

G. EVERETT SINOR, JR.
Attorney at Law

November 5, 2019

The Honorable Sue Tollett
Clerk and Master
Cumberland County Chancery Court
60 Justice Center Drive, Suite 226
Crossville, Tennessee 38555

*RE: Tennessee Public Utilities Commission v. Laurel Hills Condominiums
Property Owners Association, Docket No. 2012-CH-560*

VIA UNITED PARCEL SERVICE

Dear Ms. Tollett:

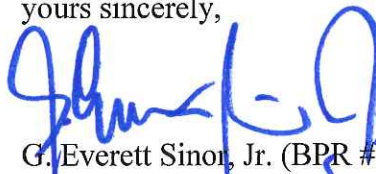
Please find enclosed herewith the following:

1. The Receiver's Thirty-Third Report and Motion for Approval of Fees and Expenses, Authorization for Payment of Certain Fees and Expenses, and for an Interim Taxation of Costs; and,
2. A proposed Order Granting the Receiver's Motion.

Please return to me a copy of these documents, once stamped filed with your office, in the self-addressed, stamped envelope. **Also, please be advised of my new business address, which is as follows: 101 Creekside Crossing, Suite 1700, #288, Brentwood, Tennessee 37027.**

Thanking you for your consideration of this matter, I remain,

yours sincerely,



G. Everett Sinor, Jr. (BPR #017564)
Attorney at Law

Enclosures

cc: Receivership Management, Inc.
Daniel Moore, Esq.
Aaron Conklin, Esq.
Scott D. Hall, Esq.
Vance Broemel, Esq.
Randy York, Esq.

IN THE CHANCERY COURT FOR CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

RECEIVER'S THIRTY-THIRD REPORT AND MOTION FOR APPROVAL OF FEES AND
EXPENSES, AUTHORIZATION FOR PAYMENT OF CERTAIN FEES AND EXPENSES,
AND FOR AN INTERIM TAXATION OF COSTS

Robert E. Moore, Jr., Attorney and President of Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed Receiver of the Laurel Hills water system [hereinafter the "LHWS"] previously controlled by Laurel Hills Condominiums Property Owners Association [hereinafter the "Laurel Hills Condominiums POA"], submits this, the Receiver's Thirty-Third Report, and moves this Honorable Court for an order approving the fees and expenses presented for payment by the Receiver and authorizing payment to the Receiver of certain fees and expenses and for an interim taxation of costs.

1. On October 26, 2015, the Plaintiff, the Tennessee Public Utility Commission [hereinafter the "TPUC" or the "Commission"], filed a Motion for Appointment of Receiver in the above-styled action. Said motion was granted that same day, and, pursuant to Tenn.

Code Ann. §§ 65-3-105 and 29-1-101, the Court appointed Receivership Management, Inc. as Receiver of the Laurel Hills Water System by order dated October 26, 2015.¹

Implementation of Receiver's Second Modified Receivership Plan

2. The Court granted the Receiver's motion on June 19, 2019, approved and adopted the Receiver's Second Modified Receivership Plan [hereinafter the "Receivership Plan"] as submitted, and directed the Receiver to forthwith carry out the Receivership Plan. This the Receiver has done.

3. The Receiver understands that counsel for the Commission, Aaron Conklin, Esq., (a) has gathered all signatures as required under the executed Global Settlement Agreement; (b) has filed with the Cumberland County Register of Deeds office all documents conveying interests in the LHWS to the Crab Orchard Utility District [hereinafter the "COUD"], as required by, and consistent with, the Global Settlement Agreement; (c) has obtained approval from the State of Tennessee to disburse \$925,000.00 to the COUD as contemplated by the Global Settlement Agreement, with those monies having been so disbursed to the COUD by the State of Tennessee; and (d) will hold in escrow executed documents that convey certain property interests from the COUD to the previous owners (or their successors) upon the COUD completing the new water supply line and other improvements to the LHWS, all as required by, and consistent with, the Global Settlement Agreement.

4. The Global Settlement Agreement, at page 10, ¶ F.3., requires the parties to the Global Settlement Agreement to "[i]n [the instant case] ... enter an Agreed Order of Settlement and Compromise, resolving all Petitions, Complaints and Motions pending in

¹ This order was amended on April 21, 2016, but Receivership Management, Inc. continues to be the court-appointed receiver for the Laurel Hills Water System. *See* Amended Order Appointing Receiver, at ¶ 2, p.1.

the case, said Agreed Order making provisions (1) for the discharging of RMI as Receiver of LHWS, in Receivership, (2) the closing of the LHWS Receivership, and (3) payment of all outstanding fees and expenses incurred by or on behalf of the Receiver ...”.² For the reasons discussed below, the receivership estate cannot be closed at this time, but the Receiver intends to seek signatures to such an Agreed Order and file said Agreed Order with the Court at its earliest opportunity.

Operations and Other Activities of the Receiver

5. The Receiver ceased operating the LHWS as of July 1, 2019, such operations being handed over to the COUD on that date consistent with the Global Settlement Agreement. The Receiver is now engaged in “winddown” activities”. All outstanding bills have been paid by the estate. The only current and future estate fees and expenses expected by the Receiver are: (a) the Receiver’s fees and expenses; and (b) federal income taxes for 2019 and expenses related to the filing of its federal income tax return.

6. The estate’s accounting firm, Lansford & Stephens, has recommended that the estate wait until 2020 to file its 2019 taxes. There will also be some time after the filing of the estate’s taxes where the Internal Revenue Service [hereinafter the “IRS”] will be able to review the estate’s tax return. Accordingly, it is necessary for the estate to remain open until the IRS completes its review and the statute of limitations for contesting the estate’s return has run. The Receiver intends to work with Lansford & Stephens to see if there is any way to shorten the length of time in which the IRS can contest the estate’s return so as to permit the estate to be closed.

7. As the operations of the LHWS have been transferred to the COUD, there is less information to periodically report to the Court. The Amended Order Appointing

² A copy of the Global Settlement Agreement can be found as Exhibit D to the Receiver’s Second Modified Receivership Plan, filed with this Honorable Court on June 4, 2019.

Receiver requires the Receiver to provide an accounting on the estate to the Court “no less than semi-annually”.³ Accordingly, the Receiver intends to provide an accounting to the Court every six (6) months, and file a contemporaneous motion for approval of the Receiver’s fees and expenses with such accountings. A Receiver’s report will also be filed with the Court as and when warranted. If the Court desires more frequent reports or accountings, the Receiver will certainly provide such reports or accounting as directed by the Court.

Current Financial Situation

8. As of July 31, 2019, the LHWS had a cash balance of \$63,238.11 in its main operating account. As of August 31, 2019, the LHWS had a cash balance of \$61,459.14 in its main operating account. As of September 30, 2019, the LHWS had a cash balance of \$58,356.14 in its main operating account. See Collective Exhibit A, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in July, August and September of 2019.⁴

9. The Receiver has generated a number of internal, unaudited financial documents prepared on a modified accrual basis, which are attached hereto as Collective Exhibit B, and which are incorporated herein by reference. Those documents are (1) balance sheets as of July 31, 2019, August 31, 2019 and September 30, 2019; (2) an estimated monthly income statement; and (3) cash flow statements showing cash flow for the months of July, August and September of 2019, and projected cash flows for the month

³ Amended Order Appointing Receiver, ¶ 12, p.6 (entered April 21, 2016).

⁴ Id. It should also be noted that this does not include costs of this matter previously taxed on an interim basis to the Tennessee Public Utility Commission, which amount to \$89,493.23 (the amount taxed to the Commission prior to the July 1, 2016 increase in rates), AS WELL AS significant additional amounts taxed to the Commission to reflect Mr. Matherne’s fees and expenses and further losses incurred since institution of the elevated rate.

of October, 2019. The LHWS is scheduled to run slight deficits until the estate is closed, given that the LHWS is no longer receiving customer water usage fees. A schedule of itemized cash receipts and disbursements for July, August and September of 2019 for the LHWS is contained in a spreadsheet that is attached hereto as Exhibit C and is incorporated herein by reference.

10. The estate's balance sheet, calculated on a modified accrual basis, shows the LHWS with a surplus of \$54,711.77 as of July 31, 2019, a surplus of \$53,866.48 as of August 31, 2019, and with a surplus of \$52,954.88 as of September 30, 2019.⁵ The projected cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of October, 2019.

Fees and Expenses of Receiver

11. Pursuant to the Amended Order Appointing Receiver, compensation for the Receiver is payable from funds or assets of the LHWS, if such funds are available. If the funds or assets of the LHWS are not available to pay Receivership fees and costs, then those fees and costs are to be taxed as interim court costs to be paid by the Commission. The Receiver is to submit invoices to the Commission on a monthly basis for approval. These invoices are reviewed and paid after approval of the Commission and the Court, through an interim taxation of costs, if necessary.⁶

12. As shown in Collective Exhibit D, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, President of the Receiver, and other persons at the Receiver's office, including Ms. Jacqueline Lawson, Ms. Lauren Garcia, and Ms. Jere Cowan, performed work for this Receivership estate for the period of July 1, 2019 through

⁵ See Collective Exhibit B.

⁶ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

July 31, 2019 in the amount of \$861.40.⁷ Mr. Sinor, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period July 1, 2019 through July 31, 2019 in the amount of \$1479.35. Mr. Matherne, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period July 1, 2019 through July 31, 2019 in the amount of \$1296.00.

13. As further shown in Collective Exhibit D, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, President of the Receiver, and other persons at the Receiver's office, including Ms. Jacqueline Lawson, Ms. Lauren Garcia, and Ms. Jere Cowan, performed work for this Receivership estate for the period of August 1, 2019 through August 31, 2019 in the amount of \$638.30.⁸ Mr. Sinor, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period August 1, 2019 through August 31, 2019 in the amount of \$588.00. Mr. Matherne, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period August 1, 2019 through August 31, 2019 in the amount of \$783.00.

14. As further shown in Collective Exhibit D, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, President of the Receiver, and other persons at the Receiver's office, including Ms. Jacqueline Lawson and Ms. Lauren Garcia, performed work for this Receivership estate for the period of September 1, 2019 through

⁷ This figure includes incurred expenses, charged by Receivership Management, Inc., which total \$34.90.

⁸ This figure includes incurred expenses, charged by Receivership Management, Inc., which total \$1.60.

September 30, 2019 in the amount of \$207.60.⁹ Mr. Sinor, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period September 1, 2019 through September 30, 2019 in the amount of \$168.00. Mr. Matherne, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period September 1, 2019 through September 30, 2019 in the amount of \$135.00.

15. The Commission has determined these fees, costs and expenses to be reasonable, appropriate and necessary for the services rendered for the Receivership, and, thus, these fees, costs and expenses have been approved for payment by the Commission. *See* Affidavit of Kelly Cashman-Grams, General Counsel for the Commission, attached hereto as Exhibit E and incorporated herein by reference; *see also* Affidavit of Robert E. Moore, Jr., attached hereto as Exhibit F and incorporated herein by reference.

16. The billings so reviewed, and for which Court approval is sought, are as follows:

- a. for Mr. Moore & others at the Receiver for July of 2019: \$861.40;
- b. for Mr. Sinor working under Mr. Moore for July of 2019: \$1479.35;
- c. for Mr. Matherne working under Mr. Moore for July of 2019: \$1296.00.
- d. for Mr. Moore & others at the Receiver for August of 2019: \$638.30;
- e. for Mr. Sinor working under Mr. Moore for August of 2019: \$588.00;
- f. for Mr. Matherne working under Mr. Moore for August of 2019: \$783.00;
- g. for Mr. Moore & others at the Receiver for September of 2019: \$207.60;
- h. for Mr. Sinor working under Mr. Moore for September of 2019: \$168.00; and,

⁹ This figure includes incurred expenses, charged by Receivership Management, Inc., which totals \$1.00.

i. for Mr. Matherne working under Mr. Moore for September of 2019: \$135.00.

17. In the Amended Order Appointing Receiver, a procedure is set forth in paragraph 10 whereby the Receiver submits to this Honorable Court for approval its fees and expenses. If no opposition is filed within ten (10) calendar days of the filing of this Motion, the Court shall order the approval of the fees and expenses and tax them as costs, if necessary, absent question raised by the Court upon its review. Submitted herewith is a proposed Order Granting Motion for Approval of Fees and Expenses for the Court's consideration if no opposition is filed.

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Motion for Approval of Fees and Expenses and Authorization for Payment

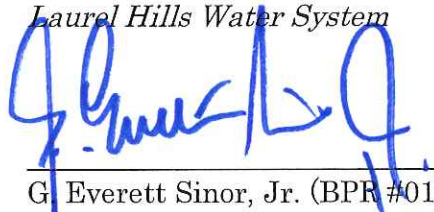
Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the fees and expenses as set forth herein in the aggregate amount of \$6156.65, and further **MOVES** this Court to (a) authorize payment of fees and expenses out of Laurel Hills Water System in Receivership estate's funds in the amount of \$3942.65 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Commission on an interim basis in the amount of \$2214.00 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: November 5, 2019.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: 
Robert E. Moore, Jr. (BPR #013600)
President
Receivership Management Inc.
510 Hospital Drive, Suite 490
Madison, Tennessee 37115
615-370-0051 (Phone)
615-373-4336 (Facsimile)
rmoore@receivermgmt.com (Email)
*Court Appointed Receiver for
Laurel Hills Water System*


G. Everett Sinor, Jr. (BPR #017564)
Attorney at Law
Counsel for Receivership Management, Inc.
101 Creekside Crossing, Suite 1700, #288
Brentwood, Tennessee 37027
615-969-9027 (Phone)
Everett.Sinor@gmail.com (Email)

*by G. Sinor
per mission
granted on 11/26/19*

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing report and motion has been served upon the parties hereto and the other persons listed below, at:

Aaron Conklin, Esq.
Staff Attorney
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

Laurel Hills Condominiums
Property Owners Association
17 Mount Laurel Drive
Post Office Box 288
Crab Orchard, Tennessee 37723

Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
374 Forks of the River Parkway
Sevierville, Tennessee 37862

Vance Broemel, Esq.
Daniel P. Whitaker, Esq.
Consumer Advocate and Protection Division
Tennessee Attorney General and Reporter
Post Office Box 20207
Nashville, Tennessee 37202

Roger York, Esq.
York & Bilbrey
456 North Main Street, Suite 201
Crossville, Tennessee 38555

Daniel J. Moore, Esq.
Wolf, McClane
Counsel for Renegade Mountain CC
900 South Gay Street, Suite 900
Knoxville, Tennessee 37902

via the United States Mails, postage prepaid, this 5th day of November, 2019.


G. Everett Sinor, Jr.

LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

7/31/2019

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	65,320.11	63,238.11
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(2,070.00)	
	<u>63,238.11</u>	<u>63,238.11</u>

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OUTSTANDING CHECKS

1278	2,070.00	
		<u>2,070.00</u>





Regions Bank
 Brentwood
 329 Franklin RD
 Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
 510 HOSPITAL DR STE 490
 MADISON TN 37115-5049

2 - 3

ACCOUNT # 0232618611

Cycle 053
 Enclosures 26
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LIFEGREEN BUSINESS CHECKING
 June 29, 2019 through July 31, 2019

SUMMARY

Beginning Balance	\$78,278.52	Minimum Balance	\$65,320
Deposits & Credits	\$1,499.01 +	Average Balance	\$76,090
Withdrawals	\$11,542.12 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$2,915.30 -		
Ending Balance	\$65,320.11		

DEPOSITS & CREDITS

07/02	Deposit - Thank You	228.48
07/12	Deposit - Thank You	922.07
07/18	Deposit - Thank You	348.46
Total Deposits & Credits		\$1,499.01

WITHDRAWALS

07/29	to Ck#0041418360	11,542.12
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CHECKS

Date	Check No.	Amount	Date	Check No.	Amount
07/03	1273	348.46	07/05	1276	212.00
07/08	1274	584.77	07/23	1277	201.00
07/09	1275	1,569.07			
Total Checks					\$2,915.30

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance	Date	Balance
07/02	78,507.00	07/05	77,946.54	07/09	75,792.70
07/03	78,158.54	07/08	77,361.77	07/12	76,714.77

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 or visit us on the Internet at www.regions.com. (TTY/TDD 1-800-374-5791)



Thank You For Banking With Regions!

2019 Regions Bank Member FDIC. All loans subject to credit approval.



Regions Bank
Brentwood
329 Franklin RD
Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
510 HOSPITAL DR STE 490
MADISON TN 37115-5049

2 of 3

ACCOUNT # 0232618611

Cycle 053
Enclosures 26
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2 of 3

DAILY BALANCE SUMMARY (CONTINUED)

<u>Date</u>	<u>Balance</u>	<u>Date</u>	<u>Balance</u>	<u>Date</u>	<u>Balance</u>
07/18	77,063.23	07/23	76,862.23	07/29	65,320.11

You may request account disclosures containing terms, fees, and rate information (if applicable) for your account by contacting any Regions office.



Regions Bank
 Brentwood
 329 Franklin RD
 Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
 510 HOSPITAL DR STE 490
 MADISON TN 37115-5049

ACCOUNT # 0232618611

Cycle 053
 Enclosures 26
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LIFEGREEN BUSINESS CHECKING

August 1, 2019 through August 30, 2019

SUMMARY

Beginning Balance	\$65,320.11	Minimum Balance	\$61,259
Deposits & Credits	\$212.00 +	Average Balance	\$62,461
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$4,060.97 -		
Ending Balance	\$61,471.14		

DEPOSITS & CREDITS

08/27	Deposit - Thank You	212.00
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CHECKS

Date	Check No.	Amount	Date	Check No.	Amount	
08/06	1278	2,070.00	08/14	1280	990.97	
08/13	1279	1,000.00				
					Total Checks	\$4,060.97

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance	Date	Balance
08/06	63,250.11	08/14	61,259.14	08/27	61,471.14
08/13	62,250.11				

You may request account disclosures containing terms, fees, and rate information (if applicable) for your account by contacting any Regions office.

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61,459.14

LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

9/30/2019

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	58,368.14	58,356.14
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	-	
	<u>58,356.14</u>	<u>58,356.14</u>

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OUTSTANDING CHECKS

-



Regions Bank
 Brentwood
 329 Franklin RD
 Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
 510 HOSPITAL DR STE 490
 MADISON TN 37115-5049

ACCOUNT # **0232618611**

Cycle 053
 Enclosures 26
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LIFEGREEN BUSINESS CHECKING
 August 31, 2019 through September 30, 2019

SUMMARY

Beginning Balance	\$61,471.14	Minimum Balance	\$58,368
Deposits & Credits	\$0.00 +	Average Balance	\$60,328
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$3,103.00 -		
Ending Balance	\$58,368.14		

CHECKS

Date	Check No.	Amount	Date	Check No.	Amount
09/13	1281	1,400.00	09/25	1282	1,703.00
				Total Checks	\$3,103.00

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance
09/13	60,071.14	09/25	58,368.14

You may request account disclosures containing terms, fees, and rate information (if applicable) for your account by contacting any Regions office.

For all your banking needs, please call 1-800-REGIONS (734-4667) or visit us on the Internet at www.regions.com. (TTY/TDD 1-800-374-5791)



Thank You For Banking With Regions!

2019 Regions Bank Member FDIC. All loans subject to credit approval.

LHWS Balance Sheet (as of 7/31/2019) - Modified Accrual Basis*

Current Assets

Cash	\$63,238.11	
Refund owed from CNA Insurance for GL insurance	\$342.00	
Accounts Receivable**	<u>\$0.00</u>	
Total Current Assets		\$63,580.11

Liabilities

Payable - Gerald Williams (June Bill)	\$750.00	
Payable - Gerald Williams (June pump install and parts)	\$250.00	
Payable - Crab Orchard Utility District (remainder of June Bill)	\$990.97	
Payable - Arthur J Gallagher (remainder of GL ins. brokerage fee)	\$2,750.00	
Payable - July 2019 F&E RMI & Sinor	\$2,340.75	
Reserve - Federal Income Taxes Owed (minus FIT prepaid)	\$1,686.62	
Reserve - Lansford & Stephens - (2019 Tax Form Prep.)	<u>\$100.00</u>	

Total Liabilities **\$8,868.34**

Surplus (Deficit) **\$54,711.77**

* Only current assets are included. This balance sheet does not reflect fees previously taxed to the Tennessee Public Utility Commission on an interim basis, and does not show Mr. Matherne's fees and expenses due (which it is presumed will be taxed to the TPUC).

** All accounts receivable have been or will be conveyed to the COUD by virtue of the Global Settlement Agreement, and thus no recognition of this receivable is contained in this balance sheet.



LHWS Balance Sheet (as of 8/31/2019) - Modified Accrual Basis*

Current Assets

Cash	\$61,459.14	
Total Current Assets		\$61,459.14

Liabilities

Payable - CNA/Arthur J. Gallagher (final balance owed)	\$1,703.00	
Payable - July 2019 F&E RMI & Sinor	\$2,340.75	
Payable - August 2019 F&E RMI & Sinor	\$1,226.30	
Reserve - Federal Income Taxes Owed (minus FIT prepaid)	\$2,189.28	
Reserve - Lansford & Stephens - (2019 Tax Form Prep.)	<u>\$133.33</u>	
Total Liabilities		<u>\$7,592.66</u>
Surplus (Deficit)		\$53,866.48

* Only current assets are included. This balance sheet does not reflect fees previously taxed to the Tennessee Public Utility Commission on an interim basis, and does not show Mr. Matherne's fees and expenses due (which it is presumed will be taxed to the TPUC).

LHWS Balance Sheet (as of 9/30/2019) - Modified Accrual Basis*

Current Assets

Cash	\$58,356.14	
Total Current Assets		\$58,356.14

Liabilities

Payable - July 2019 F&E RMI & Sinor	\$2,340.75	
Payable - August 2019 F&E RMI & Sinor	\$1,226.30	
Payable - September 2019 F&E RMI & Sinor	\$375.60	
Reserve - Federal Income Taxes Owed (minus FIT prepaid)	\$1,291.94	
Reserve - Lansford & Stephens - (2019 Tax Form Prep.)	<u>\$166.67</u>	
Total Liabilities		<u>\$5,401.26</u>
Surplus (Deficit)		\$52,954.88

* Only current assets are included. This balance sheet does not reflect fees previously taxed to the Tennessee Public Utility Commission on an interim basis, and does not show Mr. Matherne's fees and expenses due (which it is presumed will be taxed to the TPUC).

Cash Flow for July 2019

Starting Balance (6/30/2019)		\$78,266.52
Customer Deposits in July 2019 (received in June for June water fees)	\$228.48	
Volunteer Electric Cooperative (refund of portion of June payment)	\$348.46	
Volunteer Electric Cooperative (deposit & member fee refund)	\$922.07	
Cash Inflows		<u>\$1,499.01</u>
Current Assets PLUS Cash Inflows		\$79,765.53
RMI & Sinor Fees and Expenses for April, 2019	\$2,053.11	
RMI & Sinor Fees and Expenses for May, 2019	\$2,431.76	
RMI & Sinor Fees and Expenses for June, 2019	\$7,269.25	
<i>(includes separate payment made to Emily Patterson, court reporter)</i>		
Volunteer Electric Cooperative (for portion of June 2019)	\$348.46	
CNA & AJG Insurance Payment (2d installment)	\$2,070.00	
Lansford & Stephens (for June 2019 & mailing to customers)	\$584.77	
Microbac	\$201.00	
Crab Orchard Utility District (for June 2019)	<u>\$1,569.07</u>	
Cash Outflows		<u>\$16,527.42</u>
Ending Balance (7/31/2019)		\$63,238.11

* Mr. Matherne's fees and expenses do not run through the estate

Cash Flow for August 2019

Starting Balance (7/31/2019)		\$63,238.11
Error Double Pay Correction/deposit for court reporter's fee	\$212.00	
Cash Inflows		<u>\$212.00</u>
Current Assets PLUS Cash Inflows		\$63,450.11
Gerald Williams (for June 2019)	\$750.00	
Gerald Williams (June pump install and parts)	\$250.00	
Crab Orchard Utility District (remainder of June 2019--6/17-7/1)	<u>\$990.97</u>	
Cash Outflows		<u>\$1,990.97</u>
Ending Balance (8/31/2019)		\$61,459.14

* Mr. Matherne's fees and expenses do not run through the estate

Cash Flow for September 2019

Starting Balance (8/31/2019)		\$61,459.14
Cash Inflows		<u>\$0.00</u>
Current Assets PLUS Cash Inflows		\$61,459.14
Arthur J Gallagher/CNA (final GL insurance payment)	\$1,703.00	
Internal Revenue Service (3d estimated payment)	<u>\$1,400.00</u>	
Cash Outflows		<u>\$3,103.00</u>
Ending Balance (9/30/2019)		\$58,356.14

* Mr. Matherne's fees and expenses do not run through the estate

Projected Cash Flow for October 2019

Starting Balance (9/30/2019)	\$58,356.14
Cash Inflows	<u>\$0.00</u>
Current Assets PLUS Cash Inflows	\$58,356.14
Cash Outflows	<u>\$0.00</u>
Projected Ending Balance (10/31/2019)	\$58,356.14

* Mr. Matherne's fees and expenses do not run through the estate

Estimated Monthly Income Statement - LHWS*

Income

Average Deposits	<u>\$0.00</u>	
Average Income		\$0.00

Expenses

Federal Income Taxes	\$502.66	
Lansford & Stephens (Accountants - 2019 taxes)	\$33.33	
RMI & Sinor fees and expenses	<u>\$2,000.00</u>	
Average Expenses		\$2,535.99
Projected Monthly Income (Deficit)		-\$2,535.99

* This does not include projected legal fees and expenses for Mr. Matherne

LHWD CASH RECEIPTS (DISBURSEMENTS) - Jul 2019
7/1/2019 through 7/31/2019

Date	Account	Num	Description	Memo	Clr	Amount
EXPENSES						
2185-OUTSIDE CONTRACTORS						
201904-APR 2019	REGIONS LHWD 02326...	XFER	... RECEIVERSHIP MANAGEMENT INC	RMI -APRIL		-15,028.41
7/29/2019						-11,754.12
201905-MAY 2019	REGIONS LHWD 02326...	XFER	... RECEIVERSHIP MANAGEMENT INC	RMI- MAY		-2,053.11
7/29/2019						-2,053.11
201906-JUN 2019	REGIONS LHWD 02326...	XFER	... EMILY PATTERSON, COURT REPORTER	TPUC VS. LHWD		-2,431.76
7/3/2019		1276	... RECEIVERSHIP MANAGEMENT INC	RMI- JUNE		-7,269.25
7/29/2019		XFER				228.48
4010-WATER BILL RECEIPTS						
7/2/2019	REGIONS LHWD 02326...		DEPOSIT			228.48
5695-FEES ACCOUNTING						
7/3/2019	REGIONS LHWD 02326...	1274	LANSFORD & STEPHENS	june 2019		-584.77
6290-UTILITIES						
7/1/2019	REGIONS LHWD 02326...	1273	VOLUNTEER ENERGY COOPERATIVE			-348.46
7/3/2019	REGIONS LHWD 02326...	1275	CRAB ORCHARD UTILITY DISTRICT			-1,569.07
7/12/2019	REGIONS LHWD 02326...	DEP	... DEPOSIT	VEC INACTIVE REFUND		922.07
7/18/2019	REGIONS LHWD 02326...	1277	...MICROBAC LABORATORIES, INC.	RA9G00646		-201.00
7/18/2019	REGIONS LHWD 02326...	DEP	... DEPOSIT	INACTIVE REFUND FROM VEC		348.46
6340-INSURANCE EXPENSE						
7/31/2019	REGIONS LHWD 02326...	1278	...ARTHUR J. GALLAGHER	6024574369		-1,375.00
				6024574369		-695.00
OVERALL TOTAL						-15,028.41



LHWD CASH RECEIPTS (DISBURSEMENTS) - Aug 2019
8/1/2019 through 8/31/2019

Date	Account	Num	Description	Memo	Clr	Amount
EXPENSES						
2185-OUTSIDE CONTRACTORS						
201906-JUN 2019						-1,778.97
8/27/2019	REGIONS LHWD 02326...	DEP				212.00
5697-OTHER CONTRACT LABOR						
8/5/2019	REGIONS LHWD 02326...	1279	... GERALD WILLIAMS	ERROR DOUBLE PAY CORREC...		212.00
6290-UTILITIES						
8/14/2019	REGIONS LHWD 02326...	1280	CRAB ORCHARD UTILITY DISTRICT	JUNE 2019		-1,000.00
						-990.97
						-990.97
				OVERALL TOTAL		-1,778.97

LHWD CASH RECEIPTS (DISBURSEMENTS) - Sep 2019
9/1/2019 through 9/30/2019

Date	Account	Num	Description	Memo	Clr	Amount
	EXPENSES					-3,103.00
	5930-TAXES					-1,409.00
9/9/2019	REGIONS LHWD 02326...	1281	UNITED STATES TREASURY	2019 FORM 1041-ES		-1,400.00
	6340-INSURANCE EXPENSE					-1,703.00
9/20/2019	REGIONS LHWD 02326...	1282	... GALLAGHER	INV 1000000/3156394		-1,705.00
				OVERALL TOTAL		-3,103.00

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - JULY 2019**

<u>Receivership Management, Inc.</u>	
July 2019 Fees & Overhead Exp.	\$826.50
July 2019 Expenses	\$34.90
<u>Everett Sinor</u>	
July 2019 Fees & Expenses	<u>\$1,479.35</u>
Proposed Payment out of Receivership Estate	\$2,340.75
<u>Graham Matherne</u>	
July 2019 Fees & Expenses	<u>\$1,296.00</u>
Proposed Interim Taxation of Costs	\$1,296.00



Receivership Management, Inc.
 510 Hospital Drive, Suite 490
 Madison, TN 37115

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		July 2019			
7/1/2019	Jere P. Cowan	EMAIL FROM E SINOR SENDING EXPENSE STATEMENT	0.1	\$79.00	\$7.90
7/1/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL X2	0.2	\$79.00	\$15.80
7/1/2019	Lauren B. Garcia	EMAILS FROM E. SINOR REQUESTING FINAL UTILITIES INVOICE	0.1	\$61.00	\$6.10
7/2/2019	Lauren B. Garcia	PROCESS MAIL, SCAN FINANCIALS TO J.LAWSON, UPDATE RECON SPREADSHEET, EMAIL TO L.COOPER REQUESTING TWO BANK STATEMENTS	0.2	\$61.00	\$12.20
7/2/2019	Lauren B. Garcia	RECORD JUNE AND JULY DEPOSITS. RECONCILE ACCT THRU JUNE 2019, PREPARE CASH FLOW AND REGISTER REPORT, FORWARD TO E.SINOR FOR REVIEW	0.3	\$79.00	\$23.70
7/3/2019	Jere P. Cowan	RECEIPT, POST AND PREPARE EXPENSE PAYMENTS; FORWARD TO R MOORE FOR APPROVAL; FORWARD SAME	0.7	\$79.00	\$55.30
7/8/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL, RECEIPT OF VEC BILL, AND REFUND CHECK, SCAN J.LAWSON AND E.SINOR AND FORWARD TO J.COWAN FOR DEPOSIT	0.2	\$79.00	\$15.80
7/9/2019	Lauren B. Garcia	EMAIL FROM E.SINOR REQUESTING JUNE FINANCIALS, REPLY RE SUCH, EMAIL FROM E.SINOR RE VEC CREDIT ADJ. ON VEC BILL, REPLY RE SUCH	0.1	\$61.00	\$6.10
7/10/2019	Lauren B. Garcia	CALL TO VEC TO INQUIRE ABOUT CREDIT AND REFUND - EMAIL E.SINOR AND J.LAWSON RE SUCH	0.1	\$61.00	\$6.10
7/10/2019	Lauren B. Garcia	EMAIL FROM E.SINOR RE ACCTS PAYABLE THRU CURRENT, RUN AND REVIEW REGISTER REPORT AND FORWARD, EMAIL FROM E.SINOR RE VEC REFUND FOR JULY 2 PAYMENT	0.3	\$79.00	\$23.70

LAUREL HILLS WATER DISTRICT **July 2019**

Date	Name	Description	Hours	Rate	Total
7/1/2019	Jere P. Cowan	RECEIPT FUNDS FROM VEC; CONFERENCE WITH R MOORE RE: SAME; POST AND UPDATE FINANCIAL RECORDS; PREPARE MATERIALS FOR REGIONS	0.6	\$65.00	\$39.00
7/11/2019	Lauren B. Garcia	PREPARE RMI EXPENSE RECOVERABLE, FINALIZE AND REVIEW JUNE FINANCIALS, SCAN AND EMAIL TO E.SINOR	0.3	\$79.00	\$23.70
7/11/2019	Robert E. Moore, Jr.	MEETING WITH E.SINOR RE: TAX DISCUSSION, CLOSE OUT OF ESTATE, REMAINING ITEMS WITH A.CONKLIN .25; REVIEW AND APPROVE REPORT .25	0.5	\$153.00	\$76.50
7/12/2019	Jere P. Cowan	TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNT	0.6	\$65.00	\$39.00
7/12/2019	Jere P. Cowan	FINALIZE R MOORE AFFIDAVIT; FORWARD TO E SINOR FOR REPORT	0.3	\$65.00	\$19.50
7/15/2019	Lauren B. Garcia	CALL FROM GERALD FROM C.N.A. REQUESTING AUDIT INFORMATION, EMAIL TO E.SINOR RE SUCH, RECEIPT OF VEC REFUND, SCAN TO FILE AND EMAIL TO ESINOR AND J.LAWSON, FORWARD TO J.COWAN FOR DEPOSIT	0.3	\$61.00	\$18.30
7/17/2019	Lauren B. Garcia	SEVERAL EMAILS FROM E.SINOR AND M.HARGIS RE AUDIT ISSUE, EMAIL FROM G. BAGGAY RE AUDIT REQUEST, FORWARD MICROBAC BILL TO J.COWAN FOR IMMEDIATE PAYMENT	0.3	\$61.00	\$18.30
7/17/2019	Robert E. Moore, Jr.	EMAILS TO AND FROM E.SINOR AND G.WILLIAMS RE: INVOICES AND TESTS FROM MICROBAC .2	0.2	\$153.00	\$30.60
7/18/2019	Jere P. Cowan	RECEIPT AND PROCESSING OF EXPENSE STATEMENT; FORWARD TO RMOORE FOR APPROVAL; FORWARD SAME; RECEIPT OF FUNDS FROM VEC FOR INACTIVE REFUND; POST AND UPDATE FINANCIAL RECORDS; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS RE: SAME; CONFERENCE WITH R MOORE RE: SAME	1	\$79.00	\$79.00
7/29/2019	Jacqui D. Lawson	TRANSFER FUNDS; POST TRANSACTION, APPROVE CONTRACT LABOR; VERIFY BUDGET FOR 2019; DISCUSSION W/ JCOWAN & RMOORE CLOSING RECEIVERSHIP;	2	\$79.00	\$158.00
7/29/2019	Jere P. Cowan	MEETING WITH R MOORE AND J LAWSON RE: CLOSING RECEIVERSHIP AND STATUS	0.4	\$65.00	\$26.00
7/31/2019	Jacqui D. Lawson	STATUS UPDATE; ANALYZE QUICKEN; SETUP TRIAL BALANCE: (1.0)	1	\$79.00	\$79.00
7/31/2019	Jere P. Cowan	RECEIPT EXPENSE INFO FROM J LAWSON; REVIEW, POST AND PROCESS EXPENSE PAYMENTS FOR SAME;	0.4	\$79.00	\$31.60

LAUREL HILLS WATER DISTRICT

July 2019

7/31/2019	Robert E. Moore, Jr.	EMAILS TO E.SINOR RE: PAYMENTS AND GL INSURANCE TERMINATION .10	0.1	\$153.00	\$15.30
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Total

\$826.50

**G. Everett Sinor, Jr.
Attorney at Law**

August 7, 2019

Receivership Management, Inc.
Attn: Mr. Robert E. Moore, Jr.
President
510 Hospital Drive, Suite 490
Madison, Tennessee 37115

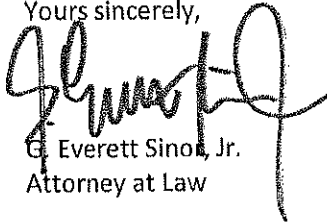
RE: July 2019 Billings – RMI/Laurel Hills Water System in Receivership

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

Please find enclosed herewith my billings for the previous month on the matter referenced above. If you have any questions about this bill, please do not hesitate to contact me.

Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
7/1/2019	Email from Heather w L&S re billings and response; T.C. w E Bolin re transition issues; T.C. w A Conklin re transition issues; email from E Bolin & response; email from G Williams & response; emails from E Bolin; email to R Moore re insurance; T.C. w Heather w L&S	0.7		
7/2/2019	Email from L Garcia re COUD bill and response; email from L Garcia re insurance bill & response; email from L&S re taxes; email from E Bolin re addresses for customers and response; email from R Moore re Gallagher invoice	0.4		
7/8/2019	review G Matherne invoice; T.C. w G Matherne re order; email from L Garcia re VEC bill & response; email from G Matherne re order	0.2		
7/9/2019	Work on 32d report; email to R Moore re same	2.2		
7/10/2019	Email from T Stephens re retainer agreement; T.C. w G Williams re LHWS; Email from G Matherne re materials to be delivered to the COUD & response; email from L &S re A/R summary & response; T.C. w E Bolin re records and customers checks; email to Heather w L&S re same; T.C. w E Bolin re same; Email from L Garcia re VEC bill; complete 6/30 financials; email to T Stephens re taxes; email to L Garcia re bills; email from L Garcia on VEC and other bills	1.8		
7/11/2019	work on 32d report; discussion w R Moore on winddown items; email to R Moore re same	1.3		
7/12/2019	email to K Cashman-Grams w 32d report; T.C. w G Williams re Microbac bill; email to T Stephens re termination of contract; email to J Lawson & L Garcia re Microbac bill; numerous calls to TDEC; call to D Phillips w TDEC re transfer of LHWS; email from T Stephens re taxes & response	1.0		
7/15/2019	Email from A Conklin w report and signatures; email from L Garcia re audit and forward to AJG	0.2		
7/16/2019	Email from E Lawless re affidavit and response; email from M Hargis w AJG re audit and forward same to R Moore, J Lawson & L Garcia	0.1		
7/17/2019	finalization of 32d report; email to cc list for report; email from R Moore on insurance audit and response; email to M Hargis w AJG re same; email to J Lawson & L Garcia re TDEC pre-payment; Email from R Moore re microbac bill and response; email from M Hargis w AJG; forward same to R Moore	1.1		

7/26/2019	review insurance email from AJG; forward same to R Moore, L Garcia & J Lawson; email to A Conklin requesting update on signatures	0.1		
7/30/2019	Review A Conklin email re signatures and filing & G Matherne response	0.1		
7/31/2019	email to G Matherne re final clean up items; T.C. w R Moore re taxes and closing estate; emails from J Lawson & M Hargis re insurance; email to M Hargis re cancelling GL policy; email from A Conklin re dismissal of TPUC's petition; review R Moore emails re estate	<u>0.8</u>		
	Hourly Billing Total	10.0	\$140.00	\$1,400.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
7/17/2019	Postage for 32d Receiver's Report	\$79.35		
	Other Expenses Reimburseable Total			<u>\$79.35</u>
	Balance Owed this month			\$1,479.35
	Previous Balance Owed		\$0.00	
	Total Amount Due and Payable			\$1,479.35

Please remit payment to: Everett Sinor, 3504 Robin Road, Nashville, Tennessee 37204

The UPS Store - #3355
101 Creekside Crossing
Suite 1700
Brentwood, TN 37027
(615) 377-8100

07/17/19 01:20 PM

We are the one stop for all your
shipping, postal and business



01	008299 (022)	Meter Mail	TO \$	8.45
		Tracking# 9400110200793115709922		
02	008299 (022)	Meter Mail	TO \$	8.45
		Tracking# 9400110200882085752066		
03	008299 (022)	Meter Mail	TO \$	8.52
		Tracking# 9400110200829085598591		
04	008299 (022)	Meter Mail	TO \$	8.52
		Tracking# 9400110200793115714445		
05	008299 (022)	Meter Mail	TO \$	8.45
		Tracking# 9400110200881085652970		
06	008299 (022)	Meter Mail	TO \$	8.52
		Tracking# 9400110200830298576870		
07	001040 (001)	Ground Commercial	TO \$	13.29
		Tracking# 1Z303Y3Y0386007933		
08	001045 (001)	Ground Residential	TO \$	12.12
		Tracking# 1Z303Y3Y9019341856		
09	020587 (002)	12x9x3 Box	T1 \$	2.75

SubTotal \$ 79.07
State and County Tax (T1) \$ 0.28
Total \$ 79.35

MASTERCARD \$ 79.35
ACCOUNT NUMBER * *****6943
Appr Code: 01706Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 000008000
TSI: E800
AC: 57D73F243AF565AD
ARC: 00

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

AUGUST 6, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1084228

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH JULY 31, 2019

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$1,296.00
TOTAL THIS INVOICE	\$1,296.00
PREVIOUSLY BILLED AND OUTSTANDING	\$9,450.00
TOTAL AMOUNT DUE	\$10,746.00

DUE UPON RECEIPT
TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE RETURN THIS
REMITTANCE ADVICE WITH YOUR PAYMENT

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

AUGUST 6, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1084228

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH JULY 31, 2019

07/01/19	E-MAIL FROM A. CONKLIN REGARDING STATUS AS TO CLOSING ON GSA ISSUES/SIGNATURES/ETC. J. GRAHAM MATHERNE .10 hours at 270.00 per hour.	27.00
07/08/19	TELEPHONE CONFERENCE WITH CIRCUIT COURT CLERK REGARDING BILL OF COST AND DISMISSAL ORDER IN CONDEMNATION ACTION (.20); REVIEW OF SAME (.10); TELEPHONE CONFERENCE WITH E. SINOR REGARDING STATUS MATTERS (.10); E-MAIL BILL OF COSTS (\$ 0) /ORDER TO R. MOORE AND E. SINOR (.10). J. GRAHAM MATHERNE .50 hours at 270.00 per hour.	135.00
07/10/19	REVIEW ENTIRE CASE FILE TO IDENTIFY MATERIAL NEEDED TO TURN OVER TO COUD (.50); E-MAIL TO E. SINOR AND R. MOORE REGARDING SAME (.30). J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00
07/17/19	E-MAIL FROM SINOR REGARDING MONTHLY REPORT (.10); REVIEW OF SAME (.30). J. GRAHAM MATHERNE .40 hours at 270.00 per hour.	108.00
07/29/19	REVIEW COURT ORDER REGARDING RECEIVER REPORT AND GRANT OF FEES. J. GRAHAM MATHERNE .10 hours at 270.00 per hour.	27.00

CONTINUE NEXT PAGE

RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1084228

07/30/19 E-MAIL FROM A. CONKLIN REGARDING FINAL AND FULLY EXECUTED GSA AND RELATED MATTERS (.10); REVIEW OF SAME (.10); REVIEW OF MATERIAL REGARDING DISCHARGE MOTION (.20); E-MAIL WITH SINOR REGARDING SAME (.10).
J. GRAHAM MATHERNE .50 hours at 270.00 per hour. 135.00

07/31/19 E-MAILS WITH E. SINOR AND R. MOORE REGARDING STATUS ISSUES (.30); REVIEW E-MAILS AND ATTACHMENTS FROM A. CONKLIN REGARDING DISMISSAL OF RMI PETITION FOR PROVISIONAL CCN (.50); REVIEW E-MAILS AND ATTACHMENTS FROM A CONKLIN REGARDING TPUC REQUEST FOR CLOSURE OF LAUREL HILL TPUC DOCUMENT (#12-00030) AND CROSS-REFERENCE EXHIBITS THERETO AND REVIEW FILES REGARDING RMI SIGNATURES (1.20); OUTLINE OF MATTERS TO COVER WITH R. MOORE AND E. SINOR REGARDING SAME (.40).
J. GRAHAM MATHERNE 2.40 hours at 270.00 per hour. 648.00

TOTAL SERVICES 4.80 \$1,296.00

TOTAL THIS INVOICE \$1,296.00

PREVIOUSLY BILLED AND OUTSTANDING \$9,450.00

TOTAL AMOUNT DUE \$10,746.00

-----TIME AND FEE SUMMARY-----

*-----	TIMEKEEPER	RATE	HOURS	FEE
J MATHERNE	PARTNER	270.00	4.80	1296.00

RMI EXP RECOVERABLE LHWd - Jul 2019
7/1/2019 through 7/31/2019

Category	7/1/2019- 7/31/2019	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-122.40	-122.40
5610-CONTRACT LABOR RMI	-704.10	-704.10
TOTAL 5100 FEES RMI	-826.50	-826.50
5150 FEES LEGAL		
5400-LEGAL FEES	-2,775.35	-2,775.35
TOTAL 5150 FEES LEGAL	-2,775.35	-2,775.35
5300 EXPENSE		
6060-RENT	0.00	0.00
6205-COPIES	-19.40	-19.40
6210-POSTAGE	-3.50	-3.50
6222-TELEPHONE LONG DISTANCE	-12.00	-12.00
TOTAL 5300 EXPENSE	-34.90	-34.90
OVERALL TOTAL	-3,636.75	-3,636.75

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - AUGUST 2019**

Receivership Management, Inc.

August 2019 Fees & Overhead Exp.	\$636.70
August 2019 Expenses	\$1.60

Everett Sinor

August 2019 Fees & Expenses	<u>\$588.00</u>
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Proposed Payment out of Receivership Estate	\$1,226.30
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Graham Matherne

August 2019 Fees & Expenses	<u>\$783.00</u>
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Proposed Interim Taxation of Costs	\$783.00
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Receivership Management, Inc.
 510 Hospital Drive, Suite 490
 Madison, TN 37115

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT				August 2019	
8/1/2019	Robert E. Moore, Jr.	EMAIL TO E.SINOR RE: ONGOING ISSUES ON TAX REPORTING, DISCUSSION OF SAME 2	0.2	\$153.00	\$30.60
8/2/2019	Lauren B. Garcia	3 EMAILS FROM E.SINOR RE INSURANCE POLICY AND AUDIT	0.2	\$61.00	\$12.20
8/5/2019	Jacqui D. Lawson	EMAILS FROM E. SINOR; REVIEW & RESPOND	0.2	\$79.00	\$15.80
8/5/2019	Jere P. Cowan	RECEIPT EXPENSE PAYMENT FOR PROCESSING; POST PAYMENT AND FORWARD TO R MOORE FOR APPROVAL; FORWARD SAME	0.4	\$79.00	\$31.60
8/5/2019	Lauren B. Garcia	EMAIL FROM E.SINOR RE OUTSTANDING INVOICE, REVIEW FINANCIALS AND REPLY, FORWARD INVOICE TO J.COWAN FOR IMMEDIATE PAYMENT, RECEIPT OF COUD BILL, SCAN TO ESINOR RE PAYMENT PROCEDURE	0.3	\$79.00	\$23.70
8/6/2019	Jacqui D. Lawson	REVIEW WYATT INVOICE	0.2	\$79.00	\$15.80
8/6/2019	Lauren B. Garcia	CONVERSATION WITH E.SINOR RE JULY EXPENSES, FORWARD REQUESTED BILLS	0.1	\$79.00	\$7.90
8/6/2019	Lauren B. Garcia	EMAIL TO E.SINOR FOLLOWING UP COUD FINAL BILL	0.1	\$61.00	\$6.10
8/6/2019	Robert E. Moore, Jr.	REVIEW AND GRANT PERMISSION TO SIGN GSA AGREED ORDER .10	0.1	\$153.00	\$15.30
8/7/2019	Jacqui D. Lawson	SEVERAL EMAILS FROM E. SINOR & RMOORE REVIEW & RESPOND WHEN NEEDED	0.5	\$79.00	\$39.50
8/7/2019	Lauren B. Garcia	RECONCILE BANK ACCOUNT THRU JULY 2019, POST FEE AND EXPENSE ACCRUALS	0.4	\$79.00	\$31.60
8/7/2019	Lauren B. Garcia	EMAIL FROM E.SINOR RE TDEC INVOICE, REPLY	0.1	\$61.00	\$6.10
8/7/2019	Robert E. Moore, Jr.	CONTINUED DISCUSSIONS ON IRS TAX ISSUES WITH E.SINOR .3	0.3	\$153.00	\$45.90

LAUREL HILLS WATER DISTRICT

August 2019

Date	Name	Description	Hours	Amount	Total
8/9/2019	Jere P. Cowan	RECEIPT, POST AND PAYMENT OF UTILITY INVOICE; FORWARD TO R MOORE FOR APPROVAL; FORWARD SAME	0.4	\$79.00	\$31.60
8/9/2019	Lauren B. Garcia	EMAIL FROM R. MOORE RE LHWD REPORTS NEEDED FOR WEBSITE, PULL 2019 REPORTS	0.3	\$61.00	\$18.30
8/12/2019	Lauren B. Garcia	NUMEROUS EMAILS FROM E. SINOR ATTACHING DOCUMENTS FOR POSTING TO WEB, SCAN, GATHER ORGANIZE FEE REPORTS AND MOTIONS FROM 18TH-32ND FILINGS - FORWARD TO JCOWAN TO POST TO WEB	1.3	\$61.00	\$79.30
8/21/2019	Jere P. Cowan	PREPARATION OF EXPENSE STATEMENT FOR E SINOR	0.2	\$79.00	\$15.80
8/21/2019	Lauren B. Garcia	PREPARE JULY 2019 FINANCIALS FOR REVIEW AND FORWARD TO E.SINOR	0.5	\$79.00	\$39.50
8/22/2019	Jacqui D. Lawson	REVIEW SEVERAL EMAILS FROM E. SINOR & CAN INSURANCE; JULY FEE FILING & FINANCIALS	0.5	\$79.00	\$39.50
8/22/2019	Jere P. Cowan	EMAILS RE: WEB UPDATE	0.1	\$65.00	\$6.50
8/22/2019	Lauren B. Garcia	REQUEST FORM E.SINOR FOR AUGUST CASH RECEIPTS THRU CURRENT, FORWARD REQUEST, EMAIL REQUEST FROM E.SINOR RE JUNE FINANCIALS AND JUNE CASH FLOW STMT RE. - REVIEW ACCOUNTING RECORDS AND REQUEST FOR CHECK BACKUP TO JCOWAN, EMAILS RE CNA REFUND AND INVOICE FOR AJG, EMAIL, TO E.SINOR REQUESTING RE NEED FOR ADDRESS UPDATE FOR CNA REFUND	0.9	\$79.00	\$71.10
8/22/2019	Robert E. Moore, Jr.	EMAILS TO AND FROM E.SINOR AND J.COWAN RE: WEBSITE REPORTS .10	0.1	\$153.00	\$15.30
8/23/2019	Lauren B. Garcia	EMAIL REVIEW CHECK AND BACKUP, REPLY TO EMAIL FROM E.SINOR RE JULY CASH FLOW EXPENSE, EMAIL TO J.LAWSON TO REQUEST TRANSFER	0.2	\$79.00	\$15.80
8/27/2019	Lauren B. Garcia	REQUEST BANK TRANSFER FROM L. COOPER	0.1	\$61.00	\$6.10
8/28/2019	Jacqui D. Lawson	REVIEW EMAILS FROM E. SINOR	0.2	\$79.00	\$15.80
Total					\$636.70

**G. Everett Sinor, Jr.
Attorney at Law**

September 4, 2019

Receivership Management, Inc.
Attn: Mr. Robert E. Moore, Jr.
President
510 Hospital Drive, Suite 490
Madison, Tennessee 37115

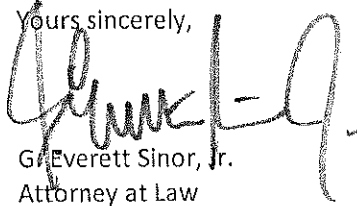
RE: August 2019 Billings – RMI/Laurel Hills Water System in Receivership

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

Please find enclosed herewith my billings for the previous month on the matter referenced above. If you have any questions about this bill, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "G. Everett Sinor, Jr.", with a stylized flourish at the end.

G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
8/1/2019	Email from Stephen Murphree @ CNA re cancellation; email from R Moore re taxes & response; email to T Stephens re same	0.2		
8/5/2019	Emails to L Garcia re bills; T.C. w A Conklin re closing docket; email re same	0.1		
8/6/2019	Email from G Williams re bill & response; review G Matherne bill; review docket dismissal on LHCPOA CCN petition; email to R Moore & G Matherne agreed order or dismissing CCN petition; T.C. w L Garcia re payments; review T Stephens email re taxes & response; email from R Moore re LHWS	0.6		
8/7/2019	Email from G Williams re bill; email from T Stephens re taxes & response; email from A Conklin w CCN petition & order; sign and scan order back to A Conklin; email to R Moore, J Lawson & L Garcia re taxes; review A Conklin email re closing of TPUC dockets; email to L Garcia re TDEC invoice; review L Garcia email re TDEC invoice	0.3		
8/12/2019	T.C. w L Garcia re website and docs to provide re LHWS; T.C. to A Levondosky re docket call	0.8		
8/13/2019	Exchange of emails w A Conklin & D Whitaker re docket call	0.1		
8/20/2019	Email to CNA & AJG re insurance; forward same to R Moore, L Garcia & J Lawson	0.1		
8/21/2019	Email from M Hargis re insurance & response; review email from L Garcia re docs for financials; prep of July 2019 financials	1.4		
8/22/2019	Email from L Garcia re address for CNA individual check; email to CNA re same; review email from L Garcia w August disbursements	0.2		
8/23/2019	Email from L Garcia re ct reporter bill & response	0.1		
8/26/2019	Email from J Lawson re ct reporter's bill	0.1		
8/28/2019	Email from A Conklin re final docs; email to CNA & AJG re insurance; forward same to L Garcia, J Lawson & R Moore	<u>0.2</u>		
	Hourly Billing Total	4.2	\$140.00	\$588.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00

Other Expenses Reimburseable Total		<u>\$0.00</u>
Balance Owed this month		\$588.00
Previous Balance Owed	\$1,479.35	
Total Amount Due and Payable		\$2,067.35

Please remit payment to: Everett Sinor, 3504 Robin Road, Nashville, Tennessee 37204

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

SEPTEMBER 6, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1085769

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2019

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$783.00

TOTAL THIS INVOICE	\$783.00

PREVIOUSLY BILLED AND OUTSTANDING	\$10,746.00

TOTAL AMOUNT DUE	\$11,529.00
	=====

DUE UPON RECEIPT
TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE RETURN THIS
REMITTANCE ADVICE WITH YOUR PAYMENT

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

SEPTEMBER 6, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1085769

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2019

08/01/19 E-MAIL TO R. MOORE AND E. SINOR REGARDING
REVIEW OF DRAFT FILING TO CLOSE PROVISIONAL CCN
PETITION (.20); FURTHER REVIEW OF TPUC STAFF
FILING REGARDING CLOSURE OF TPUC ACTION AND
EXAMINE EXHIBITS AND ISSUES REGARDING TITLE
COMMITMENT (1.00); E-MAIL TO MOORE AND SINOR
REGARDING SAME (.50); REVIEW E-MAIL CHECK LIST
FROM A . CONKLIN (.10); E-MAILS WITH SINOR
REGARDING DRAFT OF FILING REGARDING DISMISSAL
OF PROVISIONAL CCN PETITION (.20).
J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

08/06/19 E-MAILS FROM E. SINOR AND R. MOORE REGARDING
CONKLIN EDITS TO ORDERS OF DISMISSAL AND
REQUEST TO SIGN ON BEHALF OF RECEIVER.
J. GRAHAM MATHERNE .20 hours at 270.00 per hour. 54.00

08/07/19 E-MAILS FROM E. SINOR AND A. CONKLIN REGARDING
SUBMISSION OF VARIOUS DISMISSAL ORDERS IN TPUC
PROCEEDINGS (.30); REVIEW OF SAME (.20).
J. GRAHAM MATHERNE .50 hours at 270.00 per hour. 135.00

CONTINUE NEXT PAGE

RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1085769

Sep 6, 2019
PAGE 3

08/08/19 REVIEW SIGNED DISMISSAL ORDERS IN TPUC MATTERS
AND E-MAIL FROM CONKLIN REGARDING SAME (.10);
REVIEW CHECKLIST FROM CONKLIN (.10).
J. GRAHAM MATHERNE .20 hours at 270.00 per hour. 54.00

TOTAL SERVICES 2.90 \$783.00

TOTAL THIS INVOICE \$783.00

PREVIOUSLY BILLED AND OUTSTANDING \$10,746.00

TOTAL AMOUNT DUE \$11,529.00

-----TIME AND FEE SUMMARY-----

-----TIMEKEEPER-----	RATE	HOURS	FEE
J MATHERNE PARTNER	270.00	2.90	783.00

RMI EXP RECOVERABLE LHWD - Aug 2019
8/1/2019 through 8/31/2019

Category	8/1/2019- 8/31/2019	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-107.10	-107.10
5610-CONTRACT LABOR RMI	-529.60	-529.60
TOTAL 5100 FEES RMI	-636.70	-636.70
5150 FEES LEGAL		
5400-LEGAL FEES	-1,371.00	-1,371.00
TOTAL 5150 FEES LEGAL	-1,371.00	-1,371.00
5300 EXPENSE		
6060-RENT	0.00	0.00
6205-COPIES	-0.60	-0.60
6210-POSTAGE	-1.00	-1.00
TOTAL 5300 EXPENSE	-1.50	-1.50
OVERALL TOTAL	-2,009.30	-2,009.30

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - SEPTEMBER 2019**

<u>Receivership Management, Inc.</u>	
September 2019 Fees & Overhead Exp.	\$206.60
September 2019 Expenses	\$1.00
<u>Everett Sinor</u>	
September 2019 Fees & Expenses	<u>\$168.00</u>
Proposed Payment out of Receivership Estate	\$375.60
<u>Graham Matherne</u>	
September 2019 Fees & Expenses	<u>\$135.00</u>
Proposed Interim Taxation of Costs	\$135.00

Receivership Management, Inc.
 510 Hospital Drive, Suite 490
 Madison, TN 37115

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **September 2019**

Date	Person	Description	Hours	Rate	Total
9/4/2019	Jacqui D. Lawson	PRINT BANK STMTS; RECONCILE ACCOUNT. EMAIL E. SINOR SAME	0.3	\$79.00	\$23.70
9/5/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
9/5/2019	Lauren B. Garcia	EMAIL FROM E. SINOR RE STATUS OF C.N.A. REFUND. EMAIL FROM GALLAGHER RE SUCH	0.1	\$61.00	\$6.10
9/6/2019	Jacqui D. Lawson	REVIEW GMATHERN INVOICE (-10) REVIEW & RESPOND TO EMAILS (-10)	0.2	\$79.00	\$15.80
9/6/2019	Robert E. Moore, Jr.	QUESTIONS RE: STATUS ON INVOICE .10	0.1	\$153.00	\$15.30
9/9/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL, PREPARE CHECK TO US TREASURY	0.3	\$79.00	\$23.70
9/10/2019	Lauren B. Garcia	MAIL AND FILE CHECK BACK UP	0.1	\$61.00	\$6.10
9/11/2019	Robert E. Moore, Jr.	EMAIL TO E.SINOR RE: TAX MATTER. DISMISSALS .10	0.1	\$153.00	\$15.30
9/13/2019	Robert E. Moore, Jr.	CALL TO E.SINOR RE: TAX MATTER. DISMISSALS .10	0.1	\$153.00	\$15.30
9/17/2019	Lauren B. Garcia	EMAIL FROM E.SINOR RE FOLLOW-UP ON GALLAGHER RETURN OF PREMIUM AND INVOICE	0.1	\$61.00	\$6.10
9/18/2019	Robert E. Moore, Jr.	REVIEW AND APPROVE INSURANCE FINAL INVOICE AND PAYMENT .10	0.1	\$153.00	\$15.30
9/19/2019	Lauren B. Garcia	CALL TO GALLAGHER TO CONFIRM PAYMENT AMOUNT DUE	0.2	\$61.00	\$12.20
9/20/2019	Lauren B. Garcia	PREPARE AUGUST FINANCIALS INCLUDING RMI EXPENSE RECOVERABLE, RECEIPTS/DISBURSEMENTS, REGISTER REPORT AND AUGUST INVOICES - EMAIL TO E. SINOR	0.4	\$79.00	\$31.60

LAUREL HILLS WATER DISTRICT

September 2019

9/20/2019	Lauren B. Garcia	STUFF AND METER CHECK, FILE BACK-UP, CALL AND EMAIL TO KELLY AT GALLAGHER RE O/S INVOICE	0.2	\$61.00	\$12.20
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Total **\$206.60**

G. Everett Sinor, Jr.
Attorney at Law

October 3, 2019

Receivership Management, Inc.
Attn: Mr. Robert E. Moore, Jr.
President
510 Hospital Drive, Suite 490
Madison, Tennessee 37115

RE: September 2019 Billings – RMI/Laurel Hills Water System in Receivership

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

Please find enclosed herewith my billings for the previous month on the matter referenced above. If you have any questions about this bill, please do not hesitate to contact me.

Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
9/4/2019	Email to AJG & CNA Insurance re insurance; email to K Watston & AJG re same	0.1		
9/5/2019	Email from K Watson @ AJG & response	0.1		
9/11/2019	Email from A Conklin re items to complete deal; forward to R Moore & G Matherne w comments; email from A Conklin re resolution required by title insurance company; forward same to R Moore w comment	0.2		
9/12/2019	Email from R Moore re resolution; email to A Conklin re same; review GSA re chancery order requirement; review of memorandum from accounting firm re tax statute of limitations and other research issues; email to R Moore re same	0.4		
9/13/2019	T.C. w R Moore re LHWS issues	0.1		
9/17/2019	Email to K Watson re insurance	0.1		
9/18/2019	Email from K Watson re insurance; forward same to J Lawson, R Moore & L Garcia; email to L Garcia & J Lawson & R Moore re future plan for estate	<u>0.2</u>		
	Hourly Billing Total	1.2	\$140.00	\$168.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$168.00
	Previous Balance Owed		\$2,067.35	
	Total Amount Due and Payable			\$2,235.35

Please remit payment to: Everett Sinor, 3504 Robin Road, Nashville, Tennessee 37204

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

OCTOBER 3, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1087457

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2019

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$135.00

TOTAL THIS INVOICE	\$135.00

PREVIOUSLY BILLED AND OUTSTANDING	\$11,529.00

TOTAL AMOUNT DUE	\$11,664.00
	=====

DUE UPON RECEIPT
TO INSURE PROPER CREDIT TO YOUR ACCOUNT PLEASE RETURN THIS
REMITTANCE ADVICE WITH YOUR PAYMENT

WYATT, TARRANT & COMBS, LLP
333 COMMERCE STREET
SUITE 1400
NASHVILLE, TENNESSEE 37201
F.E.I. # 61-0468003
(615) 244-0020

OCTOBER 3, 2019
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1087457

RECEIVERSHIP MANAGEMENT, INC.
C/O ROBERT E. MOORE, JR.
510 HOSPITAL DRIVE, SUITE 490
MADISON, TN 37115

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH SEPTEMBER 30, 2019

09/11/19 REVIEW E-MAILS AMONGST COUNSEL REGARDING
RESOLUTIONS NEEDED BY TITLE AGENT AND REGARDING
FINAL CHECKLIST, ETC. (.40).
J. GRAHAM MATHERNE .40 hours at 270.00 per hour. 108.00

09/12/19 TELEPHONE CONFERENCE WITH R. MOORE REGARDING
E-MAILS BETWEEN SINOR AND A. CONKLIN (.10).
J. GRAHAM MATHERNE .10 hours at 270.00 per hour. 27.00

TOTAL SERVICES	0.50	\$135.00
TOTAL THIS INVOICE		\$135.00
PREVIOUSLY BILLED AND OUTSTANDING		\$11,529.00
TOTAL AMOUNT DUE		\$11,664.00

CONTINUE NEXT PAGE

RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1087457

Oct 3, 2019
PAGE 3

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEE
J MATHERNE PARTNER	270.00	.50	135.00

RMI EXP RECOVERABLE LHWD - Sep 2019
9/1/2019 through 9/30/2019

Category	9/1/2019- 9/30/2019	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-61.20	-61.20
5610-CONTRACT LABOR RMI	-145.40	-145.40
TOTAL 5100 FEES RMI	-206.60	-206.60
5150 FEES LEGAL		
5400-LEGAL FEES	-303.00	-303.00
TOTAL 5150 FEES LEGAL	-303.00	-303.00
5300 EXPENSE		
6060-RENT	0.00	0.00
6210-POSTAGE	1.00	1.00
TOTAL 5300 EXPENSE	1.00	1.00
OVERALL TOTAL	-510.60	-510.60

IN THE CHANCERY COURT OF CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

COMES NOW, Kelly Cashman-Grams, after being duly sworn, state as follows:

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval and Authorization of Payment of Fees and Expenses, and Interim Taxation of Costs.

2. I am the General Counsel for the Tennessee Public Utility Commission in this matter. Pursuant to Tennessee law, the Tennessee Public Utility Commission took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.



3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of July 1, 2019 through September 30, 2019, that are contained in this filing.

4. Based on my personal review, and the recommendations of my staff, I have determined that the rates being charged by the Receiver for the services provided are either at a discounted or market rate for the area.

5. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses presented by the Receiver, and I have determined that all of the fees charged are fair, reasonable and proper for the services provided and that they are necessary costs of this Receivership. The invoices for fees and expenses attached as exhibits to the Receiver's Motion note the work performed, the amount charged and the person performing the work. No billings were excessive or duplicative.

6. Furthermore, either I, or my staff at my direction, have reviewed the fees and expenses for outside contractees, and, based upon this review and the recommendations of the Receiver, I have determined that both the rate and the amount of those fees and expenses are fair, reasonable and proper for the services provided.

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7. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court (a) authorize payment to the Receiver out of receivership estate assets as requested by the Receiver; and (b) order payment of fees and expenses as an interim taxation of costs in this matter as requested by the Receiver.

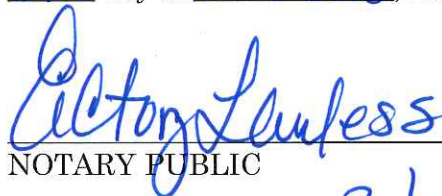
FURTHER THE AFFIANT SAITH NOT.



KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

31st day of October, 2019



NOTARY PUBLIC

My commission expires: 3/8/2020



IN THE CHANCERY COURT OF CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

COMES NOW, Robert E. Moore, Jr., after being duly sworn, state as follows:

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval and Authorization of Payment of Fees and Expenses and Interim Taxation of Costs.

2. I am the President of Receivership Management, Inc., the Receiver appointed in this action by the Court at the request of the Tennessee Public Utility Commission. In that capacity, I have reviewed and approved the administration of the Laurel Hills Water System ("LHWS") from the date of the Order Appointing Receiver entered by this Court on October 26, 2015.

3. The Receiver has filed a Motion for approval of fees and expenses in the LHWS Receivership. The Receiver's Motion seeks approval of the amount of fees and

EXHIBIT
F

expenses incurred for the period of time between July 1, 2019 and September 30, 2019 that are contained in the Receiver's motion.


4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide services on this receivership. The fees and expenses were necessary for the work provided and are not duplicative or excessive. I believe the fees presented for approval are fair, reasonable and proper for the services provided. I have also determined that the rates charged by these individuals for the services provided are either at a discounted or market rate for their area.

5. Therefore, I believe that all fees and expenses presented for approval contained in this filing are fair, reasonable and proper for the necessary services provided.

[intentionally blank]


6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the fees and expense for J. Graham Matherne, Esq. Accordingly, and pursuant to the Court's Amended Order Appointing Receiver, it is requested that the Court approve payment to the Receiver out of the assets of the Laurel Hills Water System in Receivership in the amount of \$3942.65 (i.e., the amount of all fees and expenses set forth in the Receiver's Motion, save fees and expenses attributable to Mr. Matherne), and that the Court order an interim taxation of costs to the Tennessee Regulatory Authority in the amount of \$2214.00 (i.e., the amount of fees and expenses attributable to Mr. Matherne set forth in the Receiver's Motion).

FURTHER THE AFFIANT SAITH NOT.


ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

26th day of October, 2019.


Notary Public

Commission Expires: **My Commission Expires:**
Oct. May 29, 2023



IN THE CHANCERY COURT FOR CUMBERLAND COUNTY, TENNESSEE
THIRTEENTH JUDICIAL DISTRICT, AT CROSSVILLE

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

ORDER GRANTING RECEIVER'S MOTION

On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the ____ day of November, 2019, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for July, August and September of 2019, and approve payment to the Receiver of a portion of such fees and expenses out of receivership estate assets, and tax costs on an interim basis to the Authority for a portion of such fees and expenses.

The Receiver's motion being well taken, and no opposition being filed with this Honorable Court within ten (10) calendar days of the filing date of the Receiver's motion, it is **ORDERED, ADJUDGED, and DECREED** that the Receiver's fees and expenses are hereby **APPROVED** in the amount of \$6156.65.

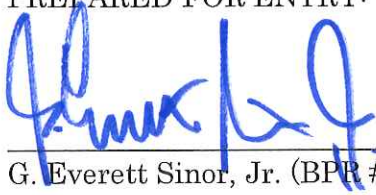
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$3942.65 from the assets of the
Laurel Hills Water System in Receivership is hereby **AUTHORIZED**; and,
- (2) **COSTS ARE TAXED** on an interim basis to the Plaintiff, the Tennessee
Public Utility Commission, in the amount of \$2214.00.

ENTERED this ____ day of _____, 2019.

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



G. Everett Sinor, Jr. (BPR #017564)

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Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing order has been served upon the parties hereto and the other persons listed below, at:

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via the United States Mails, postage prepaid, this ____ day of _____, 2019.