

G. EVERETT SINOR, JR.

Attorney at Law

August 31, 2018

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

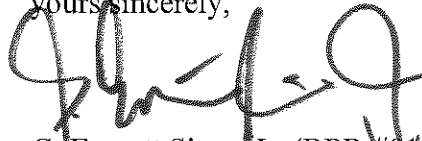
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Twenty-Seventh 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. (BPR #017564)

Attorney at Law

Enclosures

ec: Receivership Management, Inc.
Daniel Moore, 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, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

RECEIVER'S TWENTY-SEVENTH 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-Seventh 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 & Modification of Receivership Plan; Global Settlement Negotiations

2. 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.

3. As previously reported, the Receiver filed a motion on November 27, 2017 for the Court to adopt its First Modified Receivership Plan with this Honorable Court, a proposed order to adopt said First Modified Receivership Plan was also filed with the Court for its consideration. The Receiver's motion and other pending motions in this matter have been continued on numerous occasions. At its docket call in Crossville on August 16, 2018, the Court passed the instant matter without setting a future hearing or status conference date in order to give the parties and the Receiver some time to resolve their differences and develop a long-term solution. As has been previously reported, the Commission and the other parties to this matter have been negotiating a "global settlement" or "global agreement" to work out and finally resolve all issues that led to the need to create the instant receivership estate. The Receiver understands that those negotiations are progressing, and the Receiver will continue to update the Court on any progress (or lack thereof) on this front to the extent it is aware of such progress.

4. Currently, the Receiver's condemnation action in Cumberland County Circuit Court is on hold pending the results of the global settlement negotiations referenced above.

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.

Operations and Other Activities of the Receiver

5. In July of 2018, 89 of the 123 customers of the LHWS timely paid their water bill. Of the 34 non-paying customers, 22 are in the Cumberland Pointe condominium units, and 12 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.

6. As previously reported, there is an as-yet undiscovered leak somewhere in the Cumberland Pointe condominium complex. This undiscovered leak has now diminished to approximately two (2) gallons per minute; this equates to approximately Twenty-Nine Hundred (2900) gallons per day, or Eighty-Six Thousand (86,000) gallons per month. There are no other major leaks in the LHWS known to the Receiver at this time. Normal water usage has been up slightly, as is typical for summer water usage on Renegade Mountain.

7. 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.² Both Renegade Mountain Community Club [hereinafter "RMCC"] and the Consumer Advocate and Protection division of the Tennessee Attorney General and Reporter's office have intervened in that matter,³ and RMCC filed a motion to abate the CCN Petition proceedings on December 19, 2017. Four (4) status conferences have been conducted, and the Commission has pushed out the hearing date in order to permit the parties to continue to work on the global negotiations referenced above. No definite date has been set for a hearing on the petition, and another status conference has been set for August 29, 2018.

² *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.

³ Pertinent documents relative to this matter may be found at the following website:
<http://share.tn.gov/tra/dockets/1700098.htm>.

8. Another potential suitor has expressed interest in the LHWS. Following the August 16, 2018 status conference in court, Mr. Sinor, along with an employee of the Crab Orchard Utility District familiar with the LHWS, travelled to Renegade Mountain to show an officer of this potential suitor different areas and parts of the LHWS, and answer any questions he may have. The visit lasted approximately a couple of hours.

9. On August 14, 2018, a fuse at the LHWS's pump station blew, causing a water outage for customers of the LHWS. A new fuse was installed by the Volunteer Electric Cooperative, and water service was restored later that day, but an air pocket was created in the main line which continued to inhibit the water pressure for those customers near the top of Renegade Mountain. That air pocket was eventually flushed out of the main pipe, but water pressure, especially for those customers near the top of Renegade Mountain, remains a problem. The Receiver continues to receive complaints from customers near the top of the mountain about a lack of water pressure in the LHWS. The Receiver intends to work with Mr. Gerald Williams, the LHWS's licensed operator, to determine whether any modifications to the LHWS can be made so as to improve the water pressure for those customers of the LHWS near the top of Renegade Mountain.

Current Financial Information

10. As of July 31, 2018, there was an accounts receivable past due balance of \$69,975.38.⁴ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

⁴ Of this amount, \$3862.29 is less than a month past due, and \$66,113.09 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.

11. As of July 31, 2018, the LHWS had a cash balance of \$21,481.13 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 July of 2018.⁵

Current Modified Accrual Basis Financial Documents & Current Estimated Surplus

12. 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. Having said that, as shown below, the LHWS has, as of July 31, 2018, accumulated a modest surplus and a \$5000.00 repair/maintenance reserve, and so the financial condition of the LHWS is improved since this time last year.⁶

13. 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 July 31, 2018; and (3) cash flow statements showing cash flow for the month of July 2018, and projected cash flows for the month of August 2018. A schedule of actual cash receipts and disbursements for July of 2018 for the LHWS is contained in a spreadsheet that is attached hereto as Exhibit D and is incorporated herein by reference.

⁵ 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.

⁶ See below, ¶ 14.

14. The Receiver now estimates that the LHWS will, on average, break slightly better than even each month.⁷ 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 LHWS with a surplus of \$11,729.23 as of July 30, 2018.⁸ The projected cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of August, 2018.

Fees and Expenses of Receiver

15. 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

16. 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 Ms. Jacqueline Lawson, Ms. Lauren Garcia, Ms. Jeanne Bryant, and Ms. Jere Cowan, performed work for this Receivership estate for the

⁷ 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.

⁸ See Collective Exhibit C.

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

period of July 1, 2018 through July 31, 2018 in the amount of \$1192.56.¹⁰ 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 July 1, 2018 through July 31, 2018 in the amount of \$1289.51. 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 July 1, 2018 through July 31, 2018 in the amount of \$324.00.

17. 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.

18. 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 2018: \$1192.56;
- b. for Mr. Sinor working under Mr. Moore for July of 2018: \$1289.51; and,
- c. for Mr. Matherne working under Mr. Moore for July of 2018: \$324.00.

19. 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

¹⁰ This figure includes incurred expenses, charged by Receivership Management, Inc., for the period of July 1, 2018 through July 31, 2018, which total \$56.26.

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 \$2806.07, 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 \$2482.07 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Commission on an interim basis in the amount of \$324.00 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: August 31, 2018.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: Robert E. Moore, Jr.
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.
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)

*by permission
Gross 44 OK
August 28, 2018*

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

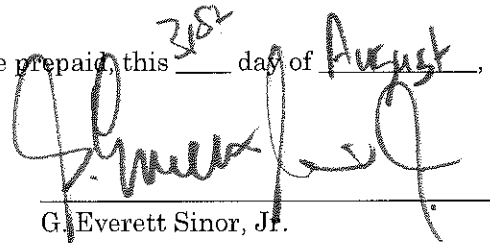
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
374 Forks of the River Parkway
Sevierville, Tennessee 37862

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.
Woolf, McClane
Counsel for Renegade Mountain CC
900 South Gay Street, Suite 900
Knoxville, Tennessee 37902

via the United States Mails, postage prepaid, this ^{30th} day of August, 2018.



G. Everett Sinor, Jr.

**Laurel Hills Water System In Receivership
A/R Aging Summary
As of July 31, 2018**

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BETTIS, MARTHA	0.00	0.00	89.07	0.00	0.00	89.07
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	2,416.17	2,758.89
BREG, DAVID & AUDREY	0.00	0.24	0.00	0.00	0.00	0.24
CHAMBERS, BARRY	0.00	92.13	0.00	0.00	0.00	92.13
CPCA (76)	0.00	2,513.28	2,513.28	1,620.96	52,479.15	59,126.67
JUDD, JONATHAN	0.00	114.24	114.24	0.02	0.00	228.50
LATHAM, KENT	0.00	114.24	114.24	114.24	1,348.77	1,691.49
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	114.24	0.00	342.72
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	2,034.21	2,376.93
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	2,034.21	2,376.93
LOUD, PAUL F.	0.00	114.24	114.24	0.00	0.00	228.48
MCQUEEN, DARRELL E	0.00	114.24	92.13	0.00	0.00	206.37
MILLER, DAVID	0.00	114.24	0.00	0.00	0.00	114.24
MURPHY, JEFF	0.00	114.24	114.24	0.00	0.00	228.48
RIFNER, DAVE	0.00	114.24	0.00	0.00	0.00	114.24
TOTAL	0.00	3,862.29	3,608.40	2,192.18	60,312.51	69,975.38

EXHIBIT
A

LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

7/31/2018

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	24,655.91	22,896.17
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(1,747.74)	
	<u>22,896.17</u>	<u>22,896.17</u>

23-Aug-18
12:16 PM

OUTSTANDING CHECKS	1199	297.74	
	1200	700.00	
	1204	750.00	
			<u>1,747.74</u>

EXHIBIT
B

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

ACCOUNT # 0232618611

Cycle 053
 Enclosures 26
 Page 0
 1 of 3

LIFEGREEN BUSINESS CHECKING
 June 30, 2018 through July 31, 2018

SUMMARY

Beginning Balance	\$19,636.71	Minimum Balance	\$19,279
Deposits & Credits	\$10,738.07 +	Average Balance	\$23,336
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$5,718.87 -		
Ending Balance	\$24,655.91		

DEPOSITS & CREDITS

07/09	Deposit - Thank You	228.99
07/10	Deposit - Thank You	7,197.12
07/18	Deposit - Thank You	1,713.36
07/30	Deposit - Thank You	1,598.60
Total Deposits & Credits		\$10,738.07

CHECKS

Date	Check No.	Amount	Date	Check No.	Amount
07/02	1188	357.34	07/26	1194 *	1,375.00
07/16	1189	750.00	07/25	1196 *	300.00
07/12	1190	201.00	07/27	1198 *	770.42
07/16	1191	1,965.11			
Total Checks					\$5,718.87

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance	Date	Balance
07/02	19,279.37	07/16	23,789.37	07/26	23,827.73
07/09	19,508.36	07/18	25,502.73	07/27	23,057.31
07/10	26,705.48	07/25	25,202.73	07/30	24,655.91
07/12	26,504.48				

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



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21481.13

Regions Bank
Brentwood
329 Franklin RD
Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
783 OLD HICKORY BLVD STE 255
BRENTWOOD TN 37027-4506

ACCOUNT # 0232618611

	053
Cycle	26
Enclosures	0
Page	2 of 3

**EFFECTIVE 6-20-18 THERE IS NO LONGER
A FEE FOR AVAILABLE-FOR-PROCESSING-
TONIGHT MOBILE DEPOSITS ON ACTIVE
ACCOUNTS IN GOOD STANDING.**

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 PRAUTHORIZED DEPOSIT, PLEASE CALL 1-800-REGIONS (734-4667) 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

Estimated Monthly Income Statement - LHWS*

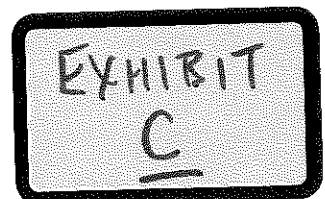
Income

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

Expenses

CNA Insurance & AJG Brokerage Fee	\$653.00	
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		\$10,428.00
Projected Monthly Income (Deficit)		\$622.00

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



LHWS Balance Sheet (as of 7/31/2018) - Modified Accrual Basis*

Current Assets

Cash	\$22,896.17	
Prepaid GL Insurance Payment (CNA & AJG)	\$186.42	
Prepaid Expense - TDEC Fees	\$300.00	
Prepaid Estimated Income Tax for 2018	<u>\$3,900.00</u>	
Total Current Assets		\$27,282.59

Liabilities

Payable - Lansford & Stephens (July Bill)	\$300.00	
Payable - Gerald Williams (July Bill)	\$750.00	
Payable - Crab Orchard Utility District (July Bill)	\$1,415.04	
Payable - May 2018 F&E RMI & Sinor	\$3,911.17	
Payable - June 2018 F&E RMI & Sinor	\$1,528.08	
Payable - July 2018 F&E RMI & Sinor	\$2,482.07	
Reserve (Lansford & Stephens - 2018 Tax Form Prep.)	\$100.00	
Reserve (MicroBac)	\$67.00	
Reserve (Repairs/Maintenance)	<u>\$5,000.00</u>	
Total Liabilities		<u>\$15,553.36</u>
Surplus (Deficit)		\$11,729.23

* 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 2018

Starting Balance (6/30/2018)		\$19,267.37
Deposits in July 2018	\$10,738.07	
Cash Inflows		<u>\$10,738.07</u>
Current Assets PLUS Cash Inflows		\$30,005.44
Volunteer Electric Cooperative	\$297.74	
Lansford & Stephens (acct/bookkeeping fee - June 2018)	\$300.00	
Lansford & Stephens (2017 tax work)	\$400.00	
Gerald Williams (May & June 2018 Bill)	\$1,500.00	
General Liability Insurance Payment to CNA/AIG	\$2,145.42	
Microbac	\$201.00	
TDEC	\$300.00	
Crab Orchard Utility District (June Bill)	<u>\$1,965.11</u>	
Cash Outflows		<u>\$7,109.27</u>
Ending Balance (7/31/2018)		\$22,896.17

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

Projected Cash Flow for August 2018

Starting Balance (7/31/2018)		\$22,896.17
Projected Deposits in August 2018	\$11,050.00	
Projected Cash Inflows		<u>\$11,050.00</u>
Current Assets PLUS Cash Inflows		\$33,946.17
Volunteer Electric Cooperative (for August 2018)	\$600.00	
Lansford & Stephens (acct/bookkeeping fee - for July 2018)	\$300.00	
Gerald Williams (for July 2018)	\$750.00	
Crab Orchard Utility District (for July 2018)	\$1,415.04	
General Liability Insurance Payment to CNA/AJG (2nd installment)	\$1,896.00	
May 2018 RMI & Sinor Fees and Expenses	\$3,911.17	
June 2018 RMI & Sinor Fees and Expenses	<u>\$1,528.08</u>	
Projected Cash Outflows		<u>\$10,400.29</u>
Projected Ending Balance (8/31/2018)		\$23,545.88

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

LHWD CASH RECEIPTS (DISBURSEMENTS)
7/1/18 Through 7/31/18

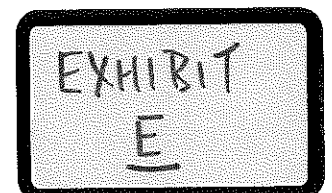
8/23/18

Date	Account	Num	Description	Memo	Amount
			EXPENSES		
			Uncategorized		
7/12/18	REGIONS LHWD 02326186...	1192			0.00
7/13/18	REGIONS LHWD 02326186...	1193			0.00
7/17/18	REGIONS LHWD 02326186...	1195			0.00
7/21/18	REGIONS LHWD 02326186...	1197			0.00
			TOTAL Uncategorized		0.00
			2185-OUTSIDE CONTRACTORS		
			201805		
7/20/18	REGIONS LHWD 02326186...	1196	TN DEPT OF ENVIRONMENT & CONSERVATION	INV.000470065	-300.00
			TOTAL 201805		-300.00
			TOTAL 2185-OUTSIDE CONTRACTORS		-300.00
			4010-WATER BILL RECEIPTS		
7/5/18	REGIONS LHWD 02326186...	DEP	DEPOSIT		228.99
7/9/18	REGIONS LHWD 02326186...	DEP	DEPOSIT		7,197.12
7/18/18	REGIONS LHWD 02326186...	DEP	DEPOSIT		1,713.36
7/30/18	REGIONS LHWD 02326186...	DEP	DEPOSIT		1,598.60
			TOTAL 4010-WATER BILL RECEIPTS		10,738.07
			5695-FEES ACCOUNTING		
7/31/18	REGIONS LHWD 02326186...	1200	LANSFORD & STEPHENS	2017 TAX RETURN JUNE 2018	-400.00
			TOTAL 5695-FEES ACCOUNTING		-300.00
			5697-OTHER CONTRACT LABOR		
7/5/18	REGIONS LHWD 02326186...	1189	GERALD WILLIAMS	INV 447; MAY 2018	-750.00
7/31/18	REGIONS LHWD 02326186...	1204	GERALD WILLIAMS		-750.00
			TOTAL 5697-OTHER CONTRACT LABOR		-1,500.00
			6290-UTILITIES		
7/5/18	REGIONS LHWD 02326186...	1190	MICROBAC	INV RA8F01295	-201.00
7/5/18	REGIONS LHWD 02326186...	1191	CRAB ORCHARD UTILITY DISTRICT	0001-00900-001	-1,965.11
7/27/18	REGIONS LHWD 02326186...	1199	VOLUNTEER ENERGY COOPERATIVE		-297.74
			TOTAL 6290-UTILITIES		-2,463.85
			6340-INSURANCE EXPENSE		
7/13/18	REGIONS LHWD 02326186...	1194	CNA INSURANCE	6024574369	-1,375.00
7/18/18	REGIONS LHWD 02326186...	1198	ARTHUR J. GALLAGHER	GL POLICY INSTALLMENT	-770.42
			TOTAL 6340-INSURANCE EXPENSE		-2,145.42
			TOTAL EXPENSES		3,628.80
			OVERALL TOTAL		3,628.80



**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - JULY 2018**

<u>Jeanne Barnes Bryant</u>	
July 2018 Fees & Overhead Exp.	\$146.70
<u>Receivership Management, Inc.</u>	
July 2018 Fees & Overhead Exp.	\$989.60
July 2018 Expenses	\$56.26
<u>Everett Sinor</u>	
July 2018 Fees & Expenses	<u>\$1,289.51</u>
Proposed Payment out of Receivership Estate	\$2,482.07
<u>Graham Matherne</u>	
July 2018 Fees & Expenses	<u>\$324.00</u>
Proposed Interim Taxation of Costs	\$324.00



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT				July 2018	
7/2/2018	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE INVOICES	0.1	\$163.00	\$16.30
7/6/2018	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS	0.1	\$163.00	\$16.30
7/10/2018	Jeanne Barnes Bryant	REVIEW INVOICE, EMAIL RE SAME TO AND FROM JACQUI LAWSON	0.2	\$163.00	\$32.60
7/16/2018	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT, REVIEW SAME, QUESTION RE WILLIAMS PAYMENT	0.3	\$163.00	\$48.90
7/20/2018	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT	0.1	\$163.00	\$16.30
7/24/2018	Jeanne Barnes Bryant	REVIEW AND SIGN CHECK	0.1	\$163.00	\$16.30
Total					\$146.70

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		July 2018		
7/2/2018	Jacqui D. Lawson	APPROVAL OF INVOICES FOR PAYMENTS- BANK RECON INSPECT ASSET & LIABILITY ACCOUNTS FOR PROPER BACKUP	\$79.00	\$79.00
7/2/2018	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUALS	\$79.00	\$15.80
7/2/2018	Robert E. Moore, Jr.	REVIEW MICROBAC STATEMENT AND QUALITY REPORT, REFER TO E.SINOR AND G.WILLIAMS 2	\$153.00	\$30.60
7/4/2018	Jacqui D. Lawson	APPROVE INVOICES FOR PAYMENT; ANALYZE GL & TB	\$79.00	\$59.25
7/5/2018	Jere P. Cowan	RECEIPT POST AND PROCESS EXPENSE PAYMENT; FORWARD SAME	\$79.00	\$31.60
7/11/2018	Lauren B. Garcia	EMAIL TO HEATHER RE JUNE DEPOSIT DETAILS; POST JUNE DEPOSITS AND RECONCILE ACCOUNT; PREPARE JUNE FINANCIAL EXHIBITS FOR COURT REPORT, POST FEES AND EXPENSES	\$79.00	\$102.70
7/12/2018	Jacqui D. Lawson	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. RECONCILE ACCOUNT THROUGH 6/30/18 AND PAY CURRENT BILLS. CALL E. SINOR TO DISCUSS PAYMENT SCHEDULE OF INSURANCE.	\$79.00	\$79.00
7/12/2018	Jere P. Cowan	MEMO FROM J. LAWSON RE: INSURANCE PAYMENT; REVIEW SAME AND CHANGES TO SAME; CONFERENCE WITH J. LAWSON RE: SAME	\$79.00	\$7.90
7/13/2018	Jere P. Cowan	CONFERENCE WITH J. LAWSON RE: INSURANCE PAYMENT; REVIEW AND PROCESS SAME; FORWARD FOR J. BRYANT APPROVAL; FORWARD SAME	\$79.00	\$31.60
7/16/2018	Jacqui D. Lawson	RESPOND TO EMAILS FROM E. SINOR; OBTAIN INFORMATION NEEDED FOR REPORT; MAKE CORRECTIONS TO PREVIOUS INFORMATION; REVIEW ROUGH DRAFT OF 26TH REPORT & FINANCIALS TO FINALIZE (.50)	\$79.00	\$158.00

LAUREL HILLS WATER DISTRICT

July 2018

Date	Name	Description	Hours	Rate	Total
7/16/2018	Lauren B. Garcia	REVIEW MAY AND JUNE FINANCIAL EXHIBITS, EMAIL TO/FROM J.LAWSON AND E SINOR RE EXP RECOVERABLE; GERALD WILLIAMS INVOICES, PREPARE AND SCAN RMI EXP RECOV TO SINOR	1	\$79.00	\$79.00
7/17/2018	Jere P. Cowan	EMAIL FROM J. LAWSON RE: INSURANCE PAYMENT; EMAIL FROM E. SINOR RE: SAME	0.1	\$79.00	\$7.90
7/19/2018	Jere P. Cowan	EMAIL FROM R. MOORE APPROVING REPORT; EMAIL FROM E. SINOR RE: PROJECTED CASH FLOW STATEMENT; EMAIL FROM E. SINOR RE: MOORE AFFIDAVIT; PREPARE AND FORWARD TO R. MOORE; FORWARD EXECUTED AFFIDAVIT TO SINOR	0.4	\$65.00	\$26.00
7/19/2018	Robert E. Moore, Jr.	REVIEW AND RESPOND TO EMAIL FROM E.SINOR RE: INTERESTED PARTY IN WATER SYSTEM .10	0.1	\$153.00	\$15.30
7/19/2018	Robert E. Moore, Jr.	REVIEW AND APPROVE ACTIVITY REPORT .25	0.25	\$153.00	\$38.25
7/20/2018	Jacqui D. Lawson	EMAIL KELLY OVER INSURANCE PAYMENTS;	0.5	\$79.00	\$39.50
7/20/2018	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; CONFERENCE WITH R. MOORE AND J. LAWSON RE: SAME; FORWARD SAME	0.4	\$79.00	\$31.60
7/23/2018	Jere P. Cowan	EMAIL RE: EXPENSE INVOICE PAYMENT	0.1	\$79.00	\$7.90
7/23/2018	Lauren B. Garcia	EMAIL TO JLAWSON AND RMOORE RE OUTSTANDING WYATT BALANCE, ORDER CHECKS	0.2	\$79.00	\$15.80
7/23/2018	Lauren B. Garcia	MEMO FROM R. MOORE RE WYATT OS BILLS, REVIEW ACCTS PAYABLES, EMAIL TO JLAWSON RE SUCH	0.2	\$79.00	\$15.80
7/24/2018	Jere P. Cowan	RECEIPT, POST AND PROCESS INVOICE EXPENSES RECEIVED; FORWARD SAME FOR APPROVAL AND FORWARD	0.3	\$79.00	\$23.70
7/27/2018	Jere P. Cowan	EMAIL FROM E. SINOR SENDING FILED COURT REPORT	0.1	\$65.00	\$6.50
7/30/2018	Jacqui D. Lawson	DISCUSSION WITH NANCY AT LANSFORD & STEPHENS; DISCUSSION WITH E. SINOR OVER INVOICES & PROJECTIONS	0.5	\$79.00	\$39.50
7/31/2018	Jere P. Cowan	RECEIPT; POST AND PROCESS EXPENSE PAYMENTS; FORWARD SAME TO J. BRYANT FOR APPROVAL; FORWARD	0.6	\$79.00	\$47.40
Total					\$989.60

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

AUGUST 7, 2018
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1062742

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 JULY 31, 2018

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$324.00
TOTAL THIS INVOICE	\$324.00
PREVIOUSLY BILLED AND OUTSTANDING	\$13,863.20
TOTAL AMOUNT DUE	\$14,187.20

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 7, 2018
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1062742

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 JULY 31, 2018

07/05/18	E-MAIL FROM E. SINOR REGARDING STATUS ISSUES AND REGARDING CONDEMNATION MATTERS (.10); REVIEW CONDEMNATION ISSUES (.40). J. GRAHAM MATHERNE .50 hours at 270.00 per hour.	135.00
07/13/18	TELEPHONE CONFERENCE WITH E. SINOR REGARDING STATUS ISSUES AND RELATED MATTERS. J. GRAHAM MATHERNE .10 hours at 270.00 per hour.	27.00
07/24/18	E-MAIL FROM E. SINOR REGARDING DISCUSSIONS WITH A. CONKLIN AND OTHERS REGARDING LHWS ISSUES (.10); REVIEW FILES REGARDING STATUS AND MATTERS NEEDED FOR SETTLEMENT/CLOSING (.30). J. GRAHAM MATHERNE .40 hours at 270.00 per hour.	108.00
07/26/18	REVIEW REPORT TO COURT REGARDING STATUS AND FEE APPROVAL. J. GRAHAM MATHERNE .20 hours at 270.00 per hour.	54.00

TOTAL SERVICES

1.20 \$324.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC
MATTER NUMBER: 008264.000036
INVOICE NO.: 1062742

Aug 7, 2018
PAGE 3

TOTAL THIS INVOICE	\$324.00
PREVIOUSLY BILLED AND OUTSTANDING	\$13,863.20
TOTAL AMOUNT DUE	\$14,187.20

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEEES
J MATHERNE PARTNER	270.00	1.20	324.00

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

August 13, 2018

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

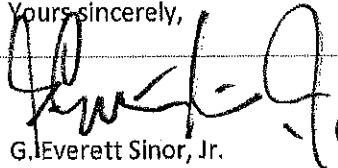
RE: July 2018 Billings – RMI/Laurel Hills Water System in Receivership

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>
7/2/2018	Review G Williams invoice & forward to J Lawson & R Moore; Review R Moore email re Microbac invoice; forward same to J Lawson & G Williams w comment; review L&S email re deposit and A/R summary	0.1		
7/5/2018	Review M Hargis email on premium; forward same to R Moore for review; V.M. for G Williams; T.C. w G Williams re LHWS matters; email to R Moore re conversation with G Williams	0.5		
7/9/2018	Email to J Lawson re request for docs	0.1		
7/10/2018	Email from J Lawson re 6/30 financial information & response	0.1		
7/11/2018	Review of J Lawson email responses	0.1		
7/12/2018	Email from M Hargis re insurance; forward same to R Moore & J Lawson; messages or J Lawson & R Moore re insurance	0.1		
7/13/2018	T.C. w G Matherne re updates; email to J Lawson re L&S payments; preparation work on financials	1.0		
7/15/2018	Complete financials for May and June	0.9		
7/16/2018	work on 26th report; Emails to J Lawson re same; T.C. w R Moor re payment schedule for Insurance; numerous T.C. w K Watson w AJG re insurance payment schedule and invoicing; email J Bryant & R Moore draft of 26th report	2.2		
7/17/2018	Email w invoice and address for payment of GL insurance invoice to J Cowan & J Lawson	0.1		
7/19/2018	V.M. for R Moore; T.C. w R moore re 26th report; Email to K Cashman-Grams with draft of report; email to J Lawson & L Garcia re cash flow projection; email from LHWS potential suitor; forward same to R Moore w comment	0.6		
7/20/2018	Email for R Moore re inquiry from potential suitor for LHWS; response from R Moore and email to A Conklin re same; email from A Conklin re same	0.2		
7/23/2018	T.C. w R Moore re potential suitor	0.1		
7/24/2018	T.C. w potential suitor for LHWS; T.C. w R Moore re same; T.C. w A Conklin re same; T.C. w G Williams about potential meeting and LHWS issues; email to G Matherne & R Moore re same; email to potential suitor confirming meeting date and time	1.0		

7/25/2018	Email from potential suitor re: meeting time	0.1		
7/26/2018	completion of 26th report	0.3		
7/27/2018	review of Volunteer Electric bill from J Lawson; T.C. w J Lawson re cash flow statement; letter to TDEC re: certified operator	0.6		
7/31/2018	Review deposit detail from L&S; T.C. w Heather w L&S re invoice for services; emails from T Stephens re taxes and invoices; emails from J Lawson re cash flow statement payments & L&S invoice	0.3		
	Hourly Billing Total	8.4	\$140.00	\$1,176.00
			<u>Miles</u>	<u>Rate</u>
	Mileage Total	0.0	\$0.47	\$0.00
7/26/2018	Postage for 26th Report		<u>\$113.51</u>	
	Other Expenses Reimburseable Total			<u>\$113.51</u>
Balance Owed this month				\$1,289.51
	Previous Balance Owed		\$3,174.21	
	Total Amount Due and Payable			\$4,463.72

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

07/26/18 05:36 PM

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shipping, postal and business needs.



Receipt ID 83997762846997883305 394 Items
CSH: ALECIA Tran: 0135 Reg: 001

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postage &
copies*

001	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUU64MG0U		
002	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUUJPCBT		
003	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUUT5C3PD		
004	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUU74P99N		
005	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUUTA9DZD		
006	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUUHAMWDC		
007	008237 (022)	TO \$	5.17
	First Class Package		
	Tracking# MMWJNUUY58NF4		
008	036001 (003)	T1 \$	49.14
	8.5 X 11 Copies	QTY 378	
	Reg Unit Price	\$ 0.13	
009	500005 (025)	T1 \$	6.93
	Manilla Med 12X9	QTY 7	
	Reg Unit Price	\$ 0.99	
010	001040 (001)	TO \$	12.73
	Ground Commercial		
	Tracking# 1Z303Y3Y0380356415		
011	020587 (002)	T1 \$	3.05
	12x9x3 Box		

SubTotal \$ 108.04
State and County Tax (T1) \$ 5.47
Total \$ 113.51

MASTERCARD \$ 113.51
ACCOUNT NUMBER * *****6943
Appr Code: 05387Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: 3BA06460BA2758E8
ARC: 00

RMI EXP RECOVERABLE LHWD
7/1/18 Through 7/31/18

Category Description	7/1/18-7/31/18	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-146.70	-146.70
5610-CONTRACT LABOR RMI	-989.60	-989.60
TOTAL 5100 FEES RMI	-1,136.30	-1,136.30
5150 FEES LEGAL		
5400-LEGAL FEES	-1,613.51	-1,613.51
TOTAL 5150 FEES LEGAL	-1,613.51	-1,613.51
5300 EXPENSE		
6060-RENT	-35.46	-35.46
6205-COPIES	-15.10	-15.10
6210-POSTAGE	-5.70	-5.70
TOTAL 5300 EXPENSE	-56.26	-56.26
OVERALL TOTAL	-2,806.07	-2,806.07

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 July 1, 2018 through July 31, 2018, 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 AFFLIANT SAITH NOT.

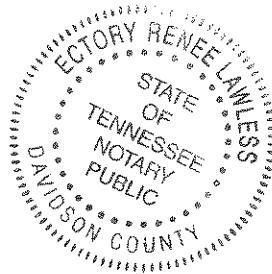

KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

28th day of August, 2018.


NOTARY PUBLIC

My commission expires: 3/8/2022



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 July 1, 2018 through July 31, 2018 that are contained in the Receiver's motion.

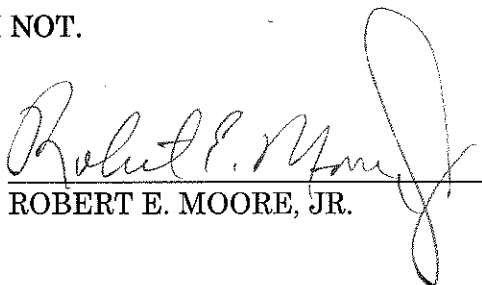
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide 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 \$2428.07 (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 \$324.00 (i.e., the amount of fees and expenses attributable to Mr. Matherne set forth in the Receiver's Motion).

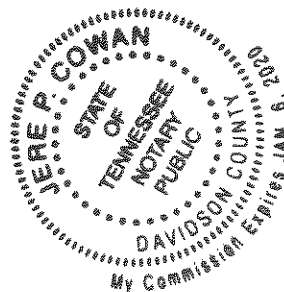
FURTHER THE AFFIANT SAITH NOT.


ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

20th day of August, 2018.


Notary Public
Commission Expires: 1/6/2020



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 September, 2018, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for July of 2018, 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 \$2806.07.

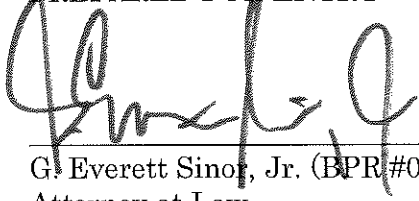
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$2482.07 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 \$324.00.

ENTERED this ___ day of _____, 2018.

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



G. Everett Sinor, Jr. (BPR #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

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

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

Roger York, Esq.
York & Billbrey
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, Tennessee 37862

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

via the United States Mails, postage prepaid, this ____ day of _____, 2018.