

G. EVERETT SINOR, JR.
Attorney at Law

January 16, 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-Second 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,

A handwritten signature in black ink, appearing to read "G. Sinor, Jr.", written over a horizontal line.

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

Enclosures

cc: 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,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

Date 1-18 FILED 2018 at 3:25
AM
PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY LT

RECEIVER'S TWENTY-SECOND 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-Second 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. As previously reported, the Receiver filed a motion for the Court to adopt its First Modified Receivership Plan with this Honorable Court on November 27, 2017. An order has been presented to the Court for the hearing on the Receiver's motion to approve its First Modified Receivership Plan to be heard in Crossville on February 20, 2018 at 9:00 a.m.

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, November 28, 2017, and December 13, 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 November of 2017, 89 of the 123 customers of the LHWS timely paid their water bill. Of the 34 non-paying customers, 19 are in the Cumberland Pointe condominium units, and 15 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, one (1) of the Cumberland Pointe buildings burnt to the ground on the evening/early morning of September 3-4, 2017, resulting in the total LHWS customer base being adjusted downward from 131 to 123.³ Photographs of the charred remains of that building are attached hereto as Exhibit A and are incorporated herein by reference. Mr. Sinor spoke with the Treasurer of the Cumberland Pointe Property Owners Association, Mr. Dave Carter. Mr. Carter indicated that the Cumberland Pointe Property Owners Association had no plans to rebuild the burnt building at this time,

³ See the Receiver's Nineteenth and Twentieth Reports, filed on October 10, 2017 and November 28, 2017, respectively.

but that the POA itself would need to make a decision on how it would proceed in the future.

9. As previously reported, Mr. Williams repaired a significant leak in one of the main service lines, which has resulted in reduced wholesale water and electric bills for the LHWS. In particular, Mr. Williams was working on locating a cut-off valve when he discovered a service line right off of the Renegade Mountain Parkway main line that was a curved piece of 1 inch pvc pipe leading to a residence. That pvc pipe had a leak at the bottom of the pipe and the water was leaking straight into the ground and was thus not discoverable merely by ground sensing equipment. Mr. Williams repaired the leak with a clamp and re-buried the pipe. Mr. Sinor traveled to Renegade Mountain on December 29, 2017 and viewed the area of the leak; a photograph of the area where the leak was discovered and repaired is attached hereto as Exhibit B and is incorporated herein by reference.⁴ Other, smaller leaks to service lines have also been repaired by Mr. Williams.

10. Also, Mr. Sinor inspected two (2) separate areas of paving work that have been performed on Renegade Mountain, the first near the residence of Mr. Paul Loud, the second at the entrance of one of the Laurel Hills Condominiums buildings; this paving work has been previously reported to the Court.⁵ Photographs of the work that was performed is attached hereto as Exhibit C and is incorporated herein by reference. Monies to pay for this work were taken from a repair reserve established starting in April of 2017.⁶

⁴ As previously reported, the LHWS's wholesale water bill from the Crab Orchard Utility District has been substantially reduced since the repair of this leak. See Exhibit D, attached hereto and incorporated herein by reference, for the COUD wholesale water bill for the last six (6) months, as well as a schedule of the amount of the wholesale water bill and the number of gallons purchased.

⁵ See Receiver's Twentieth Report, p.4, ¶ 8, filed November 28, 2017.

⁶ See Receiver's Fourteenth Report, p. 5, ¶ 15, filed on April 18, 2017.

11. Mr. Williams reports that it may be advisable to purchase a new pump for the LHWS to pump water through the water system. Currently, the LHWS utilizes two (2) different 10 horsepower pumps⁷, which are alternated so as to lengthen their useful life; however, one (1) of those pumps does not provide consistent, solid pressure for LHWS customers at or near the top of the mountain. Mr. Williams indicates that the Receiver should consider the purchase of another 10 horsepower pump that would provide 360 feet of head pressure to pump 30 gallons per minute (similar to the LHWS's current active pumps). The new pump would need to be variable speed so as to prevent the over-pressurization of the main lines and service lines. Mr. Williams estimates that a new pump with these attributes would cost approximately \$3000.00; if possible, monies reserved for repairs and maintenance would be utilized for this purchase.

12. Furthermore, a severe and prolonged cold snap was experienced up on Renegade Mountain, starting on Saturday, December 30, 2017, with nighttime temperatures consistently falling into the single digits Fahrenheit. Consistent with practice, all LHWS water service was cut-off starting on that date. Given the length of the cold snap, Mr. Williams turned the water on for a day (Wednesday, January 3, 2018), and then cut the water back off that evening so that LHWS customers could have water for a day and the service lines could be filled. The cold snap lasted until Sunday, January 7, 2018, when full water service was restored. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

13. Survey work has been completed by the Receiver on the supply pipe running up to the top of Renegade Mountain. A report from the surveyor is expected shortly. As of

⁷ The LHWS also owns a 70 horsepower pump; however, that pump was designed to pump water into the water storage tank at the top of the mountain. Mr. Williams informs the Receiver that this pump is too powerful to utilize currently as it would blow the pipes. The Receiver previously misreported the horsepower of the LHWS's current pumps by mistake. See the Receiver's First Report, p. 2, ¶¶ 5-6, filed December 11, 2015.

the date of this report, the surveyor has been paid \$4800.00 for his work; however, an additional \$5200.00 has been reserved, given the difficulties he encountered and the additional costs attendant to those difficulties.

14. 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.⁸ 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.⁹ The exchange of discovery has occurred and the discovery periods established in the Commission's scheduling order have passed. Statements of Position have also been filed. RMCC filed a motion to abate the CCN Petition proceedings on December 19, 2017. That motion was considered by the Commission on December 21, 2017, and all scheduling deadlines have been pushed back approximately forty-five (45) days, with no definite date having been set for a hearing on the petition.

15. 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 originally continued by the Court with the agreement of the parties until December 20, 2017. An order has been submitted for the Court's consideration to again continue the status conference date (and the consideration of numerous motions filed in the instant matter) to February 20, 2018 at 9:00 a.m. in Crossville.

⁸ *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.

⁹ Pertinent documents relative to this matter may be found at the following website: <http://share.tn.gov/tra/dockets/1700098.htm>.

Current Financial Information

16. As of November 30, 2017, there was an accounts receivable past due balance of \$49,167.98.¹⁰ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit E and is incorporated herein by reference.

17. As of November 30, 2017, the LHWS had a cash balance of \$31,785.37 in its main operating account; see Collective Exhibit F, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in November of 2017.¹¹

Current Modified Accrual Basis Financial Documents & Current Estimated Surplus

18. 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.

19. The Receiver has generated a number of internal, unaudited financial documents prepared on a modified accrual basis, which are attached hereto as Collective Exhibit G 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 November 30, 2017; and (3) a cash flow statement showing projected cash flows for the month of December, 2017. Actual cash receipts and disbursements for November of 2017 for the LHWS are contained in a spreadsheet that is attached hereto as Exhibit H and is incorporated herein by reference.

¹⁰ Of this amount, \$3882.08 is less than a month past due, and \$45,285.90 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 E.

¹¹ 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.

20. The Receiver now estimates that the LHWS will, on average, break even each month.¹² 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 \$8549.33 surplus as of November 30, 2017.¹³ The projected cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of December, 2017.

Fees and Expenses of Receiver

21. 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.¹⁴

22. As shown in Collective Exhibit I, 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

¹² 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 G.

¹³ Surplus is significantly lower as of November 30, 2017 as opposed to October 31, 2017. This is due primarily to a change in the reserve for the supply pipe survey work. An additional \$5000.00 has been added to that reserve given the difficulty of surveying the supply pipe.

¹⁴ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

Bryant, and Ms. Jere Cowan, performed work for this Receivership estate for the period of November 1, 2017 through November 30, 2017 in the amount of \$966.00¹⁵ 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 I for the period November 1, 2017 through November 30, 2017 in the amount of \$4882.15. 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 I for the period November 1, 2017 through November 30, 2017 in the amount of \$2106.00.

23. 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 J and incorporated herein by reference; *see also* Affidavit of Robert E. Moore, Jr., attached hereto as Exhibit K and incorporated herein by reference.

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

- a. for Mr. Moore & others at the Receiver for November of 2017: \$966.00;
- b. for Mr. Sinor working under Mr. Moore for November of 2017: \$4882.15; and,
- c. for Mr. Matherne working under Mr. Moore for November of 2017: \$2106.00.

25. 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

¹⁵ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of November 1, 2017 through November 30, 2017, which total \$163.15.

necessary, absent question raised by the Court upon its review. Submitted herewith is a proposed Order Granting Motion for Approval of Fees and Expenses for the Court's consideration if no opposition is filed.

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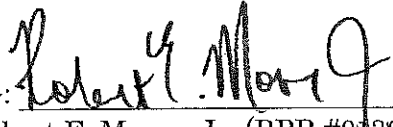
Motion for Approval of Fees and Expenses and Authorization for Payment

Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the fees and expenses as set forth herein in the aggregate amount of \$7954.15, 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 \$5848.15 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Commission on an interim basis in the amount of \$2106.00 (constituting the amount of Mr. Matherne's fees and expenses).

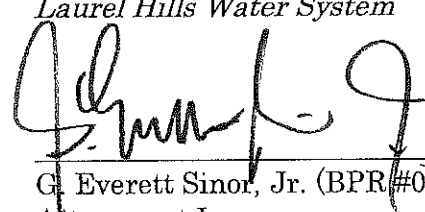
DATED: January 16, 2018.

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*

*by permission
granted on 1/4/18*


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)

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing report and motion¹⁶ 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

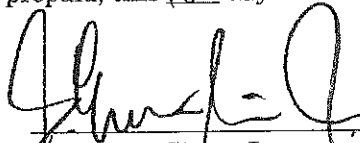
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
374 Forks of the River Parkway
Sevierville, TN 37862

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

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

via the United States Mails, postage prepaid, this 16th day of January, 2018.


G. Everett Sirjor, Jr.

¹⁶ Copies of exhibited photographs were not provided with these copies but are available with the original report filed with the Cumberland County Clerk and Master.

**EXHIBIT A ON FILE WITH THE
CUMBERLAND COUNTY CLERK AND MASTER**

EXHIBIT B ON FILE WITH THE
CUMBERLAND COUNTY CLERK AND MASTER

EXHIBIT C ON FILE WITH THE
CUMBERLAND COUNTY CLERK AND MASTER

LHWS COUD Wholesale Water Invoices
(5/19/2017-11/19/2017)

<u>Reading Month</u>	<u>Amount</u>	<u>Gallons Used</u>
June 2017	\$2,829.77	734200
July 2017	\$3,539.25	918900
August 2017	\$3,273.05	849600
September 2017	\$1,077.78	278100
October 2017	\$1,046.28	269900
November 2017	\$1,380.47	356900
Average (June-Aug 2017)	\$3,214.02	834233
Average (Sept-Nov 2017)	\$1,168.18	301633

EXHIBIT
D

CRAB ORCHARD
UTILITY DISTRICT
2089 East First Street
Crossville, TN 38555



Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$2,829.77
Due Date: 7/15/2017
After Due Date Please Pay: \$3,087.61

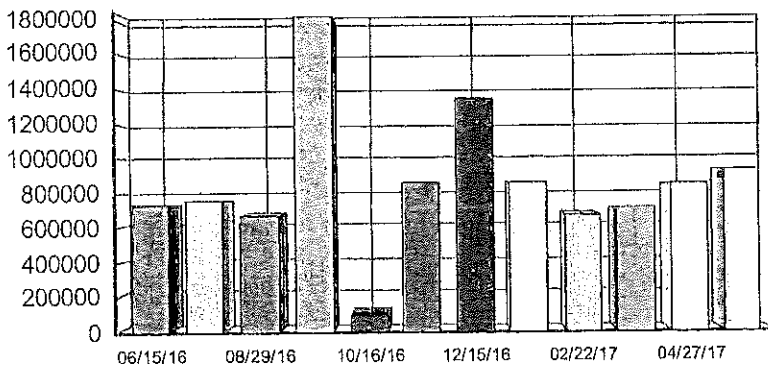
DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WA WATER	1015340	05/19 - 06/15	1777500	2511700	734200	\$2,578.38
ST State Tax						\$251.39

Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm.
Failure to receive bill or late notice does not exempt from paying bill penalty or having service disconnected. Adjustments must be paid in 30 days. Rates available on request.

Net Due	\$2,829.77
Due Date	7/15/2017
Pay After Due Date	\$3,087.61

Current Billing Period		
Days	Total Usage	Daily Average
27	734200	27192.59



PLEASE NOTE: We have updated to a new bill presentment and payment system.

It will require you to set up a new online login by visiting www.craborchardutility.com and clicking the "Pay Online" link.

BOC Monthly Meeting
2nd Tuesday 5:00 p.m.
at the district office

"This institution is an equal opportunity provider and employer."
Visit our website at: www.craborchardutility.com

See back of bill for
2016 Consumer Confidence Report details.

RETAIN THIS PORTION FOR YOUR RECORDS

**CRAB ORCHARD
UTILITY DISTRICT**
2089 East First Street
Crossville, TN 38555



Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$3,539.25
Due Date: 8/15/2017
After Due Date Please Pay: \$3,861.73

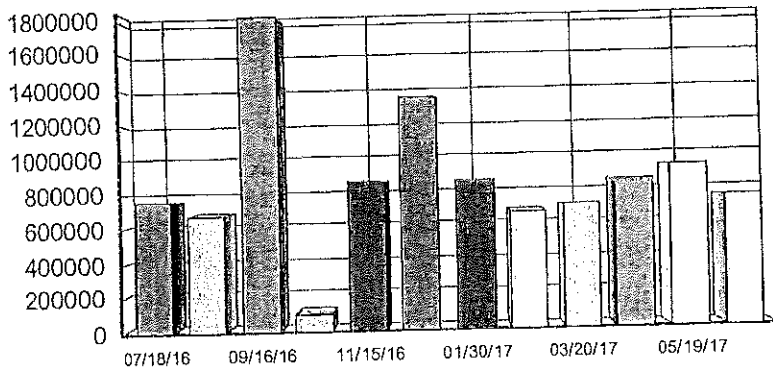
DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WA WATER ST State Tax	1015340	06/15 - 07/20	12511700	3430600	918900	\$3,224.83 \$314.42

Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm.
Failure to receive bill or late notice does not exempt from paying bill penalty or having service disconnected. Adjustments must be paid in 30 days. Rates available on request.

Net Due	\$3,539.25
Due Date	8/15/2017
Pay After Due Date	\$3,861.73

Current Billing Period		
Days	Total Usage	Daily Average
35	918900	26254.29



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**CRAB ORCHARD
UTILITY DISTRICT**
2089 East First Street
Crossville, TN 38555



Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$3,273.05
Due Date: 9/15/2017
After Due Date Please Pay: \$3,571.28

**** ESTIMATED ****

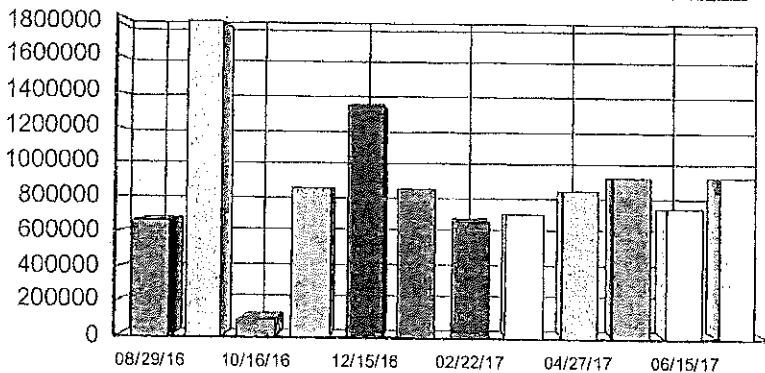
DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WAE WATER	1015340	07/20 - 08/29	13430600	4280200	849600	\$2,982.28
STE State Tax						\$290.77

Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm.
Failure to receive bill or late notice does not exempt from paying bill penalty or having
service disconnected. Adjustments must be paid in 30 days. Rates available on request.

Net Due	\$3,273.05
Due Date	9/15/2017
Pay After Due Date	\$3,571.28

Current Billing Period		
Days	Total Usage	Daily Average
40	849600	21240.00



PLEASE NOTE: We have updated to a new bill presentment and payment system.
It will require you to set up a new online login by visiting www.craborchardutility.com and clicking the "Pay Online" link.

BOC Monthly Meeting
2nd Tuesday 5:00 p.m.
at the district office

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2016 Consumer Confidence Report details.

RETAIN THIS PORTION FOR YOUR RECORDS

**CRAB ORCHARD
UTILITY DISTRICT**
2089 East First Street
Crossville, TN 38555



Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$1,077.78
Due Date: 10/15/2017
After Due Date Please Pay: \$1,175.98

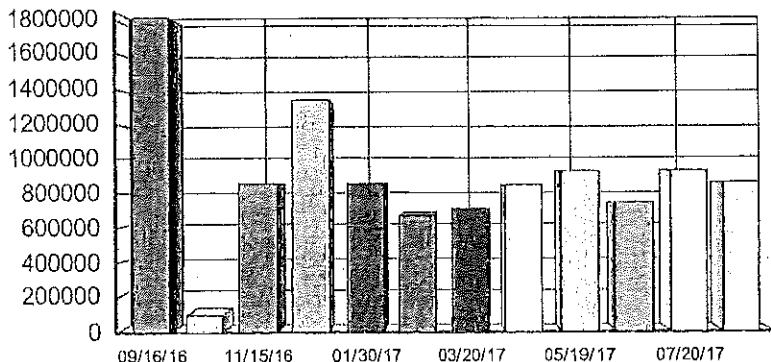
DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WA WATER ST State Tax	1015340	08/29 - 09/15	4280200	4558300	278100	\$982.03 \$95.75

Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm.
Failure to receive bill or late notice does not exempt from paying bill penalty or having
service disconnected. Adjustments must be paid in 30 days. Rates available on request.

Net Due	\$1,077.78
Due Date	10/15/2017
Pay After Due Date	\$1,175.98

Current Billing Period		
Days	Total Usage	Daily Average
17	278100	16358.82



To pay online, please visit
www.CrabOrchardUtility.com
and click "pay online".

BOC Monthly Meeting
2nd Tuesday 5:00 p.m.
at the district office

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RETAIN THIS PORTION FOR YOUR RECORDS

**CRAB ORCHARD
UTILITY DISTRICT**
2089 East First Street
Crossville, TN 38555



Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$1,046.28
Due Date: 11/15/2017
After Due Date Please Pay: \$1,141.61

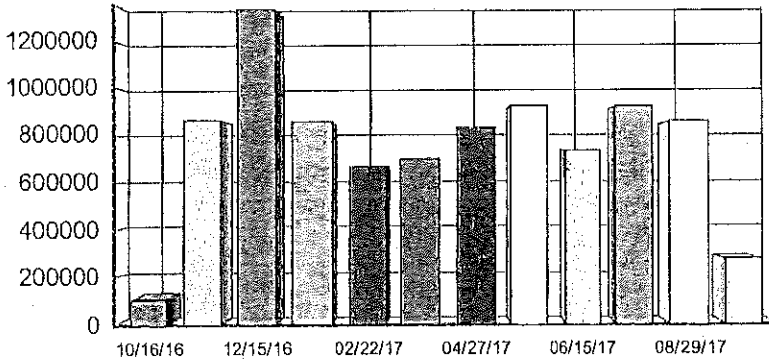
DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WA WATER ST State Tax	1015340	09/15 - 10/18	4558300	4828200	269900	\$953.33 \$92.95

Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm.
Failure to receive bill or late notice does not exempt from paying bill penalty or having service disconnected. Adjustments must be paid in 30 days. Rates available on request.

Net Due	\$1,046.28
Due Date	11/15/2017
Pay After Due Date	\$1,141.61

Current Billing Period		
Days	Total Usage	Daily Average
33	269900	8178.79



To pay online, please visit
www.CrabOrchardUtility.com
and click "pay online".

BOC Monthly Meeting
2nd Tuesday 5:00 p.m.
at the district office

"This institution is an equal opportunity provider and employer."
Visit our website at: www.craborchardutility.com

See back of bill for
2016 Consumer Confidence Report details.

RETAIN THIS PORTION FOR YOUR RECORDS

**CRAB ORCHARD
UTILITY DISTRICT**
2089 East First Street
Crossville, TN 38555



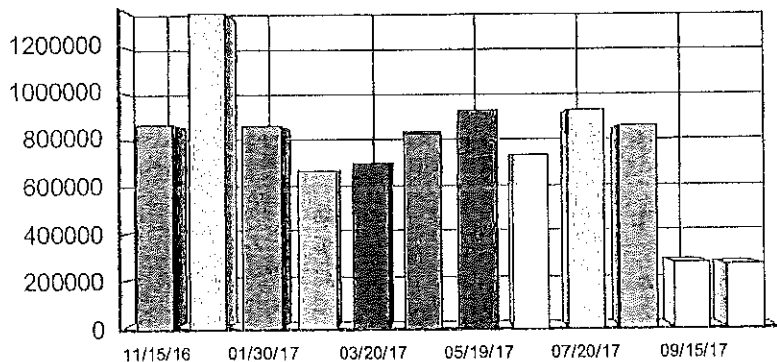
Account #: 0001-00900-001
Account Name: RECEIVERSHIP MANAGEMENT, INC.
Service Address: 284 MULLINAX DR

Amount Due: \$1,380.47
Due Date: 12/15/2017
After Due Date Please Pay: \$1,506.25

DUE UPON RECEIPT - ARREARS DUE IMMEDIATELY

SERVICE DESCRIPTION	METER	READING DATES	PREVIOUS	PRESENT	USAGE	CHARGES
WA WATER ST State Tax	1015340	10/18 - 11/19	14828200	5185100	356900	\$1,257.83 \$122.64
Billing Inquiries - Contact us at (931) 484-6987. Office Hours - 8:00 am to 4:00 pm. Failure to receive bill or late notice does not exempt from paying bill penalty or having service disconnected. Adjustments must be paid in 30 days. Rates available on request.					Net Due	\$1,380.47
					Due Date	12/15/2017
					Pay After Due Date	\$1,506.25

Current Billing Period		
Days	Total Usage	Daily Average
32	356900	11153.13



To pay online, please visit
www.CrabOrchardUtility.com
and click "pay online".

BOC Monthly Meeting
2nd Tuesday 5:00 p.m.
at the district office

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Visit our website at: www.craborchardutility.com

See back of bill for
2016 Consumer Confidence Report details.

RETAIN THIS PORTION FOR YOUR RECORDS

8:55 AM

12/01/17

Laurel Hills Water System In Receivership
A/R Aging Summary
As of November 30, 2017

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BETTIS, MARTHA	0.00	114.24	0.00	0.00	0.00	114.24
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	1,524.36	1,867.08
BRASSELL, CRYSTAL	0.00	114.24	0.00	0.00	0.00	114.24
CHAMBERS, BARRY	0.00	114.24	114.24	0.00	0.00	228.48
CPCA (76)	0.00	2,170.56	2,170.56	1,949.70	34,957.44	41,248.26
DOUGLAS, JIMMY & JACKIE	0.00	114.24	0.00	0.00	0.00	114.24
HARDEMAN, GRETCHEN	0.00	114.24	114.24	0.00	0.00	228.48
JUDD, JONATHAN	0.00	114.24	114.24	0.00	0.00	228.48
LATHAM, KENT	0.00	114.24	114.24	114.24	1,028.16	1,370.88
Laurel Hills Condo Assoc (#5101)	0.00	114.24	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	1,142.40	1,485.12
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	1,142.40	1,485.12
MATERDOMINI, DINA	0.00	114.24	0.00	0.00	0.00	114.24
MCQUEEN, DARRELL E	0.00	114.24	114.24	0.00	0.00	228.48
MILLER, DAVID	0.00	112.16	0.00	0.00	0.00	112.16
MURPHY, JEFF	0.00	114.24	0.00	0.00	0.00	114.24
TOTAL	0.00	3,882.08	3,084.48	2,406.66	39,794.76	49,167.98

EXHIBIT
E

LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

11/30/2017

OPERATING BANK ACCOUNT

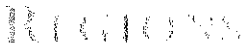
	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	33,238.67	31,785.37
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(1,441.30)	
	<u>31,785.37</u>	<u>31,785.37</u>

18-Dec-17
02:04 PM

OUTSTANDING CHECKS

1150	750.00	
1151	391.30	
1152	300.00	
		<u>1,441.30</u>

EXHIBIT
E



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 2

LIFEGREEN BUSINESS CHECKING
 November 1, 2017 through November 30, 2017

SUMMARY			
Beginning Balance	\$24,019.19	Minimum Balance	\$24,111
Deposits & Credits	\$10,815.72 +	Average Balance	\$28,967
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$1,596.24 -		
Ending Balance	\$33,238.67		

DEPOSITS & CREDITS			
11/01	Deposit - Thank You		342.72
11/09	Deposit - Thank You		1,370.88
11/15	Deposit - Thank You		8,073.96
11/22	Deposit - Thank You		342.72
11/29	Deposit - Thank You		685.44
Total Deposits & Credits			\$10,815.72

CHECKS						
Date	Check No.	Amount	Date	Check No.	Amount	
11/02	1147	249.96	11/16	1149	1,046.28	
11/22	1148	300.00				
					Total Checks	\$1,596.24

* Break In Check Number Sequence

DAILY BALANCE SUMMARY					
Date	Balance	Date	Balance	Date	Balance
11/01	24,361.91	11/15	33,556.79	11/29	33,238.67
11/02	24,111.95	11/16	32,510.51		
11/09	25,482.83	11/22	32,553.23		

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

LHWS Balance Sheet (as of 11/30/2017) - Modified Accrual Basis*

Current Assets

Cash	\$31,785.37	
Receivable - TPUC/RMI/Laurel Hills - RMI/Sinor F&E	\$0.00	
Prepaid Expense - CNA Insurance (2017-18 PY)	<u>\$5,741.14</u>	
Total Current Assets		\$37,526.51

Liabilities

Payable - Lansford & Stephens (November Billing)	\$300.00	
Payable - Gerald Williams (November 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	
Payable - November 2017 F&E RMI & Sinor	\$5,848.15	
Reserve (Survey work on Renegade Mountain)	\$7,500.00	
Reserve (Lansford & Stephens - 2017 Tax Form Prep.)	\$233.33	
Reserve (TDEC Fees)	\$425.00	
Reserve (MicroBac)	\$134.00	
Reserve (Repair)	<u>\$1,000.00</u>	
Total Liabilities		<u>\$28,977.18</u>
Surplus (Deficit)		\$8,549.33

* 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 December 2017

Starting Balance (11/30/2017)		\$31,735.37
Projected Deposits in December 2017	\$11,050.00	
Projected Cash Inflows		<u>\$11,050.00</u>
Current Assets PLUS Projected Cash Inflows		\$42,785.37
Crab Orchard Utility District	\$1,380.47	
Volunteer Electric Cooperative	\$600.00	
Gerald Williams	\$750.00	
Lansford & Stephens	\$300.00	
MicroBac	\$201.00	
Survey Work Payment	<u>\$2,300.00</u>	
Projected Cash Outflows		<u>\$5,531.47</u>
Projected Ending Balance (12/31/2017)		\$37,253.90

* 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)
11/1/17 Through 11/30/17

Date	Account	Num	Description	Memo	Amount
			EXPENSES		
			4010-WATER BILL RECEIPTS		
11/1/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		342.72
11/9/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		1,370.88
11/15/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		8,073.96
11/22/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		342.72
11/29/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		685.44
			TOTAL 4010-WATER BILL RECEIPTS		10,815.72
			5695-FEES ACCOUNTING		
11/7/17	REGIONS LHWD 02326186...	1148	LANSFORD & STEPHENS	OCT 2017	-300.00
11/30/17	REGIONS LHWD 02326186...	1152	LANSFORD & STEPHENS	NOV 2017	-300.00
			TOTAL 5695-FEES ACCOUNTING		-600.00
			5697-OTHER CONTRACT LABOR		
11/10/17	REGIONS LHWD 02326186...	1150	GERALD WILLIAMS	OCT 2017 FEES	-750.00
			TOTAL 5697-OTHER CONTRACT LABOR		-750.00
			6290-UTILITIES		
11/7/17	REGIONS LHWD 02326186...	1149	CRAB ORCHARD UTILITY DISTRICT		-1,046.28
11/29/17	REGIONS LHWD 02326186...	1151	VOLUNTEER ENERGY COOPERATIVE		-391.30
			TOTAL 6290-UTILITIES		-1,437.58
			TOTAL EXPENSES		8,028.14
			OVERALL TOTAL		8,028.14



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

<u>Jeanne Barnes Bryant</u>	
November 2017 Fees	\$253.30
November 2017 Overhead Expense	\$23.80
<u>Receivership Management, Inc.</u>	
November 2017 Fees	\$549.55
November 2017 Overhead Expense	\$87.50
November 2017 Expenses	\$51.85
<u>Everett Sinor</u>	
November 2017 Fees & Expenses	<u>\$4,882.15</u>
Proposed Payment out of Receivership Estate	\$5,848.15
<u>Graham Matherne</u>	
November 2017 Fees & Expenses	<u>\$2,106.00</u>
Proposed Interim Taxation of Costs	\$2,106.00

EXHIBIT
I

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT				November 2017
11/2/2017	Jeanne Barnes Bryant	EMAIL RE INVOICE, REVIEW SAME	0.1	\$163.00 \$16.30
11/7/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS	0.1	\$163.00 \$16.30
11/10/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS	0.1	\$163.00 \$16.30
11/16/2017	Jeanne Barnes Bryant	CALL RE FILING FROM COUNSEL, QUESTIONS RE SAME, QUESTIONS RE LATE FEE	0.3	\$163.00 \$48.90
11/17/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT, REVIEW SAME, QUESTION RE AFFIDAVIT	0.3	\$163.00 \$48.90
11/21/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE NEW REPORT, REVIEW SAME	0.2	\$163.00 \$32.60
11/22/2017	Jeanne Barnes Bryant	EMAILS RE SECOND DISCOVERY ISSUES, EMAIL RE REPORT	0.2	\$163.00 \$32.60
11/27/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE FILING, RESPONSE RE SECOND REQUESTS	0.2	\$163.00 \$32.60
11/29/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL, REVIEW AND SIGN CHECKS	0.2	\$163.00 \$32.60
Total				\$277.10

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **November 2017**

Date	Service Provider	Description	Hours	Amount
11/6/2017	Lauren B. Garcia	POST DEPOSITS AND INVOICE	0.2	\$50.00
11/7/2017	Cody Smith	DISCUSSION WITH E. SINOR RE PROPOSED PRO FORMA FINANCIAL STATEMENTS AND RECEIPTS & DISBURSEMENTS THRU 9/30/17.	0.4	\$123.00
11/7/2017	Jere P. Cowan	PROCESS EXPENSE PAYMENTS; FORWARD PAYMENTS	0.5	\$50.00
11/8/2017	Lauren B. Garcia	PRINT MONTHLY BANK STATEMENT FOR RECONCILIATION	0.1	\$50.00
11/10/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENT; FORWARD SAME	0.4	\$50.00
11/10/2017	Robert E. Moore, Jr.	REVIEW AND APPROVE LATE FILED EXHIBITS, UPDATE DISCUSSION WITH E.SINOR RE: SAME.3	0.3	\$153.00
11/13/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.2	\$123.00
11/13/2017	Lauren B. Garcia	POST FEES/EXPENSES FOR OCTOBER	0.2	\$50.00
11/13/2017	Lauren B. Garcia	RECONCILE BANK ACCOUNT THRU OCTOBER 2017	0.2	\$50.00
11/14/2017	Robert E. Moore, Jr.	REVIEW UPDATED TARIFF DRAFT FROM E.SINOR.2; REVIEW ANSWER TO DISCOVERY FROM MOY TOY AND RESPOND TO E.SINOR.10	0.3	\$153.00
11/15/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 10-31-17. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 10-31-17.	0.5	\$123.00
11/15/2017	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: DISCOVERY ISSUES AND CCN.3	0.3	\$153.00

LAUREL HILLS WATER DISTRICT **November 2017**

Date	Name	Description	Amount	Total
11/17/2017	Cody Smith	PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 10-31-17. REVIEW CASH RECEIPTS & DISBURSEMENTS. DISCUSSION WITH E.SINOR RE FINANCIAL STATEMENTS.	\$123.00	\$147.60
11/20/2017	Jere P. Cowan	CONFERENCE WITH C SMITH RE: FINANCIALS; PREPARE AND FORWARD SAME; CONFERENCE WITH L. GARCIA RE: SAME	\$50.00	\$15.00
11/20/2017	Lauren B. Garcia	RESEARCH FINANCIAL EXPENSES, POST DEPOSIT, POST INVOICE	\$50.00	\$15.00
11/22/2017	Robert E. Moore, Jr.	REVIEW ACTIVITY REPORT, FINANCIAL UPDATES, RESPOND TO QUESTIONS FROM C.SMITH ON SURVEY WORK INVOICE.25	\$153.00	\$38.25
11/27/2017	Jere P. Cowan	FINALIZE R. MOORE AFFIDAVIT; EMAIL E. SINOR; FORWARD SAME	\$50.00	\$10.00
11/28/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	\$123.00	\$12.30
11/28/2017	Robert E. Moore, Jr.	COMMENTS ON DISCOVERY FROM RMMC TO E.SINOR .10	\$153.00	\$15.30
11/29/2017	Robert E. Moore, Jr.	REVIEW AND APPROVE DRAFT RESPONSE TO RMCC DISCOVERY .10; ADVISE TO PREPARE A TARIFF FOR USE IN CCN APPLICATION .10	\$153.00	\$30.60

Total **\$637.05**

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

December 1, 2017

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

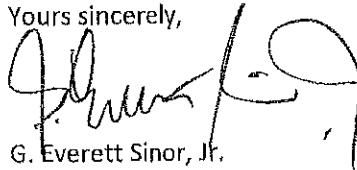
RE: *November 2017 Billings – RMI/Laurel Hills Water System in Receivership*

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>
11/1/2017	Work on modified receivership plan	0.6		
11/2/2017	Review Lansford & Stephens deposit information; review L&S bill; email to Heather @ L&S requesting A/R information; T.C. w G Williams & email to R Moore & G Matherne re same; T.C. to A Conklin	0.5		
11/3/2017	Review A/R schedule as of 10/31; draft of pro forma financials for CCN petition; email to M Hargis re insurance	1.0		
11/6/2017	M Hargis email re insurance & response from R Moore; G Matherne email on modified receivership plan; continue drafting modified receivership plan; email to G Matherne & R Moore re CCN petition; T.C. w C Turner @ Cumberland County C&M office; review G Matherne email; T.C. w R Kreis, owner of property on Renegade Mountain; emails t Heather w L&S, R Moore & G Matherne re Kreis call	1.4		
11/7/2017	Email from A Conklin re 20th report; T.C. (2) w C Smith re financials; review of order of discovery deadline in show cause/motion to enforce matter; T.C. w Heather @ L&S re Mr. Kreis bill; T.C. w T Stephens @ L&S	0.3		
11/8/2017	V.M. from Heather @ L&S re Mr. Kreis; T.C. to Mr. Kreis re his bill; email to Heather re same; review of G Matherne invoice	0.2		
11/9/2017	T.C. (2) w R Moore re LHWS matters	0.1		
11/10/2017	Review G Matherne email on CCN petition; Email to the TPUC re modified receivership plan; T.C. w G Matherne re LHWS matters; preparation of late filed exhibits for CCN petition; T.C. w R Moore re LHWS matters; review of A Conklin settlement letter; preparation of docs for CCN petition matter; T.C. w G Matherne; email to R Moore & G Matherne re CCN petition matter docs	3.8		
11/12/2017	Review R Moore email on CCN petition docs; Review G Matherne email on CCN petition docs; email to R Moore & G Matherne re same	0.1		
11/13/2017	1st Recovery Request; T.C. w C Smith re tariff items; finish 1st recovery request; filing; emial to D Moore w discovery	3.9		
11/14/2017	Prep of tariff; T.C. w R Moore re tariff & other LHWS matters; tariff to R Moore in email	0.7		

11/15/2017	Review insurance email from M Hargis @ AJG; response draft to RMCC; email to Heather re discovery request	1.6		
11/16/2017	T.C. w C Smith; draft of discovery responses; first modified plan modifications; T.C. w G Matherne, R Moore, A Conklin (2); A Levondosky, Chancellor Thurman's sec'y about motion date; D Moore, Heather w L&S (2); and J Bryant re LHWS matters; V.M. for D Kendall re receivership plan; review A Conklin email; T.C. w G Williams; further work on tariff filing; review RMCC discovery responses; Review deposit information from Heather @ L&S	5.1		
11/17/2017	draft of 21st report; T.C. w C Smith (2) re 21st report & financials; email to A Levondosky, Chancellor's secy re motion dates; email from J Bryant re 21st report; email to G Matherne & response re same; email to J Bryant	2.9		
11/20/2017	Work on 20th report & email to R Moore re 21st report	0.3		
11/21/2017	call to A Levondosky w Chancellor Thurman's office re hearing date; work on first modified receivership plan; email to R Moore re 21st report; email from Heather w Lansford & Stephens re outstanding LHWS items & response; T.C. w G Matherne re discovery; preparation of 2nd discovery request	3.0		
11/24/2017	Review A Conklin email on conf. call; response & email to J Gass; email from R Moore re 2d discovery & response	0.1		
11/27/2017	20th report finalization; email from Heather w L&S re modified A/R schedule; email from J Moore re COUD meeting & response; modification of 21st report; email to K Cashman-Grams of 21st report; T.C. w C Smith re RMI EXP schedule; T.C. w J Gass secretary re conference call;	2.3		
11/28/2017	prep of 2nd discovery response; email to D Moore re same; transmit draft of response to G Matherne & R Moore for review; T.C. w A Conklin re conference call hosting; T.C. w D Whitaker re same; email from R Moore re 2d discovery response; review of emails to/from TPUC	1.4		
11/29/2017	Review R Moore email on discovery; T.C. (2) to A Conklin; work on discovery response; T.C. (2) w G Matherne; draft cover letter to TPUC & D Moore email; review discovery response from RMCC; review of L&S bill and deposits; submit discovery	2.8		
11/30/2017	21st report affidavit from R Moore; T.C. (2) w A Conklin re status conference times and dates; motion notice for S/J from Moy Toy; T.C. w A Levondosky re conf call; email to D Whitaker re conf call; email & letter from C Turner w Cumberland County C&M w letter	0.7		
	Hourly Billing Total	32.8	\$140.00	\$4,592.00

	<u>Miles</u>	<u>Rate</u>	
Mileage Total	0.0	\$0.47	\$0.00
10/23/2017 Parking for TPUC October Hearing	\$12.00		
11/13/2017 Postage for first discovery to RMCC	\$43.81		
11/16/2017 Postage for tariff filing with TPUC	\$25.36		
11/16/2017 Postage for first discovery response to RMCC	\$35.01		
11/21/2017 Postage for second discovery to RMCC	\$16.00		
11/27/2017 Postage for 20th Report	\$36.68		
11/21/2017 Postage for Filing of First Modified Receivership Plan	\$81.41		
11/29/2017 Postage for second discovery response to RMCC	\$39.88		
Other Expenses Reimburseable Total			<u>\$290.15</u>
Balance Owed this month			\$4,882.15
Previous Balance Owed		\$7,575.69	
Total Amount Due and Payable			\$12,457.84

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

11/21/17 04:18 PM

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



001	008237 (022)	TO \$	6.72
	First Class Package		
	Tracking# MMWJNUUNEFZ86		
002	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0307682972		

SubTotal \$ 16.00
Total \$ 16.00

MASTERCARD \$ 16.00

ACCOUNT NUMBER * *****3631
Appr Code: 07500Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: 38AAA4839CFFD3C9
ARC: 00

Receipt ID 83997749279969888314 002 Items
CSH: Diane Tran: 3383 Reg: 001

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Dusty Tr-20

RECEIPT

Tulane Lot

Operator: Premier Parking
NON-TRANSFERABLE

License Plate Number

2D4

Expiration Date/Time

02:43 PM

OCT 23, 2017

Purchase Date/Time: 12:43pm Oct 23, 2017

Total Due: \$12.00

Rate: \$12 for 2 Hours

Total Paid: \$12.00

Payment Type: Card

Ticket #: 10071902

S/N #: 500013040187

Setting: 714-Church

Mach Name: 714-Church

PVC hearing parking

*****3631, MasterCard

Auth #: 00483Z

Thank you! Please retain
this receipt for
your proof of purchase.
* NO IN & OUT ALLOWED *

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

11/21/17 11:45 AM

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001	001040 (001)	TO \$	12.37
	Ground Commercial		
	Tracking# 1Z303Y3Y0307858334		
002	001045 (001)	TO \$	10.28
	Ground Residential		
	Tracking# 1Z303Y3Y9074325574		
003	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0307859495		
004	000008 (022)	TO \$	12.98
	Priority Mail		
	Tracking# 9405510200883631422580		
005	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0307660072		
006	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0374327315		
007	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0307661231		

SubTotal \$ 81.41
Total \$ 81.41

MASTERCARD \$ 81.41

ACCOUNT NUMBER * *****3631
Appr Code: 06598Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: 60E8127A0DCDC339
ARC: 00

Receipt ID 83997749279949888628 007 Items
CSH: TONYA

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

11/29/17 05:28 PM

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001	001040 (001)	TO \$	9.77
	Ground Commercial		
	Tracking# 1Z303Y3Y0307852632		
002	001040 (001)	TO \$	9.71
	Ground Commercial		
	Tracking# 1Z303Y3Y0374520454		
003	008237 (022)	TO \$	20.40
	First Class Package		
	Tracking# MMWJNUUPHGTW		

SubTotal \$ 39.88
Total \$ 39.88

MASTERCARD \$ 39.88

ACCOUNT NUMBER * *****3631
Appr Code: 08121Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: AFCCEF2E9C7185F0
ARC: 00

Receipt ID 83997749999790888082 003 Items
CSH: JENA Tran: 3534 Reg: 001

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11/16/17 01:08 PM

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001	008237 (022)	TO \$	16.08
	First Class Package		
	Tracking# MMWJNUUTF8G4D		
002	001040 (001)	TO \$	9.60
	Ground Commercial		
	Tracking# 1Z303Y3Y0374338010		
003	500418 (002)	T1 \$	2.59
	12x15 Bub Mailer #4		
004	500005 (025)	T1 \$	5.94
	Manilla Med 12X9	QTY 6	
	Reg Unit Price	\$	0.99
	SubTotal	\$	34.21
	State and County Tax (T1)	\$	0.80
	Total	\$	35.01

MASTERCARD \$ 35.01

ACCOUNT NUMBER * *****3631
Appr Code: 07983Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: F56F67BC563488E5
ARC: 00

Receipt ID 82997749281609888913 009 Items
CSH: Diane Tran: 6843 Reg: 002

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LWS

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

11/27/17 05:10 PM

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001	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJ8MCKP5		
002	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJHGING		
003	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJZ0BA27		
004	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJUPV9DZ1		
005	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJ98ZSX		
006	008237 (022)	TO \$	4.0
	First Class Package		
	Tracking# MMWJNUJ9EJH		
007	001040 (001)	TO \$	12.20
	Ground Commercial		
	Tracking# 1Z303Y3Y0374443896		

SubTotal \$ 36.68
Total \$ 36.68

MASTERCARD \$ 36.68

ACCOUNT NUMBER * *****3631
Appr Code: 03025Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: B3F1D72BD8A27A2F
ARC: 00

Receipt ID 83997749939077888945 007 Items
CSH: JEMA

Brentwood, TN 37027
(615) 377-8100

11/13/17 05:04 PM

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

11/16/17 04:39 PM

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001	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUUPHRGZY		
002	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUJ3QH47K		
003	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUUPNQA9S		
004	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUUWKQ055		
005	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUJ2N59PD		
006	008237 (022)	TO \$	1.12
	First Class Package		
	Tracking# MMWJNUUSDGACG		
007	008237 (022)	TO \$	3.03
	First Class Package		
	Tracking# MMWJNUJ9DYA24		
008	008237 (022)	TO \$	3.03
	First Class Package		
	Tracking# MMWJNUJF5H9AQ		
009	008237 (022)	TO \$	3.03
	First Class Package		
	Tracking# MMWJNUJMFUUC5		
010	008237 (022)	TO \$	3.03
	First Class Package		
	Tracking# MMWJNUURHA4QG		
011	008237 (022)	TO \$	3.03
	First Class Package		
	Tracking# MMWJNUJTMXA2		
012	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0307616576		
013	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0374283818		
014	008237 (022)	TO \$	3.38
	First Class Package		
	Tracking# MMWJNUJSMOHVH		

SubTotal \$ 43.81
Total \$ 43.81

MASTERCARD \$ 43.81

ACCOUNT NUMBER * *****3631
Appr Code: 05382Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000

LMJES
Ed D...



001	008237 (022)	TO \$	16.08
	First Class Package		
	Tracking# MMWJNUJ3CJ4ZQ		
002	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0374339491		

SubTotal \$ 25.36
Total \$ 25.36

MASTERCARD \$ 25.36

ACCOUNT NUMBER * *****3631
Appr Code: 07736Z (I) Sale

ENTRY METHOD: ChipRead
MODE: Issuer
AID: A0000000041010
TVR: 0000008000
TSI: E800
AC: E39AA1CD231E6BAA
ARC: 00

Receipt ID 82997749281679888211 002 Items
CSH: Diane Tran: 6853 Reg: 002

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Janet Ailey

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

DECEMBER 6, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1048665

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 NOVEMBER 30, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$2,106.00
TOTAL THIS INVOICE	\$2,106.00
PREVIOUSLY BILLED AND OUTSTANDING	\$20,736.00
TOTAL AMOUNT DUE	\$22,842.00

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

DECEMBER 6, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1048665

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 NOVEMBER 30, 2017

11/06/17	FURTHER REVISIONS TO 1ST MODIFIED RECEIVERSHIP PLAN (.50); E-MAILS WITH SINOR AND MOORE REGARDING SAME; (.20); REVIEW FINAL PACKET REGARDING MODIFIED RECEIVERSHIP PLAN AND E-MAILS TO SINOR REGARDING SAME (.60); E-MAILS WITH SINOR AND MOORE REGARDING EAGLE'S NEST (.10).	J. GRAHAM MATHERNE	1.40 hours at 270.00 per hour.	378.00
11/09/17	WORK ON AMENDED PETITION (.90); REVIEW COUNSEL E-MAILS REGARDING CCN FILING (.10).	J. GRAHAM MATHERNE	1.00 hours at 270.00 per hour.	270.00
11/10/17	DRAFTING DISCOVERY UPON RMCC IN CONTEXT OF DISCOVERY IN CCN PROCEEDINGS (.70); TELEPHONE CONFERENCES AND E-MAILS WITH SINOR REGARDING SAME (.20).	J. GRAHAM MATHERNE	.90 hours at 270.00 per hour.	243.00
11/12/17	REVIEW OF WRITTEN DISCOVERY SET FROM SINOR REGARDING RMCC (.60); E-MAIL TO SINOR REGARDING SUGGESTED EDITS/ADDITIONS (.10).	J. GRAHAM MATHERNE	.70 hours at 270.00 per hour.	189.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1048665

11/13/17 REVIEW RMCC DISCOVERY REQUESTS UPON RECEIVER
(.40).
J. GRAHAM MATHERNE .40 hours at 270.00 per hour. 108.00

11/15/17 E-MAILS WITH E. SINOR AND WITH R. MOORE
REGARDING RESPONSES TO RMCC DISCOVERY.
J. GRAHAM MATHERNE .30 hours at 270.00 per hour. 81.00

11/16/17 REVIEW OF RMCC RESPONSES TO RECEIVER DISCOVERY
(.40)
J. GRAHAM MATHERNE .40 hours at 270.00 per hour. 108.00

11/21/17 E-MAILS WITH E. SINOR REGARDING 2ND ROUND OF
DISCOVERY IN CCN PROCEEDINGS AND WITH SINOR
REGARDING SAME (.30); REVIEW AND REVISE SECOND
SET OF DISCOVERY REQUESTS (.40); REVIEW E-MAILS
BETWEEN SINOR AND MOORE REGARDING SAME (.10).
J. GRAHAM MATHERNE .80 hours at 270.00 per hour. 216.00

11/28/17 REVIEW MATERIALS REGARDING RESPONSE TO RMCC'S
2ND REQUEST FOR DISCOVERY IN CCN PROCEEDING
(.50); E-MAILS WITH SINOR AND MOORE REGARDING
SAME (.40).
J. GRAHAM MATHERNE .90 hours at 270.00 per hour. 243.00

11/29/17 TELEPHONE CONFERENCES WITH E. SINOR REGARDING
RESPONSE TO RMCC DISCOVERY (.40); REVIEW OF
RESPONSES FROM RMCC TO RECEIVER DISCOVERY
(.20); OUTLINING ISSUE REGARDING CCN
APPLICATION (.40).
J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour. 270.00

TOTAL SERVICES 7.80 \$2,106.00

TOTAL THIS INVOICE \$2,106.00

PREVIOUSLY BILLED AND OUTSTANDING \$20,736.00

TOTAL AMOUNT DUE \$22,842.00

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1048665

Dec 6, 2017
PAGE 4

-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEE'S
J MATHERNE PARTNER	270.00	7.80	2106.00

RMI EXP RECOVERABLE. LHWD
11/1/17 Through 11/30/17

Category Description	11/1/17- 11/30/17	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-253.30	-253.30
5610-CONTRACT LABOR RMI	-549.55	-549.55
5690-RMI OH EXPENSE	-111.30	-111.30
TOTAL 5100 FEES RMI	-914.15	-914.15
5150 FEES LEGAL		
5400-LEGAL FEES	-6,988.15	-6,988.15
TOTAL 5150 FEES LEGAL	-6,988.15	-6,988.15
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-13.40	-13.40
6210-POSTAGE	-2.99	-2.99
TOTAL 5300 EXPENSES	-51.85	-51.85
OVERALL TOTAL	-7,954.15	-7,954.15

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
J

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 November 1, 2017 through November 30, 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.

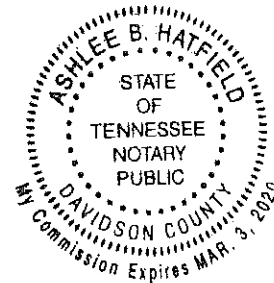

KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

9th day of January, 2018.


NOTARY PUBLIC

My commission expires: 3/3/2020



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

2. I am the 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
K

expenses incurred for the period of time between November 1, 2017 and November 30, 2017 that are contained in the Receiver's motion.

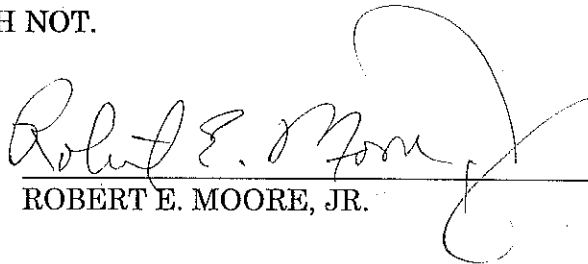
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

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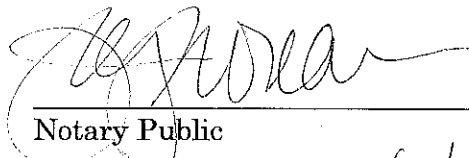
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the 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 \$5848.15 (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 \$2106.00 (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

4th day of January, 2018.


Notary Public
Commission Expires: 1/6/2020

