

G. EVERETT SINOR, JR.
Attorney at Law

January 12, 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

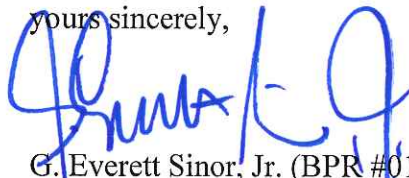
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Eleventh 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.

No. 2012-CH-560
Chancellor Thurman

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

Robert E. Moore, Jr., Attorney and Chief Operations Officer of Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed Receiver of the Laurel Hills water system [hereinafter the "LHWS"] previously controlled by Laurel Hills Condominiums Property Owners Association [hereinafter the "Laurel Hills Condominiums POA"], submits this, the Receiver's Eleventh 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, 2015.¹

2. The Receiver filed its first report with the Cumberland County Clerk and Master on December 12, 2015, in which it provided the Court with financial and operational information for the LHWS, summarized the Receiver's activities regarding the system, and detailed some of the legal issues involving control of the water system properties in question. The Receiver has filed subsequent reports with the Cumberland County Clerk and Master in which it has provided the Court with additional financial and operational information, summarized the Receiver's activities regarding the system, set forth its implementation of the Receivership Plan, and detailed some of the continuing legal issues involving control of the water system properties in question.²

Implementation 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 Tenth 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.

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.

¹ This order was amended on April 21, 2016, but Receivership Management, Inc. continues to be the court-appointed receiver for the Laurel Hills Water System. See Amended Order Appointing Receiver, at ¶ 2, p.1.

² See the Receiver's second, third, fourth, fifth, sixth, seventh, eighth, ninth, and tenth 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, and December 5, 2016, respectively.

5. 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. A copy of said petition was attached to the Receiver's Ninth Report as Exhibit B and reference is made to that exhibit. The petition was filed by the Receiver on Friday, November 18, 2016, in the Cumberland County Circuit Court. Complete implementation of the Receivership Plan via a sale of the LHWS to the Receiver's preferred bidder must await successful prosecution of the condemnation action, given the LHWS titling issues referenced above and Aqua Green's reservations.

6. On November 14, 2016 in Cookeville, this Honorable Court heard argument on the Authority's show cause motion, Moy Toy, LLC's ["hereinafter Moy Toy"] motion to intervene, and the Laurel Hills Condominiums POA's motion to enforce settlement agreement and dismiss show cause order. The Court also received a status update from the Receiver. At that hearing, this Honorable Court granted Moy Toy's motion to intervene and ordered the parties, including Moy Toy, to participate in a global mediation session. The Receiver and the parties to this lawsuit are currently working on getting that global mediation session organized, and the Receiver is engaged in preparation for the mediation. Terra Mountain Holdings, LLC has voluntarily agreed to participate in said global mediation session.

Operations and Other Activities of the Receiver

7. As previously reported, effective July 1, 2016, a new rate of \$114.24 per month was instituted for the LHWS. In December of 2016, 94 of the 131 customers of the LHWS have now paid their water bill. Of the 37 non-paying customers, 23 are in the Cumberland Pointe condominium units, and 14 are located elsewhere on Renegade Mountain. As to non-Cumberland Pointe condominium unit owners, an increasing number (now eleven (11)) have not paid their water bill for two (2) or more months.

8. No decision has yet been made by the Receiver as to whether to cut water off to the non-paying customers of the LHWS that are not residences within the Cumberland Pointe condominium units. As previously reported, the Receiver understands that the Cumberland Pointe Homeowners' Association has cut water off to non-paying customers within those condominium units.

9. Further as previously reported, Mr. Gerald Williams has indicated to the Receiver that he does not wish to continue to provide engineering/operational services for the LHWS any longer. The Receiver continues to search for a properly licensed operator to provide these services for the LHWS. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

Financial Information

10. As of December 21, 2016, there was an accounts receivable past due balance of \$20,991.23.³ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

11. On a cash basis, LHWS had a net gain in November 2016 of \$7857.49.⁴ See Exhibit B, attached hereto and incorporated herein by reference. As of November 30, 2016, LHWS had a balance of \$31,330.19 in its main operating account.⁵ See Collective Exhibit C, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in November of 2016.⁶

³ Of this amount, \$4289.55 is less than a month past due, and \$16,701.68 is more than a month past due. See Exhibit A.

⁴ This is a bit misleading, in that there were still significant accounts payable as of this date.

⁵ Id.

⁶ 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 \$21,561.45 (the amount taxed to the Authority to reflect Mr. Matherne's fees and expenses).

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 fees and expenses is closer to \$5500.00.

13. At its current pace, the Receiver continues to anticipate that the LHWS will run out of money this month.⁷ When this occurs, it will 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 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.⁸

15. As shown in Collective Exhibit D, 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

⁷ 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.

⁸ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

November 1, 2016 through November 30, 2016 in the amount of \$1318.59.⁹ 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 D for the period November 1, 2016 through November 30, 2016 in the amount of \$5649.39. 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 D for the period November 1, 2016 through November 30, 2016 in the amount of \$17,364.02.

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

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 November of 2016: \$1318.59; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for November of 2016: \$5649.39; and,
- c. Invoice for Mr. Matherne working under Mr. Moore for November of 2016: \$17,364.02.

⁹ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of November 1, 2016 through November 30, 2016, which total \$243.19.

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.

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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 \$24,332.00, 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 \$6967.98 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Authority on an interim basis in the amount of \$17,364.02 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: January 12, 2017.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: 
Robert E. Moore, Jr. (BPR#013600)
Chief Operations Officer
Receivership Management Inc.
1101 Kermit Drive, Suite 735
Nashville, Tennessee 37217
615-370-0051 (Phone)
615-373-4336 (Facsimile)
rmoore@receivermgmt.com (Email)
*Court Appointed Receiver for
Laurel Hills Water System*

*By Court Order
granted by permission
on 12/26/2016*


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:

James R. Layman, 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

Melanie Davis, Esq.
Kizer & Black
329 Cates Street
Maryville, Tennessee 37801

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 ^{12th} day of January, 2017.



G. Everett Sinor, Jr.

2:34 PM

12/21/16

Laurel Hills Water System In Receivership
A/R Aging Summary
As of December 21, 2016

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BENSON, CYNTHIA L	0.00	114.24	114.24	0.00	0.00	228.48
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	267.72	610.44
CECCHETT, DON & DIANNE	0.00	32.59	0.00	0.00	0.00	32.59
CHAMBERS, BARRY	0.00	114.24	0.00	0.00	0.00	114.24
CPCA (84)	0.00	2,627.52	2,399.04	2,741.76	7,539.84	15,308.16
ELLIS, ALVIN	0.00	114.24	0.00	0.00	0.00	114.24
HEIRS, LUKE & ANNA DUNN	0.00	114.24	114.24	114.24	408.92	751.64
HENMAN, MIKE	0.00	0.04	0.00	0.00	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	114.24	456.96
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	0.00	0.00	228.48
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	0.00	0.00	228.48
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	0.00	0.00	228.48
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	1,104.02	1,446.74
NEALE, MIKE	0.00	30.04	0.00	0.00	0.00	30.04
RIFNER, DAVE	0.00	114.24	114.24	0.00	0.00	228.48
ROBINSON, CARL	0.00	114.24	0.00	0.00	0.00	114.24
SCHWARTZ, ROBERT	0.00	0.00	0.00	0.00	298.30	298.30
TOTAL	0.00	4,289.55	3,655.68	3,312.96	9,733.04	20,991.23



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

	FOR THE PERIOD		
	10/26/2015 10/31/2016	11/1/2016 11/30/2016	10/26/2015 11/30/2016
RECEIPTS			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4010-WATER BILL RECEIPTS	85,613.85	11,531.17	97,145.02
TOTAL REVENUE	85,613.85	11,531.17	97,145.02
DISBURSEMENTS			
FEES			
5695-ACCOUNTING FEES	1,200.00	-	1,200.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
TOTAL FEES	3,594.56	-	3,594.56
OTHER EXPENSES:			
5697-OTHER FEES	100.00	-	100.00
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	31,993.15	1,133.50	33,126.65
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE	10,145.70	2,540.18	12,685.88
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	45,075.75	3,673.68	48,749.43
TOTAL EXPENSES	48,670.31	3,673.68	52,343.99
NET RECEIPTS LESS DISBURSEMENTS	36,943.54	7,857.49	44,801.03
SCHEDULE OF CHANGE IN NET ASSETS			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	36,943.54	7,857.49	44,801.03
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	37,043.54		44,901.03
12/19/2016 9:31			
TOTAL ASSETS	23,972.70		31,330.19
TOTAL LIABILITIES	13,070.84		13,570.84
NET ASSETS	37,043.54		44,901.03

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 ON NOV 1ST 2016.



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

11/30/2016

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	33,678.86	31,330.19
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(2,336.67)	
	<u>31,330.19</u>	<u>31,330.19</u>

19-Dec-16
09:06 AM

OUTSTANDING CHECKS

1060	500.00
1061	1,270.09
1062	566.58

2,336.67

2015 TAX PYMT	1,624.00
2016 TAX PYMT	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 1

LIFEGREEN BUSINESS CHECKING
 November 1, 2016 through November 30, 2016

SUMMARY

Beginning Balance	\$23,984.70		Minimum Balance	\$22,147
Deposits & Credits	\$11,531.17	+	Average Balance	\$24,834
Withdrawals	\$0.00	-		
Fees	\$0.00	-		
Automatic Transfers	\$0.00	+		
Checks	\$1,837.01	-		
Ending Balance	\$33,678.86			

DEPOSITS & CREDITS

11/15	Deposit - Thank You	3,191.13
11/29	Deposit - Thank You	1,142.92
11/29	Deposit - Thank You	7,197.12
Total Deposits & Credits		\$11,531.17

CHECKS

<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
11/08	1058	1,270.09	11/08	1059	566.92
				Total Checks	\$1,837.01

* 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>
11/08	22,147.69	11/15	25,338.82	11/29	33,678.86

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

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Thank You For Banking With Regions!

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

Jeanne Barnes Bryant

November 2016 Fees	\$163.90
November 2016 Overhead Expense	\$15.10

Receivership Management, Inc.

November 2016 Fees	\$911.50
November 2016 Overhead Expense	\$154.30
November 2016 Expenses	\$73.79

Everett Sinor

November 2016 Fees & Expenses	<u>\$5,649.39</u>
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Proposed Payment out of Receivership Estate **\$6,967.98**

Graham Matherne

November 2016 Fees & Expenses	<u>\$17,364.02</u>
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Proposed Interim Taxation of Costs **\$17,364.02**



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		November 2016	
11/4/2016	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT FOR COURT, REVIEW SAME, RESPONSE TO COUNSEL	0.2 \$163.00 \$32.60
11/7/2016	Jeanne Barnes Bryant	EMAIL FROM ROB MOORE AND COUNSEL RE REPORT	0.1 \$163.00 \$16.30
11/8/2016	Jeanne Barnes Bryant	EMAIL RE INVOICE, REVIEW SAME	0.2 \$163.00 \$32.60
11/14/2016	Jeanne Barnes Bryant	DISCUSSION WITH ROB MOORE RE HEARING AND MEDIATION ORDER	0.2 \$163.00 \$32.60
11/15/2016	Jeanne Barnes Bryant	UPDATE FROM ROB MOORE RE MEDIATION	0.1 \$163.00 \$16.30
11/23/2016	Jeanne Barnes Bryant	EMAIL RE REPORT, QUESTION RE PAYMENTS	0.2 \$163.00 \$32.60
11/30/2016	Jeanne Barnes Bryant	EMAIL RE MOTION FILING	0.1 \$163.00 \$16.30
Total			\$179.30

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **November 2016**

Date	Service Provider	Description of Service	Hours	Rate	Total
11/1/2016	Anna M. Hunter	UPDATE NET ASSETS AS OF 10/31/2016, UPDATE REGISTER AND RECONCILE BANK ACCOUNT AS OF 10/31/2016	0.6	\$50.00	\$30.00
11/1/2016	Jere P. Cowan	RECEIPT INVOICES FOR PROCESSING; POST AND UPDATE FINANCIAL ACCOUNTS; PROCESS PAYMENTS FOR SAME	0.4	\$50.00	\$20.00
11/2/2016	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 10-31-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 10-31-16.	0.5	\$123.00	\$61.50
11/3/2016	Anna M. Hunter	RECORD FEES AND EXPENSED FOR OCTOBER 2016	0.2	\$50.00	\$10.00
11/3/2016	Robert E. Moore, Jr.	CALL WITH E.SINOR AND G.MATHERNE RE: PREPARATION OF CONTEMPT ACTION, ANTICIPATED TRAVELS TO CROSSVILLE, ADDITIONAL POTENTIAL PARTIES .5	0.5	\$153.00	\$76.50
11/4/2016	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.3	\$123.00	\$36.90
11/7/2016	Cody Smith	PREPARING EXHIBITS FOR COURT REPORTS. POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION.	0.2	\$123.00	\$24.60
11/7/2016	Jere P. Cowan	RECEIPT RESPONSE IN OPPOSITION AND IN SUPPORT OF SHOW CAUSE; CONFERENCE WITH R. MOORE RE: SAME; EMAIL TO WITH E. SINOR RE: SAME AND REPORT FILINGS FOR COURT.	0.3	\$50.00	\$15.00
11/7/2016	Robert E. Moore, Jr.	EMAIL FROM M.MCCLUNG RE: COMPLAINTS ON DRIVEWAY REPAIR, FORWARD SAME TO G.WILLIAMS TO INSPECT AND ADDRESS, UPDATE E.SINOR .10; REVIEW AND SIGN NINTH REPORT .2	0.3	\$153.00	\$45.90

LAUREL HILLS WATER DISTRICT

November 2016

Date	Employee	Description	Hours	Rate	Total
11/8/2016	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.2	\$123.00	\$24.60
11/8/2016	Jere P. Cowan	EMAILS WITH E. SINOR RE: TRA AND R. MOORE AFFIDAVITS	0.2	\$50.00	\$10.00
11/8/2016	Robert E. Moore, Jr.	REVIEW CONTEMPT ACTION REVISED DRAFT, ISSUE QUESTIONS ON CLARIFICATIONS NEEDED .25	0.25	\$153.00	\$38.25
11/9/2016	Jere P. Cowan	EMAIL FROM E. SINOR SENDING FINALIZED STATUS REPORT	0.2	\$50.00	\$10.00
11/9/2016	Jere P. Cowan	TRAVEL TO TRA OFFICE RE: K. GRAM AFFIDAVIT; EMAIL WITH E. SINOR RE: SAME;	1.2	\$50.00	\$60.00
11/9/2016	Robert E. Moore, Jr.	REVIEW AND APPROVE REVISED DRAFT CONDEMNATION ACTION .10	0.1	\$153.00	\$15.30
11/15/2016	Robert E. Moore, Jr.	UPDATE CALL FROM E.SINOR AND G.MATHERNE RE: HEARING AND GLOBAL MEDIATION, REVIEW PROPOSED MEDIATION ORDER 1.0	1	\$153.00	\$153.00
11/16/2016	Anna M. Hunter	UPDATE NET ASSETS AS OF 10/31/2016	0.5	\$50.00	\$25.00
11/16/2016	Cody Smith	PREPARING EXHIBITS FOR COURT REPORTS. POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION.	0.2	\$123.00	\$24.60
11/17/2016	Anna M. Hunter	VERIFY OCT RMI BILLING, EMAILED E. SIGNOR REQUESTED DOCUMENTATION FOR OCTOBER 2016 EXPENSES	0.3	\$50.00	\$15.00
11/21/2016	Anna M. Hunter	PHONE CALL WITH D. RIFNER REGARDING WATER TRANSFER.	0.1	\$50.00	\$5.00
11/22/2016	Jere P. Cowan	RECEIPT INVOICES FOR PROCESSING AND PAYMENT; PREPARE PAYMENTS FOR SAME; FORWARD TO J. BRYANT FOR EXECUTION;	0.3	\$50.00	\$15.00
11/23/2016	Robert E. Moore, Jr.	UPDATE FROM E.SINOR ON WATER ENGINEER SEARCH .10	0.1	\$153.00	\$15.30
11/28/2016	Anna M. Hunter	PHONE CALL AND EMAIL WITH E. SIGNOR REGARDING OCT EXPENSES	0.4	\$50.00	\$20.00
11/28/2016	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. UPDATE NET ASSETS THROUGH CURRENT PERIOD.	0.3	\$123.00	\$36.90
11/28/2016	Jere P. Cowan	PREPARE AND FORWARD APPROVED EXPENSES	0.3	\$50.00	\$15.00

LAUREL HILLS WATER DISTRICT

November 2016

Date	Employee	Description	Hours	Rate	Total
11/28/2016	Jere P. Cowan	EMAIL FROM R. MOORE RE: NEW LAND OWNER; TELEPHONE CONVERSATION WITH NEW OWNER RE: CHANGE OF ACCOUNT INFORMATION AND BALANCE PAYMENT	0.3	\$50.00	\$15.00
11/28/2016	Robert E. Moore, Jr.	REVIEW EMAILS AND DOCUMENTS PROVIDED BY E.SINOR RE: 10TH REPORT, MEDIATION DATES, REVIEW AND PREPARE A DELINQUENCY NOTICE SERIES 1.0	1	\$153.00	\$153.00
11/29/2016	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: UPDATES ON MEDIATION, ENGINEER SEARCH, REVIEW OF DELINQUENCY NOTICE TRA REQUIREMENTS .3	0.3	\$153.00	\$45.90
11/30/2016	Jere P. Cowan	ASSISTANCE WITH R MOORE FINALIZING STATUS REPORTING;	0.2	\$50.00	\$10.00
11/30/2016	Robert E. Moore, Jr.	UPDATE FROM E.SINOR RE: MEDIATION AND PROCESS .25	0.25	\$153.00	\$38.25
Total					\$1,065.50

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

December 1, 2016

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

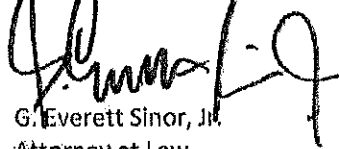
RE: *November 2016 Billings – RMI/Laurel Hills Water System in Receivership*

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

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

Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
11/1/2016	Review of Moy Toy intervention documents; Lansford & Stephens email re D Miller	0.5		
11/2/2016	email to G Matherne & R Moore with Moy Toy intervention; T.C. w E Lawless w TRA re 8th report; T.C. w Connie @ Cumberland County C&M re 8th report and orde re fees; T.C. W Ectory Lawless; email to E Lawless & K Cashman Grams w 8th report and motion; T.C. w K Cashman Grams re LHWS matters; v.m. for R Moore re LHWS matters; T.C. w R Moore re same	1.5		
11/3/2016	email to R Moore re Moy Toy interventlon petition; review of TRA pleading; G. Williams email (2) re LHWS matters; Lansford & Stephens email on Mitchell property & other LHWS items; conf. call w G Matherne & R Moore; review TRA show cause response; Review of A/R schedule; email from Heather & L&S re A/R schedule	2.4		
11/4/2016	Work on 9th report; email to E Bolin re COUD easement; email to C Smith, R Moore & J Bryant w 9th report draft and issues re 9th report	2.5		
11/6/2016	email to R Moore re 9th report & content	0.1		
11/7/2016	E Bolin email on COUD easement document and review by board; email from G Williams re addresses and other LHWS matters; calls to numerous potential engineers/operators; review new draft of condemnation petition; T.C. w C Smith re Oct fees and expenses; T.C. w R Moore re 9th report; Conf. call w G Matherne & R Moore re condemnation proceeding; T.C. w G AMatherne prior to conf call; T.C. w J Layman re LHWS issues; review of R Moore affidavit re Sept fees and expenses; finalize 9th report; send report to R Moore & K Cashman-Grams; J Cowan email re 9th report	3.3		
11/8/2016	T.C. w G Matherne; email to K Cashman-Grams re petition; email from G Williams on 2 customers; forward same to L&S; review of draft of petition and provide comments to G Matherne; Conf. call w G Matherns; K Cashman-Grams & J Layman re LHWS matters; T.C. w G Matherne re R Moore email; T.C. w K Cashman-Grams re settlement agreement	2.6		
11/9/2016	Email from J Cowan re 9th report; T.C. w G Matherne; emails to R York & E Bolin re easement form; finalize and transmit 9th report; email from R Moore re petition	2.2		
11/10/2016	emails from G Matherne, David Smith from Terra Mountain re condemnation petition; email from D Carter re 9th report & response; emails from R Moore & G Matherne re Scott Hall communication; conf. call w G Matherne & R Moore re Moy Toy communication	0.6		

11/11/2016	Review of Scott Hall email	0.1
11/13/2016	Preparation for hearing	3.2
	Travel to and from show cause hearing and status conference update & Moy Toy intervention motion; hearing on all matters	5.4
11/14/2016	Email Scott hall; Preparation of mediator list; T.C. w G Matherne re mediation and other LHWS issues; calls placed to mediators; calls with T Holter, T Shaw, J Blankenship, and G Cashion; Preparation of order mandating mediation; T.C. w J Layman re mediation order; call w R Moore & G Matherne re show cause hearing; transmit order mandating mediation	2.5
11/15/2016	review Scott Hall email on mediation; T.C. w D Berry re mediation; prep of mediator email; numerous emails from TRA and Scott Hall re mediation and mediation order; email from A Hunter re attachments for 10th report; T.C. w Lisa Ray in J Gass's office re mediator email; T.C. w R Moore re T Holter conflict; email to all parties re same; voice mail to T Holter re conflict	1.6
11/16/2016	Review of J Layman emails (2); call to J Gass & email; T.C. w J Gass re mediator email; T.C. w G Matherne re mediator emails and motion for mediation in Circuit; email to G Matherne & R Moore re mediation order emails; T.C. w R York re mediation; T.C. w Thom Holter re mediation; T.C. w R Moore re LHWS developments; review of S Hall email on mediation; T.C. w G Matherne re review of motion; review of motion to mediate in condemnation and clarification action;	1.5
11/17/2016	Numerous emails amongst parties re mediation; email and letter from Greg Cashion as potential mediator	0.4
11/18/2016	V.M. for J Blankenship re mediation; T.C. w G Matherne; T.C. w K Cashman-Grams, both about mediation; T.C. w J Blankenship re mediation; review of S Hall email on order; T.C. w G Matherne and T.C. w J Layman re LHWS mediation and order; T.C. w R York re COUD easement; T.C. w G Matherne, R Moore and then K Cashman-Grams re D Kendall convesation	1.7
11/21/2016	Conf. call w K Cashman Grams, J Layman, D Kendall & G Matherne re: D Kendall & Aqua Green re: Aqua Green property rights; conf. call w K Cashman-Grams and J Layman re same; T.C. w R Moore re same; T.C. w State Farm agent in Crossville re: LHWS; email to E Bolin @ COUD & Roger York re COUD easement	2.1
11/22/2016	E Bolin email on easement for COUD; review of K Cashman Grams letter re Aqua Green and emails with Ms. Cashman-Grams and G Matherne; draft tenth report; email to R Moore on water cut offs; V.M. for Sandra Brewer about operating LHWS; T.C. w Ray Wauford re same	2.0
11/23/2016		

11/28/2016	Review C Turner email on orders; T.C. w Anna Hunter re 10th report exhibits; email to A Hunter re same; work on 10th report; email to LHWS receivership action parties and interested persons re mediation; v.m. from R York re mediator; T.C. w Kyle from Tyze Auction re LHWS; email COUD easement to G Matherne and transmit; review R Moore email on cut offs; email to G Williams re same	1.0		
11/29/2016	Tenth report work; G. Williams email re: cutoffs of non-paying customers; T.C. w R Moore re LHWS matters; email from G Matherne re Moy Toy service; email to G Williams re the Miller account; T. Stephens e mail on D Risner account and transfer of ownership questions	0.8		
11/30/2016	S. Hall email on mediation; T. Stephens email on Maners property; Calls to potential operators/engineers for LHWS; T.C. w J Layman re mediation; review of email from Mr. Layman; 10th report completion and transmission to TRA; email exchange w J Layman	1.6		
	Hourly Billing Total	39.6	\$140.00	\$5,544.00
		<u>Miles</u>	<u>Rate</u>	
11/14/2016	Mileage from Nashville to Cookeville to Nashville	162.0		
	Mileage Total	162.0	\$0.47	\$76.14
11/14/2016	Travel Day Meals Per Diem	\$29.25		
	Other Expenses Reimburseable Total			<u>\$29.25</u>
	Balance Owed this month			\$5,649.39
	Previous Balance Owed		\$5,736.02	
	Total Amount Due and Payable			\$11,385.41

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

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

DECEMBER 7, 2016
008264.000036
J. GRAHAM MATHERNE
INVOICE # 1025782

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH NOVEMBER 30, 2016

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$16,057.00
OTHER CHARGES AND DISBURSEMENTS	\$1,307.02
TOTAL THIS INVOICE	\$17,364.02
PREVIOUSLY BILLED AND OUTSTANDING	\$21,561.45
TOTAL AMOUNT DUE	\$38,925.47

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

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

DECEMBER 7, 2016
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1025782

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH NOVEMBER 30, 2016

11/02/16	REVIEW OF MOY TOY MOTION TO INTERVENE AS TO TRA SHOW CAUSE HEARING. J. GRAHAM MATHERNE .40 hours at 270.00 per hour.	108.00
11/03/16	FURTHER REVIEW AND OUTLINING OF ISSUES RAISED BY MOY TOY MOTION TO INTERVENE (.30); LENGTHY CONFERENCE CALL WITH R. MOORE AND E. SINOR REGARDING SAME AND REGARDING PETITION AND REGARDING TRA RESPONSES TO LAUREL HILL MOTION TO DISMISS SHOW CAUSE (.80); REVIEW TRA RESPONSE (.50); FURTHER WORK ON PETITION DRAFT (.70). J. GRAHAM MATHERNE 2.30 hours at 270.00 per hour.	621.00
11/04/16	REVIEW LAUREL HILLS, WOOD BRIDGE AND CUMBERLAND POINT PLATS AND RELATED INFORMATION. J. GRAHAM MATHERNE .60 hours at 270.00 per hour.	162.00
11/06/16	REVISIONS AND DRAFTING TO PETITION. J. GRAHAM MATHERNE 2.40 hours at 270.00 per hour.	648.00
11/07/16	E-MAILS WITH SINOR REGARDING COUD EASEMENT STATUS (.10); FURTHER EDITS AND REVIEW OF PETITION (.80); E-MAIL TO SINOR AND MOORE REGARDING DRAFT PETITION (.10); OUTLINING AND DRAFTING OF MOTION REGARDING DEPOSIT/BOND	

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1025782

(.50); LEGAL RESEARCH REGARDING EMINENT DOMAIN PROCEDURES (1.00); LENGTHY TELEPHONE CONFERENCE WITH R. MOORE AND E. SINOR REGARDING SAME (.80); FURTHER DRAFTING AND FILE ORGANIZATION REGARDING EXHIBITS TO PETITION (.90); OUTLINING ISSUES TO DISCUSS WITH KENDAL (.20); E-MAIL WITH SINOR REGARDING TELEPHONE CONFERENCE WITH KELLY GRAMS (.10); FURTHER RESEARCH REGARDING EMINENT DOMAIN ISSUES (.50).
J. GRAHAM MATHERNE 5.00 hours at 270.00 per hour. 1350.00

11/08/16 ALL MATTERS REGARDING REVISIONS, EDITS AND DRAFTING AS TO PETITION (2.70); E-MAILS AND TELEPHONE CONFERENCES WITH SINOR AND R. MOORE REGARDING SAME (.90); COMPILING AND CROSS-CHECKING EXHIBITS TO SAME (.60); LENGTHY TELEPHONE CONFERENCE WITH TRA AND SINOR REGARDING STATUS ISSUES/SHOW CAUSE HEARING (.80); LENGTHY TELEPHONE CONFERENCE WITH D. KENDALL REGARDING PETITION AND RELATED ISSUES (1.30).
J. GRAHAM MATHERNE 6.30 hours at 270.00 per hour. 1701.00

11/09/16 E-MAILS WITH SINOR REGARDING COUD EASEMENT LANGUAGE ISSUES (.40); TELEPHONE CONFERENCES WITH KELLY GRAM REGARDING REVERSION ISSUES AND RELATED MATTERS (.30); TELEPHONE CONFERENCES WITH D. KENDALL REGARDING SAME AND REGARDING PETITION LANGUAGE/SCOPE (.50); REVISIONS AND FURTHER DRAFTING AS TO PETITION (2.20); NUMEROUS E-MAILS AND TELEPHONE CONFERENCES WITH E. SINOR AND WITH R. MOORE REGARDING EDITS TO PETITION (.80); FURTHER DRAFTING AND FINALIZATION OF PETITION (1.10); E-MAILS TO SCOTT HALL (MOY TOY) AND DAVID SMITH (TERRA MOUNTAIN) REGARDING PETITION AND EXHIBITS (.40); E-MAIL WITH R. MOORE AND E. SINOR REGARDING SENDING OF SAME TO HALL AND SMITH (.10); E-MAILS WITH SINOR REGARDING KEMMER EASEMENT (.10).
J. GRAHAM MATHERNE 5.90 hours at 270.00 per hour. 1593.00

11/10/16 TELEPHONE CONFERENCES AND E-MAILS WITH SCOTT HALL REGARDING CONDEMNATION PETITION AND TRA SHOW CAUSE MOTION/UPCOMING HEARING (.80); E-MAILS WITH K. GRAM AND J. LAYMAN REGARDING SAME (.30); E-MAILS AND TELEPHONE CONFERENCES WITH R. MOORE AND E. SINOR REGARDING SAME AND REGARDING PREPARATION FOR FILING OF PETITION (.90); LEGAL RESEARCH REGARDING JURISDICTION/VENUE ISSUES (.60); E-MAILS WITH D. SMITH REGARDING TERRA MOUNTAIN AND

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1025782

REGISTERED AGENT ISSUES (.30); TELEPHONE
CONFERENCE WITH CIRCUIT COURT CLERK REGARDING
FILING ISSUES (.10); DRAFTING OF SUMMONS AND
CHECKING OF INFORMATION REGARDING SAME (.40);
FILE ORGANIZATION (.30); DRAFTING AND OUTLINING
REGARDING MOTION FOR EXPEDITED MEDIATION
(1.40).

J. GRAHAM MATHERNE 5.10 hours at 270.00 per hour. 1377.00

11/11/16 E-MAILS WITH SCOTT HALL REGARDING PRE-FILING
CONDEMNATION PETITION (.30); E-MAILS WITH R.
MOORE AND E. SINOR REGARDING SAME (.20); REVIEW
MATERIAL REGARDING SERVICE OF PROCESS AND
ATTENDANT MOTION FOR MEDIATION (.90); FURTHER
DRAFTING REGARDING SAME (.50); REVIEW PLEADINGS
REGARDING SHOW CAUSE MOTION AND RESPONSES AS TO
MONDAY HEARING (.60).

J. GRAHAM MATHERNE 2.50 hours at 270.00 per hour. 675.00

11/14/16 REVIEW PLEADINGS REGARDING MOTION TO SHOW CAUSE
AND REGARDING PRE-FILING OF CONDEMNATION
PETITION IN PREPARATION FOR HEARING IN
COOKEVILLE (.50); TRAVEL TIME TO COOKEVILLE
(1.50); CONFERENCE WITH COUNSEL PREHEARING
(.50); ATTEND DOCKET CALL AND HEARING (1.50);
CONFERENCE WITH SINOR AND TELEPHONE CONFERENCE
WITH MOORE REGARDING OUTSTANDING ISSUES (.50);
TRAVEL TO CROSSVILLE TO REGISTER OF DEED'S
OFFICE (.40); RECORDING OF KEMMER EASEMENT AND
RESEARCH VARIOUS RECORDS OF REGISTER OF DEEDS
(1.60); TRAVEL FROM CROSSVILLE (2.00).

J. GRAHAM MATHERNE 8.50 hours at 270.00 per hour. 2295.00

11/15/16 E-MAILS WITH R. MOORE AND SINOR AND TELEPHONE
CONFERENCE WITH SAME REGARDING MEDIATION, TERRA
MOUNTAIN ISSUES, CONDEMNATION PETITION ISSUES
AND RELATED MATTERS (.70); DRAFTING REGARDING
MOTION TO MEDIATION TO SERVE IN CONDEMNATION
PETITION CASE (.90); E-MAILS AND TELEPHONE
CONFERENCE WITH SCOTT HALL REGARDING MEDIATION,
SCHEDULES AND RELATED MATTERS (.20); E-MAILS
WITH D. SMITH REGARDING TERRA MOUNTAIN (.20).

J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1025782

11/16/16 REDRAFTING AND REVISIONS TO MOTION TO ORDER
TERRA MOUNTAIN TO MEDIATE (1.80); NUMEROUS
E-MAILS AMONGST COUNSEL REGARDING PROPOSED ORDER
REGARDING MEDIATION (.50); E-MAILS WITH R.
MOORE AND E. SINOR REGARDING SAME (.20);
TELEPHONE CONFERENCE WITH MARK PICKETT
REGARDING TERRA MOUNTAIN (.10); CROSS-REFERENCE
AND FINAL COMPLETION AS TO EXHIBITS TO PETITION
(.40).
J. GRAHAM MATHERNE 3.00 hours at 270.00 per hour. 810.00

11/16/16 RECEIPT AND REVIEW OF FOUR (4) CUMBERLAND
COUNTY TITLE SEARCHES FROM GREG VICK.
(PARALEGAL)
SUSANNE C. PUGH 1.50 hours at 85.00 per hour. 127.50

11/17/16 FURTHER WORK REGARDING FINALIZATION OF PETITION
AND REVISION/DRAFTING OF MOTION TO ORDER TERRA
MOUNTAIN TO MEDIATION (2.30); REVIEW NUMEROUS
E-MAILS RELATING TO COMMUNICATION AMONGST
COUNSEL AS TO MEDIATION ORDER AND LOGISTICS OF
MEDIATION (.80).
J. GRAHAM MATHERNE 3.10 hours at 270.00 per hour. 837.00

11/17/16 PREPARE DOCUMENTS FOR FILING WITH COURT CLERK;
PREPARED FEDERAL EXPRESS PACKAGE.
PAMELA Y GAMBEL .80 hours at 85.00 per hour. 68.00

11/17/16 CONFERENCE WITH GRAHAM MATHERNE REGARDING TITLE
SEARCHES. (PARALEGAL)
SUSANNE C. PUGH .10 hours at 85.00 per hour. 8.50

11/18/16 NUMEROUS E-MAILS WITH ALL COUNSEL REGARDING
MEDIATION ISSUES AND DRAFT ORDERS REGARDING
SAME.
J. GRAHAM MATHERNE .50 hours at 270.00 per hour. 135.00

11/21/16 LETTERS TO CUMBERLAND POINT, WOODRIDGE, LAUREL
HILLS AND ATLANTIC COAST CONSERVANCY REGARDING
PETITION FOR CONDEMNATION (.70); CHECK SERVICE
PACKETS TO MOY TOY AND TO TERRA MOUNTAIN (.20);
REPORT E-MAIL TO R. MOORE AND E. SINOR (.50);
TELEPHONE CONFERENCES WITH SINOR AND E-MAILS
FROM GROUP REGARDING CROSS-ORDERS AS TO
MEDIATION (.50); LENGTHY TELEPHONE CONFERENCE
WITH DART KENDALL REGARDING PROPERTY INTERESTS
AND REGARDING KENDALL MEETING WITH MOY TOY AND
CONVERSATION WITH MCCLUNG (.90); TELEPHONE
CONFERENCE WITH R. MOORE AND E. SINOR REGARDING
SAME (.50); FURTHER TELEPHONE CONFERENCE WITH
KENDALL REGARDING POTENTIAL MEETING WITH MOY
TOY (.20); E-MAILS WITH GROUP REGARDING

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1025782

CONFERENCE CALL (.40).
J. GRAHAM MATHERNE 3.90 hours at 270.00 per hour. 1053.00

11/21/16 PREPARED FILE STAMPED COPIES FOR MAILING TO
DEFENDANTS. PREPARED COPIES FOR ADDITIONAL
PERSONS. SCANNED AND UPDATED DM WITH DOCUMENTS.
PAMELA Y GAMBEL 1.00 hours at 85.00 per hour. 85.00

11/22/16 PREPARATION AND REVIEW OF MATERIAL FOR
CONFERENCE CALL WITH COUNSEL GROUP (.40);
LENGTHY TELEPHONE CONFERENCE WITH COUNSEL GROUP
AND AQUA GREEN REGARDING OPEN ISSUES (1.50);
E-MAILS REGARDING UNAVAILABILITY OF MEDIATORS
IN DECEMBER (.20); FURTHER TELEPHONE CONFERENCE
WITH COUNSEL GROUP REGARDING OPEN ISSUES,
MEDIATION, ETC. (.50); E-MAILS WITH SINOR
REGARDING COUD EASEMENT (.50); REVISION OF SAME
(.50).
J. GRAHAM MATHERNE 3.60 hours at 270.00 per hour. 972.00

11/23/16 E-MAILS WITH TRA COUNSEL AS TO LETTER DRAFTS
(.50); E-MAILS TO SINOR REGARDING STATUS OF
MEDIATION AND RELATED MATTERS (.40); E-MAILS TO
SINOR REGARDING COUD EASEMENT (.20).
J. GRAHAM MATHERNE 1.10 hours at 270.00 per hour. 297.00

11/28/16 E-MAILS WITH COUNSEL GROUP REGARDING COMPETING
ORDERS AS TO MEDIATION AND ISSUES RELATING TO
MEDIATION (.20); E-MAILS WITH SINOR REGARDING
COUD EASEMENT (.20); WORK ON TEMPLATE
DEEDS/EASEMENTS (.70).
J. GRAHAM MATHERNE 1.10 hours at 270.00 per hour. 297.00

11/29/16 E-MAIL WITH SCOTT HALL RE CONDEMNATION ACTION
(.20); TELEPHONE CONFERENCE WITH DAVID CARTER
(CUMBERLAND POINT) REGARDING SAME AND REGARDING
FURTHER ISSUES (.40); E-MAIL TO R. MOORE AND E.
SINOR REGARDING SERVICE STATUS ON CONDEMNATION
ACTION AND REGARDING CONVERSATION WITH CARTER
(.30);
J. GRAHAM MATHERNE .90 hours at 270.00 per hour. 243.00

11/30/16 E-MAILS WITH COUNSEL REGARDING MEDIATION
ISSUES.
J. GRAHAM MATHERNE .20 hours at 270.00 per hour. 54.00

TOTAL SERVICES

61.80 \$16,057.00

OUTSIDE DELIVERY COSTS
COLOR PHOTOCOPIES

19.84
112.10

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1025782

OUTSIDE COPY CHARGES	60.75
TRAVEL EXPENSES	125.28
PHOTOCOPIES BCROSBY 11	1.65
PHOTOCOPIES WTYLER 212	31.80
PHOTOCOPIES JKMONTGOMERY 4	0.60
FILING FEES - - VENDOR: CUMBERLAND COUNTY CLERK	324.50
FILING FEES	
Bank ID: PNC Check Number: 345365	
RECORDING FEES - - KEMMER EASEMENT	18.50
REGISTRATION FEES - - VENDOR: CUMBERLAND COUNTY	12.00
REGISTER OF DEEDS	
TITLE COSTS - - VENDOR: GREGORY VICK &	600.00
ASSOCIATES- 4 TITLE SEARCHES (KEMMER, CRAB	
ORCHARD UTILITY DISTRICT, MOY TOY, LLC (PARCEL	
056) AND MOY TOY, LLC (PARCEL 031)	

OTHER CHARGES AND DISBURSEMENTS	\$1,307.02

TOTAL THIS INVOICE	\$17,364.02

PREVIOUSLY BILLED AND OUTSTANDING	\$21,561.45

TOTAL AMOUNT DUE	\$38,925.47
	=====

-----TIME AND FEE SUMMARY-----				
-----	TIMEKEEPER-----	RATE	HOURS	FEEES
J	MATHERNE PARTNER	270.00	58.40	15768.00
P	GAMBEL PARALEGAL	85.00	1.80	153.00
S	PUGH PARALEGAL	85.00	1.60	136.00

RMI EXP RECOVERABLE LHWD
11/1/16 Through 11/30/16

Category Description	11/1/16- 11/30/16	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-163.90	-163.90
5610-CONTRACT LABOR RMI	-911.50	-911.50
5690-RMI OH EXPENSE	-169.40	-169.40
TOTAL 5100 FEES RMI	-1,244.80	-1,244.80
5150 FEES LEGAL		
5400-LEGAL FEES	-23,013.41	-23,013.41
TOTAL 5150 FEES LEGAL	-23,013.41	-23,013.41
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-36.00	-36.00
6210-POSTAGE	-2.33	-2.33
TOTAL 5300 EXPENSES	-73.79	-73.79
OVERALL TOTAL	-24,332.00	-24,332.00

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.

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.
3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of November 1, 2016 through November 30, 2016 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

4 day of January, 2016.

E. Laney
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.

No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

2. I am the Chief Operations Officer of Receivership Management, Inc., the Receiver appointed in this action by the Court 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



expenses incurred for the period of time between November 1, 2016 and November 30, 2016 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 \$6967.98 (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 \$17,364.02 (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

27th day of December, 2016.


Notary Public
Commission Expires: 1/6/2020



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

TENNESSEE REGULATORY AUTHORITY

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

} 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 January, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for November of 2016, 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 \$24,332.00.

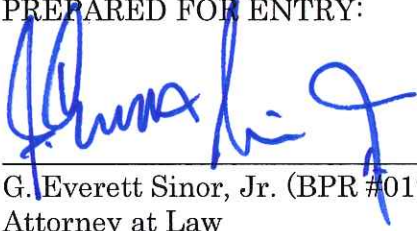
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$6967.98 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 \$17,364.02.

ENTERED this ____ day of _____, 2017.

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:

James R. Layman, 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

Melanie Davis, Esq.
Kizer & Black
329 Cates Street
Maryville, Tennessee 37801

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.