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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 April 1, 2020 through April 30, 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 \$14,959.50 in fees and \$12.35 in costs and expenses for a total of \$14,971.85.

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 12th day of May, 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 (MARCH 2020) (03431203);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

May 12, 2020

Client ID 22537-003 SSF
Invoice No. 88674

Statement for period April 01, 2020 through April 30, 2020

LEGAL SERVICES REGARDING: GridWorks Receivership

Fees	T.K.	Hours	Amount
04/01/20 Review further email from Maren Cohn regarding additional duties Ross Peterson is undertaking regarding historic claims submissions and updating; review other emails in preparation for telephonic meeting with Joe VanLeuven to discuss the interactions and directives of HealthShare personnel to receiver; update to Maren Cohn	SSF	0.60	\$315.00
Respond to emailed questions and comments from Aleks Vold regarding explanatory initial response to Dept of Business and Consumer Affairs inquiry; provide copy of Receivership Order	SSF	0.30	\$157.50
Review / analyze email from Ingrid Brydolf in response to call to Joe VanLeuven and forward same to client(.2); Telephone call with Maren Cohn regarding call with attorney VanLeuven and Brydolf's questions and concerns, status of providing documents to make demand upon Robert Half Co to return retainer, and quote to propose completing tax return for GridWorks(.7); receive and download documents regarding Robert Half issue (.1)	SSF	1.00	\$525.00
Review and analyze all documents provided by client regarding issue of recovery of unused retainers paid to Robert Half Int'l staffing, including Retainer letter of 12/19/19; prior unsigned contract between GridWorks and RH; and email chain between RH and Jenny Maxwell	SSF	1.40	\$735.00
04/02/20 Detailed email to Maren Cohn with analysis of documents provided regarding Robert Half Int'l staffing regarding retainer issue, and requesting further information prior to composing demand letter(.7); further emails (approximately 4) from and to Maren Cohn regarding her further follow up efforts on Robert Half retainer refund issues(.4)	SSF	1.10	\$577.50
E-mail from and to Jim Howard regarding AWS contract and access	TWS	0.10	\$52.50
04/03/20 Review approximately 7 emails with attachments from Maren Cohn regarding Robert Half retainer issue and consider terms of demand letter; review further email from Maren Cohn forwarding emails that refund of retainer is forthcoming, resolving issue	SSF	0.80	\$420.00

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Fees	T.K.	Hours	Amount
04/03/20 Review detailed voicemail from Maren Cohn regarding HealthShare request for GridWorks payroll records(.1); consider privacy issues and personal identifying information involved(.1); telephone conference with employment partner, Elizabeth Semler regarding privacy issues of employees(.2); review Memorandum of Understanding between GridWorks and HealthShare for inclusion of payroll records as part of agreement and identify compensation arrangements and timeframes for Ross Peterson under MOA(.3); review GridWorks and HealthShare contract to determine types of information subject to being shared and any protections(.3); telephone conference with Maren Cohn regarding privacy issues, payroll, need to understand purpose and relevance of request and then determine what protections are required for employees, discussion of preparation of final accounting and clarifying with Peterson as to any remaining duties and obtain HealthShare consent for payment of any additional services needed(.5)	SSF	1.50	\$787.50
Confer with attorney Susan Ford regarding creditor request for payroll records and response to same	EAS	0.30	\$124.50
04/06/20 Review and analyze email from Maren Cohn with questions regarding retention of Omni to repair leased premises, and recovery of security deposit; review receivership Order and code to determine Receiver's duties and ability to move forward and requirements of same; detailed email to Maren Cohn with recommended approach to same and to include proposal to complete final tax return too, provided that per the Order, the cost of each is covered by HSO budget, and HSO consents to each action; review further detailed email update on status of various efforts from Maren Cohn; reply to same with plan of action and follow-up questions; two additional emails nailing down plan and inquiring about protection of all PHI in the process of moving	SSF	1.20	\$630.00
3 Emails (review, analyze and respond) conferring with Maren Cohn regarding status call with HealthShare tomorrow and PHI concerns	SSF	0.40	\$210.00
Draft and email to accounting requesting March statement for noticing, Review statement for revisions and email to attorney Susan Ford	MPR	0.30	\$60.00

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May 12, 2020

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Fees		T.K.	Hours	Amount
04/07/20	Telephone conference call with Maren Cohn regarding Lease and security deposit issues; Dash Cam sale issues and other issues regarding Health Share and GridWorks and records, security; notes to file regarding same (.9); research regarding sale of dashcams question and detailed email to Maren Cohn with recommendations (.5); Research scope issues regarding Receiver's duties vs. HealthShare's inquiries and expectation of "assurance" of security for pre and post receivership periods, including review and analysis of Health Share/GridWorks contract in the context of the Receivership Order (1.2); confer with attorney Tom Stilley regarding same (.3); update to Maren Cohn (.1); detailed email to Maren Cohn requesting preparation of responses to accumulated questions received from Ingrid Brydolf and review response (.4); review email from Ingrid Brydolf requesting meeting to discuss OHP member data security and preparation of detailed response to same, outlining concern about scope of receiver's duties and role (.4); further emails regarding scheduling conference to discuss (.2)	SSF	3.10	\$1,627.50
04/08/20	Coordination of meeting with Ingrid Brydolf, Health Share and Maren Cohn (.2); review notice of class action lawsuit being filed against Health Share for data breach(.1); review email from Joe Van Leuven regarding permission to utilize funds to prepare final tax return and clean up leased space (.1); confer with Tom Stilley and coordinate response for Maren regarding issues raised by Health Share (.4)	SSF	0.80	\$420.00
	E-mails to and from attorney Susan Ford regarding sharing information with Health Share Oregon; review class action complaint and e-mail to attorney Susan Ford regarding same and possible joint defense agreement	TWS	0.50	\$262.50
04/09/20	E-mail to Ingrid Brydolf and Joe Van Leuven regarding meeting with receiver to discuss outstanding issues	TWS	0.10	\$52.50
04/10/20	Review emails in preparation for call with HealthShare reps and receiver and confer with Tom Stilley regarding same (.5); attend to Call with HealthShare and Maren Cohn, Joe Van Leuven and Ingrid Brydolf(1.0); follow up call with Maren Cohn (.4); review email with landlord and provide additional suggestions to Maren Cohn regarding how to obtain certainty regarding return of deposit(.3)	SSF	2.20	\$1,155.00
	Review and analyze extensive email from Landlord's representative; follow up regarding same with Maren Cohn	SSF	0.50	\$262.50
	Telephone conversation with attorney Susan Ford regarding issues for teleconference between receiver and Health Share's attorneys	TWS	0.30	\$157.50

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Fees	T.K.	Hours	Amount
04/10/20 Review notice of signed order and analyze court docket, download orders entered by judge and email to attorney Susan Ford and to Maren for case record	MPR	0.40	\$80.00
Confer with attorney Susan Ford on Sussman Shank statement and revisions need Draft and send email to accounting requesting update	MPR	0.20	\$40.00
04/13/20 Review Notices of Intent to Compensate and attached billings; emails with Majesta Racanelli regarding same and approving same	SSF	0.30	\$157.50
Draft Clyde A. Hamstreet & Associates Notice of Intent to Compensate and finalize Exhibit for filing for attorney Susan Ford review	MPR	0.40	\$80.00
Draft Sussman Shank LLP's Notice of Intent to Compensate and finalize Exhibit for filing for attorney Susan Ford review	MPR	0.30	\$60.00
Draft certificate of service and confer service information; Finalize and file Notice of Intent to Compensate for SSSLP and Receiver for March and monitor deadlines to object	MPR	0.70	\$140.00
04/14/20 Respond to email from Ava Schoen representing Downtown Development to coordinate call; update to client regarding same(.2); email to client regarding followup items from last week including insurance and report to HealthShare(.1); telephone conference call with Ava Schoen regarding landlord issues, including security deposit, move-out date (.3); telephone conference with Maren Cohn regarding landlord issues, Health Share report (.5); review voicemail and emails from Maren Cohn regarding initial responses to Health Share(.2); coordination of response from Ross Peterson regarding response due to Oregon Dpt of business and consumer affairs(.3)	SSF	1.60	\$840.00
Analyze court ECF notice regarding filings accepted; Download court stamped copies and draft and send email to Maren with copes for website.	MPR	0.30	\$60.00
04/15/20 Review/analyze email string forwarded by Maren Cohn regarding Anne Cohen, counsel to Ross Peterson and timeline for DOJ response, coordination between counsel of response to Dept of Business and Consumer Affairs for state of Oregon; separate email to Maren Cohn regarding impact of extended time for resolution of regulatory inquiry and termination of the receivership; review and respond to email from Aleks Vold regarding same with respect to Hiscox insurance	SSF	0.40	\$210.00

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May 12, 2020

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Fees	T.K.	Hours	Amount
04/15/20 Review email from Joe Van Leuven and attachment prepared by Receiver on budget to actual costs of Receivership for operations, overhead and requesting further detail regarding Ross Peterson salary; reply to Joe VanLeuven; forward to Maren for further action; brief review of report on PHI/data security from receiver to HealthShare and response by HealthShare ED	SSF	0.50	\$262.50
Telephone call from Maren Cohn regarding draft responses prepared to Health Shares inquiries during last week's call; review draft response regarding PHI and data security including charts; review further draft response regarding payments to Ross Peterson during Receivership	SSF	0.50	\$262.50
Telephone conference with Maren Cohn and review previously provided charts to provide input on report requested by HealthShare; review draft Report and provide suggestions for finalizing report; email same to Maren Cohn and list open questions; review further reply emails attaching documents in support of report	SSF	1.20	\$630.00
04/16/20 Review and analyze emails from Maren Cohn regarding separate report and response from receiver's standpoint to Oregon dept of consumer and business affairs; respond to same and agreement with plan, coordination with counsel for Peterson and scheduling call; coordination of call with Aleks Vold	SSF	0.70	\$367.50
04/17/20 Review emails in preparation for call with Betts Patterson attorney and Maren Cohn regarding response to OR Dpt of Consumer and Business affairs inquiry	SSF	0.40	\$210.00
Telephone conference with Maren Cohn regarding her further inquiries into computer issues; report to HealthShare	SSF	0.40	\$210.00
04/20/20 Review voicemail from Maren Cohn; telephone call regarding her conversation with Health Share about taking down server from GridWorks leased premises and possible solution to deal with Ross Peterson assertions of attorney client privilege and how to move issue forward through possible Receivership court order	SSF	0.40	\$210.00
Review emails from Aleks Vold in preparation for call regarding Receiver's possible response to DOJ inquiry; telephone conference call with Aleks Vold, Maren Cohn regarding same; followup call from Maren regarding input from Clyde Hamstreet and determination not to do separate Receiver response and to make report in the Receiver's final report and motion to terminate receivership	SSF	0.80	\$420.00

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Fees	T.K.	Hours	Amount
04/20/20 telephone conference with Maren Cohn regarding Robert Half refund of money held in trust as "conversion fee" for a temporary employee later hired by First Transit; brief review of email with Robert Half Agreement	SSF	0.20	\$105.00
Review/ analyze further email from JoeVanLeuven regarding Health Share position regarding landlord and security deposit; review and analyze email from Ava Schoen, attorney for landlord and authorities cited in email regarding landlords position that it has a security interest in the deposit and will retain it to compensate for breach of lease by rejection; forward same to Maren Cohn; followup with Majesta Racanelli to do UCC check for financing statement by landlord	SSF	1.10	\$577.50
Research landlord entity name via Oregon Secretary of State and perform UCC Search via CSC for all liens; draft and send email to attorney Susan Ford with search summary	MPR	0.40	\$80.00
04/21/20 Review/analyze draft email from Maren Cohn on device report/investigation efforts; reply email to Maren Cohn regarding same	SSF	0.20	\$105.00
04/22/20 Review draft email by Maren Cohn regarding missing computer report to Health Share, and reply to same with suggested edits(.3); reply to email from Ava Shoen regarding security deposit issue on Downtown Development lease (.1);detailed email regarding Downtown development security deposit to Joe Van Leuven and Ingrid Brydolf summarizing issue and requesting feed back, providing copy of lease (.3)	SSF	0.70	\$367.50
04/23/20 Review email from Maren Cohn to Health Share attorneys regarding final information from Receiver regarding device 0001; reply to Maren Cohn regarding same	SSF	0.10	\$52.50
Review "General conditions of Assignment" provided by Robert Half "office team" and analyze applicability to GridWorks' situation and First Transit; detailed email to Maren Cohn regarding same	SSF	0.30	\$157.50
04/28/20 Email to Health Share attorney Joe VanLeuven regarding lease issues and requirements of receivership order; review/analyze response to same	SSF	0.30	\$157.50
Analyze court docket for objections to Notice of Intent to compensate and email to Maren Cohn copies of statements submitted for payments	MPR	0.30	\$60.00
04/29/20 Review and respond to 3 emails received from Maren Cohn regarding lease issues with landlord Downtown Development Group	SSF	0.30	\$157.50
04/30/20 Telephone conference with Maren Cohn regarding status of lease/security deposit dispute with landlord and Health Share; dispute with Robert Half regarding conversion fee and multiple emails (3) regarding same	SSF	0.70	\$367.50

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May 12, 2020

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Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
SSF	FORD, SUSAN S.	26.00	\$525.00	\$13,650.00
TWS	STILLEY, THOMAS W.	1.00	\$525.00	\$525.00
EAS	SEMLER, ELIZABETH A.	0.30	\$415.00	\$124.50
MPR	RACANELLI, MAJESTA P.	3.30	\$200.00	\$660.00

TOTAL FEES **\$14,959.50**

COSTS AND EXPENSES **Amount**

04/30/20	Duplicating Expenses	\$4.35
	Postage	\$8.00

TOTAL COSTS AND EXPENSES **\$12.35**

TOTAL FEES AND COSTS **\$14,971.85**

PRIOR STATEMENT BALANCE	\$29,923.62
TOTAL PAYMENTS AND ADJUSTMENTS	-\$29,923.62
CURRENT CHARGES	\$14,971.85
PAY THIS AMOUNT	\$14,971.85

Any Payments Received After 05/12/20 Will Appear on Your Next Statement

TRUST/RETAINER ACCOUNTING

Date	Check No.	Description	Amount
		Prior Trust Balance	\$0.00

SUSSMAN SHANK^{LLP}

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TRUST/RETAINER ACCOUNTING

Date	Check No.	Description	Amount
04/29/20	WIRE	Deposit in Trust- Gridworks Lab Inc	\$29,923.62
04/30/20	7613	Apply Trust to A/R	-\$29,923.62
		BALANCE IN TRUST/RETAINER	\$0.00

Detail of Payments and Adjustments

Date	Check No.	Description	Amount
05/08/20	7613	Apply Trust	\$29,923.62

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

1 CERTIFICATE OF SERVICE

2 I hereby certify that on May 12, 2020 I caused to be served a full and exact copy of the
3 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: May 12, 2020

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