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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 August 1, 2020 through August 31, 2020. Attached hereto as Exhibit 1 is the Receiver’s itemized statement of fees and costs for that period, totaling \$13,329.00 in fees and \$48.15 in costs and expenses for a total of \$13,377.15.

**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 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 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 15<sup>th</sup> day of September, 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

September 9, 2020

Invoice # 2405

Professional Services

		<u>Hours</u>	<u>Amount</u>
8/3/2020	MOC Receivership Duties Review email from Susan Ford regarding automatic stay and status report in First Transit litigation and respond to email from Ross Peterson regarding same.	0.70	269.50
8/5/2020	MOC Receivership Duties Follow up with various parties on outstanding receivership matters, including banking and cash flow, status of Transit server, invoices and collections, and communications with Health Share.	1.20	462.00
	MC Accounting Going through mail. Perform weekly accounting reconciliations and tasks. Begin response to US Census.	1.80	135.00
8/6/2020	MC Accounting Take care of mail and employment paperwork. Begin reconciliation of life insurance invoices.	1.30	97.50
8/7/2020	MOC Receivership Duties Process accumulated email, including preparing for conversation with Gaven Singh regarding efforts to recover Slack refund (0.9); review and revise updated cash flow and transmit to Health Share (0.5).	1.40	539.00
	MC Accounting Reconcile The Standard invoices.	1.30	97.50
8/10/2020	MOC Receivership Duties Work on correct calculation of amount owed to The Standard for life insurance (0.4); email to Gaven Singh and Lee Roder regarding outstanding issues related to Slack refund and Transit erasure (0.2); email Martha Cohn regarding payment to professionals (0.1); email Susan Ford regarding setting up status call on outstanding matters and develop agenda regarding same (0.4); review and process accumulated email (0.5); work with Martha Cohn on invoices (0.2); call with Susan Ford regarding to-do list prior to termination of receivership (1.3); review subpoena for records and respond to email regarding same (0.2); email to Susan Ford regarding abandonment	3.50	1,347.50

		<u>Hours</u>	<u>Amount</u>
	of third-party claims (0.1); review and forward redacted Hiscox policy to Health Share (0.1).		
8/10/2020 MC	Accounting Write checks, post invoices, do weekly bank reconciliations, take care of mail, review The Standard accounting.	2.30	172.50
8/11/2020 MOC	Receivership Duties Draft and send email to Amanda Turley at The Standard with premium calculation and invoice payment proposal (0.7); email Lee Roder regarding call and research payment issue (0.1); update spreadsheet tracking outstanding invoice and collections items (0.7); research and prepare list of items to be completed prior to termination of receivership and draft agenda for call with Health Share (1.1); review and make revisions to updated cash file and transmit to Health Share with bank balances (0.4); call with Lee Roder regarding Transit erasure options and update status document accordingly (0.4); call with Gaven Singh regarding Slack refund and update status sheet accordingly (0.5); review Susan Ford's edits to list of pre-termination tasks, revise list, discuss with Susan, and circulate to Health Share group (0.8).	4.70	1,809.50
MC	Accounting Set up new receipts and payments. Finish cash flows.	0.50	37.50
8/12/2020 MOC	Receivership Duties Take care of miscellaneous banking matters (0.3); review email related to Thursday call with Health Share team (0.1); call with Susan Ford regarding AWS account pleading and handling of administrative claims as part of receivership termination (0.3); respond to email from Amanda Turley regarding The Standard payment amount (0.1); email and texts related to finding information to respond to a subpoena of member records (0.2); review draft AWS motion from Susan Ford and respond with comments (0.1).	1.10	423.50
8/13/2020 MOC	Receivership Duties Prepare for and participate in call with Susan Ford and Health Share group (1.1); follow-up communications with Lyn O'Brien and Lee Roder regarding erasure of Transit server using Blancco program (0.3); respond to email related to location of subpoenaed member records (0.1); call with Susan Ford to discuss response to First Transit litigation inquiry and email to Lyn O'Brien regarding Transit erasure (0.4); process email related to a garnishment order and OR Dept of Revenue balance due (0.1).	2.00	770.00
MC	Accounting Sort through and respond to mail and garnishment.	0.50	37.50
8/17/2020 MOC	Receivership Duties Email Lee Roder regarding Transit erasure process and cost (0.1); text and call with Lyn O'Brien regarding access to Kamila's Gastao email account and Blancco program status (0.1); email Eryn White regarding help needed preparing to terminate receivership (0.3); email Roger Keto of Eastside Mobile Mechanics regarding picking up Paradigm SD cards (0.1); review auction sale lists and send to Eryn White for use in completing fixed asset accounting on financial statements (0.2); email exchanges with Ross	1.70	654.50

		<u>Hours</u>	<u>Amount</u>
	Peterson and Health Share regarding response to subpoena of member records (0.3); email exchange with Susan Ford regarding Health Share to-do list (0.3); email related to pick-up of dash cams and SD cards from Paradigm office (0.2); email related to subpoena (0.1).		
8/18/2020	MOC Receivership Duties Communications with Martha Cohn and Health Share to arrange pickup and delivery of dash cams and SD cards from Paradigm (0.6); miscellaneous administrative email regarding subpoena of member records, Gmail account access, tax information, et al., and banking tasks (0.4); prepare for and lead call with Martha Cohn and Eryn White regarding accounting questions and tasks (0.6)	1.60	616.00
	MC Accounting Drive to Salem and pick up dashcams; return to Portland and deliver to HealthShare. Perform regular weekly accounting. Participate in call with Eryn White and Maren Cohn about final tasks.	4.40	330.00
8/19/2020	MOC Receivership Duties Review email from Martha Cohn and Eryn White related to financial statement updates and final receivership reports (0.2); review and revise declaration for AWS motion (0.2); review updated cash flow and transmit to Health Share (0.3); miscellaneous email (0.3).	1.00	385.00
8/20/2020	MOC Receivership Duties Communications with Martha Cohn and Eryn White regarding status of Oregon tax account (0.1); email with ADP regarding account authorizations and The Standard regarding employee life insurance accounts (0.1); communications with Lyn O'Brien and Lee Roder regarding status of Transit erasure (0.1).	0.30	115.50
	MC Accounting Set up ACH and create checks. Sort and respond to mail.	1.30	97.50
8/21/2020	CAH Receivership Duties Review list of issues delaying the conclusion for the receivership primarily the insurance coverage for security breach, personal property tax, and prior error in state income tax return.	0.40	210.00
	MOC Receivership Duties Catch up on office mail, sign check, and discuss Quadiant postage meter charge with Martha Cohn (0.1); review pleadings from Susan Ford regarding AWS account access and provide comments (0.4); email ADP regarding account authorization (0.2); discuss personal property tax, Oregon tax, and Slack refund issues with Clyde Hamstreet(0.3); call with Susan Ford regarding AWS pleadings and Oregon and county tax issues (0.4); continue revision of AWS pleadings (1.0); assemble asset-related information and provide to Martha Cohn with instructions for receiver's final report (0.4).	2.80	1,078.00
	MC Accounting Sort invoices, cut checks, respond to mail.	0.40	30.00

		<u>Hours</u>	<u>Amount</u>
8/24/2020	MOC Receivership Duties Miscellaneous email and banking.	0.30	115.50
	MC Accounting Find and list information requested by The Standard. Set up invoices and cut checks. Begin bank reconciliations.	1.30	97.50
8/25/2020	CAH Receivership Duties Review personal property tax matter with Maren and support her decision.	0.30	157.50
	MOC Receivership Duties Review, print and sign declaration in AWS account matter (0.2); review, research, and respond to email from Amanda Turley regarding The Standard invoice matter (0.2); review updated cash flow and transmit to Health Share with bank balances (0.2); review and respond to email from Susan Ford regarding Multnomah County personal property tax filing and email Clyde Hamstreet about next steps (0.2); call and leave message with Lee Roder regarding status of Transit erasure (0.1); process miscellaneous email related to account access and other wind-up matters (0.2); call American Express regarding re-charge of disputed amount (0.4); follow up with Gaven Singh regarding Slack refund (0.1).	1.60	616.00
	MC Accounting Finish weekly bank reconciliations and cash flows. Discuss fixed asset lists with Maren Cohn.	0.50	37.50
8/26/2020	MOC Receivership Duties Email related to litigation hold letter from Greenberg Traurig, American Express statement, and The Standard invoice (0.3); email Ross Peterson regarding Multnomah County tax issue and other matters needing his cooperation (0.6); email Susan Ford regarding preparation of and payment for tax returns (0.2); pay AmEx invoice and email Beneficial Bank to allow the charge (0.1); call with Susan Ford about several matters including 2020 tax return engagement, Multnomah County personal property taxes, records preservation notice received in Health Share vs. GridWorks matter, need for cooperation from Ross Peterson on various matters, auction process for intellectual property, and status of dash cam retrieval, Slack refund and erasure of Transit server (0.9); finalize detailed email to Ross Peterson requesting his assistance on tax and other matters (0.4); read litigation hold notice from Greenberg Traurig, forward to other Hamstreet team members who may possess GridWorks records, and ask for input regarding preservation of email (0.4); respond to email from paralegal at Greenberg Traurig (0.1).	4.00	1,540.00
	MC Accounting Look into American Express payment.	0.20	15.00
8/27/2020	MOC Receivership Duties Process email and help Martha Cohn locate information to respond to Pacific Automation inquiry (0.2); call and follow-up texts with Erin Ross regarding wrap-up of miscellaneous email and IT matters (0.4); call with Ross Peterson regarding wrap-up matters needing his cooperation and	1.10	423.50

		<u>Hours</u>	<u>Amount</u>
merged call with Erin Ross to discuss transfer of gridworks-ic.com domain (0.5).			
8/27/2020	CAH Receivership Duties Discuss litigation issues with Health share regarding security breach and access preservation and storage of emails and other documents. Check on search software and email storage for Maren Cohn.	0.70	367.50
8/31/2020	MOC Receivership Duties Call with Martha regarding responding to ADP need for information (0.1); retrieve banking information for Aaron Gillingham and send to Martha Cohn for cash flow update (0.2); process miscellaneous email (0.1).	0.40	154.00
	MC Accounting Write checks, look for ADP client ID, perform weekly cash tasks.	1.20	90.00
<b>For professional services rendered</b>		<b>47.80</b>	<b>\$13,329.00</b>

Additional Charges :

		<u>Price</u>	<u>Qty</u>	
8/18/2020	Mileage expense for round trip Portland to Salem.	\$0.54	90	48.15
<b>Total additional charges</b>				<b>\$48.15</b>
<b>Total amount of this bill</b>				<b>\$13,377.15</b>
Accounts receivable transactions				
8/31/2020	Payment Invoice 2400- Thank You. Check No. 1034			(\$15,522.00)
<b>Total payments and adjustments</b>				<b>(\$15,522.00)</b>
Balance due				<u><u>\$13,377.15</u></u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	1.40	525.00	\$735.00
Maren Cohn - Consultant	29.40	385.00	\$11,319.00
Martha Cohn - Jr. Consultant	17.00	75.00	\$1,275.00

1 CERTIFICATE OF SERVICE

2 I hereby certify that on September 15, 2020 I caused to be served a full and exact copy of  
3 the 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, 10<sup>th</sup> 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 8950 SW Midea Ln  
11 Portland, OR 97225  
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: September 15, 2020

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