

G. EVERETT SINOR, JR.
Attorney at Law

December 2, 2016

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

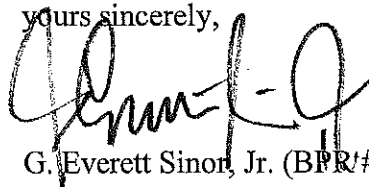
Dear Ms. Tollett:

Please find enclosed herewith the following:

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

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

yours sincerely,



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

Enclosures

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

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560
Chancellor Thurman

FILED
Date 12-5, 2016 at 1:05 ^{AM} PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett AP

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

Robert E. Moore, Jr., Attorney and Chief Operations Officer of Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed Receiver of the Laurel Hills water system [hereinafter the "LHWS"] previously controlled by Laurel Hills Condominiums Property Owners Association [hereinafter the "Laurel Hills Condominiums POA"], submits this, the Receiver's Tenth Report, and moves this Honorable Court for an order approving the fees and expenses presented for payment by the Receiver and authorizing payment to the Receiver of certain fees and expenses and for an interim taxation of costs.

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

Code Ann. §§ 65-3-105 and 29-1-101, the Court appointed Receivership Management, Inc. as Receiver of the Laurel Hills Water System by order dated October 26, 2015.¹

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

Implementation of Receivership Plan

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

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

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

² See the Receiver's second, third, fourth, fifth, sixth, seventh, eighth and ninth reports, filed with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016, June 27, 2016, August 4, 2016, August 26, 2016, October 3, 2016, and November 10, 2016, respectively.

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

The November 14, 2016 Hearing & Status Conference

6. On November 14, 2016 in Cookeville, this Honorable Court heard argument on the Authority's show cause motion, Moy Toy, LLC's ["hereinafter Moy Toy"] motion to intervene, and the Laurel Hills Condominiums POA's motion to enforce settlement agreement and dismiss show cause order. The Court also received a status update from the Receiver. At that hearing, this Honorable Court granted Moy Toy's motion to intervene and ordered the parties, including Moy Toy, to participate in a global mediation session. The Receiver and the parties to this lawsuit are currently working on getting that global mediation session organized. A motion has been or will be filed by the Receiver in the condemnation action, seeking Terra Mountain Holdings, LLC's participation in said global mediation session or a similar mediation session.

Operations and Other Activities of the Receiver

7. As previously reported, effective July 1, 2016, a new rate of \$114.24 per month was instituted for the LHWS. In November of 2016, 98 of the 131 customers of the LHWS have now paid their water bill. Of the 33 non-paying customers, 21 are in the Cumberland Pointe condominium units, and 12 are located elsewhere on Renegade Mountain. No decision has yet been made by the Receiver as to whether to cut water off to

the non-paying customers of the LHWS that are not residences within the Cumberland Pointe condominium units. As previously reported, the Receiver understands that the Cumberland Pointe Homeowners' Association has cut water off to non-paying customers within those condominium units.

8. Further as previously reported, Mr. Gerald Williams has indicated to the Receiver that he does not wish to continue to provide engineering/operational services for the LHWS any longer. The Receiver continues to search for a properly licensed operator to provide these services for the LHWS. Mr. Williams has fixed the supply leak repair. Substantial cost savings are expected from this repair, although the costs to operate the system may rise in the near future.³ The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

Financial Information

9. As of November 29, 2016, there was an accounts receivable past due balance of \$16,848.55.⁴ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

10. On a cash basis, LHWS had a net gain in October 2016 of \$11,241.98.⁵ See Exhibit B, attached hereto and incorporated herein by reference. As of October 31, 2016,

³ Mr. Williams' November 21, 2016 electronic mail to the Receiver pertaining to this leak reads as follows:
Gentlemen: I have finished the repair on the leak going up the Mountain. I was able to move the pipe back up the hill and raise it back up where it was suppose [sic] to be. I will include two pictures. I under estimated the leak by a little bit. I figured around 2 gpm but according to my pumping numbers, it was leaking at 3 1/2 gpm = 5,000 gallons per day. I was able to do the repair a little under my estimate due to the fact I did most of it myself. Since it was a little under, I also put a temporary restraint on the weak joint (not leaking) up close to the top. I have ordered some restraint lugs so I can put a permanent restraint on it. The original estimate to repair the leak will also cover the stabilization of this joint. The water savings over a 2 month period will cover the cost of the repairs. I will send an invoice when I get the other joint stabilization finished. I informed you that as of 11/1/16, I would be increasing my monthly fee to 750.00 per month. I can use the extra to hire someone to help me try to find the rest of the leaks up there by the end of the year. ...

⁴ Of this amount, \$3802.51 is less than a month past due, and \$13,046.04 is more than a month past due. See Exhibit A.

LHWS had a balance of \$23,972.70 in its main operating account.⁶ See Collective Exhibit C, attached hereto and incorporated herein by reference.

11. The LHWS was able to meet current obligations in October of 2016.⁷ Though the LHWS has a relatively large accounts receivable balance, all past due payable balances have been satisfied.

Cash Flow Projection – Anticipated Problems

12. As previously reported, even laying aside Mr. Matherne's current and projected fees and expenses, the LHWS still faces a cash flow problem. In its projection, the Receiver attributes the cash flow problem to the fact that less customers are paying their bill than was initially projected. The Receiver continues to estimate that a break-even point for the Receiver's fees and expenses is closer to \$5500.00.

13. At its current pace, the Receiver continues to anticipate that the LHWS will run out of money in December of 2016.⁸ When this occurs, it will be necessary for further interim taxation of costs to take place to make up the difference.

Fees and Expenses of Receiver

14. Pursuant to the Amended Order Appointing Receiver, compensation for the Receiver is payable from funds or assets of the LHWS, if such funds are available. If the funds or assets of the LHWS are not available to pay Receivership fees and costs, then those fees and costs are to be taxed as interim court costs to be paid by the Authority. The

⁵ This is a bit misleading, in that there were virtually no bills paid in October—all outstanding bills were paid in November.

⁶ Id.

⁷ It should be noted that this does not include costs of this matter previously taxed on an interim basis to the Tennessee Regulatory Authority, which amount to \$89,493.23 (the amount taxed to the Authority prior to the July 1, 2016 increase in rates), AS WELL AS \$7263.00 (the amount taxed to the Authority to reflect Mr. Matherne's fees and expenses).

⁸ Again, this does not take into account Mr. Matherne's projected fees and expenses, nor does it take into account previous costs and expenses of the receivership estate taxed on an interim basis to the Authority.

Receiver is to submit invoices to the Authority on a monthly basis for approval. These invoices are reviewed and paid after approval of the Authority and the Court, through an interim taxation of costs, if necessary.⁹

15. As shown in Collective Exhibit D, attached hereto and incorporated herein by reference, Mr. Robert E. Moore, Jr, Chief Operations Officer of the Receiver, and other persons at the Receiver's office, including Mr. Cody Smith and Ms. Jere Cowan, performed work for this Receivership for the period of October 1, 2016 through October 31, 2016 in the amount of \$1673.86.¹⁰ Mr. Sinor, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period October 1, 2016 through October 31, 2016 in the amount of \$2277.40. Mr. Matherne, working on contract for the Receiver under Mr. Moore, has performed work for the Receivership and has incurred fees and expenses as shown in Collective Exhibit D for the period October 1, 2016 through October 31, 2016 in the amount of \$14,298.45.

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

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

¹⁰ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of September 1, 2016 through September 30, 2016, which total \$302.36.

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 October of 2016: \$1673.86; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for October of 2016: \$2277.40; and,
- c. Invoice for Mr. Matherne working under Mr. Moore for October of 2016: \$14,298.45.

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

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Motion for Approval of Fees and Expenses and Authorization for Payment

Accordingly, the Receiver respectfully **MOVES** this Court for an order approving the fees and expenses as set forth herein in the aggregate amount of \$18,249.71, and further **MOVES** this Court to (a) authorize payment of fees and expenses out of Laurel Hills Water System in Receivership estate's funds in the amount of \$3951.26 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Authority on an interim basis in the amount of \$14,298.45 (constituting the amount of Mr. Matherne's fees and expenses).

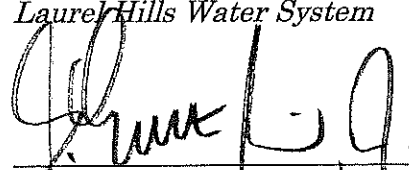
DATED: December 2, 2016.

Respectfully Submitted,

Laurel Hills Water System in Receivership

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

by permission -
granted by e-mail
on 11/30/16


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

Certificate of Service

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

James R. Layman, Esq.
Staff Attorney
Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

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

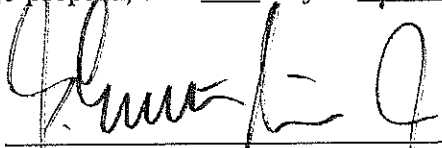
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
105 Bruce Street
Sevierville, Tennessee 37862

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

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

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

via the United States Mails, postage prepaid, this 2nd day of December, 2016.



G. Everett Sinor, Jr.

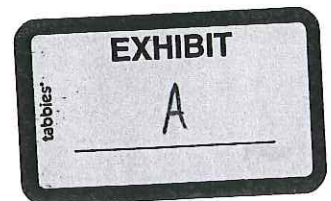
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11/29/16

**Laurel Hills Water System In Receivership
A/R Aging Summary
As of November 29, 2016**

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BENSON, CYNTHIA L	0.00	114.24	0.00	0.00	0.00	114.24
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	89.24	178.48	496.20
CECCHETT, DON & DIANNE	0.00	32.59	0.00	0.00	0.00	32.59
GPCA (84)	0.00	2,399.04	2,741.76	2,513.28	5,026.56	12,680.64
HEIRS, LUKE & ANNA DUNN	0.00	114.24	114.24	114.24	294.68	637.40
HENMAN, MIKE	0.00	0.00	0.04	0.00	0.00	0.04
JUDD, JONATHAN	0.00	114.24	0.00	0.00	0.00	114.24
LATHAM, KENT	0.00	114.24	114.24	114.24	0.00	342.72
Laurel Hills Condo Assoc (#5101)	0.00	114.24	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5102)	0.00	114.24	0.00	0.00	0.00	114.24
Laurel Hills Condo Assoc (#5103)	0.00	114.24	0.00	0.00	0.00	114.24
LOUD, PAUL F.	0.00	114.24	0.00	0.00	0.00	114.24
MANERS, EMMETT	0.00	114.24	0.00	0.00	0.00	114.24
MCQUEEN, DARRELL E	0.00	114.24	114.24	0.00	0.00	228.48
MILLER, DAVID	0.00	114.24	114.24	114.24	989.78	1,332.50
SCHWARTZ, ROBERT	0.00	0.00	0.00	0.00	298.30	298.30
TOTAL	0.00	3,802.51	3,313.00	2,945.24	6,787.80	16,848.55

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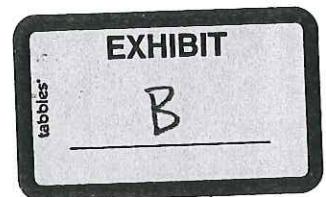
LAUREL HILLS WATER DISTRICT
 SCHEDULE OF RECEIPTS, DISBURSEMENTS AND NET ASSETS
 (WATER OPERATIONS ONLY)

	FOR THE PERIOD		
	10/26/2015 9/30/2016	10/1/2016 10/31/2016	10/26/2015 10/31/2016
RECEIPTS			
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	72,679.25	11,310.24	83,989.49
TOTAL REVENUE	72,679.25	11,310.24	83,989.49
DISBURSEMENTS			
FEES			
5695-ACCOUNTING FEES	1,200.00	-	1,200.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
TOTAL FEES	3,594.56	-	3,594.56
OTHER EXPENSES:			
5697-OTHER FEES	100.00	-	100.00
5930-TAXES	1,624.00	68.26	1,692.26
6060-RENT	-	-	-
6190-EQUIPMENT MAINTENANCE	349.78	-	349.78
6215-COPIES POSTAGE & SHIPPING	130.00	-	130.00
6220-TELEPHONE & INTERNET	-	-	-
6230-OFFICE SUPPLIES	45.58	-	45.58
6250-PRINTING	-	-	-
6260-STORAGE	-	-	-
6270-MOVING EXPENSE	-	-	-
6290-UTILITIES	31,993.15	-	31,993.15
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE	10,145.70	-	10,145.70
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	45,007.49	68.26	45,075.75
TOTAL EXPENSES	48,602.05	68.26	48,670.31
NET RECEIPTS LESS DISBURSEMENTS	24,077.20	11,241.98	35,319.18
SCHEDULE OF CHANGE IN NET ASSETS			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	24,077.20	11,241.98	35,319.18
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	24,177.20		35,419.18
11/16/2016 12:40			
TOTAL ASSETS	20,197.20		22,348.34
TOTAL LIABILITIES	3,980.00		13,070.84
NET ASSETS	24,177.20		35,419.18

NOTE : FIGURES DO NOT INCLUDE ACCOUNT PAYABLE OWED/DUE TO TRA FOR RECEIVERSHIP FEE, OTHER CONTRACT LABOR, AND LEGAL FEES.

*NOTE: OCT 2016-NO UTILITIES OR INSURANCE EXP DUE TO PAYMENTS MADE AND RECORDED ON NOV 1ST 2016.

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 Cumberland County, Crossville, TN
 BY: Sue Tollett



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

10/31/2016

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	23,984.70	22,348.34
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	-	
DEPOSIT ON 10/31/2016		1,624.36
	<u>23,972.70</u>	<u>23,972.70</u>

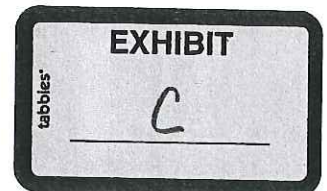
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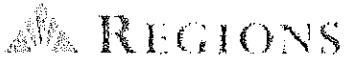
OUTSTANDING CHECKS

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2015 TAX PYMT 1,624.00
2016 TAX PYMT 1,230.00

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SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett





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
 October 1, 2016 through October 31, 2016

SUMMARY			
Beginning Balance	\$20,914.60	Minimum Balance	\$21,237
Deposits & Credits	\$12,934.60 +	Average Balance	\$24,067
Withdrawals	\$0.00 -		
Fees	\$0.00 -		
Automatic Transfers	\$0.00 +		
Checks	\$9,864.50 -		
Ending Balance	\$23,984.70		

DEPOSITS & CREDITS			
10/03	Deposit - Thank You		1,028.67
10/07	Deposit - Thank You		1,028.16
10/12	Deposit - Thank You		799.64
10/18	Deposit - Thank You		8,453.77
10/31	Deposit - Thank You		1,624.36
Total Deposits & Credits			\$12,934.60

CHECKS						
Date	Check No.	Amount	Date	Check No.	Amount	
10/03	1051	504.40	10/26	1055	68.26	
10/03	1052	201.00	10/21	1056	3,063.26	
10/31	1054 *	500.00	10/25	1057	5,527.58	
Total Checks					\$9,864.50	

* Break In Check Number Sequence.

DAILY BALANCE SUMMARY					
Date	Balance	Date	Balance	Date	Balance
10/03	21,237.87	10/18	31,519.44	10/26	22,860.34
10/07	22,266.03	10/21	28,456.18	10/31	23,984.70
10/12	23,065.67	10/25	22,928.60		

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

1

ACCOUNT #

0232618611

	053
Cycle	26
Enclosures	0
Page	2 of 2

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

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

Thank You For Banking With Regions!

Easy Steps to Balance Your Account

4a List any checks, payments, transfers or other withdrawals from your account that are not on this statement.

Checking Account

1.	Write here the amount shown on statement for ENDING BALANCE	\$
2.	Enter any deposits which have not been credited on this statement.	\$ +
3.	Total lines 1 & 2	\$ =
4.	Enter total from 4a (column on right side of page)	\$ -
5.	Subtract line 4 from line 3. This should be your checkbook balance.	\$ =

Check No.	Amount
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
Total Enter in Line 4 at Left	\$

The law requires you to use "reasonable care and promptness" in examining your bank statement and any checks sent with it and to report to the Bank an unauthorized signature (i.e., a forgery), any alteration of a check, or any unauthorized endorsement. You must report any forged signatures, alterations or forged endorsements to the Bank within the time periods specified under the Deposit Agreement. If you do not do this, the Bank will not be liable to you for the losses or claims arising from the forged signatures, forged endorsements or alterations. Please see the Deposit Agreement for further explanation of your responsibilities with regard to your statement and checks. A copy of our current Deposit Agreement may be requested at any of our branch locations.

Summary of Our Error Resolution Procedures
 In Case of Errors or Questions About Your Electronic Transfers
 Telephone us toll-free at 1-800-734-4667
 or write us at
 Regions Electronic Funds Transfer Services
 Post Office Box 413
 Birmingham, Alabama 35201

Please contact Regions as soon as you can, if you think your statement is wrong or if you need more information about a transfer listed on your statement. We must hear from you no later than sixty (60) days after we sent the FIRST statement on which the problem or error appeared.
 (1) Tell us your name and account number.
 (2) Describe the error or the transfer you are unsure about and explain as clearly as you can why you believe it is an error or why you need more information.
 (3) Tell us the dollar amount of the suspected error.
 If you tell us verbally, we may require that you send us your complaint or question in writing within ten (10) business days.

We will determine whether an error occurred within ten (10) business days after we hear from you and will correct any error promptly. If we need more time, however, we may take up to forty-five (45) days to investigate your complaint or question (ninety (90) days for POS transactions or for transfers initiated outside of the United States). If we decide to do this, we will credit your account within ten (10) business days for the amount you think is in error. If, after the investigation, we determine that no bank error occurred, we will debit your account to the extent previously credited. If we ask you to put your complaint in writing and we do not receive it within ten (10) business days, we may not credit your account.

New Accounts- If an alleged error occurred within thirty (30) days after your first deposit to your account was made, we may have up to ninety (90) days to investigate your complaint, provided we credit your account within twenty (20) business days for the amount you think is in error. If we decide there was no error, we will send you a written explanation within three (3) business days after we finish our investigation. You may ask for copies of the documents that we used in our investigation.

FOR QUESTIONS CONCERNING THIS STATEMENT OR FOR VERIFICATION OF A PREAUTHORIZED DEPOSIT, PLEASE CALL THE PHONE NUMBER ON THE REVERSE SIDE OF THIS STATEMENT OR VISIT YOUR NEAREST REGIONS LOCATION.

ADJ - Adjustment RI - Return Item CR - Credit SC - Service Charge OD - Overdrawn
 EB - Electronic Banking NSF - Nonsufficient Funds APY - Annual Percentage Yield FWT - Federal Withholding Tax *Break in Number Sequence

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

Jeanne Barnes Bryant

October 2016 Fees	\$0.00
October 2016 Overhead Expense	\$0.00

Receivership Management, Inc.

October 2016 Fees	\$1,371.50
October 2016 Overhead Expense	\$201.60
October 2016 Expenses	\$100.76

Everett Sinor

October 2016 Fees & Expenses	<u>\$2,277.40</u>
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Proposed Payment out of Receivership Estate	\$3,951.26
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Graham Matherne

October 2016 Fees & Expenses	<u>\$14,298.45</u>
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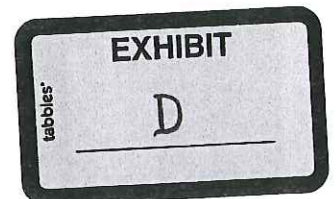
Proposed Interim Taxation of Costs	\$14,298.45
---	--------------------

FILED

Date: 12-5, 2016 at 1:02 ^{AM} ~~PM~~

Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN

BY: Sue Tollett



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT			October 2016
10/4/2016	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT AS OF 9/30/16	0.3 \$50.00 \$15.00
10/4/2016	Cody C. Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 09-30-16.	0.5 \$123.00 \$61.50
10/4/2016	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: WATER LEAK, PROPERTY MATTERS .25	0.25 \$153.00 \$38.25
10/6/2016	Anna M. Hunter	RECORD FEES & EXPENSES AS OF 9/30/16	0.2 \$50.00 \$10.00
10/6/2016	Cody C. Smith	RESPOND TO IRS LETTER CONCERNING TAX PYMT. PHONE CALL WITH TERRY STEPHENS CPA TO DISCUSS FILINGS AND EXTENSION FILING.	1 \$123.00 \$123.00
10/10/2016	Cody C. Smith	RESPOND TO IRS LETTER CONCERNING TAX PYMT ADJUSTMENTS.	0.5 \$123.00 \$61.50
10/11/2016	Robert E. Moore, Jr.	CALL FROM E.SINOR RE: PROPERTY STATUS ISSUES AT COUD .2	0.2 \$153.00 \$30.60
10/12/2016	Robert E. Moore, Jr.	EMAIL FROM E.SINOR RE: COURT STATUS HEARING .10	0.1 \$153.00 \$15.30
10/14/2016	Jere P. Cowan	EMAILS WITH E. SINOR RE: R. MOORE AFFIDAVIT; FORWARD SAME	0.2 \$50.00 \$10.00
10/14/2016	Robert E. Moore, Jr.	EMAIL TO J.LAYMAN RE: RMI BRIDGELINE AND USE .10	0.1 \$153.00 \$15.30
10/17/2016	Anna M. Hunter	UPDATE MONTHLY NET ASSETS. RESPOND TO EVERETT'S DOCUMENTATION REQUEST.	2 \$50.00 \$100.00
10/19/2016	Cody C. Smith	REVIEW LHWD CHANGE IN NET ASSETS AND TRIAL BALANCE FOR 9/30/16. EMAIL E. SINOR CONFIRMATION ON TOTALS. PHONE CALL WITH WATER TOWER CONSTRUCTION TEAM.	0.8 \$123.00 \$98.40

LAUREL HILLS WATER DISTRICT

Date	Staff	Description	Hours	Rate	Total
10/19/2016	Robert E. Moore, Jr.	ISELER DEMOLITION EMAIL RE: POTENTIAL SALE OF TOWER, FORWARD TO E.SINOR, EMAILS FROM AND TO E.SINOR RE: CUSTOMER CONCERNS OVER LIMITATIONS ON CAR WASHING AND YARD WATERING .10; CALL WITH E.SINOR RE: TIMING ISSUES ON PROPERTY MATTERS, STATUS HEARING, CONSUMER CONCERNS .4	0.5	\$153.00	\$76.50
10/20/2016	Cody C. Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 09-30-16. UPDATE NET ASSETS AND CREATE CASH FLOW PROJECTION THROUGH YEAR END.	2.2	\$123.00	\$270.60
10/20/2016	Jere P. Cowan	PREPARATION OF SUPPORTING FINANCIAL EXHIBITS FOR STATUS REPORT	0.2	\$50.00	\$10.00
10/20/2016	Jere P. Cowan	RECEIPT AND PROCESS TAX PAYMENT AND ACCOUNTING INVOICES; UPDATE FINANCIAL REGISTER RE: SAME; RECEIPT EXPENSE INVOICES; PROCESS PAYMENT FOR SAME	0.6	\$50.00	\$30.00
10/20/2016	Robert E. Moore, Jr.	APPROVE LETTER TO P.LOUD .10	0.1	\$153.00	\$15.30
10/21/2016	Cody C. Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD. DISCUSS CASH FLOW PROJECTIONS AND SHORTFALL IN WATER RECEIPTS WITH R. MOORE AND E. SINOR. PROVIDE FINANCIALS FOR REPORTS AND PROJECTIONS FOR BACK UPS.	3	\$123.00	\$369.00
10/21/2016	Jere P. Cowan	PROCESS INVOICE EXPENSE PAYMENTS	0.2	\$50.00	\$10.00
10/21/2016	Robert E. Moore, Jr.	REVIEW AND APPROVE REPAIR ESTIMATE ON SUPPLY PIPE .10; CONFERENCE CALL WITH THE COURT AND PARTIES .25	0.35	\$153.00	\$53.55
10/23/2016	Robert E. Moore, Jr.	EMAIL FROM M.MCCLUNG RE: DRIVEWAY STATUS AFTER PIPE REPAIRS, FORWARD TO GERALD WILLIAMS FOR INVESTIGATION AND RECOMMENDATION .10	0.1	\$153.00	\$15.30
10/24/2016	Robert E. Moore, Jr.	CALL WITH E.SINOR RE: SEARCH FOR NEW ENGINEER .10; CALL WITH G.MATHERNE RE: PROPERTY ISSUES .3;	0.4	\$153.00	\$61.20
10/25/2016	Robert E. Moore, Jr.	UPDATE FROM E.SINOR ON ENGINEER ISSUES AND REPORTING TIME LINE .2	0.2	\$153.00	\$30.60
10/27/2016	Robert E. Moore, Jr.	RESPOND TO EMAIL FROM M.MCCLUNG RE: DRIVEWAY AND REQUEST TO TURN OFF WATER, ADVISE WATER CUT OFF DOES NOT TERMINATE BILLING .10	0.1	\$153.00	\$15.30

LAUREL HILLS WATER DISTRICT		October 2016
10/31/2016	Cody C. Smith	\$36.90
	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	\$123.00
		0.3
Total		\$1,573.10

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

November 1, 2016

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

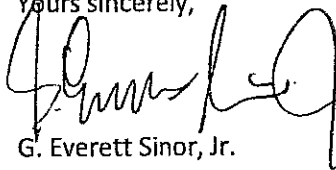
RE: October 2016 Billings – RMI/Laurel Hills Water System in Receivership

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.

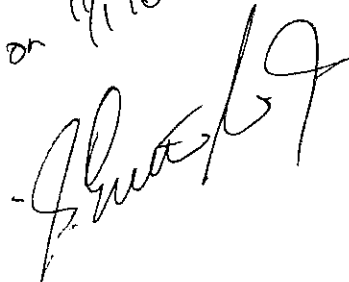
Yours sincerely,



G. Everett Sinor, Jr.
Attorney at Law

Enclosure

*Mailed & e-mailed
on 11/16*



G. Everett Sinor, Jr., Attorney at Law

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
10/2/2016	Review of 2 R Moore emails re LHWS water use notice and J Layman email; email from Cumberland Pointe	0.1		
10/3/2016	Email to A Levondosky w Chancellor Thurman's office with 8th report	0.1		
10/4/2016	review of G Matherne email & response; review of Lansford & Stephens deposit information; T.C w R Moore re water leak on Renegade Mtn	0.1		
10/5/2016	Voicemail for G Williams re leak; T.C. w G Williams re supply line leak; email to G Williams re same	0.3		
10/9/2016	Review of J Schemmel email re Eagle's Nest A/R balance; email response; email to T Stephens re same; review of G Matherne emails (2); response to G Matherne	0.5		
10/10/2016	Review of G Matherne email; voice mail to City of Crab Orchard; T.C. w G Matherne	0.5		
10/11/2016	T.C. w R Moore re LHWS pump station; review G Williams email on supply line leak; Voicemail from Michael Depew re status of receivership; T.C. w Mr. & Mrs. Depew re: same; email of 8th report to Mr. & Mrs. Depew	0.5		
10/12/2016	Review of J Layman email re conf call for scheduling conference; review of Lansford & Stephens email on deposit information; review of TRA motion re review conference	0.1		
10/13/2016	voicemail from Mike Henman re water use notice; email to G Williams & R Moore re same	0.1		
10/14/2016	review of G Williams emails on leak and invoice; review of J Layman email; voicemail left with A Levondosky (Chancellor Thurman's secretary); email to J Cowan re affidavit	0.1		
10/17/2016	review of D Carter email re billing for Cumberland Pointe; email to R Moore re same; review TRA motion; T.C. w Eddie Spout, realtor for John Butts, re water system	0.3		
10/18/2016	T.C. w R Moore re LHWS issues	0.2		
10/19/2016	request for info for 9th report to C Smith & T Stephens; review of L&S email on deposit and correspondence from Mr. & Mrs. Depew; email from J Layman coordinating conferenece call with Chancellor Thurman; R Moore email on correspondence; response to same; T.C. w E Bolin re pump station and tower; email to G Matherne; T.C. w G Matherne re pump station issues; T.C. w R Moore re development	1.7		

10/20/2016	T.C. w G Williams re email; letter to P. Loid; T.C. w C Smith; draft Loud letter; email same to R Moore	1.2		
10/21/2016	T.C. w J Layman & Kelly Cashman-Grams; conf. call w Chancellor Thurman; T.C. w G Matherne; T.C. w R Moore; email to approve supply line leak repair; transmission of Loud letter; T.C. w A Levondosky confirming date; T.C.s w potential new engineers/operators of LHWS; T.C. w K Cashman-Grams; T.C. w R Moore re LHWS issues; T.C. w K Cashman Grams; modification of show cause memorandum; meeting w R Moore & C Smith re LHWS cash flow & other LHWS operational issues	3.6		
10/24/2016	call to L Durham, potential operator; email for G Williams re new operator/engineer; T.C. w G Williams re same; T.C. (2) w G Matherne; finalize & filing of show cause memorandum; v.m. left for D Lewis, potential new operator; T.C. w D Lewis; T.C. (2) w R Moore re LHWS developments	1.8		
10/25/2016	T.C. w K Cashman-Grams re cash flow on LHWS; notes on show cause hearing and punchlist of items; review of G Matherne email on Kemmer property; v.m. for Mr Kemmer; T.C. w E Bolin re Kemmer property; email to D Carter re billing for Cumberland Pointe; T.C. w D Lewis re engineer/operator; T.C. w G Matherne re LHWS; review D Carter email on billing; response re same; T.C. w R Moore re sequencing/timing and other LHWS matters	1.8		
10/26/2016	Voice mail from J Kemmer; T.C w E Bolin re easements; email to G Matherne re same; T.C. w J Kemmer about original easement to Kemmer property for LHWS; email to G Matherne re same; email to G Matherne re condemnation petition and easement	0.4		
10/27/2016	G Matherne email with easement language; review of easement forms; review of condemnation petition; review of R Moore email to M McClung; easement forms sent to E Bolin, R York & J Kemmer; cover letter to J Kemmer	2.3		
10/28/2016	review of Moy Toy amended petition at TRA and other docs in Moy Toy procedeeding	0.1		
10/31/2016	T.C. w J Kemmer re easement form; T.C. w G Matherne re same; amended order to G Matherne	<u>0.4</u>		
	Hourly Billing Total	16.2	\$140.00	\$2,268.00
		<u>Miles</u>	<u>Rate</u>	
	Mileage Total	0.0	\$0.47	\$0.00
10/24/2016	Postage for Show Cause Memorandum	\$9.40		

Other Expenses Reimburseable Total	<u>\$9.40</u>
Balance Owed this month	\$2,277.40
Previous Balance Owed	\$3,458.62
Total Amount Due and Payable	\$5,736.02

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

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

***** DUPLICATE RECEIPT *****

10/24/16 04:41 PM

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



001 008237 (022)	TO \$	6.78
First Class Package		
Tracking# MMWJNUUBNWZ5K		
002 008237 (022)	TO \$	2.62
First Class Package		
Tracking# MMWJNUUBVE2A2		

SubTotal \$ 9.40
Total \$ 9.40

Master Card \$ 9.40

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

A handwritten signature in black ink, appearing to read "Blaine J. C.".

Receipt ID 82997712561103888382 002 Items
CSH: TONYA Tran: 6641 Reg: 002

**DON'T LIKE TO WRAP, WE GOT YOUR BACK!
GET 15% OFF YOUR HOLIDAY GIFT WRAPPING!**

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*Postage for show card
Memorandum*

WYATT, TARRANT & COMBS, LLP
2525 WEST END AVENUE
SUITE 1500
NASHVILLE, TENNESSEE 37203
F.E.I. # 61-0468003
(615) 244-0020

NOVEMBER 7, 2016
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1023553

LANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
O RECEIVERSHIP MANAGEMENT, INC.
O. BOX 2307
ENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH OCTOBER 31, 2016

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$14,013.00
OTHER CHARGES AND DISBURSEMENTS	\$285.45
TOTAL THIS INVOICE	\$14,298.45
PREVIOUSLY BILLED AND OUTSTANDING	\$7,263.00
TOTAL AMOUNT DUE	\$21,561.45
	=====

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

WYATT, TARRANT & COMBS, LLP
2525 WEST END AVENUE
SUITE 1500
NASHVILLE, TENNESSEE 37203
F.E.I. # 61-0468003
(615) 244-0020

NOVEMBER 7, 2016
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1023553

KANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
O RECEIVERSHIP MANAGEMENT, INC.
O. BOX 2307
CENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH OCTOBER 31, 2016

11/03/16	TRAVEL TO AND FROM CROSSVILLE REGARDING REVIEW OF DOCUMENTS AT REGISTER OF DEED'S OFFICE; MEETING WITH D. KENDALL AND LENGTHY EFFORT TO REVIEW DOCUMENTS AT REGISTER OF DEED'S OFFICE; TRIP TO RENEGADE MOUNTAIN SITE. J. GRAHAM MATHERNE 9.00 hours at 270.00 per hour.	2430.00
11/04/16	REVIEW MATERIALS FROM CUMBERLAND COUNTY REGISTER OF DEED'S OFFICE (.80); FURTHER DRAFTING AS TO POTENTIAL ACTION (.50); DRAFT CHECK LIST OF NEXT STEPS (.20). J. GRAHAM MATHERNE 1.50 hours at 270.00 per hour.	405.00
11/06/16	FURTHER WORK AS TO REVIEW OF FACTS AND FILE DOCUMENTS AS TO POTENTIAL ACTION TO PROPERTY RIGHTS (1.10); FURTHER DRAFTING REGARDING SAME (.60). J. GRAHAM MATHERNE 1.70 hours at 270.00 per hour.	459.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1023553

Nov 7, 2016
PAGE 3

10/07/16 LENGTHY REPORT E-MAIL TO R. MOORE AND E. SINOR
AS TO WATER SUPPLY LINE ASPECT OF POTENTIAL
ACTION (1.00); TELEPHONE CONFERENCE WITH
CUMBERLAND COUNTY ROADS DEPARTMENT REGARDING
MALLINAX ROAD (.30); E-MAIL TO R. MOORE & E.
SINOR REGARDING SAME (.10).
J. GRAHAM MATHERNE 1.40 hours at 270.00 per hour. 378.00

10/10/16 TELEPHONE CONFERENCE WITH J. SWALLOWS (ROD)
REGARDING ADDITIONAL DEEDS AND RECORDINGS AS TO
SAME (.30); REVIEW OF SAME (.20).
J. GRAHAM MATHERNE .50 hours at 270.00 per hour. 135.00

10/11/16 FURTHER REVIEW OF WATER TANK PROPERTY ISSUES
(.40); DRAFTING OF PORTION OF POTENTIAL ACTION
REGARDING SAME (.60).
J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour. 270.00

10/12/16 OUTLINING AND DRAFTING PETITION SECTION
REGARDING WATER TANK AND EASEMENT POSITION
(.80); REVIEW ISSUES REGARDING NEED FOR CCN
(.20).
J. GRAHAM MATHERNE 1.00 hours at 270.00 per hour. 270.00

10/17/16 REVIEW AND OUTLINING OF FACTS AND ISSUES
REGARDING EASEMENTS AND RELATED MATTERS.
J. GRAHAM MATHERNE .80 hours at 270.00 per hour. 216.00

10/19/16 REVIEW MOY TOY IRREVOCABLE LICENSE AS TO
APPLICABILITY TO WATER SUPPLY LINE (.30);
FURTHER DRAFTING OF WATER SUPPLY LINE SECTION
AND WATER TANK SECTION OF POTENTIAL PETITION
(3.90); E-MAILS WITH R. MOORE AND SINOR
REGARDING INQUIRY AS TO DEMOLITION OF WATER
TOWER (.30); REVIEW OF WATER TOWER QUITCLAIM
DEED REGARDING RESTRICTIONS (.30).
J. GRAHAM MATHERNE 4.80 hours at 270.00 per hour. 1296.00

10/20/16 E-MAILS WITH SINOR REGARDING STATUS ISSUES
(.30); EXTENSIVE REVIEW OF ORIGINAL PLATS FOR
RENEGADE MOUNTAIN DEVELOPMENT AS TO RESERVED
EASEMENTS ON PLATTED LOTS (1.90);
CROSS-REFERENCE ORIGINAL PLATS TO CURRENT TAX
MAP TO SHOW GRAPHICALLY THE AREA COVERED BY
ORIGINAL PLATS (2.10); CONTINUED OUTLINING OF
EASEMENT SECTION OF POTENTIAL PETITION (.50);
COMPARISON OF TRA SETTLEMENT AGREEMENT WITH
LHWS BILL OF SALE AND MOY TOY DEED AS TO WATER
TOWER PROPERTY AND AS TO "IRREVOCABLE LICENSE."
(.40).
J. GRAHAM MATHERNE 5.20 hours at 270.00 per hour. 1404.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1023553

-)/21/16 TELEPHONE CONFERENCES AND E-MAILS WITH E. SINOR REGARDING UPDATE AS TO HEARING DATE ON SHOW CAUSE IN RECEIVERSHIP ACTION AND RELATED MATTERS (.30); TELEPHONE CONFERENCES WITH CUMBERLAND COUNTY REGISTER OF DEEDS REGARDING VARIOUS ORIGINAL PLAT MATS AND CROSS-REFERENCE ISSUES REGARDING RECORDING OF SAME (.30); REVIEW MATERIAL FROM REGISTER OF DEEDS OFFICE (.20); COMPLETION OF "ROUGH SERVICE AREA" MAP BASED ON TAX ASSESSOR'S PLATTED MAP (.40); FURTHER DRAFTING OF PORTIONS OF POTENTIAL PETITION (2.50).
J. GRAHAM MATHERNE 3.70 hours at 270.00 per hour. 999.00
-)/24/16 CONTINUED DRAFTING OF POTENTIAL PETITION (1.70); TELEPHONE CONFERENCES WITH E. SINOR REGARDING SAME AND REGARDING FURTHER REPORTING TO RECEIVERSHIP COURT (.20); TELEPHONE CONFERENCES WITH R. MOORE REGARDING STATUS ISSUES AND REGARDING UPCOMING HEARING IN RECEIVERSHIP MATTER AND TIMING OF POTENTIAL FILING OF PETITION (.30); FURTHER DRAFTING AND EDITING TO POTENTIAL PETITION (1.50).
J. GRAHAM MATHERNE 3.70 hours at 270.00 per hour. 999.00
-)/25/16 ALL MATTERS REGARDING DRAFTING AND REVISING OF POTENTIAL CONDEMNATION ACTION (2.5); CROSS CHECK AS TO FILE MATERIAL REGARDING SAME (.60); E-MAILS AND TELEPHONE CONFERENCES WITH SINOR REGARDING SAME AND COUD AND KEMMER EASEMENT ISSUES (.40).
J. GRAHAM MATHERNE 3.50 hours at 270.00 per hour. 945.00
-)/26/16 E-MAILS WITH SINOR REGARDING KEMMER PROPERTY (.20); DRAFT AND REVISE COUD EASEMENT (1.00); E-MAILS WITH MOORE AND SINOR REGARDING SAME (.20); E-MAILS WITH DART KENDALL REGARDING SAME (.40); DRAFTING, REVISING AND EDITING OF DRAFT CONDEMNATION PETITION (3.40); START COMPILING EXHIBITS REGARDING SAME (.40); E-MAILS TO R. MOORE AND E. SINOR REGARDING DRAFT PETITION (.20).
J. GRAHAM MATHERNE 4.80 hours at 270.00 per hour. 1296.00
-)/27/16 DRAFTING AND REVISIONS TO EASEMENTS FOR CRAB ORCHARD UTILITY DISTRICT AND KEMMERS (1.30); E-MAILS WITH D. KENDALL REGARDING SAME (.40); TELEPHONE CONFERENCES AND E-MAILS WITH E. SINOR REGARDING SAME (.70); FURTHER REVIEW AND WORK ON CONDEMNATION PETITION (.50).
J. GRAHAM MATHERNE 2.90 hours at 270.00 per hour. 783.00

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
 MATTER NUMBER: 008264.000036
 INVOICE NO.: 1023553

Nov 7, 2016
 PAGE 5

10/28/16 OUTLINING EDITS TO DRAFT PETITION (.90); FILE
 REVIEW AND ORGANIZATION REGARDING FACTS IN
 PETITION AND EXHIBITS TO PETITION (1.10).
 J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

10/31/16 CROSS-REFERENCING EXHIBITS TO DRAFT PETITION
 (1.0); REVIEW OF FILE RE: FURTHER EXHIBITS AND
 FACTUAL ISSUES IN PETITION (.80); REVISIONS OF
 KEMMER EASEMENT (.10); TELEPHONE CONFERENCE
 WITH AND E-MAIL WITH SINOR RE: SAME (.20);
 REVISION AND FURTHER DRAFTING OF PETITION
 (2.30).
 J. GRAHAM MATHERNE 4.40 hours at 270.00 per hour. 1188.00

TOTAL SERVICES	51.90	\$14,013.00
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OUTSIDE COPY CHARGES	161.25
TRAVEL EXPENSES	124.20

OTHER CHARGES AND DISBURSEMENTS	\$285.45
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TOTAL THIS INVOICE	\$14,298.45
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PREVIOUSLY BILLED AND OUTSTANDING	\$7,263.00
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TOTAL AMOUNT DUE	\$21,561.45
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-----TIME AND FEE SUMMARY-----			
-----TIMEKEEPER-----	RATE	HOURS	FEES
J MATHERNE PARTNER	270.00	51.90	14013.00

RMI EXP RECOVERABLE LHWD
10/1/16 Through 10/31/16

Category Description	LHWD-289 LAU...	OVERALL TOTAL
5100 FEES RMI		
5610-CONTRACT LABOR RMI	-1,371.50	-1,371.50
5690-RMI OH EXPENSE	-201.60	-201.60
TOTAL 5100 FEES RMI	-1,573.10	-1,573.10
5150 FEES LEGAL		
5400-LEGAL FEES	-16,575.85	-16,575.85
TOTAL 5150 FEES LEGAL	-16,575.85	-16,575.85
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-6.30	-6.30
6210-POSTAGE	-3.18	-3.18
6215-COURIER & OVERNIGHT	-55.02	-55.02
6222-TELEPHONE LONG DISTANCE	-0.80	-0.80
TOTAL 5300 EXPENSES	-100.76	-100.76
OVERALL TOTAL	-18,249.71	-18,249.71

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: 12-5, 2016 at 1:05 PM AM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval and Authorization of Payment of Fees and Expenses, and Interim Taxation of Costs.
2. I am the General Counsel for the Tennessee Regulatory Authority in this matter. Pursuant to Tennessee law, the Tennessee Regulatory Authority took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.
3. Either I, or my staff at my direction, have reviewed the invoices for fees and expenses contained in this filing for the services performed by the Receiver for the period of October 1, 2016 through October 31, 2016 that are contained in this filing.

EXHIBIT

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

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

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

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

[intentionally blank]

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

FURTHER THE AFFIANT SAITH NOT.

Kelly Cashman Grams

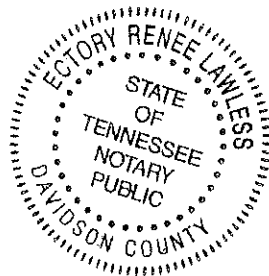
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this
1st day of December, 2016.

Renee Lawless

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

FILED
Date: 12-5, 2016 at 1:05 ^{AM} PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett

AFFIDAVIT OF ROBERT E. MOORE, JR.

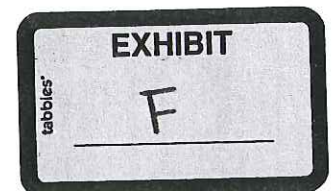
STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

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

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



expenses incurred for the period of time between October 1, 2016 and October 31, 2016 that are contained in the Receiver's motion.

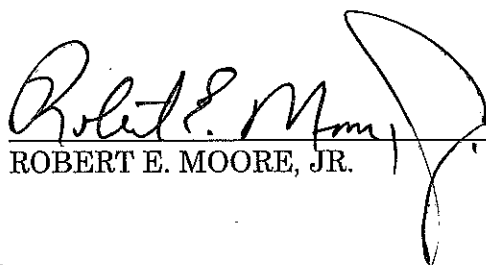
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

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

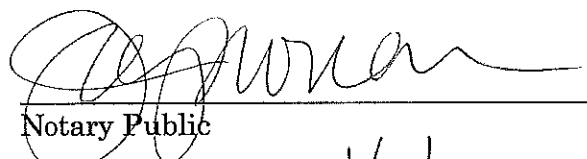
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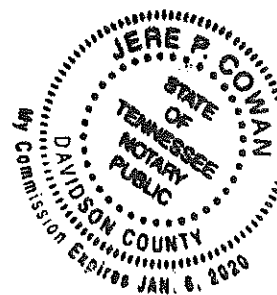
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the fees and expense for J. Graham Matherne, Esq. Accordingly, and pursuant to the Court's Amended Order Appointing Receiver, it is requested that the Court approve payment to the Receiver out of the assets of the Laurel Hills Water System in Receivership in the amount of \$3951.26 (i.e., the amount of all fees and expenses set forth in the Receiver's Motion, save fees and expenses attributable to Mr. Matherne), and that the Court order an interim taxation of costs to the Tennessee Regulatory Authority in the amount of \$14,298.45 (i.e., the amount of fees and expenses attributable to Mr. Matherne set forth in the Receiver's Motion).

FURTHER THE AFFIANT SAITH NOT.


ROBERT E. MOORE, JR.

Sworn to and subscribed before me on this
30th day of November, 2016.


Notary Public
Commission Expires: 1/6/2020



RECEIVED
12-5-2016

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 December, 2016, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for October of 2016, and approve payment to the Receiver of a portion of such fees and expenses out of receivership estate assets, and tax costs on an interim basis to the Authority for a portion of such fees and expenses.

The Receiver's motion being well taken, and no opposition being filed with this Honorable Court within ten (10) calendar days of the filing date of the Receiver's motion, it is **ORDERED, ADJUDGED, and DECREED** that the Receiver's fees and expenses are hereby **APPROVED** in the amount of \$18,249.71.

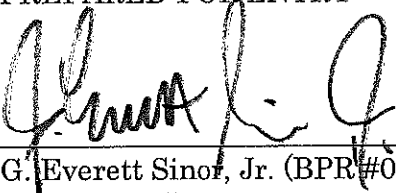
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$3951.26 from the assets of the Laurel Hills Water System in Receivership is hereby **AUTHORIZED**; and,
- (2) **COSTS ARE TAXED** on an interim basis to the Plaintiff, the Tennessee Regulatory Authority, in the amount of \$14,298.45.

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:

James R. Layman, Esq.
Staff Attorney
Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

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

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

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

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

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

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

via the United States Mails, postage prepaid, this ____ day of _____, 2016.