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

In re:)	
)	Case No. 19CV54124
GRIDWORKS LAB, INC., an Oregon)	
corporation,)	
)	
)	RECEIVER’S NOTICE OF INTENT TO
)	COMPENSATE CLYDE A. HAMSTREET &
)	ASSOCIATES, LLC, RECEIVER
Petitioner.)	
)	

NOTICE IS HEREBY GIVEN pursuant to ORS 37.170 and 37.310(6) and paragraph 8 of the Stipulated Order Appointing Receiver entered in the above-referenced case, that Clyde A. Hamstreet & Associates, LLC, Receiver, intends to compensate the Receiver for services rendered to the receivership estate and costs incurred for the period from December 18, 2019 through December 31, 2019. Attached hereto as Exhibit 1 is the Receiver’s itemized statement of fees and costs for that period, totaling \$48,046.75 in fees and \$0.00 in costs and expenses for a total of \$48,046.75.

NOTICE IS FURTHER GIVEN that unless a written objection to approval of the Receiver’s requested fees and costs is filed with the Multnomah County Circuit Court, 1021 SW 4th Avenue, Portland, Oregon 97204, within fourteen (14) days of the date of this notice, and a copy of the objection is served by first class mail upon: (1) Clyde A. Hamstreet & Associates, LLC, Receiver, c/o Maren Cohn, One S.W. Columbia St., Suite 1575, Portland, Oregon 97204, and (2) Susan S. Ford and Sussman Shank LLP, the Receiver’s attorneys, 1000 S.W. Broadway, Suite 1400, Portland, Oregon 97205, the Receiver will pay the amounts set forth on Exhibit 1 without

1 further notice or hearing. If an objection is timely filed, the Court will schedule a hearing to
2 determine the objection.

3 Dated this 14th day of January, 2020.

4 SUSSMAN SHANK LLP

5 By: *s/ Susan S. Ford*

6 _____
Susan S. Ford, OSB No. 842203

7 sford@sussmanshank.com

8 Counsel for Clyde A. Hamstreet & Associates, LLC, Receiver

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*22537-003\RECEIVER'S NOTICE OF INTENT TO COMPENSATE RECEIVER (03354360);1

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One SW Columbia, Suite 1575
Portland, OR 97258
(503) 223-6222

Invoice submitted to:

GridWorks Receivership
One SW Columbia St Suite 1575
Portland, OR 97258

January 09, 2020

Invoice # 2365

Professional Services

		<u>Hours</u>	<u>Amount</u>
12/18/2019	CAH Receivership Duties Review documents and work on communication materials to ride providers; work with Maren Cohn on first day issues. Review and respond to numerous emails.	3.40	1,785.00
	MC Receivership Duties Draft FAQ for Receivership website.	0.40	30.00
	MOC Receivership Duties Continue work on initial provider communication; comment on Health Share provider message and press release; work with Ashley Clark to establish receiver url and website; communication with Jeremy Koehler regarding provider threats to stop service and monitor that situation; participate in employee meeting announcing receivership; work with GridWorks personnel to finalize payment strategy; authorize provider payments; phone call with Haley Rush at KPTV news; phone calls and email with Erin Miller and JD at Metro West to negotiate continuation of service; communications with GridWorks dispatch regarding same; arrange for Hannah Schmidt to be at GridWorks on Friday to work with accounting and data team; arrange for Clyde Hamstreet to work on retention policy with Ross Peterson and identify key personnel categories.	9.80	3,773.00
12/19/2019	HS Receivership Duties Call with Susan Ford and Maren Cohn regarding receivership requirements.	0.60	225.00
	CAH Receivership Duties Work at GridWorks offices; meeting with Ross Peterson. Conference call with Trimet regarding status of case; work with Ross Peterson on retention plan and review list of key people; approve \$150K payment to provider. Number of calls with Maren Cohn regarding case.	3.10	1,627.50
	MOC Receivership Duties Phone calls with Ross Peterson and Charles Hodge regarding provider status, service issues, and preparing for 20% payments; call with Hannah Schmidt and Susan Ford regarding receivership obligations; authorize ACH payments; review provider email; calls with Jenny Maxwell and Luke Payeur regarding retainer to Robert Half for continued temp agent supply; calls with	6.40	2,464.00

		<u>Hours</u>	<u>Amount</u>
	Clyde Hamstreet regarding miscellaneous operational matters; call with Sheri Snyder regarding dispatch status; participate in call with CareOregon and Health Share operational team to discuss Monday provider forum plans; call with Health Share and CO communications team to discuss media coverage and provider issues; multiple calls with Ross Peterson regarding miscellaneous operational matters; call with Charles Hodge regarding provider payments; call with Randy Breedlove to work on setting up VPN for remote email access.		
12/20/2019	HS Receivership Duties Meet with Eryn White and management team regarding receivership and accounting duties. Place phone calls to Radio Cab, Sidra and return call to Trimet.	2.00	750.00
	MOC Receivership Duties Participate in Health Share/CO daily communications check-in; call with San SunOwen regarding Monday operational meeting at GridWorks; call with Ross Peterson regarding same; request provider financial information from staff; review Monday provider meeting email and respond to Charles Hodge; multiple calls and texts with Jeremy Koelher, Hannah Schmidt, Eryn Whyte, Charles Hodge and Todd Fisher to compile October and November provider ride costs and payment information needed by Health Share; authorize 20% payments to providers who committed to provide service; review Oct-Nov provider information and transmit to Health Share; multiple calls with Clyde Hamstreet, Hannah Schmidt, Ross Peterson, and others regarding TriMet, SafeRide, and other various provider and vendor communications issues; respond to provider email; follow up with GridWorks and receiver staff regarding bank accounts, provider meeting, and other ongoing items.	6.50	2,502.50
12/21/2019	CAH Receivership Duties Work on employee retention plans, provide direction regarding payment of severance and discuss control of existing accounts. Advice in other first day questions regarding receivership.	1.90	997.50
	MOC Receivership Duties Multiple communications with Eryn White, Charles Hodge, and Ross Peterson regarding October and November provider services and potential unbilled expense surprises (1.1); call with Ross Peterson regarding same and other operational issues to be addressed (.5); call with Jeremy Koehler relaying information (.3); email to Jeremy Koehler regarding provider agreement and potential fraud issues related to past rides (.2).	2.10	808.50
12/22/2019	CAH Receivership Duties Work on talking points for meeting with providers and go over with Maren Cohn. Review other problems and discuss how best to proceed.	2.20	1,155.00
	CAH Receivership Duties Work with Maren Cohn on various questions and defining plan for communications and operations. Work on retention plans and concerns of Susan Ford.	1.60	840.00
	MOC Receivership Duties Call with Clyde Hamstreet to discuss provider forum and receiver's role in same (.7); review Health Share draft provider communication and provide	3.40	1,309.00

		<u>Hours</u>	<u>Amount</u>
	feedback to Jeremy Koehler (.3); outline provider forum agenda and receiver's bullet points (1.2); respond to email related to Monday morning meetings, follow up with other members of the team needed on Monday; follow up with Susan Ford regarding indemnification needed to proceed, and email Hannah Schmidt regarding plans for accounting department (.9); email regarding CareOregon site visit and system access issues on Monday and review Clyde Hamstreet comments on meeting talking points (.3).		
12/23/2019	CAH Receivership Duties Review documents related to the case; review communication plan with Maren Cohn and various operational issues. Follow up with Hannah Schmidt regarding accounting staff.	2.20	1,155.00
	HS Receivership Duties Meet with Maren Cohn to discuss accounting department. Meet with Kamila Gastao and Taban Yolo to talk about continued operations and additional work related to the receivership requirements.	1.50	562.50
	MC Receivership Duties Attend and take notes at meeting with providers.	2.25	168.75
	MOC Receivership Duties Work with Susan Ford and Monica Martinez at CareOregon on mutually acceptable NDA and indemnification agreement (1.1); meet with various configurations of GridWorks staff and representatives from CareOregon and Health Share to talk through high-level transition plans, work on operational questions and concerns and discuss plans for provider forum (4.8); debrief and work with Ross Peterson and Charles Hodge on transition issues arising from planning meeting (0.7); follow up on email related to multiple operational issues including tech staff retention, staff concerns about the transition plan, status and payment of second Metro West payment, set-up of receiver website, information needed by Ride Connection to initiate provider payments, and other miscellaneous operational issues (2.1); prepare for and lead provider forum (2.5); follow up on email and organize tasks for Tuesday (1.9).	13.10	5,043.50
12/24/2019	CAH Receivership Duties Conference call with Maren Cohn on various matters including operational issues, security issue, and Trimet matter.	0.90	472.50
	MOC Receivership Duties Call with Clyde Hamstreet regarding SafeRide Health termination, First Transit site access and NDA, tech team issues, erroneous payment to provider, vendor communications, and insurance claim issue (0.5); call with Susan Ford regarding First Transit NDA, use of existing bank accounts, creditor notice, other miscellaneous issues and general case status (.5); meeting with Ross Peterson on transition plan, insurance claim issue, mistaken provider payment, SafeRide, miscellaneous vendor payments for current/future services, data retention and wind-down issues, Paradigm litigation, and tech staffing issues (2.0); calls and email with Jeremy Koehler and San SunOwen regarding transition plans and related upcoming issues (.6); respond to email in receiver inbox (1.2); follow up on miscellaneous email related to operational issues and payments questions (0.7); email and text regarding technical assistance needed for transfer of phone numbers	6.30	2,425.50

		<u>Hours</u>	<u>Amount</u>
	and IVR issues (0.2); review and approve ACH payments and email regarding same and review investigation report regarding potential insurance claim (0.6).		
12/24/2019 MC	Receivership Duties Summarizing meeting notes; structuring content for Receivership website	3.00	225.00
12/26/2019 HS	Receivership Duties Read and respond to emails.	0.20	75.00
CAH	Receivership Duties Conference call with Maren Cohn on operational issues, employee retention and provider termination threats, modifications to schedule of GridWorks services. Review and discuss security issue.	2.10	1,102.50
MOC	Receivership Duties Email communications with San SunOwen, Ross Peterson, and Jeremy Koehler regarding transition activities (0.5); call with Clyde Hamstreet regarding status of transition and other receivership matters (0.7); call with Eryn White regarding bank accounts and update of cash forecast (0.2); email and phone calls regarding transition tasks and timeline (0.6); meet with San SunOwen and others from CareOregon to address TriMet fulfillment issues and work through transition period responsibilities and timelines for GridWorks, CareOregon, Health Share, Ride Connection, ComTrans, and First Transit (4.0); call with Clyde Hamstreet regarding insurance claim report and tech team stand up meeting (0.4); work through email inbox responding to various matters and organizing tasks to be completed over the next few days (1.7); email Metro West and AMR regarding continued ALS/BLS service into January (0.3); email Eryn White and Charles Hodge regarding various tasks to complete on Friday (0.3); call with Ross Peterson to review transition plans and get input on several operational and financial matters (0.8).	9.50	3,657.50
12/27/2019 CAH	Receivership Duties Work with Maren Cohn on PTO and ride share issues.	0.40	210.00
HS	Receivership Duties Review cash forecast and read and respond to emails.	0.50	187.50
MOC	Receivership Duties Prepare for and lead tech team stand-up meeting to review transition plans and answer questions (1.2); participate in HSO steering team call regarding contemplated changes to transition plan and related budget concerns (0.7); meet with Paul Rubner about roles and timelines for call center in transition and to address his questions (0.8); work with San SunOwen, CareOregon, and GridWorks teams to deal with various issues related to fulfillment of TriMet passes (2.5); work on issues related to SafeRide Health termination including call with Robbins Schrader, SafeRide CEO, Clyde Hamstreet, and Susan Ford to explore legal options around continued service (1.0); address multiple operational issues and questions related to frozen tech accounts, invoice payments, data exports, banking, asset listing, HR policy announcements, et al. (2.0); work through inbox (1.0).	9.20	3,542.00

		<u>Hours</u>	<u>Amount</u>
12/28/2019	MOC Receivership Duties Call with Matt Alford regarding status of Transit report needed to support Trimet fulfillment and appointment verification process, HIPAA security concerns, and other transition matters (0.5); work on security list and forward to Jeremy Koehler with request to meet with HSO security officer (0.5); read relevant sections of Oregon receivership statute and work on strategy for dealing with SafeRide situation (0.6); review and comment on employee separation agreement (0.2); review and comment on engagement agreement for website development and email instructions for website content development to Martha Cohn (.5); review and add comments and questions to latest transition grid from San SunOwen; email to San SunOwen regarding same and other matters (0.9).	3.20	1,232.00
12/29/2019	HS Receivership Duties Meet with Maren Cohn to review cash forecast and receivership budget.	1.90	712.50
	MOC Receivership Duties Organize notes and tasks for coming weeks and email various Hamstreet and GridWorks team members about needs and responsibilities (1.6); meet with Hannah Schmidt to update budget and cash flow (1.9); review receivership statute provision for executory contracts (0.1); respond to email regarding transition plan (0.2).	3.80	1,463.00
12/30/2019	CAH Receivership Duties Conference call with Susan Ford, Ross Peterson and Maren Cohn regarding Safe Ride's termination notice and the legal position of Receiver regarding 180 days to accept or reject and the inability to cancel for non payment pre-receivership and provided payments post receivership are current. Follow up call with Maren Cohn regarding general case management.	1.30	682.50
	HS Receivership Duties Meet with Maren Cohn, Kamila Gastao and Taban Yolo regarding accounting duties.	0.60	225.00
	MC Receivership Duties Creating and organizing content for receivership website.	1.30	97.50
	MOC Receivership Duties Facilitate CareOregon access to Transit export file and follow up on TriMet fulfillment progress (0.4); participate in utilization management meeting with San SunOwen, Jen Martinek, Robert Freeman, Paul Rubner, and Jenny Maxwell (by phone) (1.0); call with Ross Peterson regarding consulting assistance needed during the transition period (0.5); work with various GridWorks personnel on matters related to systems changes, security concerns, staffing questions, etc. (0.6); work through email to address issues related to transition budget changes, fulfillment, banking and payment questions, PTO and retention questions, and other miscellaneous issues (1.6); participate in call with Aleksandra Vold regarding security issue, follow-up review of notification letter to Health Share and review of Business Associate Agreement (0.5); set up and lead call with Ross Peterson, Susan Ford, and Clyde Hamstreet regarding SafeRide termination response (0.2); meet with Hannah Schmidt, Kamila Gastao, and Taban Yolo regarding asset list, creditor list, and other accounting tasks	7.90	3,041.50

		<u>Hours</u>	<u>Amount</u>
needed for receivership reporting (0.6); conference call with Clyde Hamstreet, Susan Ford, and Ross Peterson regarding SafeRide situation and strategy and follow-up call with Clyde Hamstreet regarding same and status of other matters (1.1); email and phone call with Craig Hill regarding bank account signing authority (0.2); meetings and email with Matt Alford regarding tech issues, security concerns, and likely tasks and employment timelines for tech personnel (1.0); review and respond to email scheduling on-site visits (0.4).			
12/31/2019	HS Receivership Duties Sign signature cards at bank.	0.50	187.50
	MOC Receivership Duties Work with accounting personnel to set up payments and review payroll (0.8); meet with Jenny Maxwell to discuss changes to PTO policy (0.6); text and talk with Cori Walter at First Transit regarding job postings and call center transition plan (0.6); respond to internal email and staff questions, sign documents, and take care of administrative business (2.2); lead management team meeting to discuss transition plans, new denial codes, communications, and miscellaneous matters (1.1); sign signature cards at bank to finalize changes to signing authority (.5); meet with Ryan Frenzel to discuss tasks and employment timeline (.4); review draft materials needed for receivership notice and reporting (asset and creditor lists) and send follow-up emails regarding same (0.3); review Health Share BAA, update internal investigation report, and revise draft notification letter to Health Share (0.7); prepare agenda and meet with San Sunowen for update on transition plans and GridWorks' likely responsibilities in various areas going forward (1.2).	8.60	3,311.00
For professional services rendered		123.65	\$48,046.75
Balance due			<u>\$48,046.75</u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	19.10	525.00	\$10,027.50
Hannah Schmidt - Consultant	7.80	375.00	\$2,925.00
Maren Cohn - Consultant	89.80	385.00	\$34,573.00
Martha Cohn - Jr. Consultant	6.95	75.00	\$521.25

1 CERTIFICATE OF SERVICE

2 I hereby certify that on January 14, 2020 I caused to be served a full and exact copy of the
3 foregoing **RECEIVER NOTICE OF INTENT TO COMPENSATE CLYDE A.**
4 **HAMSTREET & ASSOCIATES, LLC, RECEIVER** on the following persons:

5 Douglas Paul
6 Perkins Coie LLP
7 1120 N.W. Couch Street, 10th Floor
8 Portland, OR 97206
9 Attorneys for Petitioner GridWorks Lab, Inc.

Joseph M. VanLeuven
Davis Wright Tremaine LLP
1300 S.W. Fifth Ave., St. 2400
Portland, OR 97201
Attorneys for Health Share of Oregon

8 C. Ross Peterson
9 GridWorks Lab, Inc.
10 625 S.W. Broadway, Suite 300
11 Portland, OR 97205
12 Interested Party

Kimberley Hanks McGair
Farleigh Wada Witt
121 SW Morrison Street, Suite 600
Portland, OR 97204
Attorneys for First Transit, Inc.

11 by the following indicated method(s):

- 12 First Class Mail, postage prepaid, deposited in the US mail at Portland, OR
13 Hand delivery
14 Facsimile transmission
15 Overnight delivery
16 Email
17 Electronic filing notification

18 Dated: January 14, 2020

19 s/ Susan S. Ford
20 Susan S. Ford, OSB No. 842203