

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

RECEIVER'S FOURTEENTH 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 Fourteenth 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 Thirteenth 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.

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, tenth, eleventh, twelfth and thirteenth 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 and February 28, 2017, respectively.

5. As previously reported, a February 21, 2017 global mediation session was conducted, with Judge John Turnbull serving as mediator. Six (6) distinct entities participated in that global mediation session, consisting of: (1) Laurel Hills Water System in Receivership; (2) the Tennessee Regulatory Authority; (3) the Consumer Advocate and Protection Division of the Office of the Tennessee Attorney General and Reporter; (4) Laurel Hills Condominiums Property Owners' Association; (5) Moy Toy, LLC; and (6) Terra Mountain Holdings, LLC. That mediation attempt was unsuccessful as the participating entities reached an impasse.

6. Since the failed 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.

Operations and Other Activities of the Receiver

7. The Receiver sent first notices of delinquency to chronic non-paying LHWS customers with the March 2017 billing statements (giving 30 days to pay the delinquent bill). This resulted in numerous past due bills being paid up, as reported below. A second and final notice of delinquency has been sent to chronic non-paying LHWS customers with the April 2017 billing statements (giving the delinquent customer 15 days to pay their outstanding balance). Water service cut-offs, if any, will conform with applicable law, specifically Tenn. Comp. R. & Regs., tit. Tennessee Regulatory Authority, ch. 1220-4-3. A copy of the "FINAL NOTICE REGARDING UNPAID WATER BILL" that the Receiver has sent to chronic non-paying customers with the April 2017 billing statements is attached hereto as Exhibit A and is incorporated herein by reference.

8. In March of 2017, 99 of the 131 customers of the LHWS timely paid their water bill. Of the 32 non-paying customers, 22 are in the Cumberland Pointe condominium units, and 10 are located elsewhere on Renegade Mountain. All 22 Cumberland Pointe

condominium unit non-paying customers have failed to pay their water bill for two (2) or more months. As to non-Cumberland Pointe condominium unit owners, 6 customers have failed to pay their water bill for two (2) or more months.³

9. Just this past week, a leak was discovered on the main supply line. As reported by the LHWS's contract engineer, Mr. Gerald Williams, the leak was a 3 inch break/crack on the bottom of the pipe that Mr. Williams estimates was leaking 6000 gallons per day. The leak was on the exposed portion of the supply pipe around 50 feet from the top of the exposed pipe portion near the top of the mountain. Mr. Williams fixed the leak by securing a wraparound clamp on the break/crack, and he further indicates that this should be a good permanent fix for this leak. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

10. The Receiver understands that all parties are preparing for the hearing in this Honorable Court currently scheduled to take place on Monday, May 15, 2017 at 1:00 p.m., with continuation of the hearing on Tuesday, May 16, 2017 at 9:00 a.m. if necessary.

Current Financial Information

11. As of March 28, 2017, there was an accounts receivable past due balance of \$25,631.72.⁴ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit B and is incorporated herein by reference.

12. On a cash basis, the LHWS had a net gain in February, 2017 of \$3738.09.⁵ See Exhibit C, attached hereto and incorporated herein by reference. As of March 30, 2017,

³ This is a significant improvement over the previous month, in which there were 43 non-paying customers, 34 of which were chronic non-payers. See the Receiver's Thirteenth Report, filed February 28, 2017, ¶ 6.

⁴ Of this amount, \$3655.92 is less than a month past due, and \$21,975.80 is more than a month past due. This past due amount excludes balances owed prior to the institution of the new monthly rate of \$114.24. See Exhibit B.

⁵ This is somewhat misleading, as this merely shows the LHWS's profit on a cash basis in January of 2017. On an accrual basis, the LHWS currently has a deficit, which is discussed further, infra.

the LHWS had a cash balance of \$7804.81 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 February and March of 2017.⁶

Current Modified Accrual Basis Financial Documents & Current Estimated Deficit

13. 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 when the current rate was proposed. The Receiver now estimates that a break-even point for the Receiver's monthly fees and expenses is approximately \$4850.00.

14. Given the concerns of the Receiver as to the ability of the LHWS to (a) meet current obligations, and (b) sustain itself financially long term, 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 March 30, 2017; and (3) a cash flow statement showing projected cash flows for the month of April, 2017.

15. For purposes of generating a monthly income statement and budget, a \$500.00 repair reserve was established, and an estimate of \$6000.00 per month was used for Receivership Management, Inc.'s and Mr. Sinor's fees and expenses. At its current rate

⁶ 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 Authority, which amount to \$89,493.23 (the amount taxed to the Authority prior to the July 1, 2016 increase in rates), AS WELL AS significant additional amounts taxed to the Authority to reflect Mr. Matherne's fees and expenses.

of \$114.24 per month, the Receiver estimates that the LHWS will lose \$1145.09 per month.⁷ 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 a \$5924.66 deficit as of March 30, 2017. The cash flow statement shows the LHWS losing almost half of its cash in the month of April, 2017, with the Receiver's cash projection being reduced to \$3980.25 as of April 30, 2017.

16. To rectify the currently projected deficit of \$5924.66, the Receiver proposes that this amount be taxed on interim basis to the Tennessee Regulatory Authority 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 Tennessee Regulatory Authority are delineated below.

Fees and Expenses of Receiver

17. 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

18. 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

⁷ See Collective Exhibit E. This does not include Mr. Matherne's fees and expenses, which have always been taxed on an interim basis to the Tennessee Regulatory Authority by this Honorable Court, and which the Receiver presumes will continue to be so taxed for the distant future.

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

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 February 1, 2017 through February 28, 2017 in the amount of \$3610.91.⁹ 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 F for the period February 1, 2017 through February 28, 2017 in the amount of \$5090.73. 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 February 1, 2017 through February 28, 2017 in the amount of \$10,223.19.

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

20. 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 February of 2017: \$3610.91; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for February of 2017: \$5090.73; and,

⁹ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of February 1, 2017 through February 28, 2017, which total \$456.46.

- c. Invoice for Mr. Matherne working under Mr. Moore for February of 2017:
\$10,223.19.

21. As referenced above, the Receiver projects that there is a \$5924.66 deficit in the LHWS as of March 30, 2017. Typically, Mr. Matherne's fees and expenses for the previous month are sought to be taxed on interim basis to the Tennessee Regulatory Authority, 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 \$5924.66 to the amount taxed on an interim basis to the Tennessee Regulatory Authority.¹⁰

22. 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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¹⁰ 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 \$18,924.83, 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 \$2776.98 (constituting all fees and expenses save Mr. Matherne's minus the projected deficit as of March 30, 2017); and (b) tax costs to the Authority on an interim basis in the amount of \$16,147.85 (constituting the amount of Mr. Matherne's fees and expenses plus the projected deficit as of March 30, 2017).

DATED: April 17, 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)

Certificate of Service

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

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

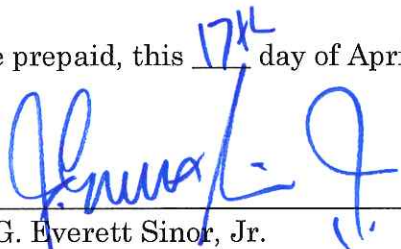
James L. Gass, Esq.
Ogle, Gass & Richardson
Counsel for Laurel Hills Condominiums
Property Owners Association
103 Bruce Street
Sevierville, Tennessee 37862

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

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 17th day of April, 2017.



G. Everett Sinor, Jr.

Receivership Management, Inc.

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

FINAL NOTICE

REGARDING UNPAID WATER BILL

Name
Address
City, State, ZIP

Re: Unpaid Water Bill
Service Address: _____

Dear *Name*:

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

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

Unless the entire balance is paid by **April 15, 2017**, your water service will be terminated. Your water service will not be reactivated until the entire past due balance is paid in full. As Renegade Mountain is a resort community, all properties tapped into the water system are required to make monthly payments for water service regardless of usage. **Although your water service will be terminated, your obligation to make monthly payments remains in full force and effect so long as your property is developed and has access to the water system.**

You may pay your bill by mailing your check to:

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

You may also pay in person at:

Lansford & Stephens CPA
92 Rockwood Ave
Crossville, Tennessee 38555

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



5:56 PM

03/28/17

Laurel Hills Water System In Receivership
A/R Aging Summary
As of March 28, 2017

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	610.44	953.16
BRASSELL, CRYSTAL	0.00	0.24	0.00	0.00	0.00	0.24
CPCA (84)	0.00	2,513.28	2,513.28	2,513.28	13,937.28	21,477.12
HEIRS, LUKE & ANNA DUNN	0.00	114.24	114.24	0.00	0.00	228.48
JUDD, JONATHAN	0.00	114.24	2.48	0.00	0.00	116.72
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	228.48	571.20
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	228.48	571.20
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	228.48	571.20
MCQUEEN, DARRELL E	0.00	114.24	0.00	0.00	0.00	114.24
RIFNER, DAVE	0.00	114.24	0.00	0.00	0.00	114.24
ROBINSON, CARL	0.00	114.24	0.00	0.00	0.00	114.24
TOTAL	0.00	3,655.92	3,201.20	3,084.48	15,690.12	25,631.72

EXHIBIT
B

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

	FOR THE PERIOD		
	10/26/2015 1/31/2017	2/1/2017 2/28/2017	10/26/2015 2/28/2017
RECEIPTS			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	118,851.13	12,290.15	131,141.28
TOTAL REVENUE	<u>118,851.13</u>	<u>12,290.15</u>	<u>131,141.28</u>
DISBURSEMENTS			
FEEES			
5695-ACCOUNTING FEES	3,200.00	600.00	3,800.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
TOTAL FEES	<u>5,594.56</u>	<u>600.00</u>	<u>6,194.56</u>
OTHER EXPENSES:			
5697-OTHER FEES	3,850.00	1,600.00	5,450.00
5930-TAXES	1,692.26	-	1,692.26
6060-RENT	-	-	-
6190-EQUIPMENT MAINTENANCE	349.78	-	349.78
6215-COPIES POSTAGE & SHIPPING	130.00	-	130.00
6220-TELEPHONE & INTERNET	-	-	-
6230-OFFICE SUPPLIES	45.58	-	45.58
6250-PRINTING	-	-	-
6260-STORAGE	-	-	-
6270-MOVING EXPENSE	-	-	-
6290-UTILITIES	55,041.66	5,082.03	60,123.69
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE	15,226.00	1,270.03	16,496.03
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	<u>76,954.56</u>	<u>7,952.06</u>	<u>84,906.62</u>
TOTAL EXPENSES	<u>82,549.12</u>	<u>8,552.06</u>	<u>91,101.18</u>
NET RECEIPTS LESS DISBURSEMENTS	<u>36,302.01</u>	<u>3,738.09</u>	<u>40,040.10</u>
SCHEDULE OF CHANGE IN NET ASSETS			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	36,302.01	3,738.09	40,040.10
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	<u>36,402.01</u>		<u>40,140.10</u>
3/20/2017 12:46			
TOTAL ASSETS	12,569.84		16,307.93
TOTAL LIABILITIES	<u>23,832.17</u>		<u>23,832.17</u>
NET ASSETS	<u>36,402.01</u>		<u>40,140.10</u>

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



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

3/30/2017

OPERATING BANK ACCOUNT

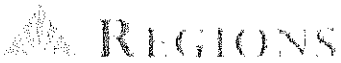
	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	8,116.81	6,776.65
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(300.00)	
DEPOSIT MADE ON 3/29/17		1,028.16
	<u>7,804.81</u>	<u>7,804.81</u>

30-Mar-17
11:28 AM

OUTSTANDING CHECKS		
LANSFORD & STEPHENS	1086	300.00
		<u>300.00</u>

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 2

LIFEGREEN BUSINESS CHECKING
 February 1, 2017 through February 28, 2017

SUMMARY

Beginning Balance	\$9,900.61		Minimum Balance	\$7,188
Deposits & Credits	\$12,290.15	+	Average Balance	\$11,204
Withdrawals	\$0.00	-		
Fees	\$0.00	-		
Automatic Transfers	\$0.00	+		
Checks	\$15,002.01	-		
Ending Balance	\$7,188.75			

DEPOSITS & CREDITS

02/01	Deposit - Thank You	685.71
02/07	Deposit - Thank You	456.96
02/13	Deposit - Thank You	228.48
02/13	Deposit - Thank You	2,351.00
02/15	Deposit - Thank You	7,768.32
02/22	Deposit - Thank You	799.68
Total Deposits & Credits		\$12,290.15

CHECKS

Date	Check No.	Amount	Date	Check No.	Amount
02/02	1071	1,270.03	02/14	1076	300.00
02/13	1073 *	1,600.00	02/23	1078 *	6,967.08
02/07	1074	300.00	02/24	1079	3,857.21
02/06	1075	707.69			
Total Checks					\$15,002.01

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

Date	Balance	Date	Balance	Date	Balance
02/01	10,586.32	02/13	9,745.04	02/23	11,045.96
02/02	9,316.29	02/14	9,445.04	02/24	7,188.75
02/06	8,608.60	02/15	17,213.36		
02/07	8,765.56	02/22	18,013.04		

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

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

**For all your banking needs, please call 1-800-REGIONS (734-4667)
or visit us on the Internet at www.regions.com (TTY/TDD 1-800-374-5791).**

Thank You For Banking With Regions!

Estimated Monthly Income Statement - LHWS

Income

Average Deposits	<u>\$11,800.00</u>	
Average Income		\$11,800.00

Expenses

CNA Insurance	\$1,270.09	
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>	
Average Expenses		\$12,945.09
Projected Monthly Income (Deficit)		-\$1,145.09



LHWS Balance Sheet (as of 3/30/2017) - Modified Accrual Basis*

Current Assets

Cash	<u>\$7,804.81</u>	
Total Current Assets		\$7,804.81

Liabilities

Lansford & Stephens (March Billing)	\$300.00	
Gerald Williams (March Billing)	\$750.00	
February 2017 F&E RMI & Sinor	\$8,679.47	
March 2017 F&E RMI & Sinor (estimated)	<u>\$4,000.00</u>	
Total Liabilities		<u>\$13,729.47</u>
Surplus (Deficit)		-\$5,924.66

* 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 April 2017

Starting Balance (3/30/2017)	\$7,804.81	
Projected Deposits in April 2017	<u>\$11,800.00</u>	
Current Assets PLUS Projected Deposits		\$19,604.81
CNA Insurance (Reserve ONLY)	\$1,270.09	
COUD	\$3,400.00	
VEC	\$600.00	
Gerald Williams	\$750.00	
L&S - (\$33.00 is a reserve for tax services)	\$333.00	
TDEC (Reserve ONLY)	\$25.00	
MicroBac (Reserve--Paid Quarterly)	\$67.00	
Repairs (Reserve ONLY)	\$500.00	
February 2017 F&E RMI & Sinor	<u>\$8,679.47</u>	
Projected Cash Outflows		<u>\$15,624.56</u>
Projected Ending Balance (4/30/2017)		\$3,980.25

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

Jeanne Barnes Bryant

February 2017 Fees	\$178.80
February 2017 Overhead Expense	\$16.80

Receivership Management, Inc.

February 2017 Fees	\$2,975.65
February 2017 Overhead Expense	\$393.40
February 2017 Expenses	\$46.26

Everett Sinor

February 2017 Fees & Expenses	<u>\$5,090.73</u>
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RMI, Bryant & Sinor Fees and Expenses Total	\$8,701.64
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MINUS Current Deficit (as of 3/30/2017)	<u>\$5,924.66</u>
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Proposed Payment out of Receivership Estate	\$2,776.98
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Graham Matherne

February 2017 Fees & Expenses	\$10,223.19
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PLUS Current Deficit (as of 3/30/2017)	<u>\$5,924.66</u>
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Proposed Interim Taxation of Costs	\$16,147.85
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Receivership Management, Inc.
P. O. Box 2307
Brentwood, TN 37024

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		February 2017
2/2/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE DECEMBER REPORT, REVIEW AND SIGN CHECKS 0.2 \$163.00 \$32.60
2/15/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE REPORT AND ARBITRATION, ISSUE RE CHECK FOR SAME 0.1 \$163.00 \$16.30
2/21/2017	Jeanne Barnes Bryant	UPDATE RE ARBITRATION 0.2 \$163.00 \$32.60
2/21/2017	Jeanne Barnes Bryant	UPDATE RE ARBITRATION 0.3 \$163.00 \$48.90
2/22/2017	Jeanne Barnes Bryant	EMAIL RE FUNDS FROM TRA, DISCUSSION WITH ROB MOORE RE NEXT STEPS 0.1 \$163.00 \$16.30
2/24/2017	Jeanne Barnes Bryant	EMAIL FROM COUNSEL, REVIEW JANUARY REPORT, QUESTIONS RE SAME, DISCUSSION WITH CODY SMITH RE CURRENT STATUS 0.2 \$163.00 \$32.60
2/27/2017	Jeanne Barnes Bryant	EMAIL RE FILING REPORT, REVIEW AND SIGN CHECKS 0.1 \$163.00 \$16.30
Total		\$195.60

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT **February 2017**

Date	Employee	Description	Hours	Rate	Total
2/1/2017	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT FOR JAN 31, 2017.	0.2	\$50.00	\$10.00
2/1/2017	Cody Smith	EMAIL GERALD WILLIAMS F1099 AND REQUEST INVOICES.	0.2	\$123.00	\$24.60
2/1/2017	Jere P. Cowan	CONFERENCE WITH C. SMITH RE: EXPENSES	0.2	\$50.00	\$10.00
2/1/2017	Jere P. Cowan	RECEIPT EXPENSES FOR PROCESSING AND PAYMENT; POST AND UPDATE FINANCIAL RECORDS; PREPARE PAYMENT; FORWARD SAME	0.5	\$50.00	\$25.00
2/1/2017	Robert E. Moore, Jr.	REVIEW INFORMATION ON PAST DUE PROCEDURES FROM E. SINOR, FORWARD RESPONSE TO EMAIL RE: SAME. 2; REVIEW AND APPROVE INVOICES .10	0.3	\$153.00	\$45.90
2/2/2017	Jere P. Cowan	EMAIL FROM E. SINOR RE: FILED STATUS REPORT; REVIEW SAME	0.2	\$50.00	\$10.00
2/7/2017	Cody Smith	RECEIVE UPDATED INFORMATION FOR CORRECT TO 1099. UPDATE AND MAIL THEN RESUBMIT TO IRS ELECTRONICALLY.	0.5	\$123.00	\$61.50
2/7/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. CALL EVERETT RE CASH FLOW PROJECTION FOR PAYOUT OF FEES AND EXP.	0.6	\$123.00	\$73.80
2/8/2017	Anna M. Hunter	FEES AND EXPENSES FOR JAN 2017 RECORDED.	0.4	\$50.00	\$20.00
2/8/2017	Cody Smith	PREPARE YEAR END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 12-31-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 12-31-16. THEN CREATE GL 2017.	0.7	\$123.00	\$86.10

LAUREL HILLS WATER DISTRICT

February 2017

Date	Name	Description	Hours	Rate	Total
2/8/2017	Jere P. Cowan	RECEIPT INVOICES AND EXPENSES FOR PROCESS; PREPARE PAYMENT FOR SAME; FORWARD	0.4	\$50.00	\$20.00
2/9/2017	Anna M. Hunter	UPDATE TRAIL BALANCE FOR 2017.	0.15	\$50.00	\$7.50
2/9/2017	Cody Smith	UPDATE NET ASSETS AND TB THROUGH CURRENT PERIOD. REVIEW CASH FLOW WITH R. MOORE.	0.6	\$123.00	\$73.80
2/13/2017	Robert E. Moore, Jr.	CALL FROM E.SINOR RE: UPDATE ON COURT PROCEEDINGS .25	0.25	\$153.00	\$38.25
2/14/2017	Robert E. Moore, Jr.	UPDATE FROM E.SINOR RE: MEDIATION .3	0.3	\$153.00	\$45.90
2/15/2017	Robert E. Moore, Jr.	REVIEW DRAFT MEDIATION STATEMENT FROM G.MATHERNE AND REPLY ON SAME .2	0.2	\$153.00	\$30.60
2/16/2017	Anna M. Hunter	UPDATE TRIAL BALANCE FOR 2017. UPDATE CATEGORIES FOR ACCOUNTING GENERAL LEDGER. UPDATE NET ASSETS AS OF 1/31/2017.	2	\$50.00	\$100.00
2/17/2017	Cody Smith	PHONE CALL CONCERNING STATUS UPDATE ON PROJECT.	0.2	\$123.00	\$24.60
2/20/2017	Cody Smith	PREPARING EXHIBITS FOR COURT REPORTS. POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION.	0.2	\$123.00	\$24.60
2/20/2017	Jere P. Cowan	EMAIL FROM C. SMITH RE: FUNDS PAYMENT	0.1	\$50.00	\$5.00
2/20/2017	Robert E. Moore, Jr.	TRAVEL TO CROSSVILLE TN FOR MEDIATION 1.75; DISCUSSION OF PROCEEDINGS WITH E.SINOR .25	2	\$153.00	\$306.00
2/21/2017	Robert E. Moore, Jr.	MEETING WITH G.MATHERNE AND E.SINOR RE: UPCOMING PROCEEDINGS .5; TRAVEL TO CUMBERLAND COUNTY JUSTICE CENTER .25; MEDIATION PROCEEDINGS 9 AM TO 6:30 PM, EXCEPT 1 HOUR FOR LUNCH 8.5, MEETING WITH G.MATHERNE AND E.SINOR RE: CONDEMNATION ACTION 1.2; RETURN TR	12.2	\$153.00	\$1,866.60
2/22/2017	Jere P. Cowan	PROCESS EXPENSES IN ACCORDANCE WITH STATUS REPORTING; UPDATE FINANCIAL ACCOUNTS RE: SAME	0.5	\$50.00	\$25.00
2/22/2017	Jere P. Cowan	RECEIPT TRA PAYMENT; POST AND UPDATE FINANCAL RECORDS RE: SAME; EMAIL R. MOORE RE: SAME	0.2	\$50.00	\$10.00
2/22/2017	Jere P. Cowan	RECEIPT WATER EXPENSES; POST AND PROCESS SAME FOR PAYMENT;	0.4	\$50.00	\$20.00

Monday, March 20, 2017

LAUREL HILLS WATER DISTRICT

February 2017

Date	Name	Description	Hours	Rate	Total
2/23/2017	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. WRITE OFF FEES AND PAYABLES THROUGH APPROVED FILINGS.	0.2	\$123.00	\$24.60
2/23/2017	Jere P. Cowan	PROCESS AND FORWARD EXPENSE PAYMENT	0.2	\$50.00	\$10.00
2/24/2017	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. CONFERENCE WITH E. SINOR AND R. MOORE OF CASH FLOW PROJECTIONS.	1.2	\$123.00	\$147.60
2/24/2017	Jere P. Cowan	UPDATED CONTACT INFORMATION FOR RESIDENT; FORWARD TO T. STEPHENS OFFICE	0.2	\$50.00	\$10.00
2/24/2017	Jere P. Cowan	ASSIST R. MOORE RE: FINALIZING AFFIDAVIT; PROCESS AND PAYMENT OF COSTS; CONFERENCE WITH C. SMITH RE: ACCOUNT FUNDS RE: SAME	0.3	\$50.00	\$15.00
2/24/2017	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: DELINQUENCY NOTICES, INVOICES, UNPAID WATER, CALL WITH COWD, CONFIRM AMOUNTS, UPDATE TO REPORTS AND ACCOUNTINGS REQUESTED .5	0.5	\$153.00	\$76.50
2/27/2017	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT AS OF 2/27/17.	0.2	\$50.00	\$10.00
2/27/2017	Jere P. Cowan	RECEIPT AND PROCESSING FUNDS; PREPARATION AND PROCESSING EXPENSES; UPDATE FINANCIAL ACCOUNTS; EMAIL FROM E. SINOR RE: FINALIZED STATUS REPORT	0.8	\$50.00	\$40.00
2/28/2017	Jere P. Cowan	RECEIPT AND PROCESSING EXPENSES; FORWARD SAME	0.4	\$50.00	\$20.00
2/28/2017	Jere P. Cowan	RECEIPT AND PROCESS EXPENSE PAYMENTS; CONFERENCE WITH C SMITH RE: INSURANCE	0.4	\$50.00	\$20.00
2/28/2017	Robert E. Moore, Jr.	EMAIL WITH E.SINOR RE: PAST DUE WATER ON CUMBERLAND POINTE CONDO REQUESTING WAIVER .2	0.2	\$153.00	\$30.60

Total **\$3,369.05**

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

March 6, 2017

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

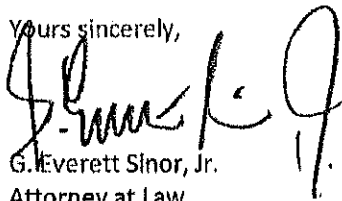
RE: February 2017 Billings – RMI/Laurel Hills Water System in Receivership

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>
2/1/2017	Email from Heather @ Lansford & Stephens re Miller account; response to same; review of L&S emails on A/R and billing; review G Williams email on leaks and service; review of L&S & R Moore emails on Miller	0.2		
2/2/2017	Finish work on 12th report	0.7		
2/7/2017	T.C. w C Smith re cash flow; review email on deposit from Heather @ L&S	0.1		
2/8/2017	T.C. inquiry from Terry Winters re LHWS system	0.1		
2/10/2017	Review of G Matherne email on easement form; T.C. w Gretchen Hardiman re bill; email to G. Williams & Heather @ L&S re Ms. Hardiman; Travel to Crossville, Tenn. for docket call	2.2		
2/13/2017	Review of LHWS documents, including A/R list and 12th report; T.C. w R Moore re docket call & mediation; review of mediation order/letter; v.m. for G Matherne re same; T.C. w G Matherne re LHWS mediation issues	1.1		
2/14/2017	Attendance at Cumberland County docket call; travel to Renegade Mountain; mtg. w Paul Loud, viewing of LH Condos POA and Loud asphalt work to be completed; V.M. for G Matherne; T.C. w R Moore re hearing; travel from Renegade Mountain to Nashville	4.6		
2/15/2017	Review of mediation brief; provision of extensive suggested revisions and commentary; T.C. w G Matherne re same	2.9		
2/16/2017	A Hunter email on net assets; review and response to same; email to K Cashman-Grams & A Conklin re fees and expenses	0.2		
2/19/2017	Review of mediation brief	0.9		
2/20/2017	Drive to Crossville for mediation; T.C. w R Moore re mediation	2.3		
2/21/2017	Mediation; Discussion with G Matherne & R Moore re same; drive to Nashville	11.0		
2/22/2017	Review A Hunter email on G Williams expense; response to same; A Conklin email on post call debrief and response; email to Heather @ L&S re: A/R report; review of A/R list; conf. call w TRA officials & R Moore & G Matherne; email from C Turner w Cumberland County C&M office with hearing order; forward same to R Moore, G Matherne, A Conklin & K Cashman-Grams	1.3		

2/23/2017	13th report preparation; review of A/r list; email to Heather to confirm accuracy; email to W Harkleroad; A Conklin email re Cumberland County; email to G Williams & Heather & L&S re A/R list, delinquency notice; review and revise delinquency notice	2.4		
2/24/2017	C Smith emails on cash flow; T.C. w R Moore & C Smith re same; Email to Heather w L&S re A/R & delinquency notice; modifications to 13th report re A/R list and transmit same to TRA; email from R Moore re COUD bill	1.4		
2/25/2017	Email from G Williams re delinquent customers; forward same to R Moore & Heather w L&S with commentary & plan to move forward	0.1		
2/27/2017	D Carter email re telephone number; T.C. w D Carter re Cumberland Pointe unit delinquency notices and policy on cutoffs; 13th report completion; email w Heather @ L&S re notice to Cumberland Pointe; emails from Heather re: cutoff procedure; email to D Carter re cutoffs	1.3		
2/28/2017	Review D Carter email re request to waive delinquency on a for-sale unit; forward same to R Moore; review G Williams email on Woodbridge condos owner information	0.1		
	Hourly Billing Total	32.9	\$140.00	\$4,606.00

		<u>Miles</u>	<u>Rate</u>	
2/10/2017	Mileage (Nashville to Crossville)	113.2		
2/14/2017	Mileage (Crossville to Crab Orchard to Nashville)	133.4		
2/20/2017	Mileage (Nashville to Crossville)	113.2		
2/21/2017	Mileage (Crossville to Nashville)	<u>113.2</u>		
	Mileage Total	473.0	\$0.47	\$222.31

2/2/2017	12th Report Postage	\$40.44		
2/14/2017	Travel Day Per Diem	\$29.25		
2/20/2017	Travel Day Per Diem	\$29.25		
2/20/2017	Hotel Bill - Crossville, Tenn.	\$93.79		
2/21/2017	Travel Day Per Diem	\$29.25		
2/27/2017	13th Report Postage	<u>\$40.44</u>		

Other Expenses Reimburseable Total \$262.42

Balance Owed this month **\$5,090.73**

Previous Balance Owed

\$2,235.57

Total Amount Due and Payable

\$7,326.30

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

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

02/02/17 01:34 PM

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001	008237 (022)	TO \$	24.48
	First Class Package		
	Tracking# MMWJNUUNUFXEW		
002	008237 (022)	TO \$	4.08
	First Class Package		
	Tracking# MMWJNUU2MA4PK		
003	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0368805059		

SubTotal \$ 40.44
Total \$ 40.44

Master Card \$ 40.44

ACCOUNT NUMBER * *****3631
Appr Code: (S) Sale

Receipt ID 8299774899595888032 003 Items
CSH: David Tran: 9390 Reg: 002

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001	008237 (022)	TO \$	4.08
	First Class Package		
	Tracking# MMWJNUU3WQQCD		
002	008237 (022)	TO \$	4.08
	First Class Package		
	Tracking# MMWJNUU6R4UWR		
003	008237 (022)	TO \$	20.40
	First Class Package		
	Tracking# MMWJNUUSZ7N4A		
004	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0303651115		

SubTotal \$ 40.44
Total \$ 40.44

Master Card \$ 40.44

ACCOUNT NUMBER * *****3631
Appr Code: (S) Sale

Receipt ID 82997748768840888034 004 Items
CSH: David Tran: 0074 Reg: 002

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BAYMONT CROSSVILLE

4038 HIGHWAY 127 NORTH
CROSSVILLE, TN 38571 US

Phone: (931) 456-9338

Fax: (931) 456-8758

Email: rajpatel@baymontinncrossville.net

Printed: 2/21/2017 8:27:44 AM

Folio (Detailed)

Name:	SINOR, GEORGE	Confirmation Number:	88178025
		Account Number:	876-170349
Address:	3504 ROBIN RD NASHVILLE, TN 37204 US	WyndhamRewards #:	151571931B
Room:	306	Room Type:	NK1, 1 KING BED/NON-SMOKING
Rate Plan:	RACK	Daily Rate:	\$79.99 + \$13.80 Tax
Arrival:	2/20/2017 (Mon)	Departure:	2/21/2017 (Tue)
		Nights:	1
		Guests:	1/0
		GTD:	MC - MASTER CARD XXXX XXXX XXXX 3631

Room Rate:
2/20/2017 (Mon) - 2/20/2017 (Mon) \$79.99 + \$13.80 Tax per night.

Date	Code	Description	Amount	Balance
2/20/2017	RM	ROOM CHARGE	\$79.99	\$79.99
2/20/2017	TAX1	STATE TAX	\$7.80	\$87.79
2/20/2017	TAX2	CITY TAX	\$6.00	\$93.79
2/21/2017	MC	MASTER CARD (3631)	(\$93.79)	\$0.00

Summary

Room	Tax	F&B	Other	CC	Cash	DB
\$79.99	\$13.80	\$0.00	\$0.00	(\$93.79)	\$0.00	\$0.00

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Guest Signature: _____

(1) Regardless of charge instructions, the undersigned acknowledges the above as personal indebtedness. (2) This property is privately owned and management reserves the right to refuse services to any one, and will not be responsible for injury or accidents to guests or loss of money, jewelry or any personal valuables of any kind. "We or our affiliates may contact you about goods and services unless you call 888-946-4283 or write to Opt Out/Privacy, Wyndham Hotel Group, LLC, 22 Sylvan Way, Parsippany, NJ 07054 to opt out. View our website about privacy."

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

MARCH 8, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1031866

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 FEBRUARY 28, 2017

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$10,206.00
OTHER CHARGES AND DISBURSEMENTS	\$17.19
TOTAL THIS INVOICE	\$10,223.19
PREVIOUSLY BILLED AND OUTSTANDING	\$14,898.31
TOTAL AMOUNT DUE	\$25,121.50

=====

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

MARCH 8, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1031866

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 FEBRUARY 28, 2017

02/01/17 FILE ORGANIZATION REGARDING UPCOMING MEDIATION
(1.00); COMPILER MATTERS TO PRESENT TO MEDIATOR
(.70).
J. GRAHAM MATHERNE 1.70 hours at 270.00 per hour. 459.00

02/06/17 REVIEW OF MATERIALS REGARDING MEDIATION
STATEMENT (.20); PREPARE FOR AND TELEPHONE
CONFERENCE WITH R. SCHWERER REGARDING TERRA
MOUNTAIN ISSUES (.70); PREPARE FOR AND
TELEPHONE CONFERENCE WITH SCOTT HALL REGARDING
MOY TOY ISSUES (.50); REVIEW SERVICE
RIGHTS/SERVICE LINE EASEMENT ISSUES AND
EXAMPLES (.70); FURTHER DRAFTING REGARDING SAME
(.70).
J. GRAHAM MATHERNE 2.80 hours at 270.00 per hour. 756.00

02/07/17 DRAFTING OF EASEMENT AGREEMENT (1.10); LENGTHY
TELEPHONE CONFERENCE WITH D. KENDAL REGARDING
SAME AND REGARDING STATUS ISSUES (.90);
TELEPHONE CONFERENCE WITH CUMBERLAND POINT
REPRESENTATIVE (LENGTHY) (.80); FURTHER WORK ON
EASEMENT ISSUES AND MATTERS RELATING TO
MEDIATION STATEMENT AND MEDIATION ISSUES (.90).
J. GRAHAM MATHERNE 3.70 hours at 270.00 per hour. 999.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1031866

Mar 8, 2017
PAGE 3

02/08/17	E-MAILS WITH D. KENDALL REGARDING EASEMENTS (.20); DRAFTING WORK REGARDING SAME (.40); FILE REVIEW REGARDING MEDIATION STATEMENT (.50). J. GRAHAM MATHERNE 1.10 hours at 270.00 per hour.	297.00
02/10/17	ALL MATTERS REGARDING DRAFTING AND REVISIONS TO MEDIATION STATEMENT (2.50); FILE ORGANIZATION AS TO MEDIATION MATERIALS (.40). J. GRAHAM MATHERNE 2.90 hours at 270.00 per hour.	783.00
02/12/17	FURTHER DRAFTING AND REVISION TO MEDIATION STATEMENT (1.10); REVIEW OF TURNBULL LETTER REGARDING MEDIATION STATEMENT (.20). J. GRAHAM MATHERNE 1.30 hours at 270.00 per hour.	351.00
02/13/17	DRAFTING AND REVISING OF MEDIATION STATEMENT. J. GRAHAM MATHERNE 3.80 hours at 270.00 per hour.	1026.00
02/14/17	E-MAILS WITH E. SINOR REGARDING DOCKET CALL (.10); CONTINUED REVISIONS REGARDING MEDIATION STATEMENT AND FURTHER LEGAL RESEARCH (2.50). J. GRAHAM MATHERNE 2.60 hours at 270.00 per hour.	702.00
02/15/17	ALL MATTERS REGARDING FINALIZATION OF MEDIATION STATEMENT (1.10); REVIEW AND INCORPORATE CHANGES FROM SINOR (.60); FINAL CROSS-CHECK OF EXHIBITS TO STATEMENT (.40); TELEPHONE CONFERENCE WITH E. SINOR REGARDING REVISIONS AND STATUS (.30); TRANSMITTAL LETTER TO JUDGE TURNBULL (.20). J. GRAHAM MATHERNE 2.60 hours at 270.00 per hour.	702.00
02/16/17	PREPARE FOR MEDIATION (.40); FILE REVIEW AND ORGANIZATION REGARDING SAME (.40). J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00
02/17/17	FILE ORGANIZATION FOR MEDIATION. J. GRAHAM MATHERNE .60 hours at 270.00 per hour.	162.00
02/20/17	FURTHER PREPARATION FOR MEDIATION AND ORGANIZATION OF MATERIAL TO TAKE TO MEDIATION (.90); TELEPHONE CONFERENCE WITH E. SINOR REGARDING SAME (.10); TRAVEL FROM NASHVILLE TO CROSSVILLE (1.80). J. GRAHAM MATHERNE 2.80 hours at 270.00 per hour.	756.00
02/21/17	ALL DAY MEDIATION INCLUDING PRE-MEDIATION DISCUSSION WITH COUNSEL, MEDIATION ATTENDANCE, POST-MEDIATION DISCUSSION WITH COUNSEL (8.00); TRAVEL FROM CROSSVILLE TO NASHVILLE (1.80). J. GRAHAM MATHERNE 9.80 hours at 270.00 per hour.	2646.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1031866

Mar 8, 2017
PAGE 4

02/22/17 E-MAILS WITH COUNSEL GROUP REGARDING MEDIATION
(.30); CONFERENCE CALL WITH COUNSEL GROUP
REGARDING MEDIATION (1.0).
J. GRAHAM MATHERNE 1.30 hours at 270.00 per hour. 351.00

TOTAL SERVICES 37.80 \$10,206.00

OUTSIDE DELIVERY COSTS 17.19

OTHER CHARGES AND DISBURSEMENTS \$17.19

TOTAL THIS INVOICE \$10,223.19

PREVIOUSLY BILLED AND OUTSTANDING \$14,898.31

TOTAL AMOUNT DUE \$25,121.50

-----TIME AND FEE SUMMARY-----

-----	TIMEKEEPER-----	RATE	HOURS	FEE
J MATHERNE	PARTNER	270.00	37.80	10206.00

RMI EXP RECOVERABLE LHWD
 2/1/17 Through 2/28/17

Category Description	2/1/17-	OVERALL
	2/28/2017	TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-178.80	-178.80
5610-CONTRACT LABOR RMI	-2,975.65	-2,975.65
5690-RMI OH EXPENSE	-410.20	-410.20
TOTAL 5100 FEES RMI	-3,564.65	-3,564.65
5150 FEES LEGAL		
5400-LEGAL FEES	-15,313.92	-15,313.92
TOTAL 5150 FEES LEGAL	-15,313.92	-15,313.92
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-6.60	-6.60
6222-TELEPHONE LONG DISTANCE	-4.20	-4.20
TOTAL 5300 EXPENSES	-46.26	-46.26
OVERALL TOTAL	-18,924.83	-18,924.83

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

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

EXHIBIT
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 February 1, 2017 through February 28, 2017 that are contained in this filing.

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

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

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

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

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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 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

Sworn to and subscribed before me this

11th day of April, 2017.


NOTARY PUBLIC

My commission expires: 1/9/2018



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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

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

EXHIBIT
H

expenses incurred for the period of time between February 1, 2017 and February 28, 2017 that are contained in the Receiver's motion.

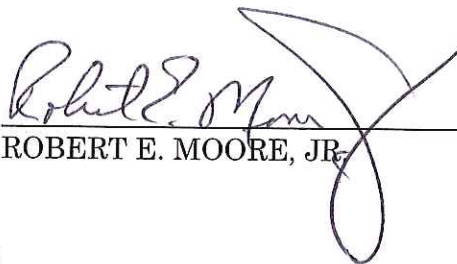
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

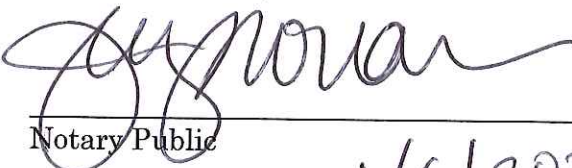
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6. Based upon an initial review of financial documentation for LHWS, it appears that there are NOT sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets 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 \$2,776.98, and that the Court order an interim taxation of costs to the Tennessee Regulatory Authority in the amount of \$16,147.85 (which includes 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
17th day of April, 2017.


Notary Public
Commission Expires: 1/6/2020



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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

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 April, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for February 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 \$18,924.83.

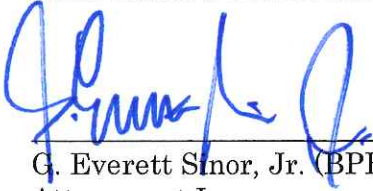
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$2776.98 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 \$16,147.85.

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:

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.
