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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

In re:

GRIDWORKS LAB, INC., an Oregon
corporation,

Petitioner.

19CV54124

Case No. _____

**PETITIONER’S STIPULATED MOTION
FOR APPOINTMENT OF RECEIVER**

Pursuant to the Oregon Receivership Code codified in Oregon Revised Statutes 37.010 *et seq.* (the “Receivership Code”), and particularly the authority granted to this Court in ORS 37.060(1), petitioner GridWorks Lab, Inc., dba GridWorks IC (“Petitioner”) respectfully moves on a stipulated basis for the appointment of a receiver (the “Stipulated Motion”) to take charge of the Petitioner’s assets and to operate, manage and protect Petitioner’s creditors and clients, pursuant to the Receivership Code except as the Court may otherwise direct in the proposed stipulated order filed herewith.

The Stipulated Motion is supported by Petitioner’s sole secured creditor, Health Share of Oregon, and is therefore advanced on a stipulated basis. The Motion is also supported by the Declaration of C. Ross Peterson in Support of Petitioner’s Stipulated Motion for Appointment of

1 Receiver and the Declaration of Clyde A. Hamstreet in Support of Petitioner's Stipulated Motion
2 for Appointment of Receiver.

3
4 STIPULATED TO BY:

5 **PERKINS COIE LLP**

DAVIS WRIGHT TREMAINE LLLP

6
7 By: /s/ Douglas R. Pahl
8 **Douglas R. Pahl**, OSB No. 950476
9 DPahl@perkinscoie.com
10 1120 N.W. Couch Street, 10th Floor
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11 Attorneys for Petitioner
GridWorks Lab, Inc.

Attorneys for Interested Party
Health Share of Oregon

12 DATED: December 18, 2019

DATED: December 18, 2019

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing **PETITIONER'S STIPULATED MOTION**
3 **FOR APPOINTMENT OF RECEIVER** on the following:

4 Joseph VanLeuven
1300 SW Fifth Ave., Ste. 2400
5 Portland, OR 97201
joevanleuven@dwt.com

6 Attorneys for Interested Party
7 *Health Share of Oregon*

8 to be sent by the following indicated method or methods, on the date set forth below:

9 by **sending via the court's electronic filing system**

10 by **email**

11 by **mail**

12 by **hand delivery**

13 DATED: December 18, 2019

PERKINS COIE LLP

15 By: /s/ Douglas R. Pahl

16 **Douglas R. Pahl**, OSB No. 950476
DPahl@perkinscoie.com
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19 Attorneys for Petitioner
20 *GridWorks Lab, Inc.*