

G. EVERETT SINOR, JR.  
Attorney at Law

August 1, 2016

COPY

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

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

12:04

FILED  
Date 8-4 2016 at PM  
Entered: \_\_\_\_\_  
SUE TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY \_\_\_\_\_

VIA UNITED STATES FIRST CLASS MAILS

Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Sixth Report and Motion for Approval of Fees and Expenses and 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.*

G. Everett Sinor, Jr. (BPR #017564)  
Attorney at Law

by permission  
*R.E. Moore*

Enclosures

cc: Receivership Management, Inc.  
Kelly Cashman-Grams, Esq.  
James Gass, Esq.  
Melanie Davis, Esq.  
Vance Broemel, Esq.  
Roger York, Esq.

Rec'd as stamped  
8/5/16  
*[Signature]*

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560

Chancellor Thurman

Date 8-4 FILED 2016 at 12:04 PM

Entered: \_\_\_\_\_  
SUE TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY \_\_\_\_\_

8/5/16  
filed as stayed

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RECEIVER'S SIXTH REPORT AND MOTION FOR APPROVAL OF FEES AND  
EXPENSES AND 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 the Receiver's Sixth Report and moves this Honorable Court for an order approving the fees and expenses presented for payment by the Receiver, and for an interim taxation of costs.

1. On October 26, 2015, the Plaintiff, the Tennessee Regulatory Authority [hereinafter the "TRA" or the "Authority"] filed a Motion for Appointment of Receiver in the above-styled action. Said motion was granted that same day, and, pursuant to Tenn. Code Ann. §§ 65-3-105 and 29-1-101, the Court appointed Receivership Management, Inc. as Receiver of the Laurel Hills Water System by order dated October 26, 2015.<sup>1</sup>

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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 ¶ 10, *infra*.

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 filed its second, third, fourth, and fifth reports with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016 and June 27, 2016, respectively, in which it provided the Court with additional financial and operational information, summarized the Receiver's activities regarding the system, and detailed some of the continuing legal issues involving control of the water system properties in question.

#### Implementation of Receivership Plan

3. As previously reported, on June 9, 2016, this Honorable Court granted the Receiver's motion and adopted its proposed receivership plan, and ordered the Receiver to "forthwith implement and carry out its receivership plan." That receivership plan provides as follows:

- a. The Receiver will solicit bids for the ownership and/or operation of the LHWS. Each of the three (3) private utility companies [that have expressed interest], as well as the Crab Orchard Utility District, and any other interested party, will be invited to provide a proposal to the Receiver for consideration. If a satisfactory proposal is received and a satisfactory deal can be negotiated for the long-term ownership, operation and viability of the LHWS, then the proposal will be brought to this Honorable Court with a recommendation for approval.

- b. Failing this, the Receiver will determine whether a cooperative of LHWS customers can competently operate the LHWS, either by itself or with the assistance of a master appointed by the Court.
- c. Failing this, the Receiver will report back to the Court for further instruction.

4. On June 24, 2016, the Receiver sent bid packages to all parties that have, at one time or another, expressed interest in the operation and/or ownership of the LHWS. The cover letter required that a confidentiality agreement, prepared by the Receiver, be executed and returned to the Receiver, in order for further due diligence information to be provided, and also in order for the potential buyer to be considered by the LHWS as a potential suitor. A copy of the bid package (with names redacted) is attached hereto as Exhibit A and is incorporated herein by reference.

5. Confidentiality agreement have been received by the Receiver from potential suitors for the LHWS. All due diligence must be completed by July 20, 2016, and bids are due to the Receiver by August 1, 2016.

#### Other Activities of the Receiver

6. On June 9, 2016, on motion of the Receiver, this Honorable Court adopted by order a modification of the rates to be charged to customers of the LHWS. The LHWS rate was increased to \$114.24 per customer per month, a \$1000.00 tap fee was established, and other rate structure rules were adopted. The new rate and rate structure were ordered to go into effect on July 1, 2016.

7. For the July, 2016 billing cycle, LHWS customers received bills that reflected the new rate. It is too early to determine what sort of response the Receiver will get to the newly established rate and rate structure. The Receiver intends to report on that response in its next report.

### Financial Information

8. As noted above, as of July 1, 2016, each customer of the LHWS will receive a bill in the amount of \$114.24 per month. At this time, there are four (4) LHWS billed customers who consistently do not pay their water bill. As of June 30, 2016, there was an accounts receivable balance of \$14,202.02.<sup>2</sup> A copy of the Accounts Receivable Aging Summary, calculated as of July 13, 2016, is attached hereto as Exhibit B and is incorporated herein by reference.

9. On a cash basis, LHWS had a net loss in June 2016 of \$3733.16. See Collective Exhibit C, attached hereto and incorporated herein by reference. As of June 30, 2016, LHWS had a \$7651.16 balance in its main operating account. See Collective Exhibit D, attached hereto and incorporated herein by reference.

10. The LHWS lacks the cash to meet current obligations. Additional past due balances with Lansford & Stephens for accounting, mailing and tax services, with Mr. Gerald Williams for engineering services, and with CNA Insurance Company for general liability insurance, have been included below in the "Fees and Expenses for Receiver" section of this report, which the Receiver believes is permitted by the Amended Order Appointing Receiver.

### Ownership and Control of Water System Properties in Question

11. As previously reported, counsel for Moy Toy, LLC, Gregory C. Logue, Esq. copied the receiver's COO, Robert E. Moore, Jr. on a letter directed to Melanie Davis, counsel for Eagles Nest LLC raising issues relative to Eagles Nest's connection to the water system. Based on this letter and given the uncertainty concerning proper title to the LHWS, on April 12, 2016, Mr. Moore directed Mr. Sinor to send a letter to Moy Toy LLC

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<sup>2</sup> Note that this is significantly higher than previous reports. This is due to the increase in rates for the LHWS, combined with the fact that the report was generated prior to the due date for the newly established rate.

counsel, Mr. Logue. In his letter, Mr. Sinor asked numerous questions about the ability of the LHWS to operate and expand the LHWS, and whether Moy Toy or any other party intended to assert any rights which might prevent such operation or expansion. Mr. Sinor also tried to contact Mr. Logue by telephone on April 22, 2016 to follow up on the request, but Mr. Logue has not returned that telephone call.

12. Mr. Logue responded on May 31, 2016 by letter. Mr. Logue did not substantively respond to the questions contained in the letter; rather, he referred the Receiver to Moy Toy's "Florida counsel", Rob Schwerer, Esq. Later on May 31, 2016, Mr. Schwerer sent an email to counsel for the Receiver, in which he referred the Receiver to Scott Hall, Esq., stating that "Scott Hall is handling matters for Moy Toy relative to any water system issues." Mr. Sinor, on behalf of the Receiver, sent a copy of his April 12, 2016 letter to Messrs. Schwerer and Hall on June 3, 2016, seeking a response to his initial April 12, 2016 letter. All referenced correspondence was included in the Receiver's Fifth Report to this Honorable Court.<sup>3</sup> The Receiver has still not received a substantive response to Mr. Sinor's April 12, 2016 letter from Moy Toy, LLC.

#### Fees and Expenses of Receiver

13. 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 interim taxation of costs, if necessary.<sup>4</sup>

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<sup>3</sup> Receiver's Fifth Report, filed on June 27, 2016, at Exhibit D.

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

14. As shown in Collective Exhibit E, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, Chief Operations Officer of the Receiver, and other persons at the Receiver's office, including Ms. Jeanne Bryant, Mr. Cody Smith, and Ms. Jere Cowan, performed work for this Receivership for the period of June 1, 2016 through June 30, 2016 in the amount of \$5312.22.<sup>5</sup> Those working on contract for the Receiver under Mr. Moore (Mr. Sinor) have performed work for the Receivership and have incurred fees and expenses as shown in Collective Exhibit E for the period June 1, 2016 through June 30, 2016 in the amount of \$3898.11.

15. As further shown in Collective Exhibit E, attached hereto and incorporated herein by reference, Mr. Gerald Williams, contract engineer for the LHWS, and Lansford & Stephens, contract accountant for the LHWS, have performed services for the LHWS and currently have past due balances for May and June, 2016, which have not previously been reported to this Honorable Court. Furthermore, there is an outstanding balance for CNA Insurance Company for general liability insurance. Those balances are as follows:

- a. Mr. Gerald Williams: \$1000.00
- b. Lansford & Stephens: \$1280.00
- c. CNA Insurance Company: \$1270.09.

16. The Authority has determined these fees, costs and expenses to be reasonable, appropriate and necessary for the services rendered for the Receivership, and, thus, these fees, costs and expenses have been approved for payment by the Authority. *See* Affidavit of Kelly Cashman-Grams, General Counsel for the Tennessee Regulatory Authority, attached hereto as Exhibit F and incorporated herein by reference; *see also*

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<sup>5</sup> This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of June 1, 2016 through June 30, 2016, which total \$746.32.

Affidavit of Robert E. Moore, Jr., attached hereto as Exhibit G and incorporated herein by reference.

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

- a. Invoices for Robert E. Moore, Jr. and others at the Receiver for June of 2016: \$5312.22;
- b. Invoices for those working under Mr. Moore for June of 2016: \$3898.11;
- c. Past due May and June, 2016 balance for Gerald Williams: \$1000.00;
- d. Past due May and June, 2016 balance for Lansford & Stephens: \$1280.00; and,
- e. Outstanding balance for general liability insurance to CNA Insurance Company: \$1270.09.

18. At present, and based upon initial review by the Receiver, there do not exist sufficient assets, over and above what is needed for operations of Laurel Hills Water System for the Laurel Hills Water System Receivership estate to pay the above-referenced fees and expenses. *See* Moore Affidavit, Exhibit G. Accordingly, as provided in the Court's Amended Order Appointing Receiver, request is made for the interim taxation of costs to the Tennessee Regulatory Authority in the amount of those fees and expenses.

19. 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 and Interim Taxation of Costs for the Court's consideration if no opposition is filed.

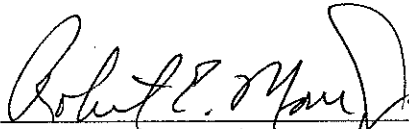


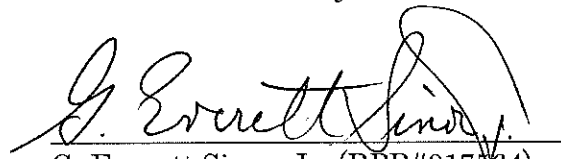
Motion for Approval of Fees and Expenses and Interim Taxation of Costs

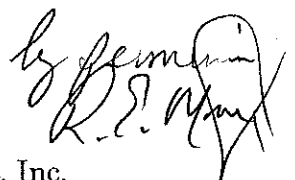
Accordingly, the Receiver respectfully MOVES this Court for an order approving the payment of fees and expenses as set forth in the aggregate amount of \$12,760.42, and further MOVES this Court to tax costs to the Authority on an interim basis in said aggregate amount.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By:   
Robert E. Moore, Jr. (BPR#017600)  
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. (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 permission*  


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:

Kelly Cashman-Grams, Esq.  
General Counsel  
Tennessee Regulatory Authority  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

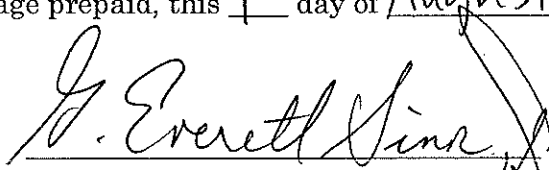
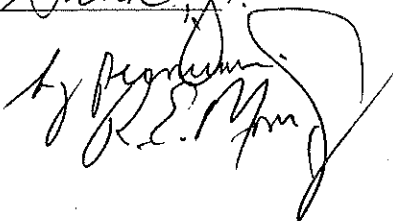
James L. Gass, Esq.  
Ogle, Gass & Richardson  
Counsel for Laurel Hills Condominiums  
Property Owners Association  
103 Bruce Street  
Sevierville, Tennessee 37862

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

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

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

via the United States Mails, postage prepaid, this 1<sup>st</sup> day of August, 2016.

  
G. Everett Sinor, Jr.  


## Receivership Management, Inc.

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

June 24, 2016

[REDACTED]

RE: Laurel Hills Water System of Renegade Mountain  
Near Crab Orchard, Tennessee

[REDACTED]

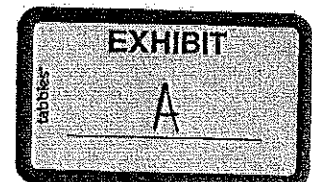
Receivership Management, Inc. ("RMI") is the court-appointed receiver of Laurel Hills Water System ("LHWS") located on Renegade Mountain, near Crab Orchard, Tennessee. RMI is seeking bid proposals for the purchase of LHWS through an asset purchase in order to evaluate the market for this water system.

You have indicated to RMI an interest in acquiring LHWS. You are invited to review the enclosed information and determine whether you have an interest in obtaining additional information concerning these assets, conducting further due diligence, investigation and ultimately bidding to acquire its assets.

Time is of the essence in this matter. In order for you to be considered as a potential buyer of LHWS assets, and in order for you to be provided and have access to further information regarding LHWS, you must provide written notification and return the enclosed signed Confidentiality Agreement to this office no later than July 1, 2016. Also, in your notification, you should describe what further information you want to review and when you can schedule your due diligence visit and efforts. All information reasonably available to the Receiver regarding LHWS operations and accounts will be made available for review at 1101 Kermit Drive, Suite 735, Nashville, Tennessee 37217 commencing July 1, 2016 during normal business hours of 8 A.M. to 4:30 P.M., central time. Upon request, the Receiver will copy any information requested and in the Receiver's possession at a charge of \$.10 per page, plus a labor charge of \$35.00 per hour.

All due diligence must be completed by Wednesday, July 20, 2016. A bid or written proposal to purchase LHWS assets must be received in this office no later than 4:00 p.m. central time on Wednesday, August 1, 2016. The bid or written proposal to purchase LHWS assets should be accompanied by the following information:

- Background information on the bidder/proposer
- Background and biographical information on the officers/directors/members of the bidder/proposer



- Financial Information concerning the bidder/proposer to include a financial statement, balance sheet, cash flow/profit loss statement

Enclosed with this letter are a historical financial information package on the water system and a Confidentiality Agreement. After receipt of an executed Confidentiality Agreement, the following information will be available:

1. Copy of supplier contract with Crab Orchard Utility District.
2. Copy of any Tennessee Department of Environment and Conservation Reports regarding the system
3. The most recent water quality testing report from LHWS testing contractor, Microban
4. Current effective and approved rate filings with the Tennessee Regulatory Authority
5. Irrevocable license agreement from Renegade Mountain developer Moy Toy, LLC.
6. Title documents to the system.

#### Brief Discussion and Background of Laurel Hills Water System

LHWS is the exclusive supplier of drinking water to residents and businesses located on Renegade Mountain, near Crab Orchard, Tennessee. Development of Renegade Mountain as a resort community began in the late 1960s. Renegade Mountain is located in Cumberland County Tennessee, east of Crossville, Tennessee and is adjacent to the community of Crab Orchard, Tennessee, Interstate Highway 40 and U.S. Highway 70. The resort is not fully developed but development has continued since the 1970s. Amenities installed but currently not operating include an 18 hole golf course and sports park. Since it enjoys an elevation as high as Ober-Gatlinburg, Renegade Mountain was initially developed as both a ski and golf resort; however, snow skiing operations ceased sometime in the 1990s. Development efforts now are focused more on providing secluded retreats/vacation homes with spectacular views. Renegade Mountain consists of both single family and multifamily homes/condominiums.

Cumberland County and Crossville, Tennessee are known as the golf course capital of Tennessee. It is a golfer's dream with at least 10 courses nearby. Crossville itself is a retirement destination with excellent medical facilities. It is convenient to Chattanooga, Nashville, and Knoxville. Residents of Renegade Mountain include employees of firms located in these cities, including the large Volkswagen Plant in Chattanooga.

Crossville is home to Picoso North America, an automotive equipment manufacturer and supplier, Conlix, LLC, a shared network of warehouses and transportation services for suppliers to automotive manufacturers, and Flowers Bakery's regional bread bakery. These companies along with Cumberland Regional Medical Center account for over 2,000 employees. In addition, Crossville has developed as a manufacturing site for porcelain and stone building materials. These industries comprise Crossville's manufacturing base.

LHWS began operations in 1973. The system installation consists of a two pump pumping station, 6 inch supply pipe, 6,4 and 2 inch distribution piping, and 250,000 gallon water tank. The system contains 13 miles of supply and distribution piping, all but 700 feet are underground.

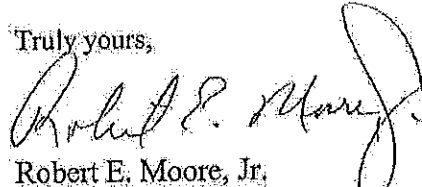
LHWS receives its supply of water from Crab Orchard Utility District from a connection to its system at the foot of Renegade Mountain. The system currently has just over 130 customers, all mostly residential. The system has no employees. An individual is contracted as a water engineer who is certified and qualified. Approximately 475,000 gallons of water is distributed through the system on a monthly basis.

The Receiver reserves the right to accept or reject any and all bids or proposals. All bids/proposals will be reviewed by the Receiver, and the Receiver has exclusive discretion to review and recommend to the Court a particular proposal as the Receiver deems in the interests of the estate. Any recommended bid/proposal is subject to court approval and any purchase agreement executed by the parties is subject to court approval. All applicable statutes and rules of the Tennessee Regulatory Authority must be complied with in connection with any purchase agreement, including if applicable, the procurement of a Certificate of Convenience and Need.

If you have questions, please direct those to Jeanne Bryant or Rob Moore at 615-370-0051. The address/fax number to send your Confidentiality Agreement (to be received by 4 p.m. central time deadline on July 1, 2016 is:

Laurel Hills Water System in Receivership  
1101 Kermit Drive, Suite 735  
Nashville, TN 37217  
FAX 615-373-4336

Truly yours,



Robert E. Moore, Jr.  
Receivership Management, Inc.  
Receiver of Laurel Hills Water System

## CONFIDENTIALITY AGREEMENT

The Receiver of Laurel Hills Water System (respectively, the "Receiver" and "LHWS") has furnished the undersigned ("we" or "us") with certain information in connection with the proposed sale of LHWS and the assets related thereto. This information concerning LHWS (referred to herein as the "Evaluation Material") is being provided exclusively in connection with our investigation thereof, and the Receiver may furnish additional Evaluation Material in the future, all of which is strictly confidential.

This is to further confirm our interest in receiving additional Evaluation Material and our continued interest in evaluating the business of LHWS with a view towards making a written proposal or bid to purchase LHWS or its assets. This is not a commitment by the undersigned to make such a written proposal or bid, but only to be bound by the confidentiality obligations set forth herein.

The undersigned agrees that any Evaluation Material (whether documentary or oral) furnished by agents or representatives of the Receiver or LHWS will be kept strictly confidential. In no event shall we use such Evaluation Material for any purpose except in connection with our investigation of LHWS; provided, however, that the Evaluation Material may be disclosed to the officers, directors, employees, legal counsel, accountants or financial advisors (collectively the "Representatives") who need to know such information for the purpose of assisting the undersigned in reviewing the business of LHWS, all of whom shall be informed of the terms and conditions of this Confidentiality Agreement and shall agree to be bound by the terms hereof.

The undersigned agrees not to make such Evaluation Material available to any other person or group for any other purpose whatsoever. The undersigned further agrees that without the prior written consent of the Receiver, we will not disclose to any third party the fact that we have received confidential Evaluation Material on the business of LHWS, or that discussions or negotiations are taking place or have taken place, or the status thereof and that the Evaluation Material will not be used in any way detrimental to the Receiver or LHWS.

The foregoing restrictions with respect to Evaluation Material furnished shall not apply to any Evaluation Material which the undersigned can demonstrate (i) is or becomes generally available to the public other than as a result of disclosure by us or our Representatives, (ii) is or becomes available to us on a non-confidential basis prior to disclosure to us by the Receiver or its representatives, (iii) is or becomes available to us on a non-confidential basis from a source other than the Receiver or LHWS or their representatives, which source was itself not prohibited from disclosing such information by a contractual or other obligation or (iv) is required to be disclosed by law or by subpoena issued by any court (in which case we shall advise and consult with the Receiver and its counsel prior to any proposed disclosure).

The undersigned acknowledges that neither the Receiver, LHWS nor any of their representatives makes any express or implied representation or warranty as to the accuracy or completeness of any Evaluation Material, and the undersigned agrees that no such person will have any liability to you on any basis resulting from our use of the Evaluation Material.

The undersigned agrees not to initiate or maintain contact with any agent or representative of the Receiver or LHWS with respect to the business of LHWS, except with the express permission of the Receiver.

This agreement will be governed by and construed in accordance with the laws of the State of Tennessee, without regard to the principles of conflict of laws thereof. Jurisdiction of this agreement is only in the State of Tennessee and venue is only proper in the Cumberland County, Tennessee Chancery Court.

The undersigned agrees upon the request of the Receiver to return to the Receiver or destroy all Evaluation Material furnished without retaining any copies thereof or extracts, and, if destroyed, to provide a written certification of such destruction. The terms of Confidentiality Agreement will survive the return of such Evaluation Material.

The undersigned acknowledges that a breach of any of the provisions of this agreement would cause irreparable harm to the Receiver or LHWS for which it could not be adequately compensated with money damages. Accordingly, in the event of any such breach, the undersigned agrees that the Receiver shall be entitled to temporary and permanent injunctive relief and specific performance of the provisions hereof without the necessity of proving actual damage or posting a bond or other security, which shall be in addition to any and all other legal and equitable remedies available.

The undersigned and the Receiver acknowledge and agree that unless and until a written definitive agreement concerning a transaction relating to LHWS has been executed, neither the Receiver nor the undersigned will have any liability to the other with respect to the transaction, whether by virtue of this agreement, any other written or oral expression with respect to a transaction or otherwise, and each of the Receiver and the undersigned will have the right at any time to discontinue the undersigned's evaluation of LHWS.

Accepted and agreed to as of the date written below:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Date: \_\_\_\_\_

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

	FOR THE PERIOD		
	10/26/2015 4/30/2016	5/1/2016 5/31/2016	10/26/2015 5/31/2016
<b>RECEIPTS</b>			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	26,910.16	6,950.90	33,861.06
TOTAL REVENUE	26,910.16	6,950.90	33,861.06
<b>DISBURSEMENTS</b>			
<b>FEEES</b>			
5695-ACCOUNTING FEES	900.00	-	900.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR (NOTE B & D)	2,345.56	-	2,345.56
TOTAL FEES	3,294.56	-	3,294.56
<b>OTHER EXPENSES:</b>			
5697-OTHER FEES	100.00	-	100.00
6060-RENT	-	-	-
6190-EQUIPMENT MAINTENANCE	349.78	553.10	902.88
6210-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 (NOTE C)	17,597.92	-	17,597.92
6299-MISC EXPENSE	493.80	-	493.80
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE (NOTE A)	-	-	-
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	18,729.08	553.10	19,282.18
TOTAL EXPENSES	22,023.64	553.10	22,576.74
NET RECEIPTS LESS DISBURSEMENTS	4,886.52	6,397.80	11,284.32
<b>SCHEDULE OF CHANGE IN NET ASSETS:</b>			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	4,886.52	6,397.80	11,284.32
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	4,986.52	-	11,384.32

6/24/2016 15:53

TOTAL ASSETS	4,986.52	11,384.32
TOTAL LIABILITIES	-	-
NET ASSETS	4,986.52	11,384.32

NOTE A: FIGURE DOES NOT INCLUDE PAYABLE FOR GENERAL LIABILITY INSURANCE PREMIUM OF \$3,789.25.

NOTE B: FIGURE DOES NOT INCLUDE \$1,480.00 TO LANSFORD & STEPHENS FOR INVOICES JANUARY 2016 - APRIL 2016, AND \$2,500.00 IN FEES TO GERALD WILLIAMS FOR INVOICES DECEMBER 2015 - APRIL 2016 TOTALING \$3,980.00.

NOTE C: FIGURE DOES NOT INCLUDE \$7,360.85 OWED TO CRAB ORCHARD UTILITY DISTRICT FOR PRIOR UTILITY CHARGES.

NOTE D: FIGURE DOES NOT INCLUDE ACCOUNT PAYABLE OWED/DUE TO TRA FOR RECEIVERSHIP FEE, OTHER CONTRACT LABOR, AND LEGAL FEES TOTALING \$37,858.4



3:15 PM

07/18/16

**Laurel Hills Water System In Receivership**  
**A/R Aging Summary**  
 As of July 13, 2016

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BENSON, CYNTHIA L	114.24	33.10	0.00	0.00	0.00	147.34
BREG, DAVID & AUDREY	114.24	0.00	0.00	0.00	0.00	114.24
CECCHETT, DON & DIANNE	114.24	0.00	0.00	0.00	0.00	114.24
CPGA (84)	9,596.16	0.00	0.00	0.00	0.00	9,596.16
DEPEW, MICHAEL (Running Deer)	114.24	0.10	0.00	0.00	0.00	114.34
DOUGLAS, JIMMY & JACKIE	114.24	33.10	33.10	0.00	0.00	180.44
ELLIS, ALVIN	114.24	0.00	0.00	0.00	0.00	114.24
GRIGSBY, GLEN E.	114.24	0.00	0.00	0.00	0.00	114.24
HALE, DANYON	114.24	0.00	0.00	0.00	0.00	114.24
HEIRS, LUKE & ANNA DUNN	114.24	33.10	33.10	0.00	0.00	180.44
HENMAN, MIKE	1.40	0.00	0.00	0.00	0.00	1.40
HOGARTH, ARDIS	114.24	0.00	0.00	0.00	0.00	114.24
KRABOUSANOS, MIKE	114.24	0.00	0.00	0.00	0.00	114.24
LATHAM, KENT	114.24	0.00	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5101)	114.24	0.00	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5102)	114.24	0.00	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5103)	114.24	0.00	0.00	0.00	0.00	114.24
MANERS, EMMETT	114.24	0.00	0.00	0.00	0.00	114.24
MATERDOMINI, DINA	114.24	33.10	0.00	0.00	0.10	147.44
MCMEANS, LARRY	114.24	0.00	0.00	0.00	0.00	114.24
MITCHELL SHARON	114.24	33.10	33.10	33.10	662.00	875.54
MURPHY, JEFF	114.24	33.10	0.00	0.00	0.00	147.34
NEALE, MIKE	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (1)	114.24	0.00	0.00	0.00	0.00	114.24
PETERS, JOHN (2)	114.24	0.00	0.00	0.00	0.00	114.24
PETERS, JOHN (3)	114.24	0.00	0.00	0.00	0.00	114.24
ROBINSON, CARL	114.24	0.00	0.00	0.00	0.00	114.24
SANDLIN, DONALD & BRENDA	114.24	0.00	0.00	0.00	0.00	114.24
SCHLABATH, DAVID & CHRISTY	114.24	0.00	0.00	0.00	0.00	114.24
SCHWARTZ, ROBERT	0.00	0.00	0.00	0.00	298.30	298.30
TARLETON, CLAY	0.00	114.24	0.00	0.00	0.00	114.24
ZABELNY, LOUIS & RENEE TODD	114.24	0.00	0.00	0.00	0.00	114.24
<b>TOTAL</b>	<b>12,682.04</b>	<b>427.18</b>	<b>99.30</b>	<b>33.10</b>	<b>960.40</b>	<b>14,202.02</b>

EXHIBIT

B

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

	FOR THE PERIOD		
	10/26/2015 4/30/2016	6/1/2016 6/30/2016	10/26/2016 6/30/2016
<b>RECEIPTS</b>			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	26,910.16	4,433.00	38,294.06
TOTAL REVENUE	26,910.16	4,433.00	38,294.06
<b>DISBURSEMENTS</b>			
<b>FEEs</b>			
5695-ACCOUNTING FEES	900.00	-	900.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR (NOTE B & D)	2,345.56	-	2,345.56
TOTAL FEES	3,294.56	-	3,294.56
<b>OTHER EXPENSES:</b>			
5697-OTHER FEES	100.00	-	100.00
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 (NOTE C)	17,597.92	8,052.68	26,203.70
6299-MISC EXPENSE	493.80	113.48	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE (NOTE A)	-	-	-
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	18,729.08	8,166.16	27,448.34
TOTAL EXPENSES	22,023.64	8,166.16	30,742.90
NET RECEIPTS LESS DISBURSEMENTS	4,886.52	(3,733.16)	7,551.16
<b>SCHEDULE OF CHANGE IN NET ASSETS:</b>			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	4,886.52	(3,733.16)	7,551.16
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	4,986.52	-	7,651.16

7/18/2016 15:29

TOTAL ASSETS	4,986.52	7,651.16
TOTAL LIABILITIES	-	-
NET ASSETS	4,986.52	7,651.16

NOTE A: FIGURE DOES NOT INCLUDE PAYABLE FOR GENERAL LIABILITY INSURANCE PREMIUM OF \$6,315.43.

NOTE B: FIGURE DOES NOT INCLUDE \$980.00 TO LANSFORD & STEPHENS FOR INVOICES JUNE 2016 PLUS TAX FILING INVOICE.

NOTE B: FIGURE DOES NOT INCLUDE \$3,058.69 PAYABLE TO COUD.

NOTE C: FIGURE DOES NOT INCLUDE ACCOUNT PAYABLE OWED/DUE TO TRA FOR RECEIVERSHIP FEE, OTHER CONTRACT LABOR, AND LEGAL FEES TOTALING \$37,858.4



LAUREL HILLS WATER DISTRICT  
REGIONS BANK ACCOUNT 232618611

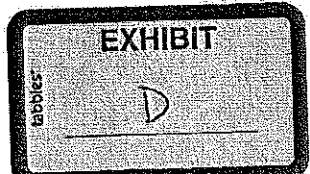
6/30/2016

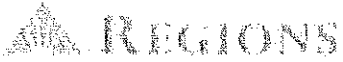
OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	7,663.16	7,651.16
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	-	
	<u>7,651.16</u>	<u>7,651.16</u>

18-Jul-16  
03:53 PM

~~OUTSTANDING CHECKS~~





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**

June 1, 2016 through June 30, 2016

**SUMMARY**

Beginning Balance	\$11,396.32	Minimum Balance	\$4,021
Deposits & Credits	\$4,433.00 +	Average Balance	\$9,135
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$8,166.16 -		
Ending Balance	\$7,663.16		

**DEPOSITS & CREDITS**

06/02	Deposit - Thank You	99.30
06/15	Deposit - Thank You	3,607.90
06/22	Deposit - Thank You	331.00
06/30	Deposit - Thank You	394.80
Total Deposits & Credits		\$4,433.00

**CHECKS**

Date	Check No.	Amount	Date	Check No.	Amount
06/14	1032	7,360.85	06/23	1034	490.83
06/14	1033	113.48	06/27	1035	201.00
Total Checks					\$8,166.16

\* Break In Check Number Sequence.

**DAILY BALANCE SUMMARY**

Date	Balance	Date	Balance	Date	Balance
06/02	11,495.62	06/22	7,960.19	06/30	7,663.16
06/14	4,021.29	06/23	7,469.36		
06/15	7,629.19	06/27	7,268.36		

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

Jeanne Barnes Bryant

June 2016 Fees \$476.80

Receivership Management, Inc.

June 2016 Fees \$4,089.10

June 2016 Overhead Expense \$553.00

June 2016 Expenses \$193.32

Everett Sinor

June 2016 Fees & Expenses \$3,898.11

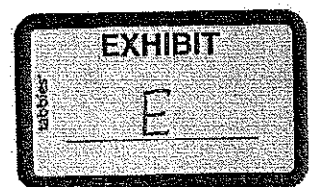
Other

Gerald Williams (May & June 2016 invoice) \$1,000.00

Lansford & Stephens (May & June 2016 invoices) \$1,280.00

CNA Insurance Company (outstanding invoice) \$1,270.09

\$12,760.42



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

Invoice for Professional Services

June 2016

LAUREL HILLS WATER DISTRICT

Date	Service Description	Hours	Rate	Total
6/1/2016	EMAIL FROM SINOR RE MOTION AND PLAN, CALL RE SAME, DISCUSSION WITH ROB MOORE	0.6	\$163.00	\$97.80
6/2/2016	UPDATE FROM ROB MOORE RE PLAN FILING AND CALL, REVIEW FINAL FILING	0.2	\$163.00	\$32.60
6/3/2016	QUESTION TO ROB MOORE RE MAY REPORT AND INVOICES TO BE INCLUDED	0.1	\$163.00	\$16.30
6/6/2016	EMAIL RE HEARING FROM MOY TOY	0.1	\$163.00	\$16.30
6/8/2016	DISCUSSION WITH ROB MOORE RE HEARING	0.1	\$163.00	\$16.30
6/9/2016	UPDATE RE HEARING	0.1	\$163.00	\$16.30
6/14/2016	REVIEW MAY REPORT, QUESTION TO COUNSEL RE SAME	0.2	\$163.00	\$32.60
6/15/2016	EMAILS TO AND FROM COUNSEL, DISCUSSION WITH ROB MOORE RE MAY REPORT, REVIEW NEW DRAFTS RE SAME	0.3	\$163.00	\$48.90
6/16/2016	EMAILS FROM ROB MOORE AND COUNSEL RE BID PACKAGE AND QUESTIONS RE SAME, REVIEW INFORMATION, EMAIL RE SAME	0.6	\$163.00	\$97.80
6/17/2016	EMAILS FROM COUNSEL RE BID PACKAGE AND RESPONSES RE SAME	0.2	\$163.00	\$32.60
6/21/2016	EMAILS FROM COUNSEL RE MAY MOTION, EMAIL FROM ROB MOORE RE BID PROCESS STATUS, REVIEW SAME	0.5	\$163.00	\$81.50
6/30/2016	QUESTION RE RATES AND CURRENT INVOICES, EMAIL TO AND FROM COUNSEL RE RATE LETTER	0.2	\$163.00	\$32.60
Total				\$521.60

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		June 2016
6/1/2016	Robert E. Moore, Jr.	1.1 \$133.00 \$168.30
CALL FROM J. LAWSON RE: INFORMATION FROM COMMUNITY MEETING 10; CALL WITH S. BOZARTH RE: RECEIVERSHIP PLAN 5; CALL WITH E. SINOR RE: EMAIL TO AND FROM S. BOZARTH DISCUSSION ON FILING RECEIVERSHIP PLAN FOR JUNE 9 HEARING 5		
6/2/2016	Robert E. Moore, Jr.	1.35 \$153.00 \$206.55
CALL WITH TRA REPRESENTATIVES RE: RECEIVERSHIP PLAN RESPOND TO QUESTIONS RE: COMPONENTS OF PLAN, TIMING PARTIES 1.10; REVIEW DRAFT RECEIVERSHIP PLAN AND AUTHORIZE FILING WITH E. SINOR 25		
6/3/2016	Cody C. Smith	0.1 \$123.00 \$12.30
POST FEE AND EXPENSE ACCRUALS TO GL, PREPARE NECESSARY BACKUP DOCUMENTATION		
6/3/2016	Cody C. Smith	1.6 \$123.00 \$196.80
DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD WITH R. MOORE, RECONCILE ACCOUNT THROUGH 6/3/16 AND PAY CURRENT BILLS, EMAIL E. SINOR TO DISCUSS PAYMENT SCHEDULE OF BOND.		
6/5/2016	Cody C. Smith	0.2 \$123.00 \$24.60
EMAIL EVERETT SINOR ABOUT PAYMENT SCHEDULE FOR INSURANCE ISSUE ON LHWD.		
6/6/2016	Cody C. Smith	1.2 \$123.00 \$147.60
DISCUSSION WITH R. MOORE OVER INSURANCE PAYMENT SCHEDULE, CALL EVERETT WOT DISCUSS LHWD BILLS AND INVOICE, PULL ALL CRAB ORCHARD INVOICES, OCT 2015 - CURRENT, AND SCAN TO EVERETT AND R. MOORE EMAIL.		
6/6/2016	Jerry P. Colvan	0.8 \$50.00 \$40.00
PAYMENT OF INVOICES RECEIVED; CONFERENCE WITH C. SMITH RE: ADDITIONAL DEPOSITS NOT RECEIVED FROM STEPHENS RESEARCH SAME; CONFERENCE WITH J. BRYANT RE: INVOICES		

LAUREL HILLS WATER DISTRICT

June 2016

Date	Employee	Description	Hours	Rate	Total
6/6/2016	Robert E. Moore, Jr.	CALL FROM E. SINOR RE: SCHEDULING FOR HEARING AND PRELIMINARY MEETING; 75; EMAIL FROM E. SINOR RE: CORRESPONDENCE FROM MOY TOY AND COUNSEL, FORWARD SAME TO J. BRYANT; 10; MEETING WITH C. SMITH RE: INVOICE FROM VEC; OTHER PENDING PAYMENTS, CASH FLOW; 2.	1.05	\$153.00	\$160.65
6/8/2016	Cody C. Smith	UPDATE NET ASSETS FOR LHWL WATER OPERATIONS ONLY; EMAIL TERRY STEPHENS AND EVERETT SINOR FOR MOST RECENT INVOICES AND BILLS; MEET WITH R. MOORE TO PROVIDED MONTHLY AVERAGE EXPENSE FOR JUST WATER OPERATION AND MONTHLY DEPOSITS.	1.6	\$123.00	\$196.80
6/8/2016	Robert E. Moore, Jr.	TRAVEL FROM NASHVILLE TO CROSSVILLE, DISCUSSION AND PREPARATION FOR HEARING WITH E. SINOR; 2.5	2.5	\$153.00	\$382.50
6/9/2016	Jere P. Cowan	EMAIL DEPOSIT INFORMATION FROM T. STEPHENS OFFICE, UPDATE FINANCIAL RECORDS RE: SAME	0.3	\$50.00	\$15.00
6/9/2016	Jere P. Cowan	TELEPHONE CONVERSATION WITH R. MOORE AND E. SINOR RE: ORDERS FROM HEARING AND FORWARDING COUNSEL SET; EMAIL FROM T. STEPHENS OFFICE SENDING ORDER; FORWARD SAME TO COUNSEL	0.5	\$50.00	\$25.00
6/9/2016	Robert E. Moore, Jr.	PRE-HEARING MEETINGS; HEARING, POST HEARING MEETINGS WITH CONSUMERS 4.0; MEETING WITH T. STEVENS RE: NEW RATE ISSUES; 4; MEETING WITH E. SINOR RE: SCHEDULING OF BID PROCESS, QUESTIONS ON COMMUNICATIONS RECEIVERSHIP PARTIES 1.0; RETURN TRAVEL TO NASHVILLE 2.0	7.4	\$153.00	\$1,132.20
6/10/2016	Cody C. Smith	POST FEE AND EXPENSE ACCRUALS TO GL; REQUEST DEPOSIT SLIPS FROM HEATHER TO PROVIDE BACK UP DOCUMENTATION FOR ACCOUNT RECONCILE; PHONE CALL WITH MICROBAN TO DISCUSS O/S INVOICES.	1.2	\$123.00	\$147.60
6/14/2016	Cody C. Smith	POST FEE AND EXPENSE ACCRUALS TO GL; PREPARE NECESSARY BACKUP DOCUMENTATION	0.3	\$123.00	\$36.90
6/15/2016	Cody C. Smith	PREPARING EXHIBITS FOR COURT REPORTS.	0.2	\$123.00	\$24.60
6/15/2016	Jere P. Cowan	EMAIL FROM R. MOORE AND FROM E. SINOR RE: STATUS REPORT; REVIEW SAME.	0.3	\$50.00	\$15.00
6/15/2016	Robert E. Moore, Jr.	CALL AND EMAIL WITH E. SINOR RE: FEE AND ACTIVITY REPORT; REVISE AND EMAIL TO C. SMITH FOR ACCOUNTING INFORMATION 2	0.2	\$153.00	\$30.60

Thursday, July 14, 2016



LAUREL HILLS WATER DISTRICT

June 2016

Date	Name	Description	Code	Amount	Total
6/16/2016	Robert E. Moore, Jr.	REVIEW PREVIOUS BID PACKAGE ON RBS GAS. REVIEW WECD WEBSITE ON CUMBERLAND COUNTY STATISTICS. DRAFT COVER LETTER. SYSTEM HISTORY AND CONFIDENTIALITY AGREEMENT. FORWARD FOR COMMENT AND REVIEW TO E. SINOR, J. BRYANT, C. SMITH 2.8	2.8	\$153.00	\$428.40
6/17/2016	Jere P. Cowan	ASSISTANCE WITH PREPARATION OF STATUS REPORT; REVIEW SAME. PREPARE EXHIBITS FOR SAME. CONFERENCE WITH C. SMITH RE: SAME AND RE: EXHIBITS NEEDED; EMAIL FROM T. STEPHENS SENDING DEPOSIT UPDATE. UPDATE FINANCIAL ACCOUNT RECORDS RE: SAME. SCAN EXHIBITS AND FORWARD REVISED REPORT AND EXHIBITS TO E. SINOR	1.3	\$50.00	\$65.00
6/20/2016	Cody C. Smith	UPDATE REGISTER AND RECONCILE BANK ACCOUNT THROUGH 6/20/16. EMAIL EVERETT SINOR. INVOICES. UPDATED BANK RECON. ALONG WITH WATER OPERATION NET ASSETS. DISCUSSION OVER DOCUMENTS WITH EVERETT AND R. MOORE.	1.4	\$123.00	\$172.20
6/20/2016	Jere P. Cowan	EMAIL FROM E. SINOR RE: NEEDED ASSET INFO FOR STATUS REPORT AND EXPENSE DETAILS; EMAILS RE: FINALIZING REPORT; CONFERENCES WITH C. SMITH RE: SAME	0.4	\$50.00	\$20.00
6/21/2016	Jere P. Cowan	RECEIPT AND PROCESS PAYMENT FOR UTILITIES. UPDATE FINANCIAL RECORDS	0.3	\$50.00	\$15.00
6/21/2016	Robert E. Moore, Jr.	REVISIONS TO BID PACKAGE. CALL WITH G. WILLIAMS RE: PIPE DIMENSIONS 1.5	1.5	\$155.00	\$229.50
6/22/2016	Jere P. Cowan	RECEIPT INVOICES FOR PAYMENT; REVIEW SAME; PREPARE PAYMENTS FOR SAME. UPDATE FINANCIAL RECORDS RE: SAME	0.2	\$50.00	\$10.00
6/22/2016	Robert E. Moore, Jr.	QUESTIONS FROM C. SMITH AND E. SINOR RE: FUNDS ACCOUNTING 2	0.2	\$153.00	\$30.60
6/24/2016	Cody C. Smith	CONFERENCE WITH EVERETT, R. MOORE, J. BRYANT TO DISCUSS INVOICES O/S THE TAX FILINGS WITH TERRY STEPHENS OFFICE AND ACCOUNT BALANCES BEFORE NEW WATER RATE FILING. LEFT VOICE MAIL AT TERRY STEPHENS, CPA OFFICE.	1.8	\$123.00	\$221.40
6/24/2016	Jere P. Cowan	ASSISTANCE WITH PREPARING BOND BID PROPOSAL PACKAGES FOR MAILING. CONFERENCE WITH R. MOORE RE: SAME.	0.5	\$50.00	\$25.00
6/24/2016	Jere P. Cowan	EMAIL FROM E. SINOR SENDING FINALIZED STATUS REPORT	0.1	\$50.00	\$5.00

Thursday, July 14, 2016

**LAUREL HILLS WATER DISTRICT**

**June 2016**

Date	Name	Description	Hours	Rate	Total
6/24/2016	Jere P. Cowan	ASSISTANCE WITH FINALIZING STATUS REPORTING FOR COURT FILING; EMAIL FROM E. SINOR RE: GRAMS AFFIDAVIT; CONFERENCE WITH R. MOORE RE: SAME; CONFERENCES WITH E. SINOR RE: SAME, FORWARD SAME.	1	\$50.00	\$50.00
6/24/2016	Robert E. Moore, Jr.	REVIEW AND DISCUSSION OF FINANCIAL DOCUMENTS AND BID PACKAGE 3; PREPARE AND ISSUE BID PACKAGE TO FIVE POTENTIAL BIDDERS. 4	0.7	\$153.00	\$107.10
6/27/2016	Cody C. Smith	EMAIL TERRY STEPHENS TO CONFIRM MAY & JUNE INVOICES ALONG WITH INVOICE ON TAX FILING FOR LHWD. DISCUSSION WITH R. MOORE OVER OUTSTANDING INVOICES.	0.3	\$123.00	\$36.90
6/27/2016	Jere P. Cowan	RECEIPT DEPOSIT INFORMATION FROM T. STEPHENS; UPDATE FINANCIAL RECORDS RE: SAME	0.2	\$50.00	\$10.00
6/27/2016	Robert E. Moore, Jr.	RECEIVE AND REVIEW EXECUTED CONFIDENTIALITY AGREEMENT FROM AQUA GREEN. CONFIRM RECEIPT TO D. KENDALL. RESPOND TO EMAIL FROM E. SINOR RE: BID PACKAGE TO AMERICAN WATER. 2	0.2	\$153.00	\$30.60
6/28/2016	Jere P. Cowan	RECEIPT FILED STATUS REPORT WITH CORRESPONDENCE FROM CLERK RE: ORDER DATE. CONFERENCE WITH R. MOORE RE: SAME; EMAIL TO E. SINOR RE: SAME	0.3	\$50.00	\$15.00
6/28/2016	Robert E. Moore, Jr.	PREPARE PACKAGE AND COVER LETTER FOR D. KENDALL AT AQUA GREEN. 4; DISCUSSION WITH J. COWAN RE: CORRESPONDENCE FROM CLERK AND MASTER FORWARD TO E. SINOR. 10	0.5	\$153.00	\$76.50
6/29/2016	Cody C. Smith	EMAIL EVERETT SINOR TERRY STEPHENS JUNE AND TAX INVOICE.	0.2	\$123.00	\$24.60
6/30/2016	Cody C. Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 06-30-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 06-30-16.	0.5	\$123.00	\$61.50
<b>Total</b>					<b>\$4,597.30</b>

G. Everett Sinor, Jr.  
Attorney at Law

July 1, 2016

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

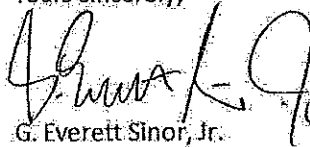
RE: June 2016 Billings – RMI/Laurel Hills Water System in Receivership

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

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

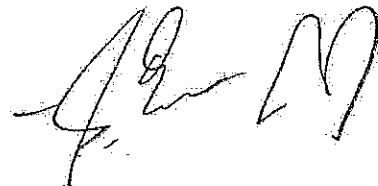
Yours sincerely,



G. Everett Sinor, Jr.  
Attorney at Law

Enclosure

E-mailed & mailed to  
RMI on 7/6/16



G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
6/1/2016	R Moore email on Moy Toy; T.C. w E Merrick re CPAD's position on Motion to Institute Rate; Preparation of Receivership Plan; motion, notice and proposed order; T.C. w R Moore & J Bryant re same; distribution of documents	3.9		
6/2/2016	Review of TRA filing on Laurel Hills show cause; review of J Moore email re: 6/9 hearing & conversation w D Kendall w Aqua Green Utility	0.1		
6/3/2016	Preparation and revisions of Hall & Schwerer Moy Toy/LHWS letter	0.5		
6/6/2016	T.C. w R Moore re rate hearing and plan of receivership hearing; T.C. w Heather @ Lansford & Stephens re Volunteer Electric bills; T.C. w Cody Smith @ RMI re insurance payment schedule & COUD wholesale water bills; T.C. w Scott Hall, Moy Toy counsel, re Thursday hearing and 4/12 request for information; email to R Moore re same	1.1		
6/8/2016	Drive to Crossville from Nashville; exchange of voice mails w R Schwerer re filing issues	2.1		
6/9/2016	Meeting w R Moore; Hearing on multiple motions in Crossville, TN; meetings w multiple interested persons on Renegade Mtn; mtg w R Moore; mtg w T Stephens; drive from Crossville to Nashville	8.5		
6/13/2016	Email to R Moore re Planning after hearing; T.C. w J Bryant re 5th report; T.C. w R Schwerer re numerous LHWS, Terra Mtn and Moy Toy matters; email from R Schwerer re conservation easement; email from R Schwerer re S Bozarth forwarding of easement doc and response to same	1.4		
6/14/2016	Preparation of Fifth Report & ancillary docs; email to M McClung re proper address for notice; transmission of draft of report to RMI for review;	1.2		
6/15/2016	Revisions and 2nd draft of fifth report; email from J Bryant re fifth report & response to same re: Moy Toy letter; response to J Moore email on R Moore's testimony at 6/9 hearing; T.C. w R Moore to discuss a minor revision to 5th report	1.3		
6/16/2016	Email from J Moore & response re hearing; review of bid package; T.C. w G Williams re water testing & contract; email w R Moore re testing, bid package & G Williams agreement	1.0		
6/17/2016	T.C. w Johnny Walker @ TDEC re latest TDEC report on LHWS	0.1		
6/20/2016	Review of TDEC report on LHWS & email to R Moore re same; clean up on fifth report	0.8		

6/21/2016	Review of R Moore email on bid package; T.C. w E Bolin re COUD/LHWS contract; review revisions to bid package; email to R Moore w additional suggested revisions to bid package; review of A/R summary from Heather @ Lansford & Stephens; work w C Smith to finalize fifth report	1.4		
6/22/2016	Review R Moore email on J Lawson expenses; T.C. w S Bozarth & R McGehee re fifth report process; modification of TRA affidavit to reflect Kelly Cashman-Grams as proper affiant; revisions to fifth report; T.C. w C Smith re same; finalize fifth report & email to TRA for review	0.5		
6/23/2016	Review of email from Heather & T Stephens' office re deposit	0.1		
6/24/2016	T.C. w Kelly Cashman-Grams re affidavit; email to R Moore re same; T.C. w R Moore re same; cover letter for fifth report and motion; mtg. w J Bryant, R Moore & C Smith re LHWS matters; email report to certificate list and interested parties; T.C. w Kelly Johnston @ AJG re insurance payment schedule; email to R Moore with addresses of potential LHWS suitors.	1.1		
6/27/2016	Review Order Withdrawing Counsel of Ben Gastel; T.C. w Chy Butts re: Gina _____ request for water; Review of letter from R Moore to potential suitors of LHWS; email to R Moore re American Water	0.1		
6/28/2016	Email from J Cowan re communication from Cumberland County C&M	0.1		
6/29/2016	Email from Connie & Cumberland Co. C&M w Docket call information; TC w Connie re same	0.1		
6/30/2016	Email to C Smith re taxes for LHWS; email to Heather @ T Stephens office re notice to customers; T.C. w Heather re same; preparation of insert for LHWS bills; review of Lansford & Stephens email re deposit & notice of cancellation on insurance; T.C. w M Hargis re insurance; T.C. w R Moore re insurance and insert	0.7		

**Hourly Billing Total**

**26.1      \$140.00      \$3,654.00**

**Mileage Total**

Miles      Rate  
**0.0      \$0.47      \$0.00**

6/1/2016	Postage for Receivership Plan & Motion Filing	\$91.82
6/8/2016	Lodging at Baymont Inn in Crossville, Tenn.	\$93.79
6/8/2016	Travel Day Meals Per Diem	\$29.25

6/9/2016	Travel Day Meals Per Diem	\$29.25	
	<b>Other Expenses Reimburseable Total</b>		<b>\$244.11</b>
	<b>Balance Owed this month</b>		<b>\$3,898.11</b>
	<b>Previous Balance Owed</b>	<b>\$20,215.71</b>	
	<b>Total Amount Due and Payable</b>		<b>\$24,113.82</b>

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



**BAYMONT CROSSVILLE**

4038 HIGHWAY 127 NORTH  
CROSSVILLE, TN 38571 US

Phone: (931) 456-9338

Fax: (931) 456-8758

Email: rajpatel@baymontinncrossville.net

Printed: 6/9/2016 8:01:56 AM

**Folio (Detailed)**

Name:	SINOR, GEORGE	Confirmation Number:	71476868
		Account Number:	160-283442
		WyndhamRewards #:	151571931B
Address:	3504 ROBIN RD NASHVILLE, TN 37204 US		
Room:	319	Room Type:	NK1, Nights: 1 Guests: 2/0
Rate Plan:	RACK	Daily Rate:	\$79.99 + \$13.80 Tax GTD: MC - MASTER CARD
Arrival:	6/8/2016 (Wed)	Departure:	6/9/2016 (Thu) XXXX XXXX XXXX 8930

Room Rate:  
6/8/2016 (Wed) - 6/8/2016 (Wed) \$79.99 + \$13.80 Tax per night.

Date	Code	Description	Amount	Balance
6/8/2016	RM	ROOM CHARGE	\$79.99	\$79.99
6/8/2016	TAX1	STATE TAX	\$7.80	\$87.79
6/8/2016	TAX2	CITY TAX	\$6.00	\$93.79
6/9/2016	MC	MASTER CARD XXXX XXXX XXXX 8930	(\$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

By signing below, I agree to these terms and conditions.

**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/Privacy, Wyndham Hotel Group, LLC, 22 Sylvan Way, Parsippany, NJ 07054 to opt out. View our website about privacy."

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

06/01/16 04:58 PM

We are the one stop for all your  
shipping, postal and business needs.

'LIKE US' on FACEBOOK: THE UPS STORE 3355  
COUPONS, SPECIALS, FACEBOOK FRIDAY!!



001 500051 (022) TO \$ 13.10

First Class Mail QTY 5  
Reg Unit Price \$ 2.62

002 500051 (022) TO \$ 50.48

First Class Mail QTY 4  
Reg Unit Price \$ 12.62

003 001005 (001) TO \$ 28.24

NDA

Tracking# 1Z66321F0198030230

SubTotal \$ 91.82

Total \$ 91.82

Master Card \$ 91.82

ACCOUNT NUMBER \* \*\*\*\*\*8930

Appr Code: (S) Sale

Receipt ID: 83997713798564888520 010 Items  
CSH: JOEY Tran: 0987 Reg: 001

RETURN W/ RECEIPT FOR 15% OFF NXT PURCHASE  
(excludes USPS). EXPIRES 1 WEEK FROM TODAY!

Whatever your business and personal  
needs, we are here to serve you.

US Postal Rates Are Subject to Surcharge

We're here to help.  
Join our FREE email program to receive  
great offers and resources.

[www.theupsstore.com/signup](http://www.theupsstore.com/signup)



Gerald Williams  
98 Wallop Lane  
Crossville, Tenn. 38571

Date 6/9/2016  
Invoice # 406  
P.O. #

LAUREL HILLS CONDO ASSN.  
P.O. Box 288  
Crab Orchard, Tenn. 37723

Quantity	Description	Price	Total
	WATER SERVICES MAY 2016	\$	500.00
30 days	# 404 APRIL '16	\$	500.00
60 days	# 403 March '16		\$500.00
90 days	# 401 February '16		\$500.00
120 days	# 400 January '16		\$500.00
150 days	# 399 December '15		\$500.00
	PAST DUE		
	Sub Total	\$	3,000.00
	Tax	\$	-
	Total	\$	3,000.00

*Oliver*  
*R.S.M.*  
*6-10-2016*

*Thank You and Have A Great Day!*  
*Please return a copy of this invoice with your payment.*

Gerald Williams  
98 Wallop Lane  
Crossville, Tenn. 38571

Date 7/11/2016  
Invoice # 408  
P.O. #

LAUREL HILLS CONDO ASSN.  
P.O. Box 288  
Crab Orchard, Tenn. 37723

Quantity	Description	Price	Total
1	Water services for June		\$500.00
Total			\$ 500.00

*Thank You and Have A Great Day!*  
*Please return a copy of this invoice with your payment.*

LANSFORD & STEPHENS  
CERTIFIED PUBLIC ACCOUNTANTS  
92 Rockwood Avenue  
Crossville, Tennessee 38555

#5368

May 31, 2016

Laurel Hills Receivership  
PO Box 288  
Crab Orchard, TN 37723

#16680

April 2016 accounting

\$ 300.00

- Sp for ~~May~~  
May 2016 -  
Approved -

April was already  
Approved  
REM  
6-8-2016

ZHWD

LANSFORD & STEPHENS  
CERTIFIED PUBLIC ACCOUNTANTS  
92 Rockwood Avenue  
Crossville, Tennessee 38555

May 31, 2016

#5368

Laurel Hills Receivership  
PO Box 288  
Crab Orchard, TN 37723

#16680

May 2016 accounting

\$ 300.00

LANSFORD & STEPHENS  
CERTIFIED PUBLIC ACCOUNTANTS  
92 Rockwood Avenue  
Crossville, Tennessee 38555

#5368

June 28, 2016

Laurel Hills Receivership  
PO Box 288  
Crab Orchard, TN 37723

---

#16713

---

Retainer billing for preparation of 2015 tax return

400.00

*Just for  
REM  
7-7-2016*

LANSFORD & STEPHENS  
CERTIFIED PUBLIC ACCOUNTANTS  
92 Rockwood Avenue  
Crossville, Tennessee 38555

#5368

June 28, 2016

Laurel Hills Receivership  
PO Box 288  
Crab Orchard, TN 37723

#16712

---

June 2016 accounting \$ 300.00

Charges for additional mailouts 280.00

---

\$ 580.00

*JK Stephens*

RMI EXP RECOVERABLE LHWD  
6/1/16 Through 6/30/16

Category Description	6/1/16- 6/30/16	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-476.80	-476.80
5610-CONTRACT LABOR RMI	-4,089.10	-4,089.10
5690-RMI OH EXPENSE	-553.00	-553.00
TOTAL 5100 FEES RMI	-5,118.90	-5,118.90
5150 FEES LEGAL		
5400-LEGAL FEES	-3,898.11	-3,898.11
TOTAL 5150 FEES LEGAL	-3,898.11	-3,898.11
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-73.80	-73.80
6210-POSTAGE	-40.06	-40.06
6222-TELEPHONE LONG DISTANCE	-44.00	-44.00
TOTAL 5300 EXPENSES	-193.32	-193.32
OVERALL TOTAL	-9,210.33	-9,210.33

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560  
Chancellor Thurman

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE        )  
  )  
COUNTY OF DAVIDSON        )

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

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval of Fees and Expenses and Interim Taxation of Costs.
2. I am the General Counsel for the Tennessee Regulatory Authority in this matter. Pursuant to Tennessee law, the Tennessee Regulatory Authority took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.
3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of June 1, 2016 through June 30, 2016, and the fees and expenses of Mr. Gerald Williams and

To be Exhibited  
E



of Lansford & Stephens, and the CNA Insurance Company invoice, that are contained in this filing.

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

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

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

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

*[intentionally blank]*

8. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court order payment of those amounts as an interim taxation of costs in this matter.

FURTHER THE AFFIANT SAITH NOT.

---

KELLY CASHMAN GRAMS

---

Sworn to and subscribed before me this

\_\_\_\_\_ day of \_\_\_\_\_, 2016.

---

NOTARY PUBLIC

My commission expires: \_\_\_\_\_

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560  
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE        )  
  )  
COUNTY OF DAVIDSON        )

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

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval 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 been responsible for 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 interim fees and expenses in the LHWS Receivership. The Receiver's Motion seeks approval of the amount of fees and expenses incurred for the period of time between June 1, 2016 and June 30, 2016, and the fees and

To be  
Exhibit  
B

expenses of Mr. Gerald Williams and of Lansford & Stephens, and the outstanding invoice from CNA Insurance Company, 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, as well as the fees for Mr. Gerald Williams and for Lansford & Stephens. 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 does not appear that there are assets available for matters beyond the operational needs of LHWS. There are not sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion. Accordingly, and pursuant to the Court's Amended Order Appointing Receiver, it is requested that the Court order an interim taxation of costs to the Tennessee Regulatory Authority in the amount of \$12,760.42 (i.e., the amount of fees and expenses set forth in the Receiver's Motion).

**FURTHER THE AFFIANT SAITH NOT.**

\_\_\_\_\_  
ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
Notary Public

Commission Expires: \_\_\_\_\_

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560  
Chancellor Thurman

---

AFFIDAVIT OF KELLY CASHMAN-GRAMS

---

STATE OF TENNESSEE        )  
  )  
COUNTY OF DAVIDSON        )

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

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

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

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

of Lansford & Stephens, and the CNA Insurance Company invoice, that are contained in this filing.

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

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

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

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

*[intentionally blank]*

8. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court order payment of those amounts as an interim taxation of costs in this matter.

**FURTHER THE AFFIANT SAITH NOT.**

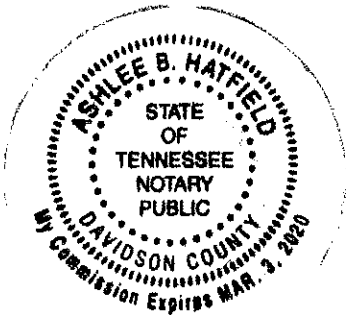
  
\_\_\_\_\_  
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

26<sup>th</sup> day of July, 2016.

  
\_\_\_\_\_  
NOTARY PUBLIC

My commission expires: March 3, 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.

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 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 been responsible for 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.

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expenses of Mr. Gerald Williams and of Lansford & Stephens that are contained in the Receiver's motion.

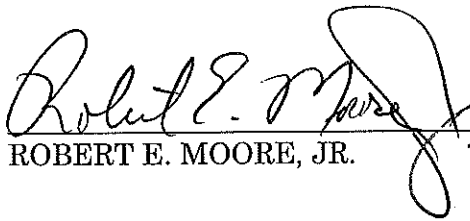
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide services on this receivership, as well as the fees for Mr. Gerald Williams and for Lansford & Stephens. 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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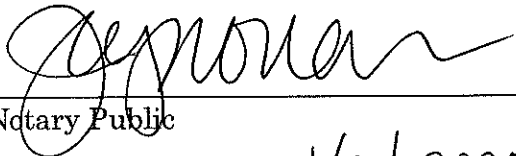
6. Based upon an initial review of financial documentation for LHWS, it does not appear that there are assets available for matters beyond the operational needs of LHWS. There are not sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion. Accordingly, and pursuant to the Court's Amended Order Appointing Receiver, it is requested that the Court order an interim taxation of costs to the Tennessee Regulatory Authority in the amount of \$12,760.42 (i.e., the amount of fees and expenses set forth in the Receiver's Motion).

FURTHER THE AFFIANT SAITH NOT.

  
ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this

1<sup>st</sup> day of August, 2016.

  
Notary Public

Commission Expires: 1/6/2020



G. EVERETT SINOR, JR.  
Attorney at Law

August 1, 2016

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

Date 8-4 FILED 2016 at 12:30  
AM  
PM  
Entered \_\_\_\_\_  
SUE TOLLETT, CLERK & MASTER  
Cumberland County, Crossville, TN  
BY G

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

VIA UNITED STATES FIRST CLASS MAILS

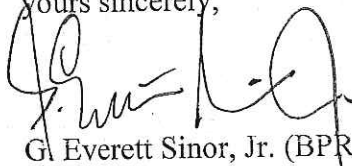
Dear Ms. Tollett:

In my letter, transmitted earlier today on August 1, 2016, I neglected to enclose two (2) items. They are:

1. A copy of the CNA invoice referenced on page 6, paragraph 15 of the sixth report; and,
2. A proposed order, properly executed as prepared for entry.

I apologize for the confusion. 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.

Reid - 8/5/16



Account Number: 3030879561  
 Invoice Date: 07/19/16  
 Invoice Number: 0015698668

Billing Questions: 877-276-7507  
 Mon-Fri 7:00am - 7:00pm Central Time

Invoice - CNA Direct

INVOICE SUMMARY

Previous Balance 06/17/16	\$6,342.43
Payment/Adjustment 07/01/16	-\$6,342.43
Balance Forward	\$0.00
New Charges - Due 08/10/16	\$1,270.09
<b>Total Amount Due</b>	<b>\$1,270.09</b>

LAUREL HILLS WATER SYSTEM IN RECEIVE  
 1101 KERMIT DR  
 SUITE 735  
 NASHVILLE TN 37217-5100

Agent/ ARTHUR J GALLAGHER RISK MGT SVCS INC  
 Broker: BRENTWOOD, TN  
 615-661-7500

NEW CHARGES SUMMARY - Due 08/10/16

COVERAGE	COUNT	PAST DUE	NEW CHARGES	AMOUNT DUE	ACCOUNT BAL
General Liability	1	\$0.00	\$1,263.09	\$1,263.09	\$8,841.57
Account Fees	-	\$0.00	\$7.00	\$7.00	\$7.00
<b>Totals</b>		<b>\$0.00</b>	<b>\$1,270.09</b>	<b>\$1,270.09</b>	<b>\$8,848.57</b>

Unpaid premiums for which CNA has no written evidence of dispute will be subject to cancellation for non-payment of premiums. If you have any questions about your invoice, please call 877-276-7507 or visit www.cna.com/cnaindirect for account terms and conditions.

If you would like to pay your entire account balance, including future installments of \$7,578.48, pay \$8,848.57 by 08/10/16.

IMPORTANT NOTICE

If we do not receive the total amount due to retain current policy coverage by the due date on this invoice,

- \* You may be charged a late fee.
- \* The due date of your next installment will be due immediately.

This invoice includes policies or transactions processed as of 07/19/16. Any policies or transactions processed after this date will appear on future invoices.

Date 8.4 FILED 2016 at 12:30 AM  
 Entered: \_\_\_\_\_  
 SUE TOLLETT, CLERK & MASTER  
 Cumberland County, Crossville, TN  
 BY GT

Continental Casualty Company serves as the payment agent for the underwriting company that issued your policy. CNA is the registered trademark of CNA Financial Corporation.



Account Number: 3030879561  
 Invoice Number: 0015698668  
 Amount Due: \$1,270.09

Please include your account number with payment.

CNA INSURANCE  
 PO BOX 790094  
 ST. LOUIS MO 63179-0094



000042030308795613900149200000000000106



PO BOX 790094  
ST. LOUIS MO 63179-0094

Account Number: 3030879561  
Invoice Date: 07/19/16

Invoice Number: 0015698668  
LAUREL HILLS WATER SYSTEM IN RECEIVE

Billing Questions: 877-276-7507  
Mon-Fri 7:00am - 7:00pm Central Time

**BILLING DETAIL - Due 08/10/16**

Agent/ **ARTHUR J GALLAGHER RISK MGT SVCS INC**  
Broker: 5500 MARYLAND WAY SUITE 330  
BRENTWOOD TN 37027-4976  
615-661-7500

COVERAGE	POLICY/TRANS	EFF DATE	DESCRIPTION	AMOUNT DUE \$	ACCOUNT BAL \$
GL	6024574369	05/10/16	American Casualty Co	1,263.09	8,841.57
Occurrence	New Business	05/10/16	Installment 04 of 10	1,263.09	
Account	Fees	07/19/16		7.00	7.00
	Fee	07/19/16	Installment Fee	7.00	
<b>Totals</b>				<b>\$1,270.09</b>	<b>\$8,848.57</b>

If you would like to pay your entire account balance, including future installments of \$7,578.48, pay \$8,848.57 by 08/10/16.

Pay your bill online at [www.cna.com](http://www.cna.com)

Visit [www.cna.com/cnadirect](http://www.cna.com/cnadirect) for direct bill terms and conditions

Pay by phone: 877-276-7507. Our automated phone system is available 24/7  
Representatives are available Mon - Fri 7:00am - 7:00pm Central Time

Report a claim: 877-262-2727. Representatives are available 24/7

Change your billing address:  
Email your account number and new address to [AddressChange@cna.com](mailto:AddressChange@cna.com)

Pay by mail:  
CNA Insurance, Lockbox Number 790094  
1005 Convention Plaza, St. Louis, MO 63101

RECEIVED  
8-4-16

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

TENNESSEE REGULATORY AUTHORITY

v.

LAUREL HILLS CONDOMINIUMS  
PROPERTY OWNERS ASSOCIATION

Docket No. 2012-CH-560  
Chancellor Thurman

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ORDER GRANTING RECEIVER'S MOTION

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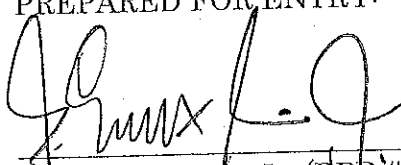
On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the \_\_\_ day of August, 2016, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for June of 2016, and tax costs on an interim basis in the amount of such fees and expenses to the Plaintiff, the Tennessee Regulatory Authority.

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 \$12,760.42, and costs are taxed on an interim basis to the Plaintiff, the Tennessee Regulatory Authority, in said amount.

ENTERED this \_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



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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:

Kelly Cashman-Grams, Esq.  
General Counsel  
Tennessee Regulatory Authority  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

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

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

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

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

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

via the United States Mails, postage prepaid, this \_\_\_\_ day of \_\_\_\_\_, 2016.