

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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

RECEIVER'S MOTION FOR APPROVAL OF FEES AND EXPENSES AND
AUTHORIZATION FOR PAYMENT OF CERTAIN FEES AND EXPENSES

Robert E. Moore, Jr., Attorney and President of Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed Receiver of the Laurel Hills water system in Receivership estate [hereinafter the "LHWS"] previously controlled by Laurel Hills Condominiums Property Owners Association [hereinafter the "Laurel Hills Condominiums POA"], 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.

1. 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.¹

2. As shown in Collective Exhibit A, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, President of the Receiver, and other persons at the Receiver's office, including Ms. Jacqueline Lawson, Ms. Lauren Garcia, Ms. Patty Mitchell, and Ms. Elizabeth Breeding performed work for this Receivership estate for the period of October 1, 2020 through March 31, 2021 in the amount of \$492.86.² 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 A for the period October 1, 2020 through March 31, 2021 in the amount of \$1081.94.

3. 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 B and incorporated herein by reference; *see also* Affidavit of Robert E. Moore, Jr., attached hereto as Exhibit C and incorporated herein by reference.

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

- a. for Mr. Moore & others at the Receiver for October of 2020: \$197.55;
- b. for Mr. Sinor working under Mr. Moore for October of 2020: \$1025.94;
- c. for Mr. Moore & others at the Receiver for November of 2020: \$69.80;

¹ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

² This figure includes incurred expenses, charged by Receivership Management, Inc., which total \$4.16.

- d. for Mr. Sinor working under Mr. Moore for November of 2020: \$42.00;
- e. for Mr. Moore & others at the Receiver for December of 2020: \$20.10;
- f. for Mr. Sinor working under Mr. Moore for December of 2020: \$--0--;
- g. for Mr. Moore & others at the Receiver for January of 2021: \$7.90;
- h. for Mr. Sinor working under Mr. Moore for January of 2021: \$---0---
- i. for Mr. Moore & others at the Receiver for February of 2021: \$166.41;
- j. for Mr. Sinor working under Mr. Moore for February of 2021: \$14.00;
- k. for Mr. Moore & others at the Receiver for March of 2021: \$31.10;
- l. for Mr. Sinor working under Mr. Moore for March of 2021: \$--0--.

5. 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 \$1574.80, and further **MOVES** this Court to authorize payment of fees and expenses out of Laurel Hills Water System in Receivership estate's funds in the amount of \$1574.80.

DATED: June 14, 2021.

Respectfully Submitted,

Laurel Hills Water System in Receivership

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

G. Everett Sinor, Jr.
G. Everett Sinor, Jr. (BPR #017564)
Attorney at Law
Counsel for Receivership Management, Inc.
495 Sadler Way
Franklin, Tennessee 37069
615-969-9027 (Phone)
Everett.Sinor@gmail.com (Email)

by Robert E. Moore, Jr.
by permission
granted on
June 19, 2021

Certificate of Service

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

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

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

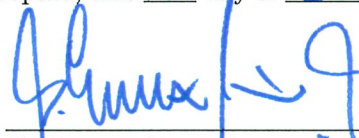
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
374 Forks of the River Parkway
Sevierville, Tennessee 37862

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

Randall A. York, Esq.
Moore, Rader
Attorneys at Law
46 North Jefferson Avenue
Cookeville, Tennessee 38501

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

via the United States Mails, postage prepaid, this 14th day of June, 2021.



G. Everett Sinor, Jr.

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - OCTOBER 2020-MARCH 2021**

<u>Receivership Management, Inc.</u>	
Oct 2020-Mar 2021 Fees & Overhead Exp.	\$488.70
Oct 2020-Mar 2021 Expenses	\$4.16
<u>Everett Sinor</u>	
Oct 2020-Mar 2021 Fees & Expenses	<u>\$1,081.94</u>
Proposed Payment out of Receivership Estate	\$1,574.80

EXHIBIT
A

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **October 2020**

Date	Client	Description	Quantity	Rate	Total
10/8/2020	Jacqui D. Lawson	POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 09-30-20. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 09-30-20.	0.2	\$79.00	\$15.80
10/19/2020	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUALS. PREPARE 202004-202009 FINANCIALS AND SCAN TO E.SINOR PER REQUEST	1.1	\$79.00	\$86.90
10/19/2020	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: UPCOMING DRAFTS ON CLOSURE .2	0.2	\$153.00	\$30.60
10/21/2020	Robert E. Moore, Jr.	REVIEW COMPLETED INTERIM DISTRIBUTION DRAFTS AND APPROVE .10; CALL FROM E.SINOR RE: SAME .10	0.2	\$153.00	\$30.60
10/23/2020	Elizabeth E. Breeding	NOTARIZE AFFIDAVIT OF R. MOORE IN SUPPORT OF MOTION TO AUTHORIZE AN INTERIM DISTRIBUTION OF ESTATE ASSETS TO THE CRAB ORCHARD UTILITY DISTRICT & AFFIDAVIT OF R. MOORE RE: FEES AND EXPENSES, SCAN, SAVE TO FILE, SEND VIA EMAIL & MAIL TO E. SINOR, METER, POSTAGE & DROP IN DOWNSTAIRS OUTGOING MAIL BIN	0.3	\$61.00	\$18.30
10/26/2020	Elizabeth E. Breeding	EMAIL FROM E. SINOR RE: RECEIVER'S MOTION FOR APPROVAL OF FEES AND EXPENSES, PROPOSED ORDER & ACCOUNTING & SAVE TO FILE	0.1	\$61.00	\$6.10
10/26/2020	Lauren B. Garcia	RECEIPT OF QUARTERLY FILING, SAVE TO FILE	0.1	\$61.00	\$6.10
Total					\$194.40

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		November 2020		
11/3/2020	Lauren B. Garcia	0.1	\$79.00	\$7.90
11/5/2020	Jacqui D. Lawson	0.1	\$79.00	\$7.90
11/16/2020	Lauren B. Garcia	0.1	\$61.00	\$6.10
11/17/2020	Jacqui D. Lawson	0.3	\$79.00	\$23.70
11/17/2020	Lauren B. Garcia	0.3	\$79.00	\$23.70
Total				\$69.30

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		December 2020	
12/31/2020	Jacqui D. Lawson	0.1	\$79.00
	POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 11.30.20. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENT		
12/21/2020	Paty B. Mitchell	0.1	\$61.00
	CHECK DATE AND ADD TO FILE		
12/21/2020	Paty B. Mitchell	0.1	\$61.00
	FILE INTO CABINETS FROM BOX		
Total			\$20.10

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT

January 2021

1/5/2021	Jacqui D. Lawson	POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 12.31.20. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 12.31.20.	0.1	\$79.00

Total

\$7.90

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		February 2021
2/3/2021	Jacqui D. Lawson	0.1 \$79.00 \$79.00
POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 1/31/21. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION.		
2/5/2021	Jacqui D. Lawson	1 \$79.00 \$79.00
COMPLETE CODING CHANGES; POST EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 12.31.20. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS FOR 01.01.20 THRU 12.31.20. EMAIL E. SINOR REGARDING SAME; ROLL OVER QUICKEN 2020 TO 2021 SETUP TRIAL BALANCE FOR 2021 BOOKS		
2/26/2021	Jacqui D. Lawson	1 \$79.00 \$79.00
COMPLETE CLEAN UP OF QUICKEN AND ROLLOVER 2020 TO 2021		
Total		\$165.90

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT				March 2021
3/3/2021	Jacqui D. Lawson	POST INTEREST AND EXPENSE ACCRUALS TO GL. RECONCILE BANK ACCOUNTS. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 2/28/21. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION.	0.1	\$79.00
3/3/2021	Robert E. Moore, Jr.	REVIEW BILLINGS OF E.SINOR FOR APPROVAL .10	0.1	\$153.00
3/18/2021	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00
Total				\$31.10

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

November 3, 2020

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

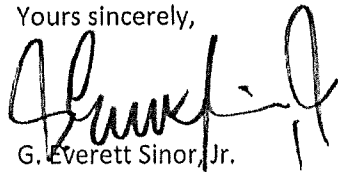
RE: October 2020 Billings – RMI/Laurel Hills Water System in Receivership

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>	Hours	<u>Rate</u>	<u>Fee</u>
10/5/2020	Email to L Garcia & J Lawson re financials for the estate	0.1		
10/7/2020	Review of GSA & other LHWS materials; draft of motions, accounting, proposed orders and affidavit; preparation of proposed indemnification & hold harmless agreement for the COUD; review of discharge of receiver form	3.0		
10/8/2020	Email from J Lawson re accounting for LHWS	0.1		
10/14/2020	Email from L Garcia re information for accounting	0.1		
10/15/2020	T.C. w Randy York about timing of filings; T.C. w A Conklin re same	0.1		
10/20/2020	Review banking docs & financial reports from RMI re LHWS; finalize accounting draft, motion drafts and proposed order drafts	1.9		
10/21/2020	T.C. w R Moore re motions, orders & accounting; emails to R York, A Conklin, K Cashman-Grams & R Moore re same	0.4		
10/23/2020	Email from K Cashman-Grams w affidavit; T.C. w S Tollett, Cumberland County C&M re form of affidavits; email from L Breeding re R Moore affidavit & response	0.2		
10/26/2020	Finish/complete motion to approve fees and expenses & accounting; email to parties & intervenors w/ motion & accounting; draft cover letter to Ms. Tollett & mailing	<u>1.1</u>		
	Hourly Billing Total	7.0	\$140.00	\$980.00
		Miles	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
10/26/2020	Postage for Mailing of Accounting & Motion for F&E	\$45.94		
	Other Expenses Reimburseable Total			<u>\$45.94</u>
	Balance Owed this month			\$1,025.94
	Previous Balance Owed		\$1,523.49	

Total Amount Due and Payable

\$2,549.43

Please remit payment to: Everett Sinor, 101 Creekside Crossing, Suite 1700, #288, Brentwood, TN 37027

The UPS Store #3355
101 Creekside King Ste 1700
Brentwood, TN 37027
615-377-8100

Terminal: 70 Date.: 10/26/2020
Employee: Time.: 12:35 PM
Cashier: [Redacted]

ITEM NAME	QTY	PRICE	TOTAL
-----------	-----	-------	-------

First Class Package	1	\$35.00	\$35.00
Tax			\$0.00

HMJJKUJQRUC09
Tracking Number
Ground Commercial

	1	\$10.94	\$10.94
Tax			\$0.00

HMJJKUUVSQ2T
Tracking Number - 1Z303V3V0326406258

Subtotal	\$45.94
Shipping/Other Charges	\$0.00
Total tax	\$0.00

Total \$45.94

Cards \$45.94

Items Designated NR are NOT eligible
for Returns, Refunds or Exchanges.

US Postal Rates Are Subject to Surcharge.



1 2 0 1 0 2 6 3 3 5 5 8 0 0 2 5 8

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

December 2, 2020

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

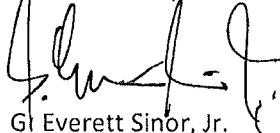
RE: November 2020 Billings for the LHWS Matter

VIA ELECTRONIC MAIL ONLY

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>	Hours	<u>Rate</u>	<u>Fee</u>
11/9/2020	Emails from R York & A Conklin re motion & response	0.1		
11/13/2020	Email to R York re motion	0.1		
11/16/2020	Email from Ashley w the Cumberland County C&M re order; T.C. w R Moore re emails to R York & A Conklin	<u>0.1</u>		
	Hourly Billing Total	0.3	\$140.00	\$42.00
		Miles	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$42.00
	Previous Balance Owed		\$2,549.43	
	Total Amount Due and Payable			\$2,591.43

Please remit payment to: Everett Sinor, 1315 Burton Valley Road, Nashville, Tenn. 37215

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

March 2, 2021

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

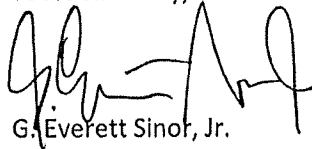
RE: February 2021 Billings – RMI/Laurel Hills Water System in Receivership

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>	Hours	<u>Rate</u>	<u>Fee</u>
2/5/2021	Review email from J Lawson re: end of year financials & response; review year end docs	<u>0.1</u>		
	Hourly Billing Total	0.1	\$140.00	\$14.00
		Miles	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$14.00
	Previous Balance Owed		\$1,067.94	
	Total Amount Due and Payable			\$1,081.94

Please remit payment to: Everett Sinor, 1315 Burton Valley Road, Nashville, Tenn. 37215

RMI EXP RECOVERABLE LHWD

10/1/2020 through 3/31/2021

10/1/2020- 11/1/2020- 12/1/2020- 1/1/2021- 2/1/2021- 3/1/2021- OVERALL
 10/31/2020 11/30/2020 12/31/2020 1/31/2021 2/28/2021 3/31/2021 TOTAL

Category	10/1/2020- 10/31/2020	11/1/2020- 11/30/2020	12/1/2020- 12/31/2020	1/1/2021- 1/31/2021	2/1/2021- 2/28/2021	3/1/2021- 3/31/2021	OVERALL TOTAL
5100 FEES RMI							
5300-RECEIVERS FEES	61.20	-	-	-	-	15.30	76.50
5610-CONTRACT LABOR RMI	133.20	69.30	20.10	7.90	165.90	15.80	412.20
TOTAL 5100 FEES RMI	194.40	69.30	20.10	7.90	165.90	31.10	488.70
5150 FEES LEGAL							
5400-LEGAL FEES	1,025.94	42.00	-	-	14.00	-	1,081.94
TOTAL 5150 FEES LEGAL	1,025.94	42.00	-	-	14.00	-	1,081.94
5300 EXPENSE							
6205-COPIES	2.50	-	-	-	-	-	2.50
6210-POSTAGE	0.65	0.50	-	-	0.51	-	1.66
TOTAL 5300 EXPENSE	3.15	0.50	-	-	0.51	-	4.16
OVERALL TOTAL	1,223.49	111.80	20.10	7.90	180.41	31.10	1,574.80

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, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

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



47AA0003-FD55-4565-920D-43C674524AA6 --- 2021/06/11 11:52:07 -8:00



operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.

3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of October 1, 2020 through March 31, 2021, 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 authorize payment to the Receiver out of receivership estate assets as requested by the Receiver.

FURTHER THE AFFIANT SAITH NOT.



KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

11th day of June, 2021


Signed on 2021/06/11 11:55:14 -0500

NOTARY PUBLIC

My commission expires: 12/19/2023


AARON J. CONKLIN
Tennessee Notary Public
Online Notary Public
Rutherford County, State Of Tennessee
My Commission Expires Dec 19, 2023
Notary Stamp 2021/06/11 11:55:14 PST

47AA0003-FD55-4565-920D-43C674524AA6 --- 2021/06/11 11:52:07 -8:00





LHWS affidavit of K Cashman-Grams Oct2020-Mar2021.docx

DocVerify ID: 47AA0003-FD55-4565-920D-43C674524AA6
Created: June 11, 2021 11:52:07 -8:00
Pages: 3
Electronic Notary: Yes / State: TN

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

E-Signature 1: Kelly Cashmangrams (KCG)

June 11, 2021 11:55:14 -8:00 [3D437D6C4D93] [170.142.177.6]
kelly.grams@tn.gov (Principal)

E-Signature Notary: Aaron J Conklin (AJC)

June 11, 2021 11:55:14 -8:00 [0E70A8FE4ED0] [170.142.177.6]
aaron.conklin@tn.gov
I, Aaron J Conklin, did witness the participants named above electronically sign this document.



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, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

2. I am the President of Receivership Management, Inc., the Receiver of the Laurel Hills Water System in Receivership [hereinafter the "Estate"], appointed in this action by the Court. In that capacity, I 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 through the date of the conveyance of the LHWS to the Crab Orchard Utility District, authorized by a Settlement Agreement and Mutual

EXHIBIT
C

Release that was effective on June 24, 2020 [hereinafter the “Global Settlement Agreement”], the Receiver having been authorized to enter into the Global Settlement Agreement by this Honorable Court by order entered on June 19, 2020.

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 expenses incurred for the period of time between October 1, 2020 through March 31, 2021 that are contained in the Receiver’s motion.

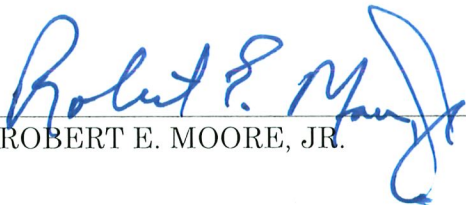
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

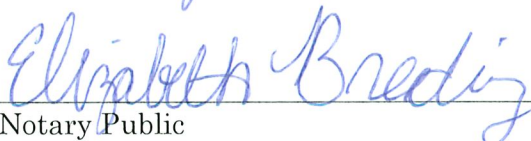
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses. Accordingly, and pursuant 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 \$1574.80 (i.e., the amount of all fees and expenses set forth in the Receiver's Motion).

FURTHER THE AFFIANT SAITH NOT.


ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

14 day of June, 2021


Notary Public

Commission Expires: 2/26/2024

