

G. EVERETT SINOR, JR.
Attorney at Law

August 23, 2016

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

COPY

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

VIA UNITED STATES FIRST CLASS MAILS

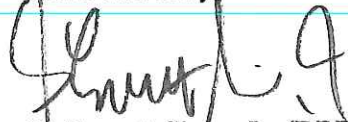
Dear Ms. Tollett:

Please find enclosed herewith the following:

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

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

yours sincerely,



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

Enclosures

cc: Receivership Management, Inc.
Kelly Cashman-Grams, Esq.
James Gass, 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: 8-26, 2016 at 8:25 PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett AP

RECEIVER'S SEVENTH REPORT AND MOTION FOR APPROVAL AND
AUTHORIZATION FOR PAYMENT OF FEES AND EXPENSES

Robert E. Moore, Jr., Attorney and Chief Operations Officer of Receivership Management, Inc. [hereinafter the "Receiver"], the court appointed Receiver of the Laurel Hills water system [hereinafter the "LHWS"] previously controlled by Laurel Hills Condominiums Property Owners Association [hereinafter the "Laurel Hills Condominiums POA"], submits the Receiver's Seventh 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 in the amount of such fees and expenses.

1. On October 26, 2015, the Plaintiff, the Tennessee Regulatory Authority [hereinafter the "TRA" or the "Authority"] filed a Motion for Appointment of Receiver in the above-styled action. Said motion was granted that same day, and, pursuant to Tenn. Code Ann. §§ 65-3-105 and 29-1-101, the Court appointed Receivership Management, Inc. as Receiver of the Laurel Hills Water System by order dated October 26, 2015.¹

¹ This order was amended on April 21, 2016, but Receivership Management, Inc. continues to be the court-appointed receiver for the Laurel Hills Water System. See ¶ 10, *infra*.

2. The Receiver filed its first report with the Cumberland County Clerk and Master on December 12, 2015, in which it provided the Court with financial and operational information for the LHWS, summarized the Receiver's activities regarding the system, and detailed some of the legal issues involving control of the water system properties in question. The Receiver filed its second, third, fourth, fifth and sixth reports with the Cumberland County Clerk and Master on February 24, 2016, March 28, 2016, May 27, 2016, June 27, 2016, and August 4, 2016, respectively, in which it provided the Court with additional financial and operational information, summarized the Receiver's activities regarding the system, and detailed some of the continuing legal issues involving control of the water system properties in question.

Implementation of Receivership Plan

3. 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 for the Receiver's activities relative to the Receivership Plan. As stated in that progress report, the Receiver intends to file a motion with this Court prior to the sale of the LHWS, to ratify the terms and conditions of the purchase agreement and approve the transaction. The preferred bidder, Aqua Green Utility, Inc., has been informed that final approval of the transaction by this Honorable Court is a prerequisite to closing.

Other Activities of the Receiver

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

5. Starting with the July, 2016 billing cycle, LHWS customers received bills that reflected the new rate. In the month of July, 2016, 104 of the 131 customers of the LHWS paid their water bill. Of the 27 non-paying customers, 22 are in the Cumberland Pointe condominium units, and 5 are located elsewhere on Renegade Mountain.

6. The Receiver understands that the Cumberland Pointe Homeowners' Association has acted on its own initiative to cut off LHWS water to non-paying customers, and the Receiver takes no issue with this action. No decision has yet been made by the Receiver as to whether to cut water off to the other non-paying customers of the LHWS.

7. 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.

Financial Information

8. As noted above, each customer of the LHWS received a bill in July of 2016 in the amount of \$114.24 per month, and 27 LHWS customers have not paid their July, 2016 water bill. As of August 18, 2016, there was an accounts receivable balance of \$16,318.49. A copy of the Accounts Receivable Aging Summary, calculated as of August 18, 2016, is attached hereto as Exhibit A and is incorporated herein by reference. However, with 104 customers paying the new, higher rate, the LHWS received \$11,558.71 in payments in July 2016, a much higher amount than in previous months.

9. On a cash basis, LHWS had a net gain in July 2016 of \$4092.65. See Collective Exhibit B, attached hereto and incorporated herein by reference. As of July 31, 2016, LHWS had a balance of \$11,743.81 in its main operating account. See Collective Exhibit C, attached hereto and incorporated herein by reference.

10. The LHWS was able to meet current obligations in July of 2016.² Even though the LHWS has a relatively large accounts receivable balance, all past due balances have been satisfied, and the Receiver's fees and expenses can be paid out of estate assets upon approval by this Honorable Court.

Fees and Expenses of Receiver

11. 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.³

12. 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 Ms. Jeanne Bryant, Mr. Cody Smith, and Ms. Jere Cowan, performed work for this Receivership for the period of July 1, 2016 through July 31, 2016 in the amount of \$1495.26.⁴ Those working on contract for the Receiver under Mr. Moore (Mr. Sinor) have performed work for the Receivership and have incurred fees and expenses as shown in Collective Exhibit D for the period July 1, 2016 through July 31, 2016 in the amount of \$1568.00.

13. The Authority has determined these fees, costs and expenses to be reasonable, appropriate and necessary for the services rendered for the Receivership, and,

² 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.

³ Amended Order Appointing Receiver, entered April 21, 2016, at ¶ 10, pp. 4-6.

⁴ This figure includes normal overhead and operating costs and expenses, charged by Receivership Management, Inc., for the period of July 1, 2016 through July 31, 2016, which total \$288.51.

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 Jeanne B. Bryant, attached hereto as Exhibit F and incorporated herein by reference.

14. 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 July of 2016: \$1495.26; and,
- b. Invoices for those working under Mr. Moore for July of 2016: \$1568.00.

15. 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 in the aggregate amount of \$3063.26, and further **MOVES** this Court to authorize payment of such fees and expenses out of Laurel Hills Water System in Receivership estate's funds.

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*

by [Signature] in permission granted on August 18, 2016

[Signature]

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

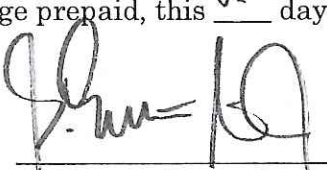
James L. Gass, Esq.
Ogle, Gass & Richardson
Counsel for Laurel Hills Condominiums
Property Owners Association
103 Bruce Street
Sevierville, Tennessee 37862

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 ^{23rd} day of August, 2016.



G. Everett Sinor, Jr. ✓

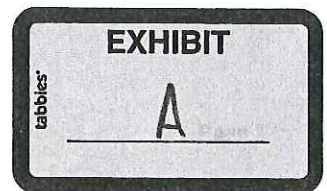
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08/18/16

Laurel Hills Water System In Receivership A/R Aging Summary As of August 18, 2016

| | Current | 1 - 30 | 31 - 60 | 61 - 90 | > 90 | TOTAL |
|----------------------------------|-------------|------------------|-----------------|--------------|-----------------|------------------|
| BOWLES, MELVIN & MARY ANNE | 0.00 | 114.24 | 114.24 | 0.00 | 0.00 | 228.48 |
| CECCHETT, DON & DIANNE | 0.00 | 32.59 | 0.00 | 0.00 | 0.00 | 32.59 |
| CPCA (84) | 0.00 | 9,596.16 | 2,513.28 | 0.00 | 0.00 | 12,109.44 |
| DEPEW, MICHAEL (Great Warrior) | 0.00 | 14.94 | 0.00 | 0.00 | 0.00 | 14.94 |
| DEPEW, MICHAEL (Running Deer) | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| DOUGLAS, JIMMY & JACKIE | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| HEIRS, LUKE & ANNA DUNN | 0.00 | 114.24 | 114.24 | 33.10 | 33.10 | 294.68 |
| HENMAN, MIKE | 0.00 | 0.20 | 0.00 | 0.00 | 0.00 | 0.20 |
| HOGARTH, ARDIS | 0.00 | 114.24 | 114.24 | 0.00 | 0.00 | 228.48 |
| JUDD, JONATHAN | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| LATHAM, KENT | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| 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 |
| MATERDOMINI, DINA | 0.00 | 114.24 | 0.00 | 33.10 | 0.10 | 147.44 |
| MCMEANS, LARRY | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| MITCHELL SHARON | 0.00 | 114.24 | 114.24 | 33.10 | 728.20 | 989.78 |
| NEALE, MIKE | 0.00 | 32.08 | 0.00 | 0.00 | 0.00 | 32.08 |
| NUGENT, GERALD | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| PETERS, JOHN (1) | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| PETERS, JOHN (2) | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| PETERS, JOHN (3) | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| PETERS, JOHN (4) | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| ROBINSON, CARL | 0.00 | 114.24 | 0.00 | 0.00 | 0.00 | 114.24 |
| 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 |
| ZABELNY, LOUIS & RENEE TODD | 0.00 | 114.24 | 114.24 | 0.00 | 0.00 | 228.48 |
| TOTAL | 0.00 | 12,075.01 | 3,084.48 | 99.30 | 1,059.70 | 16,318.49 |

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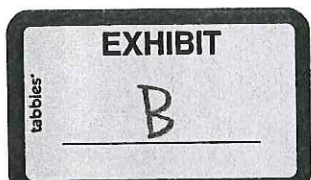


LAUREL HILLS WATER DISTRICT
 SCHEDULE OF RECEIPTS, DISBURSEMENTS AND NET ASSETS
 (WATER OPERATIONS ONLY)

| | FOR THE PERIOD | | |
|---|-------------------------|-----------------------|-------------------------|
| | 10/26/2015 6/30/2016 | 7/1/2016 7/31/2016 | 10/26/2015 7/31/2016 |
| RECEIPTS | | | |
| 1000-INTEREST INCOME | - | - | - |
| 1010-REGIONS 8611 | - | - | - |
| 4910-WATER BILL RECEIPTS | 38,294.06 | 11,558.71 | 49,852.77 |
| TOTAL REVENUE | 38,294.06 | 11,558.71 | 49,852.77 |
| DISBURSEMENTS | | | |
| FEEES | | | |
| 5695-ACCOUNTING FEES | 900.00 | - | 900.00 |
| 5400-LEGAL FEES | 49.00 | - | 49.00 |
| 5610-CONTRACT LABOR | 2,345.56 | - | 2,345.56 |
| TOTAL FEES | 3,294.56 | - | 3,294.56 |
| OTHER EXPENSES: | | | |
| 5697-OTHER FEES | 100.00 | - | 100.00 |
| 6060-RENT | - | - | - |
| 6190-EQUIPMENT MAINTENANCE | 349.78 | - | 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 | 26,203.70 | 1,150.63 | 27,354.33 |
| 6299-MISC EXPENSE | 607.28 | - | 607.28 |
| 6325-BANK CHARGES | 12.00 | - | 12.00 |
| 6330-COURT COSTS | - | - | - |
| 6340-INSURANCE | - | 6,315.43 | 6,315.43 |
| 6350-TRAVEL | - | - | - |
| TOTAL OTHER EXPENSES | 27,448.34 | 7,466.06 | 34,914.40 |
| TOTAL EXPENSES | 30,742.90 | 7,466.06 | 38,208.96 |
| NET RECEIPTS LESS DISBURSEMENTS | 7,551.16 | 4,092.65 | 11,643.81 |
| SCHEDULE OF CHANGE IN NET ASSETS | | | |
| FUND BALANCE RECEIVED | 100.00 | - | 100.00 |
| NET RECEIPTS LESS DISBURSEMENTS | 7,551.16 | 4,092.65 | 11,643.81 |
| DISTRIBUTIONS PAID | - | - | - |
| CLAIMS PAYABLE | - | - | - |
| NET ASSETS | 7,651.16 | - | 11,743.81 |
| 8/18/2016 12:46 | | | |
| TOTAL ASSETS | 7,651.16 | - | 11,743.81 |
| TOTAL LIABILITIES | - | - | - |
| NET ASSETS | 7,651.16 | - | 11,743.81 |

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 Cumberland County, Crossville, TN
 BY: Sue Toilett

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



LAUREL HILLS WATER DISTRICT
REGIONS BANK ACCOUNT 232618611

7/31/2016

OPERATING BANK ACCOUNT

BALANCE PER BANK STMT BALANCE PER GENERAL LEDGER

END OF MONTH AC 232618611 12,426.94 11,743.81
END OF MONTH AC 232618638 (12.00)
OUTSTANDING CHECKS (671.13)

11,743.81 11,743.81

17-Aug-16
03:27 PM

OUTSTANDING CHECKS

CAN 25% PYMT & JUNE PYMT

1037 201.00
1039 470.13

671.13

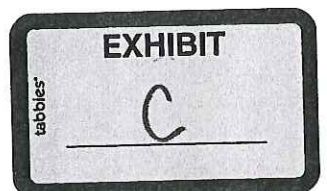
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Cumberland County, Crossville, TN

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
 July 1, 2016 through July 29, 2016

SUMMARY

| | | | |
|---------------------|---------------|-----------------|---------|
| Beginning Balance | \$7,663.16 | Minimum Balance | \$1,347 |
| Deposits & Credits | \$11,558.71 + | Average Balance | \$5,325 |
| Withdrawals | \$6,315.43 - | | |
| Fees | \$0.00 - | | |
| Automatic Transfers | \$0.00 + | | |
| Checks | \$479.50 - | | |
| Ending Balance | \$12,426.94 | | |

DEPOSITS & CREDITS

| | | |
|--------------------------|---------------------|-------------|
| 07/13 | Deposit - Thank You | 198.60 |
| 07/13 | Deposit - Thank You | 1,583.02 |
| 07/20 | Deposit - Thank You | 604.30 |
| 07/20 | Deposit - Thank You | 1,371.37 |
| 07/25 | Deposit - Thank You | 7,801.42 |
| Total Deposits & Credits | | \$11,558.71 |

WITHDRAWALS

| | | | |
|-------|-----|---|----------|
| 07/06 | Cna | ACH Prem-Pymt Laurel Hills W 3030879561 | 6,315.43 |
|-------|-----|---|----------|

CHECKS

| Date | Check No. | Amount | Date | Check No. | Amount |
|-------|-----------|--------|------|-----------|--------|
| 07/19 | 1036 | 479.50 | | | |

DAILY BALANCE SUMMARY

| Date | Balance | Date | Balance | Date | Balance |
|-------|----------|-------|----------|-------|-----------|
| 07/06 | 1,347.73 | 07/19 | 2,649.85 | 07/25 | 12,426.94 |
| 07/13 | 3,129.35 | 07/20 | 4,625.52 | | |

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

Jeanne Barnes Bryant


| | |
|----------------------------|----------|
| July 2016 Fees | \$268.20 |
| July 2016 Overhead Expense | \$25.20 |

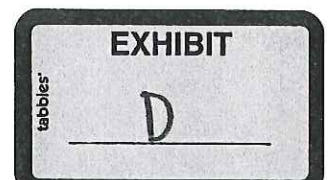
Receivership Management, Inc.

| | |
|----------------------------|----------|
| July 2016 Fees | \$938.55 |
| July 2016 Overhead Expense | \$160.30 |
| July 2016 Expenses | \$103.01 |

Everett Sinor

| | |
|---------------------------|-------------------|
| July 2016 Fees & Expenses | <u>\$1,568.00</u> |
| | \$3,063.26 |

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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 | | July 2016 |
|-----------------------------|----------------------|----------------------|
| 7/5/2016 | Jeanne Barnes Bryant | 0.2 \$163.00 \$32.60 |
| 7/11/2016 | Jeanne Barnes Bryant | 0.2 \$163.00 \$32.60 |
| 7/14/2016 | Jeanne Barnes Bryant | 0.5 \$163.00 \$81.50 |
| 7/15/2016 | Jeanne Barnes Bryant | 0.1 \$163.00 \$16.30 |
| 7/18/2016 | Jeanne Barnes Bryant | 0.3 \$163.00 \$48.90 |
| 7/20/2016 | Jeanne Barnes Bryant | 0.1 \$163.00 \$16.30 |
| 7/21/2016 | Jeanne Barnes Bryant | 0.1 \$163.00 \$16.30 |
| 7/22/2016 | Jeanne Barnes Bryant | 0.1 \$163.00 \$16.30 |
| 7/26/2016 | Jeanne Barnes Bryant | 0.2 \$163.00 \$32.60 |
| Total | | \$293.40 |

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

Invoice for Professional Services

July 2016

LAUREL HILLS WATER DISTRICT

| 7/1/2016 | Cody C. Smith | | | 0.5 | \$123.00 | \$61.50 | POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 06-30-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 06-30-16. | | |
|----------|----------------------|--|--|-----|----------|----------|--|--|--|
| 7/1/2016 | Jere P. Cowan | | | 0.2 | \$50.00 | \$10.00 | CONFERENCE WITH C SMITH RE: BOND PAYMENT; RECEIPT DEPOSIT INFO FROM T. STEPHENS | | |
| 7/4/2016 | Cody C. Smith | | | 0.5 | \$123.00 | \$61.50 | POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE MONTH END CLOSING ENTRIES AND UPDATE TRIAL BALANCE THRU 06-30-16. INSPECT ASSET AND LIABILITY ACCOUNTS FOR PROPER BACKUP DOCUMENTATION. PREPARE SCHEDULE OF RECEIPTS AND DISBURSEMENTS THRU 06-30-16. | | |
| 7/5/2016 | Robert E. Moore, Jr. | | | 0.1 | \$153.00 | \$15.30 | REPLY TO EMAIL FROM E.SINOR RE: BID INQUIRIES .10 | | |
| 7/6/2016 | Jere P. Cowan | | | 0.1 | \$50.00 | \$5.00 | TELEPHONE CONVERSATION WITH TN WATER RE: BID; EMAIL TO R. MOORE RE: SAME | | |
| 7/6/2016 | Robert E. Moore, Jr. | | | 0.1 | \$153.00 | \$15.30 | CALL TO KEVIN AT TENNESSEE WATER-REQUEST FOR INFORMATION, UPDATE E.SINOR .1 | | |
| 7/7/2016 | Cody C. Smith | | | 1.2 | \$123.00 | \$147.60 | UPDATE REGISTER AND RECONCILE BANK ACCOUNT. RECEIVE INSURANCE PYMT SCHEDULE AND UPDATE CURRENT O/S BILLS TO BE PAID. EMAIL EVERETT BACK UP DOCUMENTATION ALONG WITH FINANCIALS. | | |
| 7/7/2016 | Jere P. Cowan | | | 0.1 | \$50.00 | \$5.00 | EMAIL FROM R. MOORE RE: CONTACT INFO NEEDED; RESEARCH SAME | | |

LAUREL HILLS WATER DISTRICT

July 2016

| Date | Name | Description | Hours | Rate | Total |
|-----------|----------------------|--|-------|----------|----------|
| 7/7/2016 | Robert E. Moore, Jr. | CALL FROM K.GREENE RE: STATUS ON BID PROCESS UPDATE, DISCUSSION OF PROJECT STATUS .2; RECEIVE AND PROCESS REQUEST FOR INFORMATION .75 | 0.95 | \$153.00 | \$145.35 |
| 7/8/2016 | Jere P. Cowan | RECEIPT INVOICES FOR PROCESSING AND PAYMENT OF SAME; FORWARD SAME; UPDATE FINANCIAL RECORDS | 0.4 | \$50.00 | \$20.00 |
| 7/8/2016 | Jere P. Cowan | PREPARE BID MATERIALS TO K. KUCHINSKI FOR R. MOORE; TRAVEL TO POST OFFICE RE: CERTIFIED MAILING | 0.7 | \$50.00 | \$35.00 |
| 7/13/2016 | Robert E. Moore, Jr. | CALL WITH E.SINOR, REVIEW DRAFTED EMAIL RESPONSE TO BIDDING QUESTION .25 | 0.25 | \$153.00 | \$38.25 |
| 7/14/2016 | Jere P. Cowan | EMAILS FROM E. SINOR RE: STATUS REPORT TO COURT, NEEDED FINANCIALS AND EXHIBITS FOR SAME; ASSISTANCE WITH PREPARATION OF SAME; EDITS TO REPORT FOR SAME | 1 | \$50.00 | \$50.00 |
| 7/18/2016 | Cody C. Smith | UPDATE REGISTER AND RECONCILE BANK ACCOUNT | 0.3 | \$123.00 | \$36.90 |
| 7/18/2016 | Jere P. Cowan | EMAIL INVOICE FROM R. MOORE FOR PROCESSING | 0.1 | \$50.00 | \$5.00 |
| 7/19/2016 | Cody C. Smith | EMAIL EVERETT CONCERNING PAYMENT SCHEDULE AND INVOICES PAID FOR INSURANCE POLICY. PROVIDE BACK UP DOCUMENTATION FOR FILINGS. | 0.8 | \$123.00 | \$98.40 |
| 7/20/2016 | Cody C. Smith | CONFERENCE CALL WITH EVERETT SINOR TO DISCUSS INVOICES AND FINANCIALS FOR LHW D MAY & JUNE. | 1 | \$123.00 | \$123.00 |
| 7/25/2016 | Jere P. Cowan | EMAIL TO E. SINOR RE: FUNDS RECEIVED | 0.1 | \$50.00 | \$5.00 |
| 7/25/2016 | Jere P. Cowan | BID PROPOSAL RECEIVED; REVIEW AND FORWARD TO R. MOORE | 0.2 | \$50.00 | \$10.00 |
| 7/25/2016 | Jere P. Cowan | RESEARCH FUNDS RECEIVED; UPDATE AND POSTING FINANCIAL TRANSACTIONS; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNTS RE: SAME; PROCESS PAYMENTS OUTSTANDING | 1 | \$50.00 | \$50.00 |
| 7/25/2016 | Robert E. Moore, Jr. | UPDATES ON BIDS, QUESTIONS RE: EXHIBITS ON REPORT .25; RECEIVE BID FROM AQUA GREEN, CONFIRM RECEIPT .10 | 0.35 | \$153.00 | \$53.55 |
| 7/26/2016 | Cody C. Smith | POST FEE AND EXPENSE ACCRUALS TO GL. PREPARE NECESSARY BACKUP DOCUMENTATION. | 0.3 | \$123.00 | \$36.90 |

LAUREL HILLS WATER DISTRICT

July 2016

| Date | Name | Description | 0.1 | 0.2 | 0.4 | 0.5 |
|--------------|----------------------|--|----------|-----|---------|-------------------|
| 7/26/2016 | Jere P. Cowan | RECEIPT AND PROCESSING PAYMENT FOR INVOICES RECEIVED; CONFERENCE WITH C. SMITH RE: SAME; UPDATE FINANCIAL ACCOUNTS RE: SAME; CONFERENCE WITH J. BRYANT RE: PAYMENTS DUE AND PROCESSING SAME | | | \$50.00 | \$20.00 |
| 7/28/2016 | Robert E. Moore, Jr. | EMAIL FROM E.SINOR RE: REPORT ACTIVITY .10 | \$153.00 | | | \$15.30 |
| 7/29/2016 | Jere P. Cowan | CONFERENCE WITH R. MOORE RE: PREPARATION OF STATUS REPORT FOR FILING WITH COURT AND EXHIBITS | \$50.00 | | | \$10.00 |
| 7/29/2016 | Jere P. Cowan | RECEIPT INVOICES FOR REVIEW AND PAYMENT PROCESSING; CONFERENCE WITH C. SMITH RE: SAME; FORWARD SAME | \$50.00 | | | \$25.00 |
| Total | | | | | | |
| | | | | | | \$1,098.85 |

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

August 1, 2016

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

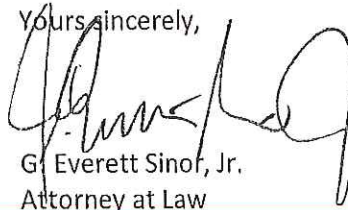
RE: July 2016 Billings – RMI/Laurel Hills Water System in Receivership

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> |
|-------------|--|--------------|-------------|------------|
| 7/1/2016 | Finalize notice insert for LHWS customers; email from M Hargis re insurance; T.C.s w C Smith & R Moore re insurance; T.C. w M Hargis re insurance; T.C. w C. Smith re bills for LHWS and cash flow issues | 0.5 | | |
| 7/6/2016 | Voicemail from R Moore re: Tennessee Water interest in LHWS; email from C. Smith re June fees & expenses & report; email to C Smith re same | 0.1 | | |
| 7/7/2016 | Email response to C Smith re G Williams billings; t.c. w C smith re financial information for sixth report; T C w R Moore re LHWS matters, including, bid interest, emails to potential suitors, and next report to court | 0.6 | | |
| 7/8/2016 | Review of emails from M McClung, R Moore & Kevin Kruchinski re LHWS matters, respond to same; email to R Moore on various LHWS matters relating to bid process, questions from suitors, and sixth report; T.C. w R Moore re same; Voicemail for Ms. Levondosky re fifth report; emails to C Smith, T Stephens, & G Williams re sixth report items; email to K Kruchinski re his request for information on bid | 1.4 | | |
| 7/10/2016 | E-mail to J Bryant & R Moore re T.C. w K Cashman-Grams re LHWS matters | 0.1 | | |
| 7/11/2016 | email from Cumberland Co. C&M re order; G. Williams invoice & email concerning discontinuing service; V.M. left for Mr. Williams re: same; T.C. w R Moore re same | 0.2 | | |
| 7/12/2016 | Review Attorney Gass appearance doc.; forward same to R Moore; Call w G. Williams re email and desire to discontinue service and lack of payment; V.M. w R Moore re: same; V.M. & return V.M. to Jim Lehman; V.M. from Artis Hogarth on Renegade Mtn re lack of a bill | 0.2 | | |
| 7/13/2016 | Call at lunchtime w A Hogarth re: her bill; T.C. w Jim Lehman w TRA re LHWS matter and potential motion; Review of Malinda Stephens w Lansford & Stephens email with LHWS deposit information; T.C. w R Moore re developments on LHWS | 0.9 | | |
| 7/14/2016 | T.C. w David Hinkson w Tennessee American Water re titling issues; email from D Hinkson re same; draft response to R Moore to Mr. Hinkson; email to T Stephens re A Hogarth's complaint that she is not getting a bill; email to A Hogarth re same; provide response to Mr. Hinkson; prep of 6th report; review R Moore email to Dave Carter with CPCA | 2.6 | | |
| 7/15/2016 | review J Cowan emails re: sixth report | 0.1 | | |

| | | | | |
|-----------|--|-------------|-----------------|-------------------|
| 7/18/2016 | Review of order from court; forward said order to RMI & TRA officials; T.C. w C Smith & J Bryant re sixth report finishes; T.C. w C Eaton & VM for E Neubert; T.C. to T Stephens re: A/R summary; T.C. w T. Stephens office re May 2016 bill | 1.4 | | |
| 7/19/2016 | T.C. w R Moore & C Smith re sixth report; final modifications to report before sending to TRA; review of C Smith email on insurance, response to same, requesting actual invoice or payment schedule; email to M Hargis & K Johnston @ AJC re invoices from CNA on insurance; emails to C Smith & Sheila McNamara @ CNA regarding insurance; | 0.7 | | |
| 7/20/2016 | Sixth report revisions and draft finalization; transmit to Kelly Cashman-Grams for review; T C w R Moore re A/R register and lack of payment from Cumberland Pointe; email from Patricia Dunford @ CNA re lack of invoice; response re same; | 1.1 | | |
| 7/21/2016 | Review of C Smith email on deposits; Call w T Stephens re same; T.C. w Connie @ Cumberland County C&M re August docket call; T.C. w D Carter (2) re Cumberland Pointe late payment; email to RMI re same; review of new A/R again summary; | 0.7 | | |
| 7/22/2016 | Email from K Johnston @ AJG re insurance; T.C. w D Carter re Cumberland Pointe payment | 0.1 | | |
| 7/25/2016 | Email from Lansford & Stephens re: deposit; email to J Bryant verifying F&E; | 0.1 | | |
| 7/26/2016 | Email to K. Kruchinski re potential bid; email from K. Kruchinski re same | 0.1 | | |
| 7/27/2016 | Review of Lansford & Stephens emails re Volunteer Electric bill; email to C Smith re same and change of address; V.M. from Jim Layman re docket call | 0.1 | | |
| 7/28/2016 | T.C. w J Layman re docket call; email to JBB & R Moore re same; email re sixth report | <u>0.2</u> | | |
| | Hourly Billing Total | 11.2 | \$140.00 | \$1,568.00 |
| | Balance Owed this month | | | \$1,568.00 |
| | Previous Balance Owed | | \$3,898.11 | |
| | Total Amount Due and Payable | | | \$5,466.11 |

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

RMI EXP RECOVERABLE LHW
7/1/16 Through 7/31/16

| Category Description | 7/1/16- 7/31/16 | OVERALL TOTAL |
|------------------------------|--------------------|------------------|
| 5100 FEES RMI | | |
| 5300-RECEIVERS FEES | -268.20 | -268.20 |
| 5610-CONTRACT LABOR RMI | -938.55 | -938.55 |
| 5690-RMI OH EXPENSE | -185.50 | -185.50 |
| TOTAL 5100 FEES RMI | <u>-1,392.25</u> | <u>-1,392.25</u> |
| 5150 FEES LEGAL | | |
| 5400-LEGAL FEES | -1,568.00 | -1,568.00 |
| TOTAL 5150 FEES LEGAL | <u>-1,568.00</u> | <u>-1,568.00</u> |
| 5300 EXPENSES | | |
| 6060-RENT | -35.46 | -35.46 |
| 6205-COPIES | -30.40 | -30.40 |
| 6210-POSTAGE | -8.29 | -8.29 |
| 6215-COURIER & OVERNIGHT | -24.46 | -24.46 |
| 6222-TELEPHONE LONG DISTANCE | -4.40 | -4.40 |
| TOTAL 5300 EXPENSES | <u>-103.01</u> | <u>-103.01</u> |
| OVERALL TOTAL | <u>-3,063.26</u> | <u>-3,063.26</u> |

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF KELLY CASHMAN-GRAMS

STATE OF TENNESSEE)
)
COUNTY OF DAVIDSON)

FILED

Date: 8-26, 2016 at 8:25PM
Entered: _____
SUE TOLLETT, CLERK & MASTER
Cumberland County, Crossville, TN
BY: Sue Tollett

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.

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

EXHIBIT

E

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

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

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

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

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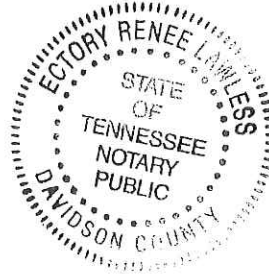
8. Pursuant to the Court's Amended Order Appointing Receiver, I request that the Court approve the fees and expenses, as submitted and supported, and that the Court authorize payment to the Receiver out of receivership estate assets in the amount of said fees and expenses.

FURTHER THE AFFIANT SAITH NOT.

Kelly Cashman Grams
KELLY CASHMAN-GRAMS

Sworn to and subscribed before me this
22nd day of August, 2016.

ECTORY R LUNFESS
NOTARY PUBLIC



My commission expires: 1/9/2018

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

TENNESSEE REGULATORY AUTHORITY

Petitioner,

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Respondent.

No. 2012-CH-560
Chancellor Thurman

AFFIDAVIT OF JEANNE B. BRYANT

STATE OF TENNESSEE)

COUNTY OF DAVIDSON)

FILED

Date: 8-26, 2016 at 8:35 ^{AM} PM

Entered: _____

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

BY: Sue Tollett *jr*

COMES NOW, Jeanne B. Bryant, 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.
2. I am the President 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 July 1, 2016 and July 31, 2016 that are contained in the Receiver's motion.

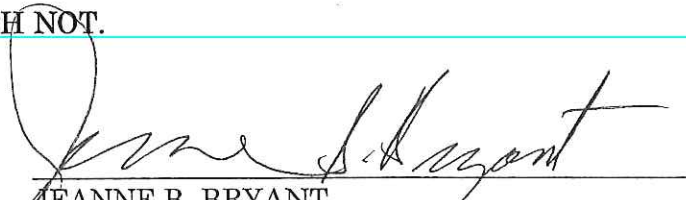
4. I have reviewed all of the fee and expense items for the staff of Receivership Management, Inc. who have performed services to this Receivership, as well as the overhead and operating charges of Receivership Management, Inc. and persons who have contracted with Receivership Management, Inc. to provide 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. 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 \$3,063.26 (i.e., the amount of fees and expenses set forth in the Receiver's Motion).

FURTHER THE AFFIANT SAITH NOT.



JEANNE B. BRYANT

Sworn to and subscribed before me on this
23rd day of August, 2016.



Notary Public

Commission Expires: Jan 6, 2020



Rec.
8-26-16

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

TENNESSEE REGULATORY AUTHORITY

v.

LAUREL HILLS CONDOMINIUMS
PROPERTY OWNERS ASSOCIATION

Docket No. 2012-CH-560
Chancellor Thurman

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 August, 2016, the Receiver petitioned this Honorable Court to approve the Receiver's fees and expenses for July of 2016, and approve payment to the Receiver out of receivership estate assets in the amount 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 \$3063.26, and payment to the Receiver in said amount from the assets of the Laurel Hills Water System in Receivership is hereby **AUTHORIZED**.

ENTERED this ___ day of _____, 2016.

The Honorable Ronald Thurman, Chancellor

TRA v. Laurel Hills Condos POA. – Docket No. 2012-CH-560
Proposed Order Approving Receiver's Fees and Taxing Costs

Chancellor will
sign original on
9-5-16

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

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