Moyron	1.40	1,379.70	MED/CMS	Analyze CMS related documents in preparation for meeting with DOJ and HLB attorneys in Washington DC.
11/01/24	T. Moyron	1.10	1,084.05	MED/CMS	Analyze materials and related matters (.6), and correspond with K. Manning, K. Greer, et al., re same (.5).
11/04/24	S. Cenawood	0.80	957.60	MED/CMS	Follow-up concerning presentation to DOJ. Additional attention to draft complaint.
11/05/24	T. Moyron	1.00	985.50	MED/CMS	Calls with S. Maizel re CMS issues.
11/06/24	T. Moyron	1.80	1,773.90	MED/CMS	Correspondence re DOJ re CMS issues (.7); calls with S. Maizel re same (.5); further analysis and correspondence re responses to DOJ questions from meeting (.6).
11/07/24	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel re same re DOJ matters.
11/08/24	T. Moyron	0.90	886.95	MED/CMS	Multiple telephone conferences with S. Maizel re second day hearing on first day motions and certificate of no opposition.
11/08/24	C. Montgomery	0.50	693.00	MED/CMS	Communications with T. Moyron regarding tax free reorganization under IRC section 368(a)(1)(D).
11/12/24	S. Cenawood	0.30	359.10	MED/CMS	Follow-up concerning status of discussions with government and potential adversarial proceeding in bankruptcy.
11/14/24	T. Moyron	0.10	98.55	MED/CMS	Prepare email to DOJ counsel, including A. Curtis re cash flow.
11/14/24	T. Moyron	0.20	197.10	MED/CMS	Correspond with DOJ counsel, including L. Hill, plus HLB, et al. re call.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/14/24	T. Moyron	0.50	492.75	MED/CMS	Correspond regarding timing of meeting (.2): analyze proposed responses to DOJ questions (.3).
11/14/24	T. Moyron	0.20	197.10	MED/CMS	Analyze email from K. Manning, et al., re ethics hotline and related matters.
11/14/24	T. Moyron	0.90	886.95	MED/CMS	Analyze DOJ proposal and related changes (.5) and correspondence from S. Maizel, et al., re same (.4).
11/14/24	T. Moyron	1.60	1,576.80	MED/CMS	Zoom conference with DOJ attorneys and HLB attorneys re CMS issues (.5); multiple calls with S. Maizel re settlement proposal to DOJ (.3); Call with R. Cetrulo and T. Moyron re settlement proposal to DOJ (.2); review and prepare correspondence re DOJ re settlement proposal (.6).
11/15/24	T. Moyron	0.60	591.30	MED/CMS	Attention to correspondence re settlement (.4); analyze email from I. Lee and related matters re biologics (.2).
11/18/24	S. Maizel	4.00	4,500.00	MED/CMS	Zoom call with Dr. Releford, R. Cetrulo, K. Manning, K. Greer, HLB attorneys, etc. re presentation of potential overpayments to DOJ (1.0); zoom call with Dr. Releford, R. Cetrulo, HLB, etc. re same (.3); zoom conference with Dr. Releford, R. Cetrulo, HLB attorneys, etc. re same (.9); t/c with T. Moyron re same (.2); zoom conference with DOJ attorneys, including A. Curtis, HLB attorneys, T. Moyron, etc. re negotiations re potential overpayments (.9); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.5).
11/19/24	S. Cenawood	0.70	837.90	MED/CMS	Additional review and editing of complaint and motion to address government exclusion decision.
11/20/24	S. Cenawood	0.90	1,077.30	MED/CMS	Additional attention to draft complaint and request for preliminary injunction. Pulled prior examples of application for TRO/P1. Reviewed latest version of draft complaint and draft motion to enforce bankruptcy stay.

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/22/24	S. Maizel	0.40	450.00	MED/CMS	Zoom conference with M. Schmergel, A. Curtis, A. Warner, and T. Moyron re possible stipulation to resolve payment suspension (.2); review and respond to emails re same (.1); telephone conference with T. Moyron re same (.1).
11/24/24	T. Moyron	2.40	2,365.20	MED/CMS	Attention to CMS draft stipulation.
11/25/24	S. Maizel	2.20	2,475.00	MED/CMS	Revising stipulation with DOJ re Payment Suspension (.9); zoom conference with A. Curtis, A. Warner, I. Lee and T. Moyron re CRO and other stipulation related issues (.5); telephone conference with T. Moyron re same (.3); review and respond to emails re same (.5).
11/25/24	S. Maizel	0.80	900.00	MED/CMS	Telephone conference with T. Moyron and I. Lee re CRO related issues, etc. (.2); review and respond to emails re corporate resolution appointing CRO (.5); telephone conference with C. Doherty re local practice on appointing CRO (.1).
11/25/24	S. Cenawood	0.30	359.10	MED/CMS	Follow-up concerning status of discussions with DOJ and potential bankruptcy filings.
11/26/24	S. Maizel	0.70	787.50	MED/CMS	Review and respond to emails re stipulation with DOJ re payment suspension (.5); telephone conference with T. Moyron re same (.2).
11/26/24	T. Moyron	1.00	985.50	MED/CMS	Analyze email from A. Curtis re CRO, I. Lee and supplement (.1); calls with S. Maizel re same (.2); call with HLB, S. Maizel and I. Lee re DOJ comment re CRO (.3); follow up emails from HLB, et al., re same regarding further amendment to amended retention application (.4).
11/27/24	T. Moyron	0.40	394.20	MED/CMS	Call with I. Lee regarding pending matters, including negotiations regarding stipulation and timing.
11/27/24	T. Moyron	0.30	295.65	MED/CMS	Call with A. Curtis re negotiations regarding stipulation, timing and mechanics of turning reimbursements back on, etc.
11/27/24	T. Moyron	0.30	295.65	MED/CMS	Analyze email from A. Curtis re stipulation (.1); analyze redline re stipulation (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/27/24	T. Moyron	1.00	985.50	MED/CMS	Participate in daily huddle with K. Manning, K. Greer, R. Cetrulo, I. Lee, et al., regarding pending issues, including materials for DOJ, timing, and related issues (.9); call with I. Lee re same (.1).
11/27/24	T. Moyron	0.20	197.10	MED/CMS	Correspond with A. Curtis re matters related to CRO engagement and hospice related claims (.1); prepare email to R. Cetrulo re same (.1).
11/27/24	T. Moyron	1.70	1,675.35	MED/CMS	Analyze materials in zip for DOJ (1.6); prepare email to T. Tran, et al., re same (.1).
11/27/24	T. Moyron	0.10	98.55	MED/CMS	Prepare email to A. Curtis, et al., re materials sent by Ankura.
11/27/24	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails hospice related claims statistics (.2); telephone conference with T. Moyron re same (.1).
11/27/24	S. Maizel	1.00	1,125.00	MED/CMS	Zoom conference with DOJ attorneys and T. Moyron re stipulation (.5); review email with revised stipulation re payment suspension from DOJ (.5).
11/27/24	S. Maizel	0.70	787.50	MED/CMS	Review and respond to emails re self-reporting rules (.2); review rules on self-reporting (.5).
11/28/24	T. Moyron	0.80	788.40	MED/CMS	Analyze draft revised stipulation received from DOJ bankruptcy lawyers.
11/28/24	S. Maizel	1.70	1,912.50	MED/CMS	Revising draft stipulation with DOJ over payment suspension (1.5); review and respond to emails re same (.1); telephone conference with T. Moyron re same (.1) .
11/29/24	S. Maizel	4.70	5,287.50	MED/CMS	Zoom conference with Dr. Releford, R. Cetrulo, K. Manning, K. Greer, I. Lee, etc. re stipulation with DOJ over payment suspension (1.3); two zoom conferences with I. Lee and T. Moyron re same (1.2); zoom conference with A. Warner, DOJ, and T. Moyron re same (.4); zoom conference with D. Schumacher, Dr. Releford, K. Manning, R. Cetrulo, T. Moyron, I. Lee, etc. re same (.5); revising stipulation (.5); review and respond to emails re same (.4); multiple t/c with T. Moyron re same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
11/29/24	T. Moyron	2.80	2,759.40	MED/CMS	Further review of proposed changes to DOJ revised stipulation (.8); daily huddle with R. Cetrulo, Dr. Releford, et al., regarding revised stipulation received from DOJ on 11/27 (1.3); call with I. Lee, T. Tran and S. Maizel regarding changes to stipulation (.7).
11/29/24	T. Moyron	0.40	394.20	MED/CMS	Call with Andrew from DOJ regarding stipulations, changes and related matters.
11/29/24	T. Moyron	2.70	2,660.85	MED/CMS	Analyze updated stipulation, prepare and finalize stipulation and creat redlines (2.6); prepare email to Dr. Releford, et al., attahing same (.1).
11/29/24	T. Moyron	0.50	492.75	MED/CMS	Call with Ankura and S. Maizel re stipulation.
11/29/24	T. Moyron	0.60	591.30	MED/CMS	Call with Dr. Releford, et al, regarding updated stipulation (.5); call with S. Maizel thereafter re same (.1).
11/29/24	T. Moyron	0.10	98.55	MED/CMS	Correspond with D. Schumacher re stipulation.
	Subtotal	47.20	49,948.20		

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TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 1,125.00	23.00	\$ 25,875.00
T. Moyron	\$ 985.50	44.00	\$ 43,362.00
G. Miller	\$ 891.00	1.90	\$ 1,692.90
R. Garms	\$ 688.50	1.30	\$ 895.05
S. Cenawood	\$ 1,197.00	4.40	\$ 5,266.80
S. McCandless	\$ 1,039.50	4.20	\$ 4,365.90
J.A. Moe, II	\$ 904.50	4.20	\$ 3,798.90
C. Doherty, Jr.	\$ 886.50	0.70	\$ 620.55
C. Montgomery	\$ 1,386.00	0.50	\$ 693.00
S. Ruben	\$ 751.50	4.20	\$ 3,156.30
G. Medina	\$ 418.50	1.50	\$ 627.75
K.M. Howard	\$ 391.50	<u>4.40</u>	<u>\$ 1,722.60</u>
Totals		94.30	\$ 92,076.75

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	18,190.35
B160	Fee Applications/Employment Applications	16,706.25
B410	General Bankruptcy Advice/Opinions	895.05
EMP	Employment	6,336.90
MED/CMS	Medicare/CMS Issues	49,948.20
	Total Fees	\$92,076.75

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DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/29/2024	Airfare Samuel R. Maizel, Airfare re travel to Washington DC for meeting with US Dept. of Justice.	513.98
10/29/2024	Airfare Samuel R. Maizel, Agent fee re airfare re travel to Washington DC for meeting with US Dept. of Justice.	45.00
10/29/2024	Airfare Samuel R. Maizel, Airfare re travel to Washington DC for meeting with US Dept. of Justice.	327.11
11/7/2024	Airfare Tania M. Moyron, Agent fee to change flight home	20.00
	SUBTOTAL	906.09
11/4/2024	Ground Transportation Tania M. Moyron, Uber fare from Dulles to Washington DC hotel	161.56
11/5/2024	Ground Transportation Tania M. Moyron, Uber fare in Washington DC for DOJ meeting	35.75
11/8/2024	Ground Transportation Tania M. Moyron, Uber home after trip to DC for DOJ meetings	108.51
11/4/2024	Ground Transportation Samuel R. Maizel, Taxi re travel to Washington DC for meeting with US Dept. of Justice.	48.00
11/5/2024	Ground Transportation Samuel R. Maizel, Transportation home after flight re travel to Washington DC for meeting with US Dept. of Justice.	111.32
11/5/2024	Ground Transportation Samuel R. Maizel, Taxi from hotel to airport re travel to Washington DC for meeting with US Dept. of Justice.	97.32
	SUBTOTAL	562.46
11/5/2024	Lodging Samuel R. Maizel, Hotel in DC for meetings with the US Dept. of Justice.	374.00
	SUBTOTAL	374.00
11/5/2024	Lodging Tax	59.65
	SUBTOTAL	59.65
	Total Disbursements	\$1,902.20

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COMBINED TOTALS

Total Hours		94.30
Fee Total, all Matters	\$	92,076.75
Disbursement Total, all Matters	\$	1,902.20
Invoice Total, all Matters		<hr/>
	\$	<u>93,978.95</u>

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

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

January 27, 2025

Invoice No. 2817907

Client: 15816151

Payment Due Upon Receipt

Total This Invoice	\$	307,149.75
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S. Maizel
at 1 213 623 9300

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

January 27, 2025

Invoice No. 2817907

For Professional Services Rendered through December 31, 2024:

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Post-Petition

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	S. Maizel	0.50	562.50	B110	Daily zoom call re pending issues with R. Cetrulo, K. Manning, K. Greer, I. Lee, etc.
12/02/24	S. Maizel	1.00	1,125.00	B110	Zoom call with R. Cetrulo, I. Lee, T. Tran, etc. re preparation of SOFA/SOAL.
12/02/24	T. Moyron	0.50	492.75	B110	Daily zoom call re pending issues with R. Cetrulo, K. Manning, K. Greer, I. Lee, et al.
12/02/24	T. Moyron	1.00	985.50	B110	Zoom call with R. Cetrulo, I. Lee, T. Tran, et al., re preparation of SOFA/SOAL.
12/02/24	T. Moyron	0.10	98.55	B110	Call with R. Cetrulo re pending matters.
12/02/24	S. Ruben	0.10	75.15	B110	Correspond with C. Doherty and team re upcoming case deadlines.
12/02/24	G. Miller	2.30	2,049.30	B110	Review draft schedules and statements.
12/02/24	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to emails regarding local practice for professional applications.
12/02/24	C. Doherty, Jr.	0.10	88.65	B110	Call with J. Moe regarding local practice for professional applications.
12/03/24	G. Miller	2.50	2,227.50	B110	Prepare global notes to schedules and statements and emails with Ankura re same.
12/03/24	G. Miller	1.40	1,247.40	B110	Call re schedules and statements.
12/03/24	S. Maizel	0.90	1,012.50	B110	Daily zoom conference with R. Cetrulo, K. Manning, K. Greer, T. Moyron, I. Lee, etc. re pending issues.
12/03/24	S. Maizel	2.00	2,250.00	B110	Zoom conference with R. Cetrulo, Ankura, etc. re SOFA/SOAL (1.4); telephone conference with T. Moyron re same (.1); review draft of SOFA/SOAL (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/03/24	S. Maizel	0.40	450.00	B110	Zoom conference with HLB attorneys and T. Moyron re pending issues.
12/03/24	T. Moyron	1.70	1,675.35	B110	Analyze schedules/SOFA and global notes and provide comments thereto.
12/03/24	S. Ruben	0.10	75.15	B110	Correspond with T. Moyron and G. Miller re global notes to schedules and SOFAs.
12/03/24	T. Moyron	0.70	689.85	B110	Conference call with C. Oppenheim, C. Schumacher, and S. Maizel re background and matters related to settlement and next steps.
12/03/24	T. Moyron	0.90	886.95	B110	Daily zoom conference with R. Cetrulo, K. Manning, K. Greer, S. Maizel, I. Lee, et al., re pending issues.
12/03/24	T. Moyron	2.00	1,971.00	B110	Zoom conference with R. Cetrulo, Ankura, et al., re SOFA/SOAL (1.4); telephone conference with S. Maizel re same (.1); review draft of SOFA/SOAL (.5).
12/03/24	T. Moyron	0.40	394.20	B110	Zoom conference with HLB attorneys and S. Maizel re pending issues.
12/03/24	T. Moyron	2.60	2,562.30	B110	Further analysis of agreements, Schedules, and SOFA, etc.
12/04/24	T. Moyron	1.00	985.50	B110	Daily zoom conference with R. Cetrulo, K. Manning, I. Lee, S. Maizel, et al., re pending issues, including review of monthly operating report.
12/04/24	T. Moyron	3.40	3,350.70	B110	Review of draft SOFA/SOAL with Ankura, R. Cetrulo, et al. (2.0); call with S. Maizel re same (.1); analyze global notes and provide comment and correspondence regarding same (1.3).
12/04/24	K.M. Howard	0.10	39.15	B110	Analysis of emails regarding the deadlines for filing schedules and statement of financial affairs.
12/04/24	C. Doherty, Jr.	0.10	88.65	B110	Review and respond to emails from parties in interest concerning case.
12/04/24	S. Maizel	1.00	1,125.00	B110	Daily zoom conference with R. Cetrulo, K. Manning, I. Lee, T. Moyron, etc. re pending issues, including review of monthly operating report.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/04/24	S. Maizel	2.10	2,362.50	B110	Review of draft SOFA/SOAL with Ankura, R. Cetrulo, etc. (2.0); telephone conference with T. Moyron re same (.1).
12/04/24	S. Maizel	2.10	2,362.50	B110	Review of draft SOFA/SOAL with Ankura, R. Cetrulo, etc. (2.0); telephone conference with T. Moyron re same (.1).
12/04/24	G. Medina	0.60	251.10	B110	Correspond with T. Moyron regarding filing SOFA and SOAL (0.1); file SOFA and SOAL and send filed pleadings to I. Lee, T. Moyron, G. Miller, S. Maizel, A. Wagner and T. Tran (0.5).
12/04/24	G. Miller	1.90	1,692.90	B110	Calls with GWC, Dentons and Ankura re finalization of schedules and statements.
12/04/24	G. Miller	1.60	1,425.60	B110	Further prepare global notes re schedules and statements (1.2); calls with T. Moyron re same (.4).
12/05/24	C. Doherty, Jr.	0.20	177.30	B110	Review and respond to emails concerning case of administration and service of documents.
12/05/24	G. Miller	0.70	623.70	B110	Review critical dates memorandum and emails with C. Doherty re same.
12/05/24	D. Thomas-Nichols	0.10	42.30	B110	Correspond with T. Moyron regarding workstream memo.
12/05/24	T. Moyron	0.70	689.85	B110	Participate in daily huddle with R. Cetrulo, I. Lee, et al., regarding pending issues, including materials for DOJ.
12/05/24	S. Maizel	0.90	1,012.50	B110	Daily zoom call with R. Cetrulo, K. Manning, I. Lee, T. Moyron, etc. re pending issues (.7); telephone conference with T. Moyron re same (.2).
12/05/24	T. Moyron	0.30	295.65	B110	Correspond with Verita, et al. re bar date motion (.2) and correspond with D. Nichols re workstream memo (.1).
12/06/24	T. Moyron	0.80	788.40	B110	Zoom conference with Ankura, R. Cetrulo, et al., re MOR revisions (.5); review and respond to emails re filing same (.3).
12/06/24	T. Moyron	0.20	197.10	B110	Analyze vendor contract.
12/06/24	S. Maizel	0.80	900.00	B110	Zoom conference with Ankura, R. Cetrulo, etc. re MOR revisions (.5); review and respond to emails re filing same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/06/24	G. Medina	0.70	292.95	B110	Correspond with T. Moyron and T. Tran regarding MOR filing (0.1); receive and prepare for filing October 2024 MOR and send for review (0.3); file MOR and send to T. Tran, T. Moyron, S. Maizel and I. Lee (0.3).
12/07/24	C. Doherty, Jr.	0.10	88.65	B110	Attention to emails regarding Ankura Supplemental Application.
12/07/24	S. Maizel	0.10	112.50	B110	Review and respond to emails re revised MOR for filing.
12/09/24	C. Doherty, Jr.	0.20	177.30	B110	Prepare draft letter to bank.
12/09/24	C. Doherty, Jr.	0.30	265.95	B110	Conduct research re potential automatic stay violation of third party.
12/09/24	C. Doherty, Jr.	1.00	886.50	B110	Attend prep call for section 341 meeting.
12/09/24	G. Medina	0.20	83.70	B110	Review request from T. Moyron and send SOFA and SOAL to R. Certulo.
12/09/24	S. Maizel	0.10	112.50	B110	Review and respond to email from Massachusetts Dept. of Revenue.
12/09/24	T. Moyron	1.20	1,182.60	B110	Calls with R. Cetrulo regarding call with bank representative and threatened action (.2); call with bank regarding detail received from client (.5); email from S. Weyler re discussion with bank representative (.1), and prepare email re same (.1); emails with C. Taylor, et al., re same (.2), and calls with S. Maizel re same (.1).
12/09/24	T. Moyron	0.80	788.40	B110	Daily huddle with R. Cetrulo, I. Lee, K. Manning, et al., regarding pending issues, including DOJ stipulation, liquidity, vendors, and other matters (.6); call with S. Maizel re same (.2).
12/09/24	S. Maizel	0.80	900.00	B110	Daily zoom call with R. Cetrulo, K. Manning, T. Moyron, I. Lee, etc. re pending issues (.6); telephone conference with T. Moyron re same (.2).
12/09/24	S. Maizel	1.20	1,350.00	B110	Zoom conference with R. Cetrulo, A. Wagner, I. Lee, T. Tran, T. Moyron, etc. re preparation for meeting of creditors (.7); attend meeting of creditors with US Trustee (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/09/24	T. Moyron	1.30	1,281.15	B110	Preparation for 341(a) meeting with R. Cetrulo, I. Lee, et al. and attention to related issues.
12/09/24	T. Moyron	1.20	1,182.60	B110	Participate in section 341(a) meeting with UST, R. Cetrulo, et al. and attention to related matters.
12/10/24	T. Moyron	0.20	197.10	B110	Daily huddle with R. Cetrulo, et al., regarding pending matters.
12/10/24	S. Maizel	0.60	675.00	B110	Daily zoom conference with R. Cetrulo, K. Manning, K. Greer, I. Lee, etc. re pending issues (.2); telephone conference with T. Moyron re same (.1); zoom conference with Dr. Releford, HLB attorneys, K. Manning, K. Greer, etc. re pending issues (.1); multiple telephone conference with T. Moyron re same (.2).
12/11/24	S. Maizel	0.20	225.00	B110	Telephone conference with R. Millien, Gen. Counsel, re pending IP related issues.
12/11/24	T. Moyron	1.00	985.50	B110	Daily huddle with R. Cetrulo, et al. re pending matters (.4); call with R. Cetrulo thereafter re DOJ presentation (.3); call with S. Maizel and I. Lee re pending matters, including DOJ issues (.3).
12/11/24	S. Maizel	1.00	1,125.00	B110	Zoom conference with R. Cetrulo, I. Lee, K. Manning, T. Moyron, K. Greer, etc. re pending issues (.4); telephone conference with T. Moyron re same (.1); telephone conference with I. Lee and T. Moyron re same (.5).
12/12/24	T. Moyron	0.10	98.55	B110	Analyze email from M. Salazar-Rosenbloom re bank account.
12/13/24	T. Moyron	0.50	492.75	B110	Daily huddle with R. Cetrulo, I. Lee, et al., regarding pending matters, including discussion regarding status of stipulation and settlement offer (.3); call with I. Lee re same (.2).
12/13/24	T. Moyron	0.20	197.10	B110	Correspond with N. Hare, et al., re communications.
12/13/24	S. Maizel	0.50	562.50	B110	Daily zoom call with R. Cetrulo, I. Lee, K. Manning, K. Greer, T. Moyron, etc. re pending issues (.4); telephone conference with T. Moyron re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/16/24	S. Maizel	0.60	675.00	B110	Zoom conference with N. Hare, etc. re communications planning (.4); review and respond to emails re same (.2).
12/16/24	N. Hare	0.50	562.50	B110	Conference call with S. Maizel, T. Moyron and J. Richardson regarding upcoming PR needs for DOJ settlement.
12/16/24	S. Maizel	1.30	1,462.50	B110	Daily zoom call with R. Cetrulo, K. Manning, I. Lee, T. Moyron, re pending issues (.9); telephone conference with T. Moyron re same (.4).
12/16/24	T. Moyron	1.30	1,281.15	B110	Zoom call with R. Cetrulo, K. Manning, I. Lee, S. Maizel, re pending issues (.9); call with S. Maizel re same (.4).
12/16/24	T. Moyron	0.20	197.10	B110	Correspondence with N. Hare, etc. re communications planning.
12/17/24	T. Moyron	0.20	197.10	B110	Call with S. Maizel re pending issues.
12/17/24	T. Moyron	0.50	492.75	B110	Daily huddle with R. Cetrulo, K. Manning, I Lee, et al. regarding pending issues.
12/17/24	S. Maizel	0.70	787.50	B110	Daily zoom conference with R. Cetrulo, K. Manning, I. Lee, etc. re pending issues (.5); telephone conference with T. Moyron re same (.2).
12/18/24	S. Maizel	0.50	562.50	B110	Call with R. Cetrulo, K. Manning, I. Lee, K. Greer, T. Moyron, etc. re pending issues (.4); review and respond to emails re same (.1).
12/18/24	S. Schrag	0.30	288.90	B110	Confer with T. Moyron regarding critical dates memorandum (.1); confer with T. Moyron regarding bar date motion (.1); confer with T. Moyron regarding case administration (.1).
12/18/24	G. Miller	1.90	1,692.90	B110	Prepare motion to seal exhibit to stipulation (1.5); Call with T. Moyron re same (.4).
12/19/24	S. Maizel	0.50	562.50	B110	Daily zoom call with R. Cetrulo, K. Manning, K. Greer, T. Moyron, etc. re pending issues (.3); multiple telephone conference with T. Moyron re same (.2).
12/19/24	G. Miller	0.40	356.40	B110	Call with T. Moyron and S. Maizel re case strategy.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/19/24	S. Schrag	0.10	96.30	B110	Confer with T. Moyron regarding critical dates memorandum and upcoming statutory requirements.
12/19/24	T. Moyron	0.80	788.40	B110	Daily huddle with K. Manning, R. Cetrulo, et al., regarding pending matters including stipulation and next steps and materials for DOJ in connection with potential settlement and follow up regarding inquiries related to stipulation.
12/19/24	T. Moyron	1.30	1,281.15	B110	Analyze Verita agreement (.2); call with I. Lee and S. Maizel re same (1.1).
12/20/24	G. Miller	0.40	356.40	B110	Review administrative services agreement.
12/20/24	S. Maizel	0.60	675.00	B110	Daily zoom call with R. Cetrulo, K. Manning, R. Millien, T. Moyron, I. Lee, etc. re pending issues (.3); telephone conference with T. Moyron re same (.3).
12/23/24	S. Maizel	0.50	562.50	B110	Daily zoom call with K. Greer, R. Cetrulo, K. Manning, T. Moyron, HLB attorneys, etc. re pending issues (.4); telephone conference with T. Moyron re same (.1).
12/24/24	T. Moyron	0.20	197.10	B110	Daily huddle with GWC, HLB, etc. re pending issues.
12/26/24	S. Schrag	0.50	481.50	B110	Review material regarding statutory deadlines and confer with T. Moyron regarding the same.
12/26/24	S. Maizel	0.20	225.00	B110	Multiple telephone conferences with T. Moyron re pending issues.
12/30/24	T. Moyron	0.60	591.30	B110	Daily huddle with R. Cetrulo, et al., re bk stipulation, settlement and proposed numbers, upcoming DOJ call, etc. (.4); call with D. Schumacher re same (.2).
12/30/24	S. Maizel	0.40	450.00	B110	Zoom conference with R. Millien and T. Moyron re pending business issues.
	Subtotal	68.00	67,594.05		

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B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
12/03/24	S. Schrag	0.30	288.90	B120	Review materials related to Global Notes re Schedules of Assets and Liabilities.
	Subtotal	0.30	288.90		

B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	T. Moyron	0.10	98.55	B150	Email re status of negotiations with DOJ over payment suspension with D. Lemke, counsel for biologic vendor.
	Subtotal	0.10	98.55		

B160 - Fee Applications/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
12/01/24	J.A. Moe, II	1.60	1,447.20	B160	In regard to the Monthly Fee Statement, exchange E-Mails with K. Howard on preparation of the Charts for the Monthly Fee Statement (.10); review and make changes to the Statement (.40); telephone call from K. Howard on completion of the calculations in regard to the Charts attached to and information contained in the Statement (.20); review of the calculations in the Charts included in and attached to the Statement (.60); telephone call to K. Howard on transferring calculations to updated Statement (.20); review the new Statement with Charts (.10).
12/01/24	K.M. Howard	3.80	1,487.70	B160	Review billings statements for October and November 1994 including preparation of Monthly Fee Application for the applicable billing period (3.7); prepare email to J. Moe regarding same (.1).
12/02/24	S. Ruben	0.20	150.30	B160	Revise supplement to Ankura retention application (.1); correspond with T. Moyron and S. Maizel re the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	J.A. Moe, II	0.60	542.70	B160	Complete fee statement revisions (.30); text message and telephone call to C. Doherty on review and approval of the latest version of the Monthly Fee Statement (.10); telephone call from C. Doherty on steps to review and file the Monthly Fee Statement and second telephone call with Mr. Doherty on the Statement (.20).
12/02/24	J.A. Moe, II	1.20	1,085.40	B160	Telephone calls with K. Howard on revising the Monthly Fee Statement to reflect the amount due Dentons and categorization of specific fees charged in the write-offs (.80); review Monthly Fee Statements and revise Chart to identify eighty percent of fees requested paid (.10); with K. Howard, make one addition to Chart to confirm the fees being requested paid at eighty percent, and review the final version of the Monthly Fee Statement (.30).
12/02/24	J.A. Moe, II	3.40	3,075.30	B160	In regard to the Monthly Fee Statement, exchange multiple E-Mails with T. Moyron, S. Maizel, K. Howard and G. Medina, on contents of and changes to the Monthly Fee Statement, and the consideration of and decision on Invoices, and authority to proceed to with revisions/updates to the Monthly Fee Statement and the Charts, and make further revisions and review and incorporate further revisions form Ms. Moyron and Ms. Howard.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	K.M. Howard	3.30	1,291.95	B160	Conferences with J. Moe regarding the completion of monthly fee application for the period of 10/21/24 - 11/25/24 (.6); analysis of emails from GWC Team regarding possible additional fee reductions (.1); review emails from S. Maizel regarding additional fee reductions (.1); review and revise monthly fee application (1.9); review final fee application (.1); prepare email to G. Medina regarding same (.1); telephone conference with G. Medina regarding fees requested (.1); review email from G. Medina regarding event code for fee application (.1); place telephone call to T. Moyron regarding the deadline to file the monthly fee application (.1); telephone conferences with J. Moe (x2) regarding filing deadline per Knudsen Motion (.1).
12/02/24	T. Moyron	0.80	788.40	B160	Review first monthly fee application (.3); review and respond to emails re revisions to same (.3); email to R. Cetrulo, et al., re same (.2).
12/02/24	S. Maizel	0.80	900.00	B160	Review first monthly fee application (.3); review and respond to emails re revisions to same (.3); email to R. Cetrulo, etc. re same (.2).
12/02/24	G. Medina	1.10	460.35	B160	Correspond with K. Howard and prepare first monthly fee application for filing (0.4); correspond and call with K. Howard regarding fee application (0.2); correspond and call with J. Moe regarding fee application (0.2); file first monthly fee application 0.3).
12/03/24	J.A. Moe, II	0.30	271.35	B160	Telephone call from C. Doherty on filing a Certificate Of Non-Opposition in regard to a Monthly Fee Statement (.10); second telephone call from C. Doherty on standard procedures in the Bankruptcy Court on Monthly Fee Statements and referral to the Knudsen Motion (.10); review the Knudsen Motion on terms (.10).
12/05/24	R. Garms	1.50	1,032.75	B160	Review CRO engagement documentation and revise written consent (1.3); e-mails regarding same (0.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/24	S. Ruben	0.20	150.30	B160	Correspond with T. Moyron re supplement to Ankura retention application (.1); revise the same (.1).
12/05/24	T. Moyron	0.50	492.75	B160	Attention to CRO appointment and documents (.3) and emails with S. Ruben, et al., re same (.2).
12/06/24	S. Ruben	0.10	75.15	B160	Correspond with I. Lee and A. Wagner re CRO engagement letter.
12/06/24	T. Moyron	0.70	689.85	B160	Attention to updated Ankura documents and CRO appointment (.4); correspond with I. Lee, et al., re same (.3).
12/07/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron re CRO engagement letter.
12/08/24	C. Doherty, Jr.	0.50	443.25	B160	Provide analysis concerning Ankura Supplemental Application and local practice regarding same.
12/08/24	S. Ruben	1.60	1,202.40	B160	Correspond with T. Moyron re supplement to Ankura retention application (.1); revise the same (1.3); conference with C. Doherty re filing (.1).
12/10/24	T. Moyron	0.20	197.10	B160	Call with UST re supplement re CRO and procedure (.1); correspond with S. Ruben, et al., regarding emergency motion (.1).
12/10/24	S. Ruben	0.20	150.30	B160	Correspond with T. Moyron and C. Doherty re CNO to Ankura retention application (.1); review emergency motion to supplement Ankura retention application (.1).
12/10/24	S. Maizel	1.50	1,687.50	B160	Review and revise emergency motion re appointment of a CRO.
12/10/24	C. Doherty, Jr.	1.80	1,595.70	B160	Prepare emergency motion for Ankura CRO application.
12/11/24	C. Doherty, Jr.	2.90	2,570.85	B160	Prepare CRO motion and prepare for filing of document.
12/11/24	S. Maizel	1.00	1,125.00	B160	Review and revise motion re appointment of CRO (.8); review and respond to emails re same (.2).
12/11/24	T. Moyron	1.60	1,576.80	B160	Analyze and prepare emergency motion re CRO.

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12/11/24	S. Ruben	2.30	1,728.45	B160	Correspond with T. Moyron and C. Doherty re emergency motion to supplement retention application (.1); revise the same (1.6); conference with C. Doherty re emergency motion (.2); prepare emergency motion for filing (.4).
12/11/24	G. Medina	0.90	376.65	B160	Review proposed order granting application to employ Ankura consulting and revise per the request of S. Ruben (0.4); coordinate with I. Ortiz regarding redlines of proposed orders (0.2); review redline received and send to C. Doherty (0.2); call with C. Doherty regarding status of filing (0.1).
12/12/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and C. Doherty re emergency motion to supplement retention application.
12/13/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and C. Doherty re emergency motion to supplement Ankura retention application.
12/13/24	C. Doherty, Jr.	0.10	88.65	B160	Provide analysis concerning local rules and CRO motion.
12/16/24	C. Doherty, Jr.	0.10	88.65	B160	Provide analysis concerning local rules and CRO motion.
12/16/24	G. Medina	0.20	83.70	B160	Correspond with C. Doherty and send redline as Exhibit B to CRO Emergency Motion.
12/16/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron and C. Doherty re emergency motion to supplement retention application.
12/16/24	G. Miller	0.30	267.30	B160	Further prepare OCP motion.
12/16/24	J.A. Moe, II	0.20	180.90	B160	Review the status of any Objection to the Monthly Fee Statement, then telephone call to C. Doherty confirming no Objection filed and requesting payment on December 17th.
12/16/24	J.A. Moe, II	0.30	271.35	B160	Commence work on preparation of the Second Monthly Fee Statement (and preliminarily consider requirements for the First Interim Application).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/17/24	J.A. Moe, II	0.20	180.90	B160	Review the status of any Objection to the First Monthly Fee Statement as of December 17th and exchange E-Mails with C. Doherty and T. Moyron on proceeding with payment.
12/17/24	J.A. Moe, II	0.90	814.05	B160	Review the Knudsen Motion requirements for the Monthly Fee Statements (.10); prepare formatted draft of Second Monthly Fee Statement (.60); review the draft of the Monthly Fee Statement, then forward to K. Howard (.20).
12/17/24	J.A. Moe, II	1.50	1,356.75	B160	Review the Knudsen Motion requirements for the First Interim Application (.10); review form and contents of Interim Applications (.20); prepare formatted draft of Dentons' First Interim Application (.40); commence review and significant editing of pages 1 through 8 of the First Interim Application (.80).
12/17/24	G. Miller	0.10	89.10	B160	Emails with S. Maizel and T. Moyron re OCP motion.
12/18/24	J.A. Moe, II	1.00	904.50	B160	Review the Knudsen Motion requirements for the First Interim Fee Application (.10); continue to significantly edit the first draft of the First Interim Fee Application (.90).
12/19/24	G. Miller	0.30	267.30	B160	Emails with A. Curtis, T. Moyron, and G. Medina re CRO motion.
12/19/24	G. Miller	0.50	445.50	B160	Further prepare OCP motion.
12/19/24	S. Ruben	0.10	75.15	B160	Correspond with T. Moyron, G. Miller and G. Medina re emergency motion to supplement retention application.
12/19/24	S. Maizel	0.50	562.50	B160	Zoom conference with T. Moyron and G. Miller re OCP motion.
12/19/24	G. Medina	0.80	334.80	B160	Review request from T. Moyron and send proposed order granting application to employ Ankura (0.2); prepare for filing emergency motion to employ Ankura and provide CRO and send to G. Miller, T. Moyron, C. Doherty, S. Maizel and S. Ruben for review (0.3); call with T. Moyron related to Ankura filing (0.1); file emergency motion with the court (0.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/19/24	T. Moyron	1.10	1,084.05	B160	Attention to issues related to motion to seal and various filings (.6); correspondence and emails with G. Miller, C. Doherty regarding same (.5).
12/20/24	C. Doherty, Jr.	0.10	88.65	B160	Review and respond to emails concerning CRO Motion.
12/23/24	C. Doherty, Jr.	0.20	177.30	B160	Review and respond to emails concerning CRO Motion.
12/23/24	G. Miller	0.10	89.10	B160	Email T. Moyron re OCP motion.
12/23/24	G. Medina	0.20	83.70	B160	Correspond with T. Moyron and C. Dougherty and send Lee declaration attached to Ankura declaration.
12/23/24	T. Moyron	0.30	295.65	B160	Correspond with C. Doherty, et al. re declaration re emergency CRO motion.
12/24/24	T. Moyron	0.30	295.65	B160	Review and respond to emails re CRO motion.
12/24/24	S. Maizel	0.30	337.50	B160	Review and respond to emails re CRO motion.
12/27/24	C. Doherty, Jr.	0.20	177.30	B160	Call with T. Moyron regarding CRO motion procedure and review local rules in connection with same.
	Subtotal	44.90	35,536.05		

B190 - Other Contested Matters (excluding Assumption/Rejection Moti

Date	Timekeeper	Hours	Amount	Task	Narrative
12/30/24	T. Moyron	0.60	591.30	B190	Exchange emails R. Millien re Wound Pros proposed agreement (.1); call with R. Millien and S. Maizel re same (.4); call with S. Maizel re same (.1).
	Subtotal	0.60	591.30		

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B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
12/23/24	S. Maizel	1.00	1,125.00	B210	Zoom call with HLB attorneys, R. Cetrulo, K. Manning, K. Greer, T. Moyron, etc. re possible restructuring of business operations proposals (.8); telephone conference with T. Moyron re same (.2).
	Subtotal	1.00	1,125.00		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/24	S. Maizel	0.30	337.50	B310	Review and respond to emails re motion to set a bar date.
12/14/24	S. Schrag	0.10	96.30	B310	Confer with T. Moyron regarding Bar Date Motion.
12/16/24	S. Schrag	0.10	96.30	B310	Confer with T. Moyron regarding Bar Date Motion.
12/19/24	S. Schrag	1.50	1,444.50	B310	Prepare bar date motion.
12/20/24	S. Schrag	1.70	1,637.10	B310	Prepare Bar Date Motion.
12/20/24	T. Moyron	0.30	295.65	B310	Attention to bar date motion and related emails with S. Schrag, et al.
12/21/24	S. Schrag	4.60	4,429.80	B310	Continue preparing bar date motion.
12/24/24	S. Schrag	2.30	2,214.90	B310	Further prepare bar date motion.
12/26/24	S. Schrag	4.80	4,622.40	B310	Further prepare bar date motion (1.3); further prepare bar date order (.7); further prepare bar date notices (2.8).
	Subtotal	15.70	15,174.45		

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EMP - Employment

Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	T. Moyron	0.30	295.65	EMP	Review succession agreement and Ellington Employment Agreement in preparation for call with HLB, et al.
12/03/24	T. Moyron	1.00	985.50	EMP	Review succession agreement and employment agreement re Dr. Ellington (.3); zoom conference with HLB attorneys, R. Cetrulo, et al., re Dr. Ellington employment agreement (.6); conference with K. Manning re same (.1).
12/03/24	S. Maizel	1.00	1,125.00	EMP	Review succession agreement and employment agreement re Dr. Ellington (.3); zoom conference with HLB attorneys, R. Cetrulo, etc. re Dr. Ellington employment issues (.6); telephone conference with K. Manning re same (.1).
12/12/24	S. McCandless	1.40	1,455.30	EMP	Review communication from S. Maizel regarding status of certain service providers as contractors or employees and related legal implications (.20); review attached legal information (.20); respond to same (.30); research for any employment exemption related to wound care (.50); further communications with T. Moyron and S. Maizel (.20).
12/13/24	S. McCandless	0.20	207.90	EMP	Discuss employee/contractor issue with T. Moyron.
	Subtotal	3.90	4,069.35		

MED/CMS- Medicare/CMS Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	T. Moyron	1.80	1,773.90	MED/CMS	Zoom conference with A. Curtis, A. Warner and S. Maizel re CMS Stipulation re payment suspension (1.1); multiple telephone conferences with S. Maizel re same (.2); draft email to Dr. Releford, et al., re conference with DOJ attorneys (.5).
12/02/24	T. Moyron	0.20	197.10	MED/CMS	Telephone conference with S. Maizel re pending issues with CMS.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/02/24	S. Maizel	1.80	2,025.00	MED/CMS	Zoom conference with A. Curtis, A. Warner, and T. Moyron re CMS Stipulation re payment suspension (1.1); multiple telephone conference with T. Moyron re same (.2); drafting email to Dr. Releford, etc. re conference with DOJ attorneys. (.5).
12/02/24	S. Maizel	0.30	337.50	MED/CMS	Review succession agreement and Ellington Employment Agreement in preparation for call with HLB, etc.
12/02/24	S. Schrag	0.10	96.30	MED/CMS	Confer with T. Moyron regarding stipulation with CMS.
12/02/24	S. Maizel	0.20	225.00	MED/CMS	Telephone conference with T. Moyron re pending issues with CMS.
12/02/24	S. Maizel	0.10	112.50	MED/CMS	Telephone conference with T. Moyron re pending issues with CMS.
12/04/24	T. Moyron	0.90	886.95	MED/CMS	Review of presentation for DOJ re pending issues with HLB, Dr. Releford, et al.
12/04/24	T. Moyron	2.20	2,168.10	MED/CMS	Zoom conference with DOJ re stipulation to resolve payment suspension (.9); zoom with R. Cetrulo, K. Manning, Ankura, et al., re stipulation to resolve payment suspension (.7); call with S. Maizel re same (.2); review and respond to emails re same (.4).
12/04/24	T. Moyron	0.10	98.55	MED/CMS	Correspondence with A. Curtis re timing of stipulation.
12/04/24	S. Maizel	2.20	2,475.00	MED/CMS	Zoom conference with DOJ re stipulation to resolve payment suspension (.9); zoom with R. Cetrulo, K. Manning, Ankura, etc. re stipulation to resolve payment suspension (.7); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.4).
12/05/24	S. Maizel	1.20	1,350.00	MED/CMS	Zoom conference with HLB attorneys, DOJ Fraud attorneys, etc. re biologics fees issues.
12/05/24	S. Maizel	0.50	562.50	MED/CMS	Zoom conference with R. Cetrulo, K. Greer, K. Manning, etc. re payment suspension related issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/05/24	S. Maizel	1.20	1,350.00	MED/CMS	Emails to A. Curtis and A. Warner, DOJ, re budget, operating needs, etc. for stipulation resolving payment suspension (1.0); telephone conference with T. Moyron re same (.2).
12/05/24	T. Moyron	0.50	492.75	MED/CMS	Calls with S. Maizel (.3) and I. Lee (.2) re pending CMS matters and next steps.
12/05/24	T. Moyron	0.30	295.65	MED/CMS	Analyze email from A. Warner re requested materials and stipulation (.1); prepare emails to A. Warner re same (.1); follow up S. Maizel, et al., and related emails (.1).
12/05/24	T. Moyron	1.70	1,675.35	MED/CMS	Correspondence with Ankura, R. Cetrulo, et al., regarding vendor contract, budget, and other matters related to DOJ requests (.8); analyze related material including vendor contract (.9).
12/05/24	T. Moyron	0.70	689.85	MED/CMS	Call with HLB, including C. Oppenheim, DOJ civil fraud lawyers, etc. regarding various issues (.5); correspond with A. Warner, et al., regarding requested materials and timing and stipulation (.2).
12/05/24	T. Moyron	2.20	2,168.10	MED/CMS	Further attention to CRO documents (.5) and correspond with M. Garms, et al., re resolution and documents re CRO (.4); analyze budget and related documents, including vendor contracts re stipulation (1.3).
12/06/24	T. Moyron	0.30	295.65	MED/CMS	Email to HLB attorneys re draft of potential settlement agreement with DOJ and CMS re FCA investigation.
12/06/24	S. Maizel	2.80	3,150.00	MED/CMS	Telephone conference with I. Lee re proposed stipulation with CMS to resolve payment suspension (.1); multiple telephone conference with T. Moyron re same (.7); multiple telephone conferences with A. Curtis, DOJ, re same (.9); telephone conference with R. Cetrulo re same (.1); review draft stipulation from DOJ (.5); review and respond to emails re same (.5).
12/06/24	T. Moyron	1.80	1,773.90	MED/CMS	Calls with S. Maizel re stipulation (.7); review draft stipulation from DOJ (.6); review and respond to emails re same (.5).

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12/06/24	T. Moyron	1.50	1,478.25	MED/CMS	Zoom conference with Dr. Releford, HLB attorneys, et al., re pending issues with CMS over payment suspension (.9); analyze PowerPoint for presentation to DOJ attorneys (.6).
12/06/24	T. Moyron	0.70	689.85	MED/CMS	Analyze email from A. Curtis re updated DOJ stipulation (.1); analyze DOJ stipulation (.2); call with R. Cetrulo re liquidity and updated DOJ stipulation (.2); prepare email to A. Curtis re liquidity and updated DOJ stipulation (.1); prepare email to A. Curtis attaching vendor contract (.1).
12/06/24	S. Maizel	1.10	1,237.50	MED/CMS	Zoom conference with Dr. Releford, HLB attorneys, etc. re pending issues with CMS over payment suspension (.9); review powerpoint for presentation to DOJ attorneys and email comments on same to HLB (.2).
12/06/24	S. Maizel	0.30	337.50	MED/CMS	Email to HLB attorneys re draft of potential settlement agreement with DOJ and CMS re FCA investigation.
12/07/24	S. Maizel	4.30	4,837.50	MED/CMS	Review and comment on DOJ draft of stipulation to resolve the payment suspension (1.0); zoom conference with A. Curtis and A. Warner, DOJ, and T. Moyron re stipulation to resolve the payment suspension (1.1); telephone conference with I. Lee re same (.1); telephone conference with T. Moyron re same (.1); revising stipulation per discussions (2.0).
12/07/24	S. Maizel	0.50	562.50	MED/CMS	Review draft powerpoint presentation for DOJ from HLB attorneys (.4); email to D. Schumacher, HLB, re same (.1).
12/08/24	S. Maizel	4.00	4,500.00	MED/CMS	Zoom conference with T. Moyron re stipulation with DOJ re payment suspension (.5); zoom conference with R. Cetrulo, I. Lee, and T. Moyron re same (1.2); multiple telephone conference with I. Lee re same (.3); multiple telephone conference with T. Moyron re same (.2); revising stipulation with DOJ re payment suspension (1.7); email to DOJ with proposed revisions to draft of stipulation (.1).

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12/08/24	S. Maizel	2.00	2,250.00	MED/CMS	Zoom conference with HLB attorneys, Dr. Releford, R. Cetrulo, K. Manning, K. Greer, T. Moyron, I. Lee re presentation to DOJ attorneys on various issues related to the payment suspension (1.4); telephone conference with T. Moyron re same (.3); emails to HLB attorneys re same (.3).
12/08/24	T. Moyron	1.70	1,675.35	MED/CMS	Meeting with HLB, clients, S. Maizel, et al., regarding materials for DOJ meeting (1.4); call with S. Maizel re same (.3).
12/08/24	T. Moyron	1.20	1,182.60	MED/CMS	Zoom meeting with clients, including Dr. Releford, S. Maizel, Ankura re stipulation and updated language and changes.
12/08/24	T. Moyron	0.80	788.40	MED/CMS	Analyze and prepare supplement re CRO (.4); correspond with S. Ruben and C. Doherty re supplement and matters related to filing (.4).
12/08/24	T. Moyron	3.20	3,153.60	MED/CMS	Analyze and prepare comments to stipulation and redline (1.4); zoom with S. Maizel regarding stipulation and changes (.5); exchange emails with S. Maizel re stipulation (.3); exchange emails with I. Lee re stipulation (.1); analyze stipulation further updated after client and Ankura call, prepare comments to same and create redline (.9).
12/09/24	T. Moyron	0.50	492.75	MED/CMS	Call with C. Wicker regarding DOJ presentation and related matters and upcoming matters.
12/09/24	T. Moyron	1.00	985.50	MED/CMS	Meeting with DOJ (J. Bergin, et al.), HLB (D. Shumacher, et al.), re incident to and enrollment.
12/09/24	S. Maizel	1.20	1,350.00	MED/CMS	Attend HLB meeting with DOJ re pending issues related to "incident to" issues, etc. (1.0); telephone conference with T. Moyron re same (.2).
12/09/24	S. Maizel	0.50	562.50	MED/CMS	Email to A. Curtis, DOJ, etc. re revisions in draft stipulation to resolve the payment suspension.
12/10/24	S. Maizel	1.30	1,462.50	MED/CMS	Zoom conference with A. Curtis and A. Warner, DOJ; R. Cetrulo, I. Lee, and T. Moyron re stipulation to resolve the payment suspension.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/10/24	S. Maizel	3.60	4,050.00	MED/CMS	Zoom conference with L. Hill, A. Warner, A. Curtis, etc., DOJ attorneys; HLB attorneys; and T. Moyron re FCA investigation settlement issues (1.3); zoom conference with HLB attorneys and T. Moyron re DOJ FCA investigation settlement issues (.9); multiple telephone conference with T. Moyron re same (.2); zoom conference with R. Cetrulo, Dr. Releford, HLB attorneys, etc. re negotiations with DOJ Fraud over FCA investigation settlement (1.0); telephone conference with T. Moyron re same (.2).
12/10/24	T. Moyron	0.70	689.85	MED/CMS	Analyze email from T. Tran re budget (.1); analyze 4-week budget and excel (.2); prepare email to A. Curtis re budget (.1); analyze email from D. Schumacher re limited waiver re attorney-client privilege (.1); analyze emails from D. Schumacher re settlement (.2).
12/10/24	T. Moyron	1.30	1,281.15	MED/CMS	Teams meeting with DOJ (L. Hill, et al.), HLB (C. Wicker, et al.), and S. Maizel re DOJ presentation.
12/10/24	T. Moyron	1.40	1,379.70	MED/CMS	Teams meeting with HLB and S. Maizel re follow up to DOJ meeting (.9); call with I. Lee re DOJ meeting (.5).
12/10/24	T. Moyron	1.20	1,182.60	MED/CMS	Call with clients, including Dr. Releford, et al., HLB, S. Maizel, et al., regarding call with DOJ (1.0); follow up call with S. Maizel (.2).
12/11/24	T. Moyron	2.60	2,562.30	MED/CMS	Call with A. Curtis, A. Wagner, and S. Maizel regarding most recent draft stipulation received by DOJ, proposed changes thereto, and related matters.
12/11/24	S. Maizel	0.10	112.50	MED/CMS	Telephone conference with T. Moyron re negotiations over FCA settlement.
12/11/24	S. Maizel	3.90	4,387.50	MED/CMS	Review and respond to emails re stipulation with DOJ to resolve the payment suspension (.4); review revised stipulation re payment suspension from DOJ (.5); zoom conference with A. Curtis, A. Warner, I. Lee, R. Cetrulo, and T. Moyron re same (2.6); multiple telephone conferences with T. Moyron re same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/11/24	T. Moyron	1.30	1,281.15	MED/CMS	Calls with S. Maizel re updated stipulation (.4); analyze updated stipulation and redline (.5); correspond regarding same (.4).
12/11/24	T. Moyron	0.40	394.20	MED/CMS	Correspondence from 180 Health for DOJ (.2) and review letter (.1); prepare email to A. Curtis, et al., re 180 letter (.1).
12/11/24	S. Maizel	0.20	225.00	MED/CMS	Review and respond to emails re correspondence from 180 Health for DOJ.
12/12/24	S. Maizel	1.00	1,125.00	MED/CMS	Zoom with HLB attorneys, R. Cetrulo, K. Manning, K. Greer, I. Lee, etc. re DOJ settlement negotiations over FCA investigation (.5); telephone conference with T. Moyron re same (.2); telephone conference with C. Schumacher, HLB, re same (.3).
12/12/24	S. Maizel	0.40	450.00	MED/CMS	Telephone conference with A. Curtis and T. Moyron re negotiations over stipulation to resolve payment suspension (.2); telephone conference with T. Moyron re same (.2).
12/12/24	S. Maizel	0.30	337.50	MED/CMS	Emails re AKS issues related to employee status re FCA investigation.
12/12/24	T. Moyron	0.40	394.20	MED/CMS	Analyze further HLB documents re employees/independent contractors.
12/12/24	T. Moyron	0.20	197.10	MED/CMS	Email to I. Lee re stipulation. (.1); analyze email from I. Lee re billing submissions (.1).
12/12/24	T. Moyron	0.20	197.10	MED/CMS	Correspondence with D. Schumacher re settlement.
12/12/24	T. Moyron	1.00	985.50	MED/CMS	Zoom with HLB attorneys, R. Cetrulo, K. Manning, K. Greer, I. Lee, et al., re DOJ settlement negotiations over FCA investigation (.5); telephone conference with S. Maizel re same (.2); telephone conference with C. Schumacher, HLB, re same (.3).
12/12/24	T. Moyron	0.40	394.20	MED/CMS	Conference with A. Curtis and S. Maizel re negotiations over stipulation to resolve payment suspension (.2); telephone conference with S. Maizel re same (.2).
12/12/24	T. Moyron	0.30	295.65	MED/CMS	Analyze emails re issues related to employee status re FCA investigation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/13/24	S. Maizel	1.60	1,800.00	MED/CMS	Zoom conference with DOJ and HLB attorneys re FCA investigation and settlement proposal (.6); zoom conference with Dr. Releford, K. Manning, R. Cetrulo, HLB attorneys, etc. re same (.6); telephone conference with T. Moyron re same (.2); review and respond to emails re same (.2).
12/13/24	T. Moyron	0.30	295.65	MED/CMS	Analyze emails from K. Greer, et al., re biologic figures (.2); analyze email from D. Schumacher re additional information requested (.1).
12/13/24	T. Moyron	0.60	591.30	MED/CMS	Call with I. Lee regarding meeting with DOJ (.1); call with A. Warner and I. Lee re status of stipulation and next steps (.3); call with I. Lee thereafter re same (.1); prepare email to client R. Cetrulo, et al., re summary of call with A. Warner (.1).
12/13/24	T. Moyron	0.10	98.55	MED/CMS	Prepare email to L. Hill, et al., re timing of delivery of materials re offer.
12/13/24	T. Moyron	0.20	197.10	MED/CMS	Analyze email from D. Schumacher re DOJ requested materials (.1); analyze email from K. Greer regarding detail re same (.1).
12/13/24	T. Moyron	1.10	1,084.05	MED/CMS	Analyze settlement offer, calculations and related materials (.7); and related emails from D. Schumacher, et al. re same (.4).
12/13/24	T. Moyron	1.20	1,182.60	MED/CMS	Meeting with DOJ, HLB, S. Maizel, et al., re settlement offer (.7); call with clients (R. Cetrulo, K. Manning), HLB, K. Greer, et al., re de-brief on meeting with DOJ, materials requested, and next steps (.5).
12/13/24	T. Moyron	1.60	1,576.80	MED/CMS	Analyze law and related materials re employees/independent contractors (.8); calls with S. McCandless re labor matters re settlement (.2); calls with D. Schumacher (.1), R. Cetrulo (.1), S. Maizel (.1) regarding same; analyze settlement offer and calculations (.2); correspond with D. Schumacher re same (.1).

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12/16/24	T. Moyron	1.80	1,773.90	MED/CMS	Zoom conference with R. Cetrulo, K. Manning, Dr. Releford, HLB attorneys, Ankura, etc. re negotiations with DOJ and CMS over FCA investigation (.7); analyze correspondence from C. Oppenheim re same (.2); attention to materials related to back-up and related matters (.7); analyze correspondence from D. Schumacher (.2).
12/16/24	T. Moyron	0.40	394.20	MED/CMS	Multiple telephone conferences with S. Maizel re stipulation with DOJ to resolve payment suspension (.3); review and respond to emails re same (.1).
12/16/24	S. Maizel	0.90	1,012.50	MED/CMS	Zoom conference with R. Cetrulo, K. Manning, Dr. Releford, HLB attorneys, Ankura, etc. re negotiations with DOJ and CMS over FCA investigation (.7); review and respond to emails from C. Oppenheim re same (.2).
12/16/24	S. Maizel	0.40	450.00	MED/CMS	Multiple telephone conference with T. Moyron re stipulation with DOJ to resolve payment suspension (.3); review and respond to emails re same (.1).
12/17/24	T. Moyron	1.20	1,182.60	MED/CMS	Zoom meeting with D. Schumacher, GWC, et al., re DOJ investigation and settlement (.5); calls with S. Maizel re same (.7).
12/17/24	T. Moyron	3.20	3,153.60	MED/CMS	Zoom meeting with DOJ bankruptcy lawyers re stipulation (.3); correspondence with DOJ Bankruptcy lawyers re stipulation (.7); analyze redlines and proposed final term of stipulation (2.2).
12/17/24	T. Moyron	1.40	1,379.70	MED/CMS	Analyze updated complaint and redline (.8); correspondence regarding complaint and motion (.6).
12/17/24	S. Maizel	1.20	1,350.00	MED/CMS	Zoom conference with HLB attorneys, Dr. Releford, etc. re negotiations with DOJ over FCA investigation (.5); multiple telephone conference with T. Moyron re same (.7).
12/17/24	S. Maizel	2.30	2,587.50	MED/CMS	Zoom conference with A. Curtis, etc. re stipulation over payment suspension (.3); review and respond to emails re stipulation re payment suspension (1.0); revising stipulation re payment suspension (1.0).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/17/24	S. Maizel	2.80	3,150.00	MED/CMS	Revising complaint re CMS suspension of payments (1.0); revising emergency motion re same (1.8).
12/17/24	D. Cook	4.70	4,018.50	MED/CMS	Prepare complaint for declaratory judgment and injunctive relief concerning Payment Suspension (4.2); email correspondence with T. Moyron and S. Maizel concerning same (.1); email correspondence with Dentons team and I. Lee and team concerning same (.1); analyze S. Maizel comments to injunctive relief motion (.3).
12/17/24	C. Doherty, Jr.	0.20	177.30	MED/CMS	Review revised draft of CMS complaint for adversary proceeding.
12/17/24	C. Doherty, Jr.	0.50	443.25	MED/CMS	Prepare and finalize government stipulation.
12/17/24	S. Ruben	0.10	75.15	MED/CMS	Correspond with T. Moyron re status of adversary complaint.
12/17/24	S. Cenawood	0.30	359.10	MED/CMS	Attention to latest drafts of complaint and TRO/PI motion for potential filing in event discussions with government break down.
12/18/24	T. Moyron	0.50	492.75	MED/CMS	Zoom call with R. Cetrulo, K. Manning, I. Lee, K. Greer, S. Maizel, etc. re pending issues (.4); review and respond to emails regarding same (.1).
12/18/24	T. Moyron	2.00	1,971.00	MED/CMS	Multiple calls with S. Maizel re stipulation with CMS re payment suspension (.7); zoom conference with R. Cetrulo, I. Lee, etc. re budget for stipulation with CMS re payment suspension (.8); review and respond to emails re same (.5).
12/18/24	T. Moyron	1.80	1,773.90	MED/CMS	Zoom meeting with DOJ attorneys (J. Bergin, et al.), HLB attorneys (C. Wicker, et al.), etc. regarding FCA investigation and settlement discussions (.9); zoom meeting with HLB attorneys, R. Cetrulo, K. Manning, K. Greer, I. Lee, etc. re background for DOJ re FCA settlement discussions (.6); review and respond to emails re same (.3).
12/18/24	T. Moyron	2.60	2,562.30	MED/CMS	Correspond with A. Curtis, et al., re Stipulation, Exhibits A and B and finalization of same (.5); correspond with GWC and Ankura re same (.7); and final review and finalize for filing (1.4).

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12/18/24	T. Moyron	0.60	591.30	MED/CMS	Correspond with S. Maizel regarding complaint (.2); analyze proposed changes and complaint (.4).
12/18/24	T. Moyron	0.10	98.55	MED/CMS	Analyze email from A. Curtis re timing of stipulation and forward to GWC.
12/18/24	C. Doherty, Jr.	2.80	2,482.20	MED/CMS	Prepare emergency motion and provide analysis regarding same concerning sealing of documents in connection with Stipulation.
12/18/24	C. Doherty, Jr.	1.00	886.50	MED/CMS	Prepare and provide analysis concerning finalization of and filing of government stipulation.
12/18/24	G. Medina	0.40	167.40	MED/CMS	Received and prepare for filing stipulation regarding suspension of medicare payments and send to T. Moyron, A. Curtis, A. Warner, S. Maizel and C. Doherty for review.
12/18/24	D. Cook	4.10	3,505.50	MED/CMS	Prepare motion for injunctive relief to incorporate comments received from S. Maizel and to conform to revised corresponding complaint.
12/18/24	S. Maizel	2.00	2,250.00	MED/CMS	Multiple telephone conference with T. Moyron re stipulation with CMS re payment suspension (.7); zoom conference with R. Cetrulo, I. Lee, etc. re budget for stipulation with CMS re payment suspension (.8); review and respond to emails re same (.5).
12/18/24	S. Maizel	1.80	2,025.00	MED/CMS	Zoom conference with DOJ attorneys, HLB attorneys, etc. re FCA investigation and settlement discussions (.9); zoom conference with HLB attorneys, R. Cetrulo, K. Manning, K. Greer, I. Lee, etc. re background for DOJ re FCA settlement discussions (.6); review and respond to emails re same (.3).
12/19/24	S. Schrag	0.80	770.40	MED/CMS	Conference call with G. Miller, T. Moyron, and S. Maizel regarding CMS stipulation and related matters.
12/19/24	S. Schrag	1.60	1,540.80	MED/CMS	Prepare memorandum for client regarding CMS stipulation.

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12/19/24	T. Moyron	0.30	295.65	MED/CMS	Call with A. Curtis re motion to seal (.1); call with S. Maizel (.1) and call with S. Maizel and A. Curtis re Medicare Receivables Accounts and mechanics related thereto (.1).
12/19/24	T. Moyron	0.40	394.20	MED/CMS	Analyze email from I. Lee regarding requirements and prohibitions under stipulation (.2); and prepare email to I. Lee regarding same and review stipulation in connection therewith (.2).
12/19/24	T. Moyron	0.80	788.40	MED/CMS	Analyze emails from D. Schumaker, et al., regarding materials for DOJ (.4); Teams meeting with DOJ lawyers (L., Hill, et al.), HLB, etc. (.4).
12/19/24	T. Moyron	4.90	4,828.95	MED/CMS	Call with C. Doherty re timing of stipulation and related matters (.3); analyze email from A. Curtis re authorization to file stipulation (.1); analyze final version of stipulation and related documents (.4); zoom meeting with S. Maizel, C. Doherty and G. Miller re finalization of stipulation for filing, motion to seal and related matters (1.0); attention to emails and final versions of motion to seal, CRO motion, and related exhibits (1.3); zoom meeting with S. Maizel, S. Schrag, et al., regarding CRO motion, client inquiry as to stipulation and related matters (1.2); analyze stipulation and exhibit in connection with client inquiry (.3); call with I. Lee re stipulation, call to discuss process and budget and other matters (.3).
12/19/24	G. Medina	0.40	167.40	MED/CMS	File stipulation between GWC and United States DOJ and send file stamped copy to T. Moyron, G. Miller and C. Doherty.
12/19/24	G. Medina	1.20	502.20	MED/CMS	Correspond with G. Miller regarding filing motion under seal (0.1); review procedures for sealing motion and exhibit (0.1); call with C. Doherty and G. Miller regarding motion and exhibit (0.2); file motion to seal exhibit and file sealed exhibit and send file copy to G. Miller and C. Doherty (0.4); call with G. Miller regarding filing and prepare and file amended motion to seal exhibit (0.4).

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12/19/24	G. Miller	1.70	1,514.70	MED/CMS	Further prepare motion to seal stipulation with DOJ (1); Calls and emails with C. Doherty and G. Medina re same (.4).
12/19/24	S. Maizel	3.00	3,375.00	MED/CMS	Zoom conference with T. Moyron, S. Schrag and G. Miller re preparation of documents related to stipulation to resolve the payment suspension, including CRO motion (1.2); zoom conference with I. Lee and T. Moyron re budget for stipulation with CMS re payment suspension (1.1); review and respond to emails re stipulation (.5); multiple telephone conference with T. Moyron re issues re the stipulation (.2).
12/19/24	G. Miller	0.20	178.20	MED/CMS	Emails with T. Moyron and C. Doherty re motion to seal exhibit to stipulation with DOJ.
12/19/24	G. Miller	1.70	1,514.70	MED/CMS	Call with T. Moyron and S. Maizel re stipulation with DOJ (1); further prepare motion to approve stipulation with DOJ (.7).
12/19/24	G. Miller	1.30	1,158.30	MED/CMS	Call with Sam, Tania and Sarah re CRO motion and motion to seal exhibit to stipulation with DOJ.
12/19/24	C. Doherty, Jr.	1.20	1,063.80	MED/CMS	Provide analysis concerning preparation and filing of government stipulation.
12/19/24	C. Doherty, Jr.	0.40	354.60	MED/CMS	Prepare emails and communicate with court case manager concerning stipulation and related filings.
12/19/24	C. Doherty, Jr.	0.60	531.90	MED/CMS	Provide analysis concerning finalization and filing of motion to seal and amended motion.
12/19/24	C. Doherty, Jr.	0.30	265.95	MED/CMS	Calls with G. Medina, G. Miller and T. Moyron regarding sealing motion.
12/19/24	T. Moyron	1.30	1,281.15	MED/CMS	Further attention to motion, stipulation and related matters.
12/20/24	T. Moyron	0.90	886.95	MED/CMS	Emails with A. Curtis, et al. regarding meeting (.2); meeting with A. Curtis, A. Warner, and S. Maizel re questions related to stipulation, budget, mechanics of disbursement and other matters (.7).

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12/20/24	T. Moyron	2.70	2,660.85	MED/CMS	Meeting with I. Lee, R. Cetrulo, et al., to further review provisions in stipulation and mechanics related to accounts, disbursements and other matters (1.5), and further meeting to discuss same (1.2).
12/20/24	T. Moyron	1.40	1,379.70	MED/CMS	Meeting with HLB, S. Maizel re pending DOJ matters (.3); call with I. Lee re stipulation (.2); call with S. Maizel re matters related to stipulation, etc. (.3); call with K. Manning regarding DOJ matters and restructuring of company (.6).
12/20/24	G. Medina	0.20	83.70	MED/CMS	E-mail per the request of T. Moyron, Ankura emergency motion and amended motion to file sealed exhibit.
12/20/24	S. Maizel	1.00	1,125.00	MED/CMS	Zoom conference with R. Cetrulo, I. Lee, etc. re DOJ budget issues (.5); review and respond to emails re budget issues (.5).
12/20/24	S. Maizel	0.70	787.50	MED/CMS	Zoom conference with DOJ attorneys, T. Moyron, etc., re FCA investigation issues.
12/20/24	S. Schrag	2.60	2,503.80	MED/CMS	Review correspondence from T. Moyron and I. Lee regarding CMS stipulation (.1); further prepare memorandum for client regarding the same (2.4); confer with T. Moyron regarding the same (.1).
12/20/24	T. Moyron	1.40	1,379.70	MED/CMS	Further attention to stipulation, inquiries related thereto, and other documents.
12/23/24	T. Moyron	0.20	197.10	MED/CMS	Call with I. Lee re CMS stipulation.
12/23/24	G. Miller	0.20	178.20	MED/CMS	Review correspondence re current updates with DOJ.
12/23/24	S. Maizel	0.70	787.50	MED/CMS	Telephone conference with T. Moyron re payment suspension issues (.2); review and respond to emails from R. Cetrulo, etc. re same (.5).
12/23/24	T. Moyron	1.90	1,872.45	MED/CMS	Daily huddle regarding DOJ matters and budget (.4); calls with S. Maizel re same (.3); call with HLB, R. Cetrulo, K. Greer, et al., regarding proposed corporate structure (1.0); correspond with I. Lee and R. Cetrulo re payments and budget (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/24/24	S. Maizel	0.50	562.50	MED/CMS	Review and respond to emails re CMS payment suspension (.4); telephone conference with T. Moyron re same (.1).
12/24/24	S. Maizel	0.80	900.00	MED/CMS	Review draft settlement agreement from HLB.
12/24/24	S. Maizel	0.50	562.50	MED/CMS	Review and respond to emails re cash on hand with regard to DOJ budget from stipulation re payment suspension.
12/24/24	T. Moyron	0.30	295.65	MED/CMS	Call with HLB, et al., re pending issues.
12/24/24	T. Moyron	0.50	492.75	MED/CMS	Review and respond to emails re CMS payment suspension (.4); telephone conference with S. Maizel re same (.1).
12/24/24	T. Moyron	0.80	788.40	MED/CMS	Review draft settlement agreement from HLB.
12/24/24	T. Moyron	0.50	492.75	MED/CMS	Review and respond to emails re cash-on-hand with regard to DOJ budget from stipulation re payment suspension.
12/26/24	S. Maizel	0.80	900.00	MED/CMS	Review and respond to emails re Medicare payment suspension.
12/26/24	S. Maizel	0.80	900.00	MED/CMS	Review emails 5-week budget for DOJ (.5); review emails re budget and disbursements thereon (.3).
12/26/24	T. Moyron	0.90	886.95	MED/CMS	Analyze emails regarding budget, shortfall and other issues from R. Cetrulo, T. Tran, et al. (.7); prepare email to A. Curtis, et al., re medicare receipts, budget, etc. (.1); prepare email to R. Cetrulo re same (.1).
12/27/24	T. Moyron	0.40	394.20	MED/CMS	Call with R. Cetrulo re budget, shortfall and suspense account, and related issues (.2); analyze budget (.2).
12/27/24	T. Moyron	0.20	197.10	MED/CMS	Call with S. Maizel re DOJ stipulation extension.
12/27/24	S. Maizel	0.50	562.50	MED/CMS	Telephone conference with T. Moyron re negotiations with DOJ over extension of stipulation re payment suspension (.2); review and respond to emails re same (.3).
12/27/24	S. Maizel	0.30	337.50	MED/CMS	Review and respond to emails re resumption of Medicare payments.
12/27/24	S. Maizel	0.50	562.50	MED/CMS	Review and respond to emails re budget issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/30/24	C. Doherty, Jr.	0.80	709.20	MED/CMS	Prepare notice of amended stipulation.
12/30/24	C. Doherty, Jr.	0.30	265.95	MED/CMS	Calls with T. Moyron regarding amended stipulation and related matters.
12/30/24	S. Maizel	0.40	450.00	MED/CMS	Review draft settlement agreement re FCA investigation from HLB.
12/30/24	S. Maizel	0.90	1,012.50	MED/CMS	Telephone conference with D. Schumacher and T. Moyron re DOJ information requests, etc. re FCA investigation (.2); telephone conference with T. Moyron re same (.5); review and respond to emails re same (.2).
12/30/24	S. Maizel	2.20	2,475.00	MED/CMS	Zoom with DOJ attorneys, HLB attorneys, etc. re negotiations over FCA issues (.6); telephone conference with HLB attorneys and T. Moyron, etc. (.3); zoom with Dr. Releford, R. Cetrulo, K. Manning, HLB attorneys, etc. re DOJ negotiations over FCA investigation (1.0); review and respond to emails re FCA negotiations (.3).
12/30/24	S. Maizel	1.30	1,462.50	MED/CMS	Zoom conference with A. Curtis, DOJ, and Ankura, and T. Moyron re payment suspension stipulation continuation issues (.8); telephone conference with R. Cetrulo and T. Moyron re same (.2); review and respond to emails re notice of extension (.3).
12/30/24	T. Moyron	2.00	1,971.00	MED/CMS	Call with R. Cetrulo re reimbursements, stipulation and related matters (.3); call with DOJ, D. Schumacher, et al. re inquiries and response from DOJ (.5); call with S. Maizel re same (.1); call with R. Cetrulo, Dr. Releford, HLB, et al., re same (1.0); analyze email from R. Cetrulo re calculations (.1).
12/30/24	T. Moyron	0.90	886.95	MED/CMS	Call with R. Cetrulo re same and proposed WCC disbursements (.3); analyze matters related to budget, stipulation and proposed disbursements (.4); emails from R. Cetrulo re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/30/24	T. Moyron	1.10	1,084.05	MED/CMS	Call with A. Curtis re payment inquiry and notice if stipulation extended (.1); call with A. Curtis, T. Tran, S. Maizel, et al., re January budget, notice (.8); call with S. Maizel and R. Cetrulo thereafter (.2).
12/30/24	T. Moyron	0.50	492.75	MED/CMS	Call with S. Maizel re FCA settlement and related matters.
12/30/24	T. Moyron	0.60	591.30	MED/CMS	Call with C. Doherty re background on discussions, stipulation and extension (.2); call with C. Doherty regarding contents of notice and exhibit (.3); prepare email to A. Curtis re draft notice re extension (.1).
12/30/24	T. Moyron	0.20	197.10	MED/CMS	Calls with M. Tran re call with DOJ bk lawyers and budget.
12/31/24	K.M. Howard	0.80	313.20	MED/CMS	Email exchanges with S. Maizel regarding the Joint Notice of Extension of Stipulation (.1); email exchanges with T. Moyron regarding same (.1); review the Joint Notice and exhibits thereto (.1); review email from C. Doherty regarding additional needed information (.1); prepare same for filing (.2); file Joint Notice of Stipulation with the USBC Southern District of Texas (.2).
12/31/24	S. Maizel	1.10	1,237.50	MED/CMS	Zoom conference with R. Millien, K. Manning, K. Greer, I. Lee, etc. re negotiations with DOJ over FCA investigation (1.0); telephone conference with T. Moyron re same (.1).
12/31/24	S. Maizel	1.30	1,462.50	MED/CMS	Zoom conference with A. Curtis, T. Moyron, Ankura, etc. re continuation of stipulation re payment suspension (.3); telephone conference with T. Moyron re notice of extension of stipulation re payment suspension (.1); telephone conference with K. Howard re same (.1); telephone conference with C. Doherty re same (.1); review and respond to emails re extension of stipulation re payment suspension (.5); review and revise stipulation re extension of stipulation re payment suspension (.2).
12/31/24	S. Maizel	0.20	225.00	MED/CMS	Review and comment on draft press release re DOJ investigation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
12/31/24	C. Doherty, Jr.	0.20	177.30	MED/CMS	Review and respond to emails regarding filing of DOJ stipulation.
12/31/24	T. Moyron	3.70	3,646.35	MED/CMS	Zoom conference with R. Millien, K. Manning, K. Greer, I. Lee, etc. re negotiations with DOJ over FCA investigation (1.0); correspond with DOJ re stipulation (.5); telephone conference with S. Maizel re same (.1); zoom conference with A. Curtis, S. Maizel, Ankura, etc. re continuation of stipulation re payment suspension (.3); telephone conference with S. Maizel re notice of extension of stipulation re payment suspension (.1); analyze and respond to emails with GWC, Ankura, and Dentons re stipulation and filing (.7); review, prepare, and finalize stipulation re extension of stipulation re payment suspension (1.0).
	Subtotal	180.40	182,672.10		

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TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
S. Maizel	\$ 1,125.00	93.40	\$ 105,075.00
T. Moyron	\$ 985.50	119.90	\$ 118,161.45
G. Miller	\$ 891.00	19.50	\$ 17,374.50
N. Hare	\$ 1,125.00	0.50	\$ 562.50
R. Garms	\$ 688.50	1.50	\$ 1,032.75
S. Cenawood	\$ 1,197.00	0.30	\$ 359.10
S. McCandless	\$ 1,039.50	1.60	\$ 1,663.20
J.A. Moe, II	\$ 904.50	11.20	\$ 10,130.40
C. Doherty, Jr.	\$ 886.50	16.40	\$ 14,538.60
D. Cook	\$ 855.00	8.80	\$ 7,524.00
S. Schrag	\$ 963.00	21.40	\$ 20,608.20
S. Ruben	\$ 751.50	5.40	\$ 4,058.10
D. Thomas-Nichols	\$ 423.00	0.10	\$ 42.30
G. Medina	\$ 418.50	6.90	\$ 2,887.65
K.M. Howard	\$ 391.50	<u>8.00</u>	<u>\$ 3,132.00</u>
Totals		314.90	\$ 307,149.75

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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	67,594.05
B120	Asset Analysis and Recovery	288.90
B150	Meetings of and Communications with Creditors	98.55
B160	Fee Applications/Employment Applications	35,536.05
B190	Other Contested Matters (excluding Assumption/Rejection Moti	591.30
B210	Business Operations	1,125.00
B310	Claims Administration and Objections	15,174.45
EMP	Employment	4,069.35
MED/CMS	Medicare/CMS Issues	182,672.10
	Total Fees	\$307,149.75

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COMBINED TOTALS

Total Hours	314.90
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Fee Total, all Matters	\$ 307,149.75
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Invoice Total, all Matters	<u>\$ 307,149.75</u>
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Exhibit E

Summary of Actual and Necessary Expenses for the Fee Period

Summary of Actual and Necessary Expenses for the Fee Period

Expense	Amount
Travel expenses	\$1,902.20
Filing Fees	\$1,972.00
Online Research	\$470.00
FedEx/Postage/Delivery	\$216.11
Pacer/Litigation Support Vendors	\$3,455.00
Total:	\$8,015.31

Exhibit F

BLENDED RATE COMPARISON CHART

BLENDED RATE COMPARISON CHART

Category of Timekeeper	Blended Hourly Rate	
	Billed or Collected by Timekeepers, excluding bankruptcy¹²	Billed in this fee application
(using categories already maintained by the Firm)		
Partner	\$927.28	\$1,028.65
Counsel	\$718.22	\$886.50
Two Senior Associates (7 years or more since first admission)	\$648.50	\$895.72
One Mid-level Associate (4-6 years since first admission)	\$612.25	\$751.50
One Junior Associate (0-3 years since first admission)	\$544.96	\$396.00
Paralegals	\$371.10	\$402.73
All timekeepers aggregated	\$737.70	\$909.97

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