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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 SUSSMAN SHANK LLP,
)	ATTORNEYS FOR 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 Sussman Shank LLP for services rendered to the Receiver and costs incurred for the period from December 16, 2019 through January 13, 2020. Attached hereto as Exhibit 1 is Sussman Shank LLP’s itemized statement of fees and costs incurred in connection with this matter for that time period, totaling \$32,729.00 in fees and \$70.14 in costs and expenses for a total of \$32,799.14.

NOTICE IS FURTHER GIVEN that unless a written objection to the 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

1 Receiver will pay the amounts set forth on Exhibit 1 without further notice or hearing. If an
2 objection is timely filed, the Court will schedule a hearing to determine the objection.

3 Dated this 14th day of January, 2020.

4 SUSSMAN SHANK LLP

5 By: *s/ Susan S. Ford*

6 _____
7 Susan S. Ford, OSB No. 842203
8 sford@sussmanshank.com
9 Counsel for Clyde A. Hamstreet & Associates, LLC, Receiver

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*22537-003\RECEIVER'S NOTICE OF INTENT TO COMPENSATE SLLP (03348020);1

SUSSMAN SHANK^{LLP}

ATTORNEYS

1000 SW Broadway, Suite 1400 | Portland, Oregon 97205

main 503.227.1111 or 800.352.7078 | fax 503.248.0130

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CLYDE A. HAMSTREET & ASSOCIATES, LLC
Clyde A. Hamstreet
One SW Columbia
Suite 1000
Portland, OR 97258

January 14, 2020

Client ID 22537-003 SSF

Statement for period through January 14, 2020

LEGAL SERVICES REGARDING: GridWorks Receivership

Fees	T.K.	Hours	Amount
12/16/19 Telephone conference with Clyde Hamstreet regarding representation in GridWorks receivership (.2) Review and analyze documents provided by client and Gridworks, including Memo of Agreement between GridWorks and HealthShare, draft Receivership Order, draft Declaration of Clyde Hamstreet(2.5); telephone conference with Maren Cohn regarding case background and Hamstreets efforts in past year working with Debtor, initial issue spotting regarding terms of Order; analysis and comparison of Order provisions to Receivership Code, noting elimination of some statutory mandates (.5); Telephone calls (2) with Doug Pahl, attorney for GridWorks regarding proposed changes to Receivership Order (.3); review revised versions of Receivership Order, Memo of Agreement with edits by HealthShare (1.1); follow up conference with Maren Cohn(.3)	SSF	4.90	\$2,572.50
12/17/19 Emails with client and Doug Pahl regarding Receivership Order and Budget (.3);Review and analyze Doug Pahl's markup of draft Receivership Order and further changes as may be needed to protect receiver (1.3); review and analyze proposed Business Associate Agreement providing for indemnification for HIPPA issues and sharing data (.2); telephone conference call with Clyde Hamstreet and Maren Cohn regarding the foregoing (.4); preparation of further edits to Doug Pahl draft Receivership Order after accepting his changes(.8); provide same to client for review and comment(.2)	SSF	3.20	\$1,680.00

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Suite 1000
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Fees		T.K.	Hours	Amount
12/17/19	Review deadline for assumption/rejection of leases under Receivership Code and advise Clyde Hamstreet and Maren Cohn (.2); comment on revised Budget; review and analyze marked version of Order Appointing Receiver prepared by Doug Pahl and emailed comments from Doug Pahl (.5) Review/Revise draft Order and provide same to Doug Pahl (.9) conferences with Maren Cohn and Doug Pahl regarding same (.4); Review/analyze marked version of Order prepared by Joe Van Leuven and consider mandatory statutory provisions to be added (.8) email comments to Doug Pahl and prepare for conference call regarding changes (.6); review and respond to emails regarding appearance at exparte (.2); Attendance at conference call regarding competing versions of Order (.4); further emails from/to Maren Cohn regarding changes to Order, NEMT services agreement (.3); work on additional changes to Order to include mandatory statutory duties of Receiver (.5) provide marked version of Order to Joe Van Leuven and Doug Pahl with additional changes and review/reply to email from Joe Van Leuven (.4); review emails from Joe Van Leuven and Doug Pahl regarding approval of changes to Order and question regarding budget (.10)	SSF	5.10	\$2,677.50
	Discuss receivership order issues with attorney Susan Ford; review receivership order and provide comments to attorney Susan Ford	TWS	0.50	\$262.50
12/18/19	Emails regarding exparte hearing to appoint Receiver (.3); Brief review of copies of pleadings filed in the lawsuit to appoint receiver and signed order (.3); Review several emails from Ross Peterson and Maren Cohn regarding payments to providers in December and draft communication to providers; provide suggested revisions to same (.5); work on draft Indemnification/protective agreement for transition parties to sign prior to working with GridWorks data (.5) email to Maren Cohn requesting clarification of scope of Indemnification Agreement (.1); prepare Key Dates Abstract for Receiver's use in administration of Receivership and email same to Maren Cohn and Clyde Hamstreet (1.0); prepare and revise Receiver's Notice of Intent to Retain Sussman Shank LLP as Counsel for Receiver and email same to Clyde Hamstreet and Maren Cohn (.8)	SSF	3.30	\$1,732.50
	Review business associate agreement; confer with Susan Ford; revise business associate agreement; working group teleconference	VJR	2.10	\$945.00
	Draft Notice of Intent to Retain Sussman Shank for attorney Susan Ford review	MPR	0.40	\$80.00

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Portland, OR 97258

January 14, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
12/19/19 Review multiple emails from Maren Cohn regarding coordination of initial receivership tasks and operations and responses to same (.3); Review indemnity issues in preparation for call with Maren (.3); telephone conference call with Victor Roehm and Maren Cohn regarding content and scope of Business Associate Agreement(.3); coordination of Notice of Retention of Counsel for Receiver (.4) review further emails regarding receivership questions and operational logistics and coordination of call with Maren Cohn and Hannah Schmidt (.2) ; preparation for call and attend to conference call with Maren and Hannah, notes to file regarding same (.7)	SSF	2.20	\$1,155.00
Review and revise Notice of Intent to Employ Sussman Shank to include required disclosures and email to attorney Susan Ford for review	MPR	0.40	\$80.00
Research additional potential conflicts for disclosure	MPR	0.80	\$160.00
12/20/19 Review email and telephone call from Doug Pahl regarding administration of receivership and calls from creditors(.3); return call to attorney Dan Peterson (Broadway Cab) (.1); review news articles regarding Receivership and provide same to Hamstreet working group (.3); email to Maren Cohn coordinating regarding Monday meeting of creditors/providers (.1)	SSF	0.80	\$420.00
Revise certificate of service for Notice of Intent to Retain Sussman; calendar follow up	MPR	0.40	\$80.00
12/21/19 Review email from Maren Cohen regarding Monday meeting attendance and attached final Receiver's letter to providers	SSF	0.20	\$105.00
12/22/19 Review and respond to communication from Douglas Pahl regarding contact from attorney at Farleigh Wada regarding GridWorks receivership; further email from Maren Cohen regarding Monday meeting; review and analyze further detailed emails from Maren Cohen regarding Monday meeting and agendas provided by other participants	SSF	0.30	\$157.50

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January 14, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
12/23/19 Review emails (2) from Maren Cohen and reply to same regarding Non-Disclosure/Indemnification agreement (.3) review draft NDA/Indemnification agreement and revise same to add recitals regarding Receivership, forward same to Maren Cohen for review and comment (.5); review further email from Maren to San Sunowen; review initial comments from Maren on NDA and draft reply email regarding same and increasing scope (.3); telephone conference call with Monica Martinez of Care Oregon and Maren Cohen regarding NDA/Indemnification Agreement (.3); review emailed drafts of NDAs received from Monica Martinez (.3); Review and revise NDA/Indemnification Agreement increasing scope and email to Maren Cohen regarding status (.8); provide draft to attorney Roehm for comment and discussion of need for Protected Health Care safeguards and statutory duties (.4); review revised draft by Victor Roehm; forward same to Maren Cohen with comments (.2);	SSF	3.30	\$1,732.50
review email from Doug Pahl regarding Notice of Representation filed by First Transit; forward same to Maren Cohen with question regarding role with GridWorks; review/analyze reply from Maren describing Lawsuit and how to move forward	SSF	0.30	\$157.50
Confer with Susan Ford; revise business associate agreement	VJR	2.80	\$1,260.00
12/24/19 Review final NDA/Indemnification Agreement/Exhibit A (.1); telephone status conference with Maren Cohen regarding meetings with Health Share, Care Oregon and providers; questions about delegation of task of payment to Ride Connection and advise of potential pitfalls ; issues with providers and a Critical Vendor and discussion of Initial notice of Receivership; First Transit and notes to file regarding same (.5); discuss and review emailed termination notice from Safe Ride Health (.2)	SSF	0.80	\$420.00
12/27/19 Review draft Notice of Receivership; revisions to same (.4); finalize draft and send to Maren Cohn with comments regarding statutory requirements and service (.2); review voicemail message from Kim McGair, attorney for First Transit (.1)	SSF	0.70	\$367.50
Review email from Maren Cohen; reply coordinating time for call; review/analyze "critical vendor" issues under receivership Order and applicable sections of Oregon Receivership Code (8); telephone conference call with Maren Cohen regarding same and "Safe Ride Health" and its unilateral termination of the GridWorks contract (.3); review emails and brief review of contract documents forwarded by Maren Cohn (.2); further email to Maren requesting copies of the Health Share contracts and all amendments, loan agreement, and security documents(.1)	SSF	1.10	\$577.50

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January 14, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
12/27/19 Draft Notice of Receivership for attorney Susan Ford review	MPR	0.40	\$80.00
12/30/19 Review voicemail and emails from Maren Cohn coordinating call with Clyde Hamstreet regarding Safe Ride issues and termination of contract in violation of Receivership Code (.2); Review and analyze (a) Safe Ride letter and email purporting to terminate the contract and (b) Master Services agreement and Exhibits (.8) ; Analysis of issues under Receivership Order, Budget and Receivership Code and confirm analysis in conference with attorney Tom Stilley (.8)	SSF	1.80	\$945.00
Review and respond to email from Hannah Schmidt with question on periodic reports by Receiver(.2); Telephone conference call with Maren Cohn, Clyde Hamstreet and Ross Peterson regarding issues and plan for addressing same regarding SafeRide's post-Receivership notice of termination of executory contract; conduct follow up research on Safe Ride's counsel to determine whom to contact and update to working group regarding same (1.0)	SSF	1.20	\$630.00
12/31/19 Telephone call to Douglas Mintz, attorney for SafeRide regarding termination notice, leaving detailed message with assistant regarding same (.2); telephone call to Kim McGair regarding First Transit lawsuit/stay, leaving detailed message(.1); review voicemail from Maren Cohn and telephone call regarding status of SafeRide contact and discussion of issues regarding First Transit and meeting planned for today regarding transition of services (.2); review email from Hannah Schmidt with question regarding content of Initial Report, and respond to same, attaching Abstract with instructions regarding require content(.2)	SSF	0.70	\$367.50
01/03/20 Review and analyze two emails with accumulated questions regarding Tri Met, Safe Ride situations, and communication from Safe Ride proposing schedule for phasing out services per their purported "termination"; detailed email to Maren Cohn and Clyde Hamstreet regarding same(.8); review and reply to email from Maren Cohn regarding her conversation with Robbins Schrader of Safe Ride (.1)	SSF	0.90	\$472.50
Analyze case scheduled and monitor deadlines for filing reports and other statute requirements	MPR	0.30	\$60.00
01/04/20 Brief review of email from Clyde Hamstreet to Maren Cohn and her reply, discussing receivership issue with GridWorks personnel	SSF	0.20	\$105.00

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Fees		T.K.	Hours	Amount
01/05/20	Review/analyze email from Maren Cohn regarding cyber breach in November by GridWorks and questions about Receiver's control of the attorney-client privilege; complete initial analysis of issues and email same to Maren Cohn(.8) review and analyze email from Maren Cohn attaching communication to Safe Ride CEO and reply to same(.1); brief review of further email from Maren Cohn and email to Kristen Hilton regarding cyber security issue to coordinate review of same (.3)	SSF	1.20	\$630.00
01/06/20	Review/analyze email and attachments from Maren Cohn regarding Metro West issues ; reply email to Maren regarding same (.3); review email from Kristen Hilton and coordinate call with Maren Cohn regarding Cyber Security Data breach; review and analyze email and attachments sent by Maren regarding Cyber Data breach in preparation for call (1.5); review voicemail from Kim McGair, attorney for First Transit and Notice of Appearance in Receivership case (.1); coordinate with Majesta Racanelli (2 emails) regarding incoming documents regarding Cyber Breach and preparation of Notice of Receivership and certificate of service (.4); detailed email to Maren Cohn regarding call and involving Kristen Hilton -- expert in Cyber security ; provide relevant documents to attorney Hilton for review (.3); review several emails from Maren Cohn, Hannah Schmidt regarding website information for Notice of Receivership (.2); Meeting with Kristen Hilton in preparation for call with Maren Cohn regarding Cyber security breach issues (.4); telephone conference call with Maren Cohn, Kristen Hilton (partial) regarding Cyber security issue, insurance and role of receiver vs. Ross Peterson, coordination with counsel and possible coverage of mitigation efforts by insurance; First Transit issues; Notice of Receivership; Metro West email and issue status (.9); brief review of several further emails regarding Cyber breach insurance coverage between Kristen Hilton and Maren Cohn, including budget for payment of self-insured retention (.3)	SSF	4.40	\$2,310.00
	Telephone call from David Criswell and Bruce Cohn regarding their client Metro West and issues about non-;payment of pre-receivership invoices, or disputes about amount of payment of invoices and possible termination of contracts within 24 hours if payment not received (.3); detailed email to Maren Cohn and Clyde Hamstreet regarding same (.3); receive from Maren Cohn and review Metro West "bulk" contract and "demand" contracts (1.0); review email and spreadsheet received from Bruce Cohn; forward same to Maren and Clyde; review email and review spreadsheet sent by Maren Cohn regarding payments, recoupment and timing (.6)	SSF	2.20	\$1,155.00

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January 14, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
01/06/20 Review correspondence regarding data breach investigation; call with attorney Susan Ford and receiver to discuss data breach issues; analyze Cyber insurance policy; exchange calls and emails with attorneys Aleksandra Vold and Adam Greene regarding status and strategy; conference call with receiver and Health Share	KGH	4.80	\$1,824.00
Research taxing authority addresses for certificate of service of Notice of Receivership	MPR	0.40	\$80.00
01/07/20 Telephone call to Kim McGair, attorney for First Transit leaving message (.1) ; email update to Maren Cohn, discussing meeting with First Transit and need to execute NDA protective agreement prior to meeting; review reply (.2); Analyze and prepare memo to Receiver regarding Metro West threatened termination for pre-receivership services and issues regarding breach, executory contract and automatic stay violations(1.9); telephone conference with Kim McGair, attorney for First Transit regarding pending lawsuit, plan for receivership and related matters; update Maren Cohn (.3)	SSF	2.50	\$1,312.50
Emails with Clyde Hamstreet and Maren Cohn regarding memorandum regarding issues with Metro West and violations of Receivership Code (.2); draft letter at Receiver's request to attorneys for Metro West giving notice of violations and intent to pursue remedies in the event of termination and meeting between Health Share and Metro West to resolve issues (1.9); review email from Bruce Cahn requesting status update and forward same to receiver with comments (.2); telephone conference with Maren Cohn regarding edits to letter(.1); review , revise and finalize letter; send same via email to David Criswell and Bruce Cahn (.5)	SSF	2.90	\$1,522.50
Review and reply to email from Maren Cohn regarding proposed responsive email to Robbins Schrader, CEO of Safe Ride regarding withdrawal of termination; email to Maren Cohn regarding status of contents for Notice of Receivership	SSF	0.20	\$105.00
Calls with Adam Greene and Aleksandra Vold regarding data breach and notification; call with receiver to discuss same; review additional emails and other data regarding breach	KGH	1.50	\$570.00

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January 14, 2020

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Fees	T.K.	Hours	Amount
01/08/20 Review email from Maren Cohn regarding staying First Transit suit and review her email exchange with GridWork's attorney; reply to same and review her response regarding go ahead to file notice of automatic stay (.2); coordinate with Majesta Racanelli regarding drafting and timing of requests for compensation by receiver and counsel, notice of receivership and filing notice of stay(.1); review email from GridWorks counsel Roman Hernandez regarding pending federal court lawsuit and notice of stay; detailed reply explaining Receivership Code regarding automatic stay and how to proceed; review his further response regarding next steps (.4)	SSF	0.70	\$367.50
Work on draft motion and notice of automatic stay regarding First Transit lawsuit; review and revise same; email same to Kim McGair and Roman Hernandez requesting permission to indicate it is unopposed; telephone call with Roman Hernandez regarding same	SSF	1.40	\$735.00
Exchange emails with Aleksandra Vold regarding data breach issues; update receiver regarding same; call with Maren Cohn regarding granting data access to Ride Oregon; review and respond to emails with Aleksandra Vold and Adam Greene regarding next steps in handling data breach	KGH	0.80	\$304.00
Research Notice of Stay and draft template for attorney Susan Ford	MPR	0.40	\$80.00
Review district court case and revise Notice of Stay for attorney Susan Ford	MPR	0.30	\$60.00
01/09/20 Review/analyze email and chain forwarded by Joe VanLeuveen, attorney for Health Share regarding proposed amended budget; reply to same and followup with Maren Cohn(.5); review new website information regarding receivership to be included in notice to creditors and interested parties; email comments and question regarding same to Maren Cohn (.3); review email from Kim McGair consenting to motion to stay First transit lawsuit; approve motion for filing(.2); review followup from Maren regarding Paradigm lawsuit; research and download Paradigm Complaint and forward to paralegal Majesta Racanelli to prepare notice of stay (.3); review Order granting motion for recognition of stay issued by Judge You regarding First Transit; provide same to Maren Cohn (.1); telephone conference call with Maren Cohn regarding multiple issues, including the foregoing and several payment issues and insurance non-payment issue for GridWorks employees and advise regarding handling of same, and need to have Safe Ride withdraw termination notice; notes to file regarding next steps from call with Maren Cohn(.7)	SSF	2.00	\$1,050.00

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 Clyde A. Hamstreet
 One SW Columbia
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 Portland, OR 97258

January 14, 2020

Client ID 22537-003 SSF

Fees		T.K.	Hours	Amount
01/09/20	Calls with Aleksandra Vold, Health Share attorneys, and the Receiver regarding data breach	KGH	0.90	\$324.00
	Draft Notice of Receivership and Stay for Paradigm v Gridworks lawsuit and email to attorney Susan Ford for review	MPR	0.30	\$60.00
	Review Paradigm v Gridworks case docket and email to attorney Susan Ford and Maren Judgment of Dismissal	MPR	0.30	\$60.00
	Finalize Notice with Exhibits and file Notice and Motion with District court regarding stay for receivership	MPR	0.30	\$60.00
01/10/20	Review and respond to email from Maren Cohn, Majesta Racanelli regarding Initial Notice of Receivership to creditors, website issue and deadline; review and respond to email from Roman Hernandez regarding ASP arbitration of Paradigm matter; email to Maren Cohn regarding same; further email regarding arbitration from Maren	SSF	0.30	\$157.50
	Coordinate preparation of Notice of Amended Budget	SSF	0.10	\$52.50
	Analyze demand from Health Share regarding data breach notification and remediation efforts; call with Aleksandra Vold to discuss same; email Receiver regarding status and strategy; review draft report to Hiscox and email Aleksandra Vold regarding same	KGH	0.70	\$266.00
	Review Final Creditor list and prepare for mail merge for notice; draft and send email to Maren regarding missing addresses	MPR	0.70	\$140.00
	Review Stipulated Order appointing Receiver and prepare Notice of Revised Budget for attorney Susan Ford	MPR	0.40	\$80.00
01/13/20	Meeting with Majesta Racanelli regarding preparation of Notice of Receivership, master service list, special notice list, Notice of Stay to Arbitration Service of Portland in Paradigm case	SSF	0.20	\$105.00
	Review updates from Hiscox regarding data breach coverage; email receiver regarding same	KGH	0.10	\$36.00

Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
SSF	FORD, SUSAN S.	49.10	\$525.00	\$25,777.50
TWS	STILLEY, THOMAS W.	0.50	\$525.00	\$262.50
KGH	HILTON, KRISTEN G	1.00	\$360.00	\$360.00

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Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
KGH	HILTON, KRISTEN G	7.80	\$380.00	\$2,964.00
VJR	ROEHM, VICTOR J., III	4.90	\$450.00	\$2,205.00
MPR	RACANELLI, MAJESTA P.	5.80	\$200.00	\$1,160.00

TOTAL FEES

\$32,729.00

COSTS AND EXPENSES

Amount

01/14/20 Duplicating Expenses

\$57.30

Long Distance Telephone

\$12.84

TOTAL COSTS AND EXPENSES

\$70.14

TOTAL FEES AND COSTS

\$32,799.14

1 CERTIFICATE OF SERVICE

2 I hereby certify that on January 14, 2020 I caused to be served a full and exact copy of
3 the foregoing **RECEIVER NOTICE OF INTENT TO COMPENSATE SUSSMAN SHANK**
4 **LLP, ATTORNEYS FOR 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 LLLP
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