

G. EVERETT SINOR, JR.
Attorney at Law

June 24, 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

VIA UNITED STATES FIRST CLASS MAILS

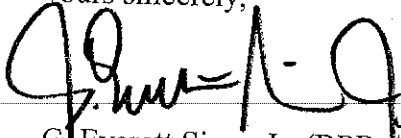
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Fifth 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,

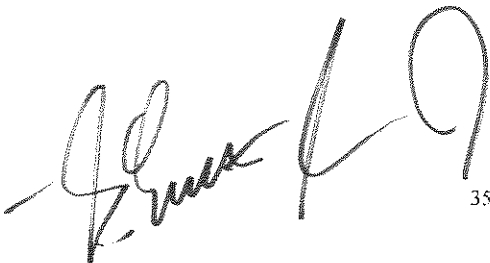


G. Everett Sinor, Jr. (BPR #017564)
Attorney at Law

Enclosures

cc: Receivership Management, Inc.
Shiva K. Bozarth, Esq.
Laurel Hills Condominiums POA
Melanie Davis, Esq.
Vance Broemel, Esq.
Roger York, Esq.

Mailed + e-mailed to
6/24/16
E-mailed to R. Schaner &
S. Hall on 6/29/16



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

6-27 FILED

2016

1:23 AM (PM)

Entered

SUE TOILETT, CLERK & MASTER
Cumberland County, Crossville, TN

BY

RECEIVER'S FIFTH REPORT, MOTION FOR APPROVAL OF FEES AND
EXPENSES AND 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 the Receiver's Fifth 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, 2015.¹

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 ¶ 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, and fourth report with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, and May 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.

Receiver's Activity Report & Operational Status of the LHWS

3. Since the filing of these reports, representatives of the Receiver, Robert E. Moore, Jr. and G. Everett Sinor, Jr., have formulated a plan for the receivership estate, and provided an accounting to the Court.

4. The Accounting was filed with this Honorable Court on May 27, 2016, as required by the Amended Order Appointing Receiver.²

5. The Receivership Plan was filed with this Honorable Court on June 2, 2016, as required by the Amended Order Appointing Receiver.³ A motion to adopt the Receivership Plan was heard on June 9, 2016, and was adopted by the Court on that same day. Mr. Moore has started the process of developing bid packages for potential suitors of the LHWS, consistent with the adopted Plan.

6. The Receiver filed a motion to institute a new, emergency rate for the LHWS—that motion was also heard on June 9, 2016. This Honorable Court granted the Receiver's motion on that day, and a new, emergency rate for LHWS customers of \$114.24

² See Amended Order Appointing Receiver, entered on April 21, 2016, at ¶ 12, p. 6.

³ Id., at ¶ 15, pp. 7-8.

per month will be instituted on July 1, 2016, as ordered by the Court and consistent with said order.

Financial Information

7. As noted above, as of July 1, 2016, all water system customers will be invoiced \$114.24 per month, consistent with the newly adopted emergency rate. Currently, there are seven (7) LHWS billed customers who consistently do not pay their water bill. The Receiver has concern that, with the newly adopted emergency rate, that number may rise. As of June 21, 2016, there was an accounts receivable balance of \$2085.80. A copy of the Accounts Receivable Aging Summary, calculated as of the end of June 21, 2016, is attached hereto as Exhibit A and is incorporated herein by reference.

8. On a cash basis, LHWS had a net gain in May 2016 of \$6397.80. See Exhibit B, attached hereto and incorporated herein by reference. As of May 31, 2016, LHWS had a \$11,384.32 balance in its main operating account. See Collective Exhibit C, attached hereto and incorporated herein by reference.

9. As previously reported, the LHWS lacks the cash to meet current obligations. This should be remedied by the new emergency rate once applied, so long as the majority of LHWS customers continue to pay their water bill. The LHWS owed Crab Orchard Utility District \$7360.85 for wholesale water as of May 31, 2016, and owed \$490.83 to Volunteer Electric Company as of May 31, 2016. Both of these bills have now been paid. Past due balances with Lansford & Stephens for accounting services, and with Mr. Gerald Williams for engineering services, were included in the "Fees and Expenses for Receiver" section of the Receiver's fourth report, and should be satisfied once payment is received from the Authority for those services, as ordered by this Honorable Court on June 9, 2016.

Ownership and Control of Water System Properties in Question

10. 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 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.

11. 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. The Receiver has still not received a substantive response to Mr. Sinor's April 12, 2016 letter from Moy Toy, LLC.

12. A copy of all correspondence referenced in the previous two (2) paragraphs is attached hereto as Collective Exhibit D and is incorporated herein by reference.

13. Both Mr. Hall and Mr. Schwerer have contacted counsel for the Receiver, Mr. Sinor, by telephone since he sent his June 3, 2016 letter to them.⁴ Neither Mr. Hall nor Mr.

⁴ Mr. Hall telephoned and spoke with Mr. Sinor on June 6, 2016. Mr. Schwerer telephoned and spoke with Mr. Sinor on June 13, 2016.

Schwerer have formally responded in writing to the substantive issues raised in Mr. Sinor's April 12, 2016 letter as of the date this report has been drafted.

Fees and Expenses of Receiver

14. Pursuant to the Amended Order Appointing Receiver, compensation for the Receiver is payable from funds or assets of the LHWS, if such funds are available. If the funds or assets of the LHWS are not available to pay Receivership fees and costs, then those fees and costs are to be taxed as interim court costs to be paid by the Authority. The Receiver is to submit invoices to the Authority on a monthly basis for approval. These invoices are reviewed and paid after approval of the Authority and the Court, through interim taxation of costs, if necessary.⁵

15. As shown in Collective Exhibit E, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, Chief Operations Officer of the Receiver, and other persons at the Receiver's office, including Ms. Jeanne Bryant, Mr. Cody Smith, and Ms. Jere Cowan, performed work for this Receivership for the period of May 1, 2016 through May 31, 2016 in the amount of \$9308.05.⁶ Those working on contract for the Receiver under Mr. Moore (Mr. Sinor & Ms. Lawson) have performed work for the Receivership and have incurred fees and expenses as shown in Collective Exhibit E for the period May 1, 2016 through May 31, 2016 in the amount of \$9436.33.

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*

⁵ *See* Amended Order Appointing Receiver, entered on April 21, 2016, at ¶ 10, pp. 4-6.

⁶ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of May 1, 2016 through May 31, 2016, which total \$1472.70.

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 May of 2016: \$9308.05; and,
- b. Invoices for those working under Mr. Moore for May of 2016: \$9436.33.

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.

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

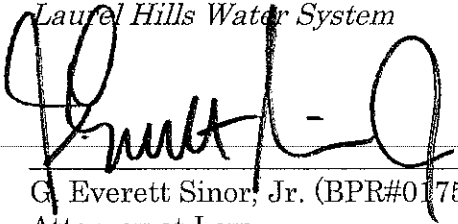
Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the payment of fees and expenses as set forth in the aggregate amount of \$18,744.38, and further **MOVES** this Court to tax costs to the Authority on an interim basis in said aggregate amount.

Respectfully Submitted,

Laurel Hills Water System in Receivership

By: 

Robert E. Moore, Jr. (BPR#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. (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:

Shiva K. Bozarth, Esq.
Chief of Compliance
Counsel for Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

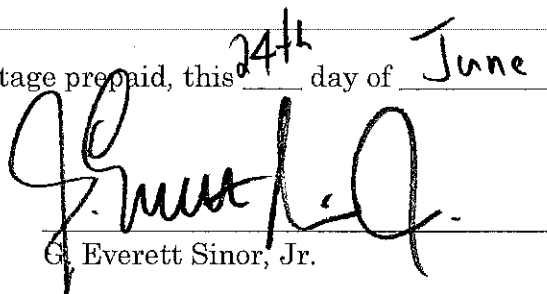
Laurel Hills Condominiums
Property Owners Association
Post Office Box 78
Crab Orchard, Tennessee 37723

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

Vance Broemel, Esq.
Erin Merrick, 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 24th day of June, 2016.

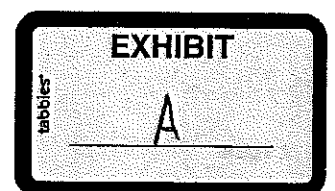

G. Everett Sinor, Jr.

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06/21/16

Laurel Hills Condos In Receivership
A/R Aging Summary
As of June 21, 2016

| | Current | 1 - 30 | 31 - 60 | 61 - 90 | > 90 | TOTAL |
|-------------------------------|-------------|---------------|---------------|--------------|-----------------|-----------------|
| BENSON, CYNTHIA L | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| CECCHETT, DON & DIANNE | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| CHAMBERS, BARRY | 0.00 | 33.10 | 33.10 | 33.10 | 165.50 | 264.80 |
| DEPEW, MICHAEL (Running Deer) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| DOUGLAS, JIMMY & JACKIE | 0.00 | 33.10 | 33.10 | 0.00 | 0.00 | 66.20 |
| ELLIS, ALVIN | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| HEIRS, LUKE & ANNA DUNN | 0.00 | 33.10 | 33.10 | 0.00 | 0.00 | 66.20 |
| HENMAN, MIKE | 0.00 | 33.10 | 33.10 | 0.00 | 0.00 | 66.20 |
| MATERDOMINI, DINA | 0.00 | 33.10 | 33.10 | 0.00 | 0.10 | 66.30 |
| MCCLUNG, MICHAEL (#5101) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| MCCLUNG, MICHAEL (#5102) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| MCCLUNG, MICHAEL (#5103) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| MITCHELL SHARON | 0.00 | 33.10 | 33.10 | 33.10 | 662.00 | 761.30 |
| MURPHY, JEFF | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| NEALE, MIKE | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| PETERS, JOHN (1) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| PETERS, JOHN (2) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| PETERS, JOHN (3) | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| SCHLABATH, DAVID & CHRISTY | 0.00 | 33.10 | 33.10 | 0.00 | 0.00 | 66.20 |
| SCHWARTZ, ROBERT | 0.00 | 0.00 | 0.00 | 0.00 | 298.30 | 298.30 |
| ZABELNY, LOUIS & RENEE TODD | 0.00 | 33.10 | 0.00 | 0.00 | 0.00 | 33.10 |
| TOTAL | 0.00 | 662.00 | 231.70 | 66.20 | 1,125.90 | 2,085.80 |



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 |
| RECEIPTS | | | |
| 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 |
| DISBURSEMENTS | | | |
| FEES | | | |
| 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 |
| OTHER EXPENSES: | | | |
| 5697-OTHER FEES | 100.00 | - | 100.00 |
| 6060-RENT | - | - | - |
| 6190-EQUIPMENT MAINTENANCE | 349.78 | 553.10 | 902.88 |
| 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 | - | 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 |
| SCHEDULE OF CHANGE IN NET ASSETS | | | |
| 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 |

6/17/2016 10:44

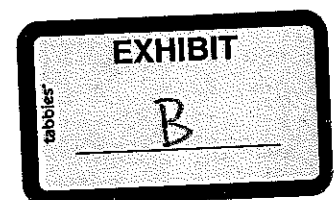
| | | |
|-------------------|----------|-----------|
| TOTAL ASSETS | 4,986.52 | 11,384.32 |
| TOTAL LIABILITIES | | |
| NET ASSETS | 4,986.52 | 11,384.32 |

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



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

5/31/2016

OPERATING BANK ACCOUNT

| | BALANCE PER BANK STMT | BALANCE PER GENERAL LEDGER |
|--|--------------------------|-------------------------------|
|--|--------------------------|-------------------------------|

END OF MONTH AC 232618611
END OF MONTH AC 232618638
OUTSTANDING CHECKS

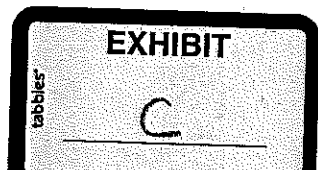
| | | |
|--|-----------|-----------|
| | 11,396.32 | 11,384.32 |
| | (12.00) | |
| | - | |

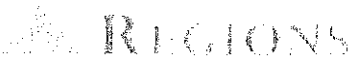
| | | |
|--|------------------|------------------|
| | <u>11,384.32</u> | <u>11,384.32</u> |
|--|------------------|------------------|

21-Jun-16
08:15 AM

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
 April 30, 2016 through May 31, 2016

SUMMARY

| | | | | |
|--------------------------|--------------------|---|------------------------|----------------|
| Beginning Balance | \$5,478.30 | | Minimum Balance | \$4,610 |
| Deposits & Credits | \$6,950.90 | + | Average Balance | \$7,608 |
| Withdrawals | \$0.00 | - | | |
| Fees | \$0.00 | - | | |
| Automatic Transfers | \$0.00 | + | | |
| Checks | \$1,032.88 | - | | |
| Ending Balance | \$11,396.32 | | | |

DEPOSITS & CREDITS

| | | |
|-------------------------------------|---------------------|-------------------|
| 05/06 | Deposit - Thank You | 165.50 |
| 05/13 | Deposit - Thank You | 3,475.40 |
| 05/25 | Deposit - Thank You | 3,310.00 |
| Total Deposits & Credits | | \$6,950.90 |

CHECKS

| <u>Date</u> | <u>Check No.</u> | <u>Amount</u> | <u>Date</u> | <u>Check No.</u> | <u>Amount</u> |
|---------------------|------------------|---------------|-------------|------------------|-------------------|
| 05/05 | 1026 | 130.00 | 05/09 | 1031 | 553.10 |
| 05/06 | 1030 * | 349.78 | | | |
| Total Checks | | | | | \$1,032.88 |

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY

| <u>Date</u> | <u>Balance</u> | <u>Date</u> | <u>Balance</u> | <u>Date</u> | <u>Balance</u> |
|-------------|----------------|-------------|----------------|-------------|----------------|
| 05/05 | 5,348.30 | 05/09 | 4,610.92 | 05/25 | 11,396.32 |
| 05/06 | 5,164.02 | 05/13 | 8,086.32 | | |

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

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

June 3, 2016

Scott D. Hall, Esq.
105 Bruce Street
Sevierville, Tennessee 37862

Robert V. Schwerer, Esq.
Hayskar Walker
Attorneys at Law
Renaissance Financial Center, Suite 304
130 South Indian River Drive
Fort Pierce, Florida 34950

RE: *Laurel Hills Water System in Receivership*

VIA UNITED STATES FIRST CLASS MAILS

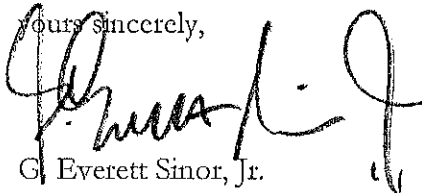
Gentlemen:

On April 12, 2016, I sent a letter to Mr. Greg Logue, thinking he was counsel for Moy Toy, LLC for purposes of the Laurel Hills Water System in Receivership matter. Mr. Logue responded on May 31, 2016, in which he indicated that the issues raised should be directed to Moy Toy's Florida counsel, Mr. Rob Schwerer. Later on May 31, 2016, Mr. Schwerer sent me an electronic mail in which he states that he understands that Mr. Scott Hall is Moy Toy's attorney "relative to any water system issues". Mr. Schwerer also provided some information relative to the Laurel Hills Water System in Receivership, but which was not fully responsive to my request for information.

Accordingly, please fully respond to my April 12, 2016 letter on Moy Toy, LLC's behalf. For your ready reference, all communications referenced above are enclosed herewith.

Thanking you for your consideration of this matter, I am,

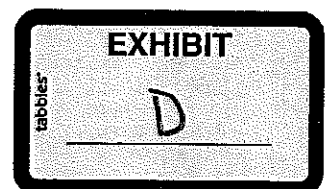
Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosures

cc: Receivership Management, Inc.
Gregory C. Logue, Esq.



G. Everett Sinor, Jr.
Attorney at Law

April 12, 2016

Gregory C. Logue, Esq.
Woolf, McClane
Attorneys at Law
900 Riverview Tower
900 South Gay Street
Knoxville, Tennessee 37902-1810

Mailed on 4/12/16
G. Sinor

RE: *Laurel Hills Water System in Receivership*

DELIVERY BY UNITED STATES FIRST CLASS MAILS

Dear Mr. Logue:

I was forwarded a copy of a letter you sent to Melanie Davis, dated March 9, 2016, regarding the Eagle's Nest development on Renegade Mountain in Cumberland County, Tennessee. In that letter, you state that you represent Moy Toy, LLC, and you seek information and assurances from Eagle's Nest regarding digging on your client's property. A copy of that letter is enclosed herewith for your ready reference.

I represent Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed receiver for the Laurel Hills Water System in Receivership [hereinafter the "LHWS"]. A copy of the original Order Appointing Receiver, dated October 26, 2015, is enclosed herewith for your ready reference. Your letter to Ms. Davis raises questions and concerns as to the ability of the Receiver to service the existing water customers of the LHWS, and to expand the LHWS to provide potable water to other current and potential landowners on Renegade Mountain.

The Receiver has a number of questions regarding the LHWS it would like your client, Moy Toy, LLC, to answer, concerning its interests on Renegade Mountain, all focused on the same, central issues:

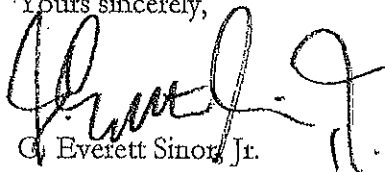
1. What rights does Moy Toy, LLC now assert or intend to assert with respect to the LHWS?
2. The Receiver understands that there are numerous, unimproved, single-owner lots, whereby an owner may seek to build a home and seek to tap onto the LHWS to receive potable water. What is Moy Toy, LLC's position with respect to an owner who wishes to have potable water delivered to their home via a tap onto the LHWS?
3. Will the LHWS be hindered in any way from providing potable water to any new home on Renegade Mountain that wishes to receive such water from the LHWS?
4. Does Moy Toy, LLC take the position that any person that desires to tap onto the LHWS must first obtain permission, rights, or anything else of value from Moy Toy, LLC or any other person prior to tapping onto the LHWS and receiving potable water from the LHWS?
5. Do you intend to take any action to enjoin or otherwise prevent Eagle's Nest, LLC, or any other current LHWS customer from receiving potable water from the LHWS?
6. Are there any other persons or entities of which Moy Toy, LLC is aware that might take issue with the delivery of potable water to current or potential LHWS customers and hinder

the ability of the LHWS to deliver such water to any current or potential LHWS customer, including but not limited to Terra Mountain Holdings, LLC, Standing Rock, LLC, or any of their owners, parents, subsidiaries, affiliates, or other related entities? If any such entities exist, please provide information on how they can be contacted.

7. In your opinion, do the following conveyances provide the LHWS with the ability to both operate the entire LHWS without hindrance and expand the LHWS without hindrance on the entirety of Renegade Mountain: (a) the quitclaim deed from Moy Toy, LLC to Receivership Management, Inc., dated February 3, 2016; (b) the irrevocable license from Moy Toy, LLC to Laurel Hills Condominium Property Owners' Association, dated February 3, 2016; and (c) the assignment and bill of sale from Laurel Hills Condominiums Property Owners' Association to Laurel Hills Water System in Receivership, dated April 5, 2016, a copy of which is enclosed herewith for your ready reference?

Mr. Logue, thank you for your consideration of this matter. If you have any questions about any of the issues raised in this letter, please do not hesitate to contact me. I look forward to receiving your response.

Yours sincerely,



C. Everett Sinor, Jr.
Attorney at Law

Enclosures

ec: Receivership Management, Inc.



WOOLF • McCLANE

WOOLF, McCLANE, BRIGHT, ALLEN & CARPENTER, PLLC

ATTORNEYS

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ASHLEY H. MORGAN
GORAN MUSINOVIC
ROBERT P. NOELL
KEVIN N. PERKEY
GRAYSON K. SCHLEPPHORN
O. E. SCHOW, IV
M. AARON SPENCER
ROBERT L. VANCE
LOUIS C. WOOLF (RETIRED)

March 9, 2016

VIA FIRST CLASS MAIL & E-MAIL

Melanie E. Davis, Esq.
Kizer & Black
329 Cates Street
Maryville, TN 37801-4903

Re: Eagles Nest Water Lines

Dear Melanie:

I am sending you this correspondence as counsel for Eagles Nest, LLC ("Eagles Nest"). If you do not represent Eagle's Nest in the below discussed issue, please advise immediately and provide the proper contact information. Our client, Moy Toy, LLC ("Moy Toy"), has been informed that Eagles Nest intends to dig on Moy Toy's property to install water lines. Specifically, I've been told that Eagles Nest intends to dig across Renegade Mountain Parkway and parallel to Renegade Mountain Parkway. Although Moy Toy acknowledges the Order entered on July 24, 2006 granting Eagle's Nest ingress and egress of utilities over, under, and through Renegade Mountain Parkway, Moy Toy is concerned that Eagle's Nest's plan exceeds the scope of the easement.

Further, before Eagle's Nest commences to dig on any of Moy Toy's property, Eagles Nest needs to provide Moy Toy with detailed plans and assurances of indemnification, insurance, properly qualified labor, adequate materials, and assurances that roadways will not be blocked and will remain accessible at all times.

If you have any questions or concerns, please feel free to contact me directly.

Sincerely yours,

Gregory C. Logue

LDH:dj
023387.0002
Enclosure

Melanie E. Davis, Esq.
March 9, 2016
Page 2

cc: Lindy D. Harris, Esq.
Gerald Williams
Robert E. Moore, Jr.

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

FILED
Date 10-26 2015 at 10:25 AM PM
Entered: 10-26-15
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN

ORDER APPOINTING RECEIVER

1. Pursuant to the motion filed on October 26, 2015, by the Petitioner, Tennessee Regulatory Authority ("Authority"), pursuant to T.C.A. § 65-3-105¹ and T.C.A. § 29-1-101, and upon good cause shown, the Court appoints Receivership Management, Inc. of Brentwood, Tennessee as Receiver for the water system controlled by Respondent, Laurel Hills Condominium Property Owners Association ("Laurel Hills").

2. The appointment of Receivership Management, Inc. as Receiver of Laurel Hills' water system is based upon, arises out of and/or is derived from the activities described in the Petition for Appointment of Receiver. Through this appointment, the Court deems the Receiver as a party to these proceedings.

3. Receivership Management, Inc., as Receiver, is directed forthwith to take exclusive custody, control and possession of all bank accounts, goods, chattels, causes of action,

¹ The provisions of T.C.A. § 65-3-105 are made applicable to public utilities regulated by the Petitioner pursuant to T.C.A. § 65-4-105.

STATE OF TENNESSEE, COUNTY OF CUMBERLAND
I, THE UNDERSIGNED, CLERK & MASTER OF SAID
COUNTY AND STATE, DO HEREBY CERTIFY THAT
THIS IS A TRUE AND CORRECT COPY OF THE
ORIGINAL OF THIS INSTRUMENT.

THIS 26 DAY OF October, 2015

Sue Tollett

CLERK & MASTER

credits, monies, investments, stocks, shares, effects, books and records of account and other papers and property or interests owned or held by the Respondent relating in whole or in part to the water system, with full power to sue for, collect, receive and take possession of such properties and to conserve and administer them under the general supervision of the Court.

4. Receivership Management, Inc., as Receiver of Laurel Hills' water system, shall forthwith contact all financial, agency, trust or depository institutions ("financial institutions") maintaining accounts on behalf of Respondent, Laurel Hills relating in whole or in part to the water system and employ whatever lawful means necessary to secure the funds in these, and any other accounts, for the Receivership, and to amend the signature cards so that only those persons approved by the Receiver shall be permitted to withdraw upon such accounts.

5. Receivership Management, Inc., as Receiver of Laurel Hills' water system, shall secure from any financial institution, wherever located, where Laurel Hills maintains property or accounts, the funds within financial institution accounts and all financial information concerning all such accounts. Said financial institution shall provide those funds and the information to the Receiver.

6. All persons, firms, corporations and associations, including but not limited to Respondent, Laurel Hills, and its officers, directors, stockholders, members, subscribers, agents and all other persons in active concert or participation with it, are prohibited and enjoined from the transaction of further business of the Respondent's water system; from the waste, transfer or disposition of property of the Respondent's water system; from doing any act or thing whatsoever to interfere with the taking control, possession and administration by the Receiver of the receivership properties or to in any way interfere with the Receiver, or to harass or interfere with the Receiver, or to interfere in any manner with the exclusive jurisdiction of this Court over

the receivership properties; from the institution or further prosecution of any actions or proceedings, except within this receivership itself; from the making of any sale or deed for nonpayment of taxes or assessments that would lessen the value of the assets of the Respondent; from the withholding from the Receiver of books, accounts, documents or the records relating to the business of the Respondent; from any other threatened or contemplated action that might lessen the value of the Respondent's assets or prejudice the rights of investors, creditors or any proceeding under the Receivership; or the obtaining of preferences, judgments, attachments or other liens, or the making of any levy against the Respondent or against its assets or any party thereof or from enforcing any lien upon, or taking or attempting to take possession of, or retaining possession of, any receivership property or attempting to foreclose, forfeit, alter or terminate any interests of the Respondent, in any property, whether such acts are part of a judicial proceeding or otherwise, until further order of this Court; from accelerating the due date of any obligation or claimed obligation; and that this Court further authorizes the Receiver to apply outside of Tennessee for the relief above described:

7. Pursuant to Tenn. Code Ann. § 65-3-105 and Tenn. Code Ann. §§ 29-1-101 *et seq.*, the officers, managers, directors, trustees, owners, employees or agents of Respondent, Laurel Hills, and any other persons with authority over or in charge of any segment of the Respondent's affairs and persons in control of assets, books and records of the receivership entities, or their physical locations, including but not limited to any offices of the Respondent, are required to cooperate with the Receiver in the carrying out of the Receivership. The term "person" shall include any person who exercises control directly or indirectly over activities of the Respondent through any holding company or other affiliate of the Respondent. "To cooperate" shall include, but shall not be limited to, the following: (1) to reply promptly in

writing to any inquiry from the Receiver requesting such a reply; (2) to make available to the Receiver any books, bank and investment accounts, documents or other records or information or property of or pertaining to the Respondent and/or in possession, custody or control of the Respondent, which relate to, arise out of or are derived from the activities described in the Petition for Appointment of Receiver, Restraining Order, and Temporary and Permanent Injunction Complaint. No person shall obstruct or interfere with the Receiver in the conduct of this Receivership.

8. All customers of and vendors/suppliers to Laurel Hills are hereby ordered to cooperate with reasonable requests of the Receiver regarding information and documentation concerning services received from Laurel Hills or services or goods provided to Laurel Hills.

9. No person shall obstruct or interfere with the Receiver in the conduct of this Receivership, and efforts to obstruct will be dealt with by the Court upon the Receiver's filing for contempt.

10. Receivership Management, Inc., as Receiver, is authorized to employ such counsel, professional advisors, clerks or assistants as deemed necessary. The persons employed under this section shall serve at the direction of the Receiver. The compensation of the Receiver, counsel, clerks and assistants and all expenses of taking possession of Laurel Hills' water system and conducting the proceeding (hereinafter "Receivership fees and costs") shall be submitted monthly, shall be approved by the Court and shall be paid out of the funds or assets of Laurel Hills' water system, if such funds are available. If, through the progression of the Receivership, funds or assets of Laurel Hills' water system are not available to pay Receivership fees and costs, then those fees and costs will be taxed as court costs to be paid by the Authority to the Receiver. In such instance(s), the Receiver will present the Receivership fees and costs to the Court for

approval as a request for interim taxing of costs while simultaneously invoicing the Receivership fees and costs to the Authority, who will pay the Receivership fees and costs upon approval of the Court. The Authority reserves the ability to recoup amounts so paid if later there are assets or funds available for such recoupment. The Receivership fees and expenses will generally consist of services rendered by the Receiver's president, Jeanne B. Bryant, billed at \$ 163/hour, expenses and costs of other staff employed by the Receiver, normal overhead costs of the Receiver and professional fees and expenses incurred by the Receiver, the hourly billing rate of its principal counsel. The Receiver will present motions monthly to the Court for approval of the Receivership fees and costs. If the motions are unopposed after being on file for ten (10) calendar days, then the Court shall order their approval, absent question raised by the Court upon its review. If a motion for approval of Receivership fees and costs is opposed, it will be set for hearing at the next available time on the Court's docket in Cumberland County, Tennessee or elsewhere if circumstances so dictate.

11. If the taxation to, and payment of, Receivership fees and costs by the Authority becomes onerous to the Authority, it may move the Court to relieve it of the obligation of such taxation and payment. The Receiver reserves the ability to move the Court to be relieved of its position if payment of Receivership fees and costs is jeopardized or not otherwise provided for.

12. The Receiver is ordered to make an accounting to the Court no less frequently than semi-annually. The report shall include the Receiver's opinion as to the likelihood that additional action under T.C.A. § 65-3-105 and/or §§ 29-1-101, *et seq.* will be necessary.

13. The Receiver may take such action as it deems necessary or appropriate to reform, revitalize and/or rehabilitate Laurel Hills' water system. It shall have all the powers of the directors, officers and managers, whose authority shall be suspended, except as such is

re-delegated by the Receiver. It shall have full power to direct and manage, to hire and discharge employees, subject to any contract rights they may have, and to deal with the property and business of Laurel Hills' water system. The Receiver is empowered to petition the appropriate regulatory authority or tribunal to address changes in the rates charged for Laurel Hills' water system's services. The Receiver may consult and cooperate with other state and federal authorities who may have jurisdiction over any parts of the property and business of Laurel Hills' water system, including, but not limited to, any ancillary liquidator who may be appointed. In addition, the Receiver shall have any other powers given by state law.

14. If it appears to the Receiver that there has been criminal or tortuous conduct, or breach of any contractual or fiduciary obligation detrimental to Laurel Hills, by any officer, manager, agent, broker, employee or other person, it may pursue all appropriate legal remedies on behalf of Laurel Hills's water system, including, but not limited to, the making of criminal referrals to the appropriate state and/or federal authorities/law enforcement agencies and the institution of civil actions on behalf of Laurel Hills' water system or on behalf of Laurel Hill's water system's creditors and claimants.

15. If the Receiver determines that reorganization, consolidation, conversion, merger, dissolution, liquidation or other transformation of Laurel Hills' water system is appropriate, it shall prepare a plan to effect such changes, including, if necessary, the liquidation and sale of all of Laurel Hill's water system assets. Upon application of the Receiver for approval of the plan, and after such notice and hearing as the Court may prescribe, the Court may either approve or disapprove the plan proposed, or may modify it and approve it as modified. Any plan approved under this section shall be, in the judgment of the Court, fair and equitable to all parties concerned. If the plan is approved, the Receiver shall carry out the plan.

16. The Receiver shall have the power to avoid fraudulent transfers. Every transfer made or suffered and every obligation incurred by Laurel Hills within one (1) year prior to the filing of a successful Petition for Receivership is fraudulent as to then existing and future creditors; if made or incurred without fair consideration, or with actual intent to hinder, delay or defraud either existing or future creditors. Transfers which are considered fraudulent may be voided by the Receiver, except as to a person who, in good faith, is a purchaser, lienholder or obligee, who, in good faith, has given a consideration less than fair for such transfer, lien or obligation, may retain the property, lien or obligation as security for repayment. The Court may, on due notice, order any such transfer or obligation to be preserved for the benefit of the estate, and, in that event, the Receiver shall succeed to and may enforce the rights of the purchaser, lienholder or obligee.

17. Laurel Hills and/or its counsel will immediately inform the Receiver of all legal proceedings to which Laurel Hills is a party or in which Laurel Hills is involved (e.g., receipt of a subpoena, etc.). Any court in this State before which any action or proceeding in which Laurel Hills is a party, or is obligated to defend a party, shall stay the action or proceeding for one hundred twenty (120) days and such additional time as is necessary for the Receiver to obtain proper representation and prepare for further proceedings. The Receiver shall take such action respecting the pending litigation as it deems necessary in the interest of justice and for the protection of creditors, investors and the public. The Receiver shall immediately consider all litigation pending outside this State and shall petition the Courts having jurisdiction over that litigation for stays whenever necessary to protect the estate of Laurel Hills.

18. No statute of limitations or defense of laches shall run with respect to any action by or against Laurel Hills's between the filing of the Petition for Order directing Receivership

Management, Inc. to serve as Receiver for Laurel Hills's water system and the entry of the Order granting or denying this Petition. Any action against Laurel Hills that might have been commenced when the Petition was filed may be commenced for at least sixty (60) days after this Order Appointing Receiver is entered. Any such action filed against Laurel Hills, as well as actions pending against Laurel Hills, may be subject to dismissal if the Court approves, as part of any plan recommended to it (as referenced in Paragraph 14 above), that all claims as against Laurel Hills' water system be handled through a unified proof of claim process within the Receivership. The Receiver may, upon entry of this Order, within one (1) year, or such other longer time as applicable law may permit, institute an action or proceeding on behalf of Laurel Hills' water system upon any cause of action against which the period of limitation fixed by applicable law has not expired at the time of the filing of the Petition upon which this Order is entered.

19. The Receiver, and its employees, agents, representatives or counsel, shall not be held personally responsible for any claims against Laurel Hills' water system which existed, arose, matured or vested prior to the Receiver's appointment.

20. The Receiver, and its employees, agents, representatives or counsel, shall not be held personally responsible for amounts of funds, goods or services already provided or extended to Laurel Hills' water system, or which will be provided or extended to Laurel Hills' water system in the future.

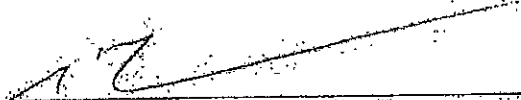
21. Pursuant to T.C.A. § 29-1-104, the Receiver will post a bond of \$ Waived with the Cumberland County Clerk & Master within five (5) business days of the entry of this Order. This Order will be effective, however, during the five (5) day period and will be effective thereafter. The beneficiary of the bond will be the Laurel Hills' water system Receivership

estate and, therefore, the costs of the bond will be paid with funds available to Laurel Hill's Receivership estate or will be taxed as costs and paid by the Authority as outlined in Paragraph 10 above.

It is so ORDERED, this the 26th day of October, 2015.


RONALD THURMAN, CHANCELLOR

Submitted for Entry By:



Shiva K. Bozarth, BPR No:22685
Chief of Compliance
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243.

Counsel for Tennessee Regulatory Authority

CERTIFICATE OF SERVICE

I certify that I have served a copy of the forgoing document on the following persons by depositing a copy of same in the U.S. Mail, postage prepaid, addressed to them at the addresses shown below:


Donald Scholes
Benjamin Gastel
227 Second Avenue North
Fourth Floor
Nashville, Tennessee 37201

Melanie Davis
329 Cates Street
Maryville, Tennessee 37801

Vance Broemel
Consumer Advocate and Protection Division
Tennessee Attorney General and Reporter
P.O. Box 20207
Nashville, Tennessee 37202

Roger York
456 North Main Street, Suite 201
Crossville, Tennessee 38555

This the 31st day of October, 2015.



Shiva K. Bozarth

ASSIGNMENT AND BILL OF SALE

THIS ASSIGNMENT AND BILL OF SALE is executed this 5th day of April, 2016, effective as of October 26, 2015 (the "Effective Date"), by LAUREL HILLS CONDOMINIUM PROPERTY OWNERS ASSOCIATION, a Tennessee non-profit corporation (hereinafter "LAUREL HILLS").

WHEREAS, LAUREL HILLS has been requested to issue this Assignment and Bill of Sale assigning and conveying whatever interest it may have in and to certain of its former water company assets to the LAUREL HILLS WATER SYSTEM IN RECEIVERSHIP (hereinafter "LAUREL HILLS RECEIVERSHIP").

NOW, THEREFORE, for and in consideration of the sum of Ten Dollars (\$10.00) in hand paid, and other good and valuable consideration, the receipt of which is hereby acknowledged, LAUREL HILLS does hereby assign, remise, release and quit claim unto LAUREL HILLS RECEIVERSHIP forever, all of the right, title, interest, claim and demand which LAUREL HILLS has in and to the following personal property relating to the water system formerly operated by LAUREL HILLS on Renegade Mountain, Cumberland County, Tennessee, to-wit:

(SEE ATTACHED SCHEDULE "A")

TO HAVE AND TO HOLD the same together with all and singular, the appurtenances thereto belonging or in anywise appertaining, and all of the estate, right, title, interest, lien, equity and claim whatsoever of the said LAUREL HILLS.

IN WITNESS WHEREOF, this Assignment and Bill of Sale is executed by the undersigned on the day and year first written above.

WITNESSES:

Judith A. Sullivan

Print Name: Judith A. Sullivan BY:

Lois Antonucci

Print Name: Lois Antonucci

LAUREL HILLS CONDOMINIUM
PROPERTY OWNERS ASSOCIATION

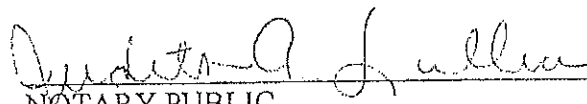
Michael McClung

MICHAEL MCCLUNG, President of
LAUREL HILLS CONDOMINIUM
PROPERTY OWNERS ASSOCIATION,
a Tennessee non-profit association

STATE OF FLORIDA
COUNTY OF ST. LUCIE

I HEREBY CERTIFY that on this day, before me, an officer duly authorized in the State and County foresaid to make acknowledgments, personally appeared MICHAEL MCCLUNG, as President of LAUREL HILLS CONDOMINIUM PROPERTY OWNERS ASSOCIATION, a ~~Tennessee non-profit association,~~ personally known to me or who produced _____ as identification, to be the person described in and who executed the foregoing instrument and he acknowledged before me that he executed the same.

WITNESS my hand and official seal in the County and State last aforesaid this 5th day of April, 2016.


NOTARY PUBLIC
STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES:



SCHEDULE "A"

LIST OF ASSETS TO BE CONVEYED TO THE RECEIVER

1. All water transmission lines;
 2. All water service lines;
 3. All water meters and valves;
 4. The pumping station located on Mullinax Drive, Crab Orchard, Tennessee;
 5. The water storage tank located next to the pumping station;
 6. All other tangible assets used by Laurel Hills in connection with the Renegade Mountain Water System (currently in the possession of Laurel Hills Receivership);
 7. All accounts receivable;
 8. All rights under any contracts related to water service;
 9. All service rights;
 10. All other general intangible rights related to the provision of water service.
-

W M | **WOOLF · McCLANE**

WOOLF, McCLANE, BRIGHT, ALLEN & CARPENTER, PLLC

— A T T O R N E Y S —

900 Riverview Tower | 900 S. Gay Street | Knoxville, TN 37902-1810

Mailing Address: Post Office Box 900 | Knoxville, TN 37901-0900

Phone: (865) 215-1000 | Fax: (865) 215-1001

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O. E. SCHOW, IV
C. GAVIN SHEPHERD
M. AARON SPENCER
ROBERT L. VANCE
LOUIS C. WOOLF (RETIRED)

May 31, 2016

Via Electronic Mail and First Class Mail

G. Everett Sinor, Jr., Esq.
3504 Robin Road
Nashville, Tennessee 37204

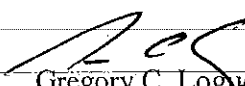
Re: *Laurel Hills Water System in Receivership*

Dear Mr. Sinor:

I am in receipt of your letter of April 12, 2016. I believe the issues raised in your letter should be addressed to my client's Florida counsel, Rob Schwerer, at 130 South Indian River Drive, Suite 304, Fort Pierce, Florida 34590.

Thank you for your cooperation.

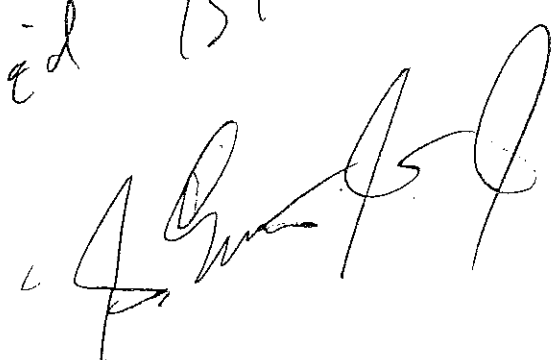
Sincerely yours,


Gregory C. Logue

GCL:ar

cc: Robert Schwerer, Esq.
Mr. Michael McClung
Mr. Phillip Guettler
Mr. Darren Guettler

023387.0002

Rec'd 6/3/16




Everett Sinor <everett.sinor@gmail.com>

Fwd: Laurel Hills Water System

1 message

Schwererlaw <schwererlaw@aol.com>

Tue, May 31, 2016 at 6:18 PM

To: glogue@wmbac.com

Cc: everett.sinor@gmail.com

Greg, it is my understanding that Scott Hall is handling matters for Moy Toy relative to any water system issues. As best I know, Moy Toy is the developer of Renegade Mountain and has title to Renegade Parkway and other roads and private right of ways. If anyone does excavation work or buries lines and utilities within such areas (emergency repairs and routine maintenance generally excluded) they require that plans and specifications be provided for record keeping purposes and to document the work is code compliant. I am unaware this has ever been interpreted or applied as an adversarial process, but rather, much the same as a local government or agency requirement whenever utility providers are working in municipal or county roads or right of way. Traffic control and licensed and insured contractors are also required. Beyond that, I am sure Scott can clarify any remaining questions.

Robert. V. Schwerer, Esq.
Managing Shareholder
Hayskar, Walker, Schwerer, Dundas
& McCain P.A.
Renaissance Financial Center
130 South Indian River Drive
Suite 304
Fort Pierce, FL 34950

Phone: (772) 461-2310
Fax: (772) 468-6580
Email: schwererlaw@aol.com

Fort Pierce City Attorney Office: (772) 467-3038

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

---Original Message---


From: Angie Rossini <arossini@wmbac.com>
To: everett.sinor <everett.sinor@gmail.com>
Cc: Gregory C. Logue <glogue@wmbac.com>; schwererlaw <schwererlaw@aol.com>
Sent: Tue, May 31, 2016 4:31 pm
Subject: Laurel Hills Water System

Attached is correspondence from Greg Logue regarding the above matter.

Angie Rossini
Legal Secretary to Daniel J. Moore and Gregory C. Logue
Woolf, McClane, Bright, Allen, & Carpenter, PLLC, Attorneys Post Office Box 900
Knoxville, Tennessee 37901-0900
Phone: (865) 215-1000 | Fax: (865) 215-1001
arossini@wmbac.com

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184K

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

Jeanne Barnes Bryant

May 2016 Fees \$537.90

Receivership Management, Inc.

May 2016 Fees \$7,297.45

May 2016 Overhead Expense \$899.50

May 2016 Expenses \$573.20

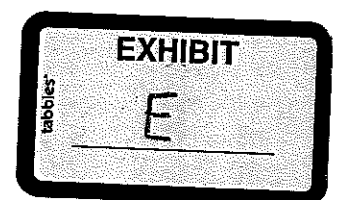
Everett Sinor

May 2016 Fees & Expenses \$8,949.74

Jacqueline Lawson

May 2016 Fees & Expense \$486.59

\$18,744.38



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

Invoice for Professional Services

| LAUREL HILLS WATER DISTRICT | | May 2016 |
|-----------------------------|----------------------|--|
| 5/3/2016 | Jeanne Barnes Bryant | EMAILS RE REPORT, EMAIL RE INSURANCE ISSUE FROM COUNSEL 0.3 \$163.00 \$48.90 |
| 5/5/2016 | Jeanne Barnes Bryant | EMAIL FROM COUNSEL RE INSURANCE, UPDATE FROM ROB MOORE 0.2 \$163.00 \$32.60 |
| 5/6/2016 | Jeanne Barnes Bryant | EMAILS RE INSURANCE 0.1 \$163.00 \$16.30 |
| 5/9/2016 | Jeanne Barnes Bryant | UPDATE FROM ROB MOORE RE HEARING, EMAILS RE INSURANCE 0.5 \$163.00 \$81.50 |
| 5/10/2016 | Jeanne Barnes Bryant | EMAILS RE INSURANCE QUOTE, QUESTION RE PAYMENT, DISCUSSION WITH ROB MOORE RE INCREASED RATE AND QUESTIONS RE SAME, QUESTION TO ACCOUNTING RE CURRENT OUTSTANDING INVOICES 0.5 \$163.00 \$81.50 |
| 5/12/2016 | Jeanne Barnes Bryant | EMAILS RE INSURANCE ISSUES, EMAIL RE MARCH AND APRIL REPORT 0.2 \$163.00 \$32.60 |
| 5/13/2016 | Jeanne Barnes Bryant | EMAIL FROM COUNSEL RE CHANGES TO REPORT, REVIEW ALL CHANGES, QUESTION TO ROB MOORE RE SAME 0.2 \$163.00 \$32.60 |
| 5/19/2016 | Jeanne Barnes Bryant | EMAILS RE MOTION FILING AND RATE ORDER FROM TRA 0.1 \$163.00 \$16.30 |
| 5/23/2016 | Jeanne Barnes Bryant | EMAIL FROM COUNSEL RE RATE ORDER, QUESTIONS RE SAME 0.2 \$163.00 \$32.60 |
| 5/24/2016 | Jeanne Barnes Bryant | EMAILS FROM SINOR RE MOTION ON RATE, REVIEW MOTION 0.3 \$163.00 \$48.90 |
| 5/25/2016 | Jeanne Barnes Bryant | EMAILS FROM SINOR RE ADDITIONAL ISSUES RE RATE FILING, EMAIL RE ACCOUNTING FILING 0.1 \$163.00 \$16.30 |
| 5/27/2016 | Jeanne Barnes Bryant | UPDATE RE MEETING 0.3 \$163.00 \$48.90 |
| 5/31/2016 | Jeanne Barnes Bryant | DISCUSSION WITH ROB MOORE RE COMMUNITY MEETING, QUESTION RE HEARING AND REPORT FOR COURT 0.3 \$163.00 \$48.90 |

LAUREL HILLS WATER DISTRICT

May 2016

Total

\$537.90

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

Invoice for Professional Services

| LAUREL HILLS WATER DISTRICT | | May 2016 | |
|-----------------------------|----------------------|---|-------------------------|
| 5/2/2016 | Jere P. Cowan | EMAIL DEPOSIT INFORMATION FROM T. STEPHENS OFFICE; UPDATE FINANCIAL RECORDS RE: SAME | 0.2 \$50.00 \$10.00 |
| 5/2/2016 | Robert E. Moore, Jr. | MEETING WITH E. SINOR RE: PREPARATION WORK FOR TRA HEARING, DISCUSSION OF MEETING WITH EAGLES NEST .75 | 0.75 \$153.00 \$114.75 |
| 5/3/2016 | Jere P. Cowan | EMAIL TO E. SINOR RE: R. MOORE AFFIDAVIT FILING | 0.1 \$50.00 \$5.00 |
| 5/3/2016 | Robert E. Moore, Jr. | EMAIL FROM E. SINOR RE: AFFIDAVIT AND FOLLOW UP DISCOVERY RESPONSES, EXECUTE AFFIDAVIT AND RESPOND .2; | 0.2 \$153.00 \$30.60 |
| 5/4/2016 | Jere P. Cowan | FINALIZE R. MOORE AFFIDAVIT AND FORWARD TO S. DILLON FOR FILING AND TO COUNSEL; TELEPHONE CONVERSATION WITH E. SINOR RE: FILING AFFIDAVIT WITH TRA; FINALIZE AND FORWARD AFFIDAVIT TO TRA AND TO COUNSEL COPIES; | 1.2 \$50.00 \$60.00 |
| 5/4/2016 | Robert E. Moore, Jr. | REVIEW EMAILS FROM E. SINOR RE: DISCOVERY RESPONSES, DISCUSSION WITH C. SMITH AND J. COWAN, FORWARD APRIL TIME SHEET TO J. COWAN FOR PRINTING; CALL TO E. SINOR TO CONFIRM TRAVEL PLANS .2; DISCUSSION WITH J. COWAN AND C. SMITH RE: INFORMATION REQUEST ON DISCOVERY, UPDATE FROM J. COWAN, SCAN AND EMAIL TO E. SINOR .2 | 0.4 \$153.00 \$61.20 |
| 5/5/2016 | Jere P. Cowan | EMAILS AND TELEPHONE CONVERSATIONS WITH TRA RE: AFFIDAVIT FILING; | 0.2 \$50.00 \$10.00 |
| 5/5/2016 | Robert E. Moore, Jr. | TRAVEL TO CROSSVILLE, MEETING WITH JOHN MOORE AND WENDALL HARKELROAD, MEETING WITH GERALD WILLIAMS, RETURN TRAVEL TO NASHVILLE 8.8 | 8.8 \$153.00 \$1,346.40 |

LAUREL HILLS WATER DISTRICT

May 2016

| Date | Name | Description | Hours | Rate | Total |
|-----------|----------------------|--|-------|----------|----------|
| 5/6/2016 | Cody C. Smith | DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. CONFERENCE CALL WITH HEATHER AND TERRY STEPHENS. UPDATE LHWD ACCOUNT AND REQUEST ACCUREL BALANCE SHEET FROM THEIR RECORDS. MEET WITH R. MOORE TO DISCUSS ENTITY'S CURRENT POSITION. | 2.4 | \$123.00 | \$295.20 |
| 5/6/2016 | Jere P. Cowan | DEPOSIT UPDATE FROM T. STEPHENS OFFICE; UPDATE FINANCIAL RECORDS RE: SAME | 0.5 | \$50.00 | \$25.00 |
| 5/9/2016 | Robert E. Moore, Jr. | EMAIL TO C.SMITH RE: 6 MONTH ACCOUNTING, MEETING WITH C.SMITH RE: SAME, UPDATE FROM C.SMITH RE: INFORMATION FOR HEARING, INFORMATION FOR REPORT 1.25; MEETING WITH E.SINOR RE: HEARING PREPARATION .5; REVIEW EMAILS FROM E.SINOR RE: INSURANCE COVERAGE QUOTE, DISCUSSION OF SAME WITH J.BRYANT .2; MEETING WITH E.SINOR RE: PREPARE AND REVIEW TESTIMONY AND HEARING PRESENTATION 1.75 | 3.7 | \$153.00 | \$566.10 |
| 5/9/2016 | Cody C. Smith | PREPARE BACK UP DOCUMENTATION FOR R.MOORE TO REPRESENT CURRENT EXPENSES AND LIABILITIES OWED BY LHWD. CALL TERRY STEPHENS FOR MONTHLY CHARGES. | 1.8 | \$123.00 | \$221.40 |
| 5/9/2016 | Robert E. Moore, Jr. | PRE HEARING MEETING WITH E.SINOR. TRAVEL TO HEARING, ATTEND HEARING, MEETING WITH E.SINOR TO PLAN SEQUENCE OF EVENTS AND ASSIGNMENTS 6.2 | 6.2 | \$153.00 | \$948.60 |
| 5/10/2016 | Cody C. Smith | UPDATE REGISTER AND RECONCILE BANK ACCOUNT. DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. ACCOUNT FOR 25% PAYMENT FOR INSURANCE POLICY AND OTHER MAY EXPENSES. | 0.6 | \$123.00 | \$73.80 |
| 5/10/2016 | Robert E. Moore, Jr. | CALL FROM M.KENDALL AT AQUAGREEN, DISCUSSION OF SYSTEM, PROBLEMS, INTERESTED IN POSSIBLE MANAGEMENT .75; CALLS TO BROWN INSURANCE RE: FORMER INSURANCE RATE, DISCUSSION OF PROPOSED RATE FROM C N A INSURANCE WITH J.BRYANT AND E.SINOR, ACCEPT PROPOSAL AND BINDER OF COVERAGE. INSTRUCT C.SMITH RE: PAYMENT 1.0; REVIEW DRAFT REPORT WITH REVISIONS AND APPROVAL .2 | 1.95 | \$153.00 | \$298.35 |

LAUREL HILLS WATER DISTRICT

May 2016

| Date | Name | Description | Hours | Rate | Total |
|-----------|----------------------|--|-------|----------|----------|
| 5/11/2016 | Cody C. Smith | REVIEW A/R STATEMENT, P&L, AND GENERAL LEDGER PROVIDED BY TERRY STEPHENS OFFICE. CONFERENCE CALL WITH EVERETTE AND R. MOORE TO DISCUSS COMPANY LIABILITIES AND CURRENT STATUS. CONFERENCE CALL WITH HEATHER ON ACCRUAL REPORTS FOR LHWD PLUS ASSETS IN POSSESSION SA OF APRIL 2016. | 3.7 | \$123.00 | \$455.10 |
| 5/11/2016 | Cody C. Smith | PHONE CALL WITH DART FROM GREEN UTILITIES FOR TANK REPAIR QUOTE. | 0.5 | \$123.00 | \$61.50 |
| 5/11/2016 | Robert E. Moore, Jr. | CALL WITH C.SMITH AND E.SINOR RE: ACCOUNTING OF SYSTEM, DISCUSSION OF REPORTING, ELEMENTS OF VALUE FOR SYSTEM, CALL WITH HEATHER AT T STEVENS OFFICE RE: PREPARATION OF ACCRUAL RECORDS 1.5 | 1.5 | \$153.00 | \$229.50 |
| 5/12/2016 | Cody C. Smith | CONFERENCE CALL WITH EVERETTE, R. MOORE, AND J. BRYANT OVER CURRENT STANDING OF CASH RECEIPTS AND DISBURSMENTS. (WATER OPERATIONS ONLY) CREATE CASH RECEIPTS FROM JUST WATER OPERATIONS. LOG UNPAID INVOICES AND EXPENSES. MULTIPLE EMAILS WITH EVERETTE AND ROB MOORE OVER ACCOUNT BASED ON ACCRUEL OR CASH BASIS. | 2.6 | \$123.00 | \$319.80 |
| 5/12/2016 | Jere P. Cowan | RECEIPT AFFIDAVIT OF PUBLICATION FROM CROSSVILLE CHRONICLE; REVISIONS TO STATUS REPORT; EMAIL TO J. BRYANT, R. MOORE, E. SINOR | 0.4 | \$50.00 | \$20.00 |
| 5/12/2016 | Jere P. Cowan | ASSISTANCE WITH PREPARING COURT STATUS REPORT; DRAFTING EXHIBITS; EMAILS WITH AND CONFERENCES WITH C. SMITH AND E. SINOR RE: FINANCIAL EXHIBITS; | 1 | \$50.00 | \$50.00 |
| 5/12/2016 | Robert E. Moore, Jr. | CALL FROM E.SINOR RE: DATES FOR RATE HEARING AND PLAN OF RECEIVERSHIP FILING .10; CALL WITH E.SINOR AND C.SMITH RE: INSURANCE AND SYSTEM CASH FLOW AND OTHER WORKING ISSUES .75 | 0.85 | \$153.00 | \$130.05 |
| 5/13/2016 | Cody C. Smith | CONFERENCE CALL WITH EVERETTE AND ROB MOORE OVER FINANCIALS AND PAST 6 MONTHS CASH RECEIPTS AND DISBURSMENTS FOR A BETTER PROJECTION OF MONTHLY STANDINGS. | 0.8 | \$123.00 | \$98.40 |
| 5/13/2016 | Jere P. Cowan | EMAILS WITH E. SINOR RE: REVISIONS TO STATUS REPORTING AND NEEDED FINANCIAL EXHIBITS; REVISIONS TO SAME; EMAIL DEPOSIT INFO FROM T. STEPHENS; UPDATE FINANCIAL ACCOUNT | 0.5 | \$50.00 | \$25.00 |

LAUREL HILLS WATER DISTRICT

May 2016

| Date | Name | Description | Hours | Rate | Total |
|-----------|----------------------|---|-------|----------|----------|
| 5/13/2016 | Robert E. Moore, Jr. | REVIEW DRAFT ACTIVITY REPORT WITH J.BRYANT .2; REVIEW AND RESPOND TO EMAIL FROM E.SINOR RE: INTERESTED WATER MANAGEMENT COMPANIES .10 | 0.3 | \$153.00 | \$45.90 |
| 5/16/2016 | Robert E. Moore, Jr. | REVIEW AND RESPOND TO EMAILS FROM E.SINOR RE: DRAFT LETTER FROM AG CONSUMER ADVOCATE .10 | 0.1 | \$153.00 | \$15.30 |
| 5/17/2016 | Cody C. Smith | DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. ACCRUE FOR INSURANCE PAYMENTS OF, 25% OF 15,000. | 0.4 | \$123.00 | \$49.20 |
| 5/17/2016 | Robert E. Moore, Jr. | DISCUSSION WITH C.SMITH RE: MICROBAN INVOICE, INSURANCE INVOICE, CALL TO E.SINOR RE: UPDATE ON FILING .2; CALL FROM K.KRUCHINSKI AT AMERICAN WATER RE: INTEREST IN THE SYSTEM OWNERSHIP .3; EMAIL TO E.SINOR, AND CALL FROM E.SINOR RE: SAME .1; CALL FROM M.MCLUNG RE: MEETING LOCATION CONCERN'S ABOUT BEING HELD IN A PRIVATE HOME. ADVISE E.SINOR, REVIEW OPTIONS FOR MEETING LOCATION .3; CALL WITH J.MOORE RE: MEETING LOCATION .10 | 1 | \$153.00 | \$153.00 |
| 5/18/2016 | Cody C. Smith | UPDATE LHWD QUICK ACCOUNT AND RECONCILE TO WATER SERVICE ONLY TRIAL BALANCE, PER CASH BASIS. POST FEE AND CURRENT EXPENSES. | 1.8 | \$123.00 | \$221.40 |
| 5/18/2016 | Robert E. Moore, Jr. | EMAIL FROM M.MCLUNG RE: MEETING .10; CALL WITH JERE AT CITY OF CRAB ORCHARD TENNESSEE RE: RENTAL OF SPACE FOR COMMUNITY MEETING .25; UPDATE E.SINOR RE: SAME .2 | 0.55 | \$153.00 | \$84.15 |
| 5/19/2016 | Cody C. Smith | CONVERT QUICKBOOKS REPORTS IN TO QUICK FILE. UPDATE REGISTER INCEPTION THROUGH 4/30/16. CREATE NET ASSETS BASED ON WATER OPERATIONS ONLY, INCEPTION THROUGH 4/30/16. TOTAL ACCOUNT PAYABLES THAT WILL BE ADDED TO NET ASSETS. DISCUSSION ON COMPANY STATUS UPDATE WITH RMOORE. | 2.6 | \$123.00 | \$319.80 |
| 5/19/2016 | Jere P. Cowan | TELEPHONE CALL WITH E. SINOR RE: R. MOORE AFFIDAVIT AND RE: S. BOZARTH AFFIDAVIT READY FOR PICKUP; TRAVEL TO TRA OFFICE FOR BOZARTH AFFIDAVIT | 1.4 | \$50.00 | \$70.00 |
| 5/19/2016 | Robert E. Moore, Jr. | UPDATE ON RATE MATTERS FROM E.SINOR, FINALIZE ACTIVITY REPORT, DISCUSSION WITH C.SMITH RE: ACCOUNTING FORMAT AND REPORTING PERIODS .3 | 0.3 | \$153.00 | \$45.90 |

LAUREL HILLS WATER DISTRICT

May 2016

| Date | Name | Description | Hours | Amount |
|-----------|----------------------|---|-------|------------|
| 5/20/2016 | Robert E. Moore, Jr. | DISCUSSIONS WITH C.SMITH RE: ACCOUNTING .10; REVIEW AND RESPOND TO EMAIL FROM E.SINOR RE: COMMUNITY MEETING, LOSS LETTER DRAFT, CALL FROM E.SINOR RE: SAME .10 | 0.2 | \$153.00 |
| 5/23/2016 | Robert E. Moore, Jr. | REVIEW ORDER FROM TRA, EMAILS FROM E.SINOR RE: INSURANCE .2 | 0.2 | \$153.00 |
| 5/24/2016 | Robert E. Moore, Jr. | REVIEW EMAILS FROM E.SINOR RE: RECENT ORDER FROM ADMINISTRATIVE JUDGE, UPDATE ON SENDING INFORMATION TO THREE WATER SYSTEM OPERATORS WHO MAY BE INTERESTED IN LHWS, DISCUSSION OF UPCOMING COMMUNITY MEETING, DISCUSSION OF INSURANCE RATE .25; REVIEW EMAIL FROM E.SINOR RE: CONTACT INFORMATION FOR AQUA GREEN, RESPOND TO SAME .2; CALL WITH D.KENDALL RE: WATER SYSTEM AND ELEMENTS OF CONCERN .4; EMAIL UPDATE TO E.SINOR RE: SAME .10 | 0.95 | \$153.00 |
| 5/25/2016 | Robert E. Moore, Jr. | CALL WITH J.LAWSON RE: COMMUNITY MEETING SCHEDULED FOR FRIDAY .10; MEETING WITH E.SINOR RE: COMMUNITY MEETING; TRA SHOW CAUSE PROCEEDING; RECEIVERSHIP PLAN, FINALIZE REPORT FILING ON RATES .5 | 0.6 | \$153.00 |
| 5/26/2016 | Robert E. Moore, Jr. | COMPLETE REVISED AFFIDAVIT .10; REVIEW AND REVISE COMMUNITY MEETING DISCUSSION TOPICS .25 | 0.35 | \$153.00 |
| 5/27/2016 | Robert E. Moore, Jr. | TRAVEL TO CROSSVILLE, 2.1 (FROM HENDERSONVILLE); FILING WITH CLERK AND MASTER CUMBERLAND COUNTY JUSTICE CENTER .4; TRAVEL TO GRAB ORCHARD CITY HALL .3; PRE-MEETING WITH E.SINOR AND J.LAWSON RE: OUTLINE OF PROCEEDINGS .5; COMMUNITY MEETING 2.75; RETURN TRAVEL TO NASHVILLE 2.5 (OFFICE) | 8.55 | \$1,308.15 |
| 5/31/2016 | Cody C. Smith | POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 05-31-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 05-31-16. | 0.5 | \$123.00 |
| 5/31/2016 | Jere P. Cowan | TELEPHONE CALL FROM CUMBERLAND POINT CONDO ASSOC TREASURER; EMAIL R. MOORE | 0.1 | \$50.00 |
| 5/31/2016 | Jere P. Cowan | RECEIPT SUPPLEMENTAL FILING FROM TRA; FORWARD TO E. SINOR AND R. MOORE | 0.2 | \$50.00 |

LAUREL HILLS WATER DISTRICT

May 2016

Total

\$8,196.95

RMI TRAVEL REIMBURSEMENT REQUEST: JACQUELINE LAWSON

TRAVEL TO: CRAB ORCHARD, TN

COMPANY TO CHARGE: IHWI

DATES IN TRAVEL STATUS: 5/27/16-5/28/16

PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS)

\$ -

MILEAGE REIMB

| | MILES | RATE | AMOUNT |
|-----------|--------|------|-----------------|
| 5/27/2016 | 60.3 | 0.47 | \$ 28.34 |
| 5/28/2016 | 125.00 | 0.47 | \$ 58.75 |
| | | | \$ - |
| | | | <u>\$ 87.09</u> |

OTHER EXPENSES:

-

SUMMARY

| | |
|-----------------|--|
| \$ - | PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS) |
| \$ 87.09 | MILEAGE REIMB |
| \$ - | OTHER EXPENSES: |
| \$ 87.09 | TOTAL EXPENSE |
| \$ - | LESS ADVANCE |
| <u>\$ 87.09</u> | <u>REIMBURSEMENT</u> |

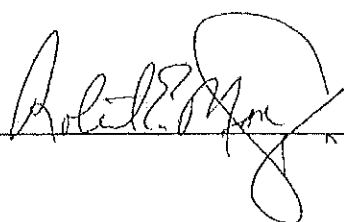
Jacqueline Lawson
 2900 Clinech Valley Rd
 Thorn Hill, TN 37881
 423-585-7738 or 423-973-4737
 jacqueline.lawson@exede.net

LAWU Mileage

| Date | From | To | Mileage | Cost | Total |
|----------|--------------|--------------|---------|--------|---------|
| 05/27/16 | CFOA | CRAB ORCHARD | 60.30 | \$0.47 | \$28.34 |
| | CRAB ORCHARD | HOME OFFICE | 125.00 | \$0.47 | \$59.75 |

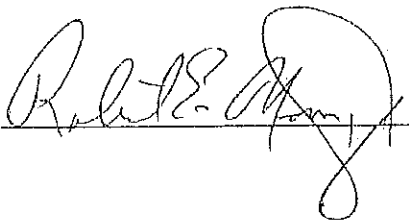
\$87.09

| | A | B | C | D | E | F |
|----|--|---------------|--|---------------|---------------------------------|---|
| 1 | RMI TRAVEL REIMBURSEMENT REQUEST | | | | | |
| 2 | | | | | | |
| 3 | TRAVEL TO: | | Crossville Tennessee | | | |
| 4 | | | | | | |
| 5 | COMPANY TO CHARGE: | | LWHD | | | |
| 6 | | | | | | |
| 7 | DATES IN TRAVEL STATUS | | 5/27/2016 | | | |
| 8 | | | | | | |
| 9 | PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS) | | | | | |
| 10 | | | | | | |
| 11 | ENTER DATE IN COLUMN A AND AMOUNT IN COLUMN D | | | | | |
| 12 | | | | | | |
| 13 | 5/27/2016 | | | | 29.25 | |
| 14 | | | | | | |
| 15 | | | | | | |
| 16 | | | | | | |
| 17 | | | | | | |
| 18 | | | | | | |
| 19 | | | | | | |
| 20 | | | | <u>29.25</u> | | |
| 21 | | | | | | |
| 22 | MILEAGE REIMB @ 47 CENTS PER MILE | | | | | |
| 23 | | | | | | |
| 24 | ENTER DATE IN COLUMN A AND MILES IN COLUMN B | | | | | |
| 25 | | | | | | |
| 26 | | | MILES RATE | AMOUNT | | |
| 27 | | | | | | |
| 28 | 5/27/2016 | 117 | 0.470 | 54.99 | From Hendersonville | |
| 29 | 5/27/2016 | 11 | 0.470 | 5.03 | From Crossville to Crab Orchard | |
| 30 | 5/27/2016 | 117 | 0.470 | 55.08 | From Crab Orchard to Office | |
| 31 | | | | | | |
| 32 | | | | | | |
| 33 | | | | | | |
| 34 | | | | <u>115.10</u> | | |
| 35 | | | | | | |
| 36 | | | | | | |
| 37 | LODGING TOTAL | | | | | |
| 38 | ENTER TOTAL LODGING FOR TRIP. DO NOT | | | | | |
| 39 | BREAK DOWN TOTAL BY DAY. ATTACH INVOICE. | | | | | |
| 40 | | | | | | |
| 41 | | | | | | |
| 42 | OTHER EXPENSES: | | | | | |
| 43 | ENTER BRIEF DESCRIPTION IN COLUMN A AND AMT IN COLUMN D | | | | | |
| 44 | | | | | | |
| 45 | | | | | | |
| 46 | | | | | | |
| 47 | | | | | | |
| 48 | | | | | | |
| 49 | | | | | | |
| 50 | | | | | | |
| 51 | | | | | | |
| 52 | SUMMARY | | | | | |
| 53 | \$ | 29.25 | PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS) | | | |
| 54 | | 115.10 | MILEAGE REIMB @ 47 CENTS PER MILE | | | |
| 55 | | - | LODGING TOTAL | | | |
| 56 | | - | OTHER EXPENSES: | | | |
| 57 | \$ | <u>144.35</u> | REIMBURSEMENT REQUESTED | | | |
| 58 | | | | | | |
| 59 | 5/29/2016 20:41 | | | | | |



2016
6-1-16

| | A | B | C | D | E | F | |
|----|--|-----------------------------|--|--------|---------------------------|---|--|
| 1 | RMI TRAVEL REIMBURSEMENT REQUEST | | | | | | |
| 2 | | | | | | | |
| 3 | TRAVEL TO: | <u>Crossville Tennessee</u> | | | | | |
| 4 | | | | | | | |
| 5 | COMPANY TO CHARGE: | <u>LWHD</u> | | | | | |
| 6 | | | | | | | |
| 7 | DATES IN TRAVEL STATUS | <u>6-8-2016 to 6-9-2016</u> | | | | | |
| 8 | | | | | | | |
| 9 | PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS) | | | | | | |
| 10 | | | | | | | |
| 11 | ENTER DATE IN COLUMN A AND AMOUNT IN COLUMN D | | | | | | |
| 12 | | | | | | | |
| 13 | 6/8/2016 | | | | 29.25 | | |
| 14 | 6/9/2016 | | | | 29.25 | | |
| 15 | | | | | | | |
| 16 | | | | | | | |
| 17 | | | | | | | |
| 18 | | | | | | | |
| 19 | | | | | | | |
| 20 | | | | | <u>58.50</u> | | |
| 21 | | | | | | | |
| 22 | MILEAGE REIMB @ 47 CENTS PER MILE | | | | | | |
| 23 | | | | | | | |
| 24 | ENTER DATE IN COLUMN A AND MILES IN COLUMN B | | | | | | |
| 25 | | | | | | | |
| 26 | | MILES | RATE | AMOUNT | | | |
| 27 | | | | | | | |
| 28 | 6/8/2016 | 117 | 0.470 | 54.99 | From Office | | |
| 29 | 6/9/2016 | 117 | 0.470 | 54.99 | From Crossville to Office | | |
| 30 | | | 0.470 | - | | | |
| 31 | | | | | | | |
| 32 | | | | | | | |
| 33 | | | | | | | |
| 34 | | | | | <u>109.98</u> | | |
| 35 | | | | | | | |
| 36 | | | | | | | |
| 37 | LODGING TOTAL | | | | <u>91.87</u> | | |
| 38 | ENTER TOTAL LODGING FOR TRIP. DO NOT | | | | | | |
| 39 | BREAK DOWN TOTAL BY DAY. ATTACH INVOICE. | | | | | | |
| 40 | | | | | | | |
| 41 | | | | | | | |
| 42 | OTHER EXPENSES: | | | | | | |
| 43 | ENTER BRIEF DESCRIPTION IN COLUMN A AND AMT IN COLUMN D | | | | | | |
| 44 | | | | | | | |
| 45 | | | | | | | |
| 46 | | | | | | | |
| 47 | | | | | | | |
| 48 | | | | | | | |
| 49 | | | | | | | |
| 50 | | | | | | | |
| 51 | | | | | | | |
| 52 | SUMMARY | | | | | | |
| 53 | \$ | 58.50 | PER DIEM REIMBURSEMENT @\$39 PER DAY (3/4 1ST & LAST DAYS) | | | | |
| 54 | | 109.98 | MILEAGE REIMB @ 47 CENTS PER MILE | | | | |
| 55 | | 91.87 | LODGING TOTAL | | | | |
| 56 | | - | OTHER EXPENSES: | | | | |
| 57 | \$ | <u>260.35</u> | REIMBURSEMENT REQUESTED | | | | |
| 58 | | | | | | | |
| 59 | 6/10/2016 11:23 | | | | | | |



Hotels.com

Hotels.com Confirmation Number : **130204812973**

Booked: Online - Tuesday, June 7, 2016 10:11:23 PM CDT

Your Receipt

Billing Name: Robert Moore

Booking Details

| | | | |
|-------------------|-------------------------|----------------|---------------------------------|
| Guest Name: | Robert Moore | Room Type: | Room, 2 Queen Beds, Non Smoking |
| Check-in: | Wednesday, June 8, 2016 | Hotel Details: | Baymont Inn and Suites |
| Check-out: | Thursday, June 9, 2016 | | Crossville |
| Number of Nights: | 1 | | 4038 Highway 127 N |
| Number of Rooms: | 1 | | Crossville |
| | | | US |
| | | | +19314569338 |

| | |
|--------------------------|---------------|
| Charges: | USD \$ |
| Wednesday, June 8, 2016: | \$78.35 |
| Discount applied: | \$0.00 |

| | |
|--|---------|
| Sub-total: | \$78.35 |
| Tax recovery charges and service fees: | \$13.52 |

Total Price: \$91.87

| | |
|---------------------|------------------|
| Amount paid: | \$91.87 |
| Amount still due: | \$0.00 |
| Payment Method: | MasterCard |
| Credit Card Number: | 541931XXXXXX6649 |

Cancellation Policy

Special non-refundable rate

This special discounted rate is non-refundable. If you choose to change or cancel this booking you will not be refunded any of the payment.

You were charged for the full payment of this booking.

Any additional charges and fees incurred during your stay will be charged to your hotel's local currency and may be subject to a foreign exchange fee.

This receipt was printed on: Friday, June 10, 2016 11:20:19 AM CDT

This is not a VAT invoice.

Retain this copy for statement verification.

Please note that if you make changes in your booking, they could result in charges applicable by policy and availability.

Your booking confirmation does act as payment proof. Therefore, the "tax" charges referred to on your reservation confirmation do not relate to sales taxes charged to you by Hotels.com, but to any transaction taxes incurred by Hotels.com (e.g. sales and use, hotel occupancy tax, excise tax, etc.) that Hotels.com pay directly to the hotel in relation to your reservation.

Please see the website for Terms and Conditions:

https://www.hotels.com/customer_care/terms_conditions.html

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

June 1, 2016

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

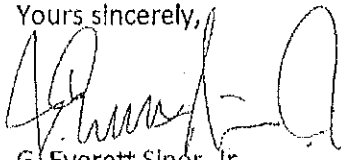
RE: May 2016 Billings – RMI/Laurel Hills Water System in Receivership

VIA UNITED STATES FIRST CLASS MAIL & ELECTRONIC MAIL

Dear Mr. Moore:

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

Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosure

G. Everett Sinor, Jr., Attorney at Law

| <u>Date</u> | <u>Description</u> | <u>Hours</u> | <u>Rate</u> | <u>Fee</u> |
|-------------|--|--------------|-------------|------------|
| 5/2/2016 | Review of Volunteer Electric bill & email from Lansford & Stephens; forward same to C Smith; drive to and from and participation in meeting w E Merrick & V Broemel in anticipation of rate hearing; pre-hearing conferene with Monica Smith-Ashford on LHWS matter; meeting with R Moore re same | 2.8 | | |
| 5/3/2016 | Emails to Heather @ T Stephens' office re billed customers; preparation of third supplemental response to discovery of CAD; modifications to fourth report to court; review of M Hargis email re insurance; preparation of stipulated filing | 2.1 | | |
| 5/4/2016 | Review of R Moore email on stipulated filing; prep and finalization of stipulated filing and third supplemental response; discussion with M Hargis re lack of insurance and review of email re same; email to J Bryant & R Moore re same; review of R Moore's billings; distribution of respnoses; call to E Merrick re stipulated filing; email from M Hargis with update on insurance | 2.5 | | |
| 5/5/2016 | Trip to Crossville; meeting w W Harkleroad & J Moore to discuss options for plan moving forward and decision by Chancellor Thurman on community club; meeting w Heather at Lansford Stephens office re accounting and reports; trip to COUD offices; mtg w E Bolin, G Williams & MC Deck re LHWS; drive to Renegade mtn in Crab Orchard to vlew development and water tower; drive to Nashville; review and respond to E Merrick email re work papers and cross exam | 9.0 | | |
| 5/6/2016 | Review of J Moore email on order of Chancellor Thurman re community club dispute; reivew of E Merrick email with workpapers; emails to E Merrick & R Moore re same; emails w M Hargis, R Moore & J Bryant re insurance; meeting (2) with R Moore to discuss LHWS issues, including upcoming hearing | 2.8 | | |
| 5/8/2016 | Preparation for TRA rate hearing | 2.3 | | |
| 5/9/2016 | review of J Moore letter in 16-00012; Meeting with R Moore prior to TRA rate hearing; T C w E Merrick prior to hearing; drive to and from TRA offices for hearing; emergency rate hearing; post hearing meeting w R Moore to discuss plan of receivership, accounting, meeting with community club on Renegade Mtn., rate filing with receivership court, and fourth report | 6.3 | | |

| | | |
|-----------|--|-----|
| 5/10/2016 | review of R Boston's new letter from Cumberland Co., call to Chancellor Thurman's sec'y to get court date; call to J Moore to set up community mtg., email to R Moore re same, email to Heather @ T Stephens office re Cumberland Pointe A/R balance, revisions to fourth report to court; T.C. w R Moore re numerous issues re LHWS; prepare draft of community meeting notice; mail same to Heather & R Moore; T.C. w B Gastel re procuring loss letter; numerous emails to M Hargis re: binding insurance | 2.3 |
| 5/11/2016 | email to Heather re public notice; reivew of accounting documents from Lansford & Stephens; email to R Moore re accounting; conf. call w R Moore & C Smith re accounting and fourth report; revisions to fourth report to include accounting | 2.0 |
| 5/12/2016 | Review J Moore email re notice of meeting; T.C. w B Gastel re loss letter; T.C. w Aida @ Chancellor Thurman's office, R Moore, S Bozarth, E Merrick, & Connie at the Cumberland County C&M re court date for motion on rate hearing; fourth report revisions; conf call w J Bryant, R Moore & C Smith re cash flow problems; insurance payment, COUD bills, Cumberland Pointe A/R, and other LHWS problems | 2.7 |
| 5/13/2016 | Email from Heather & Lansford & Stephens re Cumberland Pointe receivable; emails to R Moore & Heather re same; T.C. w Sean McMillan re Integra's interest in the LHWS; email to S McMillan & R Moore re same; T.C. (2) w Matt Klein w Tennessee Water Service, Inc. re LHWS; fourth report revisions w numerous emails & calls to RMI officials to complete; emails to R Moore & M Klein re LHWS; email to S Bozarth w Fourth report draft and affidavits | 4.3 |
| 5/16/2016 | Review of E Merrick email w draft letter for rate filing; email to R Moore re same; ;email to S Bozarth re \$33.10 rate order & CAD letter | 0.1 |
| 5/17/2016 | Call w R Moore re American Water inquiry, and 3 other inquiries for acquisition and/or operation of LHWS; T.C. w R Moore re M McClung request for different meeting location | 0.3 |
| 5/18/2016 | T.C. w R Moore re change of location for community mtg; T.C. w J Moore about revised meeting; preparation of revised meeting notice & email to Heather & Lansford & Stephens re same | 0.2 |
| 5/19/2016 | T.C. w S Bozarth re different LHWS matters; email J Cowan the R Moore affidavit; T.C. w J Cowan re same; email to M Hargis re loss letter | 0.3 |

| | | | | |
|-----------|---|-------------|-----------------|-------------------|
| 5/20/2016 | Finalize fourth report & email; T.C. w B Gastel re no loss letter and his representation of LHCondos POA; email of revised notice to interested persons of community meeting; T.C. w R Moore re numerous LHWS issues; review proposed accounting; email to V Broemel re transportation to Renegade Mtn.; email to M McClung re no loss letter | 2.0 | | |
| 5/23/2016 | Review of Moy Toy responses to Show Cause order; Relview of TRA Order Recommending Rate; M McClung & M Hargis emails re "loss letter" for insurance purposes; work on motion to institute new rate and memorandum in support | 1.9 | | |
| 5/24/2016 | work on motion to institute new rate, memorandum in support, affidavit of R Moore and proposed order; T.C. (2) w R Moore re LHWS Items, motion and affidavit; review of TRA order striking motion to alter or amend; review proposed accounting; preparation of pleading to attach accounting; email to D Kendall @ AquaGreen Utility, S McMillan w Integra Water and M Klein w Tennessee Water System re: 4th reports and community mtg notice | 2.7 | | |
| 5/25/2016 | M Klein email on Renegade Mtn comm mtg and return email; email to V Broemel re transportation to community mtg; T.C. w S Bozarth re TRA hearing docs and filing with Cumberland County C&M; T.C. w R Moore re motion for institution of new rate and accountiung; finalize all documents for filing with Cumberland County C&M; mtg w R Moore re outstanding LHWS items and prep for community club meeting | 3.3 | | |
| 5/26/2016 | T.C. w J Cowan re distribution of docs; T C w R Moore re same; typo correction on order, and second version; preparation of revised notes for community meeting; email to R Moore re same | 0.5 | | |
| 5/27/2016 | Finalize revised notice for community meeting; email to Chancellor Thurman and distribution list for motion for new rate and accounting; review of TRA petition for order for show cause to LH Condos POA; drive to Crab Orchard, TN for community meeting; attendance and participation in community mtg; T.C. w B Stewart re developments w LHWS | 7.3 | | |
| 5/29/2016 | Travel back from Crab Orchard to Nashville | 2.0 | | |
| 5/31/2016 | Email from J Moore re TRA show cause petition and response; T C w R Moore re plan, comm mtg and G Logue letter; T.C. w James Thomas, Treasurer of Cumberland Pointe re community meeting and probable reaction to new rate; email to R Moore re Thomas conversation; email from R Schwerer re Greg Logue's letter and titling issues on Renegade Mtn | <u>1.3</u> | | |
| | Hourly Billing Total | 61.0 | \$140.00 | \$8,540.00 |

| | | <u>Miles</u> | <u>Rate</u> | |
|-----------|--------------------------------------|--------------|---------------|-----------------|
| 5/5/2016 | Mileage (Nashville to Crossville) | 113.2 | | |
| 5/5/2016 | Mileage (Crossville to Crab Orchard) | 10.1 | | |
| 5/5/2016 | Mileage (Crab Orchard to Nashville) | 123.3 | | |
| 5/27/2016 | Mileage (Nashville to Crab Orchard) | 123.3 | | |
| 5/29/2016 | Mileage (Crab Orchard to Nashville) | <u>123.3</u> | | |
| | Mileage Total | 493.2 | \$0.47 | \$231.80 |

| | | | | |
|-----------|--|---------|--|--|
| 5/4/2016 | Postage for TRA filing on 3d supp. response & filing | \$44.54 | | |
| 5/5/2016 | Travel Day Meals Per Diem | \$29.25 | | |
| 5/9/2016 | Parking for TRA hearing | \$10.00 | | |
| 5/20/2016 | Postage for filing of fourth report | \$64.90 | | |
| 5/27/2016 | Travel Day Meals Per Diem | \$29.25 | | |

Other Expenses Reimburseable Total \$177.94

Balance Owed this month **\$8,949.74**

Previous Balance Owed \$11,265.97

Total Amount Due and Payable **\$20,215.71**

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

Parking for TPA
hearing

Rcpt# 13279
05/09/16 14:40 L# 1 A# 1 Txn# 75488
05/09/16 12:40 in 05/09/16 14:40 out

Tkt# 082878
Normal Fee \$ 10.00
Total Fee \$ 10.00
Visa \$ 10.00-
XXXXXXXXXXXX3218
Change Due \$ 0.00

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

05/20/16 05:04 PM

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COUPONS, SPECIALS, FACEBOOK FRIDAY!!



| | | | |
|-----|----------------------------------|-------|-------|
| 001 | 000008 (022) | TO \$ | 11.53 |
| | Priority Mail | | |
| | Tracking# 9405510200793009338989 | | |
| 002 | 001040 (001) | TO \$ | 9.10 |
| | Ground Commercial | | |
| | Tracking# 1Z66321F0303329048 | | |
| 003 | 000008 (022) | TO \$ | 11.53 |
| | Priority Mail | | |
| | Tracking# 9405510200828032188620 | | |
| 004 | 001040 (001) | TO \$ | 9.68 |
| | Ground Commercial | | |
| | Tracking# 1Z66321F0369998309 | | |
| 005 | 000008 (022) | TO \$ | 11.53 |
| | Priority Mail | | |
| | Tracking# 9405510200883073513402 | | |
| 006 | 000008 (022) | TO \$ | 11.53 |
| | Priority Mail | | |
| | Tracking# 9405510200830169731134 | | |

SubTotal \$ 64.90

Total \$ 64.90

Master Card \$ 64.90

ACCOUNT NUMBER * *****8930

Appr Code: (S) Sale

Receipt ID 82997713039377888170 006 Items
CSH: JOEY Tran: 3155 Reg: 002

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

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

05/04/16 04:59 PM

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shipping, postal and business needs.

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COUPONS, SPECIALS, FACEBOOK FRIDAY!!



| | | | |
|-----|------------------------------|-------|-------|
| 001 | 001040 (001) | TO \$ | 9.24 |
| | Ground Commercial | | |
| | Tracking# 1Z66321F0399699433 | | |
| 002 | 020587 (002) | T1 \$ | 3.05 |
| | 12x9x3 Box | | |
| 003 | 500005 (025) 400005000058 | T1 \$ | 4.45 |
| | Manilla Medium 12X9 QTY 5 | | |
| | Reg Unit Price \$ | 0.89 | |
| 004 | 500051 (022) | TO \$ | 27.10 |
| | First Class Mail QTY 5 | | |
| | Reg Unit Price \$ | 5.42 | |

SubTotal \$ 43.84

State and County Tax (T1) \$ 0.70

Total \$ 44.54

Debit Card \$ 44.54

Receipt ID 82997713279395888073 012 Items
CSH: Diane Tran: 3139 Reg: 002

Sale

*****3218

Debit Entry Method: Swiped
Acct Type: Checking

Trace:00000012 Appr Code:070220
Retrieval #:MI0047492423 Batch #:

Amount \$ 44.54

Merchant Total \$ 44.54

Approved

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.

RMI EXP RECOVERABLE LHWD
5/1/16 Through 5/31/16

| Category Description | 5/1/16- 5/31/16 | OVERALL TOTAL |
|---------------------------|--------------------|------------------|
| 5100 FEES RMI | | |
| 5300-RECEIVERS FEES | -491.70 | -491.70 |
| 5610-CONTRACT LABOR RMI | -7,343.65 | -7,343.65 |
| 5690-RMI OH EXPENSE | -899.50 | -899.50 |
| TOTAL 5100 FEES RMI | -8,734.85 | -8,734.85 |
| 5150 FEES LEGAL | | |
| 5400-LEGAL FEES | -8,949.74 | -8,949.74 |
| TOTAL 5150 FEES LEGAL | -8,949.74 | -8,949.74 |
| 5150 FEES OTHER | | |
| 5697-OTHER CONTRACT LABOR | -486.59 | -486.59 |
| TOTAL 5150 FEES OTHER | -486.59 | -486.59 |
| 5300 EXPENSES | | |
| 6060-RENT | -35.46 | -35.46 |
| 6205-COPIES | -44.30 | -44.30 |
| 6210-POSTAGE | -14.75 | -14.75 |
| 6215-COURIER & OVERNIGHT | -73.99 | -73.99 |
| 6350-TRAVEL EXPENSE | -404.70 | -404.70 |
| TOTAL 5300 EXPENSES | -573.20 | -573.20 |
| OVERALL TOTAL | -18,744.38 | -18,744.38 |

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

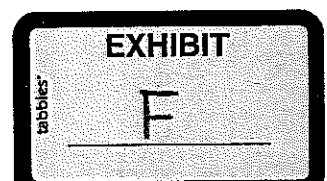
STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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 May 1, 2016 through May 31, 2016.



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.

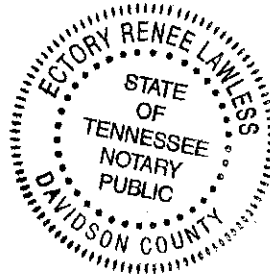
Kelly Cashman Grams
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this

23rd day of June, 2016.

Rectorry R Lamfess
NOTARY PUBLIC

My commission expires: 1/9/2018



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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

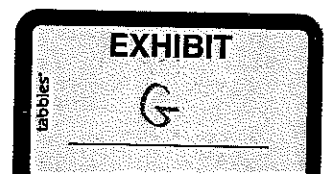
STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval 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 May 1, 2016 and May 31, 2016.



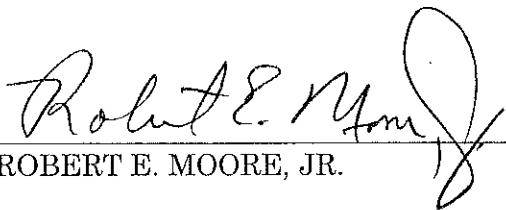
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

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

[intentionally blank]

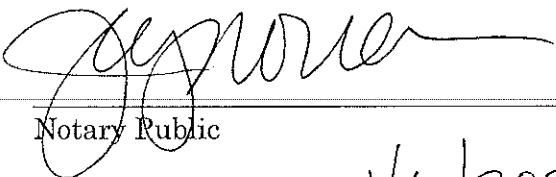
6. Based upon an initial review of financial documentation for LHWS, it does not appear that there are assets available for matters beyond the operational needs of LHWS. There are not sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's 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 \$18,744.38 (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
24th day of June, 2016.



Notary Public
Commission Expires: 1/6/2020



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

TENNESSEE REGULATORY AUTHORITY

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

} Docket No. 2012-CH-560
} Chancellor Thurman

ORDER GRANTING RECEIVER'S MOTION

On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the ___ day of June, 2016, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for May 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 \$18,744.38, 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:



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:

Shiva K. Bozarth, Esq.
Chief of Compliance
Counsel for Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

Laurel Hills Condominiums
Property Owners Association
Post Office Box 78
Crab Orchard, Tennessee 37723

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.