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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 July 1, 2020 through July 31, 2020. Attached hereto as Exhibit 1 is the Receiver’s itemized statement of fees and costs for that period, totaling \$15,522.00 in fees and \$0.00 in costs and expenses for a total of \$15,522.00.

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 14th day of August, 2020.

4 SUSSMAN SHANK LLP

5 By: *s/ Susan S. Ford*

6 _____
Susan S. Ford, OSB No. 842203

7 sford@sussmanshank.com

8 Counsel for Clyde A. Hamstreet & Associates, LLC, Receiver

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*22537-003\RECEIVER'S NOTICE OF INTENT TO COMPENSATE RECEIVER (JULY 2020) (03521080);1

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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

August 11, 2020

Invoice # 2400

Professional Services

		<u>Hours</u>	<u>Amount</u>
7/1/2020	MC Accounting Research uncashed ADP checks.	1.20	90.00
7/2/2020	MOC Receivership Duties Process miscellaneous email relating to collections and administrative matters.	0.50	192.50
	MC Accounting Post and pay invoices.	1.00	75.00
7/3/2020	MOC Receivership Duties Provide guidance to Martha Cohn regarding billing and invoice matters and authorize ACHs (0.4); respond to administrative email and work with Lyn O'Brien and Martha Cohn on account access issues (0.3); make additional edits to Matt Alford's report on intellectual property and send to Jeff Anderson at Consor for review (0.3).	1.00	385.00
7/6/2020	MOC Receivership Duties Provide banking and cash flow information to Martha Cohn, review cash flow and transmit to Health Share (0.8); review signed tax forms and task Martha Cohn with preparing checks and filing by mail (0.4); call with Eryn White and Martha Cohn to review outstanding accounting matters (0.4); call with Jeff Anderson and Pierce Urban of Consor IP regarding potential value of GridWorks IP (0.1).	1.70	654.50
	MC Accounting Perform weekly bank reconciliations and cash flows, participate in call with Eryn White on various accounting loose ends.	2.00	150.00
7/7/2020	MOC Receivership Duties Pick up GridWorks computer from Eryn White and drop off with remaining computers at Health Share (1.0); review and respond to miscellaneous email, including messages to Lewis Rife regarding severance claim, Ross Peterson and Aleks Vold regarding Health Share third-party lawsuit, and Standard regarding Jan-March life insurance (0.6).	1.60	616.00

		<u>Hours</u>	<u>Amount</u>
7/7/2020	MC Accounting Monitor inboxes of prior Gridworks accounting staff. Post and pay invoices.	0.70	52.50
7/8/2020	MOC Receivership Duties Call with Ross Peterson regarding several outstanding matters including intellectual property analysis, insurance policy deductible, Slack refund, and cancellation of AmEx card (0.5); send follow-up emails related to topics discussed with Ross Peterson (0.1); call with Lyn O'Brien to check on status of computer erasures and auction company pick-up of remaining equipment (0.1); email Colin Murphy with questions about the final auction (0.2); email to Eric Mirieter of TriMet regarding refund (0.2).	1.10	423.50
7/13/2020	MOC Receivership Duties Analyze auction list and remaining equipment to determine whether additional motion is needed (0.4); phone call and email exchanges with Colin Murphy regarding upcoming auction of remaining GridWorks equipment (0.1); discuss auction issues with Clyde Hamstreet and email Susan Ford regarding same (0.3); email Susan Ford regarding efforts to collect Slack refund from Gaven Singh (0.1); process other administrative email related to GridWorks financial matters (0.2); research and respond to phone call and email from Nancy Thompson about Bento reimbursements (0.5).	1.60	616.00
	CAH Receivership Duties Discuss auction issues with Maren Cohn.	0.20	105.00
7/14/2020	MOC Receivership Duties Assign tasks to Martha Cohn regarding email responses, process banking items, and respond to email from Nancy Thompson.	0.40	154.00
	MC Accounting Perform weekly bank reconciliations and cash flows. Post and pay invoices. Attempt to contact Verizon's customer service to obtain refund.	2.50	187.50
7/15/2020	MOC Receivership Duties Follow up on miscellaneous outstanding items relating to collections, invoices, and final auction of GridWorks equipment (0.8); review updated cash flow and send to Health Share with bank balances (0.7); call with Hiscox representative, GridWorks defense counsel, and Ross Peterson regarding third party lawsuit issues (0.4); follow-up call with Ross Peterson regarding same (0.2); discuss litigation, insurance, and wind-down issues with Clyde Hamstreet (0.2); call American Express to arrange for refund of credit balance (0.2); communications with Lyn O'Brien and James Murphy representatives regarding computer erasure and final auction details (0.2); respond to miscellaneous email (0.2).	2.90	1,116.50
	CAH Receivership Duties Discuss termination issues with Maren Cohn including Healthcare litigation, date to wrap up receivership and payment of insurance coverage for breach.	0.40	210.00
7/16/2020	MOC Receivership Duties Review Baker Hostetler invoices and email Susan Ford regarding agenda for call (0.2); call with Susan Ford to coordinate response to email from Joe VanLeuven and plan for termination of receivership (0.8); call with Matt	3.30	1,270.50

		<u>Hours</u>	<u>Amount</u>
	Alford regarding status of Transit server and text Ross Peterson regarding BAA with Impremis (0.2); research and compile spreadsheet with remaining anticipated collections and payments (1.2); calculate remittance amount subtracting for services prior to December 1 and arrange for wire to Baker Hostetler (0.3); draft responses to questions from Joe VanLeuven and send to Clyde Hamstreet for review (0.6).		
7/17/2020	MOC Receivership Duties Work on memo regarding value of intellectual property, discuss draft email response with Clyde Hamstreet, finalize and send to Joe VanLeuven.	1.20	462.00
	CAH Receivership Duties Review draft emails from receiver to Health Share. Discuss loss of stay with Maren Cohn. Approve payment to defense counsel regarding data breach claims.	0.60	315.00
	MC Accounting Respond to email from Eryn White, write check for ADP uncashed payroll.	0.30	22.50
7/20/2020	MOC Receivership Duties Email exchanges with Gaven Singh regarding Slack refund (0.5); check bank balances and download transactions to send to Martha Cohn for cash file update (0.1); process miscellaneous email (0.3); discuss intellectual property memo and other aspects of winding down the receivership with Clyde Hamstreet (0.4).	1.30	500.50
	CAH Receivership Duties Review memo on intellectual property and discuss prospects of finding buyer with Maren Cohn, the cost to find a buyer and limited if any value of property. Discuss ways to bring receivership to close, protecting insurance coverage and final tax returns outside receivership.	1.30	682.50
	MC Accounting Post and pay invoices. Begin weekly bank reconciliations and cash flow management. Respond to employment department and other mail.	1.80	135.00
7/21/2020	MOC Receivership Duties Follow up on questions from Joe VanLeuven and respond to his email (1.1); work on memo related to intellectual property, including additional research into aspects of report from Matt Alford (2.4); review updated cash flow and send with bank balances to Health Share (0.2); research and update anticipated payment and receipts spreadsheet (0.2); email former GridWorks fulfillment employees regarding Bento card matter raised by Nancy Thompson (0.3); process miscellaneous email (0.4); respond to email from Nancy Thompson and follow up with reimbursement check to member (0.2); call with former fulfillment employees regarding Bento reimbursement to member, and respond to email from Nancy Thompson regarding same (0.3).	5.10	1,963.50
	MC Accounting Finish cash flows. Write check.	0.20	15.00

		<u>Hours</u>	<u>Amount</u>
7/22/2020	CAH Receivership Duties Review draft report to Health Share regarding value of IT work. Discuss problem of erasing data on remote server without contract.	1.40	735.00
	MOC Receivership Duties Follow up on miscellaneous issues including locked out computer sold at auction, information needed to complete intellectual property memo, erasure of Transit server located in Texas, and status of information needed from Ross Peterson (0.6); review and supplement Matt Alford's intellectual property report and prepare it for sharing with Health Share (1.1); discuss IP memo with Clyde Hamstreet and make suggested revisions (0.7); call with Lee Roder regarding erasure of Transit server and draft follow-up email to Health Share (0.6).	3.00	1,155.00
	MC Accounting Monitor former accounting employees' email inboxes. Manage issue with auction computer. Write and post checks.	0.80	60.00
7/23/2020	MOC Receivership Duties Call with Felix Citron at ADP regarding outstanding invoices and lack of assistance/response from ADP, call and follow-up email with Colin Murphy regarding auction results, research Bento card issue for Nancy Thompson and reply to email.	0.30	115.50
7/24/2020	MOC Receivership Duties Research and respond to email from Jason Dykeman about problems with access to Okta and Gsuite accounts; calls and email with Lyn O'Brien regarding same.	1.40	539.00
7/26/2020	MOC Receivership Duties Email Eryn White regarding expiration of Okta service; research requirements for receiver's final report and request assistance from Eryn White in preparing the receiver's final report; email Martha Cohn regarding same.	0.40	154.00
7/27/2020	MOC Receivership Duties Email Jason Dykeman regarding Okta license and AWS root account information (0.1); email IHC and Wapato regarding plans to purchase dash cams (0.2); other miscellaneous email (0.2); communications with Colin Murphy, Lyn O'Brien, and Jason Dykeman regarding removal of Cisco Meraki devices from GridWorks account (0.2); call with Susan Ford regarding steps to wind down and terminate the receivership (0.6).	1.30	500.50
	MC Accounting Post invoice, respond to mail.	0.20	15.00
7/28/2020	MOC Receivership Duties Download bank transactions and process ACH (0.2); review and build out updated cash flow and transmit to Health Share (0.5); research and respond to inquiries from Aaron Gillingham (0.6); communications with Gaven Singh and Slack regarding status of Slack refund (0.3); email with Hiscox representatives and counsel regarding cyber policy and status of response to third party lawsuit (0.2).	1.80	693.00

	<u>Hours</u>	<u>Amount</u>
7/28/2020 MC Accounting Perform weekly bank reconciliations and cash flow updates; post and pay invoices.	0.80	60.00
7/29/2020 MOC Receivership Duties Call Susan Ford regarding forwarding insurance policy to Health Share (0.1); email Rich Valladares regarding third party claim defense and sharing policy with Health Share (0.2).	0.30	115.50
7/30/2020 MOC Receivership Duties Review email from Susan Ford regarding reinstatement of automatic stay (0.1); respond to email from Megan Brophy and Maggie Bennington-Davis regarding lingering GridWorks matters (0.6); call with Eryn White and Martha Cohn to coordinate final receivership reporting (0.3); further email with Matt Alford and HSO personnel related to list of items raised by Megan Brophy for follow-up (0.6); status call with Clyde Hamstreet regarding AWS and other matters (0.2); call with Susan Ford regarding receivership wind-up matters and next steps (0.7).	2.50	962.50
MC Accounting Call on final receivership reporting with Maren Cohn and Eryn White.	0.30	22.50
For professional services rendered	48.40	\$15,522.00
Accounts receivable transactions		
8/10/2020 Payment Invoice 2396- Thank You. Check No. 1031		(\$16,594.40)
Total payments and adjustments		(\$16,594.40)
Balance due		<u>\$15,522.00</u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	3.90	525.00	\$2,047.50
Maren Cohn - Consultant	32.70	385.00	\$12,589.50
Martha Cohn - Jr. Consultant	11.80	75.00	\$885.00

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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2020 I caused to be served a full and exact copy of the foregoing **RECEIVER NOTICE OF INTENT TO COMPENSATE CLYDE A. HAMSTREET & ASSOCIATES, LLC, RECEIVER** on the following persons:

Douglas Paul Perkins Coie LLP 1120 N.W. Couch Street, 10 th Floor Portland, OR 97206 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
C. Ross Peterson GridWorks Lab, Inc. 8950 SW Midea Ln Portland, OR 97225 Interested Party	Kimberley Hanks McGair Farleigh Wada Witt 121 SW Morrison Street, Suite 600 Portland, OR 97204 Attorneys for First Transit, Inc.

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: August 14, 2020

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