

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

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a  
Professional Corporation,<sup>1</sup>

Debtor.

Chapter 11

Case No. 24-34908 (CML)

**FIRST MONTHLY FEE STATEMENT OF TOGUT, SEGAL & SEGAL LLP  
FOR COMPENSATION FOR SERVICES RENDERED AND FOR  
REIMBURSEMENT OF EXPENSES INCURRED AS CONFLICTS  
COUNSEL FOR THE DEBTOR FOR THE PERIOD FROM  
JANUARY 9, 2025 THROUGH FEBRUARY 28, 2025**

Pursuant to the Interim Compensation Order, Togut, Segal & Segal LLP (the “Togut Firm”) hereby submits this first monthly fee statement (this “Fee Statement”) for compensation for services rendered and for reimbursement of expenses as conflicts counsel to the above-captioned debtor and debtor-in-possession (the “Debtor”) for the period from January 9, 2025 through February 28, 2025 (the “First Fee Period”). A summary chart setting forth the compensation and expenses during the First Fee Period is set forth below:

**SUMMARY CHART**

Name of Applicant:	Togut, Segal & Segal LLP
Applicant's Role in Case:	<i>Conflicts Counsel to the Debtor</i>
Date of Retention: [Docket No. 127]	February 25, 2025, Effective January 9, 2025
Time period covered by this Fee Statement:	January 9, 2025 through February 28, 2025
Time period(s) covered by prior Fee Statements:	N/A
Total amounts awarded in all prior Fee Statements:	N/A
Total fees requested in this Fee Statement: (80% of \$67,210.50)	\$53,768.40

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



Total actual professional hours covered by this Fee Statement:	77.7
Average hourly rate for professionals:	\$865.00
Total paralegal fees requested in this Fee Statement:	\$224.00
Total actual paralegal hours covered by this Fee Statement:	.4
Average hourly rate for paralegals:	\$560.00
Reimbursable expenses sought in this Fee Statement:	\$203.99

### **OBJECTION DEADLINE**

**In accordance with the *Order Granting Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 68] (the "Interim Compensation Order"), each Notice Party or any other party in interest will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen (14) days after the filing of this Fee Statement ("Objection Deadline") to object to the requested fees and expenses in accordance with the procedures described in the Interim Compensation Order. Upon the expiration of the Objection Deadline, the Debtor is authorized to promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the Fee Statement.**

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

1. On January 29, 2025, Global Wound Care Medical Group, a Professional Corporation, filed its *Application for Entry of an Order Authorizing the Employment and Retention of Togut, Segal & Segal LLP as Conflicts Counsel Effective as January 9, 2025* [Docket No. 110] (the "Application"), on which this Court entered an Order approving the Application on February 25, 2025 [Docket No. 127].

2. By this Fee Statement, the Togut Firm requests payment of \$53,768.40 (80% of \$67,210.50) as compensation for reasonable and necessary legal services rendered and \$203.99 for reimbursement of actual and necessary expenses, for a total of \$53,972.39 for the First Fee Period.

3. In support of this Fee Statement, attached are the following exhibits:
- **Exhibit A** (Compensation by Project Category) is a schedule of the aggregate number of hours expended and fees incurred by project category;
  - **Exhibit B** (Compensation by Professional) is a schedule of certain information regarding the Togut Firm's attorneys and paraprofessionals for whose services compensation is sought in this Fee Statement;
  - **Exhibit C** (Expenses by Category) is a schedule of the expenses incurred by category for which reimbursement is sought in this Fee Statement; and
  - **Exhibit D** (Invoices) consists of detailed records (including the relevant time entry and description and expense detail) for services rendered and reimbursement of expenses incurred during the First Fee Period.

4. Although every effort has been made to include all fees and expenses incurred in the First Fee Period, some fees and expenses might not be included in this Fee Statement due to delays caused by accounting and processing during the First Fee Period. The Togut Firm reserves the right to seek allowance of such fees and expenses not included herein. Subsequent monthly fee statements will be submitted in accordance with the Interim Compensation Order.

#### **NOTICE**

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

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

Attn: Ha Nguyen, 515 Rusk Street, Suite 3516, Houston, Texas 77002

(ha.nguyen@usdoj.gov); and

c. any other parties that the Court may designate.

WHEREFORE, the Togut Firm respectfully requests payment and reimbursement of its fees and expenses incurred during the First Fee Period in the total amount of \$53,972.39 consisting of (a) \$53,768.40, which is 80% of the fees for reasonable and necessary legal services rendered, and (b) \$203.99, which is 100% of the actual and necessary expenses incurred, in accordance with the procedures set forth in the Interim Compensation Order.

### **CONCLUSION**

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

Dated: May 5, 2025  
New York, New York

Respectfully submitted,

TOGUT, SEGAL & SEGAL LLP

By:

/s/Kyle J. Ortiz

Kyle J. Ortiz (admitted *pro hac vice*)

Jared C. Borriello (admitted *pro hac vice*)

One Penn Plaza, Suite 3335

New York, New York 10119

Telephone: (212) 594-5000

Facsimile: (212) 967-4258

*Conflicts Counsel to the Debtor*

## **EXHIBIT "A"**

Global Wound Care  
1/9/2025...2/28/2025

**Togut, Segal & Segal LLP**  
**Summary Report**

4/23/2025  
11:32:16 AM

ID	Name/Description	Slip Hours	Slip Amount
	Automatic Stay Issues	60.6	52,884.00
	Case Status/Strategy	0.2	202.00
	Research	0.1	101.00
	Retention of Professionals	16.8	14,023.50
	Grand Total:	<u>77.7</u>	<u>67,210.50</u>

Global Wound Care  
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**Togut, Segal & Segal LLP**  
**Summary Report**

4/23/2025  
11:32:34 AM

ID	Name/Description	Slip Hours	Slip Amount
<b>Automatic Stay Issues</b>		<b>60.6</b>	<b>52,884.00</b>
aglaubach	Amanda Glaubach	25.8	26,058.00
kortiz	Kyle Ortiz	5.5	7,122.50
lebrahimi	Leila Ebrahimi	21.7	11,609.50
rhoward	Ronald Howard	7.6	8,094.00
<b>Case Status/Strategy</b>		<b>0.2</b>	<b>202.00</b>
aglaubach	Amanda Glaubach	0.2	202.00
<b>Research</b>		<b>0.1</b>	<b>101.00</b>
aglaubach	Amanda Glaubach	0.1	101.00
<b>Retention of Professionals</b>		<b>16.8</b>	<b>14,023.50</b>
aglaubach	Amanda Glaubach	9.3	9,393.00
dperson	Dawn Person	0.4	224.00
kortiz	Kyle Ortiz	0.8	1,036.00
lebrahimi	Leila Ebrahimi	6.3	3,370.50
Grand Total:		77.7	67,210.50

## **EXHIBIT "B"**



Global Wound Care  
1/9/2025...2/28/2025

**Togut, Segal & Segal LLP**  
**Summary Report**

4/23/2025  
11:31:43 AM

ID	Name/Description	Slip Hours	Slip Amount
aglaubach	Amanda Glaubach	35.4	35,754.00
dperson	Dawn Person	0.4	224.00
kortiz	Kyle Ortiz	6.3	8,158.50
lebrahimi	Leila Ebrahimi	28.0	14,980.00
rhoward	Ronald Howard	7.6	8,094.00
Grand Total:		77.7	67,210.50

## **EXHIBIT "C"**

Global Wound Care  
1/9/2025...2/28/2025

**Togut, Segal & Segal LLP**  
**Summary Report**

4/23/2025  
11:54:37 AM

ID	Name/Description	Slip Hours	Slip Amount
	Online Research	0.0	203.99
	Grand Total:	<u>0.0</u>	<u>203.99</u>

## **EXHIBIT “D”**

Global Wound Care  
1/9/2025...2/28/2025

**Togut, Segal & Segal LLP**  
**Client Billing Report**

4/23/2025  
11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
**Client Billing Report**

4/23/2025  
11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
Client Billing Report

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11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
Client Billing Report

4/23/2025  
11:32:50 AM

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



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**Togut, Segal & Segal LLP**  
**Client Billing Report**

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

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

Global Wound Care  
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**Togut, Segal & Segal LLP**  
**Client Billing Report**

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11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
**Client Billing Report**

4/23/2025  
11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
**Client Billing Report**

4/23/2025  
11:32:50 AM

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

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**Togut, Segal & Segal LLP**  
**Client Billing Report**

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

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**Togut, Segal & Segal LLP**  
**Client Billing Report**

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

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



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

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

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

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

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
2/25/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1218417	TC with KO re call with S. Davis re Bank Account.			
2/25/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1218418	Draft email re update on call with GWC counsel.			
2/28/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1219013	Comms with AG KO and clients re update from WS counsel and schedule call re same			
2/28/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219990	Emails with client re banking relationship.			
2/28/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219994	Internal emails re client email re bank items.			
2/28/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1222250	Communication with S. Davis on Wells Fargo issue and setting up a call			

Matter Total: 60.60 52,884.00

**Matter: Case Status/Strategy**

1/22/25	aglaubach / Comm. Client Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1210618	Email to Dentons and client re Wells Fargo update.			
1/29/25	aglaubach / Comm. Client Case Status/Strategy	T	0.1 1,010.00	101.00 Billable
#1211886	Email to Dentons and client re WF update.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
Matter Total:		0.20		202.00
<b>Matter: Research</b>				
1/21/25	aglaubach / Inter Off Memo Research	T	0.1 1,010.00	101.00 Billable
#1210385	Emails with JT re research re TRO and preliminary injunction.			
Matter Total:		0.10		101.00
<b>Matter: Retention of Professionals</b>				
1/10/25	lebrahimi / Correspondence Retention of Professionals	T	0.2 535.00	107.00 Billable
#1208251	Comms with AG re retention app			
1/10/25	lebrahimi / Draft Documents Retention of Professionals	T	0.9 535.00	481.50 Billable
#1208280	draft shell retention app			
1/10/25	aglaubach / Draft Documents Retention of Professionals	T	2.1 1,010.00	2,121.00 Billable
#1208332	Drafting re retention app and review precedent re same.			
1/14/25	aglaubach / Revise Docs. Retention of Professionals	T	0.8 1,010.00	808.00 Billable
#1209158	Additional revisions to retention application.			
1/14/25	aglaubach / Draft Documents Retention of Professionals	T	0.8 1,010.00	808.00 Billable
#1209160	Drafting re company declaration ISO retention application.			
1/14/25	aglaubach / Draft Documents Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1209166	Additional drafting re company declaration.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/17/25	aglaubach / Draft Documents Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1209671	Draft attorney declaration re retention.			
1/20/25	aglaubach / Revise Docs. Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1209973	Additional edits re Cetrulo declaration re retention application.			
1/20/25	aglaubach / Draft Documents Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1209974	Drafting re order re retention.			
1/21/25	lebrahimi / Correspondence Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210236	OC w/AG re retention app			
1/21/25	lebrahimi / Draft Documents Retention of Professionals	T	0.9 535.00	481.50 Billable
#1210242	Draft Ortiz Declaration Retention App			
1/21/25	lebrahimi / Review Docs. Retention of Professionals	T	0.4 535.00	214.00 Billable
#1210245	Review AG draft retention app and make revisions re same			
1/21/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210289	OC with AG re questions re local rule requirements in connection with Ortiz Declaration			
1/21/25	lebrahimi / Research Retention of Professionals	T	0.3 535.00	160.50 Billable
#1210290	Research re local bankr rules for S.D. Texas in connection with requirement for TSS retention app			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/21/25	lebrahimi / Draft Documents Retention of Professionals	T	0.5 535.00	267.50 Billable
#1210291	Draft Proposed Order for Retention App			
1/21/25	lebrahimi / Review Docs. Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210293	Review AG draft Cetrulo decl and make revisions re same			
1/21/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1210299	Comms with KO re TSS retention app and declarations for review			
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1210398	OC with LE re GWC retention application.			
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210407	TC with LE re retention application			
1/21/25	aglaubach / Revise Docs. Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1210409	Review and revise Ortiz declaration ISO retention.			
1/21/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210410	Review and revise order re TSS retention.			
1/21/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210411	TC with LE re retention papers.			
1/21/25	kortiz / Review Docs. Retention of Professionals	T	0.8 1,295.00	1,036.00 Billable
#1212213	Review and comment on retention application			



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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/22/25	lebrahimi / Research Retention of Professionals	T	0.9 535.00	481.50 Billable
#1210445	Research nunc pro tunc relief precedent in S D Texas and local bank rules re same in connection with revisions to TSS retention app			
1/22/25	lebrahimi / Revise Docs. Retention of Professionals	T	0.6 535.00	321.00 Billable
#1210446	Revise TSS Retention App and KO Declaration to implement KO revisions re 2025 rates and nunc pro tunc relief			
1/22/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210447	OC with AG re nunc pro tunc relief precedent in connection with TSS retention app			
1/22/25	lebrahimi / Review Docs. Retention of Professionals	T	0.2 535.00	107.00 Billable
#1210448	Review KO comments to Retention App and Ortiz Decl and comms with KO and AG re same			
1/22/25	aglaubach / Review Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210600	Review KO edits to declaration and retention application (.2) and internal emails with KO and LE re same (.1).			
1/22/25	aglaubach / Research Retention of Professionals	T	0.4 1,010.00	404.00 Billable
#1210609	Research (.2) and emails with LE re retention application and edits to same (.2).			
1/22/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210610	TC with LE re edits to retention application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/22/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210619	TC with LE re GWC retention.			
1/22/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210622	Internal emails with KO and LE retention application.			
1/22/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210642	Review revised retention app and revise re same.			
1/22/25	aglaubach / Revise Docs. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210643	Review and revise Ortiz declaration ISO retention application.			
1/22/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210644	internal emails re revised retention pleadings.			
1/23/25	aglaubach / Review Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1210654	Review of retention papers and EL in advance of sending same to client and Dentons.			
1/23/25	aglaubach / Comm. Client Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1210655	Email to client and Dentons re retention papers.			
1/28/25	aglaubach / Comm. Others Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211467	Call with Dentons re GWC retention application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/29/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211569	Comms with AG DP re update on timing of filing retention papers			
1/29/25	lebrahimi / Correspondence Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211602	Comms with AG KO re Dentons revisions to retention papers			
1/29/25	lebrahimi / Comm. Profes. Retention of Professionals	T	0.1 535.00	53.50 Billable
#1211604	Comms with Dentons re filing retention papers			
1/29/25	lebrahimi / OC/TC strategy Retention of Professionals	T	0.2 535.00	107.00 Billable
#1211616	OC with AG re issues with retention filing			
1/29/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211864	Internal communications with LE and KO re revised retention application.			
1/29/25	aglaubach / Comm. Profes. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211865	Call with Dentons re retention application.			
1/29/25	aglaubach / Revise Docs. Retention of Professionals	T	0.3 1,010.00	303.00 Billable
#1211866	Review of EL in connection with Ortiz declaration.			
1/29/25	aglaubach / Comm. Profes. Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211867	Emails with Dentons re filing retention application.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
1/29/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1211869	TC with JC re GWC filings.			
1/29/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1211870	Internal emails with KO and LE re GWC documents .			
1/29/25	aglaubach / OC/TC strategy Retention of Professionals	T	0.2 1,010.00	202.00 Billable
#1211871	TC with LE re GWC retention app issues.			
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.1 560.00	56.00 Billable
#1212806	E-mails with AG and LE re: Status for filing of Retention Application.			
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.1 560.00	56.00 Billable
#1212808	E-mail with JC and AG re: filing related issues for Togut retention application in SD Texas.			
1/29/25	dperson / Inter Off Memo Retention of Professionals	T	0.2 560.00	112.00 Billable
#1214729	Emails with AG re: Togut Retention Status.			
2/26/25	aglaubach / Inter Off Memo Retention of Professionals	T	0.1 1,010.00	101.00 Billable
#1218792	Internal emails re TSS entered retention order.			
Matter Total:		16.80		14,023.50

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**Date**  
**Slip Number**

**T/E**

**Hours**  
**Rate**

**Slip Amount**  
**Billing Status**

Total Time Bill: 67,210.50

Total Time Non Bill:

Total Costs Bill:

Total Costs Non Bill:

Total Non Billable:

Total Billable: 67,210.50

Grand Total: 67,210.50

## Togut, Segal &amp; Segal LLP

## Expense Detail

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Date / Slip Number Matter Description	Timekeeper Client Activity	Billing Status	Rate	Total
<b>Global Wound Care</b>				
1/31/2025    #1213799 General	atogut Global Wound Care Online Research	<b>Bi</b>	203.99	203.99
Westlaw research for January 2025.				
Subtotal For: <b>Online Research</b>		Billable Unbillable	0.0	203.99
Total For: <b>Global Wound Care</b>		Billable Unbillable	0.0	203.99
Grand Total		Billable Unbillable	0.0	203.99