

G. EVERETT SINOR, JR.  
Attorney at Law

November 27, 2017

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

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

VIA UNITED STATES FIRST CLASS MAILS

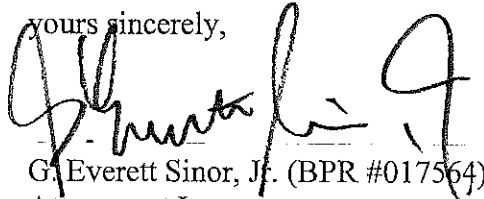
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Twentieth 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

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

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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

FILED  
Date 11-28, 2017 at 11:05 AM  
Entered: \_\_\_\_\_  
SUE TOLLEY, CLERK & MASTER  
Cumberland County, Tennessee, TN  
BY: \_\_\_\_\_ *AT*

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**RECEIVER'S TWENTIETH REPORT AND MOTION FOR APPROVAL OF FEES AND  
EXPENSES, AUTHORIZATION FOR PAYMENT OF CERTAIN FEES AND EXPENSES,  
AND FOR AN INTERIM TAXATION OF COSTS**

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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 Twentieth 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.<sup>1</sup>

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.<sup>2</sup>

#### Implementation 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 Receivership Plan. As previously reported, the Receiver's preferred bidder, Aqua Green Utility, Inc. has noted numerous issues relative to the LHWS which would impact its decision to move forward and acquire the LHWS.

4. 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.

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<sup>1</sup> 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.

<sup>2</sup> *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, and October 10, 2017, respectively.

5. Since the failed February 21, 2017 global mediation session concluded, the Receiver has pursued its condemnation action in Cumberland County Circuit Court, though it is still early in that process and initial discovery has not yet commenced. Defendants in that condemnation action have filed a Motion to Dismiss, and that motion has not yet been heard.

**Operations and Other Activities of the Receiver**

6. In September of 2017, 94 of the 131 customers of the LHWS timely paid their water bill. Of the 37 non-paying customers, 24 are in the Cumberland Pointe condominium units, and 13 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. However, in October of 2017, one of the Laurel Hills Condominium units completely paid up all past due balances since institution of the LHWS's \$114.28 rate, and so additional income from that unit is expected to be reported when October, 2017 results are provided to the Court.

7. As previously reported, Mr. Williams repaired a significant leak in one of the main service lines. After repairing this leak, Mr. Williams estimated that the repair of that leak would cut the water use of the LHWS down by approximately 2/3, so that daily use has been reduced from approximately 27,000 gallons down to approximately 10,000 gallons.

The October 2017 wholesale water bill is significantly lower, with a bill just slightly over \$1000.00.<sup>3</sup> The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

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<sup>3</sup> For this reason, the Receiver's future projected income statement for the future has been revised to reflect an estimate of \$1500.00 per month for the LHWS's wholesale water bill. See Exhibit C.

8. Grading work referenced in the Receiver's previous reports was completed on October 13, 2017. Mr. Williams inspected the work and recommended payment to the LHWS's vendor.

9. As previously reported, on September 12, 2017, 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.<sup>4</sup> Both Renegade Mountain Community Club and the Consumer Advocate and Protection division of the Tennessee Attorney General and Reporter's office have filed petitions to intervene in that matter.<sup>5</sup> The matter has not yet been scheduled for hearing by the Commission.

10. As previously reported, at its docket call on August 16, 2017, this Honorable Court ordered the parties to appear at a status conference respecting the Commission's Motion for an Order to Show Cause and the Laurel Hills Condominiums POA's Motion to Enforce the Settlement Agreement for hearing. The status conference is set for October 23, 2017 in Crossville, Tennessee, but an Agreed Order has been submitted to continue the status conference until December 20, 2017 for this Honorable Court's consideration.

#### Current Financial Information

11. As of September 30, 2017, there was an accounts receivable past due balance of \$45,471.38.<sup>6</sup> A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

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<sup>4</sup> *Petition for Grant of Provisional Certificate of Public Necessity and Convenience*, Docket No. 17-00098, filed with the Tennessee Public Utility Commission.

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

<sup>6</sup> Of this amount, \$4303.28 is less than a month past due, and \$41,168.10 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.

12. As of September 30, 2017, the LHWS had a cash balance of \$24,154.05 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 September of 2017.<sup>7</sup>

**Current Modified Accrual Basis Financial Documents & Current Estimated Surplus**

13. As previously reported, even laying aside Mr. Matherne's current and projected fees and expenses, the LHWS still faces potential financial deficits. In its projection, the Receiver attributes the problem to the fact that less customers are paying their bill than was initially projected when the current rate was proposed. This is compounded by the fact that one of the Cumberland Pointe condominium buildings burnt to the ground in early September, 2017, resulting in the loss of eight (8) customers, three (3) of which were regularly paying their water bill. However, significant savings on the LHWS's wholesale water bill are expected to be realized due to the leak that was repaired last month, and which was reported to this Honorable Court in the Receiver's Nineteenth Report.<sup>8</sup> Thus the Receiver now estimates that the LHWS will break even in any given month.<sup>9</sup>

14. The Receiver has generated a number of internal, unaudited financial documents prepared on a modified accrual basis, which are attached hereto as Collective Exhibit C and which are incorporated herein by reference. Those documents are (1) an

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<sup>7</sup> 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.

<sup>8</sup> See also ¶ 7, supra.

<sup>9</sup> This 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.

estimated monthly budget or monthly income statement; (2) a balance sheet as of September 30, 2017; and (3) a cash flow statement showing projected cash flows for the month of October, 2017. Actual cash receipts and disbursements for September of 2017 for the LHWS are contained in a spreadsheet that is attached hereto as Exhibit D and is incorporated herein by reference.

15. The Receiver now estimates that the LHWS will, on average, break even each month.<sup>10</sup> 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 an \$9431.80 surplus as of September 30, 2017. The projected cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of October, 2017.

#### **Fees and Expenses of Receiver**

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

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<sup>10</sup> Id. See Collective Exhibit C.

<sup>11</sup> Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

17. As shown in Collective Exhibit E, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, Chief Operations Officer of the Receiver, and other persons at the Receiver's office, including Mr. Cody Smith, Ms. Anna Hunter, Ms. Lauren Garcia, Ms. Jeanne Bryant, and Ms. Jere Cowan, performed work for this Receivership estate for the period of September 1, 2017 through September 30, 2017 in the amount of \$2933.13.<sup>12</sup> 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 September 1, 2017 through September 30, 2017 in the amount of \$3974.38. 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 September 1, 2017 through September 30, 2017 in the amount of \$8289.00.

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

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

- a. for Mr. Moore & others at the Receiver for September of 2017: \$2933.13;
- b. for Mr. Sinor working under Mr. Moore for September of 2017: \$3974.38; and,
- c. for Mr. Matherne working under Mr. Moore for September of 2017: \$8289.00.

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<sup>12</sup> This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of September 1, 2017 through September 30, 2017, which total \$513.60.



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

*[intentionally blank]*

Motion for Approval of Fees and Expenses and Authorization for Payment

Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the fees and expenses as set forth herein in the aggregate amount of \$15,196.51, 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 \$6907.51 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Commission on an interim basis in the amount of \$8289.00 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: November 27, 2017.

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 G. Everett Sinor, Jr.  
by permission  
granted on 10/24/17

Certificate of Service

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

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

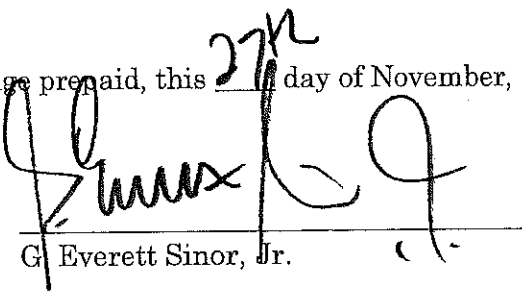
James L. Gass, Esq.  
Ogle, Gass & Richardson  
Counsel for Laurel Hills Condominiums  
Property Owners Association  
103 Bruce Street  
Sevierville, Tennessee 37862

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

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

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

via the United States Mails, postage prepaid, this <sup>27<sup>th</sup></sup> day of November, 2017.

  
G. Everett Sinor, Jr.

4:47 PM  
10/09/17

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

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BACKUS, ELAINE & BRENDA (Running Deer)	0.00	114.24	0.00	0.00	0.00	114.24
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	1,295.88	1,638.60
CECCHETT, DON & DIANNE	0.00	114.24	0.00	0.00	0.00	114.24
CPCA (84)	0.00	2,741.76	2,741.76	2,741.76	29,473.92	37,699.20
HAISER, GARY & JEANNIE	0.00	114.24	0.00	0.00	0.00	114.24
JUDD, JONATHAN	0.00	114.24	114.24	2.46	0.00	230.94
KREIS, RICHARD	0.00	76.40	0.00	0.00	0.00	76.40
LATHAM, KENT	0.00	114.24	114.24	114.24	799.68	1,142.40
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	114.24	913.92	1,256.64
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	913.92	1,256.64
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	913.92	1,256.64
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	114.24	0.00	0.00	0.00	114.24
MURPHY, JEFF	0.00	114.24	0.00	0.00	0.00	114.24
<b>TOTAL</b>	<b>0.00</b>	<b>4,303.28</b>	<b>3,541.44</b>	<b>3,315.42</b>	<b>34,311.24</b>	<b>45,471.38</b>

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Date 11-28, 2017 at 11:03 AM  
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SUE TOLENT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: \_\_\_\_\_ JP

EXHIBIT  
A

LAUREL HILLS WATER DISTRICT  
REGIONS BANK ACCOUNT 232618611

9/30/2017

OPERATING BANK ACCOUNT

	BALANCE PER BANK STMT	BALANCE PER GENERAL LEDGER
END OF MONTH AC 232618611	25,614.05	24,154.05
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(1,448.00)	
	<u>24,154.05</u>	<u>24,154.05</u>

10-Oct-17  
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OUTSTANDING CHECKS

1137	1,148.00
1141	300.00

1,448.00

FILED  
Date 11-28, 2017 at 11:05 <sup>(AM)</sup>PM  
Entered by \_\_\_\_\_  
SUF YOUNG, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: AF

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 2

**LIFEGREEN BUSINESS CHECKING**  
 September 1, 2017 through September 29, 2017

SUMMARY			
Beginning Balance	\$21,160.30	Minimum Balance	\$20,718
Deposits & Credits	\$16,688.44 +	Average Balance	\$25,128
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$12,234.69 -		
<b>Ending Balance</b>	<b>\$25,614.05</b>		

DEPOSITS & CREDITS		
09/06	Deposit - Thank You	6,291.84
09/07	Deposit - Thank You	228.48
09/18	Deposit - Thank You	2,627.52
09/22	Deposit - Thank You	7,540.60
<b>Total Deposits &amp; Credits</b>		<b>\$16,688.44</b>

CHECKS					
Date	Check No.	Amount	Date	Check No.	Amount
09/06	1129	750.00	09/29	1135	2,500.00
09/01	1130	441.41	09/29	1136	10.00
09/13	1131	3,273.05	09/25	1138	2,695.51
09/15	1132	400.00	09/25	1139	201.00
09/18	1133	25.00	09/28	1140	444.19
09/15	1134	1,494.53			
<b>Total Checks</b>					<b>\$12,234.69</b>

\* Break In Check Number Sequence.

DAILY BALANCE SUMMARY					
Date	Balance	Date	Balance	Date	Balance
09/01	20,718.89	09/15	21,321.63	09/28	28,124.05
09/06	26,260.73	09/18	23,924.15	09/29	25,614.05
09/07	26,489.21	09/22	31,464.75		
09/13	23,216.16	09/25	28,568.24		

## Estimated Monthly Income Statement - LHWS\*

### Income

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

### 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>	
<b>Average Expenses</b>		<b>\$10,923.00</b>
<b>Projected Monthly Income (Deficit)</b>		<b>\$127.00</b>

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

FILED  
Date 11-28, 2017 at 11:09 AM  
Entered: \_\_\_\_\_  
SUE TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: \_\_\_\_\_

EXHIBIT  
C

## LHWS Balance Sheet (as of 9/30/2017) - Modified Accrual Basis\*

### Current Assets

Cash	\$24,154.05	
Receivable - TPUC/RMI/Laurel Hills - RMI/Sinor F&E	\$0.00	
Prepaid Expense - CNA Insurance (2017-18 PY)	<u>\$8,037.33</u>	
<b>Total Current Assets</b>		<b>\$32,191.38</b>

### Liabilities

Payable - Lansford & Stephens (September Billing)	\$300.00	
Payable - Gerald Williams (September Billing)	\$750.00	
Payable - Volunteer Electric Service	\$600.00	
Payable - July 2017 F&E RMI & Sinor	\$2,970.50	
Payable - August 2017 F&E RMI & Sinor	\$4,289.91	
Payable - September 2017 F&E RMI & Sinor (estimate)	\$6,907.51	
Payable - Asphalt Paving (estimate on grading work)	\$3,900.00	
Reserve (Survey work on Renegade Mountain--last 1/2 of p'mnt)	\$2,500.00	
Reserve (Lansford & Stephens - 2017 Tax Form Prep.)	\$166.66	
Reserve (TDEC Fees)	\$375.00	
Reserve (MicroBac)	\$0.00	
Reserve (Repair)	<u>\$0.00</u>	
<b>Total Liabilities</b>		<b><u>\$22,759.58</u></b>
<b>Surplus (Deficit)</b>		<b>\$9,431.80</b>

\* 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 October 2017

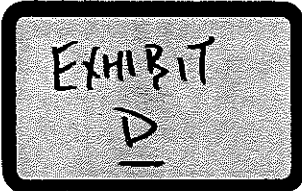
<b>Starting Balance (9/30/2017)</b>		<b>\$24,154.05</b>
Projected Deposits in October 2017	\$11,050.00	
Projected Cash Inflows		<u>\$11,050.00</u>
Current Assets PLUS Projected Cash Inflows		\$35,204.05
Crab Orchard Utility District	\$1,077.78	
Volunteer Electric Cooperative	\$600.00	
Gerald Williams	\$750.00	
Lansford & Stephens	\$300.00	
Asphalt Grading	\$3,900.00	
Survey Work Balance	\$2,500.00	
July & August 2017 RMI & Sinor Fees & Expenses	<u>\$7,260.41</u>	
Projected Cash Outflows		<u>\$16,388.19</u>
<b>Projected Ending Balance (10/31/2017)</b>		<b>\$18,815.86</b>

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

LHWD CASH RECEIPTS (DISBURSEMENTS)  
9/1/17 Through 9/30/17

Date	Account	Num	Description	Memo	Amount
9/6/17	REGIONS LHWD 02326186...	DEP	INCOME 4000 DEPOSIT TOTAL 4000	CNA REFUND	6,291.84 6,291.84
9/18/17	REGIONS LHWD 02326186...	1136	TOTAL INCOME	TAX RECEIPT 47939	6,291.84
9/19/17	REGIONS LHWD 02326186...	1138	EXPENSES Uncategorized CUMBERLAND COUNTY TRUSTEE TOTAL Uncategorized		-10.00 -10.00
9/19/17	REGIONS LHWD 02326186...	1138	2185-OUTSIDE CONTRACTORS 201706 S RECEIVERSHIP MANAGEMENT INC TOTAL 201706 TOTAL 2185-OUTSIDE CONTRACTORS	JUNE EXP	-2,695.51 -2,695.51 -2,695.51
9/7/17	REGIONS LHWD 02326186...	DEP	4010-WATER BILL RECEIPTS DEPOSIT		228.48
9/18/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		2,627.52
9/22/17	REGIONS LHWD 02326186...	DEP	DEPOSIT		7,540.60
9/11/17	REGIONS LHWD 02326186...	1132	TOTAL 4010-WATER BILL RECEIPTS	2016 TAX RETURN AUGUST 2017	10,396.60
9/27/17	REGIONS LHWD 02326186...	1141	5695-FEES ACCOUNTING S LANSFORD & STEPHENS S LANSFORD & STEPHENS TOTAL 5695-FEES ACCOUNTING		-400.00 -300.00 -700.00
9/12/17	REGIONS LHWD 02326186...	1134	5697-OTHER CONTRACT LABOR S GERALD WILLIAMS	INV. 436 INV 434	-744.53 -750.00
9/12/17	REGIONS LHWD 02326186...	1135	S JAKE STATION, PLS TOTAL 5697-OTHER CONTRACT LABOR	SURVEY DEPOSIT	-2,500.00 -3,994.53
9/12/17	REGIONS LHWD 02326186...	1133	6230-OFFICE SUPPLIES TENNESSEE PUBLIC UTILITY COMMISSION TOTAL 6230-OFFICE SUPPLIES		-25.00 -25.00
9/17	REGIONS LHWD 02326186...	1131	6290-UTILITIES CRAB ORCHARD UTILITY DISTRICT	ACCT. NO. RL061	-3,273.05
9/17	REGIONS LHWD 02326186...	1139	MICROBAC		-201.00
9/17	REGIONS LHWD 02326186...	1140	VOLUNTEER ENERGY COOPERATIVE TOTAL 6290-UTILITIES		-444.19 -3,918.24
			6340-INSURANCE EXPENSE		

Date: 11-28, 2017 FILED  
 Entered: SUE TOLLETT, CLERK & MASTER  
 Cumberland County, Crossville, TN  
 BY: [Signature]



10/10/17

LHWD CASH RECEIPTS (DISBURSEMENTS)  
9/1/17 Through 9/30/17

Date	Account	Num	Description	Memo	Amount
9/19/17	REGIONS LHWD 02326186...	1137	CNA INSURANCE	3030879561	-1,148.00
			TOTAL 6340-INSURANCE EXPENSE		-1,148.00
			TOTAL EXPENSES		-2,094.68
			OVERALL TOTAL		4,197.16

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

Jeanne Barnes Bryant

September 2017 Fees	\$253.30
September 2017 Overhead Expense	\$23.80

Receivership Management, Inc.

September 2017 Fees	\$2,117.05
September 2017 Overhead Expense	\$282.10
September 2017 Expenses	\$256.88

Everett Sinor

September 2017 Fees & Expenses	<u>\$3,974.38</u>
--------------------------------	-------------------

**Proposed Payment out of Receivership Estate** **\$6,907.51**

Graham Matherne

September 2017 Fees & Expenses	<u>\$8,289.00</u>
--------------------------------	-------------------

**Proposed Interim Taxation of Costs** **\$8,289.00**

FILED  
Date 11-28, 2017 at 11:05 AM  
Entered: \_\_\_\_\_  
SUF. TOURET, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: \_\_\_\_\_ *JS*

**EXHIBIT  
E**

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT			September 2017
9/1/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE FILING	\$163.00
9/5/2017	Jeanne Barnes Bryant	UPDATE FROM ROB MOORE RE FIRE	\$163.00
9/6/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS	\$163.00
9/7/2017	Jeanne Barnes Bryant	QUESTION RE CNN, UPDATE RE FIRE	\$32.60
9/8/2017	Jeanne Barnes Bryant	QUESTION RE CCN	\$163.00
9/11/2017	Jeanne Barnes Bryant	UPDATE FROM ROB MOORE RE CCN, REVIEW AND SIGN CHECKS	\$32.60
9/12/2017	Jeanne Barnes Bryant	UPDATE FROM ROB MOORE RE CCN; REVIEW ORDER, REPORT GERALD WILLIAMS FROM ROB MOORE	\$48.90
9/14/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL, REVIEW REPORT, UPDATE RE FIRE	\$32.60
9/21/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT, REVIEW SAME, QUESTION RE AFFIDAVIT	\$32.60
9/22/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS, QUESTION RE REPORT	\$32.60
<b>Total</b>			<b>\$277.10</b>

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		September 2017
9/1/2017	Cody Smith	REVIEW P&L THRU 12/31/16 FROM T. STEPHENS CPA OFFICE RE F1120 EXTENSION. POST DEPOSITS THRU 8/31/17. 0.6 \$123.00 \$73.80
9/5/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PAY CURRENT UTILITY INVOICES. 0.3 \$123.00 \$36.90
9/5/2017	Robert E. Moore, Jr.	REVIEW UPDATE FROM G. WILLIAMS AND FORWARD TO E.SINOR. 0.1 \$153.00 \$15.30
9/6/2017	Cody Smith	PHONE CALL WITH E.SINOR RE 8/31/17 CASH FLOW STATEMENT AND SEPTEMBER ESTIMATES. 0.6 \$123.00 \$73.80
9/7/2017	Cody Smith	REVIEW F1041 PREPARED BY T. STEPHENS CPA OFFICE. DISCUSS FINANCIAL REQUEST FROM TPUC TO APPLY FOR CCN. 1.2 \$123.00 \$147.60
9/7/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; POST AND UPDATE FINANCIALS RE: SAME; FORWARD 0.5 \$50.00 \$25.00
9/7/2017	Lauren B. Garcia	RECONCILE BANK STATEMENT, RECORD INVOICE 0.3 \$50.00 \$15.00
9/8/2017	Cody Smith	PROVIDE AND DISCUSS FINANCIALS WITH E.SINOR FOR CCN REQUEST THRU 8/31/17. 1.7 \$123.00 \$209.10
9/11/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME 0.4 \$50.00 \$20.00
9/11/2017	Jere P. Cowan	EMAIL G. LEE RE: WEB POSTING OF STATUS REPORT 0.1 \$50.00 \$5.00
9/11/2017	Robert E. Moore, Jr.	DRAFT AND PREPARE PREFILED TESTIMONY 1.3 \$153.00 \$198.90
9/12/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. 0.5 \$123.00 \$61.50
9/12/2017	Jere P. Cowan	PAY EXPENSES, FEES FOR EVERETT 0.5 \$50.00 \$25.00

LAUREL HILLS WATER DISTRICT

September 2017

Date	Name	Description	Hours	Amount	Total
9/12/2017	Robert E. Moore, Jr.	CALL RE: CCN APPLICATION 1.0; UPDATE ON TELECONFERENCE WITH G.WILLIAMS RE: OPERATIONS, UPDATE ON SCHEDULED START ON SURVEY WITH J.STATON .10	1.1	\$153.00	\$168.30
9/13/2017	Cody Smith	REVIEW 7/1/17 THRU 8/31/17 FINANCIALS STATEMENTS. PAYOUT OF O/S INVOICES FROM COURT APPROVALS.	0.5	\$123.00	\$61.50
9/15/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 08-31-17. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION.	0.4	\$123.00	\$49.20
9/15/2017	Robert E. Moore, Jr.	EMAIL TO K. GRAMS RE: ENGAGEMENT OF JAKE STATON FOR SURVEY WORK .10; EMAILS TO J.STATON AND E.SINOR RE: PROJECT AND DOWN PAYMENT .10	0.2	\$153.00	\$30.60
9/18/2017	Jere P. Cowan	RECEIPT OF CUMBERLAND COUNTY TRUSTEE STATEMENT; PROCESS PAYMENT FOR SAME; FORWARD SAME	0.4	\$50.00	\$20.00
9/18/2017	Robert E. Moore, Jr.	EMAIL FROM E.SINOR RE: HEARING ON MOTION TO AMEND REVIEW AND RESPOND .10; REVIEW AND APPROVE MICROBAN REPORT AND INVOICE .10	0.2	\$153.00	\$30.60
9/19/2017	Cody Smith	DISCUSSION WITH E. SINOR RE FS AND C.N.A INSURANCE AUDIT CREDIT ERROR.	0.7	\$123.00	\$86.10
9/19/2017	Jere P. Cowan	PROCESS INSURANCE EXPENSE PAYMENT; FORWARD SAME	0.4	\$50.00	\$20.00
9/20/2017	Lauren B. Garcia	RUN EXPENSE RECOVERABLE REPORT	0.1	\$50.00	\$5.00
9/21/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.3	\$50.00	\$15.00
9/21/2017	Robert E. Moore, Jr.	REVIEW AND APPROVE REPORT .10	0.1	\$153.00	\$15.30
9/22/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.3	\$123.00	\$36.90
9/22/2017	Jere P. Cowan	EMAIL FROM R. MOORE RE: FINAL REPORT AND FINALIZING AFFIDAVIT	0.1	\$50.00	\$5.00
9/26/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.4	\$50.00	\$20.00
9/26/2017	Robert E. Moore, Jr.	TRAVEL TO CROSSVILLE FOR LAND SURVEY MEETING 1.75	1.75	\$153.00	\$267.75
9/27/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.4	\$50.00	\$20.00

**LAUREL HILLS WATER DISTRICT**

**September 2017**

Date	Name	Description	Hours	Rate	Total
9/27/2017	Lauren B. Garcia	POST DEPOSITS	0.2	\$50.00	\$10.00
9/27/2017	Robert E. Moore, Jr.	WORK WITH JAKE STATON ON LAND SURVEY, PIPE LOCATION, REVIEW MAPS, OUTLINE OF PROJECT 3.3; UPDATES TO J. BRYANT AND E. SINOR 3. CALL WITH G. MATHERNE RE: TIMING AND STRATEGY IN LIGHT OF DISMISSAL OF TPUC MOTION TO AMEND. 2	3.8	\$153.00	\$581.40
9/28/2017	Cody Smith	PAY FEE AND EXP ACCRUAL THRU CURRENT APPROVALS.	0.2	\$123.00	\$24.60
9/28/2017	Jere P. Cowan	CONFERENCE WITH AND PROCESS EXPENSE PAYMENTS; FORWARD FOR J. BRYANT APPROVAL; FORWARD SAME	0.5	\$50.00	\$25.00
<b>Total</b>					<b>\$2,399.15</b>



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

October 5, 2017

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

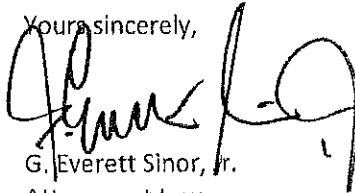
*RE: September 2017 Billings – RMI/Laurel Hills Water System in Receivership*

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,

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

G. Everett Sinor, Jr.  
Attorney at Law

Enclosure

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

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
9/5/2017	Email from G Williams re fire @ Cumberland Pointe; forward to R Moore w comments	0.1		
9/6/2017	Email from Lansford & Stephens re new owner; T.C. w A Conklin on developments on mountain; email to C Smith w questions re financials for LHWS; T.C. w C Smith & R Moore re LHWS matters; email w A Conklin re LHWS matters; T.C. w A. Conklin re same	1.1		
9/7/2017	T.C. w R Moore re LHWS matters; drafting of LHWS documents; email to R Moore re LHWS documents	2.0		
9/8/2017	Financial preparation and CCN petition preparation; conf. call w G Matherne conf. call w D Foster	1.8		
9/10/2017	Review of CCN docs; email to R Moore & G Matherne; conference call w R Moore & G Matherne; revisions to petition;	1.8		
9/11/2017	V.M. for K Johnston @ AJG Insurance re: check back from insurer & payroll audit adjustment; T.C. w K Johnston re same; T.C. w P Fulton w TPUC re filing requirements; T.C. w G Matherne & R Moore re LHWS issues; revisions to petition & ancillary docs and information	3.3		
9/12/2017	T.C. w S Dillon @ the TPUC re filing; review of pre-filed testimony & petition; review G Williams email re different LHWS issues; modification of LHWS financials; T.C. w D Foster re LHWS; T.C. w G Williams re LHWS issues; email to R Moore & G Matherne re same; finalize petition & email filing	3.2		
9/13/2017	19th Receiver's report work; revisions to financials; email to C Smith requesting information; email to G Matherne re condemnation petition; T.C. w D Carter w Cumberland Pointe re fire & billings	1.1		
9/14/2017	Revisions to 19th report; email to J Bryant & R Moore w report & financials; review of K Johnston (AJG) email re insurance)	0.4		
9/15/2017	email from R Moore re supply pipe line; C Smith emails re financials and insurance policy impact; modification of financials; email to K Johnston re insurance	0.1		
9/18/2017	review C Smith email on insurance payment; A Conklin email on Motion to Amend. Forward same to R Moore; email from K Johnston on insurance payment	0.1		

9/19/2017	review of C Smith spreadsheet on insurance payments; T.C. w C Smith re same; emails to C Smith re insurance questions; T.C. w K Johnston re insurance payments and reconciliation; emails to K Johnston re same; review of MicroLab invoice & results; T.C. w R Moore re LHWS matters	2.1		
9/20/2017	email to C Smith re billing statements; review of G Matherne email re water tower property and response to inquiry; review billings; email to C Smith re same; T.C. w K Johnston re Insurance reimbursement; email to C Smith & R Moore re same; revisions to financials & 19th report; transmission of draft of same to R Moore & J Bryant w R Moore affidavit	2.0		
9/21/2017	T.C. w D Foster; pull docket on CCN petition; review RMI billings & email to R Moore re same	0.2		
9/22/2017	Review motion to amend from TPUC & response from LH Condos POA; review R Moore emails on 19th report; send 19th report & affidavit to K Cashman-Grams for review; travel to Cookeville for hearing; attend hearing; travel to Nashville; T.C. w G Matherne re day's events	5.9		
9/26/2017	Review K Cashman-Grams email re cut offs; response to same; V.M. for D Carter w Cumberland Pointe condos re same; T.C. w G Williams re paving work & other LHWS matters; T.C. w R Moore re LHWS matters; review of K Johnston email on audit; response to same; review of deposit slips from Lansford & Stephens; review of G Matherne response on update on action	0.7		
9/27/2017	K Johnston email on auditor; T.C. w payroll auditor (C Smith) re GL insurance policy; T.C. w G Matherne re LHWS matters; T.C. w R Moore re LHWS matters, including survey and trip to Renegade Mountain	1.1		
9/28/2017	Message from D Carter; T.C. w D Carter re Cumberland Pointe turn-off procedure and practice & fire @ complex; email to K Cashman-Grams re same	0.4		
9/29/2017	Message from D Carter re valve shut-off process & severing of line	0.1		
9/30/2017	email to D Foster re LHWS filing	<u>0.1</u>		
	<b>Hourly Billing Total</b>	<b>27.6</b>	<b>\$140.00</b>	<b>\$3,864.00</b>
		<u>Miles</u>	<u>Rate</u>	
9/22/2017	Mileage from Nashville to Cookeville to Nashville	<u>162.0</u>		
	<b>Mileage Total</b>	<b>162.0</b>	<b>\$0.47</b>	<b>\$76.14</b>

9/12/2017	Postage for filing of CCN Petition	\$34.24	
	<b>Other Expenses Reimburseable Total</b>		<u>\$34.24</u>
	<b>Balance Owed this month</b>		<b>\$3,974.38</b>
	Previous Balance Owed	\$4,428.91	
	<b>Total Amount Due and Payable</b>		<b>\$8,403.29</b>

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

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09/12/17 06:02 PM

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001	001040 (001)		TO \$	9.77
	Ground Commercial			
	Tracking# 1Z303Y3Y0306935652			
002	008237 (022)		TO \$	14.92
	First Class Package			
	Tracking# MMWJNUUV6BJFK			
003	500005 (025)		T1 \$	3.96
	Manilla Med 12X9	QTY 4		
	Reg Unit Price	\$	0.99	
004	020587 (002)		T1 \$	3.05
	12x9x3 Box			
005	030175 (016) ***S****		TO \$	1.89
	12x9x3 Serv Std			

SubTotal \$ 33.59  
State and County Tax (T1) \$ 0.65  
Total \$ 34.24

MASTERCARD \$ 34.24  
ACCOUNT NUMBER \* \*\*\*\*\*3631  
Appr Code: 09624Z (I) Sale

ENTRY METHOD: ChipRead  
MODE: Issuer  
AID: A0000000041010  
TVR: 000008000  
TSI: E800  
AC: 10EAF968ECF726B7  
ARC: 00

Receipt ID 82997742777066888975 008 Items  
CSH: Diane Tran: 5489 Reg: 002

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(615) 244-0020

OCTOBER 9, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1043975

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 SEPTEMBER 30, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$8,289.00
	-----
TOTAL THIS INVOICE	\$8,289.00
	-----
PREVIOUSLY BILLED AND OUTSTANDING	\$19,386.00
	-----
TOTAL AMOUNT DUE	\$27,675.00
	=====

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

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

OCTOBER 9, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1043975

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 SEPTEMBER 30, 2017

09/07/17	E-MAILS WITH E. SINOR REGARDING TPUC ISSUES. J. GRAHAM MATHERNE .30 hours at 270.00 per hour.	81.00
09/08/17	E-MAILS WITH E. SINOR REGARDING POTENTIAL FILINGS AND REVIEW DRAFTS OF SAME (.40); EDITS TO SAME AND FURTHER E-MAILS WITH SINOR (.80); TELEPHONE CONFERENCE WITH SINOR AND MOORE REGARDING SAME (.60). J. GRAHAM MATHERNE 1.80 hours at 270.00 per hour.	486.00
09/10/17	REVIEW FURTHER EDITS TO POTENTIAL FILINGS (.50); TELEPHONE CONFERENCE WITH R. MOORE AND E. SINOR REGARDING SAME (.60); E-MAIL TO SINOR REGARDING SAME (.30). J. GRAHAM MATHERNE 1.40 hours at 270.00 per hour.	378.00
09/12/17	WORK REGARDING EDITS AND REVIEW OF POTENTIAL FILING (.50); E-MAILS AND TELEPHONE CONFERENCES WITH SINOR AND MOORE REGARDING SAME (.50); REVIEW INFORMATION REGARDING SERVICE AREA/SERVICE RIGHTS AND MAPPING ISSUES (.60). J. GRAHAM MATHERNE 1.60 hours at 270.00 per hour.	432.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
MATTER NUMBER: 008264.000036  
INVOICE NO.: 1043975

Oct 9, 2017  
PAGE 3

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09/19/17	COMPILE INFORMATION REGARDING WATER SUPPLY LINE FOR SURVEYOR (.50); TELEPHONE CONFERENCE WITH R. MOORE REGARDING SAME (.10); E-MAIL TO SURVEYOR REGARDING SAME (.40). J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour.	270.00
09/20/17	FILE ORGANIZATION REGARDING SERVICE AREA ISSUES AND PREVIOUS GRANTS REGARDING SAME. J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00
09/21/17	REVIEW MATERIALS REGARDING SERVICE AREA ISSUES AND RELATED MATTERS (.60); FURTHER WORK REGARDING ISSUES RELATING TO PROVISIONAL CCN REQUEST (.50); OUTLINING FURTHER ISSUES AS TO RESPONSE TO MOTION TO DISMISS AND REVIEW OF TPUC MOTION TO AMEND AND RELATED MATTERS (.80). J. GRAHAM MATHERNE 1.90 hours at 270.00 per hour.	513.00
09/22/17	NUMEROUS E-MAILS WITH SURVEYOR AND WITH R. MOORE REGARDING INFORMATION NEEDED FOR SURVEY (.90); REVIEW OF DEEDS OF TRUST AND CONVEYANCE DOCUMENTS AND PLATS AND RELATED INFORMATION REGARDING SAME (1.40). J. GRAHAM MATHERNE 2.30 hours at 270.00 per hour.	621.00
09/25/17	FURTHER WORK REGARDING PLAT AND DESCRIPTION INFORMATION FOR SURVEYOR (.90); TELEPHONE CONFERENCE WITH E. SINOR REGARDING COURT HEARING ON TPUC MOTIONS (.30); REVIEW FILE REGARDING IMPACT OF SAME (.40). J. GRAHAM MATHERNE 1.60 hours at 270.00 per hour.	432.00
09/26/17	TELEPHONE CONFERENCES WITH R. MOORE AND J. STATON REGARDING SURVEY ISSUES (.60); TELEPHONE CONFERENCE WITH COUNSEL REGARDING MATTERS IN PENDING CASES AND COURT RULING AND PROVISIONAL CCN ISSUES (.40); TELEPHONE CONFERENCE WITH E. SINOR REGARDING SURVEY ISSUES AND CONVERSATIONS WITH OTHERS REGARDING STATUS AND REGARDING SERVICE AREA MAP AND REGARDING MOTION RESPONSES AND RELATED MATTERS (.50); WORK/DRAFTING ON RESPONSES TO MOTIONS TO DISMISS (2.30); REVIEW STATUTES AND CASELAW REGARDING CONDEMNATION (.90). J. GRAHAM MATHERNE 4.70 hours at 270.00 per hour.	1269.00

CONTINUE NEXT PAGE



JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
 MATTER NUMBER: 008264.000036  
 INVOICE NO.: 1043975

Oct 9, 2017  
 PAGE 4

09/27/17 E-MAILS WITH COUNSEL REGARDING RESPONSE TO  
 MOTIONS TO DISMISS (.50); REVIEW RULE 19 PARTY  
 JOINDER LAW (.60); FURTHER LEGAL RESEARCH  
 REGARDING "NECESSITY" AND MATTERS RELATING TO  
 EMINENT DOMAIN (.90).  
 J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

09/28/17 FURTHER DRAFTING AS TO RESPONSE TO TERRA  
 MOUNTAIN MOTION TO DISMISS (1.90); FILE REVIEW  
 REGARDING SAME AND REGARDING RESPONSE TO MOY  
 TOY MOTION TO DISMISS (1.30); LEGAL RESEARCH  
 REVIEW REGARDING SAME (2.0).  
 J. GRAHAM MATHERNE 5.20 hours at 270.00 per hour. 1404.00

09/29/17 DRAFTING AND FILE REVIEW AND FURTHER LEGAL  
 RESEARCH REGARDING RESPONSES TO MOTION TO  
 DISMISS.  
 J. GRAHAM MATHERNE 3.80 hours at 270.00 per hour. 1026.00

09/30/17 FURTHER WORK ON RESPONSES TO MOTION TO DISMISS  
 (1.90); REVIEW INFO AS TO MAP OF SERVICE AREA  
 AND RELATED MATTERS (.40).  
 J. GRAHAM MATHERNE 2.30 hours at 270.00 per hour. 621.00

TOTAL SERVICES 30.70 \$8,289.00

TOTAL THIS INVOICE \$8,289.00

PREVIOUSLY BILLED AND OUTSTANDING \$19,386.00

TOTAL AMOUNT DUE \$27,675.00

\*-----TIME AND FEE SUMMARY-----\*

*-----	TIMEKEEPER	*-----	RATE	HOURS	FEE
J MATHERNE	PARTNER		270.00	30.70	8289.00

RMI EXP RECOVERABLE LHWD  
9/1/17 Through 9/30/17

Category Description	9/1/17- 9/30/17	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-253.30	-253.30
5610-CONTRACT LABOR RMI	-2,117.05	-2,117.05
5690-RMI OH EXPENSE	-305.90	-305.90
TOTAL 5100 FEES RMI	-2,676.25	-2,676.25
5150 FEES LEGAL		
5400-LEGAL FEES	-12,263.38	-12,263.38
TOTAL 5150 FEES LEGAL	-12,263.38	-12,263.38
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-8.20	-8.20
6210-POSTAGE	-5.52	-5.52
6350-TRAVEL EXPENSE	-207.70	-207.70
TOTAL 5300 EXPENSES	-256.88	-256.88
OVERALL TOTAL	-15,196.51	-15,196.51

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

FILED  
Date 11-28, 2017 at 11:00 AM  
Entered:  
SUF TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: JAP

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AFFIDAVIT OF KELLY CASHMAN-GRAMS

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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  
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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 September 1, 2017 through September 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.

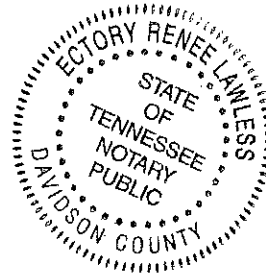
**FURTHER THE AFFIANT SAITH NOT.**

Kelly Cashman Grams  
KELLY CASHMAN GRAMS

Sworn to and subscribed before me this  
16<sup>th</sup> day of November, 2017.

Renee Lawless  
NOTARY PUBLIC

My commission expires: 1/9/2018



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

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Docket No. 2012-CH-560  
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FILED  
Date 11-28, 2017 at 11:00 AM  
Entered: \_\_\_\_\_  
SUE TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY: \_\_\_\_\_ *JP*

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

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

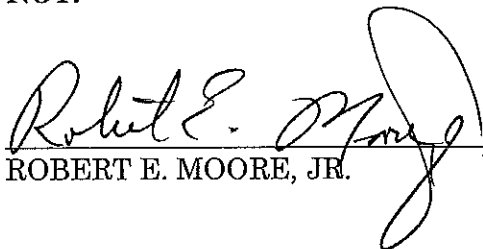
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

*[intentionally blank]*

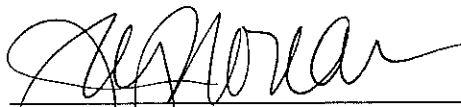
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the 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 \$6907.51 (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 \$8289.00 (i.e., the amount of fees and expenses attributable to Mr. Matherne set forth in the Receiver's Motion).

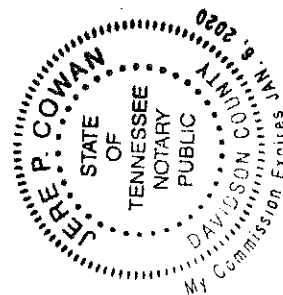
FURTHER THE AFFIANT SAITH NOT.

  
ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

24<sup>th</sup> day of October, 2017.

  
Notary Public  
Commission Expires: 1/6/2020





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.

RECEIVED  
NOV 14 2017

BY: *AP*

Docket No. 2012-CH-560  
Chancellor Thurman

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ORDER GRANTING RECEIVER'S MOTION

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On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the \_\_\_\_ day of November, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for September of 2017, and approve payment to the Receiver of a portion of such fees and expenses out of receivership estate assets, and tax costs on an interim basis to the Authority for a portion of such fees and expenses.

The Receiver's motion being well taken, and no opposition being filed with this Honorable Court within ten (10) calendar days of the filing date of the Receiver's motion, it is **ORDERED, ADJUDGED, and DECREED** that the Receiver's fees and expenses are hereby **APPROVED** in the amount of \$15,196.51.

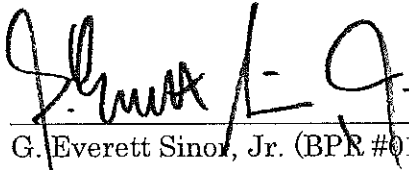
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$6907.51 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 \$8289.00.

**ENTERED** this \_\_\_ day of \_\_\_\_\_, 2017.

\_\_\_\_\_  
The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:

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

Counsel for Receivership Management, Inc.

3504 Robin Road

Nashville, Tennessee 37204

615.969.9027

Everett.Sinor@gmail.com

Certificate of Service

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

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

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

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

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

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

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

via the United States Mails, postage prepaid, this \_\_\_\_ day of \_\_\_\_\_, 2017.