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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 May 1, 2020 through May 31, 2020. Attached hereto as Exhibit 1 is the Receiver’s itemized statement of fees and costs for that period, totaling \$22,456.39 in fees and \$68.80 in costs and expenses for a total of \$22,525.19.

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 11th day of June, 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 RECEIVER (APRIL 2020) (03454290);1



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

June 8, 2020

Invoice # 2392

Professional Services

	<u>Hours</u>	<u>Amount</u>
5/1/2020 MOC Receivership Duties Address multiple miscellaneous administrative matters including communications with Kamila Gastao about status of credit card refund, amount owed, and winding down credit card account, paying invoices and taking care of banking items, dealing with GridWorks mail and related follow-up, and changing the billing on the Google account (2.3); respond to email from Sonitrol regarding ladder left at GridWorks and work with property manager and building engineer to coordinate locksmith visit (0.4); review email from Luke Payeur, communicate with Jenny Maxwell regarding prior agreements with Robert Half, and discuss conversion fee issue with Clyde Hamstreet (0.3); request delegated account access to search Jenny Maxwell's email for Robert Half correspondence (0.2); call with Susan Ford regarding next steps on site clean-up and Robert Half issues (0.1).	3.30	1,270.50
CAH Receivership Duties Work with Maren Cohn regarding issues with Robert Half, American Express card and other building clean up and landlord matter. Discuss potential class action suit and remaining computer equipment to auction.	1.40	735.00
5/4/2020 MOC Receivership Duties Take care of administrative email, invoices, and banking matters, including multiple emails with Kamila Gastao regarding invoice and banking items; call with Kamila Gastao regarding wind down of credit card account, and call with Ross Peterson regarding future G-Suite use and potential for consulting firm lease issues (2.3); call with Lyn O'Brien regarding email account reactivation, research Jenny Maxwell email regarding Robert Half conversion fee issue, and forward emails to Susan Ford for evaluation (0.9); review and respond to email from Jason Dykeman regarding AWS account status (0.1).	3.30	1,270.50
5/5/2020 MOC Receivership Duties Email Craig Hill at Beneficial Bank regarding ACH approvals and account monitoring, and take care of other banking matters (0.2); email with GridWorks and Health Share data and tech team members regarding project status (0.3); call with Susan Ford regarding next steps on office site and lease (0.3); call with Ross Peterson regarding status of records custody agreement and next steps with G-Suite access (0.2); open returned mail	2.20	847.00

	<u>Hours</u>	<u>Amount</u>
and email GridWorks accounting team regarding forwarding address for former employee (0.1); review and follow up on data/records storage email (0.2); handle miscellaneous administrative and accounting-related email (0.6); email Stacey Hansen regarding site repair and clean-up questions (0.3).		
5/7/2020 MOC Receivership Duties Email with Kamila Gastao and Greg Sparhawk regarding VisibilEDI invoice, review billing history on VisibilEDI account and review outstanding check register (0.4); follow-up email regarding computer retrieval and dash cams (0.1); review files to prepare for call with Kamila Gastao (0.1); call with Kamila Gastao to follow up on VisibilEDI invoice history and create action plan for list of outstanding checks (0.4); call with Greg Sparhawk regarding VisibilEDI account and payment history and provide email update and instructions to Kamila Gastao (0.2); review updated cash flow from Felicia Muli and discuss revisions (0.2); process ACH payments (0.1); call with Mike Moberg regarding status of 2019 and 2020 tax returns (0.1); review revised cash flow and transmit file to Health Share (0.3); call with Lyn O'Brien to discuss erasing and recalling computers from George Milliner and Manushi Vakharia and changing Ross Peterson G-suite access (0.2); follow up email with Ross Peterson, George Milliner, and Manushi Vakharia regarding same (0.2); email Jason Dykeman et al. regarding any upcoming needs from Lyn O'Brien before he leaves on vacation (0.1); email Susan Ford regarding lease status and planning for final receiver's report (0.1).	2.50	962.50
5/8/2020 MOC Receivership Duties Research mileage reimbursement information and respond to Nancy Thompson at Health Share regarding member grievances (0.4); call with Ross Peterson regarding removal from G-Suite folders (0.2); follow up with Lyn O'Brien to ask that he remove Ross Peterson from Google Drive and make arrangements to pick up erased computer (0.1); review mail and email, forward to appropriate parties for follow-up and take care of invoices and other administrative matters such as return of computers, review of check register, coordination of access changes to G-Suite, and reply to notice from SAIF (1.2); call Standard Insurance to question May billing and outstanding balance and follow up with email to Kamila Gastao (0.6); respond to other email from Health Share representatives regarding GridWorks claims filing and mileage reimbursement program (0.2); review materials and respond to email relating to outstanding checks, return of computer, contractor and other invoices (0.3); respond to email from Susan Ford about damage to the GridWorks premises during the receivership (0.2).	3.20	1,232.00
5/11/2020 MOC Receivership Duties Review and respond to administrative email related to final invoices and cancellation of services, straightening out benefits charges, asking accounting team to look into ADP payroll tax deductions and questions regarding the April bill register, March and April financial statements, review of draft tax returns, and question to counsel regarding Sonitrol contract termination (1.7); email to HSO data team regarding G-Suite access (0.2); review Sussman Shank invoice for April (0.1); take care of ACH approvals and banking (0.2)	2.20	847.00

		<u>Hours</u>	<u>Amount</u>
5/12/2020	HS Receivership Duties Review 2019 tax returns.	0.20	75.00
	MOC Receivership Duties Review and respond to administrative email related to invoices, account terminations and cancellations, and status of data transfer and access (0.8); email Susan Ford regarding Bigleaf and Sonitrol terminations, respond to email from Joe VanLeuven regarding site repairs and revise Martha Cohn's letter to vendors regarding contract terminations (1.5); email Felicia Muli regarding review of bill registers for closure of accounts (0.3); call SAIF regarding amount of recent invoices (0.3); email accounting group regarding follow-up on tax returns (0.2); request Martha Cohn to go through unemployment claims and follow up with Kamila Gastao (0.1); call with Troy from Atlasta Lock (0.1); check on American Express account and follow up with Matt Alford and Kamila Gastao regarding Datadog charge (0.2).	3.50	1,347.50
	MC Administrative Services Prepare checks and letters to be sent out. Review employment records.	1.20	90.00
5/13/2020	MOC Receivership Duties Work with Martha Cohn on checks to vendors with final payments and letters explaining non-payment of pre-receivership amounts and termination fees (0.8); work through approximately 20 emails relating to final invoices and accounts needing to be terminated, research status and next steps for each to build out and update tracking spreadsheet, then circulate to GridWorks shut-down team for input and to take over specific tasks (2.8); miscellaneous communications relating to site clean up, tax return review, credit card accounts, domain names, return of computers, etc. (0.4); respond to email from Nancy Thompson regarding Bento reimbursement checks, prepare and sign checks, and work out address correction (0.3); call with Susan Ford regarding communications about termination fees and plans to let third-party litigation drop (0.2); call with Lyn O'Brien regarding return of Bigleaf equipment (0.2); contact American Express regarding post-freeze and disputed charges, obtain payoff balance and invalidate credit card (0.9); review bank register and updated cash flow from Felicia Muli, add additional information, obtain bank balances and send to Health Share (0.4); finalize payment and letter to Sonitrol and respond to miscellaneous other administrative email (0.8).	6.80	2,618.00
5/14/2020	MOC Receivership Duties Email with Susan Ford and Joe Vanleuven regarding settlement with landlord (0.1); communications with George Milliner and Lyn O'Brien about erasing and shipping back George's computers (0.3); process other miscellaneous email (0.3).	0.70	269.50
5/15/2020	MOC Receivership Duties Process returned mail (0.2); review and respond to email regarding unemployment insurance claims and accounting items (0.3); update Google account payment method, email Felicia Muli and Kamila Gastao about outstanding task status (0.3); pay SAIF invoice, follow up on Ring Central communications, and work on list of accounts and outstanding invoices for estimate of remaining wind-down costs (2.3); review March and April financial statements and email Eryn White regarding same (0.7).	3.80	1,463.00

		<u>Hours</u>	<u>Amount</u>
5/15/2020	MC Receivership Duties Prepare checks and letters to be mailed.	0.80	60.00
5/18/2020	MOC Receivership Duties Prepare for and participate in call with Lyn O'Brien, Kamila Gastao, and Eryn White to review list of accounts for which final invoices may be expected or credits are due and to ensure closure (1.2); follow up from call by updating spreadsheet and related financial information (0.8); review contractor invoices and email Kamila Gastao to set up ACH payments (0.1).	2.10	808.50
5/19/2020	CAH Receivership Duties Work with Maren Cohn regarding termination of office lease and several wind-down issues	0.40	210.00
	MOC Receivership Duties Contact accounting team and Matt Alford regarding need for SharePoint access and set up call with Eryn White regarding financial statements (0.2); check bank account and process email related to banking matters, outstanding checks, and posting of documents on website (0.2); review and comment on lease termination agreement from Susan Ford (0.1); call with Matt Alford regarding progress obtaining final invoices and closing accounts, with follow-up email to Jason Dykeman and Lyn O'Brien regarding next steps (0.5); text with Kamila Gastao and take care of ACH payments (0.1); review invoice from Felicia Muli (0.1); email Felicia Muli and Kamila Gastao about ACH payment, bank reconciliation, and cash flow (0.1); review and approve changes to lease termination agreement (0.1); process mail related to former employees (0.3); call with Lyn O'Brien regarding return of Bigleaf equipment and actions needed for account closures, including downloads of data, event logs and billing information (0.2); call with Eryn White to go over March and April financial statements, and follow-up email related to Slack refund (0.6); discuss several wind-down issues with Clyde Hamstreet including lease termination agreement, resolution of third party litigation, and estimate of final expenses (0.4).	2.90	1,116.50
	MC Administrative Services Cross reference employment records. Cut and mail checks.	0.80	60.00
5/20/2020	MOC Receivership Duties Call with Ross Peterson regarding several matters including review of tax returns, status of DOJ response, and case update (0.4); forward draft tax return to Ross Peterson for review, email Manushi Vakharia and George Milliner regarding return of computers and reimbursement (0.2); email Susan Ford regarding lease termination agreement (0.1); monitor email and pay Verizon invoice (0.3); process administrative email related to reimbursement for computer shipping expenses and payments to consultants (0.2); review and comment on draft response to Oregon DOJ inquiry (0.6).	1.80	693.00
	MC Administrative Services Cross reference employment records. Cut and mail checks.	0.80	60.00
5/21/2020	HS Receivership Duties Review March and April financials and 2019 cash flow statement.	0.50	187.50

		<u>Hours</u>	<u>Amount</u>
5/21/2020	CAH Receivership Duties Review financial statement through April.	0.40	210.00
	MOC Receivership Duties Review March financials with Hannah Schmidt and Clyde Hamstreet (0.2); review April financial statements with Hannah Schmidt (0.1); review 2019 cash flow statement and email Eryn White regarding same and assistance supervising transition of workload from Kamila Gastao to Martha Cohn (0.2); review status of account closures and final invoice information, update spreadsheet, and communicate with Kamila Gastao regarding work priorities (0.6); email Felicia Muli and Kamila Gastao regarding bank reconciliation and updating cash sheet through last week (0.1); email Kamila Gastao with additional tasks, email SAIF representative regarding 10-day policy reinstatement, take care of banking items including ACH payments, checks, and downloading transactions to send to Kamila Gastao for bank reconciliation (0.5); complete review of response to Oregon DOJ regarding security breach and send back to counsel (0.2); research American Express billing reconciliation issue for Kamila Gastao and reply to email (0.4); review redline of Oregon DOJ response and reply to email (0.2); research additional Bento card issues for Nancy Thompson at Health Share (0.6); work with Lyn O'Brien to gain admin access to Microsoft account, review user license situation and change billing to US Bank account (0.3); process miscellaneous administrative email (0.4); review revised lease agreement and email Susan Ford regarding same (0.1); email Sharlei Hsu about DOJ response (0.2).	4.10	1,578.39
5/22/2020	MOC Receivership Duties Review and make additional suggestions for Oregon DOJ response and return to Sharlei Hsu (0.2); review and adjust updated cash spreadsheet received from Felicia Muli, add information related to estimated payments and income/refunds, and transmit to Aaron Gillingham at Health Share (0.9); follow-up call with Aaron Gillingham and file review (0.3).	1.40	539.00
5/23/2020	MOC Receivership Duties Email with Eryn White regarding ADP and Sage invoices and further adjustments to March financials.	0.40	154.00
5/25/2020	MOC Receivership Duties Review cash spreadsheet and prepare actual to budget comparison through April.	1.20	462.00
5/26/2020	MOC Receivership Duties Attend to banking matters (0.2) and administrative email (0.2); review March financial statements (0.2); review and modify April actual to budget comparison and send to Health Share with financial statements (1.2).	1.80	693.00
5/27/2020	MOC Receivership Duties Follow up on American Express account dispute activity and work with Ross Peterson to gain full management authority (0.4); download US Bank activity and email with cash sheet to Felicia Muli for updating (0.2); prepare for call with Kamila Gastao to transfer her responsibilities to Martha (0.4); respond to email from Erin Ross and Megan Brophy related to transition matters (0.2); call with Kamila Gastao and Martha Cohn regarding transition of Kamila's duties to Martha Cohn, and follow up with email (0.6); discuss likely	2.10	808.50

		<u>Hours</u>	<u>Amount</u>
	timing of shutting down accounting systems with Hannah Schmidt and respond to email from Sage Intacct regarding past due invoice (0.3).		
5/27/2020 MC	Administrative Services Call with Kamila Gastao regarding transfer of tasks.	0.40	30.00
5/28/2020 MOC	Receivership Duties Follow up email related to Sage invoice (0.2); follow up with American Express on disputed Datadog charges and related email (0.6); final review and execution of lease termination (0.2); meet Lyn O'Brien to hand over three more computers for erasure (0.3); work with Kamila Gastao to transition her tasks to Hamstreet & Associates personnel (0.9).	2.20	847.00
MC	Accounting Meet with Kamila Gastao to go over transitioning accounting tasks.	1.20	90.00
5/29/2020 MOC	Receivership Duties Process administrative business, mostly relating to banking, and follow up on status of outstanding invoices and refunds (0.9); review updated weekly cash sheet and send to Health Share (0.4); update device status spreadsheet and send email to HSO team regarding status of GridWorks devices and accounts and plans to finalize the transfer to Health Share (0.5); email to Susan Ford regarding letter to third party litigants seeking mutual release of claims (0.1).	1.90	731.50
MC	Accounting Enter and post bills. Create ACH and checks. Fill out benefit audit and other employment paperwork.	1.20	90.00
For professional services rendered		62.70	\$22,456.39
Additional Charges :			
		<u>Price</u>	<u>Qty</u>
5/1/2020	Ready talk conference call service.	\$68.80	1 68.80
Total additional charges			\$68.80
Total amount of this bill			\$22,525.19
Accounts receivable transactions			
5/29/2020	Payment invoice 2386- Thank You. Check No. 1015		(\$51,990.05)
Total payments and adjustments			(\$51,990.05)
Balance due			<u><u>\$22,525.19</u></u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	2.20	525.00	\$1,155.00
Hannah Schmidt - Consultant	0.70	375.00	\$262.50
Maren Cohn - Consultant	53.40	385.00	\$20,558.89
Martha Cohn - Jr. Consultant	6.40	75.00	\$480.00

1 CERTIFICATE OF SERVICE

2 I hereby certify that on June 11, 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: June 11, 2020

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