

**G. EVERETT SINOR, JR.**  
Attorney at Law

June 30, 2017

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

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

VIA UNITED STATES FIRST CLASS MAILS

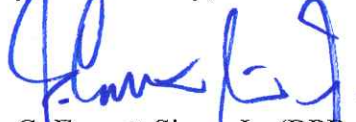
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Sixteenth Report and Motion for Approval of Fees and Expenses, Authorization for Payment of Certain Fees and Expenses, and for an Interim Taxation of Costs; and,
2. A proposed Order Granting the Receiver's Motion.

Please return to me a copy of these documents, once stamped filed with your office, in the self-addressed, stamped envelope. Thanking you for your consideration of this matter, I remain,

yours sincerely,



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

Attorney at Law

Enclosures

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

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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

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RECEIVER'S SIXTEENTH 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 Sixteenth Report, and moves this Honorable Court for an order approving the fees and expenses presented for payment by the Receiver and authorizing payment to the Receiver of certain fees and expenses and for an interim taxation of costs.

1. On October 26, 2015, the Plaintiff, the Tennessee Public Utility Commission [hereinafter the "TPUC" or the "Commission"], filed a Motion for Appointment of Receiver in the above-styled action. Said motion was granted that same day, and, pursuant to Tenn.

Code Ann. §§ 65-3-105 and 29-1-101, the Court appointed Receivership Management, Inc. as Receiver of the Laurel Hills Water System by order dated October 26, 2015.<sup>1</sup>

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

#### **Implementation of Receivership Plan**

3. The Receiver filed its Receivership Plan Implementation Progress Report with this Honorable Court on August 16, 2016, and reference is made to that progress report, as well as the Receiver's Eighth through Fifteenth Reports, for the Receiver's activities relative to the Receivership Plan. As previously reported, the Receiver's preferred bidder, Aqua Green Utility, Inc. has noted numerous issues relative to the LHWS which would impact its decision to move forward and acquire the LHWS.

4. With respect to ownership/titling issues of the LHWS, the Receiver has still not received a substantive response to Mr. Sinor's April 12, 2016 letter from Moy Toy, LLC which requested information concerning such issues.

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

<sup>2</sup> *See* the Receiver's subsequent reports, filed with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016, June 27, 2016, August 4, 2016, August 26, 2016, October 3, 2016, November 10, 2016, December 5, 2016, January 13, 2017, February 3, 2017, February 28, 2017, April 18, 2017, and May 22, 2017, respectively.

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

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

6. In May of 2017, 90 of the 131 customers of the LHWS timely paid their water bill. Of the 41 non-paying customers, 24 are in the Cumberland Pointe condominium units, and 17 are located elsewhere on Renegade Mountain. 22 Cumberland Pointe condominium unit non-paying customers have failed to pay their water bill for two (2) or more months and, the Receiver understands, have had their water cut off. Two (2) additional Cumberland Pointe customers failed to pay their bill in May, 2017, and will be monitored going forward. As to non-Cumberland Pointe condominium unit owners, seven (7) customers have failed to pay their water bill for two (2) or more months. Five (5) customers have had their water service terminated or are in the process of having their water service terminated: three (3) Laurel Hills Condominium units and two (2) residences on Renegade Mountain. As to the other two (2) delinquent customers, one received a first notice of delinquency with the June billing statement, and the other received a final notice of delinquency with the June billing statement.

7. Grading work referenced in the Receiver's previous report<sup>3</sup> has not yet commenced but is expected to start shortly. With Mr. Williams's assistance, a water quality report was prepared for the LHWS for 2016 and was distributed to each LHWS customer with their June, 2017 bill. A copy of said water quality report is attached hereto

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<sup>3</sup> Receiver's Fifteenth Report, filed May 22, 2017, pp. 3-4, ¶ 7.

as Exhibit A and is incorporated herein by reference. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

8. On a conference call, this Honorable Court ruled that a hearing would be scheduled at the court's Cumberland County August 16, 2017 docket call.

#### **Current Financial Information**

9. As of May 31, 2017, there was an accounts receivable past due balance of \$33,019.48.<sup>4</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.

10. On a cash basis, the LHWS had a net gain in April, 2017 of \$6511.09.<sup>5</sup> See Exhibit C, attached hereto and incorporated herein by reference. As of April 30, 2017, the LHWS had a cash balance of \$13,757.17 in its main operating account; as of May 31, 2017, the LHWS has a cash balance of \$13,399.28 in its main operating account. See Collective Exhibit D, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in April and May of 2017.<sup>6</sup>

#### **Current Modified Accrual Basis Financial Documents & Current Estimated Deficit**

11. As previously reported, even laying aside Mr. Matherne's current and projected fees and expenses, the LHWS still faces projected financial deficits. In its projection, the Receiver attributes the problem to the fact that less customers are paying their bill than was initially projected when the current rate was proposed. The Receiver

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<sup>4</sup> Of this amount, \$4646.24 is less than a month past due, and \$28,373.24 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 C.

<sup>5</sup> This is somewhat misleading, as this merely shows the LHWS's net receipts over disbursements in April of 2017. On an accrual basis, the LHWS currently has a deficit, which is discussed further, *infra*.

<sup>6</sup> *Id.* It should also be noted that this does not include costs of this matter previously taxed on an interim basis to the Tennessee Regulatory Commission, which amount to \$89,493.23 (the amount taxed to the Commission prior to the July 1, 2016 increase in rates), AS WELL AS significant additional amounts taxed to the Commission to reflect Mr. Matherne's fees and expenses and further losses even with the elevated rate.

now estimates that a break-even point for the Receiver's monthly fees and expenses is approximately \$4600.00.<sup>7</sup>

12. The Receiver has generated a number of internal, unaudited financial documents prepared on a modified accrual basis, which are attached hereto as Collective Exhibit E and which are incorporated herein by reference. Those documents are (1) an estimated monthly budget or monthly income statement; (2) a balance sheet as of May 31, 2017; and (3) a cash flow statement showing projected cash flows for the month of June, 2017.

13. The Receiver estimates that the LHWS will lose \$1428.00 per month.<sup>8</sup> For purposes of generating a balance sheet, only current assets (cash) were used towards determining the assets of the estate, with all known fees and expenses generated prior to the balance sheet date used towards determining liabilities. This document, calculated on a modified accrual basis, shows the LHWS with an \$1152.83 deficit as of May 31, 2017. The cash flow statement shows the LHWS having sufficient cash to meet its needs in the month of June, 2017.

14. To rectify the currently projected deficit of \$1152.83, the Receiver proposes that this amount be taxed on interim basis to the Commission in addition to Mr. Matherne's fees and expenses. The exact amounts to be paid out of the receivership estate and to be taxed on an interim basis to the Commission are delineated below.

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

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<sup>7</sup> This includes the Receiver's fees as well as Mr. Sinor's fees, but excludes Mr. Matherne's fees, which have always been taxed on an interim basis to the Commission by this Honorable Court, and which the Receiver presumes will continue to be so taxed for the distant future. The break-even number is lower this month than previously reported due to the increasing number of non-paying customers.

<sup>8</sup> Id. See Collective Exhibit E.

15. Pursuant to the Amended Order Appointing Receiver, compensation for the Receiver is payable from funds or assets of the LHWS, if such funds are available. If the funds or assets of the LHWS are not available to pay Receivership fees and costs, then those fees and costs are to be taxed as interim court costs to be paid by the Commission. The Receiver is to submit invoices to the Commission on a monthly basis for approval. These invoices are reviewed and paid after approval of the Commission and the Court, through an interim taxation of costs, if necessary.<sup>9</sup>

16. As shown in Collective Exhibit F, 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 estate for the period of April 1, 2017 through April 30, 2017 in the amount of \$3545.85.<sup>10</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 F for the period April 1, 2017 through April 30, 2017 in the amount of \$2775.90. 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 F for the period April 1, 2017 through April 30, 2017 in the amount of \$2025.00.

17. The Commission has determined these fees, costs and expenses to be reasonable, appropriate and necessary for the services rendered for the Receivership, and, thus, these fees, costs and expenses have been approved for payment by the Commission. *See* Affidavit of Kelly Cashman-Grams, General Counsel for the Commission, attached

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<sup>9</sup> Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

<sup>10</sup> This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of April 1, 2017 through April 30, 2017, which total \$451.00.

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

18. 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 April of 2017: \$3545.85; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for April of 2017: \$2775.90; and,
- c. Invoice for Mr. Matherne working under Mr. Moore for April of 2017: \$2025.00.

19. As referenced above, the Receiver projects that there is an \$1152.83 deficit in the LHWS as of May 31, 2017. Typically, Mr. Matherne's fees and expenses for the previous month are sought to be taxed on an interim basis to the Commission, while Mr. Sinor's fees and expenses, as well as the fees and expenses of Ms. Jeanne Bryant, Mr. Robert E. Moore, Jr. and other persons employed by the Receiver, are sought to be paid out of the receivership estate. With this motion, the Receiver proposes rectifying the current deficit by allocating an additional \$1152.83 to the amount taxed on an interim basis to the Commission.<sup>11</sup>

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

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<sup>11</sup> *See* Collective Exhibit F.



**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 \$8346.75, 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 \$5168.92 (constituting all fees and expenses save Mr. Matherne's minus the projected deficit as of May 31, 2017); and (b) tax costs to the Commission on an interim basis in the amount of \$3177.83 (constituting the amount of Mr. Matherne's fees and expenses plus the projected deficit as of May 31, 2017).

DATED: June 30, 2017.

Respectfully Submitted,

Laurel Hills Water System in Receivership

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

G. Everett Sinor, Jr.  
G. Everett Sinor, Jr. (BPR#017564)  
Attorney at Law  
Counsel for Receivership Management, Inc.  
3504 Robin Road  
Nashville, Tennessee 37204  
615-969-9027 (Phone)  
Everett.Sinor@gmail.com (Email)

*by [Signature]  
by permission  
granted on  
June 16, 2017*

Certificate of Service

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

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

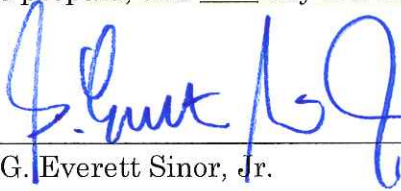
James L. Gass, Esq.  
Ogle, Gass & Richardson  
Counsel for Laurel Hills Condominiums  
Property Owners Association  
103 Bruce Street  
Sevierville, Tennessee 37862

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

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

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

via the United States Mails, postage prepaid, this <sup>30<sup>th</sup></sup> day of June, 2017.

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



# LAUREL HILLS CONDO ASSN. WATER SYSTEM Water Quality Report 2016

## Is my drinking water safe?

Yes, our water meets all of EPA's health standards. We have conducted numerous tests for over 80 contaminants that may be in drinking water. As you'll see in the chart on the back, we only detected 10 of these contaminants. We found all of these contaminants at safe levels.

## What is the source of my water?

Your water, which is surface water, comes from Otter Creek Impoundment. Our goal is to protect our water from contaminants and we are working with the State to determine the vulnerability of our water source to **potential**

contamination. The Tennessee Department of Environment and Conservation (TDEC) have prepared a Source Water Assessment Program (SWAP) Report for the untreated water sources serving this water system. The SWAP Report assesses the susceptibility of untreated water sources to **potential** contamination. To ensure safe drinking water, all public water systems treat and routinely test their water. Water sources have been rated as reasonably susceptible, moderately susceptible or slightly susceptible based on geologic factors and human activities in the vicinity of the water source. The Renegade Mountain water source was rated as slightly susceptible to potential contamination.

An explanation of Tennessee's Source Water Assessment Program, the Source Water Assessment summaries, susceptibility scorings and the overall TDEC report to EPA can be viewed online at [www.tn.gov/environment/dws/dwassess.shtml](http://www.tn.gov/environment/dws/dwassess.shtml) or you may contact the Water System to obtain copies of specific assessments.

## Why are there contaminants in my water?

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. Community water systems are required to disclose the detection of contaminants; however, bottled water companies are not required to comply with this regulation. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the Environmental Protection Agency's Safe Drinking Water Hotline (800-426-4791).

Este informe contiene información muy importante. Tradúscalo o hable con alguien que lo entienda bien.

For more information about your drinking water, please call Laurel Hills Condo Assn. Water at 931-261-4583

## How can I get involved

The Renegade Mountain Water office is located at 3712 Cumberland Gardens Trail. Any questions, complaints, or suggestions can be addressed at this location.

## Is our water system meeting other rules that govern our operations?

The State and EPA require us to test and report on our water on a regular basis to ensure its safety. We have met all of these requirements. Results of unregulated contaminant analysis are available upon request. We want you to know that we pay attention to all the rules.

## Other Information

Due to all water containing dissolved contaminants, occasionally your water may exhibit slight discoloration. We strive

to maintain the standards to prevent this. We at Renegade Mountain Water work around the clock to provide top quality water to every tap. We ask that all our customers help us protect our water sources, which are the heart of our community, our way of life and our children's future.

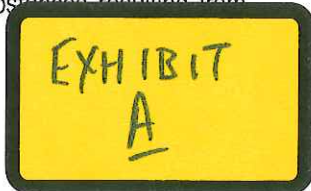
## Do I Need To Take Special Precautions?

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have under-gone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about not only their drinking water, but food preparation, personal hygiene, and precautions in handling infants and pets from their health care providers. EPA/CDC guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbiological contaminants are available from the Safe Drinking Water Hotline (800-426-4791).

## Water System Security

Following the events of September 2001, we realize that our customers are concerned about the security of their drinking water. We urge the public to report any suspicious activities at any utility facilities, including treatment plants, pumping stations, tanks, fire hydrants, etc., to 931-484-8762

The source of drinking water (both tap and bottled) includes rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animal or human activity.



Contaminants that may be present in source water include:

- . Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife.
- . Inorganic contaminants, such as salts and metals, which can be naturally-occurring, or result from urban storm water runoff , industrial, or domestic wastewater discharges, oil and gas production, mining and farming.

Pesticides

and herbicides, which may come from a variety of sources such as agriculture, urban storm water, and residential uses.

. Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water, and septic systems.

. Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, EPA and the Tennessee Department of Environment and Conservation prescribe regulations which limit the amounts of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Renegade Mountain Water is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>

# Water Quality Data

2016

## What does this chart mean?

- **MCLG** - Maximum Contaminant Level Goal, or the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
- **MCL** - Maximum Contaminant Level, or the highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology. To understand the possible health effects described for many regulated constituents, a person would have to drink 2 liters of water every day at the MCL level for a lifetime to have a one-in-a-million chance of having the described health effect.
- **MRDL**: Maximum Residual Disinfectant Level or MRDL: The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for the control of microbial contaminants.
- **MRDLG**: Maximum residual disinfectant level goal. The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
- **AL** - Action Level, or the concentration of a contaminant which, when exceeded, triggers treatment or other requirements which a water system must follow. Non-Detects (ND) - laboratory analysis indicates that the contaminant is not present.
- Parts per million (**ppm**) or Milligrams per liter (mg/l) – explained as a relation to time and money as one part per million corresponds to one minute in two years or a single penny in \$10,000.
- Parts per billion (**ppb**) or Micrograms per liter - explained as a relation to time and money as one part per billion corresponds to one minute in 2,000 years, or a single penny in \$10,000,000.
- Nephelometric Turbidity Unit (**NTU**) - nephelometric turbidity unit is a measure of the clarity of water. Turbidity in excess of 5 NTU is just noticeable to the average person.
- **TT** - Treatment Technique or a required process intended to reduce the level of a contaminant in drinking water.

Contaminant	Violation Yes/No	Level Detected	Range of Detections	Date of Sample	Unit Measurement	MCLG	MCL	Likely Source of Contamination
Total Coliform Bacteria	NO	0		2016		0	< 1 positive sample	Naturally present in the environment
Turbidity <sup>1</sup>	NO	.07 ntu ave.	.26-.05	2016	NTU	n/a	95 % <.30 ntu	Soil runoff
Total Organic Carbon **	NO	NA		2016	ppm	TT	TT	Naturally present in the environment.
Copper*	NO	90 <sup>th</sup> % =0.098 ppm		2014	ppm	1.3	AL=1.3 ppm	Corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives
Lead*	NO	90 <sup>th</sup> % 6.5 ppb		2014	ppb	0	AL=15ppb	Corrosion of household plumbing systems, erosion of natural deposits
Fluoride	NO	.53 ppm ave.	.39-.73	2016	ppm	4	4	Erosion of natural deposits; water additive which promotes strong teeth.
Chlorine	NO	1.4 mg/l monthly	.80-2.2 mg/l	2016	ppm	4	4	Water additive used to control microbes.
Sodium	NO	6.9 ppm		2016	ppm	N/A	N/A	Erosion of natural deposits; used in water treatment
TTHM *** [Total trihalomethanes]	NO	29 ppb ave.	27-31	2016	ppb	n/a	80	By-product of drinking water chlorination
Haloacetic Acids *** (HAA5)	NO	22 ppb ave.	13-31	2016	ppb	N/A	60	By-product of drinking water disinfection.

<sup>1</sup>100% of our samples were below the turbidity limit.

\*\* The Treatment Technique requirements were met for TOC's

**CROSS CONNECTIONS:** Over the next few months, the warm weather will bring people outdoors to work in their gardens and yards, and begin to get swimming pools ready. Laurel Hills would like to ensure that our customers are aware of the dangers associated with these activities. An ordinary garden hose is a common way to contaminate a water supply when the hose is submersed in and liquid or attached to certain devices used to spray pesticides or herbicides.. This forms a cross connection. A cross connection is a situation where a possible source of contamination is directly linked to our public water system. If the end of your hose is connected to a chemical container, swimming pool, or other contaminant during a water break or fire, the substance can be siphoned back into the water system. This condition, called back siphonage, could cause a public health hazard. Devices are available to prevent this problem; However, the best solution is to be careful how you use your water hose. Remember; never place your water hose into anything you would not want to drink.

**Turbidity:** Turbidity does not present any risk to your health. We monitor turbidity, which is a measure of the cloudiness of the water, because it is a good indicator that our filtration system is functioning properly.

. If you would like more information, Please call Gerald Williams at 931-261-4583.



3:24 PM

05/31/17

# Laurel Hills Water System In Receivership A/R Aging Summary As of May 31, 2017

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	838.92	1,181.64
BRASSELL, CRYSTAL	0.00	0.24	0.00	0.00	0.00	0.24
CPCA (84)	0.00	2,741.76	2,741.76	2,513.28	18,963.84	26,960.64
HAISER, GARY & JEANNIE	0.00	114.24	0.00	0.00	0.00	114.24
JUDD, JONATHAN	0.00	114.24	2.48	0.00	0.00	116.72
KRIES, RICHARD	0.00	76.40	0.00	0.00	0.00	76.40
LATHAM, KENT	0.00	114.24	114.24	114.24	456.96	799.68
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	114.24	456.96	799.68
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	456.96	799.68
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	456.96	799.68
LOUD, PAUL F.	0.00	114.24	0.00	0.00	0.00	114.24
MURPHY, JEFF	0.00	114.24	114.24	0.00	0.00	228.48
PETERS, JOHN (1)	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (2)	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (3)	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (4)	0.00	114.24	0.00	0.00	0.00	114.24
RIFNER, DAVE	0.00	114.24	114.24	114.24	0.00	342.72
ROBINSON, CARL	0.00	114.24	0.00	0.00	0.00	114.24
WALL, TRACY	0.00	114.24	0.00	0.00	0.00	114.24
<b>TOTAL</b>	<b>0.00</b>	<b>4,646.24</b>	<b>3,543.92</b>	<b>3,198.72</b>	<b>21,630.60</b>	<b>33,019.48</b>

EXHIBIT  
B  
—

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

	FOR THE PERIOD		
	10/26/2015 3/31/2017	4/1/2017 4/30/2017	10/26/2015 4/30/2017
<b>RECEIPTS</b>			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	146,793.74	10,852.80	157,646.54
<b>TOTAL REVENUE</b>	<b>146,793.74</b>	<b>10,852.80</b>	<b>157,646.54</b>
<b>DISBURSEMENTS</b>			
<b>FEES</b>			
5695-ACCOUNTING FEES	4,100.00	626.79	4,726.79
5400-LEGAL FEES	961.50	-	1,874.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
<b>TOTAL FEES</b>	<b>7,407.06</b>	<b>626.79</b>	<b>8,946.35</b>
<b>OTHER EXPENSES:</b>			
5697-OTHER FEES	6,200.00	750.00	6,950.00
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	63,682.36	2,918.22	66,600.58
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	46.70	58.70
6330-COURT COSTS	-	-	-
6340-INSURANCE	16,496.03	-	16,496.03
6350-TRAVEL	-	-	-
<b>TOTAL OTHER EXPENSES</b>	<b>89,215.29</b>	<b>3,714.92</b>	<b>92,930.21</b>
<b>TOTAL EXPENSES</b>	<b>96,622.35</b>	<b>4,341.71</b>	<b>101,876.56</b>
<b>NET RECEIPTS LESS DISBURSEMENTS</b>	<b>50,171.39</b>	<b>6,511.09</b>	<b>55,769.98</b>
<b>SCHEDULE OF CHANGE IN NET ASSETS</b>			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	50,171.39	6,511.09	56,682.48
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
<b>NET ASSETS</b>	<b>50,271.39</b>		<b>56,782.48</b>

5/18/2017 11:47

TOTAL ASSETS	26,439.22	32,950.31
TOTAL LIABILITIES	23,832.17	23,832.17
<b>NET ASSETS</b>	<b>50,271.39</b>	<b>56,782.48</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

4/30/2017

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	13,769.17	13,757.17
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	-	
	<u>13,757.17</u>	<u>13,757.17</u>
3-May-17 09:59 AM	-	

OUTSTANDING CHECKS  
LANSFORD & STEPHENS

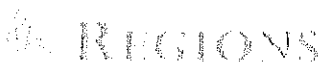
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2015 TAX PYMT	1,624.00	PAID 9/9/16
2016 TAX PYMT	1,230.00	

EXHIBIT  
D





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**  
 April 1, 2017 through April 28, 2017

**SUMMARY**

Beginning Balance	\$7,258.08	Minimum Balance	\$7,258
Deposits & Credits	\$10,852.80 +	Average Balance	\$11,294
Withdrawals	\$46.70 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$4,295.01 -		
Ending Balance	\$13,769.17		

**DEPOSITS & CREDITS**

04/10	Deposit - Thank You	1,485.12
04/14	Deposit - Thank You	8,339.52
04/18	Deposit - Thank You	342.72
04/28	Deposit - Thank You	685.44
Total Deposits & Credits		\$10,852.80

**WITHDRAWALS**

04/14	Harland Clarke Chk Orders Laurel Hills C	46.70
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**CHECKS**

Date	Check No.	Amount	Date	Check No.	Amount
04/17	1094	626.79	04/17	1096	2,717.22
04/17	1095	201.00	04/27	1097	750.00
Total Checks					\$4,295.01

\* Break In Check Number Sequence.

**DAILY BALANCE SUMMARY**

Date	Balance	Date	Balance	Date	Balance
04/10	8,743.20	04/17	13,491.01	04/27	13,083.73
04/14	17,036.02	04/18	13,833.73	04/28	13,769.17

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

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**PRICING FOR CERTAIN TREASURY MANAGEMENT  
SERVICES & ANALYZED DEPOSITORY PRODUCTS  
IS CHANGING EFFECTIVE JUNE 1, 2017.  
CHANGES WILL BE REFLECTED BEGINNING WITH  
THE JUNE ANALYSIS STATEMENT YOU WILL  
RECEIVE IN JULY. TO VIEW ALL CHANGES,  
VISIT REGIONS.COM/SPECIALMESSAGE. PLEASE  
CONTACT YOUR TREASURY MANAGEMENT OFFICER  
WITH QUESTIONS SPECIFIC TO YOUR ACCOUNT.**

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 1-800-374-5791).



**Thank You For Banking With Regions!**  
2017 Regions Bank Member FDIC. All loans subject to credit approval.

LAUREL HILLS WATER DISTRICT  
REGIONS BANK ACCOUNT 232618611

5/31/2017

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	13,904.89	13,399.28
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(493.61)	
	<u>13,399.28</u>	<u>13,399.28</u>

14-Jun-17  
02:51 PM

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OUTSTANDING CHECKS  
LANSFORD & STEPHENS

1106                      493.61

493.61

2015 TAX PYMT  
2016 TAX PYMT

1,624.00 PAID 9/9/16  
1,230.00

## Estimated Monthly Income Statement - LHWS\*

### Income

Average Deposits	<u>\$11,400.00</u>	
<b>Average Income</b>		<b>\$11,400.00</b>

### Expenses

CNA Insurance	\$1,148.00	
Crab Orchard Utility District (Wholesale Water)	\$3,400.00	
Volunteer Electric Company (Electric)	\$600.00	
TDEC	\$25.00	
Gerald Williams (Contract Operator)	\$750.00	
Lansford & Stephens (Accountants)	\$333.00	
MicroBac	\$67.00	
Repair Reserve	\$500.00	
RMI & Sinor	<u>\$6,000.00</u>	
<b>Average Expenses</b>		<b>\$12,823.00</b>
<b>Projected Monthly Income (Deficit)</b>		<b>-\$1,423.00</b>

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



## LHWS Balance Sheet (as of 5/31/2017) - Modified Accrual Basis\*

### Current Assets

Cash	\$13,399.28	
Prepaid Expense - CNA Insurance (deposit)	\$2,297.33	
Receivable from TRA (March 2017 F&E for RMI & Sinor)	<u>\$4,285.38</u>	
<b>Total Current Assets</b>		<b>\$19,981.99</b>

### Liabilities

Payable - Lansford & Stephens (May Billing)	\$300.00	
Payable - Gerald Williams (May Billing)	\$750.00	
Payable - March 2017 F&E RMI & Sinor	\$4,920.74	
Payable - April 2017 F&E RMI & Sinor	\$6,321.75	
Payable - May 2017 F&E RMI & Sinor (estimated)	\$4,100.00	
Payable - R&R Asphalt Paving (estimate on grading work)	\$2,800.00	
Reserve (Lansford & Stephens Tax Bill - 2016 Tax Form Prep.)	\$400.00	
Reserve (Lansford & Stephens Tax Bill - 2017 Tax Form Prep.)	\$33.33	
Reserve (TDEC Fees)	\$275.00	
Reserve (Volunteer Electric Service)	\$600.00	
Reserve (MicroBac)	\$134.00	
Reserve (Repair)	<u>\$500.00</u>	
<b>Total Liabilities</b>		<b><u>\$21,134.82</u></b>
<b>Surplus (Deficit)</b>		<b>-\$1,152.83</b>

\* Only current assets are included. This balance sheet does not reflect fees previously taxed to the Tennessee Regulatory Authority on an interim basis.

## Cash Flow Projected for June 2017

<b>Starting Balance (5/31/2017)</b>		<b>\$13,399.28</b>
Projected Receipt of March 2017 RMI & Sinor F&E from TPUC	\$4,285.38	
Projected Deposits in June 2017	<u>\$11,800.00</u>	
Current Assets PLUS Projected Cash Inflows		\$29,484.66
CNA Insurance	\$1,148.66	
Crab Orchard Utility District	\$3,400.00	
Volunteer Electric Cooperative	\$600.00	
Gerald Williams	\$750.00	
Lansford & Stephens	\$300.00	
R&R Asphalt Grading	\$2,800.00	
March 2017 F&E RMI & Sinor	<u>\$4,920.74</u>	
Projected Cash Outflows		<u>\$13,919.40</u>
<b>Projected Ending Balance (6/30/2017)</b>		<b>\$15,565.26</b>

**LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP  
SUMMARY TIME SHEET - RECEIVER'S FEES  
(as modified by the currently projected deficit)**

<u>Jeanne Barnes Bryant</u>	
April 2017 Fees	\$283.10
April 2017 Overhead Expense	\$26.60
<u>Receivership Management, Inc.</u>	
April 2017 Fees	\$2,811.75
April 2017 Overhead Expense	\$353.50
April 2017 Expenses	\$70.90
<u>Everett Sinor</u>	
April 2017 Fees & Expenses	<u>\$2,775.90</u>
RMI, Bryant & Sinor Fees and Expenses Total	\$6,321.75
MINUS Current Deficit (as of 5/31/2017)	<u>\$1,152.83</u>
<b>Proposed Payment out of Receivership Estate</b>	<b>\$5,168.92</b>
<u>Graham Matherne</u>	
April 2017 Fees & Expenses	\$2,025.00
PLUS Current Deficit (as of 5/31/2017)	<u>\$1,152.83</u>
<b>Proposed Interim Taxation of Costs</b>	<b>\$3,177.83</b>



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		April 2017
4/3/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE FEBRUARY REPORT, REVIEW SAME, EMAIL TO ROB MOORE RE SAME 0.2 \$163.00 \$32.60
4/4/2017	Jeanne Barnes Bryant	UPDATE RE STATUS FROM ROB MOORE, QUESTION RE AFFIDAVIT 0.2 \$163.00 \$32.60
4/5/2017	Jeanne Barnes Bryant	DISCUSSION RE TAXES 0.1 \$163.00 \$16.30
4/7/2017	Jeanne Barnes Bryant	DISCUSSION WITH CODY SMITH RE REPORT ON TAXES, DISUSSION WITH ROB MOORE RE STATUS ON CONDEMNATION, QUESTION RE INVOICES, REVIEW AND SIGN CHECKS 0.5 \$163.00 \$81.50
4/11/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS, QUESTION RE TAXES, REVIEW INFORMATION ON TAX FILING 0.3 \$163.00 \$48.90
4/13/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS 0.1 \$163.00 \$16.30
4/17/2017	Jeanne Barnes Bryant	REVIEW AND SIGN CHECKS, EMAIL FROM COUNSEL RE FILING, QUESTION RE CHECKS 0.2 \$163.00 \$32.60
4/18/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE CONTINUING HEARING, REVIEW ORDER 0.2 \$163.00 \$32.60
4/20/2017	Jeanne Barnes Bryant	EMAIL RE STEVENS QUESTION 0.1 \$163.00 \$16.30
<b>Total</b>		<b>\$309.70</b>



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

Invoice for Professional Services

**LAUREL HILLS WATER DISTRICT** **April 2017**

Date	Service Provider	Description of Services	Hours	Rate	Total
4/3/2017	Anna M. Hunter	UPDATE REGISTER & RECONCILE BANK ACCOUNT AS OF 3/30/2017. EMAIL TO E. SINOR REGARDING BANK RECONCILIATION. PROVIDE COUD INVOICES TO E. SINOR.	0.6	\$50.00	\$30.00
4/3/2017	Robert E. Moore, Jr.	LEAVE 1101 KERMIT DRIVE NASHVILLE FOR MEETING WITH COUD CROSSVILLE. MEETING WITH COUD REPRESENTATIVES 4.0; MEETING WITH G. WILLIAMS RE: INSPECTION OF SUPPLY PIPE REPAIRS, PAST DUE CUSTOMER LOCATIONS, POTENTIAL PIPE BREAKS IN ADJOINING AREAS 2.5; REVIEW OF INFORMATION FROM COUD MEETING WITH E.SINOR 1.5; RETURN TRAVEL TO NASHVILLE 2.0	10	\$153.00	\$1,530.00
4/4/2017	Anna M. Hunter	RECORD FEES AND EXPENSES FOR MARCH 2017.	0.2	\$50.00	\$10.00
4/4/2017	Cody Smith	DISCUSSION WITH R. MOORE RE COUD MEETING AND SET UP FOR TY 2017 TAXES.	0.8	\$123.00	\$98.40
4/4/2017	Robert E. Moore, Jr.	UPDATE FROM C.SMITH RE: FINANCIALS, REVIEW AND APPROVE 14TH REPORT, UPDATE DISCUSSION WITH J.BRYANT 2; CALL WITH E.SINOR RE: TELECONFERENCE WITH TRA OFFICIALS 1.0; REVIEW AND RESPOND TO EMAIL RE: STEPHENS INVOICE QUESTIONS 1.0	0.4	\$153.00	\$61.20
4/5/2017	Cody Smith	DISCUSS FILINGS WITH E. SINOR AND R.MOORE RE CURRENT COURT REPORT AND TY 2017 TAX RETURN.	0.3	\$123.00	\$36.90
4/5/2017	Robert E. Moore, Jr.	REVIEW AND APPROVE TERRY STEPHENS INVOICE 1.0; DISCUSSION WITH C.SMITH AND J.BRYANT RE: CASH FLOW ANALYSIS, TAX ISSUES 2.5; UPDATE CALL FROM E.SINOR RE: TRA CALL AND BILLINGS FROM T.STEPHENS 2.5	0.6	\$153.00	\$91.80
4/6/2017	Cody Smith	CALL T. STEPHENS OFFICE RE TAX RETURN ACCRUAL VS. CASH BASIS. PROVIDE RECONCILIATION JUNE 2016 - DEC 2016. UPDATE TRIAL BALANCE WITH FEE & EXP ACCRUAL FOR COMPARISON.	1.9	\$123.00	\$233.70

Thursday, May 18, 2017

**LAUREL HILLS WATER DISTRICT**

**April 2017**

Date	Name	Description	Hours	Amount
4/7/2017	Cody Smith	DISCUSSION ON COMPANY TAX FILINGS CONVERSATION WITH T. STEPHENS OFFICE AND TAX PYMT FOR TY2016 FILING.	0.6	\$123.00
4/7/2017	Jere P. Cowan	PROCESS EXPENSE PAYMENT; UPDATE RECORDS RE: SAME	0.4	\$50.00
4/7/2017	Robert E. Moore, Jr.	REVIEW EMAIL RE: TRA MEETING, UPDATE FROM C.SMITH RE: BILLING .10	0.1	\$153.00
4/10/2017	Anna M. Hunter	RECORD FEES AND EXPENSES AS OF 3/31/2017.	0.2	\$50.00
4/10/2017	Jere P. Cowan	RECEIPT MATERIALS FROM REGIONS	0.1	\$50.00
4/11/2017	Cody Smith	REVIEW TY2016 FILING FINANCIALS. PHONE CALL WITH TERRY STEPHENS CPA RE TY2016 TAX RETURN P&L.	0.6	\$123.00
4/11/2017	Jere P. Cowan	RECEIPT EXPENSE PAYMENTS; PROCESS AND FORWARD SAME; TRAVEL TO REGIONS UPDATING SAME	0.8	\$50.00
4/11/2017	Jere P. Cowan	RECEIPT RETURNED INVOICES FROM T. STEPHENS OFFICE; EMAIL R. MOORE AND T STEPHENS OFFICE RE: SAME	0.2	\$50.00
4/11/2017	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: DRAFT IRS RETURN RPORTING .25; CONFERENCE CALL WITH TRA RE: PROJECTED EXPENSES AND SHORTFALLS .6; EMAIL TO E.SINOR RE: REVISED LANGUAGE IN REPORT, RETURN TO SENDER MAIL .10	0.95	\$153.00
4/12/2017	Cody Smith	EMAIL T. STEPHENS FINALLY CHANGES FOR TY2016 FILINGS AND APPROVE EXTENSION.	0.3	\$123.00
4/13/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 03-31-17. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE COURT REPORT EXHIBITS.	0.5	\$123.00
4/13/2017	Robert E. Moore, Jr.	CALL WITH KENT LATHAM RE: PAST DUE NOTICE CURRENT ABILITY TO PAY, UPDATE EMAIL TO E.SINOR RE: SAME .4	0.4	\$153.00
4/14/2017	Robert E. Moore, Jr.	EMAIL AND CALL WITH E.SINOR RE: ACTIVITY REPORT .2	0.2	\$153.00
4/17/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE THROUGH MARCH WITH E. SINOR.	0.3	\$123.00
4/17/2017	Jere P. Cowan	FINALIZE R. MOORE AFFIDAVIT; RECEIPT AND PAYMENT OF EXPENSES; FORWARD SAME; CONFERENCE WITH E. SINOR RE: AFFIDAVIT;	0.6	\$50.00

Thursday, May 18, 2017

Page 2 of 3

**LAUREL HILLS WATER DISTRICT** **April 2017**

Date	Name	Description	Hours	Amount
4/17/2017	Robert E. Moore, Jr.	EMAIL WITH C.SMITH RE: MICROBAC INVOICE .10	0.1	\$153.00
4/18/2017	Cody Smith	EMAIL R. MOORE LAST INVOICE PAID FOR MICROBAC.	0.2	\$123.00
4/18/2017	Jere P. Cowan	PREPARATION OF FINANCIAL EXHIBITS FOR STATUS REPORTING	0.2	\$50.00
4/18/2017	Robert E. Moore, Jr.	UPDATE FROM E.SINOR RE: CONSTINUED HEARING. PAYMENT OF T.STEVEN INVOICE .10; REVIEW RECOMMENDED SERVICE TERMINATIONS AND APPROVE .2	0.3	\$153.00
4/19/2017	Anna M. Hunter	PROVIDE NET ASSETS & INVOICES AS OF 3/31/2017 TO E. SINOR FOR COURT REPORT. PHONE CALL WITH K. LATHAM REGARDING WATER BILL PAYMENTS	0.5	\$50.00
4/20/2017	Cody Smith	EMAIL E. SINOR VERIFICATION ON DEPOSIT AMOUNT FOR WATER DEPOSIT ON CONDO SOLD.	0.3	\$123.00
4/20/2017	Robert E. Moore, Jr.	REVIEW RECOMMENDATIONS FROM E.SINOR RE: NEW ACCOUNT TRANSFER AND REFUND RE: EAGLES NEST; REVIEW ADDITIONAL EMAILS FROM G.MATHERNE AND E.SINOR RE: LITIGATION .10	0.1	\$153.00
4/21/2017	Robert E. Moore, Jr.	LITIGATION CONFERENCE CALL WITH G.MATHERNE AND E.SINOR .7; UPDATE FROM C.SMITH RE: ACCOUNTING .10	0.8	\$153.00
4/24/2017	Jere P. Cowan	RECEIPT LETTER FROM RESIDENT RE: WATER CHARGES AND ISSUES; CONFERENCE WITH R. MOORE RE: SAME; EMAIL E. SINOR SENDING SAME	0.3	\$50.00
4/25/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. ESTABLISH PAYOUT OF LIABILITY THROUGH CURRENT COURT APPROVALS.	0.3	\$123.00
4/26/2017	Jere P. Cowan	RECEIPT AND PROCESSING EXPENSE PAYMENTS; FORWARD SAME	0.4	\$50.00
4/26/2017	Robert E. Moore, Jr.	UPDATE FROM E.SINOR RE: CONTINUED HEARING AND POSSIBLE TRIAL DATES REPLY TO SAME, UPDATE ON TRA MEETING .2	0.2	\$153.00
4/27/2017	Jere P. Cowan	PROCESS PLAN EXPENSES; POST AND UPDATE FINANCIAL RECORDS RE: SAME; FORWARD SAME	0.5	\$50.00

**Total** **\$3,165.25**

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

May 1, 2017

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

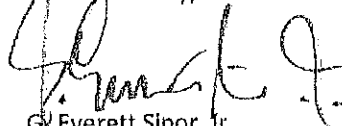
*RE: April 2017 Billings – RMI/Laurel Hills Water System in Receivership*

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>
4/2/2017	Meeting w R Moore to discuss Crossville trip and other LHWS issues	1.2		
4/3/2017	Travel to Crossville; meeting w E Bolin & G Williams; discussion w R Moore; travel to Renegade Mtn.; mtg w G Williams to view supply pipe leak, potential cut offs; travel to Nashville	10.0		
4/4/2017	Email from Lansford & Stephens w invoices; T.C. w R Moore; voicemail for K Cashman-Grams; email to K Cashman-Grams w 14th report; response to Heather @ L&S re Bazlari inquiry	0.4		
4/5/2017	T.C. w C Smith and email review re bank statement for February and 14th report; T.C. w A Conklin & K Cashman-Grams re Crab Orchard trip; T.C. w R Moore re same; review of C Smith email re bank statement	0.5		
4/7/2017	Respond to K Cashman-Grams request for meeting; review G Matherne email; review K Cashman-Grams email on conference call	0.1		
4/10/2017	J Moore email on work on water pipe, and response	0.1		
4/11/2017	T.C. w R Moore; email to K Cashman-Grams; conf. call w J Shirley, D Foster, K Cashman-Grams, R Moore & A Conklin re 14th report; V.M. for J Moore re email inquiry; T.C. w G Williams and email to G Williams re same; emails to Heather w Lansford & Stephens and email w R Moore re returns; T.C. w R Moore re tax return; email re 2 returned letters w Heather	1.7		
4/12/2017	Review of order of non-suit of customer intervenors; forward same to G Matherne & R Moore; review of email from J Reeves re Bazlari property, and response	0.1		
4/13/2017	Review R Moore email re Mr. Latham and his past due bill	0.1		
4/14/2017	communication w R Moore by text and phone call re affidavit; response to R Moore to his notes of Latham phone call; forward same to G Williams with notes	0.2		
4/17/2017	Review A Conklin email to G Matherne on service areas of LHWS & COUD; completion and submission of 14th report	0.7		
4/18/2017	Review of R Moore email on MicroBac bill & C Smith response; A Conklin email on continuance of hearing; forward same to R Moore & G Matherne; G Williams email on grading work & Mr. Latham shut off; email from Heather @ Lansford & Stephens re A/R; email to Gerald Williams & R Moore re cut off information; email to Heather re deposits; email to R Moore re: Lansford & Stephens contract	0.6		

4/19/2017	court reporter emails from A Conklin & S Hall; A Conklin email re 2nd notice of delinquency and conveyance docs; response to same; review of G Matherne response to same; K Cashman-Grams email inquiry re Cumberland Pointe billing and cutoffs, and response to same; email from G Matherne forwarding follow up email to S Hall & R Schwerer on answer extension; T.C. w G Matherne re conveyance documents	0.5		
4/20/2017	Email from G Williams re grading work & new owners; forward same to Heather @ L&S; email from G Matherne re motions to dismiss; review J Schemmel email re Eagles nest deposit; review Eagles Nest docs; forward email to R Moore w recommendation; G Matherne email on conf. call; review of A Conklin & S Hall emails re continuance; R Moore email on Eagles Nest; email to J Schemmel; emails to C Smith & Heather @ L&S; email to C Smith re grading invoice	1.3		
4/21/2017	T.C. w G Matherne & R Moore re LHWS, TRA and Moy Toy; T.C. w K Cashman-Grams re meeting	1.0		
4/25/2017	Read customer letter; respond to J Cowan & R Moore re same; T.C. w R Moore re same; email confirmation on meeting; email from D Carter w Cumberland Pointe HOA	0.2		
4/26/2017	Response to D Carter w report	0.1		
4/28/2017	Email to M Hargis re liability policy renewal; email to R Moore w recommendation on paving; email from K Johnston w AJG; response to same	<u>0.2</u>		
	<b>Hourly Billing Total</b>	<b>19.0</b>	<b>\$140.00</b>	<b>\$2,660.00</b>
		<u>Miles</u>	<u>Rate</u>	
4/3/2017	Nashville to Crossville to Crab Orchard to Nashville	<u>246.6</u>		
	<b>Mileage Total</b>	<b>246.6</b>	<b>\$0.47</b>	<b>\$115.90</b>
	<b>Other Expenses Reimbursable Total</b>			<u>\$0.00</u>
	<b>Balance Owed this month</b>			<b>\$2,775.90</b>
	Previous Balance Owed		\$7,400.73	
	<b>Total Amount Due and Payable</b>			<b>\$10,176.63</b>

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

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

MAY 8, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1035227

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 APRIL 30, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$2,025.00
TOTAL THIS INVOICE	\$2,025.00
PREVIOUSLY BILLED AND OUTSTANDING	\$13,489.96
TOTAL AMOUNT DUE	\$15,514.96

=====

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

MAY 8, 2017  
008264.000036  
J. GRAHAM MATHERNE

INVOICE # 1035227

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 APRIL 30, 2017

04/12/17	REVIEW ORDER DISMISSING CONSUMER INTERVENORS FROM TRA CASE. J. GRAHAM MATHERNE .10 hours at 270.00 per hour.	27.00
04/17/17	E-MAILS WITH COUNSEL REGARDING UNDERLYING FACTS AND ISSUES RELATED TO CASE. J. GRAHAM MATHERNE .30 hours at 270.00 per hour.	81.00
04/19/17	E-MAILS WITH COUNSEL REGARDING PENDING MATTERS AND STATUS ISSUES (.40); REVIEW DOCUMENTS REGARDING SAME (30); E-MAILS WITH SINOR AND MOORE AND TELEPHONE CONFERENCE WITH SINOR REGARDING SAME (.10); E-MAIL TO HALL AND SCHWERER REGARDING ANSWER TO CONDEMNATION ACTION/MOTION TO DISMISS (.30); E-MAILS WITH COUNSEL REGARDING SAME (.40). J. GRAHAM MATHERNE 1.50 hours at 270.00 per hour.	405.00
04/20/17	INITIAL REVIEW OF TERRA MOUNTAIN AND MOY TOY MOTIONS TO DISMISS (.40); E-MAILS WITH COUNSEL AND CLIENT REGARDING SAME AND REGARDING OPEN ISSUES (.60). J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour.	270.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.  
MATTER NUMBER: 008264.000036  
INVOICE NO.: 1035227

04/21/17 LENGTHY TELEPHONE CONFERENCE WITH R. MOORE AND  
E. SINOR REGARDING STATUS ISSUES AND RELATED  
MATTERS (.70); E-MAILS FROM SINOR REGARDING  
SAME (.20).  
J. GRAHAM MATHERNE .90 hours at 270.00 per hour. 243.00

04/28/17 FILE REVIEW AND ORGANIZATION AS TO TOPICS IN  
CONDEMNATION ACTION AND STRATEGIES REGARDING  
SAME.  
J. GRAHAM MATHERNE .50 hours at 270.00 per hour. 135.00

04/29/17 FILE REVIEW AS TO LHWS AND ISSUES RELATING TO  
ITS BEING WATER PROVIDER AND ITS GAINING OF  
RIGHTS; FURTHER REVIEW AS TO RESTRICTIONS AND  
EASEMENTS AND RELATED MATTERS, FURTHER FILE  
ORGANIZATION IN PREPARATION FOR MEETING.  
J. GRAHAM MATHERNE 3.20 hours at 270.00 per hour. 864.00

	-----		
TOTAL SERVICES	7.50		\$2,025.00
	-----		
TOTAL THIS INVOICE			\$2,025.00
			-----
PREVIOUSLY BILLED AND OUTSTANDING			\$13,489.96
			-----
TOTAL AMOUNT DUE			\$15,514.96
			=====

*-----TIME AND FEE SUMMARY-----*			
		RATE	HOURS
*-----TIMEKEEPER-----*			FEES
J MATHERNE	PARTNER	270.00	7.50
			2025.00

RMI EXP RECOVERABLE LHWD  
4/1/17 Through 4/30/17

Category Description	4/1/17- 4/30/17	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-283.10	-283.10
5610-CONTRACT LABOR RMI	-2,811.75	-2,811.75
5690-RMI OH EXPENSE	-380.10	-380.10
TOTAL 5100 FEES RMI	-3,474.95	-3,474.95
5150 FEES LEGAL		
5400-LEGAL FEES	-4,800.90	-4,800.90
TOTAL 5150 FEES LEGAL	-4,800.90	-4,800.90
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-4.10	-4.10
6210-POSTAGE	-3.74	-3.74
6222-TELEPHONE LONG DISTANCE	-27.60	-27.60
TOTAL 5300 EXPENSES	-70.90	-70.90
OVERALL TOTAL	-8,346.75	-8,346.75

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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

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AFFIDAVIT OF KELLY CASHMAN-GRAMS

---

STATE OF TENNESSEE     )  
  )  
COUNTY OF DAVIDSON    )

COMES NOW, Kelly Cashman-Grams, after being duly sworn, state as follows:

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

2. I am the General Counsel for the Tennessee Public Utility Commission in this matter. Pursuant to Tennessee law, the Tennessee Public Utility Commission took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.

EXHIBIT  
G

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 April 1, 2017 through April 30, 2017 that are contained in this filing.

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

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

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

*[intentionally blank]*

7. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court (a) authorize payment to the Receiver out of receivership estate assets as requested by the Receiver; and (b) order payment of fees and expenses as an interim taxation of costs in this matter as requested by the Receiver.

**FURTHER THE AFFIANT SAITH NOT.**

Kelly Cashman Grams  
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

30<sup>th</sup> day of June, 2017.

Reck Lefess  
NOTARY PUBLIC

My commission expires: 1/9/2018



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560  
Chancellor Thurman

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AFFIDAVIT OF ROBERT E. MOORE, JR.

---

STATE OF TENNESSEE        )  
  )  
COUNTY OF DAVIDSON        )

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

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

2. I am the Chief Operations Officer of Receivership Management, Inc., the Receiver appointed in this action by the Court at the request of the Tennessee Public Utility Commission. In that capacity, I have reviewed and approved the administration of the Laurel Hills Water System ("LHWS") from the date of the Order Appointing Receiver entered by this Court on October 26, 2015.

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

EXHIBIT  
H

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

4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide services on this receivership. The fees and expenses were necessary for the work provided and are not duplicative or excessive. I believe the fees presented for approval are fair, reasonable and proper for the services provided. I have also determined that the rates charged by these individuals for the services provided are either at a discounted or market rate for their area.

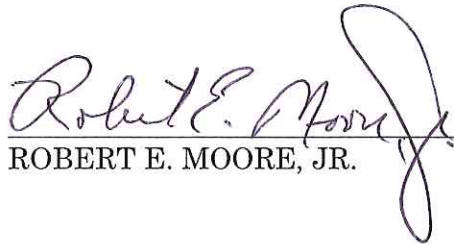
5. Therefore, I believe that all fees and expenses presented for approval contained in this filing are fair, reasonable and proper for the necessary services provided.

*[intentionally blank]*




6. Based upon an initial review of financial documentation for LHWS, it appears that there are NOT 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 as calculated on a modified accrual basis. 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 \$5168.92, and that the Court order an interim taxation of costs to the Tennessee Public Utility Commission in the amount of \$3177.83 (the amount needed to erase the current deficit of the receivership estate as estimated by the Receiver).

FURTHER THE AFFIANT SAITH NOT.

  
ROBERT E. MOORE, JR.

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

  
Notary Public  
Commission Expires: 1/6/2020



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

TENNESSEE PUBLIC UTILITY COMMISSION

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

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 July, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for April 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 \$8346.75.

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

- (1) payment to the Receiver in the amount of \$5168.92 from the assets of the Laurel Hills Water System in Receivership is hereby **AUTHORIZED**; and,
- (2) **COSTS ARE TAXED** on an interim basis to the Plaintiff, the Tennessee Public Utility Commission, in the amount of \$3177.83.

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

---

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:

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

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

Attorney at Law

Counsel for Receivership Management, Inc.

3504 Robin Road

Nashville, Tennessee 37204

615.969.9027

Everett.Sinor@gmail.com

Certificate of Service

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

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

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

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

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

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

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

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

---