

**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)

**SECOND 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  
MARCH 1, 2025 THROUGH MARCH 31, 2025**

Pursuant to the Interim Compensation Order, Togut, Segal & Segal LLP (the "Togut Firm") hereby submits this second 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 March 1, 2025 through March 31, 2025 (the "Second Fee Period"). A summary chart setting forth the compensation and expenses during the Second 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 Second Fee Statement:	March 1, 2025 through March 31, 2025
Time period(s) covered by prior Fee Statements:	January 9, 2025 through February 28, 2025

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



Total amounts awarded in all prior Fee Statements:	N / A <sup>2</sup>
Total fees requested in this Second Fee Statement: (80% of \$40,297.50)	\$32,238.00
Total actual professional hours covered by this Second Fee Statement:	48.9
Average hourly rate for professionals:	\$824.08
Total paralegal fees requested in this Second Fee Statement:	N / A
Total actual paralegal hours covered by this Second Fee Statement:	N / A
Average hourly rate for paralegals:	N / A
Reimbursable expenses sought in this Second Fee Statement:	\$0.00

### **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 Second 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 Second 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"). The Court entered an Order approving the Application on February 25, 2025 [Docket No. 127].

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<sup>2</sup> As set forth below, on May 5, 2025, the Togut Firm filed its First Fee Statement (as defined below) requesting payment of \$53,972.39.

2. On May 5, 2025, the Togut Firm filed its *First Monthly Fee Statement for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Conflicts Counsel for the Debtor for the Period from January 9, 2025 Through February 28, 2025* [Docket No. 193] (the “First Fee Statement”), requesting payment of \$53,768.40 (80% of \$67,210.50) as compensation for reasonable and necessary legal services rendered and \$203.99 for reimbursement of actual and necessary expenses.

3. By this Second Fee Statement, the Togut Firm requests payment of \$32,238.00 (80% of \$40,297.50) as compensation for reasonable and necessary legal services rendered and \$0.00 for reimbursement of actual and necessary expenses, for a total of \$32,238.00 for the Second Fee Period.

4. 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 Second Fee Statement;
- **Exhibit C** (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 Second Fee Period.

5. Although every effort has been made to include all fees and expenses incurred in the Second Fee Period, some fees and expenses might not be included in this Second Fee Statement due to delays caused by accounting and processing during the Second 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**

6. Pursuant to the Interim Compensation Order, notice of this Second 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 Second Fee Period in the total amount of \$32,238.00, which is 80% of the fees for reasonable and necessary legal services rendered, in accordance with the procedures set forth in the Interim Compensation Order.

*[Concludes on following page.]*

**CONCLUSION**

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

Dated: May 19, 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  
3/1/2025...3/31/2025

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

5/6/2025  
11:40:47 AM

ID	Name/Description	Slip Hours	Slip Amount
	Automatic Stay Issues	48.3	39,691.50
	Case Status/Strategy	0.6	606.00
	Grand Total:	<u>48.9</u>	<u>40,297.50</u>

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

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

5/6/2025  
11:41:06 AM

ID	Name/Description	Slip Hours	Slip Amount
<b>Automatic Stay Issues</b>		<b>48.3</b>	<b>39,691.50</b>
aglaubach	Amanda Glaubach	23.4	23,634.00
kortiz	Kyle Ortiz	3.6	4,662.00
lebrahimi	Leila Ebrahimi	21.3	11,395.50
<b>Case Status/Strategy</b>		<b>0.6</b>	<b>606.00</b>
aglaubach	Amanda Glaubach	0.6	606.00
Grand Total:		48.9	40,297.50



## **EXHIBIT "B"**

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

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

5/6/2025  
11:40:20 AM

ID	Name/Description	Slip Hours	Slip Amount
aglaubach	Amanda Glaubach	24.0	24,240.00
kortiz	Kyle Ortiz	3.6	4,662.00
lebrahimi	Leila Ebrahimi	21.3	11,395.50
Grand Total:		48.9	40,297.50

## **EXHIBIT "C"**

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

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
<b>Matter: Automatic Stay Issues</b>				
3/4/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1219617	Call with R. Cetrulo, I. Lee, T. Moyron re: Wells Fargo discussion and timeline for transition			
3/4/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1219631	Call with KO AG and Dentons and clients re update of WF accounts			
3/4/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1219705	Call with AG and S. Davis (Winstead) re: Wells Fargo relationship and timing			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1219785	OC with KO in advance of GWC call re same.			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1219787	Call with KO, LE, Dentons, and client re Wells Fargo and next steps re same.			
3/4/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1219788	Emails with counsel to WF (Winstead) re call scheduling.			
3/4/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1219796	Call with Winstead and KO re WF account.			
3/4/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1219797	Follow up call with KO post call with Winstead.			

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/4/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1219801	Draft update email to client re call with WF counsel (Winstead).			
3/11/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222410	Email to client re status of negotiations re banking exception.			
3/11/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222418	Internal emails with LE with KO re GWC email.			
3/12/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222269	TC with AG re WF account issues; update to autostay motion			
3/12/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222359	TC with KO re next steps in connection with Wells Fargo negotiations.			
3/12/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222360	Email to R. Cetrulo re status of WF negotiations.			
3/12/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222361	Emails with S. Davis (Winstead) re negotiation status.			
3/12/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222362	Emails with Dentons re negotiation status.			

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/12/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222363	Email from client re negotiation status and TC with KO re same.			
3/12/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222364	Call with KO and T. Moyron re case status.			
3/12/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222365	Follow up call with LE re GWC status.			
3/12/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222366	Emails with KO and LE re GWC materials and status re same.			
3/13/25	kortiz / Comm. Others Automatic Stay Issues	T	0.1 1,295.00	129.50 Billable
#1222401	E-mail with R. Cetrulo on Wells Fargo and whether account can be shifted			
3/13/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1222466	Multiple OCs with AG re updates to autostay memo of law			
3/13/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1222467	Review prior draft of autostay motion re updates to memo of law re WF account issues			
3/13/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222468	Comms with AG and KO and client re updates from WF counsel			

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/13/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1222476	OC KO AG re updates to memo of law for tro / prelim inj motion			
3/13/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222478	Review AG revised complaint			
3/13/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.6 1,010.00	606.00 Billable
#1222770	Updates to TRO complaint.			
3/13/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.2 1,010.00	1,212.00 Billable
#1222777	Updates to complaint re current status with WF.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222783	OC with LE re GWC motion and complaint status.			
3/13/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.5 1,010.00	505.00 Billable
#1222789	Call with KO and S. Davis (Winstead) re next steps.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222794	TC with KO re follow up from call with counsel to WF.			
3/13/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222795	Emails with client re update re WF negotiations.			
3/13/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222797	Email to S. Davis (Winstead) re WF negotiations.			

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

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11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/13/25	aglaubach / Comm. Profes. Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222799	Email to Ankura re banking agreement.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222800	OC with LE re next steps re WF negotiations.			
3/13/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1222805	Emails with KO in advance of GWC call re same.			
3/13/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1222813	Review research in connection with autostay.			
3/13/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.5 1,010.00	505.00 Billable
#1222815	OC with KO and LE re GWC and memo / complaint re same.			
3/13/25	aglaubach / Draft Documents Automatic Stay Issues	T	2.7 1,010.00	2,727.00 Billable
#1222818	Additional drafting and revising re memo of law.			
3/14/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1222645	Call with KO AG, Dentons and Client re updates on WF bank account issues			
3/14/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1222752	Multiple comms with AG KO re current draft of TRO / Prelim inj complaint and KO questions re same			



Global Wound Care  
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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
3/14/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1222753	Review AG revisions to TRO / Prelim inj complaint and memo of law			
3/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.7 1,010.00	1,717.00 Billable
#1223071	Additional edits and drafting re memo of law.			
3/14/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1223073	Call with client re next steps re Wells Fargo negotiations.			
3/14/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1223077	Internal emails re revised draft of memo of law.			
3/14/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1223081	Additional internal emails re revised MOL and Complaint.			
3/14/25	aglaubach / Revise Docs. Automatic Stay Issues	T	1.1 1,010.00	1,111.00 Billable
#1223083	Additional revisions and edits to complaint (.7) and research re same (.4).			
3/14/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1223748	Call with R. Cetrulo, I. Lee, T. Moyron and team to discuss how to proceed with Wells Fargo			
3/17/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223127	Comms with JB AG KO BS JMC re question re TRO procedures in connection with motion for TRO / prelim inj.			

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

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11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/17/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1223129	Review and revise LE email re GWC documents.			
3/17/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.9 535.00	481.50 Billable
#1223936	Further revise tro / preim inj motion re argument section			
3/18/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225470	Comms with AG re outstanding research issues in connection with tro / prelim inj motion			
3/20/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1224454	Email to client and Dentons re status of negotiations with DOJ.			
3/21/25	kortiz / Comm. Others Automatic Stay Issues	T	0.2 1,295.00	259.00 Billable
#1223829	Call with AG in prep for call with Wells Fargo			
3/21/25	kortiz / Comm. Others Automatic Stay Issues	T	0.3 1,295.00	388.50 Billable
#1223842	Call with S. Davis (Winstead) and AG on Wells Fargo dispute and potential for reporting to help same			
3/21/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223927	Comms with AG KO and client re status update for WF counsel and next steps			
3/21/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223928	Comms AG re status update from WF counsel; edits to tro / prelim inj motion			

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/21/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1223929	Comms with JB AG re revisions to tro / prelim inj motion			
3/21/25	lebrahimi / Research Automatic Stay Issues	T	1.3 535.00	695.50 Billable
#1223931	Research 5th circ. precedent tro / prelim inj motions; research local rules re same in connection with JB comments to tro / prelim inj motion			
3/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224472	Call with KO re GWC automatic stay call.			
3/21/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1224473	Call with KO and S. Davis (Winstead) re automatic stay.			
3/21/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224474	Emails with JB re preliminary injunction motion.			
3/21/25	aglaubach / Research Automatic Stay Issues	T	0.6 1,010.00	606.00 Billable
#1224475	Research re preliminary injunction motion and revising items re same.			
3/21/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224476	Email to client re case re update on call with WF.			
3/21/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1224477	TC with LE re GWC next steps post call with client re same.			

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

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/21/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1224478	Review docket re monthly fee statements and internal emails re same.			
3/21/25	aglaubach / Research Automatic Stay Issues	T	1.2 1,010.00	1,212.00 Billable
#1224479	Additional research re S.D. Texas caselaw re preliminary injunction.			
3/25/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1224309	OC AG re updates to tro / prelim inj motion			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	0.8 535.00	428.00 Billable
#1224560	Research 5th circuit precedent for TRO / prelim inj			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	0.5 535.00	267.50 Billable
#1224563	Research local S.D. Texas rules re tro / prelim inj motions, adversary proceedings			
3/26/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1224567	OC with AG re 5th circuit precedent tro / prelim inj motions			
3/26/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	1.9 535.00	1,016.50 Billable
#1224569	Revise MOL for tro / prelim inj re update to conform to 5th circuit precedent			
3/26/25	lebrahimi / Research Automatic Stay Issues	T	1.3 535.00	695.50 Billable
#1224761	Research precedent re closing bank account is violation of autostay			

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

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/26/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225383	Email to S. Davis (Winstead) re MORs.			
3/26/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225384	Follow up email to client re status update.			
3/26/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225385	Review documents in connection with responding to client.			
3/26/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225387	TC with LE re GWC precedent re complaint and motion.			
3/26/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225464	OC AG re SD Texas local rules in connection with revisions to tro / prelim inj motion			
3/26/25	kortiz / Comm. Others Automatic Stay Issues	T	0.3 1,295.00	388.50 Billable
#1226892	E-mails with AG on reporting and updates relating to Wells Fargo dispute			
3/27/25	lebrahimi / Research Automatic Stay Issues	T	0.9 535.00	481.50 Billable
#1225115	Research 5th circuit case law re circumstance where injunction warranted without violation of autostay			
3/27/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	1.4 535.00	749.00 Billable
#1225121	Further revise MOL for prelim inj / tro re updates 5th cir. case law and circulation to KO AG and JB for review			

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

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

5/6/2025  
11:41:19 AM

Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/27/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225460	Comms with AG KO re DOJ reporting requirements in connection with GWC / WF negotiations; review DOJ stip re same			
3/27/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225907	Internal emails with KO re revisions to DOJ stipulation.			
3/27/25	aglaubach / Review Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225908	Review revised draft of emergency motion.			
3/28/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225551	Multiple comms with AG KO re update from Wells Fargo counsel re termination of account			
3/28/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225552	Multiple comms with AG KO JMC BFS re review and questions re tro / preliminj motion			
3/28/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225917	Email to client re WF reporting obligations.			
3/28/25	aglaubach / Review Docs. Automatic Stay Issues	T	1.5 1,010.00	1,515.00 Billable
#1226446	Review updated draft of memo of law (1.2) and updates to complaint re same (.3)			
3/29/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1225548	Multiple comms with KO BFS JMC re comments and questions regarding tro / prelim inj motion			

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3/30/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225549	OC with KO BFS JMC AG re tro / prelim inj motion			
3/30/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	1.1 535.00	588.50 Billable
#1225550	OC AG with re revise and update tro / prelim inj brief before circulation to KO for review			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225553	Comms with KO AG and WF counsel re bank account closure discussions			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225554	Comms with KO AG and Dentons re update from WF counsel re bank account and draft pleadings re same			
3/30/25	lebrahimi / Comm. Profes. Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225555	Call with Dentons re tro / prelim inj pleadings			
3/30/25	lebrahimi / Review Docs. Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225706	Review prelim inj. decisions from JMC in connection with updates to motion			
3/30/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225825	Further revise fact section / irreparable harm section of TRO / Prelim inj brief before circulation to KO			
3/30/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1225918	Call with BS, LE, KO and JMC re TRO papers.			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/30/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	1.1 1,010.00	1,111.00 Billable
#1225920	OC with LE re updates to memo of law.			
3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225921	Add conforming edits to complaint after updates to memo of law.			
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225923	Internal emails with team re revised documents.			
3/30/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225924	Email to client re revised pleadings.			
3/30/25	aglaubach / Comm. Others Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225925	Email to S. Davis (Winstead) re call scheduling.			
3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.3 1,010.00	303.00 Billable
#1225926	Revise memo of law to include KO comments.			
3/30/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225927	Revise complaint to include KO comments.			
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225928	Internal emails with KO and team re revised autostay documents.			



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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/30/25	aglaubach / Comm. Client Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225929	Email to client re revised pleadings in advance of call re same.			
3/30/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225930	Emails with team and S. Davis re call scheduling.			
3/30/25	kortiz / Comm. Others Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1226906	Call with AG, BS, and LE on Wells Fargo Complaint and associated declaration			
3/30/25	kortiz / Review Docs. Automatic Stay Issues	T	0.7 1,295.00	906.50 Billable
#1226907	Review TRO motion			
3/30/25	kortiz / Review Docs. Automatic Stay Issues	T	0.4 1,295.00	518.00 Billable
#1226910	Review and comment on complaint			
3/31/25	lebrahimi / OC/TC strategy Automatic Stay Issues	T	0.4 535.00	214.00 Billable
#1225659	OC with AG re declaration for tro / prelim inj motion			
3/31/25	lebrahimi / Draft Documents Automatic Stay Issues	T	2.1 535.00	1,123.50 Billable
#1225660	Draft decl for TRO / Prelim inj motion; review draft prelim inj motion, cash management motion and order and FDD re same			
3/31/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225692	Comms with AG re AG edits to tro /prelim inj declaration			

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Date Slip Number		T/E	Hours Rate	Slip Amount Billing Status
3/31/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225707	Follow up comms with Dentons re status of declarant for TRO / Prelim inj motion			
3/31/25	lebrahimi / Correspondence Automatic Stay Issues	T	0.1 535.00	53.50 Billable
#1225708	Comms with KO AG re declaration for prelim inj / tro motion			
3/31/25	lebrahimi / Comm. Client Automatic Stay Issues	T	0.2 535.00	107.00 Billable
#1225813	Comms with Dentons and client re updates to declaration			
3/31/25	lebrahimi / Revise Docs. Automatic Stay Issues	T	0.3 535.00	160.50 Billable
#1225821	Revise brief tro / prelim inj in connection with updates from draft declaration re same			
3/31/25	aglaubach / OC/TC strategy Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225935	TC with LE re declaration.			
3/31/25	aglaubach / Revise Docs. Automatic Stay Issues	T	0.4 1,010.00	404.00 Billable
#1225942	Review and revise draft declaration re TRO papers.			
3/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.1 1,010.00	101.00 Billable
#1225943	Emails with LE re revised declaration.			
3/31/25	aglaubach / Inter Off Memo Automatic Stay Issues	T	0.2 1,010.00	202.00 Billable
#1225946	Internal communications with LE re declaration and other items.			

Matter Total: 48.30 39,691.50

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

Matter Total: 0.60 606.00

Total Time Bill: 40,297.50

Total Time Non Bill:

Total Costs Bill:

Total Costs Non Bill:

Total Non Billable:

Total Billable: 40,297.50

Grand Total: 40,297.50