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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 February 1, 2020 through February 29, 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 \$12,898.00 in fees and \$140.26 in costs and expenses for a total of \$13,038.26.

**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 4<sup>th</sup> 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 16<sup>th</sup> day of March, 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

SUSSMANSHANK.COM

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

March 16, 2020

Client ID 22537-003 SSF  
Invoice No. 84898

## Statement for period February 01, 2020 through February 29, 2020

### LEGAL SERVICES REGARDING: GridWorks Receivership

Fees	T.K.	Hours	Amount
02/02/20 Exchange emails with Maren Cohn regarding security officer	KGH	0.10	\$38.00
02/03/20 Review email regarding status of mitigation efforts regarding data breach and next steps recommended by insurance company	SSF	0.10	\$52.50
Review and analyze emails from Maren Cohn and Kristen Hilton regarding data breach and Ross involvement with Health Share news release and insurance; respond to same; follow up conference with Kristin Hilton regarding next steps; review further emails	SSF	0.40	\$210.00
Emails and calls with Aleksandra Vold to discuss latest communications from Health Share and strategy moving forward; call with Maren Cohen to discuss data breach issues and Ross Peterson; call with Maren Cohen and Aleksandra Vold regarding status and strategy; emails and discussions with attorney Susan Ford regarding strategy relating to data breach; review draft communications from Health Share	KGH	1.80	\$684.00
02/04/20 Review several emails between Maren Cohn and Kristen Hilton regarding Health Share data breach issue and position with Ross regarding press release and related issues; email to Kristen Hilton regarding issues of concern and coordinate meeting(.3); telephone conference with Maren Cohn regarding same; meeting with Kristen Hilton to discuss approach with Health Share (.5); review follow up emails regarding same(.1); further emails from Kristen Hilton and Maren Cohn regarding escalating request for increased budget for data security officer and respond to same (.2)	SSF	1.10	\$577.50
Review and respond to 2 emails from Maren Cohn regarding non-creditor Access 2 Care request for Health Share loan documents	SSF	0.20	\$105.00
Exchange emails with attorney Susan Ford, client, and Aleksandra Vold regarding data breach reporting issues and Ross Peterson; exchange emails with client regarding security officer; due diligence on potential security officers	KGH	0.70	\$266.00
Conference with attorney Susan Ford regarding strategy regarding data breach issues; email client regarding same	KGH	1.00	\$380.00
Telephone call to court clerk regarding Affidavit of Publication; revise and resubmit documents per court request	MPR	0.30	\$60.00

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<b>Fees</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/05/20 Review email communications regarding Health Share press release and GridWorks employee communication; review news reports	KGH	0.30	\$114.00
Return call to Love regarding notice of receivership received	MPR	0.10	\$20.00
02/06/20 Review emails from Maren Cohn regarding data breach and related issues, email from attorney for creditor requesting Health Share loan docs; analyze Receivers duties; telephone call with Maren Cohn regarding same; review and respond to email from Creditor Roman Hernandez	SSF	0.70	\$367.50
Call with client regarding handling media inquiries; review draft response to media inquiry	KGH	0.20	\$76.00
02/10/20 Review email from Maren Cohn with Invoice from Receiver; reply to same regarding filing notices of intent to compensate; coordinate drafting same with Majesta Racanelli(.2); Email to attorney Greg Kelminson with detailed response to his request for Health Share loan agreement(.2); follow up with Maren Cohn regarding status of sale of office equipment; update to Joe VanLeuven regarding same(.2); update Maren Cohn and consider question regarding auction process (.2); review email from Maren Cohn regarding challenges with contemplated auctioneer and respond with identification of issues to consider in retaining auctioneer and provide additional resources for interview process (.3)	SSF	1.10	\$577.50
02/11/20 Draft Notice of Intent to Compensate Receiver and finalize exhibit 1	MPR	0.70	\$140.00
Draft notice of intent to compensate SLLP and email to attorney Susan Ford requesting review of exhibit 1	MPR	0.40	\$80.00
02/12/20 Review and analyze attorney invoice received for services prior to receivership and email Maren Cohn for contact info (.3); review and analyze email from Maren Cohn regarding Tri-Met billing issue; detailed email response with suggestions for further investigation regarding whether Health Share authorized funding to pay prior billing as transaction prior to receivership and related issues (.5); review billing statements and coordination of Notices of Intent to Compensate Receiver and its counsel (.1)	SSF	0.90	\$472.50
Revise notice of intent to compensate Sussman Shank LLP with updated amounts and finalize Exhibit to Notice	MPR	0.20	\$40.00
Review case docket to verify service requirements and any additional notice parties	MPR	0.20	\$40.00

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<b>Fees</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/13/20 Review multiple emails regarding status of data breach and management/investigation of same; review and reply to email from Maren Cohn regarding meeting with Colin Murphy about online auction of personal property assets	SSF	0.20	\$105.00
Review/analyze emails forwarded or received from Maren Cohn (.5); extended conference call regarding multiple issues including Initial Report, Creditor and inventory Lists, and Ride Share issues(1.1); review and analyze list of issues in email from Maren Cohn (.4); review of auction contract and provide detailed email to Maren Cohn regarding suggested changes to same, timing and scheduling issues to sync up with end of receivership (.7) further email with brief responses regarding Other questions discussed on call (.5)	SSF	3.20	\$1,680.00
Review voicemail from "Computer Wholes" regarding data breach; coordinate response with Kristen Hilton regarding same;	SSF	0.40	\$210.00
Conferences with attorney Susan Ford regarding call from individual regarding data breach; receipt of voicemail and call with data breach victim	KGH	0.80	\$304.00
Finalize Notice of intent to compensate SLLP and Clyde A. Hamstreet & Associates and file and serve with court	MPR	0.70	\$140.00
02/14/20 Review and respond to email from First Transit attorney, Kim McGair; update to client regarding same; further review of emails regarding updates to special notice list	SSF	0.30	\$157.50
02/17/20 Review multiple emails from Receiver regarding Initial Report, Inventory and list of creditors ; confer with paralegal Majesta Racanelli regarding same (.6); review and revise Initial Report and send to client for review (.6); email to Joe Van Leuven to obtain Health Share secured debt balance(.1); review two emails regarding Oregon Tort claims act notice and regarding data breach and coordinate conference regarding processing same with attorney Kristen Hilton (.3); review description of intellectual property prepared for GridWorks and provide comments to Maren Cohn (.3)	SSF	1.90	\$997.50
Review correspondence regarding data breach issues	KGH	0.60	\$228.00
Draft Supplemental Certificate of Service for additional Creditors discovered and prepare updated creditor matrix list for attorney Susan Ford review	MPR	0.40	\$80.00

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<b>Fees</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/17/20 Review revised exhibits from Maren Cohn for Statement of Receivers' fees and expenses per deadlines to submit Receiver's initial report (.4); update draft with supplemental information (.3)	MPR	0.70	\$140.00
Update Notice of Creditor list and assets per revisions from Maren Cohen	MPR	0.30	\$60.00
Additional revisions to Notice of Assets and Creditor list from Maren's updates	MPR	0.30	\$60.00
02/18/20 Meeting with Kristin Hilton regarding 2 issues arising from data breach and how to respond to same; update to client	SSF	0.30	\$157.50
Brief review of updated creditor and inventory lists provided by Maren Cohn and email regarding service of same(.3); review and forward information from Joe Van Leuven regarding Health Share secured claim amount and telephone conference call with Maren Cohn regarding same (.3); review revise and finalize Receiver's Initial Report and email to Maren regarding service of same and posting on website(.4); review added language from Maren regarding Health Share indebtedness amount and email regarding same (.2)	SSF	1.00	\$525.00
Strategize with attorney Susan Ford regarding responses to Oregon Tort Claims Notice and pro se request for information; exchange emails with Aleksandra Vold regarding same; advise client regarding substance of response	KGH	0.80	\$304.00
Review updated initial receivership report and finalize with exhibits for attorney Susan Ford	MPR	0.40	\$80.00
Follow up emails to Maren regarding status of Creditor List and Assets	MPR	0.20	\$40.00
Finalize GridWorks Initial report for attorney Susan Ford review with exhibits to be filed with court	MPR	0.60	\$120.00
02/19/20 Review revise and finalize Auction Agreement; review and respond to emails from Maren Cohn regarding same; email proposed auction agreement to Health Share attorney Joe Van Leuven for review and comment; update client	SSF	0.70	\$367.50
Finalize and file initial receivership report and serve on requested notice parties, per SSF request	MPR	0.60	\$120.00
02/20/20 Review several emails from Receiver and follow up regarding same including docketing response deadlines for professional compensation; email creditors list and inventory to Kim McGair for First Transit	SSF	0.60	\$315.00

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<b>Fees</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/20/20 Review email from Maren Cohn and reply regarding employment of auctioneer; review voicemail regarding same issue; review email from Joe Van Leuven approving of form of auctioneer contract	SSF	0.30	\$157.50
Review court notice regarding accepted filings and download court stamped copies for file	MPR	0.30	\$60.00
Draft and send email to Maren court stamped copies of pleadings and clarify response deadlines	MPR	0.20	\$40.00
02/21/20 Coordination with Maren Cohn regarding Employment of Murphy Auctioneers	SSF	0.40	\$210.00
02/25/20 Review and revise notice of intent to employ auctioneer	TWS	0.30	\$157.50
Review and respond to email from Colin Murphy regarding clearing conflicts and application to employ	MPR	0.20	\$40.00
Finalize Notice of Intent and email to Maren for Clyde's signature	MPR	0.30	\$60.00
Finalize Notice of Intent and draft certificate of service and file with Multnomah County Circuit Court	MPR	0.40	\$80.00
Email to Maren status of Notice of Intent and deadlines to respond to be docketed	MPR	0.20	\$40.00
02/26/20 Review and consider email from client regarding document preservation; respond to client questions regarding same	KGH	0.30	\$114.00
Download court stamped copy of notice of intent to retain Auctioneer and email to Maren for website; draft and send email to Colin Murphy with Notice filed with court; calculate and monitor deadline to respond to notice	MPR	0.50	\$100.00
02/27/20 Review and analyze emailed questions (3) from client regarding management and legal requirements regarding records retention on data breach; termination of certain leases and contracts; necessity of Court approval for motions to sell out of ordinary course and timing considerations (1.2); telephone conference call with Maren Cohn regarding same (.5);	SSF	1.70	\$892.50
02/28/20 Analyze demand letter from Aspen; search court filings to determine whether lawsuits have been filed; email Aleksandra Vold and client regarding same	KGH	0.50	\$190.00
Analyze court docket for objections to Notice of Intent to Compensate and review attorney Susan Ford inbox; draft and send email to Maren regarding authorization to pay invoice	MPR	0.40	\$80.00

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<b>Fees</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
02/28/20	Telephone call to Phillip Bennett regarding pending litigation and settlement agreements and possible consent; draft and send email to Maren regarding same	MPR	0.40	\$80.00
02/29/20	Review, analyze and respond to email from Maren Cohn regarding questions about unadministrered third party claims and property	SSF	0.20	\$105.00

### Timekeeper Recap

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
SSF	FORD, SUSAN S.	15.70	\$525.00	\$8,242.50
TWS	STILLEY, THOMAS W.	0.30	\$525.00	\$157.50
KGH	HILTON, KRISTEN G	7.10	\$380.00	\$2,698.00
MPR	RACANELLI, MAJESTA P.	9.00	\$200.00	\$1,800.00

**TOTAL FEES** **\$12,898.00**

### **COSTS AND EXPENSES** **Amount**

02/12/20	CSC CORPORATE SERVICES	\$36.00
02/29/20	Duplicating Expenses	\$74.70
	Long Distance Telephone	\$7.56
	Postage	\$22.00

**TOTAL COSTS AND EXPENSES** **\$140.26**

**TOTAL FEES AND COSTS** **\$13,038.26**

PRIOR STATEMENT BALANCE \$5,959.65



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TOTAL PAYMENTS AND ADJUSTMENTS	-\$5,959.65
CURRENT CHARGES	\$13,038.26
<b>PAY THIS AMOUNT</b>	<b>\$13,038.26</b>

Any Payments Received After 03/16/20 Will Appear on Your Next Statement

### Detail of Payments and Adjustments

Date	Check No.	Description	Amount
03/02/20	12775	Client Payment	\$5,959.65

- Receive your statement electronically:  
Contact: [AccountingGroup@sussmanshank.com](mailto:AccountingGroup@sussmanshank.com)
- We accept Visa, MasterCard, Discover & Amex
- Pay online at: [sussmanshank.com/PayMyStatement](http://sussmanshank.com/PayMyStatement)
- We appreciate your business -----

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2020 I caused to be served a full and exact copy of the foregoing **RECEIVER’S NOTICE OF INTENT COMPENSATE SUSSMAN SHANK LLP, ATTORNEYS FOR RECEIVER** on the following persons:

- |  |   |
|--|---|
| Douglas Paul<br>Perkins Coie LLP<br>1120 N.W. Couch Street, 10 <sup>th</sup> Floor<br>Portland, OR 97206<br>Attorneys for Petitioner Gridworks Lab, Inc. | Joseph M. VanLeuven<br>Davis Wright Tremaine LLLP<br>1300 S.W. Fifth Ave., St. 2400<br>Portland, OR 97201<br>Attorneys for Health Share of Oregon |
| C. Ross Peterson<br>GridWorks Lab, Inc.<br>625 S.W. Broadway, Suite 300<br>Portland, OR 97205<br>Interested Party  | Kimberley Hanks McGair<br>Farleigh Wada Witt<br>121 SW Morrison Street, Suite 600<br>Portland, OR 97204<br>Attorneys for First Transit, Inc.      |
| Greg Kelminson<br>American Medical Response<br>c/o Global Medical Response<br>209 Texas 121 Frontage Rd<br>Suite 21<br>Lewisville, TX 75067              |   |

by the following indicated method(s):

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

Dated: March 16, 2020

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