

**G. EVERETT SINOR, JR.**

Attorney at Law

February 27, 2017

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

*RE: Tennessee Regulatory Authority v. Laurel Hills Condominiums Property  
Owners Association, Docket No. 2012-CH-560*

VIA UNITED STATES FIRST CLASS MAILS

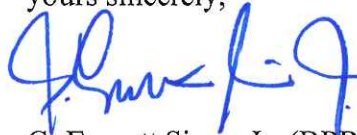
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Thirteenth 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.  
James Gass, Esq.  
Scott D. Hall, Esq.  
Melanie Davis, Esq.  
Vance Broemel, Esq.  
Roger York, Esq.

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

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RECEIVER'S THIRTEENTH 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 Thirteenth 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 Regulatory Authority [hereinafter the "TRA" or the "Authority"], 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 through Twelfth Reports, for the Receiver's activities relative to the Receivership Plan. As previously reported, the Receiver's preferred bidder, Agua Green Utility, Inc. [hereinafter "Aqua Green"], has informed the court of numerous issues it has discovered relative to the LHWS which would impact its decision to move forward and acquire the LHWS.

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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 second, third, fourth, fifth, sixth, seventh, eighth, ninth, tenth, eleventh and twelfth 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, and February 3, 2017, respectively.

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.

5. As previously reported, the Receiver instituted a condemnation action against parties that hold fee simple title and/or use and/or easement rights in and to the LHWS. This Honorable Court ordered the parties, including Moy Toy, to participate in a global mediation session in attempt to resolve all issues of dispute. On February 21, 2017, as ordered by this Court, a global mediation session was conducted, with Judge John Turnbull serving as mediator. Six (6) distinct entities participated in that global mediation session, consisting of: (1) Laurel Hills Water System in Receivership; (2) the Tennessee Regulatory Authority; (3) the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General and Reporter; (4) Laurel Hills Condominiums Property Owners' Association; (5) Moy Toy, LLC; and (6) Terra Mountain Holdings, LLC. That mediation attempt was unsuccessful as the participating entities reached an impasse. The Receiver intends to move forward to implement the Receivership Plan ordered by the Court.

#### **Operations and Other Activities of the Receiver**

6. In February of 2017, 88 of the 131 customers of the LHWS have paid their water bill. Of the 43 non-paying customers, 24 are in the Cumberland Pointe condominium units, and 19 are located elsewhere on Renegade Mountain. As to non-Cumberland Pointe condominium unit owners, there are now 10 customers who have failed to pay their water bill for two (2) or more months. All 24 Cumberland Pointe condominium unit non-paying customers have failed to pay their water bill for two (2) or more months.

7. As previously reported, the Receiver intends to send a first notice of delinquency to chronic non-paying LHWS customers with the March 2017 billing statements (giving 30 days to pay the delinquent bill), and, if necessary, send a second and

final notice of delinquency with the April 2017 billing statements (giving 15 days to pay the delinquent bill). Water service cut-offs, if any, will conform with applicable law, specifically Tenn. Comp. R. & Regs., tit. Tennessee Regulatory Authority, ch. 1220-4-3. A copy of the "First Notice Regarding Unpaid Water Bill" that the Receiver intends to send to chronic non-paying customers is attached hereto as Exhibit A and is incorporated herein by reference.

8. Mr. Gerald Williams has indicated to the Receiver that he is receiving some assistance with the provision of engineering/operational services to the LHWS, specifically with the daily draw of samples for testing. Accordingly, he has indicated a willingness to continue to provide engineering/operational services for the LHWS for the foreseeable future if necessary. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

9. At its regularly scheduled docket call for Cumberland County, conducted on February 14, 2017, the Court set a hearing date on this matter for Monday, May 15, 2017 at 1:00 p.m., with continuation of the hearing on Tuesday, May 16, 2017 at 9:00 a.m. if necessary.

#### Financial Information

10. As of February 22, 2017, there was an accounts receivable past due balance of \$26,518.20.<sup>3</sup> A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit B and is incorporated herein by reference.

11. On a cash basis, LHWS had a net gain in January, 2017 of \$8719.04. See Exhibit C, attached hereto and incorporated herein by reference. As of January 31, 2017, LHWS had a balance of \$8618.58 in its main operating account. See Collective Exhibit D,

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<sup>3</sup> Of this amount, \$5001.80 is less than a month past due, and \$21,516.40 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 B.

attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in January of 2017.<sup>4</sup>

#### **Cash Flow Projection – Anticipated Problems**

12. As previously reported, even laying aside Mr. Matherne's current and projected fees and expenses, the LHWS still faces a cash flow problem. In its projection, the Receiver attributes the cash flow problem to the fact that less customers are paying their bill than was initially projected. The Receiver continues to estimate that a break-even point for the Receiver's monthly fees and expenses is approximately \$5500.00.

13. Fees and expenses for Receivership Management, Inc. and for Mr. Sinor in December of 2016 and January of 2017 were lower than typical amounts. *See* the section entitled **Fees and Expenses of Receiver**, *infra*. Fees and expenses for Receivership Management, Inc. and for Mr. Sinor in February of 2017, though not finalized, are anticipated to be at typical amounts. The Receiver continues to anticipate that the LHWS will run out of money once those fees and expenses resume to their typical levels.<sup>5</sup> When this occurs, it will likely be necessary for further interim taxation of costs to take place to make up the difference.

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

14. 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 Authority. The

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<sup>4</sup> It should be noted that this does not include costs of this matter previously taxed on an interim basis to the Tennessee Regulatory Authority, which amount to \$89,493.23 (the amount taxed to the Authority prior to the July 1, 2016 increase in rates), AS WELL AS significant additional amounts taxed to the Authority to reflect Mr. Matherne's fees and expenses.

<sup>5</sup> Again, this does not take into account Mr. Matherne's projected fees and expenses, nor does it take into account previous costs and expenses of the receivership estate taxed on an interim basis to the Authority.

Receiver is to submit invoices to the Authority on a monthly basis for approval. These invoices are reviewed and paid after approval of the Authority and the Court, through an interim taxation of costs, if necessary.<sup>6</sup>

15. 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. Jeanne Bryant, and Ms. Jere Cowan, performed work for this Receivership for the period of January 1, 2017 through January 31, 2017 in the amount of \$1432.02.<sup>7</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 January 1, 2017 through January 31, 2017 in the amount of \$2235.57. 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 January 1, 2017 through January 31, 2017 in the amount of \$4752.00.

16. The Authority 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 Authority. *See* Affidavit of Kelly Cashman-Grams, General Counsel for the Tennessee Regulatory Authority, 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.

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

<sup>7</sup> This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of January 1, 2017 through January 31, 2017, which total \$266.17.

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

- a. Invoices for Robert E. Moore, Jr. and others at the Receiver for January of 2017: \$1432.02; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for January of 2017: \$2235.57; and,
- c. Invoice for Mr. Matherne working under Mr. Moore for January of 2017: \$4752.00.

18. 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 \$8419.59, 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 \$3667.59 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Authority on an interim basis in the amount of \$4752.00 (constituting the amount of Mr. Matherne's fees and expenses).

**DATED:** February 27, 2017.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: Robert E. Moore, Jr.  
Robert E. Moore, Jr. (BPR#018600)  
Chief Operations Officer  
Receivership Management Inc.  
1101 Kermit Drive, Suite 735  
Nashville, Tennessee 37217  
615-370-0051 (Phone)  
615-373-4336 (Facsimile)  
rmoore@receivermgmt.com (Email)  
*Court Appointed Receiver for  
Laurel Hills Water System*

*by Receiver  
Granted by P.C.  
on 2/24/2017*

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)

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 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

Scott D. Hall, Esq.  
Counsel for Moy Toy, LLC  
105 Bruce Street  
Sevierville, Tennessee 37862

Jonathan R. Hamby, Esq.  
Looney, Looney & Chadwell  
156 Rector Avenue  
Crossville, Tennessee 38555

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 27<sup>th</sup> day of February, 2017.

  
\_\_\_\_\_  
G. Everett Sinor, Jr.

# Receivership Management, Inc.

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1101 Kermit Drive, Suite 735 Nashville, Tennessee 37217 (615) 370-0051 Fax (615) 373-4336

## **FIRST NOTICE REGARDING UNPAID WATER BILL**

*Name*

*Address*

*City, State, ZIP*

Re: Unpaid Water Bill  
Service Address: \_\_\_\_\_

Dear *Name*:

Receivership Management, Inc. is the receiver operating the Laurel Hills Water System, as appointed by the Chancery Court of Cumberland County, Tennessee.

Effective July 1, 2016, the Chancery Court of Cumberland County, which supervises this water system authorized a monthly water service rate of \$114.24. **We are notifying you that your account for water service from Laurel Hills Water System is seriously past due. Your current past due balance is \$\_\_\_\_\_.**

Unless the entire balance is paid by **March 30, 2017**, your water service will be terminated. Your water service will not be reactivated until the entire past due balance is paid in full. As Renegade Mountain is a resort community, all properties tapped into the water system are required to make monthly payments for water service regardless of usage. **Although your water service will be terminated, your obligation to make monthly payments remains in full force and effect so long as your property is developed and has access to the water system.**

You may pay your bill by mailing your check to:

Laurel Hills Water System  
Post Office Box 25  
Crossville, Tennessee 38557

You may also pay in person at:

Lansford & Stephens CPA  
92 Rockwood Ave  
Crossville, Tennessee 38555

Questions regarding this notice may be directed to Robert E. Moore, Jr. at 615-370-0051.



2:04 PM

02/24/17

### Laurel Hills Water System In Receivership A/R Aging Summary As of February 24, 2017

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	496.20	838.92
BRASSELL, CRYSTAL	0.00	0.24	0.00	0.00	0.00	0.24
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	2,627.52	12,680.64	20,791.68
DOUGLAS, JIMMY & JACKIE	0.00	114.24	0.00	0.00	0.00	114.24
ELLIS, ALVIN	0.00	114.24	0.00	0.00	0.00	114.24
HAISER, GARY & JEANNIE	0.00	114.24	0.00	0.00	0.00	114.24
HARDEMAN, GRETCHEN	0.00	114.24	114.24	114.24	0.00	342.72
HEIRS, LUKE & ANNA DUNN	0.00	114.24	0.00	0.00	0.00	114.24
HENMAN, MIKE	0.00	0.00	0.00	0.04	0.00	0.04
JUDD, JONATHAN	0.00	114.24	114.24	0.00	0.00	228.48
LATHAM, KENT	0.00	114.24	114.24	114.24	342.72	685.44
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	114.24	114.24	456.96
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	114.24	456.96
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	114.24	456.96
LOUD, PAUL F.	0.00	114.24	0.00	0.00	0.00	114.24
MCQUEEN, DARRELL E	0.00	114.24	114.24	114.24	0.00	342.72
MILLER, DAVID	0.00	114.24	114.24	114.24	0.00	342.72
NEALE, MIKE	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (1)	0.00	89.24	0.00	0.00	0.00	89.24
RIFNER, DAVE	0.00	114.24	114.24	114.24	114.24	456.96
ROBINSON, CARL	0.00	114.24	0.00	0.00	0.00	114.24
SANDLIN, DONALD & BRENDA	0.00	114.24	0.00	0.00	0.00	114.24
<b>TOTAL</b>	<b>0.00</b>	<b>5,001.80</b>	<b>3,884.16</b>	<b>3,655.72</b>	<b>13,976.52</b>	<b>26,518.20</b>

EXHIBIT  
B



LAUREL HILLS WATER DISTRICT  
 SCHEDULE OF RECEIPTS, DISBURSEMENTS AND NET ASSETS  
 (WATER OPERATIONS ONLY)

	FOR THE PERIOD		
	10/26/2015 12/31/2016	1/1/2017 1/31/2017	10/26/2015 1/31/2017
<b>RECEIPTS</b>			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	108,112.06	10,739.07	118,851.13
<b>TOTAL REVENUE</b>	<b>108,112.06</b>	<b>10,739.07</b>	<b>118,851.13</b>
<b>DISBURSEMENTS</b>			
<b>FEEES</b>			
5695-ACCOUNTING FEES	3,200.00	-	3,200.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
<b>TOTAL FEES</b>	<b>5,594.56</b>	<b>-</b>	<b>5,594.56</b>
<b>OTHER EXPENSES:</b>			
5697-OTHER FEES	3,100.00	750.00	3,850.00
5930-TAXES	1,692.26	-	1,692.26
6060-RENT	-	-	-
6190-EQUIPMENT MAINTENANCE	349.78	-	349.78
6215-COPIES POSTAGE & SHIPPING	130.00	-	130.00
6220-TELEPHONE & INTERNET	-	-	-
6230-OFFICE SUPPLIES	45.58	-	45.58
6250-PRINTING	-	-	-
6260-STORAGE	-	-	-
6270-MOVING EXPENSE	-	-	-
6290-UTILITIES	55,041.66	-	55,041.66
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE	13,955.97	1,270.03	15,226.00
6350-TRAVEL	-	-	-
<b>TOTAL OTHER EXPENSES</b>	<b>74,934.53</b>	<b>2,020.03</b>	<b>76,954.56</b>
<b>TOTAL EXPENSES</b>	<b>80,529.09</b>	<b>2,020.03</b>	<b>82,549.12</b>
<b>NET RECEIPTS LESS DISBURSEMENTS</b>	<b>27,582.97</b>	<b>8,719.04</b>	<b>36,302.01</b>
<b>SCHEDULE OF CHANGE IN NET ASSETS</b>			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	27,582.97	8,719.04	36,302.01
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
<b>NET ASSETS</b>	<b>27,682.97</b>		<b>36,402.01</b>

2/16/2017 14:18

TOTAL ASSETS	3,850.80	12,569.84
TOTAL LIABILITIES	23,832.17	23,832.17
<b>NET ASSETS</b>	<b>27,682.97</b>	<b>36,402.01</b>

NOTE : FIGURES DO NOT INCLUDE ACCOUNT PAYABLE OWED/DUE TO TRA FOR RECEIVERSHIP FEE, OTHER CONTRACT LABOR, AND LEGAL FEES.

\*NOTE: OCT 2016-NO UTILITIES OR INSURANCE EXP DUE TO PAYMENTS MADE AND RECORDED



LAUREL HILLS WATER DISTRICT  
REGIONS BANK ACCOUNT 232618611

1/31/2016

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	9,900.61	8,618.58
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(1,270.03)	
	<u>8,618.58</u>	<u>8,618.58</u>

16-Feb-17  
01:07 PM

-

OUTSTANDING CHECKS

1071 1,270.03

1,270.03

2015 TAX PYMT  
2016 TAX PYMT

1,624.00  
1,230.00





**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**  
 December 31, 2016 through January 31, 2017

**SUMMARY**

<b>Beginning Balance</b>	<b>\$27,047.90</b>		Minimum Balance	\$4,548
Deposits & Credits	\$10,739.07	+	Average Balance	\$13,356
Withdrawals	\$0.00	-		
Fees	\$0.00	-		
Automatic Transfers	\$0.00	+		
Checks	\$27,886.36	-		
<b>Ending Balance</b>	<b>\$9,900.61</b>			

**DEPOSITS & CREDITS**

01/03	Deposit - Thank You	685.95
01/13	Deposit - Thank You	8,682.24
01/24	Deposit - Thank You	1,370.88
<b>Total Deposits &amp; Credits</b>		<b>\$10,739.07</b>

**CHECKS**

<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
01/03	1066	614.45	01/30	1070 *	750.00
01/04	1067	1,270.09	01/31	1072 *	3,951.26
01/05	1068	21,300.56			
<b>Total Checks</b>					<b>\$27,886.36</b>

\* Break In Check Number Sequence.

**DAILY BALANCE SUMMARY**

<u>Date</u>	<u>Balance</u>	<u>Date</u>	<u>Balance</u>	<u>Date</u>	<u>Balance</u>
01/03	27,119.40	01/13	13,230.99	01/31	9,900.61
01/04	25,849.31	01/24	14,601.87		
01/05	4,548.75	01/30	13,851.87		

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

**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

	053
Cycle	26
Enclosures	0
Page	2 of 2

**For all your banking needs, please call 1-800-REGIONS (734-4667)  
or visit us on the Internet at [www.regions.com](http://www.regions.com) (TTY/TDD 1-800-374-6791).**

**Thank You For Banking With Regions!**





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

Jeanne Barnes Bryant

January 2017 Fees	\$119.20
January 2017 Overhead Expense	\$11.20

Receivership Management, Inc.

January 2017 Fees	\$1,046.65
January 2017 Overhead Expense	\$210.00
January 2017 Expenses	\$44.97

Everett Sinor

January 2017 Fees & Expenses	<u>\$2,235.57</u>
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<b>Proposed Payment out of Receivership Estate</b>	<b>\$3,667.59</b>
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Graham Matherne

January 2017 Fees & Expenses	<u>\$4,752.00</u>
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<b>Proposed Interim Taxation of Costs</b>	<b>\$4,752.00</b>
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Receivership Management, Inc.  
P. O. Box 2307  
Brentwood, TN 37024

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT				January 2017
1/17/2017	Jeanne Barnes Bryant	DISCUSSION WITH ROB MOORE RE PIPE ISSUES	0.1	\$163.00
1/24/2017	Jeanne Barnes Bryant	EMAIL FROM SINOR RE CUTOFFS	0.1	\$163.00
1/27/2017	Jeanne Barnes Bryant	REVIEW REPORT, EMAILS FROM COUNSEL RESPONSE RE SAME	0.3	\$163.00
1/30/2017	Jeanne Barnes Bryant	EMAIL RE ORDER ON NOVEMBER REPORT, QUESTION RE CHECK	0.2	\$163.00
1/31/2017	Jeanne Barnes Bryant	QUESTION RE CHECK	0.1	\$163.00
<b>Total</b>				<b>\$130.40</b>

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		January 2017
1/2/2017	Anna M. Hunter	PHONE CALLS WITH CRAB ORCHARD UTILITY COMP AND VEC REGARDING OUTSTANDING BILLS 1.5 \$50.00 \$75.00
1/3/2017	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT. 0.3 \$50.00 \$15.00
1/3/2017	Cody Smith	POST DEPOSIT WITH FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. 0.3 \$123.00 \$36.90
1/4/2017	Anna M. Hunter	CREATE DATABASE FOR 1099 FILING 0.1 \$50.00 \$5.00
1/4/2017	Cody Smith	PREPARE F1099 DB FOR INPUT FILE TO 1099 PROGRAM FOR TY 2016. 0.4 \$123.00 \$49.20
1/4/2017	Robert E. Moore, Jr.	EMAIL UPDATE FROM E.SINOR ON NUMEROUS ISSUES .10 0.1 \$153.00 \$15.30
1/5/2017	Anna M. Hunter	RECORD DECEMBER FEES AND EXPENSES. UPDATE DATABASE FOR 1099-MISC. 0.4 \$50.00 \$20.00
1/5/2017	Cody Smith	UPDATE 1099 SOFTWARE AND RUN TEXT FILE FOR 1099 MISC. INPUT FILES. 0.2 \$123.00 \$24.60
1/9/2017	Anna M. Hunter	RECORD FEE AND EXPENSES. 0.2 \$50.00 \$10.00
1/9/2017	Anna M. Hunter	UPDATE ACCOUNTS RECEIVABLE DATABASE. UPDATE 1099 DATABASE FOR TAX FILINGS. RECORD FEES & EXPENSES. 0.35 \$50.00 \$17.50
1/10/2017	Cody Smith	PREPARE F1099 DB FOR INPUT FILE TO 1099 PROGRAM FOR TY 2016. 0.2 \$123.00 \$24.60
1/11/2017	Anna M. Hunter	UPDATE DEC 2016 NET ASSETS AND CASH FLOW PROJECTION. BANK RECON AS OF 1/11/17 1 \$50.00 \$50.00

**LAUREL HILLS WATER DISTRICT**

**January 2017**

Date	Name	Description	Hours	Amount
1/11/2017	Cody Smith	UPDATE REGISTERS AND RECONCILE REVENUE AND EXPENSE ACCOUNT THROUGH CURRENT PERIOD. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION IN PREPARATION FOR UPDATE OF NET ASSETS & CASH FLOW PROJECTION.	1.6	\$123.00
				\$196.80
1/12/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.3	\$123.00
1/12/2017	Jere P. Cowan	RECEIPT FUNDS FROM TRA; POST AND UPDATE FINANCIAL ACCOUNTS RE: SAME; EMAIL J. BRYANT AND R. MOORE RE: SAME	0.4	\$50.00
1/13/2017	Robert E. Moore, Jr.	RESPOND TO EMAIL FROM E. SINOR RE: DELINQUENT CUSTOMERS, APPROVE DRAFT NOTICE 2	0.2	\$153.00
1/16/2017	Cody Smith	UPDATE REGISTER AND POST FEE AND EXPENSE ACCRUALS FOR CONTRACT LABOR THROUGH DECEMBER.	0.3	\$123.00
1/16/2017	Robert E. Moore, Jr.	REVIEW LETTER FROM MR. AND MRS. LOUD. FORWARD SAME TO E.SINOR TO PREPARE RESPONSE, ADDITIONAL EMAIL FROM E.SINOR RE: SERVICE ISSUES AND FREEZING TEMPERATURES, APPROVE CORRESPONDENCE .10	0.1	\$153.00
				\$15.30
1/17/2017	Robert E. Moore, Jr.	REVIEW DRAFT RESPONSE LETTER TO LOUD, MAKE MINOR SUGGESTION AND APPROVE .10	0.1	\$153.00
1/18/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.2	\$123.00
1/19/2017	Anna M. Hunter	UPDATE NET ASSETS AND CASHFLOW THROUGH DEC 2016.	1	\$50.00
1/19/2017	Cody Smith	CALL VENDERS AND CONTRACT LABOR RE SSN/EIN NUMBER AND ADDRESS FOR ISSUANCE OF 1099.	1.2	\$123.00
				\$147.60
1/19/2017	Jere P. Cowan	RECEIPT INVOICE FOR PROCESSING AND PAYMENT; PREPARE PAYMENT OF SAME; FORWARD	0.4	\$50.00
1/23/2017	Anna M. Hunter	PROCESS F1099 & 945 IRS FILINGS.	0.3	\$50.00
1/23/2017	Cody Smith	IMPORT 1099-MISC FILE TO PROGRAM THEN PRINT/MAIL FORMS. FILE BACK UP DOCUMENTATION FOR RECORDS. CREATE FILE FORMAT FOR IRS FIRE ELECTRONIC SUBMISSIONS.	0.6	\$123.00
				\$73.80
1/25/2017	Robert E. Moore, Jr.	RESPOND TO ISLER DEMOLITION EMAIL RE: POSSIBLE PURCHASE OF WATER TOWER FOR SCRAPE-CASH TO RECEIVERSHIP .10	0.1	\$153.00
				\$15.30

**LAUREL HILLS WATER DISTRICT**

**January 2017**

Date	Name	Description	Hours	Rate	Total
1/26/2017	Jere P. Cowan	RECEIPT UTILITIES INVOICE FOR PROCESSING; PREPARE PAYMENT OF SAME; FORWARD	0.4	\$50.00	\$20.00
1/26/2017	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: DELINQUENCY NOTICE FORMAT, COURT APPROVAL OF SAME .25	0.25	\$153.00	\$38.25
1/27/2017	Jere P. Cowan	PREPARE R. MOORE AFFIDAVIT FOR FILING; EMAILS WITH E. SINOR AND CONFERENCE WITH R. MOORE RE: SAME; FORWARD EXECUTED AFFIDAVIT TO SINOR	0.5	\$50.00	\$25.00
1/30/2017	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT.	0.3	\$50.00	\$15.00
1/30/2017	Cody Smith	ELECTRONICKY FILE 1096 FROM ISSUANCE OF 1099MISC FOR TY 2016.	0.3	\$123.00	\$36.90
1/30/2017	Jere P. Cowan	RECEIPT PAYMENT IN ACCORDANCE WITH COURT ORDER; UPDATE FINANCIAL ACCOUNTS POSTING SAME; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNT; PROCESS PAYMENTS	0.8	\$50.00	\$40.00
1/30/2017	Robert E. Moore, Jr.	FOLLOW UP ON TWO INVOICES FROM G. WILLIAMS WITH C. SMITH .10	0.1	\$153.00	\$15.30
1/31/2017	Jere P. Cowan	PROCESS INVOICES FOR PROCESSING AND PAYMENT; PREPARE PAYMENTS; FORWARD SAME	0.5	\$50.00	\$25.00

**Total** **\$1,256.65**

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

February 1, 2017

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

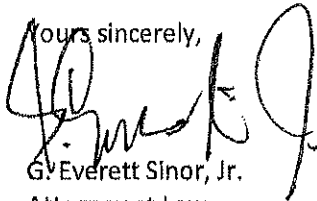
*RE: January 2017 Billings – RMI/Laurel Hills Water System in Receivership*

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

Please find enclosed herewith my billings for the previous month on the matter referenced above. If you have any questions about this bill, please do not hesitate to contact me.

Yours sincerely,



G. Everett Sinor, Jr.  
Attorney at Law

Enclosure

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

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
1/3/2017	Email from S Hall re different LHWS matters; email to G Matherne & R Moore re same; preparation of order to Chancellor Thurman; email response to S Hall; T.C. w R Moore re same;; T.C w G Matherne re Turnbull letter; review of A Hunter email w COUD invoices; email to S Hall re request for information	1.3		
1/4/2017	Review notices prepared by R Moore; T.C. w G Williams re numerous matters; email to R Moore re same; T.C. w E Lawless @ TRA re affidavit; email from S Hall re request for LHWS information; email to RMI re: same	0.8		
1/5/2017	Email from Heather @ Lansford & Stephens re Eagles' Nest; review of deposit; email to C Smith re same; review of S Hall email regarding request for information; email to G Williams re water quality reports; T.C. w E Bolin @ COUD re numerous LHWS issues	0.7		
1/6/2017	Review of email from G Williams re various LHWS matters, including weather, notices and water quality reports; email from C Turner with Cumberland County C&M office w order modifying global mediation order; email to D Kendall re: cut off of water on mountain; email response to G Williams; email to W Harkleroad re proper address for notices from Lansford & Stephens; T.C. w R Moore re LHWS matters; email from W Harkleroad re new address & response; email from D Kendall on weather; email to Lansford & Stephens w Eagle's Nest new address	0.5		
1/9/2017	Review of G Williams email on water service & quality report; T.C. w Judge Turnbull; email re pre-mediation conference call; review emails on best time for conf. call; review S Hall & J Gass emails; email to G Matherne re same	0.3		
1/10/2017	review of CCR water quality report; email to G Williams re same; voicemail for E Lawless; T.C. w E Lawless re affidavit; review of chronic non-payers; T.C. w Heather @ Lansford & Stephens re A/R report; email to G. Williams & Heather re same; email to K Cashman-Grams	0.9		
1/11/2017	email from G Williams w MicroBac water quality reports; email to S Hall re same; T.C. w G Matherne re LHWS; conf. call w Judge Turnbull & all parties re mediation; T.C. w R Moore re LHWS matters & conf. call	1.0		



	11th report work completion and transmission; T.C. (2) w A Conklin re water regs, mediation call & conveyance docs; V.M. & T.C. w G Matherne re same; email to A Conklin re same; T.C. w K Cashman-Grams re LHWS matters; email from K Cashman-Grams and forward same to G Matherne; email from C Smith re G Williams invoice; email to G Williams re same	1.8
1/12/2017		
	G. Williams email on invoice; email to C Smith re same; email from Lansford & Stephens re letter form customers; composition of letter to customer (Gamble); email to R Moore re same; email fro C Turner on 11th report; response to same; forward 11th report to interested persons; composition of Miller letter	1.4
1/13/2017		
1/16/2017	email from J Moore re 11th report & response	0.1
	Finalize Miller letter; R Moore email re same; review Loud letter; R Moore email from Loud reviewed; response to R Moore; T.C. w G Williams re Loud property and leak; email to R Moore re same; discussion w R Moore re same; T.C. w G Matherne re same; Draft of Loud letter; review R Moore email re same; text to G Williams re a revision;	2.9
1/17/2017		
1/18/2017	Completion of Loud letter	0.1
	Review A Hunter email w Dec 2016 fees and expenses & other docs; review G Matherne bill; review G Matherne email; email to A Hunter & C Smith re outstanding checks; email to Lansford & Stephens requesting A/R summary for Jan 2017	0.3
1/19/2017		
1/20/2017	review of G Matherne email on easements	0.1
1/23/2017	review of G Matherne & R Schwerer colloquy, and comment by email; review D Kendall email re easements	0.1
1/24/2017	Review A. Conklin email on warranty deed; review Heather's email with A/R list; review delinquency notice email from R Moore; review G Matherne email re water tower property; review R Moore email re tower demolition	0.6
1/25/2017	review G. Matherne email to S Hall & D Kendall re warranty deed; review C Turner (Cumberland County C&M office) email on docket; T.C. w R Moore re LHWS matters, including A/R list	0.7
1/26/2017	G. Matherne email; on dates and response from S Hall; review R Moore emila on dates available; review G Matherne email on water tank property; review G Matherne email to D Kendall; initial 12th report work	0.3
1/27/2017	Preparation and completion of 12th report draft; transmit same to J Bryant & R Moore for review and approval; T.C. w R Moore re 12th report; report sent to K Cashman-Grams via email	1.6
1/29/2017	Review of D Kendall email re water tower	0.1

1/30/2017	T.C. w C Smith re G Williams bill; email to G Williams re same; K Cashman-Grams email & E Lawless email on signed affidavit; email from C Turner re new expenses; forward same	<u>0.1</u>		
	<b>Hourly Billing Total</b>	<b>15.7</b>	<b>\$140.00</b>	<b>\$2,198.00</b>
		<u>Miles</u>	<u>Rate</u>	
	<b>Mileage Total</b>	<b>0.0</b>	<b>\$0.47</b>	<b>\$0.00</b>
1/12/2017	Postage for 11th Report	\$37.57		
	<b>Other Expenses Reimburseable Total</b>			<b><u>\$37.57</u></b>
	<b>Balance Owed this month</b>			<b>\$2,235.57</b>
	Previous Balance Owed		\$10,382.75	
	<b>Total Amount Due and Payable</b>			<b>\$12,618.32</b>

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

The UPS Store - #3355  
115 Penn Warren Drive  
Suite 300  
Brentwood, TN 37027  
(615) 377-8100

01/12/17 12:00 PM

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001	008237 (022)	TO \$ 24.12
	First Class Package	
	Tracking# MMWJNUUT58ZON	
002	008237 (022)	TO \$ 1.57
	First Class Package	
	Tracking# MMWJNUUSUJBWH	
003	001040 (001)	TO \$ 11.88
	Ground Commercial	
	Tracking# 1Z303Y3Y0302695857	

SubTotal \$ 37.57  
Total \$ 37.57

Master Card \$ 37.57  
ACCOUNT NUMBER \* \*\*\*\*\*3631  
Appr Code: (S) Sale

Receipt ID 82997748326452888969 003 Items  
CSH: David Tran: 8792 Reg: 002

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*11th report postage  
LHWS*

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

FEBRUARY 8, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1029788

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 JANUARY 31, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$4,752.00
TOTAL THIS INVOICE	\$4,752.00
PREVIOUSLY BILLED AND OUTSTANDING	\$27,510.33
TOTAL AMOUNT DUE	\$32,262.33

=====

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

FEBRUARY 8, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1029788

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 JANUARY 31, 2017

01/03/17	E-MAILS FROM SCOTT HALL REGARDING MEDIATION ISSUES AND JOHN MOORE ISSUES (.10); E-MAIL FROM SINOR REGARDING ORDER MODIFYING TIMING OF MEDIATION (.10); REVIEW SINOR RESPONSE TO HALL E-MAIL (.10); TELEPHONE CONFERENCE WITH SINOR REGARDING BRIEFING AND RELATED MATTERS AS TO MEDIATION (.20).	J. GRAHAM MATHERNE	.50 hours at 270.00 per hour.	135.00
01/05/17	REVIEW DRAFTS OF EASEMENTS AND DEEDS; OUTLINE ISSUES TO ADDRESS.	J. GRAHAM MATHERNE	.40 hours at 270.00 per hour.	108.00
01/09/17	E-MAILS WITH COUNSEL GROUP REGARDING MEDIATION AND LOGISTICS (.30); FURTHER WORK REGARDING MEDIATION ISSUES (.50).	J. GRAHAM MATHERNE	.80 hours at 270.00 per hour.	216.00
01/10/17	REVIEW MATERIAL TO PREPARE FOR TELEPHONE CONFERENCE WITH JUDGE TURNBULL.	J. GRAHAM MATHERNE	.60 hours at 270.00 per hour.	162.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
MATTER NUMBER: 008264.000036  
INVOICE NO.: 1029788

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01/11/17 PREPARATION FOR CONFERENCE CALL WITH JUDGE  
TURNBULL (.30); TELEPHONE CONFERENCE WITH  
COUNSEL AND JUDGE TURNBULL (.60); REVIEW WORK  
ON DRAFT EASEMENTS AND DEEDS (.40).  
J. GRAHAM MATHERNE 1.30 hours at 270.00 per hour. 351.00

01/12/17 REVIEW RECEIVER 11TH REPORT (.40); TELEPHONE  
CONFERENCE WITH SINOR REGARDING DRAFT  
EASEMENTS/DEEDS (.10); E-MAIL FROM SINOR  
REGARDING 2013 APPRAISAL OF WATER TOWER  
PROPERTY (.10); REVIEW OF SAME (.50).  
J. GRAHAM MATHERNE 1.10 hours at 270.00 per hour. 297.00

01/17/17 LENGTHY TELEPHONE CONFERENCE WITH SINOR  
REGARDING CUSTOMER COMPLAINT REGARDING REPAIR  
WORK (1.00); REVIEW RECORDS REGARDING LOUD  
PROPERTY EASEMENT ISSUES (.40); FURTHER E-MAILS  
WITH SINOR REGARDING SAME (.20); REVIEW OF FILE  
REGARDING EASEMENT/DEEDS AND REGARDING  
CUMBERLAND POINTE (.40).  
J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

01/18/17 REVISIONS OF TERRA MOUNTAIN EASEMENT AND MOY  
TOY EASEMENT (.80); REVIEW OF COMMENTS FROM  
COUNSEL REGARDING SAME AND REVIEW OF FILE  
MATERIAL REGARDING SAME (.40); E-MAILS TO  
COUNSEL REGARDING SAME (.20); REVIEW OF  
MATERIAL IMPACTING UPON DEED ON WATER TOWER  
PROPERTY (.90); FURTHER DRAFTING REGARDING SAME  
(.60).  
J. GRAHAM MATHERNE 2.90 hours at 270.00 per hour. 783.00

01/19/17 REVIEW E-MAILS REGARDING MOY TOY/TERRA MOUNTAIN  
EASEMENT ON WATER SUPPLY LINE (.20); TELEPHONE  
CONFERENCE WITH COUNSEL REGARDING SAME (.30);  
FURTHER E-MAILS REGARDING DRAFT OF SAME (.20)  
DRAFTING AND FILE REVIEW REGARDING WATER TOWER  
PROPERTY DEED (.70).  
J. GRAHAM MATHERNE 1.40 hours at 270.00 per hour. 378.00

01/20/17 E-MAILS WITH D. KENDALL, SCOTT HALL, R.  
SCHWERER REGARDING WATER LINE EASEMENTS (.30);  
FURTHER DRAFTING AS TO WARRANTY DEED ON WATER  
TOWER PROPERTY (.60); E-MAIL TO COUNSEL  
REGARDING SAME (.20); FURTHER REVIEW OF  
MATERIALS REGARDING EASEMENTS ON SERVICE RIGHTS  
(.60).  
J. GRAHAM MATHERNE 1.70 hours at 270.00 per hour. 459.00

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
MATTER NUMBER: 008264.000036  
INVOICE NO.: 1029788

01/21/17 E-MAILS WITH SCHWERER REGARDING TERRA MOUNTAIN  
EASEMENT ISSUES (.30); E-MAIL WITH D. KENDALL  
REGARDING EASEMENTS (.10).  
J. GRAHAM MATHERNE .40 hours at 270.00 per hour. 108.00

01/23/17 E-MAILS WITH E. SINOR REGARDING WEEK-END  
E-MAILS WITH SCHWERER AND RELATED MATTERS  
(.20); CONTINUED WORK ON MEDIATION ISSUES  
(.80).  
J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour. 270.00

01/24/17 E-MAIL TO DART KENDALL REQUESTING REVIEW OF  
WATER TOWER PROPERTY DEED (.20); E-MAILS WITH  
COUNSEL AND WITH CLIENT REGARDING REVIEW OF  
SAME (.40); E-MAIL WITH R. MOORE REGARDING  
SCRAPING OF WATER TOWER (.10).  
J. GRAHAM MATHERNE .70 hours at 270.00 per hour. 189.00

01/25/17 E-MAILS WITH E. SINOR REGARDING DOCKET SOUNDING  
ON CHANCERY COURT CASE (.30); FINAL REVIEW OF  
DRAFT DEED ON WATER TOWER PROPERTY (.50);  
E-MAIL TO SCOTT HALL REGARDING SAME (.20);  
E-MAIL WITH R. MOORE AND E. SINOR REGARDING  
SAME (.10); E-MAIL WITH D. KENDALL (.10).  
J. GRAHAM MATHERNE 1.20 hours at 270.00 per hour. 324.00

01/26/17 E-MAIL FROM SCOTT HALL REGARDING WATER TOWER  
PROPERTY DEED (.20); REVIEW WATER TOWER  
PROPERTY ISSUES (.50); E-MAILS TO ALL COUNSEL  
REGARDING SAME (.30); E-MAILS WITH SINOR  
REGARDING DOCKET SOUNDING (.20); TELEPHONE  
CONFERENCE WITH COUNSEL REGARDING HALL'S E-MAIL  
(.30); E-MAIL TO D. KENDALL REGARDING SAME  
(.10).  
J. GRAHAM MATHERNE 1.60 hours at 270.00 per hour. 432.00

TOTAL SERVICES	17.60	\$4,752.00
TOTAL THIS INVOICE		\$4,752.00
PREVIOUSLY BILLED AND OUTSTANDING		\$27,510.33
TOTAL AMOUNT DUE		\$32,262.33

Feb 8, 2017  
PAGE 5

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
MATTER NUMBER: 008264.000036  
INVOICE NO.: 1029788

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*-----TIME AND FEE SUMMARY-----*			
*-----TIMEKEEPER-----*	RATE	HOURS	FEE
J MATHERNE            PARTNER	270.00	17.60	4752.00



RMI EXP RECOVERABLE LHWD  
1/1/17 Through 1/31/17

Category Description	1/1/17- 1/31/17	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-119.20	-119.20
5610-CONTRACT LABOR RMI	-1,046.65	-1,046.65
5690-RMI OH EXPENSE	-221.20	-221.20
TOTAL 5100 FEES RMI	-1,387.05	-1,387.05
5150 FEES LEGAL		
5400-LEGAL FEES	-6,987.57	-6,987.57
TOTAL 5150 FEES LEGAL	-6,987.57	-6,987.57
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-5.30	-5.30
6210-POSTAGE	-4.21	-4.21
TOTAL 5300 EXPENSES	-44.97	-44.97
OVERALL TOTAL	-8,419.59	-8,419.59

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

TENNESSEE REGULATORY AUTHORITY

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 Regulatory Authority in this matter. Pursuant to Tennessee law, the Tennessee Regulatory Authority took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.

EXHIBIT  
E

3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of January 1, 2017 through January 31, 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.

7. I believe that all fees and expenses contained in this filing and presented for approval are fair, reasonable and proper for the necessary services provided.

*[intentionally blank]*

8. 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 in the amount of all such fees and expenses save Mr. Matherne's fees and expenses; and (b) order payment of Mr. Matherne's fees and expenses as an interim taxation of costs in this matter.

**FURTHER THE AFFIANT SAITH NOT.**

Kelly Cashman Grams  
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

27 day of February, 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 REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

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AFFIDAVIT OF ROBERT E. MOORE, JR.

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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 and the Tennessee Regulatory Authority. In that capacity, I have reviewed and approved the administration of the Laurel Hills Water System ("LHWS") from the date of the Order Appointing Receiver entered by this Court on October 26, 2015.

3. The Receiver has filed a Motion for approval of fees and expenses in the LHWS Receivership. The Receiver's Motion seeks approval of the amount of fees and

EXHIBIT  
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expenses incurred for the period of time between January 1, 2017 and January 31, 2017 that are contained in the Receiver's motion.

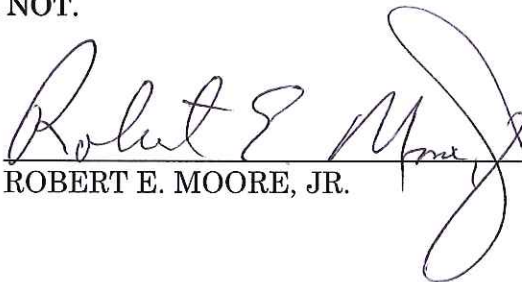
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide 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 \$3667.59 (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 \$4752.00 (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 February, 2017.

  
Notary Public  
Commission Expires: 1/6/2020





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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

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 \_\_\_\_\_, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for January 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 \$8419.59.

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



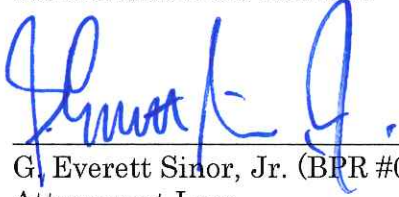
- (1) payment to the Receiver in the amount of \$3667.59 from the assets of the Laurel Hills Water System in Receivership is hereby **AUTHORIZED**; and,
- (2) **COSTS ARE TAXED** on an interim basis to the Plaintiff, the Tennessee Regulatory Authority, in the amount of \$4752.00.

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

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The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



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

Attorney at Law

Counsel for Receivership Management, Inc.

3504 Robin Road

Nashville, Tennessee 37204

615.969.9027

Everett.Sinor@gmail.com

Certificate of Service

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

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

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

Jonathan R. Hamby, Esq.  
Looney, Looney & Chadwell  
156 Rector Avenue  
Crossville, Tennessee 38555

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  
105 Bruce Street  
Sevierville, Tennessee 37862

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