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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 May 1, 2020 through May 31, 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 \$6,365.00 in fees and \$26.55 in costs and expenses for a total of \$6,391.55.

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 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 SLLP (MAY 2020) (03478122);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

June 11, 2020

Client ID 22537-003 SSF

Statement for period May 01, 2020 through May 31, 2020

LEGAL SERVICES REGARDING: GridWorks Receivership

Fees	T.K.	Hours	Amount
05/01/20 Review voicemail from Maren Cohn regarding lease and turnover of possession questions; telephone call with Maren Cohn regarding same; review and analyze basis of landlord's rights under lease and receivership code; detailed email to HealthShare attorneys regarding considerations for resolution of open issues with landlord, and confirming surrender of premises,	SSF	0.70	\$367.50
05/04/20 Review email from Maren Cohn forwarding email from landlord agent regarding complaints about premises cleaning and repair; reply to same with recommendations; review email from Joe Van Leuven regarding same; review and reply to further email from Maren Cohn regarding Robert Half conversion fee	SSF	0.40	\$210.00
05/05/20 Telephone call from Maren Cohn regarding response to landlord and follow up with Landlord's counsel; including HealthShare's position; review email from Maren Cohn to landlord and discuss same	SSF	0.40	\$210.00
05/07/20 Review email from Maren Cohn with further communications regarding leased premises; reply to same with recommendations	SSF	0.10	\$52.50
05/08/20 Review and reply to email from Ava Schoen regarding landlord counteroffer; update to Joe Vanleuven and client regarding same; review further email from Ava Schoen regarding question regarding Receiver's "control" over Peterson Consulting Co., ; review additional email from Ava Schoen regarding alleged administrative claim for damages; emails with Maren Cohn (2) regarding same	SSF	0.70	\$367.50
05/11/20 Review and edit Notice of Intent to compensate; emails with Majesta Racanelli regarding same	SSF	0.30	\$157.50
Review email from Maren Cohn regarding repairs/landlord issue;detailed email to Joe Van Leuven regarding same; review follow up email from Maren Cohn	SSF	0.30	\$157.50
05/12/20 Review email from Joe Van Leuven regarding repairs/landlord issue and reply to same(.1); review email from Maren Cohn regarding "contract termination" billings and reply to same discussing further need for info as to whether these have underlying executory contracts and rejection process	SSF	0.40	\$210.00
Review/approve Notices of Intent to Compensate and related emails to Majesta Racanelli	SSF	0.20	\$105.00

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Clyde A. Hamstreet
One SW Columbia
Suite 1000
Portland, OR 97258

June 11, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
05/12/20 Draft certificate of services and finalize exhibit 1 to Sussman Shank Notice of Intent to compensate; finalize pleadings and file with court	MPR	0.60	\$120.00
05/13/20 Telephone call with Maren Cohn regarding dealing with "contract termination fee" notices and other matters relating to creditors inquiries; emails with Joe Van Leuven and Maren Cohn regarding negotiations with landlord	SSF	0.30	\$157.50
05/14/20 Review response to settlement offer from Ava Schoen, attorney for Downtown Development Inc.; followup email to Joe Van Leuven to confirm approval to proceed; review further email from Van Leuven to Schoen confirming terms; draft email to Schoen and Van Leuven confirming scope of release covers GridWorks, the Receiver and the receivership estate; 3 additional emails between Health Share counsel and client regarding preparation of settlement document and payment, timing; email to HealthShare and landlord attorneys confirming scope and terms of proposed resolution and preparation of Lease Termination and Release agreement	SSF	0.80	\$420.00
05/15/20 Coordination with Jordan Manley regarding drafting Lease Termination Agreement and Release	SSF	0.50	\$262.50
Telephone call with attorney Susan Ford regarding lease termination and release agreement; review lease, amendment to lease and assignment of lease documents; draft lease termination and release agreement; email attorney Susan Ford enclosing agreement	JEM	1.80	\$477.00
05/18/20 Review and revise draft Lease Termination Agreement; send to Maren Cohn for review and approval	SSF	0.90	\$472.50
Review court acceptance notice and download Notice if Intent to Compensate for April 2020, Draft and send email to Maren with court filed documents	MPR	0.30	\$60.00
05/19/20 Review emailed comments regarding lease termination agreement from Maren Cohn; reply to same(.2); emails with Jordan Manley regarding edits to agreement(.2); telephone conference regarding same(.3)	SSF	0.70	\$367.50
Review redline changes to Lease Termination agreement; send same to Maren Cohn for final review/approval	SSF	0.30	\$157.50
Review email regarding signatory to lease termination and provisions regarding off-set against security deposit; email attorney Susan Ford regarding the same; telephone call with attorney Susan Ford regarding security deposit provisions; revise lease termination; email attorney Susan Ford enclosing revised lease termination and redline	JEM	0.70	\$185.50

SUSSMAN SHANK LLP

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

June 11, 2020

Client ID 22537-003 SSF

Fees	T.K.	Hours	Amount
05/20/20 Email revised draft lease termination agreement to Joe van Leuven for review and comments; review/approve changes with client and finalize agreement; email to Jamee Asher and Ava Schoen with proposed final Agreement	SSF	0.60	\$315.00
05/22/20 Review approximately 8 emails regarding GridWorks response to Oregon Dept. Consumer Affairs inquiry	SSF	0.40	\$210.00
draft/review/analyze 2 emails regarding status of Lease Termination and Release Agreement	SSF	0.20	\$105.00
05/26/20 Review and analyze email from Maren Cohn with question about landlord's addition of default language to Lease Termination Agreement; detailed reply regarding same, outlining options(.4); telephone call from Maren Cohn regarding same(.1); telephone call to Ava Schoen, leaving message regarding "default" language review and respond to further call from Ava Schoen(.2); telephone conference with Ava Schoen regarding redline and receiver's additional requested changes (.3)	SSF	1.00	\$525.00
05/27/20 Review and analyze email form Jamee Asher and Ava Schoen with further revisions to Lease termination agreement; review and reply to client comments regarding same	SSF	0.40	\$210.00
05/28/20 Review email from Jamee Asher regarding proposed changes to agreement; forward to Maren Cohn for review/acceptance; review response from Maren and coordinate forwarding signature to Downtown Development Group with Majesta Racanelli and ACH payment;	SSF	0.40	\$210.00
Follow up with Majesta Racanelli regarding whether deadline for objections to fees has run	SSF	0.10	\$52.50
Review email from Maren regarding signature on Lease Termination agreement and download documents; draft and send email to Ava and Jamee with signature	MPR	0.30	\$60.00
Review Notice of Intent to Compensate and email to attorney Susan Ford and client deadlines	MPR	0.20	\$40.00
Review court docket for objections to Notice of Intent to compensate and email to Maren and attorney Susan Ford	MPR	0.20	\$40.00
05/29/20 Review and respond to email from Jamee and Ava regarding signed Lease Termination and download for file;	MPR	0.20	\$40.00
Draft and send email to Maren regarding signed termination lease agreement and payment instructions	MPR	0.20	\$40.00

SUSSMAN SHANK LLP

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

June 11, 2020

Client ID 22537-003 SSF

Timekeeper Recap

T.K.	Name	Hours	Rate	Amount
SSF	FORD, SUSAN S.	10.10	\$525.00	\$5,302.50
JEM	MANLEY, JORDAN E.	2.50	\$265.00	\$662.50
MPR	RACANELLI, MAJESTA P.	2.00	\$200.00	\$400.00
TOTAL FEES				\$6,365.00
COSTS AND EXPENSES				Amount
05/13/20	CSC CORPORATE SERVICES			\$21.00
05/31/20	Duplicating Expenses			\$5.55
TOTAL COSTS AND EXPENSES				\$26.55
TOTAL FEES AND COSTS				\$6,391.55

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 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: June 11, 2020

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