

G. EVERETT SINOR, JR.
Attorney at Law

RECEIVED
12-13-17

December 12, 2017

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 STATES FIRST CLASS MAILS

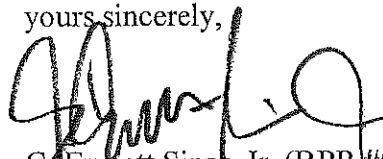
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Twenty-First 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. Thanking you for your consideration of this matter, I remain,

yours sincerely,



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

Enclosures

cc: Receivership Management, Inc.
Kelly Cashman-Grams, Esq.
Aaron Conklin, Esq.
James Gass, Esq.
Scott D. Hall, Esq.
Vance Broemel, Esq.
Roger 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,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

Date 12-13 FILED 2017 at 1:59
AM
PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY LS

RECEIVER'S TWENTY-FIRST 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 Chief Operations Officer 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 Twenty-First 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

2. The Receiver filed its first report with the Cumberland County Clerk and Master on December 12, 2015, in which it provided the Court with financial and operational information for the LHWS, summarized the Receiver's activities regarding the system, and detailed some of the legal issues involving control of the water system properties in question. The Receiver has filed subsequent reports with the Cumberland County Clerk and Master in which it has provided the Court with additional financial and operational information, summarized the Receiver's activities regarding the system, set forth its implementation of the Receivership Plan, and detailed some of the continuing legal issues involving control of the water system properties in question.²

Implementation & Modification of Receivership Plan

3. The Receiver filed its Receivership Plan Implementation Progress Report with this Honorable Court on August 16, 2016, and reference is made to that progress report, as well as the Receiver's Eighth and subsequent Reports, for the Receiver's activities relative to the original Receivership Plan.

4. Given numerous problems fulfilling the original Receivership Plan, the Receiver filed a motion for the Court to adopt its First Modified Receivership Plan with this Honorable Court on November 27, 2017. As yet, that motion has not been scheduled for hearing, but a date will be sought that is mutually agreeable to the parties and the Receiver.

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.

² See the Receiver's subsequent reports, filed with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016, June 27, 2016, August 4, 2016, August 26, 2016, October 3, 2016, November 10, 2016, December 5, 2016, January 13, 2017, February 3, 2017, February 28, 2017, April 18, 2017, May 22, 2017, July 5, 2017, August 7, 2017, September 1, 2017, October 10, 2017, and November 28, 2017, respectively.

5. With respect to ownership/titling issues of the LHWS, the Receiver has still not received a substantive response to Mr. Sinor's April 12, 2016 letter from Moy Toy, LLC which requested information concerning such issues.

6. Since the failed February 21, 2017 global mediation session concluded, the Receiver has pursued its condemnation action in Cumberland County Circuit Court. Defendants in that condemnation action have filed a Motion to Dismiss, and that motion has not yet been heard. The Receiver intends to continue to pursue this action, consistent with both the Receiver's original Receivership Plan as well as the Receiver's First Modified Receivership Plan.

Operations and Other Activities of the Receiver

7. In October of 2017, 94 of the 123³ customers of the LHWS timely paid their water bill. Of the 29 non-paying customers, 19 are in the Cumberland Pointe condominium units, and 10 are located elsewhere on Renegade Mountain. Delinquency notices will be sent to customers if they fail to pay their bill for two (2) or more months, with cut-offs to follow for chronic non-payment, consistent with the Receiver's previous practice.

8. As previously reported, Mr. Williams repaired a significant leak in one of the main service lines. After repairing this leak, Mr. Williams estimated that the repair of that leak would cut the water use of the LHWS down by approximately 2/3, so that daily use has been reduced from approximately 27,000 gallons down to approximately 10,000 gallons. Both the October and November 2017 wholesale water bills were significantly lower, with a bill just slightly over \$1000.00. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

³ As previously reported, one (1) of the Cumberland Pointe buildings burnt to the ground on the evening/early morning of September 3-4, 2017. See the Receiver's Nineteenth Report, ¶ 9, p. 4, filed in the instant matter on October 10, 2017. That building had eight (8) units and had been counted as eight (8) separate LHWS customers. Thus, the new total LHWS customer base has been adjusted downward from 131 to 123.

9. As previously reported, the Receiver, solely in its capacity as the Receiver of the LHWS, filed a petition with the Commission for a Provisional Certificate of Public Convenience and Necessity to operate a water distribution system on Renegade Mountain.⁴ Both Renegade Mountain Community Club and the Consumer Advocate and Protection division of the Tennessee Attorney General and Reporter's office have filed petitions to intervene in that matter.⁵ The matter has been scheduled for hearing by the Commission on January 16, 2018.

10. As previously reported, at its docket call on August 16, 2017, this Honorable Court ordered the parties to appear at a status conference respecting the Commission's Motion for an Order to Show Cause and the Laurel Hills Condominiums POA's Motion to Enforce the Settlement Agreement for hearing. The status conference was continued by the Court with the agreement of the parties until December 20, 2017, with the conference to take place in Crossville.

Current Financial Information

11. As of October 31, 2017, there was an accounts receivable past due balance of \$45,704.26.⁶ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

12. As of October 31, 2017, the LHWS had a cash balance of \$23,757.23 in its main operating account; see Collective Exhibit B, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in October of 2017.⁷

⁴ *Petition for Grant of Provisional Certificate of Public Necessity and Convenience*, Docket No. 17-00098, filed with the Tennessee Public Utility Commission on September 12, 2017.

⁵ Pertinent documents relative to this matter may be found at the following website: <http://share.tn.gov/tra/dockets/1700098.htm>.

⁶ Of this amount, \$3388.60 is less than a month past due, and \$42,315.66 is more than a month past due. This past due amount excludes balances owed prior to the institution of the new monthly rate of \$114.24. See Exhibit A.

Current Modified Accrual Basis Financial Documents & Current Estimated Surplus

13. As previously reported, even laying aside Mr. Matherne's current and projected fees and expenses, the LHWS still faces potential financial deficits. In its projection, the Receiver attributes the problem to the fact that less customers are paying their bill than was initially projected when the current rate was proposed.

14. The Receiver has generated a number of internal, unaudited financial documents prepared on a modified accrual basis, which are attached hereto as Collective Exhibit C and which are incorporated herein by reference. Those documents are (1) an estimated monthly budget or monthly income statement; (2) a balance sheet as of October 31, 2017; and (3) a cash flow statement showing projected cash flows for the month of November, 2017. Actual cash receipts and disbursements for October of 2017 for the LIWS are contained in a spreadsheet that is attached hereto as Exhibit D and is incorporated herein by reference.

15. The Receiver now estimates that the LHWS will, on average, break even each month.⁸ For purposes of generating a balance sheet, only current assets, prepaid expenses and known current receivables were used towards determining the assets of the estate, with all known fees and expenses generated prior to the balance sheet date used towards determining liabilities. This document, calculated on a modified accrual basis, shows the

⁷ 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.

⁸ This estimate includes the Receiver's fees as well as Mr. Sinor's fees, but excludes Mr. Matherne's fees, which have always been taxed on an interim basis to the Commission by this Honorable Court, and which the Receiver presumes will continue to be so taxed for the distant future. For purposes of generating this estimated monthly income statement, the Receiver's and Mr. Sinor's fees and expenses are estimated to total approximately Six Thousand Dollars (\$6000.00) per month. See Collective Exhibit C.

LHWS with a \$13,142.67 surplus as of October 31, 2017. The projected cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of November, 2017.

Fees and Expenses of Receiver

16. 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.⁹

17. As shown in Collective Exhibit E, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, Chief Operations Officer of the Receiver, and other persons at the Receiver's office, including Mr. Cody Smith, Ms. Lauren Garcia, Ms. Jeanne Bryant, and Ms. Jere Cowan, performed work for this Receivership estate for the period of October 1, 2017 through October 31, 2017 in the amount of \$1672.88¹⁰ 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 E for the period October 1, 2017 through October 31, 2017 in the amount of \$3601.31. 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 E for the period October 1, 2017 through October 31, 2017 in the amount of \$5346.00.

⁹ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

¹⁰ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of October 1, 2017 through October 31, 2017, which total \$252.08.

18. 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 F and incorporated herein by reference; *see also* Affidavit of Robert E. Moore, Jr., attached hereto as Exhibit G and incorporated herein by reference.

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

- a. for Mr. Moore & others at the Receiver for October of 2017: \$1672.88;
- b. for Mr. Sinor working under Mr. Moore for October of 2017: \$3601.31; and,
- c. for Mr. Matherne working under Mr. Moore for October of 2017: \$5346.00.

20. 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.

[intentionally blank]

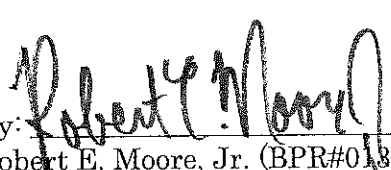
Motion for Approval of Fees and Expenses and Authorization for Payment

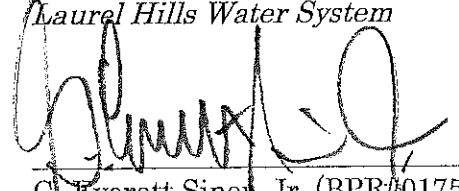
Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the fees and expenses as set forth herein in the aggregate amount of \$10,620.19, and further **MOVES** this Court to (a) authorize payment of fees and expenses out of Laurel Hills Water System in Receivership estate's funds in the amount of \$5274.19 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Commission on an interim basis in the amount of \$5346.00 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: December 12, 2017.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: 
Robert E. Moore, Jr. (BPR#013600)
Chief Operations Officer
Receivership Management Inc.
1101 Kermit Drive, Suite 735
Nashville, Tennessee 37217
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.
3504 Robin Road
Nashville, Tennessee 37204
615-969-9027 (Phone)
Everett.Sinor@gmail.com (Email)

*granted by commission
11/27/2017*

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

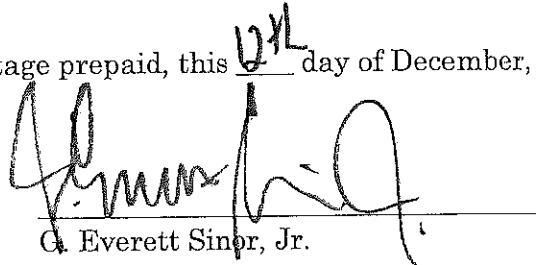
James L. Gass, Esq.
Ogle, Gass & Richardson
Counsel for Laurel Hills Condominiums
Property Owners Association
103 Bruce Street
Sevierville, Tennessee 37862

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

Vance Broemel, 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

via the United States Mails, postage prepaid, this 24th day of December, 2017.


G. Everett Siner, Jr.

4:25 PM

11/21/17

Laurel Hills Water System In Receivership
A/R Aging Summary
As of October 31, 2017

	<u>Current</u>	<u>1 - 30</u>	<u>31 - 60</u>	<u>61 - 90</u>	<u>> 90</u>	<u>TOTAL</u>
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	1,410.12	1,752.84
CHAMBERS, BARRY	0.00	114.24	0.00	0.00	0.00	114.24
CPCA (76)	0.00	2,170.56	1,949.70	2,741.76	32,215.68	39,077.70
HARDEMAN, GRETCHEN	0.00	114.24	0.00	0.00	0.00	114.24
JUDD, JONATHAN	0.00	114.24	0.00	0.00	0.00	114.24
KREIS, RICHARD	0.00	76.40	0.00	0.00	0.00	76.40
LATHAM, KENT	0.00	114.24	114.24	114.24	913.92	1,256.64
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	1,028.16	1,370.88
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	1,028.16	1,370.88
MATERDOMINI, DINA	0.00	114.24	114.24	0.00	0.00	228.48
MCQUEEN, DARRELL E	0.00	114.24	0.00	0.00	0.00	114.24
MILLER, DAVID	0.00	113.48	0.00	0.00	0.00	113.48
TOTAL	0.00	3,388.60	2,520.90	3,198.72	35,596.04	45,704.26

EXHIBIT
A

LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

10/31/2017

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	24,019.19	23,757.23
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(249.96)	
	<u>23,757.23</u>	<u>23,757.23</u>

17-Nov-17
10:42 AM

OUTSTANDING CHECKS

1147	249.96	
		<u>249.96</u>

EXHIBIT
B

REGIONS

Regions Bank
Brentwood
329 Franklin RD
Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
783 OLD HICKORY BLVD STE 255
BRENTWOOD TN 37027-4508

1

ACCOUNT # 0232618611

Cycle 053
Enclosures 26
Page 0
1 of 2

LIFEGREEN BUSINESS CHECKING
September 30, 2017 through October 31, 2017

SUMMARY

Beginning Balance	\$25,614.05		Minimum Balance	\$23,659
Deposits & Credits	\$13,141.33	+	Average Balance	\$29,265
Withdrawals	\$0.00	-		
Fees	\$0.00	-		
Automatic Transfers	\$0.00	+		
Checks	\$14,736.19	-		
Ending Balance	\$24,019.19			

DEPOSITS & CREDITS

10/02	Deposit - Thank You	571.20
10/12	Deposit - Thank You	1,370.88
10/12	Deposit - Thank You	9,599.38
10/19	Deposit - Thank You	800.19
10/26	Deposit - Thank You	799.68
Total Deposits & Credits		\$13,141.33

CHECKS

Date	Check No.	Amount	Date	Check No.	Amount
10/02	1137	1,148.00	10/20	1144	750.00
10/04	1141 *	300.00	10/25	1145	7,260.41
10/11	1142	1,077.78	10/31	1146	3,900.00
10/13	1143	300.00			
Total Checks					\$14,736.19

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance	Date	Balance
10/02	25,037.25	10/13	34,329.73	10/26	27,919.19
10/04	24,737.25	10/19	35,129.92	10/31	24,019.19
10/11	23,659.47	10/20	34,379.92		
10/12	34,629.73	10/25	27,119.51		

Easy Steps to Balance Your Account

		Checking Account
1.	Write here the amount shown on statement for ENDING BALANCE	\$
2.	Enter any deposits which have not been credited on this statement.	\$ +
3.	Total lines 1 & 2	\$ =
4.	Enter total from 4a (column on right side of page)	\$ -
5.	Subtract line 4 from line 3. This should be your checkbook balance.	\$ =

4a List any checks, payments, transfers or other withdrawals from your account that are not on this statement.

Check No.	Amount	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
	\$	
Total Enter in Line 4 at Left	\$	

The law requires you to use "reasonable care and promptness" in examining your bank statement and any checks sent with it and to report to the Bank an unauthorized signature (i.e., a forgery), any alteration of a check, or any unauthorized endorsement. You must report any forged signatures, alterations or forged endorsements to the Bank within the time periods specified under the Deposit Agreement. If you do not do this, the Bank will not be liable to you for the losses or claims arising from the forged signatures, forged endorsements or alterations. Please see the Deposit Agreement for further explanation of your responsibilities with regard to your statement and checks. A copy of our current Deposit Agreement may be requested at any of our branch locations.

**Summary of Our Error Resolution Procedures
In Case of Errors or Questions About Your Electronic Transfers**
Telephone us toll-free at 1-800-734-4667
or write us at
Regions Electronic Funds Transfer Services
Post Office Box 413
Birmingham, Alabama 35201

Please contact Regions as soon as you can, if you think your statement is wrong or if you need more information about a transfer listed on your statement. We must hear from you no later than sixty (60) days after we sent the FIRST statement on which the problem or error appeared.

- (1) Tell us your name and account number.
- (2) Describe the error or the transfer you are unsure about and explain as clearly as you can why you believe it is an error or why you need more information.
- (3) Tell us the dollar amount of the suspected error.

If you tell us verbally, we may require that you send us your complaint or question in writing within ten (10) business days.

We will determine whether an error occurred within ten (10) business days after we hear from you and will correct any error promptly. If we need more time, however, we may take up to forty-five (45) days to investigate your complaint or question (ninety (90) days for POS transactions or for transfers initiated outside of the United States). If we decide to do this, we will credit your account within ten (10) business days for the amount you think is in error. If, after the investigation, we determine that no bank error occurred, we will debit your account to the extent previously credited. If we ask you to put your complaint in writing and we do not receive it within ten (10) business days, we may not credit your account.

New Accounts- If an alleged error occurred within thirty (30) days after your first deposit to your account was made, we may have up to ninety (90) days to investigate your complaint, provided we credit your account within twenty (20) business days for the amount you think is in error. If we decide there was no error, we will send you a written explanation within three (3) business days after we finish our investigation. You may ask for copies of the documents that we used in our investigation.

FOR QUESTIONS CONCERNING THIS STATEMENT OR FOR VERIFICATION OF A PREAUTHORIZED DEPOSIT, PLEASE CALL THE PHONE NUMBER ON THE REVERSE SIDE OF THIS STATEMENT OR VISIT YOUR NEAREST REGIONS LOCATION.

ADJ - Adjustment	RI - Return Item	CR - Credit	SC - Service Charge	OD - Overdrawn
EB - Electronic Banking	NSF - Nonsufficient Funds	APY - Annual Percentage Yield	FWT - Federal Withholding Tax	*Break in Number Sequence

LHWS Balance Sheet (as of 10/31/2017) - Modified Accrual Basis*

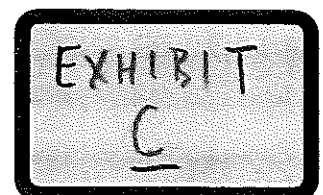
Current Assets

Cash	\$23,757.23	
Receivable - TPUC/RMI/Laurel Hills - RMI/Sinor F&E	\$0.00	
Prepaid Expense - CNA Insurance (2017-18 PY)	<u>\$6,889.14</u>	
Total Current Assets		\$30,646.37

Liabilities

Payable - Lansford & Stephens (October Billing)	\$300.00	
Payable - Gerald Williams (October Billing)	\$750.00	
Payable - Volunteer Electric Service	\$600.00	
Payable - September 2017 F&E RMI & Sinor	\$6,907.51	
Payable - October 2017 F&E RMI & Sinor	\$5,279.19	
Reserve (Survey work on Renegade Mountain--last 1/2 of p'mnt)	\$2,500.00	
Reserve (Lansford & Stephens - 2017 Tax Form Prep.)	\$200.00	
Reserve (TDEC Fees)	\$400.00	
Reserve (MicroBac)	\$67.00	
Reserve (Repair)	<u>\$500.00</u>	
Total Liabilities		<u>\$17,503.70</u>
Surplus (Deficit)		\$13,142.67

* 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 Projected for November 2017

Starting Balance (10/31/2017)		\$23,757.23
Projected Deposits in November 2017	\$11,050.00	
Projected Cash Inflows		<u>\$11,050.00</u>
Current Assets PLUS Projected Cash Inflows		\$34,807.23
Crab Orchard Utility District	\$1,046.28	
Volunteer Electric Cooperative	\$249.96	
Gerald Williams	\$750.00	
Lansford & Stephens	\$300.00	
Survey Work Balance	\$2,500.00	
September 2017 RMI & Sinor Fees & Expenses	<u>\$6,907.51</u>	
Projected Cash Outflows		<u>\$11,753.75</u>
Projected Ending Balance (11/30/2017)		\$23,053.48

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

Estimated Monthly Income Statement - LHWS*

Income

Average Deposits	<u>\$11,050.00</u>	
Average Income		\$11,050.00

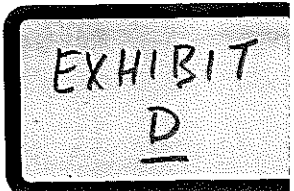
Expenses

CNA Insurance	\$1,148.00	
Crab Orchard Utility District (Wholesale Water)	\$1,500.00	
Volunteer Electric Company (Electric)	\$600.00	
TDEC	\$25.00	
Gerald Williams (Contract Operator)	\$750.00	
Lansford & Stephens (Accountants)	\$333.00	
MicroBac	\$67.00	
Repair Reserve	\$500.00	
RMI & Sinor fees and expenses	<u>\$6,000.00</u>	
Average Expenses		\$10,923.00
Projected Monthly Income (Deficit)		\$127.00

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

LHWD CASH RECEIPTS (DISBURSEMENTS)
10/1/17 Through 10/31/17

Date	Account	Num	Description	Memo	Amount
11/17/17			EXPENSES		
			1935		
			201707		
10/25/17	REGIONS LHWD 02326186...	1145	S RECEIVERSHIP MANAGEMENT INC		-2,970.50
			TOTAL 201707		-2,970.50
			201708		
10/25/17	REGIONS LHWD 02326186...	1145	S RECEIVERSHIP MANAGEMENT INC		-4,289.91
			TOTAL 201708		-4,289.91
			TOTAL 1935		-7,260.41
			4010-WATER BILL RECEIPTS		
10/2/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		571.20
10/12/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		1,370.88
10/12/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		9,599.38
10/19/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		800.19
10/26/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		799.68
			TOTAL 4010-WATER BILL RECEIPTS		13,141.33
			5695-FEES ACCOUNTING		
10/4/17	REGIONS LHWD 02326186...	1143	S LANSFORD & STEPHENS	SEPT 2017 FEES	-300.00
			TOTAL 5695-FEES ACCOUNTING		-300.00
			5697-OTHER CONTRACT LABOR		
10/12/17	REGIONS LHWD 02326186...	1144	GERALD WILLIAMS		-750.00
			TOTAL 5697-OTHER CONTRACT LABOR		-750.00
			6290-UTILITIES		
10/4/17	REGIONS LHWD 02326186...	1142	CRAB ORCHARD UTILITY DISTRICT		-1,077.78
10/25/17	REGIONS LHWD 02326186...	1146	WILSON PAVING		-3,900.00
10/30/17	REGIONS LHWD 02326186...	1147	VOLUNTEER ENERGY COOPERATIVE		-249.96
			TOTAL 6290-UTILITIES		-5,227.74
			TOTAL EXPENSES		-396.82
			OVERALL TOTAL		-396.82



**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES - OCTOBER 2017**

<u>Jeanne Barnes Bryant</u>	
October 2017 Fees	\$283.10
October 2017 Overhead Expense	\$26.60
<u>Receivership Management, Inc.</u>	
October 2017 Fees	\$1,137.70
October 2017 Overhead Expense	\$175.00
October 2017 Expenses	\$50.48
<u>Everett Sinor</u>	
October 2017 Fees & Expenses	<u>\$3,601.31</u>
Proposed Payment out of Receivership Estate	\$5,274.19
<u>Graham Matherne</u>	
October 2017 Fees & Expenses	<u>\$5,346.00</u>
Proposed Interim Taxation of Costs	\$5,346.00

EXHIBIT
E

Receivership Management, Inc.
P. O. Box 2307
Brentwood, TN 37024

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		October 2017
10/4/2017	Jeanne Barnes Bryant	EMAIL RE REPORT 0.1 \$163.00 \$16.30
10/9/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT, EMAIL RE PETITION ON CCN FILING 0.3 \$163.00 \$48.90
10/10/2017	Jeanne Barnes Bryant	QUESTION TO ROB MOORE RE INTERVENTION PETITION AND HEARING 0.1 \$163.00 \$16.30
10/17/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL, REVIEW REPORT 0.2 \$163.00 \$32.60
10/18/2017	Jeanne Barnes Bryant	EMAIL TO COUNSEL RE REPORT, QUESTION RE AFFIDAVIT 0.1 \$163.00 \$16.30
10/20/2017	Jeanne Barnes Bryant	CALL WITH ROB MOORE RE CHANGE OF DIRECTION ON ACTIONS, QUESTIONS RE SAME 0.5 \$163.00 \$81.50
10/24/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT, DISCUSSION WITH ROB MOORE RE CHANGES IN PROCESS 0.2 \$163.00 \$32.60
10/25/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS 0.1 \$163.00 \$16.30
10/27/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS, UPDATE FROM ROB MOORE 0.2 \$163.00 \$32.60
10/31/2017	Jeanne Barnes Bryant	UPDATE RE DRAFTS FOR FILING 0.1 \$163.00 \$16.30
Total		\$309.70

Receivership Management, Inc.
P. O. Box 2307
Brentwood, TN 37024

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **October 2017**

Date	Client	Description	Hours	Rate	Amount
10/2/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 09-30-17. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION.	0.5	\$123.00	\$61.50
10/3/2017	Cody Smith	EMAILS WITH E.SINOR RE C.N.A AUDIT REDUCTION. DISCUSS CURRENT PYMT SCHEDULE CHANGE.	0.3	\$123.00	\$36.90
10/3/2017	Jere P. Cowan	RECEIPT FUNDS; EMAIL R. MOORE RE: SAME	0.1	\$50.00	\$5.00
10/4/2017	Cody Smith	CONFERENCE CALL WITH R.MOORE ABD E.SINOR RE C.N.A INSURANCE AUDIT AND 9/30/17 LHWD FINANCIALS.	1.2	\$123.00	\$147.60
10/4/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD PAYMENTS OF SAME	0.6	\$50.00	\$30.00
10/4/2017	Lauren B. Garcia	PRINT SEPTEMBER BANK STATEMENT	0.1	\$50.00	\$5.00
10/5/2017	Jere P. Cowan	TELEPHONE CONVERSATION WITH TRUSTEE OFFICE RE: TAX; EMAIL R. MOORE RE: SAME	0.1	\$50.00	\$5.00
10/5/2017	Robert E. Moore, Jr.	CONFERENCE CALL WITH C.SMITH AND E.SINOR RE: CONCERNS FROM C.N.A. INSURANCE; DIRECT E.SINOR TO ARRANGE MEETING WITH REPRESENTATIVES OF ARTHUR J.GALLAGHER RE: SAME. .75	0.75	\$153.00	\$114.75
10/6/2017	Cody Smith	EMAILS WITH E.SINOR RE FINANCIALS & C.N.A PREMIUM ISSUE.	0.2	\$123.00	\$24.60
10/6/2017	Jere P. Cowan	EMAIL FROM E. SINOR SENDING FILED REPORT	0.1	\$50.00	\$5.00
10/6/2017	Robert E. Moore, Jr.	CALL WITH J.NUNNALLY RE: INSURANCE AUDIT AND ISSUES SURROUNDING INSURANCE POLICY .4; CALL WITH E.SINOR RE: SAME. .2	0.6	\$153.00	\$91.80
10/9/2017	Lauren B. Garcia	PROCESS THREE INVOICES	0.3	\$50.00	\$15.00

Monday, November 27, 2017

LAUREL HILLS WATER DISTRICT

October 2017

Date	Attorney	Description	Hours	Rate	Total
10/9/2017	Robert E. Moore, Jr.	CALL FROM E.SINOR RE: PAVING WORK, EMAILS TO AND FROM G.MATHERNE RE: MAPS, C N A INSURANCE ISSUES, REVIEW MOTION TO INTERVENE AND DISCUSSION WITH E.SINOR, CCN ISSUES .5	0.5	\$153.00	\$76.50
10/10/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.5	\$123.00	\$61.50
10/11/2017	Cody Smith	RECONCILE BANK ACCOUNT AND UPDATE TB THRU 9/30/17. REQUEST UPDATE ON C.N.A PYMT SCHEDULE.	0.5	\$123.00	\$61.50
10/11/2017	Robert E. Moore, Jr.	CALL TO E.SINOR RE:EMAILS CONCERNING LAUREL HILLS TIMESHARES, PAVING REPAIRS, ONGOING INSURANCE ISSUES, LFT MSG .10; EMAIL TO J.STATON RE: SURVEY STATUS .10	0.2	\$153.00	\$30.60
10/12/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 09-30-17. PREPARING EXHIBITS FOR COURT REPORTS. PREPARE NECESSARY BACKUP DOCUMENTATION.	0.5	\$123.00	\$61.50
10/12/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.2	\$50.00	\$10.00
10/13/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.3	\$50.00	\$15.00
10/16/2017	Lauren B. Garcia	POST TWO DEPOSITS, RECONCILE SEPTEMBER BANK STATEMENT	0.4	\$50.00	\$20.00
10/23/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. APPROVE AND PAY O/S LIABILITIES.	0.3	\$123.00	\$36.90
10/23/2017	Robert E. Moore, Jr.	REVIEW AND APPROVE REPORT .10	0.1	\$153.00	\$15.30
10/24/2017	Jere P. Cowan	FINALIZE R. MOORE AFFIDAVIT; EMAIL WITH E. SINOR RE: MOTION AND AFFIDAVIT; FORWARD SAME	0.4	\$50.00	\$20.00
10/24/2017	Robert E. Moore, Jr.	CALL WITH K.GRAMS RE: STATUS OF CONDEMNATION, EMAIL TO G.MATHERNE AND E.SINOR FOR PHONE CONFERENCE .6	0.6	\$153.00	\$91.80
10/25/2017	Jere P. Cowan	RECEIPT AND REVIEW ORDER FROM COURT APPROVING MOTION; CONFERENCE WITH C SMITH RE: EXPENSE PROCESSING; PREPARE SAME UPDATING FINANCIALS; FORWARD SAME	0.6	\$50.00	\$30.00
10/25/2017	Lauren B. Garcia	RUN MONTH ASSET CHANGE REPORT FOR AUGUST THRU SEPTEMBER	0.2	\$50.00	\$10.00
10/25/2017	Robert E. Moore, Jr.	CALL WITH G.MATHERNE AND E.SINOR RE: PROCEEDINGS AND RECEIVERSHIP PLAN .75	0.75	\$153.00	\$114.75

Monday, November 27, 2017

LAUREL HILLS WATER DISTRICT		October 2017	
10/26/2017	Robert E. Moore, Jr.	EMAIL TO E.SINOR AND G.MATHERNE RE: CONDEMNATION ACTION .10	0.1 \$153.00 \$15.30
10/27/2017	Cody Smith	REVIEW COURT APPROVALS THEN PAY O/S CONTRACT LABOR ALONG WITH FEE & EXP ACCRUALS	0.2 \$123.00 \$24.60
10/27/2017	Jere P. Cowan	EXPENSE PAYMENT AND PROCESSING; FORWARD SAME	0.4 \$50.00 \$20.00
10/29/2017	Robert E. Moore, Jr.	EMAIL TO G.MATHERNE RE: A SETTLEMENT PROPOSAL FROM TPUC .10	0.1 \$153.00 \$15.30
10/30/2017	Jere P. Cowan	PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.4 \$50.00 \$20.00
10/30/2017	Lauren B. Garcia	POST MONTH ASSET CHANGE FOR AUGUST AND SEPTEMBER	0.4 \$50.00 \$20.00
Total			\$1,312.70

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

NOVEMBER 8, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1045981

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH OCTOBER 31, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$5,346.00
TOTAL THIS INVOICE	\$5,346.00
PREVIOUSLY BILLED AND OUTSTANDING	\$15,390.00
TOTAL AMOUNT DUE	\$20,736.00

=====

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

NOVEMBER 8, 2017
008264.000036
J. GRAHAM MATHERNE
INVOICE # 1045981

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH OCTOBER 31, 2017

10/03/17	FURTHER WORK ON TERRA MOUNTAIN MOTION TO DISMISS RESPONSE. J. GRAHAM MATHERNE 1.20 hours at 270.00 per hour.	324.00
10/05/17	TELEPHONE CONFERENCE WITH E. SINOR REGARDING CORRESPONDENCE FROM SCHWERER REGARDING LAUREL HILL. J. GRAHAM MATHERNE .20 hours at 270.00 per hour.	54.00
10/10/17	REVIEW SERVICE AREA/TERRITORY MAP (.20); CONTINUED WORK ON RESPONSE TO TERRA MOUNTAIN MOTION (.90). J. GRAHAM MATHERNE 1.10 hours at 270.00 per hour.	297.00
10/12/17	E-MAILS FROM SINOR REGARDING REPORT AS TO TPUC ISSUES, COUD ISSUES AND NUMEROUS RELATED MATTERS (.80); REVIEW TMCC MOTION TO INTERVENE (.30); REVIEW EMAILS BETWEEN HALL AND CONKLIN REGARDING HEARING AND RELATED MATTERS (.10); FURTHER LEGAL RESEARCH (.60). J. GRAHAM MATHERNE 1.80 hours at 270.00 per hour.	486.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1045981

Nov 8, 2017
PAGE 3

10/13/17	WORK ON SERVICE AREA MAP AND CROSS-CHEEK OWNERSHIP OF NON-PLATTED AREAS (1.60); OUTLINE MATTERS TO RAISE WITH SINOR AND MOORE (.60); EMAILS WITH SINOR AND MOORE REGARDING SAME (.80).	J. GRAHAM MATHERNE	3.00 hours at 270.00 per hour.	810.00
10/14/17	REVIEW MATERIAL REGARDING SERVICE AREA MAPS (.40); TELEPHONE CONFERENCE AND SHORT MEETING WITH SINOR REGARDING SAME (.20).	J. GRAHAM MATHERNE	.60 hours at 270.00 per hour.	162.00
10/17/17	E-MAILS WITH E. SINOR REGARDING TPUC/MOY TOY DEVELOPMENT (.20); FURTHER WORK ON SERVICE AREA MAP AND CCN ISSUES (.70); LEGAL RESEARCH REGARDING SAME (.90).	J. GRAHAM MATHERNE	1.80 hours at 270.00 per hour.	486.00
10/18/17	E-MAILS WITH SINOR REGARDING REPORT TO COURT AND REGARDING FILING IN TPUC CONTEMPT ACTION.	J. GRAHAM MATHERNE	.10 hours at 270.00 per hour.	27.00
10/19/17	E-MAIL WITH E. SINOR REGARDING UPDATE ON ISSUES (.10); TELEPHONE CONFERENCE WITH R. MOORE AND E. SINOR REGARDING SAME (.50); LEGAL RESEARCH REGARDING PROCEDURAL ISSUES (1.20).	J. GRAHAM MATHERNE	1.80 hours at 270.00 per hour.	486.00
10/21/17	FURTHER LEGAL RESEARCH REGARDING PROCEDURAL ISSUES AND CROSS REFERENCE STATUTES AND RULES AND CASELAW.	J. GRAHAM MATHERNE	.70 hours at 270.00 per hour.	189.00
10/22/17	REPORT E-MAIL TO R. MOORE AND E. SINOR REGARDING PROCEDURAL ISSUES.	J. GRAHAM MATHERNE	.60 hours at 270.00 per hour.	162.00
10/23/17	E-MAILS WITH E. SINOR REGARDING RESETTING OF CONTEMPT; ORDERS APPROVING RECEIVER REPORT AND TPUC CCN SCHEDULING ORDER.	J. GRAHAM MATHERNE	.40 hours at 270.00 per hour.	108.00
10/24/17	E-MAILS WITH R. MOORE / SINOR REGARDING NEEDED CONFERENCE CALL AS TO STATUS (.10); FURTHER EDITS TO RESPONSE TO TERRA MOUNTAIN'S MOTION TO DISMISS (.50).	J. GRAHAM MATHERNE	.60 hours at 270.00 per hour.	162.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1045981

Nov 8, 2017
PAGE 4

10/25/17 PREPARATION FOR AND TELEPHONE CONFERENCE WITH R. MOORE AND E. SINOR REGARDING STATUS ISSUES AND MOVING FORWARD REGARDING CONDEMNATION ACTION, CCN FILING AND RELATED MATTERS (.90); E-MAILS WITH R. MOORE AND E. SINOR REGARDING RESPONSE TO TERRA MOUNTAIN'S MOTION TO DISMISS (.10).
J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour. 270.00

10/27/17 TELEPHONE CONFERENCE WITH E. SINOR REGARDING ISSUES RELATING TO PROVISIONAL CCN AND CONDEMNATION ACTION (.30); REVIEW E-MAILS FROM SINOR REGARDING SAME (.20); TELEPHONE CONFERENCE WITH R. MOORE REGARDING SAME (.20); E-MAIL FROM COUNSEL REGARDING ISSUES RELATING TO GLOBAL STATUS (.20); REVIEW ATTACHMENTS TO SAME (.50).
J. GRAHAM MATHERNE 1.30 hours at 270.00 per hour. 351.00

10/29/17 FURTHER REVIEW OF COUNSEL CORRESPONDENCE RELATING TO GLOBAL STATUS AND ISSUES (.30); CROSS-CHECK MAPS OF SERVICE AREAS / PIPES / CONVERSATION AREAS REGARDING SAME (.30); E-MAIL TO MOORE AND SINOR REGARDING SAME (.10).
J. GRAHAM MATHERNE .70 hours at 270.00 per hour. 189.00

10/30/17 TELEPHONE CONFERENCE WITH E. SINOR REGARDING TPUC AND RECEIVERSHIP COURT FILINGS AND ISSUES RELATED TO SERVICE MAP AND OTHER MATTERS (.40); TELEPHONE CONFERENCE WITH COUNSEL REGARDING CASE ISSUES (.50); REVIEW MATERIALS REGARDING SERVICE MAP ISSUES (.50).
J. GRAHAM MATHERNE 1.40 hours at 270.00 per hour. 378.00

10/31/17 FURTHER REVIEW OF MODIFICATION TO RECEIVER PLAN (.30); TELEPHONE CONFERENCE WITH E. SINOR AND R. MOORE REGARDING SAME AND REGARDING ISSUES OF SERVICE MAP IN CCN AND RELATED MATTERS (.60); E-MAIL TO COUNSEL REGARDING SAME (.60).
J. GRAHAM MATHERNE 1.50 hours at 270.00 per hour. 405.00

TOTAL SERVICES 19.80 \$5,346.00

TOTAL THIS INVOICE \$5,346.00

PREVIOUSLY BILLED AND OUTSTANDING \$15,390.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1045981

Nov 8, 2017
PAGE 5

TOTAL AMOUNT DUE

\$20,736.00

=====

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEE
J MATHERNE PARTNER	270.00	19.80	5346.00

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

November 2, 2017

Receivership Management, Inc.
Attn: Mr. Robert E. Moore, Jr.
1101 Kermit Drive, Suite 735
Nashville, Tennessee 37217

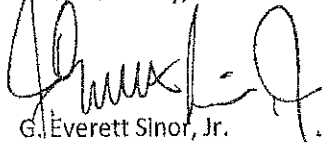
RE: *October 2017 Billings – RMI/Laurel Hills Water System in Receivership*

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>
10/4/2017	T.C. w R Schwerer re 1 LHWS unit and the receivable due; email to R Schwerer with order approving rate	0.5		
10/5/2017	T.C. w G Williams re cutoff @ LHWS; maps; and pavers; T.C. w G Matherne re LHWS matters; review of CNA/AJG emails re insurance; T.C. w D Foster re LHWS; email from D Foster; review of documents; email to Heather w Lansford & Stephens re A/R report; T.C. w C Smith & R Moore re LHWS matters; T.C. w M Hargis w AJG re insurance	1.4		
10/6/2017	T.C. w M Hargis w AJG re insurance reconciliation for 2016-17 policy year; email to M Hargis re same; email from M Hargis re same	0.3		
10/9/2017	Review G. Williams email re paving contractors; review G Matherne billing; T.C. w Manual Wilson re paving; finish 19th report; review of Consumer Advocate's Petition to Intervene; review of 8-31-2017 financials; email to C Smith re 9-30-2017 financials; T.C. w G Williams re pavers and maps; email to G Matherne re same; Email to G Williams, R Moore & C Smith re pavers; T.C. w M Hargis re meeting & insurance calculation; T.C. w R Moore re same & other LHWS matters	2.0		
10/10/2017	T.C. w G Williams re maps for CCN petition; review of A/R report; email w G Williams re maps; email from M Hargis re GL insurance issues; v.m. from R Schwerer; T.C. w C Smith re insurance T.C. w R Schwerer & review of email; prep of Sept 2017 financials	1.0		
10/11/2017	V.M. for R Moore; review G. Williams email on maps; review R Moore email re same; email to Martha Bettis re address for payment	0.1		
10/12/2017	T.C. w A Conklin re LHWS matters; review S Hall &* A Conklin email re status conference; emails to R Moore & G Matherne re same; review intervention petition of Renegade Mountain CC; Email to R Schwere re paving work; T.C. to Heather w L&S re Martha Bettis; email to Martha Bettis w new billing information; email to G Williams re paving; email from A Conklin re status conference dates; G Williams email; T.C. w E Bolin re COUD meeting; T.C. to C Smith; email to G Matherne & R Moore re same; email from S Hall re motion; T.C. to C Smith re Sept financials; email to M hargis re conf call w GL underwriter; review M Hargis email re same; email to C Smith & R Moore re AJG email	1.8		

10/13/2017	Martha Bettis email on payments; email to G Williams re low water pressure reported in Woodbridge; email to Heather w L&S re request for automatic payments; review deposits from L&S; T.C. to G Williams & Heather; review of A Conklin proposed order re denial of motion to amend; T.C. w G Williams re paving, Ms. Bettis, COUD water usage and leak fix and estimated wholesale water usage and bill; review of A Conklin agreed order; email to A Conklin w dates for status conference; Manuel Wilson (paver) email w invoice; email to R Moore & C Smith w recommendation for payment; review M Hargis email; forward same to R Moore & C Smith; R Moore email on insurance & response; T.C. w G Williams; email to G Matherne & R Moore re sewer plant & maps; review M Hargis email on original application for insurance; forward same to R Moore; T.C. w G Matherne	1.4
10/16/2017	T.C. w A Conklin re scheduling order; email to R Moore & G Matherne re same; review of agreed order; work on 20th report; email from M Hargis re GL insurance and response; email to M Hargis re being fully paid up on 2017-18 premium; email to G Matherne re condemnation suit; T.C. w V Broemel re LHWS matters; email to R Moore & J Bryant w 20th report draft	2.0
10/18/2017	Email from M Hargis re confirmation of payments; forward same to R Moore & C Smith; exhibits compiled for 20th report; email from J Bryant re 20th report and response	0.5
10/19/2017	T.C. w A Conklin re LHWS matters; T.C. w G Matherne & R Moore re same; T.C. w A Conklin in follow up	0.9
10/20/2017	T.C. w K Cashman-Grams re meeting set up; email to G Matherne & R Moore re same & A Conklin conversation	0.2
10/23/2017	T.C. (2) w Karl Robinson re his bill; T.C. w Heather @ Lansford & Stephens re same; travel to and attendance at TPUC meeting; review of order re fees from Cumberland County C&M; forward same to C Eaton, R Moore & G Matherne; email from R Moore re insurance; email to M Hargis re same; email to Ms Bettis re her inquiry on water pressure at Woodbridge Condos; email to G Matherne & R Moore re TPUC meeting; review of order re continuance of status conference	2.1
10/24/2017	Email to K Cashman-Grams w 20th LHWS report & affidavit; T.C. w K Cashman-Grams & email from R Moore	0.3
10/25/2017	T.C. w G Matherne & R Moore re LHWS matters; review R Moore email re LHWS issues	0.8
10/26/2017	Review email from hearing officer & response to intervenors; email re scheduling order; emails re setting up conference call; conf call & modification of proposed schedule; review docs from civil action	1.7

10/27/2017	T.C. w G Matherne re receivership plan; T.C. w G Matherne re tracts of land on Renegade Mtn; email to R Moore re plan; T.C. w D Whitaker w TN Atty Genl Consumer Advocate re CCN action; Review D Whitaker email on scheduling order; email to R Moore on plan; T.C. w R Moore re LHWS matters	1.8		
10/29/2017	Review A Conklin email; email to G Matherne & R Moore re same	0.4		
10/30/2017	Prep of modified receivership plan; T.C. w Connie Turner w Cumberland Co C&M re dates of filings; T.C. w G Matherne re tracts of land and receivership plan; email draft of plan to R Moore & G Matherne	5.4		
10/31/2017	T.C. w G Matherne; V.M. for G Williams re sewer plant; email to G Matherne & R Moore re CCN petition; T.C. w G Matherne re LHWS matters	<u>0.3</u>		
	Hourly Billing Total	24.9	\$140.00	\$3,486.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	19th Report Postage	\$104.36		
	CCN Petition Postage	<u>\$10.95</u>		
	Other Expenses Reimburseable Total			<u>\$115.31</u>
	Balance Owed this month			\$3,601.31
	Previous Balance Owed		\$3,974.38	
	Total Amount Due and Payable			\$7,575.69

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

101 Creekside Crossing
Suite 1700
Brentwood, TN 37027
(615) 377-8100

10/09/17 05:14 PM

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



001	500563 (002)	T1 \$	3.49	
	19X14 Bub Mailer #7			
002	500418 (002)	T1 \$	18.13	
	12x15 Bub Mailer #4 QTY 7			
	Reg Unit Price \$	2.59		
003	001040 (001)	TO \$	9.28	
	Ground Commercial			
	Tracking# 1Z303Y3Y0307247699			
004	001040 (001)	TO \$	12.31	
	Ground Commercial			
	Tracking# 1Z303Y3Y0373914932			
005	001040 (001)	TO \$	12.31	
	Ground Commercial			
	Tracking# 1Z303Y3Y0307248858			
006	001040 (001)	TO \$	11.88	
	Ground Commercial			
	Tracking# 1Z303Y3Y0307249437			
007	000008 (022)	TO \$	12.98	
	Priority Mail			
	Tracking# 9405510200829538578944			
008	001045 (001)	TO \$	9.60	
	Ground Residential			
	Tracking# 1Z303Y3Y0307250596			
009	001040 (001)	TO \$	12.37	
	Ground Commercial			
	Tracking# 1Z303Y3Y0307251175			

SubTotal \$ 102.35
State and County Tax (T1) \$ 2.01
Total \$ 104.36

MASTERCARD \$ 104.36
ACCOUNT NUMBER * *****3631
Appr Code: 08340Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 00000800C
TSI: E800
AC: /007EFB8E091E43B
ARC: 00

IGN Receipt
UNUS

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

10/30/17 05:38 PM

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



001	008237 (022)	TO \$	3.03	
	First Class Package			
	Tracking# MMWJNUAPEHRV			
002	008237 (022)	TO \$	7.92	
	First Class Package			
	Tracking# MMWJNUURVMBBF			

SubTotal \$ 10.95
Total \$ 10.95

MASTERCARD \$ 10.95
ACCOUNT NUMBER * *****3631
Appr Code: 09543Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 00000800C
TSI: E800
AC: 3368D85D1618AFB7
ARC: 00

Receipt ID 83997749892670888333 002 Items
CSH: Diane Tran: 2854 Reg: 001

Thank you for your business!

Whatever your business and personal
needs, we are here to serve you.

US Postal Rates Are Subject to Surcharge

We're here to help.
Join our FREE email program to receive
great offers and resources.

www.theupsstore.com/signup

CCN Scheduling

RMI EXP RECOVERABLE LHWD
10/1/17 Through 10/31/17

Category Description	10/1/17- 10/31/17	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-283.10	-283.10
5610-CONTRACT LABOR RMI	-1,137.70	-1,137.70
5690-RMI OH EXPENSE	-201.60	-201.60
TOTAL 5100 FEES RMI	-1,622.40	-1,622.40
5150 FEES LEGAL		
5400-LEGAL FEES	-8,947.31	-8,947.31
TOTAL 5150 FEES LEGAL	-8,947.31	-8,947.31
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-8.20	-8.20
6210-POSTAGE	-4.62	-4.62
6222-TELEPHONE LONG DISTANCE	-2.20	-2.20
TOTAL 5300 EXPENSES	-50.48	-50.48
OVERALL TOTAL	-10,620.19	-10,620.19

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.

EXHIBIT
E

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 October 1, 2017 through October 31, 2017 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.

[intentionally blank]

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.

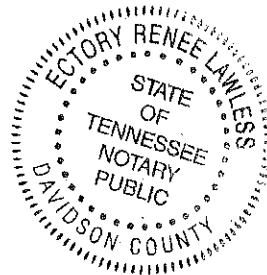
FURTHER THE AFFIANT SAITH NOT.

Kelly Cashman Grams
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this
5th day of December, 2017.

Rebecca R. Lauffess
NOTARY PUBLIC

My commission expires: 1/9/2018



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 Chief Operations Officer 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
G

expenses incurred for the period of time between October 1, 2017 and October 31, 2017 that are contained in the Receiver's motion.

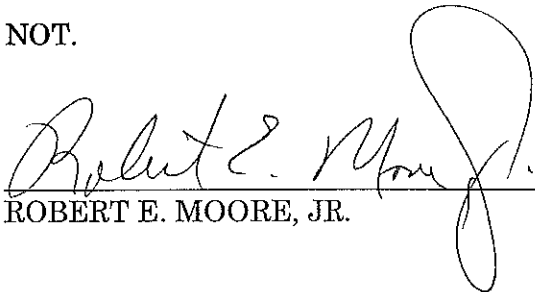
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership; as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide 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.

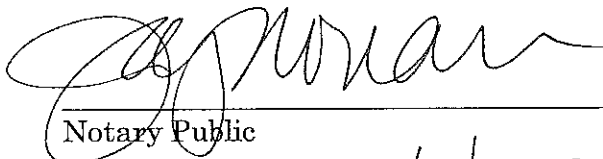
[intentionally blank]

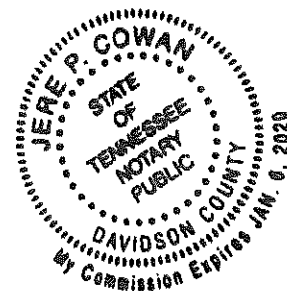
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the 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 \$5279.19 (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 \$5346.00 (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
27th day of November, 2017.


Notary Public
Commission Expires: 1/6/2020



RECEIVED
12-13-17

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

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 December, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for October of 2017, 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 \$10,620.19.

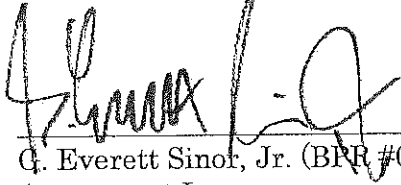
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$5274.19 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 \$5346.00.

ENTERED this ____ day of _____, 2017.

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



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

Attorney at Law

Counsel for Receivership Management, Inc.

3504 Robin Road

Nashville, Tennessee 37204

615.969.9027

Everett.Sinor@gmail.com

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:

Aaron Conklin, Esq.
Staff Attorney
Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

James L. Gass, Esq.
Ogle, Gass & Richardson
Counsel for Laurel Hills Condominiums
Property Owners Association
103 Bruce Street
Sevierville, Tennessee 37862

Vance Broemel, 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

G. Everett Sinor, Jr., Esq.
Attorney at Law
Counsel for Receivership Management, Inc.
3504 Robin Road
Nashville, Tennessee 37204

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

via the United States Mails, postage prepaid, this ____ day of _____, 2017.