

G. EVERETT SINOR, JR.
Attorney at Law

February 2, 2017

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

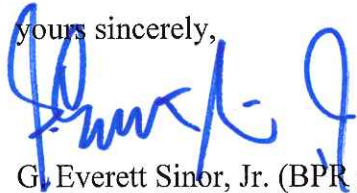
Dear Ms. Tollett:

Please find enclosed herewith the following:

1. The Receiver's Twelfth 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

ec: 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.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

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

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

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

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

Implementation of Receivership Plan

3. The Receiver filed its Receivership Plan Implementation Progress Report with this Honorable Court on August 16, 2016, and reference is made to that progress report, as well as the Receiver's Eighth through Eleventh 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.

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

² See the Receiver's second, third, fourth, fifth, sixth, seventh, eighth, ninth, tenth and eleventh reports, filed with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016, June 27, 2016, August 4, 2016, August 26, 2016, October 3, 2016, November 10, 2016, December 5, 2016, and January 13, 2017, respectively.

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.

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.

6. This Honorable Court ordered the parties, including Moy Toy, to participate in a global mediation session in attempt to resolve all issues of dispute. Judge John A. Turnbull has been selected by the parties to conduct this global mediation session, which is currently scheduled to take place at the Cumberland County Justice Center on February 21, 2017.

Operations and Other Activities of the Receiver

7. In January of 2017, 90 of the 131 customers of the LHWS have paid their water bill. Of the 41 non-paying customers, 24 are in the Cumberland Pointe condominium units, and 17 are located elsewhere on Renegade Mountain. However, as to non-Cumberland Pointe condominium unit owners, the number of customers who have not paid their water bill for two (2) or more months has decreased in the past month from eleven (11) to nine (9).

8. The Receiver intends to institute a process to cut-off water service to customers who fail to timely pay their water bill. The Receiver intends to send a first notice

of delinquency to chronic non-paying LHWS customers with the March 2017 billing statements (giving 30 days to pay the delinquent bill), and, if necessary, send a second and final notice of delinquency with the April 2017 billing statements (giving 15 days to pay the delinquent bill). Water service cut-offs, if any, will conform with applicable law, specifically Tenn. Comp. R. & Regs., tit. Tennessee Regulatory Authority, ch. 1220-4-3.

9. 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. The Receiver continues to greatly appreciate the work performed by Mr. Williams for the LHWS.

10. There are two (2) general areas where roads or driveways have been cut in order to make necessary repairs to LHWS pipes—(a) in and around the Loud property bordering Renegade Mountain Parkway; and (b) the drive off of Renegade Mountain Parkway leading up to the Laurel Hills Condominiums. These areas will need to be repaired in the early spring once the weather permits.

Financial Information

11. As of January 24, 2017, there was an accounts receivable past due balance of \$25,016.24.³ A copy of the Accounts Receivable Aging Summary as of that date is attached hereto as Exhibit A and is incorporated herein by reference.

12. On a cash basis, LHWS had a net loss in December 2016 of \$13,118.06.⁴ See Exhibit B, attached hereto and incorporated herein by reference. As of December 31, 2016,

³ Of this amount, \$5001.56 is less than a month past due, and \$20,014.68 is more than a month past due. This past due amount also includes balances owed prior to the institution of the new monthly rate of \$114.24. See Exhibit A. In its next report (and subsequent reports) to the Court, the Receiver intends to only show past due balances occurring on or after July 1, 2016.

⁴ This is a bit misleading, in that there were significant accounts payable booked at November 30, 2016 (most significantly the Crab Orchard Utility District wholesale water bill) that were paid in December of 2016.

LHWS had a balance of \$3850.80 in its main operating account. See Collective Exhibit C, attached hereto and incorporated herein by reference. The LHWS was able to meet current obligations in December of 2016.⁵

Cash Flow Projection – Anticipated Problems

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

14. Fees and expenses for Receivership Management, Inc. and for Mr. Sinor in December of 2016 were lower than typical amounts. *See* the section entitled Fees and Expenses of Receiver, *infra*. Fees and expenses for Receivership Management, Inc. and for Mr. Sinor in January of 2017, though not finalized, are also anticipated to be lower than typical amounts. The Receiver continues to anticipate, however, that the LHWS will run out of money once those fees and expenses resume to their typical levels.⁶ When this occurs, it will likely be necessary for further interim taxation of costs to take place to make up the difference.

Fees and Expenses of Receiver

⁵ 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 significant additional amounts taxed to the Authority to reflect Mr. Matherne's fees and expenses.

⁶ 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. The Receiver anticipates that Receivership Management, Inc. and Mr. Sinor's fees and expenses in February of 2017 will rise to their typical levels, given the pending global mediation session scheduled for February 21, 2017 referenced in ¶ 6, *supra*.

15. Pursuant to the Amended Order Appointing Receiver, compensation for the Receiver is payable from funds or assets of the LHWS, if such funds are available. If the funds or assets of the LHWS are not available to pay Receivership fees and costs, then those fees and costs are to be taxed as interim court costs to be paid by the Authority. The Receiver is to submit invoices to the Authority on a monthly basis for approval. These invoices are reviewed and paid after approval of the Authority and the Court, through an interim taxation of costs, if necessary.⁷

16. 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, Ms. Anna Hunter, Ms. Jeanne Bryant, and Ms. Jere Cowan, performed work for this Receivership for the period of December 1, 2016 through December 31, 2016 in the amount of \$1401.25.⁸ 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 December 1, 2016 through December 31, 2016 in the amount of \$2455.96. 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 December 1, 2016 through December 31, 2016 in the amount of \$10,146.31.

17. 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

⁷ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

⁸ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of December 1, 2016 through December 31, 2016, which total \$247.40.

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.

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

- a. Invoices for Robert E. Moore, Jr. and others at the Receiver for December of 2016: \$1401.25; and,
- b. Invoice for Mr. Sinor working under Mr. Moore for December of 2016: \$2455.96; and,
- c. Invoice for Mr. Matherne working under Mr. Moore for December of 2016: \$10,146.31.

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 for the Court's consideration if no opposition is filed.

[intentionally blank]

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 \$14,003.52, 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 \$3857.21 (constituting all fees and expenses save Mr. Matherne's); and (b) tax costs to the Authority on an interim basis in the amount of \$10,146.31 (constituting the amount of Mr. Matherne's fees and expenses).

DATED: February 2, 2017.

Respectfully Submitted,

Laurel Hills Water System in Receivership-

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

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

by permission granted
on 1/27/17
J. Moore

Certificate of Service

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

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

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

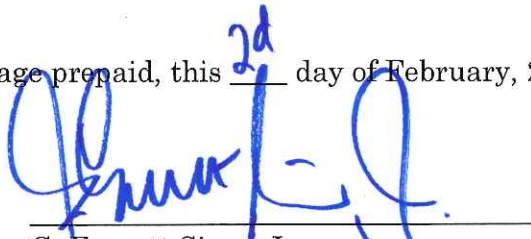
Scott D. Hall, Esq.
Counsel for Moy Toy, LLC
105 Bruce Street
Sevierville, Tennessee 37862

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 2^d day of February, 2017.



G. Everett Sinor, Jr.

1:51 PM

01/24/17

Laurel Hills Water System In Receivership A/R Aging Summary As of January 24, 2017

	Current	1 - 30	31 - 60	61 - 90	> 90	TOTAL
BENSON, CYNTHIA L	0.00	114.24	114.24	114.24	0.00	342.72
BOWLES, MELVIN & MARY ANNE	0.00	114.24	114.24	114.24	381.96	724.68
BRASSELL, CRYSTAL	0.00	114.24	0.00	0.00	0.00	114.24
CECCHETT, DON & DIANNE	0.00	114.24	0.00	0.00	0.00	114.24
CHAMBERS, BARRY	0.00	114.24	0.00	0.00	0.00	114.24
CPCA (84)	0.00	2,741.76	2,627.52	2,399.04	10,281.60	18,049.92
ELLIS, ALVIN	0.00	114.24	0.00	0.00	0.00	114.24
GRIGSBY, GLEN E.	0.00	114.24	0.00	0.00	0.00	114.24
HEIRS, LUKE & ANNA DUNN	0.00	114.24	114.24	114.24	523.16	865.88
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	228.48	571.20
Laurel Hills Condo Assoc (#5101)	0.00	114.24	114.24	114.24	0.00	342.72
Laurel Hills Condo Assoc (#5102)	0.00	114.24	114.24	114.24	0.00	342.72
Laurel Hills Condo Assoc (#5103)	0.00	114.24	114.24	114.24	0.00	342.72
MCQUEEN, DARRELL E	0.00	114.24	114.24	0.00	0.00	228.48
MILLER, DAVID	0.00	0.00	0.00	114.24	1,218.26	1,332.50
MURPHY, JEFF	0.00	114.24	0.00	0.00	0.00	114.24
NEALE, MIKE	0.00	114.24	0.00	0.00	0.00	114.24
PETERS, JOHN (1)	0.00	89.24	0.00	0.00	0.00	89.24
RIFNER, DAVE	0.00	114.24	114.24	114.24	0.00	342.72
ROBINSON, CARL	0.00	114.24	0.00	0.00	0.00	114.24
SANDLIN, DONALD & BRENDA	0.00	114.24	0.00	0.00	0.00	114.24
SCHWARTZ, ROBERT	0.00	0.00	0.00	0.00	298.30	298.30
TOTAL	0.00	5,001.56	3,655.72	3,427.20	12,931.76	25,016.24



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

FOR THE PERIOD

RECEIPTS	10/26/2015	12/1/2016	10/26/2015
	11/30/2016	12/31/2016	12/31/2016
1000-INTEREST INCOME	-	-	-
1010-REGIONS 8611	-	-	-
4910-WATER BILL RECEIPTS	97,145.02	10,967.04	108,112.06
TOTAL REVENUE	97,145.02	10,967.04	108,112.06
DISBURSEMENTS			
FEEES			
5695-ACCOUNTING FEES	2,300.00	900.00	3,200.00
5400-LEGAL FEES	49.00	-	49.00
5610-CONTRACT LABOR	2,345.56	-	2,345.56
TOTAL FEES	4,694.56	900.00	5,594.56
OTHER EXPENSES:			
5697-OTHER FEES	3,100.00	-	3,100.00
5930-TAXES	1,692.26	-	1,692.26
6060-RENT	-	-	-
6190-EQUIPMENT MAINTENANCE	349.78	-	349.78
6215-COPIES POSTAGE & SHIPPING	130.00	-	130.00
6220-TELEPHONE & INTERNET	-	-	-
6230-OFFICE SUPPLIES	45.58	-	45.58
6250-PRINTING	-	-	-
6260-STORAGE	-	-	-
6270-MOVING EXPENSE	-	-	-
6290-UTILITIES	33,126.65	21,915.01	55,041.66
6299-MISC EXPENSE	607.28	-	607.28
6325-BANK CHARGES	12.00	-	12.00
6330-COURT COSTS	-	-	-
6340-INSURANCE	12,685.88	1,270.09	13,955.97
6350-TRAVEL	-	-	-
TOTAL OTHER EXPENSES	51,749.43	23,185.10	74,934.53
TOTAL EXPENSES	56,443.99	24,085.10	80,529.09
NET RECEIPTS LESS DISBURSEMENTS	40,701.03	(13,118.06)	27,582.97
SCHEDULE OF CHANGE IN NET ASSETS			
FUND BALANCE RECEIVED	100.00	-	100.00
NET RECEIPTS LESS DISBURSEMENTS	40,701.03	(13,118.06)	27,582.97
DISTRIBUTIONS PAID	-	-	-
CLAIMS PAYABLE	-	-	-
NET ASSETS	40,801.03	-	27,682.97
1/19/2017 13:21			
TOTAL ASSETS	31,330.19	-	3,850.80
TOTAL LIABILITIES	9,470.84	-	23,832.17
NET ASSETS	40,801.03	-	27,682.97

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 RECORDE



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

12/31/2016

OPERATING BANK ACCOUNT

	<u>BALANCE PER BANK STMT</u>	<u>BALANCE PER GENERAL LEDGER</u>
END OF MONTH AC 232618611	27,047.90	3,850.80
END OF MONTH AC 232618638	(12.00)	
OUTSTANDING CHECKS	(23,185.10)	

<u>3,850.80</u>	<u>3,850.80</u>
-----------------	-----------------

4-Jan-17
09:00 AM

-

OUTSTANDING CHECKS

1066	614.45
1067	1,270.09
1068	21,300.56

oct fees

23,185.10

2015 TAX PYMT
2016 TAX PYMT

1,624.00
1,230.00





Regions Bank
 Brentwood
 329 Franklin RD
 Brentwood, TN 37027

LAUREL HILLS CONDO POA IN RECEIVERSHIP
 783 OLD HICKORY BLVD STE 255
 BRENTWOOD TN 37027-4508

ACCOUNT # 0232618611

Cycle 053
 Enclosures 26
 Page 0
 1 of 2

LIFEGREEN BUSINESS CHECKING
 December 1, 2016 through December 30, 2016

SUMMARY

Beginning Balance	\$33,678.86		Minimum Balance	\$17,323
Deposits & Credits	\$10,967.04	+	Average Balance	\$27,709
Withdrawals	\$0.00	-		
Fees	\$0.00	-		
Automatic Transfers	\$0.00	+		
Checks	\$17,598.00	-		
Ending Balance	\$27,047.90			

DEPOSITS & CREDITS

12/07	Deposit - Thank You	342.72
12/16	Deposit - Thank You	2,856.00
12/21	Deposit - Thank You	7,425.60
12/29	Deposit - Thank You	342.72
Total Deposits & Credits		\$10,967.04

CHECKS

<u>Date</u>	<u>Check No.</u>	<u>Amount</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount</u>
12/12	1060	500.00	12/14	1063	14,361.33
12/06	1061	1,270.09	12/28	1064	900.00
12/01	1062	566.58			
Total Checks					\$17,598.00

* 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>
12/01	33,112.28	12/12	31,684.91	12/21	27,605.18
12/06	31,842.19	12/14	17,323.58	12/28	26,705.18
12/07	32,184.91	12/16	20,179.58	12/29	27,047.90

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
		2 of 2

**THE REGIONS DEPOSIT AGREEMENT IS REVISED
12-1-16 REGARDING EFFECTIVE SIGNATURES;
AUTHORIZED SIGNERS; MULTI-PARTY
ACCOUNTS; AUTHORIZED REPRESENTATIVES FOR
BUSINESS/ORGANIZATIONAL ACCOUNTS; STATE
DISCLOSURES; ACCOUNT CLOSING; AND
BILLING ERRORS OR QUESTIONS FOR
ELECTRONIC TRANSFERS. FOR A COPY OF THE
CHANGES, PLEASE VISIT ANY BRANCH
OR GO TO REGIONS.COM/AGREEMENTS.**

For all your banking needs, please call 1-800-REGIONS (734-4667)
or visit us on the Internet at www.regions.com (TTY/TDD 1-800-374-6791).

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 PRAUTHORIZED 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

December 2016 Fees	\$178.80
December 2016 Overhead Expense	\$16.80

Receivership Management, Inc.

December 2016 Fees	\$975.05
December 2016 Overhead Expense	\$182.70
December 2016 Expenses	\$47.90

Everett Sinor

December 2016 Fees & Expenses	<u>\$2,455.96</u>
-------------------------------	-------------------

Proposed Payment out of Receivership Estate	\$3,857.21
--	-------------------

Graham Matherne

December 2016 Fees & Expenses	<u>\$10,146.31</u>
-------------------------------	--------------------

Proposed Interim Taxation of Costs	\$10,146.31
---	--------------------



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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		December 2016			
12/1/2016	Jeanne Barnes Bryant	EMAIL RE SEPTEMBER REPORT, QUESTION RE NEXT REPORT AND MEDIATION, EMAIL FROM COUNSEL RE ORDERS	0.2	\$163.00	\$32.60
12/2/2016	Jeanne Barnes Bryant	INFORMATION FROM COUNSEL RE FILING	0.1	\$163.00	\$16.30
12/7/2016	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE ORDER, QUESTION RE CHECKS	0.2	\$163.00	\$32.60
12/15/2016	Jeanne Barnes Bryant	QUESTIONS RE MEDIATION	0.1	\$163.00	\$16.30
12/20/2016	Jeanne Barnes Bryant	EMAILS RE TRA CHECK, REVIEW AND SIGN CHECK FOR COUNSEL FEES, DISCUSSION RE INCREASE FOR ENGINEER WITH CODY SMITH	0.2	\$163.00	\$32.60
12/21/2016	Jeanne Barnes Bryant	EMAIL FROM COUNSEL RE ENGINEER AND OUTSTANDING ISSUES	0.1	\$163.00	\$16.30
12/22/2016	Jeanne Barnes Bryant	EMAIL RE REPORT, QUESTION FROM COUNSEL RE ORDER	0.1	\$163.00	\$16.30
12/26/2016	Jeanne Barnes Bryant	EMAIL FROM ROB MOORE RE REPORT	0.1	\$163.00	\$16.30
12/29/2016	Jeanne Barnes Bryant	QUESTION RE CHECK	0.1	\$163.00	\$16.30
Total					\$195.60

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

Invoice for Professional Services

LAUREL HILLS WATER DISTRICT		December 2016			
12/1/2016	Anna M. Hunter	UPDATE REGISTER AND RECONCILE BANK ACCOUNT. PHONE CALL WITH T. STEPHNS REGARDING DEPOSIT DETAILS. RECORD NOVEMBER FEES.	0.6	\$50.00	\$30.00
12/1/2016	Jere P. Cowan	EMAILS WITH E. SINOR RE: TRA AND R. MOORE AFFIDAVITS; TRAVEL TO TRA OFFICE RE: OBTAINING EXECUTED GRAMS AFFIDAVIT; CONFERENCE WITH E. SINOR RE: SAME	1.6	\$50.00	\$80.00
12/2/2016	Cody Smith	POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. UPDATE NET ASSETS FROM WATER OPERATION. DISCUSSION OVER CASH FLOW PROJECTIONS.	0.6	\$123.00	\$73.80
12/2/2016	Jere P. Cowan	EMAILS WITH SINOR RE: EXECUTED AFFIDAVIT	0.2	\$50.00	\$10.00
12/6/2016	Cody Smith	UPDATE REGISTERS AND RECONCILE REVENUE AND EXPENSE ACCOUNT THROUGH CURRENT PERIOD. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION IN PREPARATION FOR YE.	0.3	\$123.00	\$36.90
12/7/2016	Cody Smith	UPDATE QUICKEN REGISTER AND TB THROUGH 11/30/16. PREPARE FOR YE FILINGS.	0.3	\$123.00	\$36.90
12/8/2016	Cody Smith	PREPARING EXHIBITS FOR COURT REPORTS. POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION.	0.3	\$123.00	\$36.90
12/8/2016	Robert E. Moore, Jr.	EMAIL FROM G.MATHERNE RE: CONFERENCE CALL .10; CONFERENCE CALL WITH G.MATHERNE AND E.SINOR RE: MEDIATION ISSUES, EASEMENT ISSUES, EASEMENT PARTIES 1.2	1.3	\$153.00	\$198.90
12/12/2016	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.2	\$123.00	\$24.60

LAUREL HILLS WATER DISTRICT

December 2016

Date	Name	Description	Hours	Rate	Total
12/13/2016	Cody Smith	POST DEPOSIT AND FEE AND EXP ACCRUALS FROM WATER OPERATION. REVIEW A/R FROM TERRY STEPHENS OFFICE.	0.6	\$123.00	\$73.80
12/13/2016	Robert E. Moore, Jr.	FORWARD EMAIL TO E.SINOR FROM D.KENDALL RE: FREEZE PROTECTIONS, INVOICE APPROVALS EMAILED TO C.SMITH. 10; UPDATE CALL ON MEDIATION AND EASEMENTS WITH G.MATHERNE AND E.SINOR. 5	0.6	\$153.00	\$91.80
12/14/2016	Robert E. Moore, Jr.	RESPOND TO D.KENDALL RE: INFORMATION ON LEAKS. 10	0.1	\$153.00	\$15.30
12/15/2016	Robert E. Moore, Jr.	EMAILS TO AND FROM E.SINOR RE: MEDIATION CONFLICT. 10; CALL WITH E.SINOR RE: SAME AND PENDING SCHEDULE FOR MEDIATION. 25	0.35	\$153.00	\$53.55
12/16/2016	Anna M. Hunter	RECORD DEPOSIT FROM 12/7.	0.1	\$50.00	\$5.00
12/16/2016	Jere P. Cowan	EMAIL FROM E. SINOR RE: AFFIDAVITS FOR STATUS REPORTING; CONFERENCE WITH R. MOORE RE: EXECUTION OF SAME	0.3	\$50.00	\$15.00
12/16/2016	Jere P. Cowan	RECEIPT FEE PAYMENT; EMAIL TO R. MOORE RE: SAME; CONFERENCE WITH C. SMITH RE: PAYMENT OF COSTS; PREPARE SAME; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNT	0.8	\$50.00	\$40.00
12/16/2016	Jere P. Cowan	EMAIL FROM E. SINOR SENDING R MOORE AFFIDAVIT FOR STATUS REPORTING	0.2	\$50.00	\$10.00
12/19/2016	Anna M. Hunter	PROVIDE NET ASSETS REPORT TO E. SINOR. PHONE CALL WITH E. SINOR REGARDING NET ASSETS REPORT. PULL PRIOR MONTH CHECKS FOR VERIFICATION OF MONTHLY EXPENSES.	1	\$50.00	\$50.00
12/19/2016	Jere P. Cowan	RECEIPT AND PROCESS EXPENSES FROM C. SMITH; FORWARD TO J. BRYANT FOR APPROVAL	0.5	\$50.00	\$25.00
12/19/2016	Robert E. Moore, Jr.	RESPOND TO EMAIL FROM E.SINOR RE: MEDIATION. 10	0.1	\$153.00	\$15.30
12/20/2016	Cody Smith	DISCUSSION ON COMPANY STATUS UPDATE FOR CURRENT PERIOD.	0.2	\$123.00	\$24.60
12/21/2016	Anna M. Hunter	PROVIDE TIMESHEETS FOR NOVEMBER 2016 RMI BILLING.	0.2	\$50.00	\$10.00
12/21/2016	Jere P. Cowan	CONFERENCE WITH A. HUNTER RE: EXPENSES; PREPARATION OF FINANCIAL EXHIBITS FOR STATUS REPORT; EMAIL WITH E. SINOR RE: MOORE AFFIDAVIT AND EXPENSES	0.5	\$50.00	\$25.00
12/21/2016	Robert E. Moore, Jr.	UPDATES FROM E.SINOR RE: MEDIATION; REPLACEMENT ENGINEER. 10	0.1	\$153.00	\$15.30

LAUREL HILLS WATER DISTRICT

December 2016

Date	Name	Description	Hours	Rate	Total
12/22/2016	Anna M. Hunter	RECORD DEPOSIT FROM 12/21	0.2	\$50.00	\$10.00
12/22/2016	Cody Smith	DISCUSSION RE UPDATED NET ASSETS AND CASH FLOW STATEMENTS.	0.4	\$123.00	\$49.20
12/22/2016	Robert E. Moore, Jr.	REVIEW AND APPROVE MICROBAC QUARTERLY BILLING .10	0.1	\$153.00	\$15.30
12/26/2016	Robert E. Moore, Jr.	REVIEW AND APPROVE 11TH REPORT .10	0.1	\$153.00	\$15.30
12/28/2016	Jere P. Cowan	EMAILS WITH E. SINOR RE: R. MOORE AFFIDAVIT; FORWARD SAME;	0.3	\$50.00	\$15.00
12/28/2016	Jere P. Cowan	EMAIL WITH R. MOORE RE: MICROBAC STATEMENT RECEIVED	0.2	\$50.00	\$10.00
12/29/2016	Jere P. Cowan	RECEIPT INVOICES FOR PROCESSING AND PAYMENT; PREPARE AND FORWARD PAYMENT FOR SAME	0.6	\$50.00	\$30.00
12/29/2016	Robert E. Moore, Jr.	RESPOND TO QUESTIONS RE: MICROBAC REPORT .10	0.1	\$153.00	\$15.30

Total

\$1,157.75

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

January 3, 2017

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

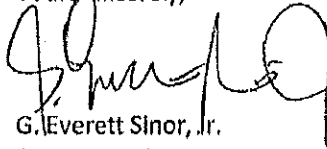
RE: December 2016 Billings -- RMI/Laurel Hills Water System in Receivership

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>
12/1/2016	T.C. w G Cashion office to set up mediation; K Cashman-Grams email re affidavit; T.C. w G Cashion re availability for mediation; G. Matherne email on service; call to Sue Tollett's office w Connie; T.C. w G Williams; email to parties and K Cashman-Grams on mediation; review of deposit slip	1.0		
12/2/2016	Email from C Turner w S Tollett's office; email to J Cowan on TRA affidavit; 10th report work; V.M. for R Moore re engineer (2)	0.9		
12/5/2016	T.C. w Tracy Shaw re mediation; T.C. w J Blankenship re mediation; T.C. w M Bryant re operation of LHWS	0.2		
12/7/2016	Discussion w R Moore re mediation dispute & other LHWS matters; response to Connie w Sue Tollett's office re order; review of order; VMs to K Cashman Grams & J Layman re Hall email; T.C. w K Cashman-Grams, J Layman & A Conklin re LHWS; emails to C Smith on 9th report; VM for G Matherne	0.7		
12/8/2016	Discussion w R Moore re LHWS issues; VMs for G Cashion re mediation; T.C. w G Cashion re mediation & dispute on parameters; T.C. (2) w G Matherne & R Moore re LHWS issues	2.0		
12/12/2016	Email to all LHWS parties re mediation; review of S Hall email; numerous emails re mediation; transmission of pertinent docs to G Cashion; T.C. to M Bryant re: engineer work; G. Cashion email	0.8		
12/13/2016	emails re mediation; T.C. w A Conklin & G Matherne prior to conf. call; review of Lansford & Stephens emails on deposit and bills; mediation conf. call w interested parties organized by G Cashion; T.C. (2) w R Moore & G Matherne re LHWS issues	2.6		
12/14/2016	email to R Moore & G Williams re weather and draining of system; email to Lansford & Stephens re: outstanding monies	0.1		
12/15/2016	S Hall email re mediation; email to parties re same; S Hall email; Call to J Layman re mediation schedule; T.C. w A Conklin & K Cashman-Grams re mediation and LHWS matters; A. Conklin email re mediation; Email to R Moore & G Matherne re mediation; email to group; T.C. w R Moore re LHWS matters	0.8		
12/16/2016	Call to R York re Judge Turnbull potential mediator; email to Judge Turnbull; draft of M Jacobs operations agreement; affidavit of R Moore for 11th report	1.7		

10/19/2016	G Williams voice mail re draining of system; Anna Hunter email w 11th report information; email to C Smith re same; email to group re mediation; email to M Bryant w proposed agreement; email to Heather @ Lansford & Stephens requesting A/R report; A Conklin email re mediation; T.C. w C Smith & A Hunter re 11th report information and accounts payable; various mediations emails; T.C. w R Moore re LHWS matters	0.7		
12/20/2016	Emails from G Matherne & J Bryant re payment of fees; T.C. w M Bryant re operators agreement; modifications to operators agreement; email to M Bryant w operators agreement; emails to 3 potential mediators; email to group checking on availability for mediation; email from G Matherne re Eagles' Nest easement; T. Shaw email re mediation	0.6		
12/21/2016	Email from R Scwherer re mediation dates; T.C. w J Layman re mediation dates; T.C. w G Williams re potential operator; Call to COUD (E Bolin) re operator to leave message; 11th report preparation and ancillary docs; review of A Conklin email; email to R Moore & return email on mediation date; email to RMI re: operational LHWS issues; T.C. w Connie at the Cumberland County Clerk and Master's office; T.C. w E Bolin re operation of LHWS; R Schwerer email on mediation; J Bryant email on 11th report	2.2		
12/22/2016	Review of C Turner email w order; forward same to TRA; G matherne email on order; email from T Shaw's office on mediation date	0.2		
12/26/2016	email to R Moore re 11th report; email to Judge Turnbull & group re mediation	0.2		
12/27/2016	review of Judge Turnbull email re mediation; response; draft of modification to global mediation order; modify proposed order re global mediation; email to parties with request for return	1.0		
12/28/2016	review of R Moore email on mediation; 11th report email transmission to TRA; V Broemel email re proposed order; T.C. w potential customer of LHWS	0.2		
12/29/2016	2 calls to C Smith re LHWS finances; message for E Bolin re operator for LHWS	<u>0.3</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
11/9/2016	Postage for 9th Report (incurred in November)	\$97.67		
12/2/2016	Postage for 10th Report	\$90.29		

Other Expenses Reimburseable Total		<u>\$187.96</u>
Balance Owed this month		\$2,455.96
Previous Balance Owed	\$7,926.79	
Total Amount Due and Payable		\$10,382.75

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

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

12/02/16 04:56 PM

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



001	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0367692694		
002	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0301026616		
003	001040 (001)	TO \$	9.71
	Ground Commercial		
	Tracking# 1Z303Y3Y0301027197		
004	000008 (022)	TO \$	12.84
	Priority Mail		
	Tracking# 9405510200881227089706		
005	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0367694432		
006	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0301028356		
007	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0301028936		
008	001045 (001)	TO \$	10.28
	Ground Residential		
	Tracking# 1Z303Y3Y9067698179		

SubTotal \$ 90.29
Total \$ 90.29

Master Card \$ 90.29

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

Receipt ID 82997719944747888533 008 Items
CSH: David Tran: 7575 Reg: 002

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

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

11/09/16 05:45 PM

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



001	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0300843913		
002	001040 (001)	TO \$	9.71
	Ground Commercial		
	Tracking# 1Z303Y3Y0300844494		
003	000008 (022)	TO \$	12.84
	Priority Mail		
	Tracking# 9405510200828200343743		
004	001040 (001)	TO \$	11.88
	Ground Commercial		
	Tracking# 1Z303Y3Y0300845653		
005	001040 (001)	TO \$	9.28
	Ground Commercial		
	Tracking# 1Z303Y3Y0300846232		
006	001040 (001)	TO \$	12.31
	Ground Commercial		
	Tracking# 1Z303Y3Y0367513476		
007	001040 (001)	TO \$	12.85
	Ground Commercial		
	Tracking# 1Z303Y3Y0300847393		
008	001045 (001)	TO \$	11.05
	Ground Residential		
	Tracking# 1Z303Y3Y9000847970		
009	020587 (002)	T1 \$	3.05
	12x9x3 Box		
010	030175 (016) ****S****	TO \$	2.50
	12x9x3 Serv Std		

SubTotal \$ 97.38
State and County Tax (T1) \$ 0.29
Total \$ 97.67

Master Card \$ 97.67

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

Receipt ID 82997719304842888563 010 Items
CSH: David Tran: 7072 Reg: 002

DON'T LIKE TO WRAP, WE GOT YOUR BACK!

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

JANUARY 6, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1027750

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH DECEMBER 31, 2016

REMITTANCE ADVICE PAGE

TOTAL SERVICES	\$10,125.00
OTHER CHARGES AND DISBURSEMENTS	\$21.31
TOTAL THIS INVOICE	\$10,146.31
PREVIOUSLY BILLED AND OUTSTANDING	\$31,662.47
TOTAL AMOUNT DUE	\$41,808.78

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

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

JANUARY 6, 2017
008264.000036
J. GRAHAM MATHERNE

INVOICE # 1027750

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
C/O RECEIVERSHIP MANAGEMENT, INC.
P.O. BOX 2307
BRENTWOOD, TN 37024

RE: LAUREL HILLS WATER UTILITY RECEIVERSHIP

FOR PROFESSIONAL SERVICES RENDERED THROUGH DECEMBER 31, 2016

12/01/16	E-MAILS OF COUNSEL REGARDING JANUARY 9TH MEDIATION WITH GREG CASHION (.10); TELEPHONE CONFERENCE WITH JUDY SWALLOWS REGARDING COUD EASEMENT (.10); LETTER TO SWALLOWS REGARDING SAME (.20); TELEPHONE CONFERENCE WITH D. KENDALL REGARDING COUD EASEMENT AND RELATED MATTERS (.20); E-MAIL REPORT TO R. MOORE AND E. SINOR REGARDING SAME AND REGARDING SERVICE IN CONDEMNATION ACTION (.20); WORK REGARDING REVIEW OF FILE REGARDING UPCOMING MEDIATION AND REGARDING PRESENTATION OF SAME (1.00). J. GRAHAM MATHERNE 1.80 hours at 270.00 per hour.	486.00
12/02/16	TELEPHONE CONFERENCE WITH DART KENDALL REGARDING STATUS ISSUES AND MATTERS REGARDING EASEMENTS, PROPERTY INTERESTS, ETC. (.60); REVIEW E-MAILS REGARDING MEDIATION AND RELATED MATTERS (.20). J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00
12/05/16	TELEPHONE CONFERENCE WITH PHIL LANDRUM (ATLANTA COAST CONV. COUNSEL) (.50); FURTHER WORK ON MATTERS REGARDING MEDIATION (.30). J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1027750

12/06/16 FURTHER REVIEW OF CONSERVATION EASEMENT INFORMATION AND RELATED MATERIALS AND CROSS-REFERENCE TO PLATS OF DEVELOPMENT (1.20); E-MAILS WITH COUNSEL REGARDING SERVICE OF PROCESS (.20); FURTHER WORK AS TO COMPILING INFORMATION FOR MEDIATION (.60).
J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

12/07/16 E-MAILS WITH MOORE AND SINOR REGARDING MOY TOY REQUEST FOR EXTENSION TO ANSWER POST-MEDIATION (.30); E-MAILS WITH S. HALL REGARDING SAME (.10); REVIEW E-MAILS REGARDING MEDIATION PROCEDURES (.20); TELEPHONE CONFERENCE WITH COUNSEL REGARDING STATUS ISSUES ON CONDEMNATION, CONVERSATION WITH LANDRAM AND OTHER RELATED MATTERS (.40); TELEPHONE CONFERENCE WITH CLERK AND MASTER REGARDING ENTRY OF ORDERS (.10); LENGTHY TELEPHONE CONFERENCE WITH ROB SCHWERER REGARDING TERRA MOUNTAIN/MOY TOY/CONDEMNATION ACTION, MEDIATION AND FACTUAL HISTORY OF SITUATION (1.10); REVIEW EASEMENT MATERIALS (.40); FURTHER WORK AS TO ISSUES FOR MEDIATION (.70).
J. GRAHAM MATHERNE 3.30 hours at 270.00 per hour. 891.00

12/08/16 E-MAILS WITH R. MOORE AND E. SINOR REGARDING CONFERENCE CALL (.10); REVIEW COUNSEL ORDER REGARDING MEDIATION (.10); REVIEW MATERIALS REGARDING PREPARATION FOR CONFERENCE CALL WITH MOORE AND SINOR (.30); REVIEW LETTER FROM SCHWERER (TERRA MOUNTAIN) (.20); LENGTHY STATUS CONFERENCE CALL WITH MOORE AND SINOR (1.10).
J. GRAHAM MATHERNE 1.80 hours at 270.00 per hour. 486.00

12/12/16 E-MAIL WITH R. SCHWERER REGARDING CIRCUIT COURT ORDER; MEDIATION AND KEMMER/COUD EASEMENTS (.30); E-MAIL TO D. KENDALL REGARDING KEMMER AND COUD EASEMENTS (.30); E-MAIL TO TRA REGARDING KEMMER AND COUD EASEMENTS (.30); DRAFTING OF TERRA MOUNTAIN EASEMENT AND REVIEW OF CONSERVATION DEED REGARDING SAME (1.40); FURTHER E-MAILS WITH ALL COUNSEL REGARDING MEDIATION (.70); REVIEW E-MAILS WITH CASHION AS TO BACKGROUND AND PREVIOUS FILINGS (.20).
J. GRAHAM MATHERNE 3.20 hours at 270.00 per hour. 864.00

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1027750

12/13/16 E-MAILS AS TO CONFERENCE WITH G. CASHION REGARDING MEDIATION (.30); TELEPHONE CONFERENCE WITH A. CONKLIN AND E. SINOR REGARDING SCHEDULED CONFERENCE CALL WITH CASHION AND REGARDING E-MAIL FROM CASHION REGARDING POSSIBLE CONFLICT (.30); LENGTHY TELEPHONE CONFERENCE WITH COUNSEL GROUP AND CASHION REGARDING MEDIATION ISSUES (1.00); LENGTHY TELEPHONE CONFERENCE WITH SINOR AND SINOR AND MOORE REGARDING SAME (1.00).
J. GRAHAM MATHERNE 2.60 hours at 270.00 per hour. 702.00

12/14/16 WORK ON EASEMENT AND DEED DRAFTS (1.30); REVIEW PLAT INFORMATION AS TO EASEMENT ISSUES (.70); REVIEW ISSUE OF DAMAGES/COMPENSATION IN EMINENT DOMAIN CONTEXTS (.90).
J. GRAHAM MATHERNE 2.90 hours at 270.00 per hour. 783.00

12/15/16 NUMEROUS E-MAILS WITH COUNSEL REGARDING ISSUES OF MEDIATION, CONFLICT OF CASHION AND POTENTIAL MEDIATORS (1.10); CONTINUAL DRAFTING AS TO TERRA MOUNTAIN EASEMENT (.70); E-MAIL WITH COUNSEL REGARDING OK AS TO KEMMER AND COUD EASEMENT (.10); E-MAIL WITH R. MOORE AND E. SINOR REGARDING SAME (.10).
J. GRAHAM MATHERNE 2.00 hours at 270.00 per hour. 540.00

12/16/16 E-MAILS WITH COUNSEL REGARDING POTENTIAL NEW MEDIATOR (.50); CONTINUAL WORK AS TO REVIEW OF FILES AND DRAFTING TEMPLATES AS TO EASEMENT, ETC. (1.80).
J. GRAHAM MATHERNE 2.30 hours at 270.00 per hour. 621.00

12/19/16 NUMEROUS E-MAILS WITH COUNSEL REGARDING MEDIATION AND MEDIATOR SELECTION (.60); REVIEW OF FILE DOCUMENTS (TRA SETTLEMENT, IRREVOCABLE LICENSE, CONSERVATION EASEMENT) REGARDING OUTLINING ISSUES FOR MEDIATION STATEMENT AND REGARDING EASEMENT AND DEED TEMPLATES; REVIEW OF COUD AND KEMMER EASEMENTS REGARDING SAME; REVIEW OF MOY TOY-TERRA MOUNTAIN TRANSFERS REGARDING EXCLUSIONS AND PROPERTY IDENTIFICATION REGARDING SAME; FURTHER DRAFTING OF EASEMENTS ON WATER SUPPLY LINE AND RELATED MATTERS.
J. GRAHAM MATHERNE 5.90 hours at 270.00 per hour. 1593.00

CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1027750

Jan 6, 2017
PAGE 5

12/20/16	REVIEW TRA SETTLEMENT AGREEMENT REGARDING WATER TOWER PROPERTY (.40); OUTLINING OF SAME (.40); REVIEW MOY TOY QUITCLAIM DEED (.30); INITIAL DRAFTING OF DEED (.70); REVIEW AND REVISE TERRA MOUNTAIN EASEMENT AND MOY TOY EASEMENT REGARDING WATER SUPPLY LINE (.40); E-MAILS WITH COUNSEL GROUP REGARDING SAME (.20); REVIEW EAGLE'S NEST EASEMENT (.30); E-MAIL COUNSEL GROUP REGARDING SAME (.20); FURTHER E-MAILS REGARDING MEDIAITON (.30). J. GRAHAM MATHERNE 3.20 hours at 270.00 per hour.	864.00
12/21/16	E-MAILS WITH COUNSEL REGARDING MEDIATION (.30); REVIEW OF FILE/REPORTS/OTHER DOCUMENTS REGARDING PREPARATION FOR DRAFTING OF MATERIALS FOR MEDIATION (.80); E-MAIL FROM COUNSEL REGARDING DRAFT EASEMENT ISSUES AND RELATED MATTERS (.20); REVIEW OF DRAFTS REGARDING SAME (.50). J. GRAHAM MATHERNE 1.80 hours at 270.00 per hour.	486.00
12/22/16	REVIEW E-MAILS REGARDING COURT ORDER APPROVING RECEIVER'S 10TH REPORT (.20); REVIEW OF SAME (.10); WORK REGARDING MEDIATION STATEMENT AND RELATED MATTERS (1.10). J. GRAHAM MATHERNE 1.40 hours at 270.00 per hour.	378.00
12/26/16	E-MAILS WITH E. SINOR REGARDING MEDIATION SCHEDULING AND ISSUES. J. GRAHAM MATHERNE .20 hours at 270.00 per hour.	54.00
12/27/16	E-MAILS WITH COUNSEL REGARDING SETTING OF MEDIATION WITH JUDGE TURNBULL (.20); REVIEW OF PROPOSED ORDER REGARDING MEDIATION (.20); E-MAIL WITH SINOR REGARDING SAME (.10). J. GRAHAM MATHERNE .50 hours at 270.00 per hour.	135.00
12/28/16	WORK ON DRAFT DEEDS AND EASEMENT IN PREPARATION OF DRAFTING OF MEDIATION STATEMENT AND CONTACT WITH TERRA MOUNTAIN, MOY TOY, ETC. J. GRAHAM MATHERNE .80 hours at 270.00 per hour.	216.00
12/29/16	E-MAILS WITH D. KENDALL REGARDING RESETTING MEDIATION (.10); E-MAIL WITH SINOR REGARDING SAME (.10). J. GRAHAM MATHERNE .20 hours at 270.00 per hour.	54.00
	TOTAL SERVICES	37.50 \$10,125.00

OUTSIDE DELIVERY COSTS

16.96
CONTINUE NEXT PAGE

JEANNE BRYANT/RECEIVERSHIP MANAGEMENT, INC.
MATTER NUMBER: 008264.000036
INVOICE NO.: 1027750

PHOTOCOPIES PGAMBEL 19	2.85
PHOTOCOPIES JKMONTGOMERY 4	0.60
PHOTOCOPIES JKMONTGOMERY 3	0.45
PHOTOCOPIES JKMONTGOMERY 1	0.15
PHOTOCOPIES JKMONTGOMERY 2	0.30

OTHER CHARGES AND DISBURSEMENTS	\$21.31

TOTAL THIS INVOICE	\$10,146.31

PREVIOUSLY BILLED AND OUTSTANDING	\$31,662.47

TOTAL AMOUNT DUE	\$41,808.78
	=====

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

-----	TIMEKEEPER-----	RATE	HOURS	FEEES
J MATHERNE	PARTNER	270.00	37.50	10125.00

RMI EXP RECOVERABLE LHW
12/1/16 Through 12/31/16

Category Description	12/1/16- 12/31/16	OVERALL TOTAL
5100 FEES RMI		
5300-RECEIVERS FEES	-178.80	-178.80
5610-CONTRACT LABOR RMI	-975.05	-975.05
5690-RMI OH EXPENSE	-199.50	-199.50
TOTAL 5100 FEES RMI	-1,353.35	-1,353.35
5150 FEES LEGAL		
5400-LEGAL FEES	-12,602.27	-12,602.27
TOTAL 5150 FEES LEGAL	-12,602.27	-12,602.27
5300 EXPENSES		
6060-RENT	-35.46	-35.46
6205-COPIES	-8.50	-8.50
6210-POSTAGE	-3.94	-3.94
TOTAL 5300 EXPENSES	-47.90	-47.90
OVERALL TOTAL	-14,003.52	-14,003.52

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

1. I am of majority age and have personal knowledge of the facts set forth herein. I submit this Affidavit in support of the Receiver's Motion for Approval and Authorization of Payment of Fees and Expenses, and Interim Taxation of Costs.
2. I am the General Counsel for the Tennessee Regulatory Authority in this matter. Pursuant to Tennessee law, the Tennessee Regulatory Authority took over the operations of the Laurel Hills Water System and moved this Court to appoint Receivership Management, Inc. as Receiver. Said Motion was granted on October 26, 2015.

EXHIBIT
E

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 December 1, 2016 through December 31, 2016 that are contained in this filing.

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

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

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

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

[intentionally blank]

8. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court (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

30th day of January, 2017.

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.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF ROBERT E. MOORE, JR.

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

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

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

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

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

EXHIBIT
E

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

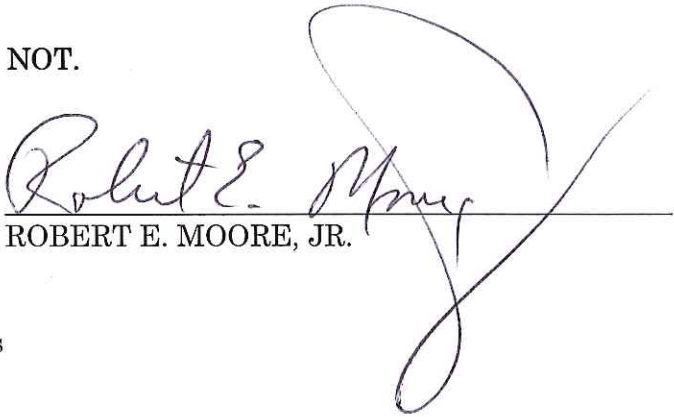
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide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

[intentionally blank]

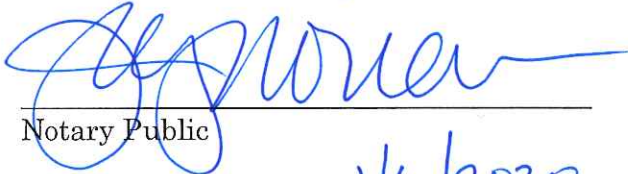
6. Based upon an initial review of financial documentation for LHWS, it appears that there are sufficient assets available to address the payment of the fees and expenses presented for approval in the Receiver's Motion over and above the assets needed for operational expenses, with the exception of the 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 \$3857.21 (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 \$10,146.31 (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

27th day of January, 2017.


Notary Public

Commission Expires: 1/6/2020



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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

MOY TOY, LLC,

Intervening Party.

Docket No. 2012-CH-560
Chancellor Thurman

ORDER GRANTING RECEIVER'S MOTION

On motion of Receivership Management, Inc. [hereinafter the Receiver], filed with this Honorable Court on or about the ____ day of February, 2017, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for December 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 \$14,003.52.

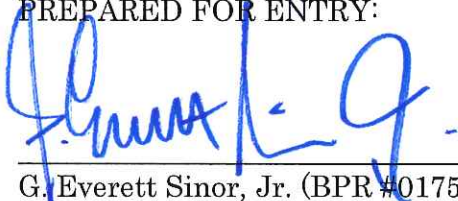
It is further **ORDERED, ADJUDGED, and DECREED** as follows:

- (1) payment to the Receiver in the amount of \$3857.21 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 \$10,146.31.

ENTERED this ___ day of _____, 2017.

The Honorable Ronald Thurman, Chancellor

PREPARED FOR ENTRY:



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

Attorney at Law

Counsel for Receivership Management, Inc.

3504 Robin Road

Nashville, Tennessee 37204

615.969.9027

Everett.Sinor@gmail.com

Certificate of Service

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

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

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

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 _____, 2017.