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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 July 1, 2020 through July 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 \$5,692.50 in fees and \$3.00 in costs and expenses for a total of \$5,695.50.

**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 14<sup>th</sup> 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 SLLP (JULY 2020) (03502307);1

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# SUSSMAN SHANK <sup>LLP</sup>

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

August 11, 2020

Client ID 22537-003 SSF  
Invoice No. 92902

## Statement for period July 01, 2020 through July 31, 2020

### LEGAL SERVICES REGARDING: GridWorks Receivership

Fees	T.K.	Hours	Amount
07/01/20 Analysis of issues and emails with Maren Cohn regarding (a)additional auction items and whether additional sale notice needed; and (b) completion of tax return	SSF	0.50	\$262.50
07/08/20 Analyze Complaint received with claims of HealthShare against Gridworks and analyze potential automatic stay issue; review email from Joe Van Leuven regarding status of receivership; detailed email to Maren Cohn regarding same	SSF	0.40	\$210.00
07/09/20 Review voicemail from Maren Cohn; return call leaving detailed message	SSF	0.20	\$105.00
Review voicemail from Maren Cohn; Return call and leave detailed message; telephone call with Maren Cohn regarding all remaining property to be liquidated and strategies to expedite closing receivership; detailed email update to Joe Van Leuven regarding same	SSF	0.80	\$420.00
Detailed email to Joe Van Leuven reporting on status of Receivership	SSF	0.20	\$105.00
07/13/20 Review, analyze and respond to 2 emails from Maren Cohn regarding (a) recovery of money owed by former employee; and (b) proceeding with auction	SSF	0.30	\$157.50
07/15/20 Review email from Maren regarding invoice for June; email to attorney Susan Ford regarding status of Sussman Invoice; request information from accounting for Notice of fees	MPR	0.30	\$60.00
07/16/20 Review message from Maren Cohn and analyze stay issue; telephone call with Maren Cohn regarding email from Joe Van Leuven and coordinating response	SSF	0.70	\$367.50
Follow up with attorney Susan Ford on status of statement review	MPR	0.20	\$40.00
Draft Notice of Intent to Compensate Receiver for June and finalize Exhibit for attorney Susan Ford review	MPR	0.40	\$80.00
07/17/20 Analyze list of detailed questions received from Joe Van Leuven and responses by Maren Cohn; analyze and draft detailed response to question regarding impact of Health Share Third party complaint against Gridworks and the receivership; telephone conference with Maren Cohn regarding same including confirming tender of defense to Hiscox; review brief response to email from Joe Van Leuven	SSF	1.80	\$945.00

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<b>Fees</b>	<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
07/17/20 Review and coordinate filing notices of intent to compensate	SSF	0.20	\$105.00
Draft and send email to Maren Cohn with Sussman Shank's June statement for review	MPR	0.20	\$40.00
Review complaint filed and served against Gridiworks, calculate and calendar deadline to answer	MPR	0.30	\$60.00
Draft Notice of Intent to Compensate Sussman Shank LLP for June 2020 and finalize exhibit; draft and send documents to attorney Susan Ford for review	MPR	0.40	\$80.00
Finalize Notice of Intent to Compensate Sussman and Clyde Hamstreet and file with court and process for mailing	MPR	0.60	\$120.00
07/21/20 Calculate deadline to object and monitor	MPR	0.20	\$40.00
07/24/20 Review emails exchanged between Maren Cohn and Joe Van Leuven; further email to Maren Cohn requesting status meeting	SSF	0.20	\$105.00
07/27/20 Review email and coordination of call with Maren Cohn regarding wrap up plan for Receivership and remaining items to complete prior to termination; preparation for call; review multiple emails exchange with Joe Van Leuven to identify remaining issues and HealthShare positions on same; conference call with Maren Cohn regarding same	SSF	1.90	\$997.50
Review and respond to email from Maren regarding status of June Fee statements	MPR	0.20	\$40.00
Review Court notice and download court stamped Notice of Intent to Compensate; Draft and send court copies to Maren	MPR	0.20	\$40.00
07/28/20 Review email from Ingrid Brydolf to Maren Cohn requesting policy of insurance; confirm deadline for answer to complaint	SSF	0.10	\$52.50
07/30/20 Review email from Court requiring status report in First Transit case; email to Kimberly McGair attorney for First Transit regarding consent to reinstatement of stay; review reply and further inquiry about status of receivership and IP being sold; detailed reply to same; update to Receiver	SSF	0.50	\$262.50
Review emails from defense counsel and receiver regarding response to HealthShare attorney request for insurance policy	SSF	0.20	\$105.00

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Portland, OR 97258

August 11, 2020

Client ID 22537-003 SSF  
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<b>Fees</b>		<b>T.K.</b>	<b>Hours</b>	<b>Amount</b>
07/30/20	Conference call with Maren Cohn regarding multiple issues including Paradigm dash cams; lost sim card and AWS account; not reinstating stay (.8); call from Randy Arthur at Bullivant regarding insurance policy for third party complaint by HS against gridworks(.1); follow up with Health Share attorney Joe Van Leuven regarding various issues, calendar follow up items (.3)	SSF	1.20	\$630.00
07/31/20	Review emails and voicemail from Joe VanLeuven; telephone conference call with Joe regarding Paradigm and AWS issues and reinstating automatic stay; follow up with client regarding same	SSF	0.50	\$262.50

### Timekeeper Recap

<b>T.K.</b>	<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
SSF	FORD, SUSAN S.	9.70	\$525.00	\$5,092.50
MPR	RACANELLI, MAJESTA P.	3.00	\$200.00	\$600.00

**TOTAL FEES** **\$5,692.50**

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

07/31/20 Duplicating Expenses \$3.00

**TOTAL COSTS AND EXPENSES** **\$3.00**

**TOTAL FEES AND COSTS** **\$5,695.50**

PRIOR STATEMENT BALANCE \$1,961.25

CURRENT CHARGES \$5,695.50

**PAY THIS AMOUNT** **\$7,656.75**

Any Payments Received After 08/11/20 Will Appear on Your Next Statement

# SUSSMAN SHANK<sup>LLP</sup>

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

August 11, 2020

Client ID 22537-003 SSF  
Invoice No. 92902

## Detail of Prior Statement Balance

Invoice Date	Invoice Number	Amount Billed	Balance Due
07/19/20	91405	\$1,961.25	\$1,961.25

- Receive your statement electronically:  
Email: [accounting@sussmanshank.com](mailto:accounting@sussmanshank.com)
  - We've updated and improved our online payment service:  
[sussmanshank.com/PayMyStatement](http://sussmanshank.com/PayMyStatement)
- We appreciate your business. Thank you! -----

1 CERTIFICATE OF SERVICE

2 I hereby certify that on August 14, 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, 10<sup>th</sup> Floor  
Portland, OR 97206  
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 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.

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: August 14, 2020

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