

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 [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, and Ms. Lauren Garcia performed work for this Receivership estate for the period of October 1, 2019 through March 31, 2020 in the amount of \$1610.10.² 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, 2019 through March 31, 2020 in the amount of \$1324.13. Mr. Jeff Lindsey, 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, 2019 through March 31, 2020 in the amount of \$25.00.

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:

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 \$30.80.

- a. for Mr. Moore & others at the Receiver for October of 2019: \$265.30;
- b. for Mr. Sinor working under Mr. Moore for October of 2019: \$756.00
- c. for Mr. Moore & others at the Receiver for November of 2019: \$121.95;
- d. for Mr. Sinor working under Mr. Moore for November of 2019: \$140.00;
- e. for Mr. Lindsey working under Mr. Moore for November of 2019 (incurred in August 2019): \$25.00;
- f. for Mr. Moore & others at the Receiver for December of 2019: \$46.90;
- g. for Mr. Sinor working under Mr. Moore for December of 2019: \$0.00
- h. for Mr. Moore & others at the Receiver for January of 2020: \$293.45;
- i. for Mr. Sinor working under Mr. Moore for January of 2020: \$190.13;
- j. for Mr. Moore & others at the Receiver for February of 2020: \$737.85;
- k. for Mr. Sinor working under Mr. Moore for February of 2020: \$182.00;
- l. for Mr. Moore & others at the Receiver for March of 2020: \$144.65;
- m. for Mr. Sinor working under Mr. Moore for March of 2020: \$56.00.

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.

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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 \$2959.23, 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 \$2959.23.

DATED: May 12, 2020.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: 
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. (BPR #017564)
Attorney at Law

Counsel for Receivership Management, Inc.
101 Creekside Crossing, Suite 1700, #288
Brentwood, Tennessee 37027
615-969-9027 (Phone)
Everett.Sinor@gmail.com (Email)

*By G. Everett Sinor, Jr.
by permission
granted
4/14/2020*

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

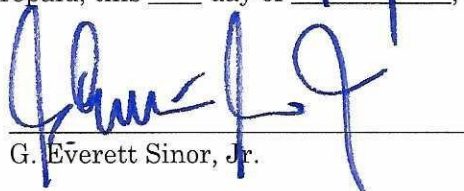
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
374 Forks of the River Parkway
Sevierville, Tennessee 37862

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

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 12th day of May, 2020.


G. Everett Sinor, Jr.

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP
SUMMARY TIME SHEET - RECEIVER'S FEES & EXPENSES - OCT 2019-MAR 2020**

Receivership Management, Inc.

Oct 2019-Mar 2020 Fees & Overhead Exp.	\$1,579.30
Oct 2019-Mar 2020 Expenses	\$30.80
Oct 2019-Mar 2020 Contract Labor	\$25.00

Everett Sinor

Oct 2019-Mar 2020 Fees & Expenses	<u>\$1,324.13</u>
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Proposed Payment out of Receivership Estate **\$2,959.23**

Graham Matherne

Oct 2019-Mar 2020 Fees & Expenses	<u>\$0.00</u>
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Proposed Interim Taxation of Costs **\$0.00**



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT					October 2019
10/3/2019	Jacqui D. Lawson	UPDATE REGISTER; PRINT STATEMENT; RECONCILE ACCOUNT; SCAN TO FILE; EMAIL E. SINOR SAME (.30); REVIEW GMATHERNE INVOICE FOR SEPTEMBER 2019 (.10)	0.4	\$79.00	\$31.60
10/3/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
10/7/2019	Robert E. Moore, Jr.	REVIEW UPDATE FROM E.SINOR .2	0.2	\$153.00	\$30.60
10/10/2019	Lauren B. Garcia	PREPARE EXPENSE RECOVERABLE AND INVOICING FOR SEPTEMBER REPORT	0.3	\$79.00	\$23.70
10/10/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
10/15/2019	Lauren B. Garcia	PREPARE SEPTEMBER FINANCIALS INCLUDING RECEIPTS/DISBURSEMENTS, REGISTER REPORT AND AUGUST INVOICES - EMAIL TO E.SINOR	0.3	\$79.00	\$23.70
10/22/2019	Lauren B. Garcia	EMAIL FROM E.SINOR RE AUGUST DEPOSIT, REPLY	0.1	\$61.00	\$6.10
10/24/2019	Elizabeth E. Breeding	CALL FROM JOHN MOORE RE: PAYMENT NOT RECEIVED & MSG TO R.M./J.L./L.G.	0.1	\$61.00	\$6.10
10/24/2019	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: LHWD, J.MOORE INQUIRY, CREDIT ACCOUNT BALANCES .3; CALL WITH J.MOORE RE: CREDIT ACCOUNT BALANCES .3	0.6	\$153.00	\$91.80
10/25/2019	Robert E. Moore, Jr.	EMAIL TO E.SINOR RE: 33RD ACTIVITY REPORT .10	0.1	\$153.00	\$15.30
10/28/2019	Lauren B. Garcia	EMAIL FROM R.MOORE RE AFFIDAVIT, METER AND MAIL TO E.SINOR	0.2	\$61.00	\$12.20
Total					\$256.90

G. Everett Sinor, Jr.
Attorney at Law

November 7, 2019

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

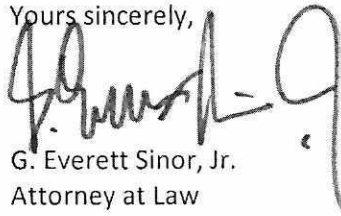
RE: October 2019 Billings – RMI/Laurel Hills Water System in Receivership

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. Sinor, Jr.', with a large, stylized flourish at the end.

G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
10/3/2019	Review Matherne invoice; review J Lawson email re bank statements; email to R Moore, J Lawson & L Garcia re LHWS issues	0.5		
10/4/2019	Email from R Moore re LHWS issue and response	0.1		
10/7/2019	Email from R Moore re plan to move forward on LHWS	0.1		
10/10/2019	T.C. w R Moore re LHWS issues	0.2		
10/16/2019	Email from A Conklin re fees	0.1		
10/21/2019	Email from L Garcia re financials and review	0.2		
10/22/2019	Prep of September financials	0.8		
10/23/2019	Email to R Moore re financials & comment; work on 33d report; T.C w R Moore re 33d report & general LHWS issues, including customer call re credit on account	2.3		
10/24/2019	T.C. w R Moore re LHWS issues	0.3		
10/28/2019	Modifications to 33d report; email to K Cashman-Grams re report; 2 T.C. w Heather w L&S re customer claim of credit; T.C. w LHWS customer re account balance; email to R Moore re same	0.5		
10/29/2019	Comm. to A Conklin re paragraph in report	0.1		
10/30/2019	Email from A Conklin re 33d report & response	0.1		
10/31/2019	Email from E Lawless re 33d report affidavit & response; T.C. w R Moore re LHWS issues	<u>0.1</u>		
	Hourly Billing Total	5.4	\$140.00	\$756.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$756.00
	Previous Balance Owed		\$2,235.35	

Total Amount Due and Payable

\$2,991.35

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

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		November 2019			
11/4/2019	Jacqui D. Lawson	APPROVAL OF FEES RE: APR-JUNE	0.2	\$79.00	\$15.80
11/5/2019	Lauren B. Garcia	RECEIPT OF FILE COURT REPORT, SCAN TO FILE AND FILE COPY	0.1	\$61.00	\$6.10
11/5/2019	Lauren B. Garcia	PROCESS PAYMENT FOR LEGAL FEES	0.1	\$79.00	\$7.90
11/6/2019	Jacqui D. Lawson	POST INTEREST; UPDATE REGISTER AND RECONCILE BANK ACCOUNT	0.2	\$79.00	\$15.80
11/8/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
11/15/2019	Robert E. Moore, Jr.	EMAIL FROM E.SINOR RE: ESTATE PLAN; REVIEW INVOICE .25	0.25	\$153.00	\$38.25
11/27/2019	Lauren B. Garcia	EMAIL TO X. TURGEON AT REGIONS REQUESTING FUNDS TRANSFER	0.1	\$61.00	\$6.10
11/27/2019	Lauren B. Garcia	POST TRANSFERS, PROCESS CHECK PAYMENTS	0.2	\$79.00	\$15.80
Total					\$113.65

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

December 2, 2019

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

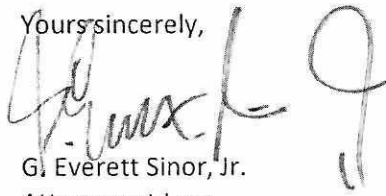
RE: November 2019 Billings – RMI/Laurel Hills Water System in Receivership

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>
11/5/2019	Completion and filing of 33rd report	0.7		
	Email from E Bolin re monies in estate and response; forward response to R Moore; email to J Lawson & L Garcia re plan for LHWS going forward; email from J			
11/7/2019	Lawson re same; email from E Bolin re update	0.2		
11/26/2019	Order from Chancellor Thurman and forward to R Moore	<u>0.1</u>		
	Hourly Billing Total	1.0	\$140.00	\$140.00
			<u>Miles</u>	<u>Rate</u>
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$140.00
	Previous Balance Owed		\$2,991.35	
	Total Amount Due and Payable			\$3,131.35

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

**Jeff Lindsey
118 PSALM PLACE
MURFREESBORO, TN 37129
615-424-9531**

**Receivership Management, Inc.
510 Hospital Dr., Suite 490
Nashville, TN 37115
Fax 615-373-4336**

LAUREL HILLS

8-20-19 0.5hrs –

**Update website posting and add 2 documents -- LAUREL
HILLS**

TOTAL HRS: 0.5 HRS @ \$50.00

HRS TOTAL:* *\$25.00

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		December 2019	
12/2/2019	Robert E. Moore, Jr.	REVIEW AND APPROVE BILLINGS STATEMENT .10	0.1 \$153.00 \$15.30
12/4/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1 \$79.00 \$7.90
12/5/2019	Jacqui D. Lawson	APPROVAL OF TRANSFER AND CONTRACT LABOR	0.2 \$79.00 \$15.80
12/9/2019	Lauren B. Garcia	RECONCILE ACCT THRU NOV 2019	0.1 \$79.00 \$7.90
Total			\$46.90

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		January 2020			
1/5/2020	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: TAX RETURN MATTERS, GENERAL UPDATE .2	0.25	\$153.00	\$38.25
1/6/2020	Robert E. Moore, Jr.	REVIEW EMAILS FROM E.SINOR AND T. STEPHENS RE: TAX RETURN MATTERS .10	0.1	\$153.00	\$15.30
1/7/2020	Robert E. Moore, Jr.	EMAILS FROM E.SINOR RE: COURT DOCKET CALL AND NO REQUIREMENT TO BE PRESENT .10	0.1	\$153.00	\$15.30
1/8/2020	Jacqui D. Lawson	UPDATE REGISTER AND RECONCILE BANK ACCOUNT X2 (.30) SETUP MONTH END CLOSE OUT & TRIAL BALANCE(1.0)	1.3	\$79.00	\$102.70
1/15/2020	Elizabeth E. Breeding	TRAVEL TO POST OFFICE TO DELIVER CERTIFIED MAIL	0.4	\$61.00	\$24.40
1/15/2020	Lauren B. Garcia	PREPARE TAX PAYMENT	0.1	\$79.00	\$7.90
1/17/2020	Elizabeth E. Breeding	ASSEMBLE MAIL & METER POSTAGE FOR TAX FORMS	0.1	\$61.00	\$6.10
1/17/2020	Jacqui D. Lawson	REFORMAT & UPLOAD TO TIN MATCHING SYSTEM FOR VERIFICATION; (.10)RECONCILE 1096 & COMPLETE 945(.30); CREATE FIRE FILE FOR UPLOAD (.20)	0.6	\$79.00	\$47.40
1/23/2020	Jacqui D. Lawson	UPDATE FINANCIAL FILES & DATES	0.1	\$79.00	\$7.90
1/28/2020	Robert E. Moore, Jr.	RESPOND TO EMAIL FROM MICROBAC RE: UPDATES FOR INVOICES, ADVISED RMI NO LONGER OPERATES THE SYSTEM .10	0.1	\$153.00	\$15.30
1/29/2020	Jacqui D. Lawson	LOG ON TO IRS FIRE VERIFY 1099 ACCEPTANCE; PRINT BACKUP FOR FILES	0.1	\$79.00	\$7.90
Total					\$288.45

G. Everett Sinor, Jr.
Attorney at Law

February 6, 2020

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

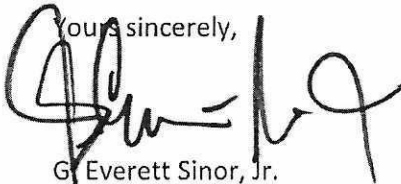
RE: January 2020 Billings – RMI/Laurel Hills Water System in Receivership

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,

A handwritten signature in black ink, appearing to read 'G. Sinor, Jr.', written over the typed name.

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>
1/5/2020	T.C. w R Moore re LHWS lingering matters	0.1		
1/6/2020	Email to L Garcia & J Lawson re LHWS; Email to T Stephens re LHWS matters; email from R Moore re conf call	0.2		
1/7/2020	Email from Cumberland County C&M re docket call & response; email from A Levondosky w Chancellor's office re appearance @ docket call; email from Randy York re closing of estate & response; forward same to R Moore; email exchange w Randy York re taxes	0.5		
1/29/2020	Email from R Moore re Microbac	<u>0.1</u>		
	Hourly Billing Total	0.9	\$140.00	\$126.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
11/5/2019	Postage for 33d report (incurred in Noy 2019)			\$64.13
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$190.13
	Previous Balance Owed		\$896.00	
	Total Amount Due and Payable			\$1,086.13

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

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

11/05/19 11:58 AM



001	008237 (022)	10 \$	32.69
	First Class Package		
	Tracking# MMWJNDUAWNTP		
002	001040 (001)	10 \$	13.29
	Ground Commercial		
	Tracking# 1Z303Y3Y0386825737		
003	500418 (002)	11 \$	15.54
	12x15 Bub Mailer #4 QTY 6		
	Reg Unit Price \$		2.59
004	500005 (025)	11 \$	0.99
	Manilla Med 12X9		

SubTotal \$ 62.51

State and County Tax (T1) \$ 1.62

Total \$ 64.13

MASTERCARD \$ 64.13

ACCOUNT NUMBER * *****6943

Appr Code: 04976Z (I) Sale

ENTRY METHOD: ChipRead

MODE: Issuer

AID: A0000000041010

TVR: 0000008000

TSI: E800

AC: DE8604AE4783D948

ARC: 00

Receipt ID 82997759853761888175 009 Items
CSH: KLARISSA Tran: 1586 Reg: 002

Appr Code: 04976Z (I) Sale

MASTERCARD

64.13



Customer Signature

CENTER COPY

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		February 2020			
2/5/2020	Jacqui D. Lawson	CONFERENCE CALL WITH TERRY STEPHENS & ESINOR REGARDING 2019 1040 (.30) SETUP PROFIT & LOSS AND GENERAL LEDGER; YEAR END CLOSE OUT 2019; CLOSE OUT JAN. 2020 (3.0)	3.3	\$79.00	\$260.70
2/5/2020	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: CONFERENCE WITH T.STEVENS, INQUIRIES BY CRAB ORCHARD COUNSEL, STATUS OF IRS MATTERS .75	0.75	\$153.00	\$114.75
2/6/2020	Jacqui D. Lawson	UPDATE REGISTER AND RECONCILE BANK ACCOUNT X2 (.30) SETUP MONTH END CLOSE OUT; INSPECT FOR PROPER DOCUMENTATION (.30)	0.6	\$79.00	\$47.40
2/8/2020	Jacqui D. Lawson	OPEN 2020 QUICKEN FILES CLOSE 2019 FILES	1	\$79.00	\$79.00
2/10/2020	Lauren B. Garcia	POST FEE AND EXP ACCRUAL	0.1	\$79.00	\$7.90
2/11/2020	Robert E. Moore, Jr.	RESPOND TO DEMOLITION INQUIRY RE: TANK .10	0.1	\$153.00	\$15.30
2/19/2020	Jacqui D. Lawson	VERIFY RETURNS SENT BY TERRY STEPHENS; ADDED EXPENSES AND INCOME; EMAILED QUESTIONS TO LANSFORD'S ABOUT DIFFERENCES RMOORE & ESINOR SAME	1.5	\$79.00	\$118.50
2/24/2020	Jacqui D. Lawson	CLOSE OUT 2019, BALANCE AND RECONCILE ALL ASSETS AND LIABILITIES; SETUP TRIAL BALANCE 12-31-2019;	1	\$79.00	\$79.00
2/28/2020	Robert E. Moore, Jr.	FOLLOW UP WITH E.SINOR RE: FINAL TAX RETURN FILING .10	0.1	\$153.00	\$15.30
Total					\$737.85

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

March 2, 2020

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

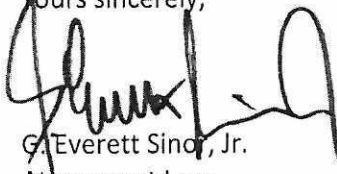
RE: February 2020 Billings – RMI/Laurel Hills Water System in Receivership

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>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
2/5/2020	Email to T Stephens, J Lawson & R Moore re conf call; review of financials & accounting; C.C. w T Stephens & J Lawson re taxes; T.C. w R Moore re same; email from J Lawson re tax materials	0.8		
2/12/2020	Email from T Stephens re taxes; email from R Moore re same	0.1		
2/13/2020	Review email from T Stephens re taxes	0.1		
2/19/2020	Email from J Lawson re tax questions to T Stephens and T Stephens response to same	0.1		
2/25/2020	Email from A Conklin re status update on taxes & response; email to J Lawson & R Moore re same	0.1		
2/27/2020	Email from J Lawson re return & response; email to T Stephens w L&S re tax return; email from T Stephens & response re return	<u>0.1</u>		
	Hourly Billing Total	1.3	\$140.00	\$182.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$182.00
	Previous Balance Owed		\$1,086.13	
	Total Amount Due and Payable			\$1,268.13

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

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		March 2020
3/4/2020	Jacqui D. Lawson	0.7 \$79.00 \$55.30
		EMAILS RECEIVED FROM ESINOR; TERRY STEPHENS; COMPILE INFORMATION NEEDED FOR FORM 4810; COMPLETE FORM 4810; EMAIL STEPHENS WITH QUESTIONS ESINOR SAME; UPDATE RMOORE MAIL SAME (.50) RECONCILE ACCT (.20)
3/4/2020	Lauren B. Garcia	0.2 \$61.00 \$12.20
		METER MAIL AND TRIP TO PO BOX TO MAIL CERTIFIED (SPLIT)
3/5/2020	Lauren B. Garcia	0.1 \$79.00 \$7.90
		POST FEE AND EXPENSE ACCRUAL
3/11/2020	Lauren B. Garcia	0.1 \$79.00 \$7.90
		PREPARE CHECK PAYMENT AND POST TRANSACTION TO REGISTER
3/17/2020	Elizabeth E. Breeding	0.1 \$61.00 \$6.10
		METER POSTAGE FOR MAILING
3/25/2020	Robert E. Moore, Jr.	0.25 \$153.00 \$38.25
		CALL WITH E.SINOR RE: REPORT AND CURRENT ACCOUNTING STATUS .25
3/31/2020	Lauren B. Garcia	0.1 \$79.00 \$7.90
		PREPARE DEPOSIT AND POST TRANSACTION
Total		\$135.55

G. Everett Sinor, Jr.
Attorney at Law

April 2, 2020

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

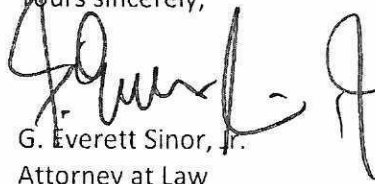
RE: March 2020 Billings for the LHWS Matter

VIA UNITED STATES FIRST CLASS MAILS & 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 in a cursive style.

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>
3/1/2020	Review estate tax return & other tax documents; review form 4810 & emails to L Garcia, J Lawson & R Moore re same; email to A Conklin re same w update on filing	0.3		
3/4/2020	Emails from T Stephens w L&S and J Lawson re tax filings; review T Stephens bill for services; email from J Lawson re IRS form & response; email from J Lawson re form 4810; email to T Stephens re same	<u>0.1</u>		
	Hourly Billing Total	0.4	\$140.00	\$56.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
	Other Expenses Reimburseable Total			<u>\$0.00</u>
	Balance Owed this month			\$56.00
	Previous Balance Owed		\$1,268.13	
	Total Amount Due and Payable			\$1,324.13

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

RMI EXP RECOVERABLE LHWD - Q4 2019

10/1/2019 through 12/31/2019

Category	10/1/2019- 10/31/2019	11/1/2019- 11/30/2019	12/1/2019- 12/31/2019	OVERALL TOTAL
5100 FEES RMI				
5300-RECEIVERS FEES	-137.70	-38.25	-15.30	-191.25
5610-CONTRACT LABOR RMI	-119.20	-75.40	-31.60	-226.20
TOTAL 5100 FEES RMI	-256.90	-113.65	-46.90	-417.45
5150 FEES LEGAL				
5400-LEGAL FEES	-756.00	-140.00	0.00	-896.00
TOTAL 5150 FEES LEGAL	-756.00	-140.00	0.00	-896.00
5150 FEES OTHER				
5697-OTHER CONTRACT LABOR	0.00	-25.00	0.00	-25.00
TOTAL 5150 FEES OTHER	0.00	-25.00	0.00	-25.00
5300 EXPENSE				
6060-RENT	0.00	0.00	0.00	0.00
6205-COPIES	-7.40	-7.30	0.00	-14.70
6210-POSTAGE	-1.00	-1.00	0.00	-2.00
TOTAL 5300 EXPENSE	-8.40	-8.30	0.00	-16.70
OVERALL TOTAL	-1,021.30	-286.95	-46.90	-1,355.15

RMI EXP RECOVERABLE LHWD - Q1 2020

1/1/2020 through 3/31/2020

Category	1/1/2020- 1/31/2020	2/1/2020- 2/29/2020	3/1/2020- 3/31/2020	OVERALL TOTAL
5100 FEES RMI				
5300-RECEIVERS FEES	-84.15	-145.35	-38.25	-267.75
5610-CONTRACT LABOR RMI	-204.30	-592.50	-97.30	-894.10
TOTAL 5100 FEES RMI	-288.45	-737.85	-135.55	-1,161.85
5150 FEES LEGAL				
5400-LEGAL FEES	-190.13	-182.00	-56.00	-428.13
TOTAL 5150 FEES LEGAL	-190.13	-182.00	-56.00	-428.13
5300 EXPENSE				
6060-RENT	0.00	0.00	0.00	0.00
6210-POSTAGE	-5.00	0.00	-9.10	-14.10
TOTAL 5300 EXPENSE	-5.00	0.00	-9.10	-14.10
OVERALL TOTAL	-483.58	-919.85	-200.65	-1,604.08

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
B

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, 2019 through March 31, 2020, that are contained in this filing.

4. Based on my personal review, and the recommendations of my staff, I have determined that the rates being charged by the Receiver for the services provided are either at a discounted or market rate for the area.

5. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses presented by the Receiver, and I have determined that all of the fees charged are fair, reasonable and proper for the services provided and that they are necessary costs of this Receivership. The invoices for fees and expenses attached as exhibits to the Receiver's Motion note the work performed, the amount charged and the person performing the work. No billings were excessive or duplicative.

6. Furthermore, either I, or my staff at my direction, have reviewed the fees and expenses for outside contractees, and, based upon this review and the recommendations of the Receiver, I have determined that both the rate and the amount of those fees and expenses are fair, reasonable and proper for the services provided.

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7. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court authorize payment to the Receiver out of receivership estate assets as requested by the Receiver.

FURTHER THE AFFIANT SAITH NOT.



Digitally signed by Kelly Cashman Grams
DN: cn=Kelly Cashman Grams,
o=Tennessee Public Utility Commission,
ou=General Counsel - Legal Division,
email=kelly.grams@tn.gov, c=US

KELLY CASHMAN GRAMS 2020.05.01 16:34:36 -05'00'

Sworn to and subscribed before me this

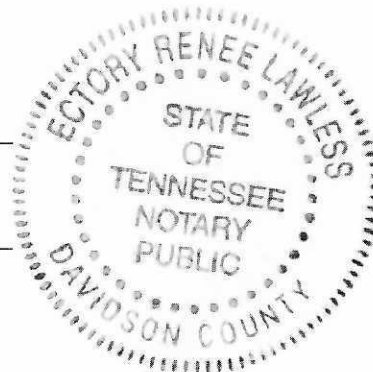
5th day of May, 2020.

Ectory R. Lawless,
J.D.

Digitally signed by Ectory R. Lawless, J.D.
DN: cn=Ectory R. Lawless, J.D., o=Tennessee Public
Utility Commission, ou=Docket and Records Manager,
email=ectory.r.lawless@tn.gov, c=US
Date: 2020.05.06 12:51:38 -05'00'

NOTARY PUBLIC

My commission expires: 03/08/2022



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

2. I am the President 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 fe

EXHIBIT
9

expenses incurred for the period of time between October of 2019 through March of 2020 that are contained in the Receiver's motion.

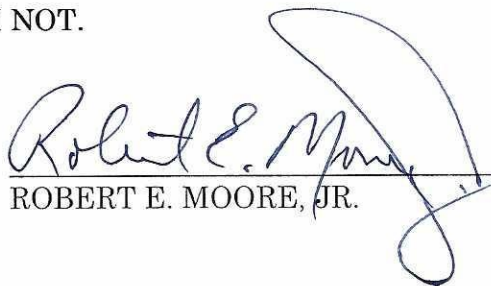
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide 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 \$2959.23 (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

14th day of April, 2020

Elizabeth Breeding
Notary Public

Commission Expires: 2/26/2024



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC, and
RENEGADE MOUNTAIN COMMUNITY CLUB,

Intervening Parties.

Docket No. 2012-CH-560
Chancellor Thurman

ORDER GRANTING RECEIVER'S MOTION

On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the ____ day of May, 2020, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for October of 2019 through March of 2020, and approve payment to the Receiver of such fees and expenses out of receivership estate assets.

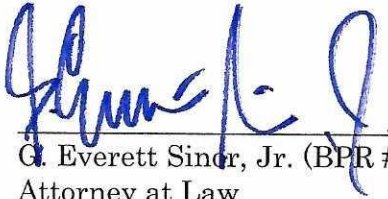
The Receiver's motion being well taken, and no opposition being filed with this Honorable Court within ten (10) calendar days of the filing date of the Receiver's motion, it is **ORDERED, ADJUDGED, and DECREED** that the Receiver's fees and expenses are hereby **APPROVED** in the amount of \$2959.23.

It is further **ORDERED, ADJUDGED, and DECREED** that payment to the Receiver in the amount of \$2959.23 from the assets of the Laurel Hills Water System in Receivership is hereby **AUTHORIZED**.

ENTERED this ____ day of _____, 2020.

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



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

Attorney at Law

Counsel for Receivership Management, Inc.

101 Creekside Crossing, Suite 1700, #288

Brentwood, Tennessee 37027

615.969.9027

Everett.Sinor@gmail.com

Certificate of Service

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

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

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

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

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

G. Everett Sinor, Jr., Esq.
Attorney at Law
Counsel for Receivership Management, Inc.
101 Creekside Crossing, Suite 1700, #288
Brentwood, Tennessee 37027

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

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

via the United States Mails, postage prepaid, this ____ day of _____, 2020.
