

BUTLER | SNOW

April 5, 2013

VIA HAND DELIVERY

Hon. James M. Allison, Chairman
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Joint Petition of Tennessee-American Water Company, the City of Whitwell, Tennessee, and the Town of Powells Crossroads, Tennessee, for Approval of a Purchase Agreement and a Water Franchise Agreement and for the Issuance of a Certificate of Convenience and Necessity, TRA Docket No. 12-00157

Dear Chairman Allison:

With this letter, I enclose an electronic version of Tennessee American Water Company's Response to the Motion to Compel filed by Consumer Advocate and protection Division of the Office of the Attorney General, along with an original and four (4) hard copies of the same.

An extra copy of this cover letter is also enclosed to be file-stamped for our records. Should you have any questions concerning this filing, or require additional information, please do not hesitate to let me know.

With best regards, I am

Very truly yours,



Junaid A. Odubeko

Enclosures

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

JOINT PETITION OF)	
TENNESSEE AMERICAN WATER)	
COMPANY, THE CITY OF)	DOCKET NO. 12-00157
WHITWELL, TENNESSEE, AND THE)	
TOWN OF POWELLS CROSSROADS,)	
TENNESSEE, FOR APPROVAL OF A)	
PURCHASE AGREEMENT AND A)	
WATER FRANCHISE AGREEMENT)	
AND FOR THE ISSUANCE OF A)	
CERTIFICATE OF CONVENIENCE)	
AND NECESSITY)	

**TENNESSEE AMERICAN WATER COMPANY’S RESPONSE TO THE MOTION TO
COMPEL FILED BY CONSUMER ADVOCATE AND PROTECTION DIVISION OF
THE OFFICE OF THE ATTORNEY GENERAL**

Tennessee American Water Company (“TAWC”), by and through counsel, hereby submits its response to the Motion to Compel filed by the Consumer Advocate and Protection Division of the Office of the Attorney General (the “Consumer Advocate”) on April 3, 2013.

I. INTRODUCTION

Placing the cart entirely before the horse, the Consumer Advocate has asked the Authority to order TAWC to produce detailed charges reflecting the due-diligence costs related to acquiring the Whitwell Water System, because the Consumer Advocate claims that it must comb through this information now to evaluate whether the Authority should allow TAWC to recover these charges from the ratepayers. The requested information includes itemized timekeeping and billing records from TAWC’s counsel and other potentially privileged information. By insisting on obtaining the requested information, the Consumer Advocate is attempting to use this docket as a vehicle to get a head start on issues pertaining to the next rate

case. This request is premature, and the documents sought by the Consumer Advocate are not relevant to the accounting and rate-base treatment sought by TAWC in this docket. For these reasons, and others more fully developed in this Response, TAWC requests that the Authority deny the Consumer Advocate's Motion to Compel.

II. PROCEDURAL BACKGROUND

On December 27, 2012, the TAWC filed an Expedited Joint Petition with the City of Whitwell and the Town of Powells Crossroads seeking both the approval of the acquisition by TAWC of the water system owned by Whitwell and the approval of a franchise agreement between Powells Crossroads and TAWC.¹ In conjunction with these requests, TAWC sought a Certificate of Convenience and Necessity ("CCN") to serve the areas currently served by Whitwell.² In addressing its proposed regulatory treatment, TAWC noted the costs associated with conducting the necessary "due diligence and prudence evaluation" with respect to the Whitwell System and the benefit to both shareholders and current ratepayers of properly documenting the transactions.³ Further, TAWC proposed to recover for these necessary and reasonable expenses by recording "a regulatory asset to be amortized over the life of the System assets"- as opposed to seeking to immediately recover these costs in this docket.⁴ Moreover, in addition to asking the TRA to approve the purchase agreement, franchise agreement, and CCN in its prayer for relief, TAWC asked the TRA to "approve accounting and rate base treatments that reflect the full purchase price, plus the acquisition and transaction costs in TAWC's net original

¹ Joint Petition pg. 1.

² Id.

³ Joint Petition pg. 7, ¶22(e).

⁴ Joint Petition pg. 7, ¶22(e).

cost rate base or other guidance that shows that future rate base determinations will be consistent with the value of the full purchase price plus acquisition and transactions costs.”⁵

On March 6, 2013, the Consumer Advocate informally provided TAWC with its initial set of data requests. Of the Consumer Advocate’s twenty initial data requests, seven subsequent requests to supplement TAWC’s initial responses, fifteen requests contained in the second round of discovery, and almost innumerable requests for clarification and additional information throughout discovery, the parties have reached an impasse on only one request, D.R. #16.

As originally filed, D.R. #16 asked for a “breakdown,” including source, amount, and specific purpose, of the costs listed by TAWC in response to a data request by the TRA Staff asking TAWC to identify and itemize acquisition and transaction costs. In responding to the TRA Staff request for the same information, TAWC listed “due diligence,” “title work,” and “document preparation” as anticipated expenses and estimated \$55,000 in potential costs.⁶ In the spirit of cooperation, TAWC provided even more information to the Consumer Advocate. This information included the name of the vendors who performed the work, a brief description of the work performed, and the cost amount for the work.⁷

On March 18, the Consumer Advocate upped the ante by asking TAWC to provide “a detail of the charges that TAWC proposes to include in the deferred accounting.”⁸ Although this request for “detail” was somewhat unclear, the Consumer Advocate clarified its request by insisting that this information include information related to the “source of the charge,” the “purpose of the charge,” the “amount of the charge,” and the “date” of the charge.⁹ For TAWC’s reference, the Consumer Advocate attached a spreadsheet as an example of what they sought.

⁵ Joint Petition pg. 9, ¶(4).

⁶ TAWC Response to TRA Staff Request Data Request #2.

⁷ TAWC Response to Consumer Advocate Data Request #16.

⁸ See Consumer Advocate’s Motion to Compel Tennessee American Water Company to Answer Data Requests to Provide Itemized Detail of Due Diligence Costs Requested for Recovery, pg. 4.

⁹ *Id.*

This spreadsheet, attached to this Response as Exhibit A, contained detailed, line-by-line narratives of legal services rendered in an unrelated docket and filed with the TRA in an attempt to recover attorneys' fees for those services. After TAWC indicated that it would not produce the itemized charges of the due-diligence costs, the Consumer Advocate filed the Motion to Compel currently before the Authority.

III. ARGUMENT

A. The Authority should deny the Consumer Advocate's Motion to Compel because the documents it seeks are not relevant to the issues presented in this docket.

The Consumer Advocate insists that the Authority should order TAWC to turn over extensive detail of TAWC's due-diligence costs and attorneys' fees, including detailed timekeeping and billing records. TAWC respectfully submits that the Authority should deny the Consumer Advocate's request as premature. The purpose of this docket is to consider approving TAWC's proposed acquisition of the Whitwell Water System. As explained in more detail above, as part of this request, TAWC has requested certain accounting and rate-base treatment of its acquisition and transactions costs. This docket does not seek a rate change or a determination regarding recovery of these acquisition or transaction costs. The appropriate forum for TAWC to request recovery of its costs is a rate case. In addition, the Consumer Advocate's request is premature because TAWC will not know the total due diligence costs until after closing on the acquisition. Thus, the Consumer Advocate's inquisition into the due-diligence costs and attorneys' fees for this transaction is premature.

Although the Consumer Advocate argues that the Authority should order TAWC to produce the requested information so the Consumer Advocate can adequately review the costs sought by TAWC and recommend whether TAWC should recover for these costs, the Authority

should reject this argument because this docket is not the proper forum to inquire into the necessity, reasonableness, or prudence of the costs sought by TAWC—a rate case is the proper venue to raise those issues. The Consumer Advocate seems to recognize this timeliness roadblock in its Motion to Compel. But it attempts to maneuver around this roadblock with two arguments.

First, the Consumer Advocate argues that TAWC should produce these detailed records now, because it fears that evidence may become spoiled before the next rate case.¹⁰ The Authority should reject this argument because it suffers the same fatal flaw as the Consumer Advocate’s primary argument. Namely, seeking an order of the Authority forcing TAWC to produce this detailed information in this docket is premature. The sufficiency of supporting evidence presented by TAWC to justify potential future rate changes is a matter more appropriately considered in future rate cases. Practically, the nature of a rate-case proceeding incentivizes TAWC to preserve as much of this evidence as possible in order to potentially recover for these costs in the future. As argued throughout this Response, in this docket, TAWC merely seeks an accounting and rate-treatment remedy. Thus, ordering TAWC to produce the requested information falls outside the scope of relevance for this docket.

Next, the Consumer Advocate argues for the requested information so it can “provide complete arguments” for its pre-hearing brief.¹¹ Despite the Consumer Advocate’s argument to the contrary, it does not need this information to complete its response. In the Consumer Advocate’s proposed issues list, it indicated that it challenges whether due-diligence costs are proper to include as a regulatory expense or if they primarily benefit investors and not the

¹⁰ See Consumer Advocate’s Motion to Compel Tennessee American Water Company to Answer Data Requests to Provide Itemized Detail of Due Diligence Costs Requested for Recovery, pg. 4.

¹¹ See Consumer Advocate’s Motion to Compel Tennessee American Water Company to Answer Data Requests to Provide Itemized Detail of Due Diligence Costs Requested for Recovery, pg. 2.

ratepayers. On its fact, this is a purely legal issue as to whether the Authority should ever treat due-diligence costs as regulatory costs. Therefore, the details of the costs in dispute in this matter are completely irrelevant to the legal issue. And the Consumer Advocate does not need any itemized charges to complete its purely legal argument against including due-diligence costs as regulatory costs. To imply, as the Consumer Advocate did in its Motion to Compel, that it needs the requested information to complete its legal argument is disingenuous at best. Moreover, even if the Consumer Advocate possessed these documents, they would serve little or no purpose in approving the acquisition, which is the issue before the Authority in this docket.

In addition, the Authority has not typically reviewed detailed billing records and time sheets in determining appropriate fees. Instead, it has relied upon summary records and testimony of witnesses, including affidavits and pre-filed testimony.¹²

For the reasons stated above, the Authority should reject the Consumer Advocate's request to order TAWC to produce the requested documents as premature.

B. In the alternative, TAWC reserves the right to argue whether the attorney-client privilege protects the information requested by the Consumer Advocate.

As discussed throughout this Response, the Consumer Advocate is seeking detailed records from TAWC's counsel in the form of itemized timekeeping and billing records. The requested information includes detailed narratives reflecting the subject matter and content of confidential communications between TAWC and its counsel as well as other potentially privileged information. In the view of some courts, the attorney-client privilege cloaks much of

¹² See, e.g., Docket Nos. 07-00224, 08-00039, and 09-00183.

the detail contained in these attorney records.¹³ Moreover, many of the authorities cited by the Consumer Advocate do not support its argument that TAWC must provide “itemized” charges for its due diligence and legal costs.¹⁴ Since TAWC is not seeking to recover attorneys’ fees for its costs in this docket, it respectfully requests to reserve its right to argue, in a more-appropriate proceeding such as a rate case, whether the privilege applies to the requested information.

IV. CONCLUSION

The Consumer Advocate’s request to order TAWC to produce the information in question is simply not ripe for hearing in this acquisition docket. Such inquiry is proper during a rate proceeding, when the sufficiency of the evidence supporting the rate request is in dispute. Here, TAWC merely seeks an accounting and rate-base treatment to reserve the issue for a future rate case. Thus, the documents sought by the Consumer Advocate have no relevance to the issues surrounding the approval of the acquisition. For these reasons, the Authority should deny the Consumer Advocate’s untimely request. Moreover, in the alternative, TAWC submits that much of the information sought by the Consumer Advocate is protected by the attorney-client privilege. Thus, TAWC respectfully reserves the right to argue the application of the privilege at a more appropriate forum—such as a rate case.

¹³ See *Knoxville News-Sentinel v. Huskey*, 982 S.W.2d 359 (Tenn. Crim. App. 1998) (affirming a trial court ruling not to unseal detailed attorney fee and expense claims).

¹⁴ For example, the Consumer Advocate cites the case of *Binta v. Gordon*, __ F.3d __, 2013 WL 113644 (March 20, 2013), to support the argument that a court must review detailed fee information to determine their appropriateness. But, the court in this case made no statement regarding the level of detail required for its determination. It merely cited an example of a one-time entry that it reviewed in a consent decree that allowed the Plaintiffs to recover attorneys’ fees. The parties were involved in several other matters at the same time, so the Court was required to determine which portions of the legal fees were applicable to which case and parties. Here, all the fees relate to the acquisition of the Whitwell Water System.

The Consumer Advocate also cites the case of *Hensley v. Eckerhart*, 461 U.S. 424 (1983), to support its assertion that records of fees must be detailed. The *Hensley* Court, however, does not insist on such a requirement. In fact, the Court simply states that “the party seeking fees should submit evidence supporting the hours worked and rates claimed.” *Id.* At 433.

Respectfully submitted,

BUTLER, SNOW, O'MARA, STEVENS &
CANNADA, PLLC

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Counsel for Tennessee American Water Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via hand delivery to the following this 5th day of April, 2013.

Cynthia Kinzer
Charlena Aumiller
Consumer Advocate and Protection Division
Office of the Attorney General
P.O. Box 20207
Nashville, TN 37202

Junaid Odubeko

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF LAUREL HILLS
CONDOMINIUMS PROPERTY OWNERS
ASSOCIATION FOR A CERTIFICATE
OF PUBLIC CONVENIENCE AND
NECESSITY**

DOCKET NO. 12-00030

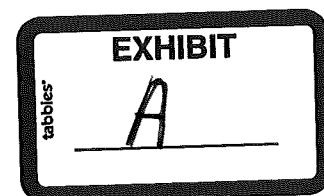
BRANSTETTER, STRANCH, & JENNINGS RESPONSE TO STAFF DATA REQUESTS

On January 31, 2013, Branstetter, Stranch, and Jennings, PLLC ("BSJ") received a staff data request in the above-identified docket seeking information related to the attorney's fees incurred by the Petitioner in prosecution of its Petition. This is BSJ's response to that request.

Attached as Exhibit A is the fees billed and unbilled through January 31, 2013 in the matter along with narratives associated with the work performed by each time keeper. Where necessary, narratives have been redacted to preserve attorney-client and work-product privileges. Also attached as Exhibit B is a similar spreadsheet for fees billed and unbilled to Laurel Hills for ongoing legal matters including two pending cases in Cumberland County.

The time keepers that have worked on these matters include attorneys Benjamin Gastel and Don Scholes and paralegal Ryan Cheng.

Staff also requested that BSJ provide an estimate on anticipated fees to conclude the proceeding. BSJ anticipates expending at least \$12,000 more in time, representing approximately 50 hours for Mr. Gastel and 15 hours for Mr. Scholes in finalizing this proceeding. This is a reasonable estimation given that Mr. Gastel has already expended 10 hours of time so far in February (and not captured on the attached spreadsheets which only go through January 31) and Mr. Scholes plans on attending and participating in the hearing scheduled for



February 13. Significant amounts of time will also likely be devoted to drafting and editing the post-hearing briefs currently anticipated under the current Pre-Hearing Order.

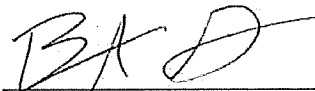
For the TRA's convenience, the below chart summarizes BSJ's fees and expenses:

	TRA Proceeding		Other Matters	
Billed Fees	\$	35,305.00	\$	52,700.00
Unbilled Fees	\$	3,135.00	\$	435.00
Expenses	\$	605.39	\$	1,216.18
Anticipated	\$	12,000.00	--	
Total	\$	51,045.39	\$	53,135.00

This information is gleaned from the amounts reflected in Exhibits A and B.

DATED: February 8, 2013

RESPECTFULLY SUBMITTED,



DONALD L. SCHOLES
BENJAMIN A. GASTEL
Branstetter, Stranch & Jennings, PLLC
227 Second Avenue North
Fourth Floor
Nashville, TN 37201-1631

CERTIFICATE OF SERVICE

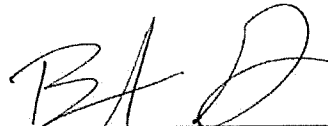
The undersigned hereby certifies that a true and exact copy of the foregoing was served upon
the following via United States Mail:

Shiva Bozarth, General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

John J. Baroni, Esq
Consumer Advocate Division Office of
the Attorney General
P.O. Box 20207
425 5th Avenue North, 2nd Floor
Nashville, TN 37243-0500

Melanie Davis
Kizer & Black Attorneys, PLLC
329 Cates St.
Maryville, TN 37801

This the 8th day of February, 2013



Benjamin A. Gastel

EX. A BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter:	12400	TRA Regulatory Proceeding					
Matter	Date	Time: Bill	Hours	Rate	Amount	Narrative	
12400	07/16/2012	BG	47953	1.40	\$150.00	\$ 210.00	Confer with TRA regarding CCN process and show cause hearing; confer with counsel regarding same; review TN rules regarding appellate procedure; draft memo to client regarding same
12400	07/19/2012	DLS	47953	1.00	\$300.00	\$ 300.00	Prepare Notice of Reinstatement and finalize temporary tariff; Call with Greg Logue on Chancellor's statements in Community Club case; Conference with Ben Gastel about next steps to take on TRA Petition proceeding
12400	07/19/2012	RCHG	47953	0.30	\$100.00	\$ 30.00	Prepare Notice and cover letter for filing at TRA; Email to Sharla Dillon
12400	07/26/2012	BG	47953	3.50	\$150.00	\$ 525.00	Draft and edit amended petition; draft and edit amended tariff; confer with TRA counsel regarding petition; confer with counsel regarding same; research regarding standard terms and conditions regarding water service tariffs
12400	07/27/2012	BG	47953	0.70	\$150.00	\$ 105.00	Confer with client regarding case status; draft and edit amended complaint
12400	07/30/2012	BG	47953	1.90	\$150.00	\$ 285.00	Draft and edit amended petition; review documents from client regarding same; confer with Roger York regarding outstanding bill to Crab Orchard Utility District; confer with counsel regarding case status
12400	07/31/2012	DLS	47953	2.00	\$300.00	\$ 600.00	Revise Amended Petition for CCN and tariff for filing
12400	08/02/2012	BG	48139	1.30	\$150.00	\$ 195.00	Confer with client regarding changes to amended petition; correspondence with TRA regarding case status and filing of amended petition; draft and edit proposed agreed order for case pending in Cumberland County Chancery Court; confer with counsel regarding same
12400	08/03/2012	DLS	48139	1.00	\$300.00	\$ 300.00	Finalize amended petition for certificate and proposed tariff
12400	08/06/2012	BG	48139	1.20	\$150.00	\$ 180.00	Draft and edit correspondence to Roger York; review correspondence from Laurel Hills; confer with counsel regarding cas status
12400	08/07/2012	BG	48139	1.70	\$150.00	\$ 255.00	Review correspondence from TRA; confer with counsel regarding same; finalize and send letter to Roger York; review materials sent from Michael McClung; review TRA process for responding to data requests; confer with counsel for TRA regarding status of petition; review joint motion and order to stay show cause hearing
12400	08/13/2012	BG	48306	0.20	\$150.00	\$ 30.00	Review TRA hearing docket; confer with counsel regarding same
12400	08/15/2012	BG	48139	0.30	\$150.00	\$ 45.00	Confer with TRA regarding status conference
12400	08/16/2012	DLS	48139	0.20	\$300.00	\$ 60.00	E-mail with Ben Gastel on status of discovery and staff request
12400	08/17/2012	BG	48139	0.80	\$150.00	\$ 120.00	Review letter from Crab Orchard; confer with counsel regarding same; confer with TRA regarding data requests; status conference; and Crab Orchard letter; draft and edit letter back to Crab Orchard utility district
12400	08/20/2012	BG	48139	0.30	\$150.00	\$ 45.00	Confer with TRA counsel regarding payments to Crab Orchard Utility District
12400	08/21/2012	BG	48139	1.50	\$150.00	\$ 225.00	Draft and edit letter to Melanie Davis regarding pending docket setting in Cumberland County; confer with client regarding case status; review letter from Crab Orchard counsel; research TN law regarding termination of service to a water provider; confer with TRA regarding intervenors; review TRA proceedings regarding objections to intervenors
12400	08/22/2012	BG	48306	1.20	\$150.00	\$ 180.00	Confer with client regarding TRA hearing and status of hearing; review correspondence from Melanie Davis; confer with counsel regarding same; review customers
12400	08/23/2012	BG	48139	3.40	\$150.00	\$ 510.00	Prepare for, travel to and from, and attend TRA scheduling hearing; draft and edit proposed stipulation with customer intervenors; draft and edit correspondence; review previous TRA data requests; confer with counsel regarding same
12400	08/23/2012	DLS	48139	2.20	\$300.00	\$ 660.00	Attend scheduling conference at TRA; E-mails and conference with Ben Gastel on preparing pre-filed testimony for Mike McClung and what this involves
12400	08/27/2012	DLS	48139	2.30	\$300.00	\$ 690.00	Revise Stipulation; Review Melanie Davis' response to Stipulation; E-mails and calls with counsel for all of the parties on agreeing upon a schedule for the scheduling order
12400	08/27/2012	RCHG	48139	0.40	\$100.00	\$ 40.00	Prepare Certificate of Service on Stipulation and cover letter to Sharla Dillon; Email to Sharla Dillon
12400	08/28/2012	DLS	48139	4.30	\$300.00	\$ 1,290.00	Prepare e-mail to hearing officer on dates for scheduling order; Receive and review information to respond to TRA Staff Information Request; Call with Mike McClung and Rob Schwemer about information request and responding to it; Call to Paul Greene with TRA about information request
12400	08/29/2012	DLS	48139	5.60	\$300.00	\$ 1,680.00	Prepare Response to TRA Staff Information Request and prepare pre-filed testimony for Mike McClung
12400	08/30/2012	DLS	48139	5.30	\$300.00	\$ 1,590.00	Prepare Response to TRA Staff Information Request and prepare pre-filed testimony for Mike McClung; E-mails with Mike McClung on Response
12400	08/30/2012	DLS	48139	3.30	\$300.00	\$ 990.00	Prepare Response to TRA Staff Information Request and prepare pre-filed testimony for Mike McClung
12400	09/02/2012	DLS	48306	3.00	\$300.00	\$ 900.00	Prepare response to TRA request; Revise McClung Direct Testimony; Review financial information from Lansford and Stephens; E-mail McClung Direct Testimony to him to review
12400	09/04/2012	DLS	48306	3.50	\$300.00	\$ 1,050.00	Prepare response to TRA request; Revise McClung Direct Testimony; Review financial information from Lansford and Stephens; E-mail with Mike McClung on his Direct Testimony
12400	09/04/2012	RCHG	48306	1.10	\$100.00	\$ 110.00	Prepare draft of Response to Staff Data Request

TRA Staff Data Request

EX. A BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter:	12400	TRA	Regulatory Proceeding				
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative	
12400	09/05/2012	RCHG	48306	0.50	\$100.00	\$ 50.00	Revise Response to Staff Data Request
12400	09/05/2012	DLS	48306	4.00	\$300.00	\$ 1,200.00	E-mails with Mike McClung and Lansford and Stephens for responses to TRA Staff Request; Review information and documents from Mike McClung and Lansford and Stephens for Response and prepare Reponse and McClung prefilled testimony
12400	09/06/2012	DLS	48306	1.20	\$300.00	\$ 360.00	Prepare Mike McClung prefilled testimony and e-mail to him for review
12400	09/06/2012	RCHG	48306	0.40	\$100.00	\$ 40.00	Prepare cover letter to Sharla Dillon (TRA) on Pre-filed Testimony of Michael McClung; Email to Sharla Dillon (TRA)
12400	09/07/2012	RCHG	48306	0.40	\$100.00	\$ 40.00	Prepare cover letter to Sharla Dillon (TRA) on Response to Staff Data Request; Email to Sharla Dillon (TRA)
12400	09/07/2012	DLS	48306	3.20	\$300.00	\$ 960.00	Prepare Response to TRA Staff Request; Review spreadsheets from Lansford and Stephens for Response; Prepare letter to Roger York in response to his letter regarding the termination of service to Laurel Hills
12400	09/10/2012	DLS	48306	0.40	\$300.00	\$ 120.00	E-mail from Mike McClung and conference with Ben Gastel on Microbac invoice and ledger
12400	09/17/2012	DLS	48306	0.40	\$300.00	\$ 120.00	Review CAPD discovery request and e-mail to Ben Gastel about responding
12400	09/18/2012	DLS	48306	0.80	\$300.00	\$ 240.00	Review draft responses to CAPD discovery requests and conference with Ben Gastel on these responses
12400	09/18/2012	RCHG	48306	0.80	\$100.00	\$ 80.00	Review, print and organize pleadings for BG
12400	09/18/2012	BG	48306	1.90	\$150.00	\$ 285.00	Review AG's data requests; confer with counsel regarding data requests; draft and edit data requests; confer with clients regarding data requests; review previously filed material filed in response to TRA data requests and initial testimony of Mike McClung
12400	09/19/2012	BG	48306	2.80	\$150.00	\$ 420.00	Confer with Mike McClung regarding testimony and responses to CAG responses; draft and edit responses to CAG requests; confer with counsel regarding same; confer with TRA counsel regarding status of case in Cumberland County and status of Petition; confer with counsel regarding same
12400	09/19/2012	DLS	48306	0.50	\$300.00	\$ 150.00	Conference with Ben Gastel on responses to CAPD discovery requests and Intervenor's requests
12400	09/20/2012	DLS	48306	0.20	\$300.00	\$ 60.00	Conference with Ben Gastel on the objections to the CAPD and Intervenor's discovery requests
12400	09/20/2012	BG	48306	1.70	\$150.00	\$ 255.00	Draft and edit responses to CAG data requests; review requests propounded by Laurel Hills customer
12400	09/21/2012	BG	48306	0.70	\$150.00	\$ 105.00	Draft and edit changes to CAG responses
12400	09/24/2012	DLS	48306	0.20	\$300.00	\$ 60.00	Conference with Ben Gastel on response to CAPD discovery request
12400	09/24/2012	BG	48306	5.20	\$150.00	\$ 780.00	Draft and edit discovery responses; confer with counsel regarding same; confer with client regarding same; prepare filing at TRA; review scheduling order and timeline for hearing
12400	09/25/2012	BG	48306	6.30	\$150.00	\$ 945.00	Draft and edit discovery requests; confer with counsel from TRA regarding case status; review documents produced by client; confer with client regarding discovery requests
12400	09/25/2012	DLS	48306	1.00	\$300.00	\$ 300.00	Review responses to CAPD discovery requests and conference with Ben Gastel on the responses
12400	09/25/2012	RCHG	48306	0.50	\$100.00	\$ 50.00	Prepare Response for filing with the TRA; Prepare cover letter to Sharla Dillon (TRA); Email to Sharla Dillon (TRA) on Response
12400	09/26/2012	RCHG	48306	0.60	\$100.00	\$ 60.00	Proof and revise Response To Intervenor Discovery Requests; Prepare cover letter to Sharla Dillon (TRA); Email to TRA for filing Response
12400	09/26/2012	BG	48306	5.20	\$150.00	\$ 780.00	Draft and edit discovery requests; serve discovery requests; review documents produced by Mike McClung; review promissory note; confer with counsel regarding scheduling
12400	09/26/2012	DLS	48306	0.50	\$300.00	\$ 150.00	Review responses to Supplemental TRA Staff Request and Intervenor's discovery request prepared by Ben Gastel
12400	09/27/2012	DLS	48306	0.30	\$300.00	\$ 90.00	Conference with Ben Gastel on response to discovery request and request to depose Everett Bohn
12400	09/27/2012	BG	48306	2.20	\$150.00	\$ 330.00	Draft and edit final discovery responses; confer with client regarding 1972 deed related to covenants of water system; confer with CAD and customer intervenors regarding a modified schedule; confer with staff regarding same; finalize and serve discovery responses
12400	09/28/2012	BG	48306	1.70	\$150.00	\$ 255.00	Conference call with TRA regarding modifying the schedule; confer with counsel regarding same; draft and edit letter to Roger York; confer with counsel regarding same; draft and edit objection to deposition
12400	10/01/2012	RCHG	48426	0.50	\$100.00	\$ 50.00	Prepare Response to Customer Intervenor's Request for Subpoena for filing and cover letter to Sharla Dillon (TRA); Email to Sharla Dillon
12400	10/01/2012	BG	48426	0.50	\$150.00	\$ 75.00	Finalize and file final version of objections to Crab Orchard subpoena
12400	10/01/2012	DLS	48426	0.80	\$300.00	\$ 240.00	Review Intervenor's Response to TRA Staff Request and conference with Ben Gastel about response; Review recent TRA filings by the parties
12400	10/02/2012	BG	48426	0.60	\$150.00	\$ 90.00	Review direct testimony filed by customer intervenors; review filings by attorney general
12400	10/03/2012	BG	48426	0.90	\$150.00	\$ 135.00	Review testimony filed by John Moore and the Attorney General; confer with counsel and client regarding same
12400	10/04/2012	BG	48426	0.40	\$150.00	\$ 60.00	Confer with counsel regarding rebuttal testimony; review testimony filed by customer intervenors

TRA Staff Data Request

EX. A BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter:	12400	TRA Regulatory Proceeding					
Matter	Date	Time: Bill	Hours	Rate	Amount	Narrative	
12400	10/04/2012	DLS	48426	0.50	\$300.00	\$ 150.00	Review filings with TRA and conference with Ben Gastel on the date for filing of rebuttal testimony
12400	10/05/2012	DLS	48426	0.70	\$300.00	\$ 210.00	Review scheduling order and conference with Ben Gastel on order
12400	10/05/2012	BG	48426	0.40	\$150.00	\$ 60.00	Draft and edit rebuttal testimony; review revised scheduling order; confer with Mike McClung regarding same
12400	10/11/2012	BG	48426	1.20	\$150.00	\$ 180.00	Draft and edit discovery responses; review documents regarding same; review TRA hearing procedures related to discovery
12400	10/11/2012	DLS	48426	0.50	\$300.00	\$ 150.00	Review second discovery request by Intervenor and conference with Ben Gastel on TRA rule which limits the number of discovery requests
12400	10/12/2012	BG	48426	0.70	\$150.00	\$ 105.00	Confer with client regarding TRA proceedings; draft and edit discovery requests; draft and edit discovery responses; confer with client regarding same
12400	10/15/2012	BG	48426	1.80	\$150.00	\$ 270.00	Draft and edit discovery requests; confer with counsel regarding requests; confer with client regarding case status; confer with client regarding discovery requests; confer with opposing counsel regarding discovery requests; review discovery requests served by Customer Intervenor; review scheduling order regarding same
12400	10/15/2012	DLS	48426	0.40	\$300.00	\$ 120.00	Review and make comments on discovery request to intervenors prepared by Ben Gastel
12400	10/16/2012	DLS	48426	0.40	\$300.00	\$ 120.00	Conference with Ben Gastel and research on REDACTED.
12400	10/16/2012	BG	48426	0.40	\$150.00	\$ 60.00	Confer with counsel regarding REDACTED; confer with Shiva Bozart of TRA regarding covenant and deed restrictions; confer with client regarding REDACTED
12400	10/17/2012	BG	48426	0.50	\$150.00	\$ 75.00	Confer with opposing counsel regarding case status; review documents sent by client regarding REDACTED; review REDACTED
12400	10/19/2012	BG	48426	1.80	\$150.00	\$ 270.00	Draft and edit objections to discovery; prepare for hearing on Monday; confer with client regarding REDACTED
12400	10/19/2012	RCHG	48426	0.50	\$100.00	\$ 50.00	Prepare cover letter to Sharla Dillon (TRA); Email to Sharla Dillon on Objections; File Objections with TRA
12400	10/19/2012	DLS	48426	0.60	\$300.00	\$ 180.00	Internal conference with Ben Gastel on restrictive covenants of Renegade Mountain which address the water system and on objections to discovery requests of Intervenor
12400	10/22/2012	DLS	48426	0.40	\$300.00	\$ 120.00	Conference with Ben Gastel on Motion to Compel by Intervenor
12400	10/23/2012	BG	48426	0.60	\$150.00	\$ 90.00	Correspondence with client regarding matter; review bank statements in TRA case for basis of denying payment to Crab Orchard; confer with counsel regarding same; review rules of TRA REDACTED.
12400	10/24/2012	BG	48426	2.50	\$150.00	\$ 375.00	Review documents produced to TRA regarding money outlays of Laurel Hills; teleconference with client regarding REDACTED; review definition of public utility under TN law; review REDACTED.
12400	10/24/2012	DLS	48426	0.30	\$300.00	\$ 90.00	Internal conference with Ben Gastel before his conference call with client
12400	10/25/2012	DLS	48426	0.30	\$300.00	\$ 90.00	Conference with Ben Gastel on issues surrounding REDACTED
12400	10/25/2012	BG	48426	1.20	\$150.00	\$ 180.00	Draft and edit order on interlocutory appeal; review notes regarding same; review motion regarding same; review Tennessee Rules of Appellate Procedure; confer with opposing counsel regarding same; confer with Attorney General regarding water tower accounting
12400	10/30/2012	BG	48426	0.30	\$150.00	\$ 45.00	Review and finalize and file final version of agreed order
12400	10/30/2012	RCHG	48426	0.40	\$100.00	\$ 40.00	Prepare cover letter to Clerk; Review Agreed Order
12400	10/31/2012	BG	48426	0.40	\$150.00	\$ 60.00	Review motion to compel filed by Intervenor; review TN law on scope of discovery
12400	11/02/2012	DLS	48559	0.40	\$300.00	\$ 120.00	Review Motion to Compel and conference with Ben Gastel on how to respond
12400	11/02/2012	RCHG	48559	0.90	\$100.00	\$ 90.00	Revise Response to 2nd & 3rd DISC Requests of Customer Intervenor; Prepare cover letter to TRA; Email to Sharla Dillon (TRA)
12400	11/02/2012	BG	48559	0.80	\$150.00	\$ 120.00	Draft and edit final version of motion to compel; confer with counsel regarding same; draft and edit letter regarding filing; prepare and file motion to compel and discovery; serve motion to compel and discovery
12400	11/05/2012	BG	48559	0.80	\$150.00	\$ 120.00	Review correspondence from hearing officer; confer with client regarding TRA request; confer with opposing counsel regarding Wednesday's hearing and outstanding discovery issues
12400	11/06/2012	BG	48559	1.50	\$150.00	\$ 225.00	Prepare for hearing; confer with counsel regarding same; confer with client regarding hearing
12400	11/07/2012	BG	48559	4.20	\$150.00	\$ 630.00	Prepare for hearing; research regarding meaning of possession custody or control as that term is used in TRCP 34.01; confer with counsel regarding hearing; review previous filings of discovery; confer with opposing counsel regarding discovery and supplemental discovery responses
12400	11/08/2012	BG	48559	1.20	\$150.00	\$ 180.00	Draft and edit supplemental discovery responses; confer with client regarding discovery responses and insurance policies; review correspondence from client; review schedule and proposed scheduling changes; confer with counsel regarding same

EX. A BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO			
Matter:	12400	TRA Regulatory	Proceeding		
Matter:	Date	Time: Bill	Hours	Rate	Amount
12400	11/08/2012	RCHG	48559	0.50	\$100.00
					\$ 50.00
					Internal conference with BG on Supplemental Response; Prepare cover letter to TRA; Email to Sharla Dillon (TRA) on Supplemental Response
12400	11/08/2012	DLS	48559	0.20	\$300.00
					\$ 60.00
					Conference with Ben Gastel on status of TRA proceeding
12400	11/09/2012	BG	48559	0.50	\$150.00
					\$ 75.00
					Review correspondence and confer with counsel and attorney general regarding amended schedule; confer with counsel and client regarding amended schedule and discovery
12400	11/12/2012	BG	48559	0.50	\$150.00
					\$ 75.00
					Review revised discovery requests served by Customer Intervenor
12400	11/14/2012	BG	48559	2.20	\$150.00
					\$ 330.00
					Draft and edit discovery responses; confer with counsel regarding same; confer with client regarding hearing and petition status; review initial orders on motion to compel; confer with counsel regarding same
12400	11/15/2012	BG	48559	1.50	\$150.00
					\$ 225.00
					Conference call with clients; review email correspondence from TRA; confer with TRA counsel regarding same
12400	11/16/2012	DLS	48559	1.20	\$300.00
					\$ 360.00
					Internal conference with Ben Gastel on Order to Compel issued by hearing officer, on client's decision to pay other expenses before electric bill and water bill and responses to Intervenor's discovery request
12400	11/16/2012	BG	48559	4.40	\$150.00
					\$ 660.00
					Draft and edit discovery responses; confer with client regarding discovery responses; review correspondence and previously produced documents regarding cash flow issues; confer with TRA regarding case status; review TN law regarding definition of public utility and changes to that definition over time; confer with counsel regarding same
12400	11/18/2012	BG	48559	0.40	\$150.00
					\$ 60.00
					Review correspondence from client and accountant; review license agreement and Customer's discovery requests; review case file and status
12400	11/19/2012	BG	48559	5.20	\$150.00
					\$ 780.00
					Draft and edit discovery responses; review previous document production; prepare document production for production; confer with D. McQueen regarding services rendered to Laurel Hills; confer with client regarding discovery responses; confer with counsel regarding same and review counsel's comments on discovery responses
12400	11/19/2012	BG	48559	1.50	\$150.00
					\$ 225.00
					Draft and edit discovery responses in Cumberland County case; confer with counsel regarding same; review previously filed direct testimony of Mike McClung in TRA case; confer with client regarding discovery responses
12400	11/19/2012	RCHG	48559	0.70	\$100.00
					\$ 70.00
					Prepare Responses for filing with TRA; Prepare cover letter to TRA; Email to Sharla Dillon on 2nd DISC Requests
12400	11/20/2012	DLS	48559	0.70	\$300.00
					\$ 210.00
					Internal conference with Ben Gastel on responding to TRA discovery request and review Answer in case filed by the TRA in Cumberland County
12400	11/20/2012	BG	48559	5.70	\$150.00
					\$ 855.00
					Draft and edit discovery responses in Cumberland County case; confer with counsel and client regarding same; review documents responsive to document requests and prepare document production; draft and edit answer to petition; review TRCP rules regarding same; confer with counsel regarding same
12400	11/27/2012	BG	48559	0.60	\$150.00
					\$ 90.00
					Review correspondence from Shiva Bozart regarding Renegade Mountain Covenants; confer with counsel regarding case status
12400	11/29/2012	BG	48559	2.80	\$150.00
					\$ 420.00
					Review documents regarding evidence filed supporting rate request from Laurel Hills; prepare for E. Bolin deposition; review documents in preparation for same; confer with counsel regarding same
12400	11/30/2012	BG	48559	8.20	\$150.00
					\$ 1,230.00
					Travel to and from and attend deposition of Everett Bolin; confer with counsel regarding same
12400	12/03/2012	BG	48644	0.80	\$150.00
					\$ 120.00
					Confer with counsel regarding case status and deposition; confer with TRA counsel regarding deposition; confer with client regarding same
12400	12/03/2012	DLS	48644	0.30	\$300.00
					\$ 90.00
					Internal conference with Ben Gastel on deposition of Everett Bolin
12400	12/05/2012	BG	48644	0.30	\$150.00
					\$ 45.00
					Confer with Rogery York regarding dispute with Crab Orchard; confer with TRA counsel regarding deposition
12400	12/10/2012	BG	48644	1.90	\$150.00
					\$ 285.00
					Review deposition transcript of Everett Bolin; confer with TRA, CAD, and Customer Intervenor counsel regarding changes to transcript; confer with counsel regarding case status; review and edit documents related to Laurel Hills' acquisition of the system; confer with client regarding deposition on Wednesday
12400	12/11/2012	BG	48644	0.30	\$150.00
					\$ 45.00
					Review documents in preparation for tomorrow's deposition; draft and edit memo to client regarding same
12400	12/12/2012	BG	48644	7.40	\$150.00
					\$ 1,110.00
					Prepare for and attend deposition of Mike McClung; confer with counsel regarding same; review Tennessee law on inadvertent production; confer with counsel regarding same
12400	12/13/2012	BG	48644	1.20	\$150.00
					\$ 180.00
					Review testimony filed by CAPD; confer with counsel regarding same; confer with client regarding 60 notice
12400	12/14/2012	BG	48644	0.70	\$150.00
					\$ 105.00
					Confer with counsel regarding CAPD direct testimony; confer with client regarding same; review filed deposition transcript of E. Bolin
12400	12/14/2012	DLS	48644	0.30	\$300.00
					\$ 90.00
					Internal conference with Ben Gastel on pre-filed testimony of Hal Novak
12400	12/18/2012	BG	48644	0.20	\$150.00
					\$ 30.00
					Confer with counsel regarding case status; review testimony of Hal Novak
12400	12/19/2012	BG	48644	1.30	\$150.00
					\$ 195.00
					Confer with counsel regarding status of case at TRA; teleconference with client regarding options and case status and testimony of Hal Novak
12400	12/19/2012	DLS	48644	1.00	\$300.00
					\$ 300.00
					Conference call with client regarding REDACTED

TRA Staff Data Request

EX. A BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter:	12400	TRA Regulatory Proceeding					
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative	
12400	01/07/2013	BG	486.44	0.30	\$150.00	\$ 45.00	Review correspondence from TRA staff, confer with counsel regarding case status and drafting of testimony
12400	01/08/2013	BG	486.44	1.20	\$150.00	\$ 180.00	Review previously filed testimony and confer with counsel regarding case status and timing of prehearing conference
		Fees Billed	182.80			\$ 35,305.00	
12400	01/09/2013	BG		8.50	150.00	1275.00	Draft and edit rebuttal testimony, confer with counsel regarding same
12400	01/11/2013	BG		4.20	150.00	630.00	Draft and edit rebuttal testimony, confer with counsel regarding same
12400	01/13/2013	BG		0.90	150.00	135.00	Review rebuttal testimony, confer with counsel regarding same
12400	01/14/2013	BG		3.10	150.00	465.00	Draft and edit rebuttal testimony, finalize rebuttal testimony, confer with counsel regarding same
12400	01/27/2013	BG		0.30	150.00	45.00	Review order from Hearing Officer, confer with counsel regarding same, confer with client regarding same and hearing schedule
12400	01/28/2013	BG		0.50	150.00	75.00	Confer with counsel regarding hearing, prepare for hearing
12400	01/29/2013	BG		2.20	150.00	330.00	Prepare for, travel to and from and attend pre-hearing hearing, draft and edit notice to customers, confer with counsel regarding same
12400	01/30/2013	BG		1.20	150.00	180.00	Review notes from yesterday's hearing, confer with client regarding giving notice, review standards for granting motions in limine, confer with counsel regarding case status
		Fees Unbilled	386.50			\$ 3,135.00	
		Total Fees	569.30			\$ 38,440.00	
12400	08/31/2012	0006	48139	\$ 20.00	Tennessee Secretary of State; Invoice # 08312012; Printing Costs		
12400	12/05/2012	0008	48644	\$ 156.51	Ben Gastel; Invoice # 12-400; Mileage for: Roundtrip, Nashville/Cumberland County		
12400	12/05/2012	0041	48644	\$ 21.88	Ben Gastel; Invoice # 12-400, Meals, Cumberland County		
12400	12/27/2012	0009	48644	\$ 180.00	Virgilene Tabor-Lotze; Invoice # 12272012; Court Reporting Fee, deposition of Mr. Everett Bolin		
		Expenses Billed				\$ 378.39	
12400	01/22/2013	0009		\$ 114.50	Christina A. Meza; Invoice # 12CM5178; Court Reporting Fee for deposition of Michael McClung on 12-12-2012		
12400	02/01/2013	0009		\$ 112.50	Nashville Court Reporters; Invoice # 13PJ8009; Court Reporting Fee for Transcript of proceedings of 1-29-2013		
		Expenses Unbilled				\$ 227.00	

Ex. B BSJ Response to Staff Data Request

Client: 004504		LAUREL HILLS CONDO. ASSOCIATIO				
Matter: 11215	General Matters					
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215 03/15/2011	DLS	45910	0.70	\$ -	\$ -	Meet with Mike McClung on representing water system serving Renegade Mountain development in Crab Orchard
11215 03/23/2011	DLS	45910	1.00	\$272.73	\$ 272.73	Call with Rob Schwere on Renegade Mountain water system
11215 03/29/2011	DLS	45910	1.00	\$272.72	\$ 272.72	Teleconference with Rob Schwere
11215 04/12/2011	RCHG	45910	0.30	\$ 90.90	\$ 27.27	Prepare draft of Engagement Letter to Robert Schwere
11215 04/14/2011	DLS	46031	0.30	\$250.00	\$ 75.00	Find Prices Switch transfer documents and e-mail to Rob Schwere
11215 04/29/2011	RCHG	45910	0.30	\$ 90.93	\$ 27.28	Revise Retainer Agreement
11215 05/06/2011	RCHG	46158	0.20	\$ -	\$ -	Email to Mike McClung revised Engagement Letter
11215 05/30/2011	RCHG	46158	0.00	\$ -	\$ -	nddfr
11215 06/16/2011	DLS	46158	0.40	\$250.00	\$ 100.00	Review fax and call with Mike McClung regarding steps being taken to correct problems identified by TDEC
11215 06/17/2011	DLS	46158	1.50	\$250.00	\$ 375.00	Conference call with Rob Schwere, Mike McClung and Bill Reeves on pending enforcement action by TDEC in Davidson County Chancery Court; Call to TDEC General Counsel; Prepare e-mail to Rob Schwere on new statute passed by Tennessee legislature which may bring Laurel Hills under TFA regulation
11215 06/20/2011	DLS	46158	0.40	\$250.00	\$ 100.00	Call with TDEC General Counsel on pending case in Davidson County Chancery Court
11215 06/21/2011	DLS	46158	0.20	\$250.00	\$ 50.00	Call to Rob Schwere about my conversation with TDEC General Counsel
11215 06/23/2011	DLS	46158	0.50	\$250.00	\$ 125.00	Call with Wilson Buntin to advise him of new ownership of Renegade Mountain water system; Prepare e-mail to Rob Schwere and Bill Reeves on my conversation with Wilson Buntin
11215 06/24/2011	DLS	46158	0.30	\$250.00	\$ 75.00	Review revocable license agreement between Laurel Hills and Moy Toy, Inc.; E-mails with Wilson Buntin and Bill Reeves on meeting with TDEC officials
11215 06/28/2011	DLS	46158	0.20	\$250.00	\$ 50.00	E-mails with Wilson Buntin, Bill Reeves and Mike McClung on TDEC meeting
11215 06/30/2011	DLS	46158	6.00	\$250.00	\$ 1,500.00	Meet with Wilson Buntin, TDEC personnel, Bill Reeves and Mike McClung at Cookeville TDEC office; Prepare letter to Wilson Buntin confirming actions to be taken on water system and time frame for such actions
11215 07/01/2011	DLS	46313	0.50	\$250.00	\$ 125.00	Call with Mike McClung about letter to Wilson Buntin in follow up to meeting in Cookeville; Revise letter to Wilson Buntin and e-mail it to him; Call from Wilson Buntin for explanation of part of the letter
11215 07/06/2011	DLS	46313	0.20	\$250.00	\$ 50.00	Receive, review and respond to e-mail from Bill Reeves on motion to continue trial date
11215 07/12/2011	DLS	46313	1.00	\$250.00	\$ 250.00	Call with Rob Schwere on the Motion to Continue Trial and modifications to Motion and on the feasibility of getting civil penalty reduced; Review Motion and e-mail to Bill Reeves with suggested change in language in Motion
11215 07/21/2011	DLS	46313	0.30	\$250.00	\$ 75.00	Receive and review letter from Wilson Buntin requesting follow up from me to confirm that actions taken on the system as outlined in my previous letter are done
11215 08/18/2011	DLS	46418	0.30	\$250.00	\$ 75.00	Prepare e-mail to Mike McClung on compliance with steps set out in letter to Wilson Buntin
11215 09/06/2011	DLS	46588	0.50	\$250.00	\$ 125.00	E-mails with Wilson Buntin and Mike McClung on status of completion of work utility agreed to do
11215 09/15/2011	DLS	46588	0.40	\$250.00	\$ 100.00	Prepare e-mail to Mike McClung on status of corrective steps and prepare letter to Wilson Buntin on status
11215 09/16/2011	DLS	46588	0.30	\$250.00	\$ 75.00	Finalize letter to Wilson Buntin on status of corrective steps
11215 10/21/2011	DLS	46702	0.30	\$250.00	\$ 75.00	Receive and review letter from Wilson Buntin on compliance plan and forward to Mike McClung for a response
11215 10/27/2011	DLS	46702	0.50	\$250.00	\$ 125.00	E-mails with Wilson Buntin and Mike McClung on updating on correction steps
11215 10/31/2011	DLS	46702	0.40	\$250.00	\$ 100.00	Prepare letter to Wilson Buntin with update on correction plan
11215 12/01/2011	DLS	46930	0.70	\$250.00	\$ 175.00	Call to Wilson Buntin on progress in water system compliance and satisfactory sanitary survey and renew request that Chancery case be dismissed; Prepare e-mail to Mike McClung in follow up to call with Wilson Buntin
11215 12/02/2011	DLS	46930	0.40	\$250.00	\$ 100.00	Call with Bill Reeves in follow up to request to Wilson Buntin that State dismiss enforcement action; Prepare e-mail to Wilson Buntin on date pumps are to be placed into service
11215 12/05/2011	DLS	46930	0.20	\$250.00	\$ 50.00	Receive and review e-mails from Bill Reeves, Wilson Buntin and Mike McClung on status of operation of pumps and pending enforcement action
11215 12/15/2011	DLS	46930	0.30	\$250.00	\$ 75.00	Receive, review and respond to e-mail from Rob Schwere on pending TDEC enforcement case
11215 12/16/2011	DLS	46930	0.30	\$250.00	\$ 75.00	Receive, review and respond to e-mail from Rob Schwere on continuing to negotiate civil penalty issue with Wilson Buntin
11215 12/21/2011	DLS	46930	2.00	\$250.00	\$ 500.00	Calls with Wilson Buntin requesting against dismissal of civil penalty in TDEC pending enforcement action; Call with Rob Schwere and Mike McClung on how to proceed and on giving notice of suspension of service at end of January
11215 12/27/2011	DLS	46930	1.00	\$250.00	\$ 250.00	Research on whether accepting check indicating payment in full would be accepted as full payment if cashed; Call to Mike McClung on this issue and follow up with e-mail

Ex. B BSI Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO				
Matter:	11215	General Matters				
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215	12/29/2011	DLS	46930	2.20	\$250.00	\$ 550.00
						Prepare letter to Wilson Burlin to make one final request that the State dismiss civil penalty enforcement case. Revise water suspension letter and e-mail to Rob Schwerer and Mike McClung for review
11215	12/30/2011	DLS	46930	0.50	\$250.00	\$ 125.00
						Call with Rob Schwerer on water suspension letter. Revise water suspension letter and e-mail to Mike McClung and Rob Schwerer
11215	01/04/2012	DLS	47069	0.50	\$300.00	\$ 150.00
						Call with attorney Greg Young on meeting with water system customers; Call with Mike McClung on keeping TDEC informed of potential system shutdown
11215	01/11/2012	DLS	47069	0.30	\$300.00	\$ 90.00
						Call with Wilson Burlin on procedure for payment of civil penalty and court costs
11215	01/11/2012	RCHG	47069	0.10	\$100.00	\$ 10.00
						Call to Chancery Court on court costs paid by defendant
11215	01/19/2012	BG	47069	1.40	\$150.00	\$ 210.00
						Confer with counsel regarding case status; review prior service termination notice; draft and edit service termination notice; review file for relevant documents
11215	01/19/2012	DLS	47069	0.30	\$300.00	\$ 90.00
						Internal meeting with Ben Gastel on issues in dispute with Renegade Mountain residents
11215	01/23/2012	DLS	47069	1.50	\$300.00	\$ 450.00
						E-mails with Mike McClung and Dan Moore on John Moore changing electric accounts into his own name and prepare letter to Bobby Randolph to advise that John Moore had no authority or consent from Laurel Hills to do so
11215	01/23/2012	BG	47069	0.90	\$150.00	\$ 135.00
						Review correspondence from Laurel Hills; research contact information for Volunteer Electric; review Tennessee law regarding contacting public utilities for service; draft and edit letter to Volunteer Electric regarding accounts held by the Laurel Hills Property Owner's Association; confer with counsel regarding same
11215	01/24/2012	BG	47069	0.40	\$150.00	\$ 60.00
						Review correspondence and other documents relating to Mr. Moore's attempts to conspire with residents to stop paying utility bills; confer with counsel regarding this situation
11215	01/24/2012	DLS	47069	0.80	\$300.00	\$ 240.00
						Prepare second letter to customers on potential suspension of service and revised customer contract
11215	01/25/2012	DLS	47069	0.80	\$300.00	\$ 240.00
						Prepare e-mail to Mike McClung and Rob Schwerer on ability to pursue Moore for changing accounts and jurisdiction of TBI; Call to and e-mail to Tom White about representing Laurel Hills in claims against John Moore and other customers; Call from Dan Moore advising me of his representation of Moytoy in pending lawsuit on Community Club
11215	01/27/2012	DLS	47069	0.50	\$300.00	\$ 150.00
						Finalize second suspension notice and customer contract and e-mail to Mike McClung with information which may be needed if customers file a lawsuit challenging rates
11215	01/30/2012	DLS	47069	0.50	\$300.00	\$ 150.00
						Calls with Mike McClung and Rob Schwerer on cutting off Cumberland Point and status of electric meter accounts
11215	01/31/2012	DLS	47069	1.00	\$300.00	\$ 300.00
						Receive e-mail from Rob Schwerer on transfer of electric accounts; Call Harvey Cameron, attorney for Volunteer Electric; Call with Mike McClung, Rob Schwerer and Pudge Guettler regarding the procedures and related issues to turning the valve to shut off service to Cumberland Point
11215	02/01/2012	DLS	47149	3.10	\$300.00	\$ 930.00
						Prepare letter to Harvey Cameron on actions taken by John Moore to change name on VEC accounts to himself without Laurel Hills' consent and requesting accounts be change back; Calls with Harvey Cameron and Mike McClung on VEC accounts change; Receive, review and respond to e-mail from Rob Schwerer on VEC accounts change
11215	02/02/2012	DLS	47149	0.40	\$300.00	\$ 120.00
						Review second notice of suspension and customer contract draft and make suggested revisions
11215	02/03/2012	DLS	47149	6.70	\$300.00	\$ 2,010.00
						Meet with Mike McClung and Pudge Guettler; Prepare Mike McClung affidavit for temporary injunction hearing; E-mail Harvey Cameron questioning why VEC accounts were not transferred back the Laurel Hills; Receive and review TRO; Calls with Mike McClung and Harvey Cameron after receiving the TRO
11215	02/03/2012	BG	47149	1.90	\$150.00	\$ 285.00
						Confer with clients regarding recent developments on site; confer with counsel regarding possible solutions; confer with counsel regarding temporary restraining order obtained by the Laurel Hills Property Owners Association;
11215	02/04/2012	DLS	47149	1.00	\$300.00	\$ 300.00
						Call with Rob Schwerer about how to respond to TRO; Prepare Mike McClung affidavit; E-mail Ben Gastel on the TRO and our response

Ex. B BSJ Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATION				
Matter:	11215	General Matters				
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215 02/06/2012	DLS	47149	4.80	\$300.00	\$ 1,440.00	Call with Harvey Cameron confirming VEC accounts had been transferred back into name of Laurel Hills. Prepare e-mail to Sherwin Smith on illegal cross connection at Cumberland Point and turn off of valve serving Cumberland Point; Calls with Melanie Davis and Sherwin Smith about the TRO and turning the valve back on pending the hearing for a temporary injunction; E-mails with Mike McClung, Rob Schwere, Melanie Davis and Sherwin Smith on TRO and turning water back on to Cumberland Point; Review complaint filed by customers by Melanie Davis; Call to Chancellor Thurman's office; Prepare Mike McClung affidavit for temporary injunction hearing
11215 02/06/2012	BG	47149	1.20	\$150.00	\$ 180.00	Review documents related to filings to be made in state court; confer with court clerk regarding temporary restraining order; confer with counsel regarding case status and written filings; review Tennessee Rules of Civil Procedure regarding modifying the entry of a temporary restraining order; confer with counsel regarding modifying restraining order and obtaining temporary injunction; review complaint filed in Cumberland County court
11215 02/07/2012	BG	47149	4.20	\$150.00	\$ 630.00	Confer with counsel regarding response and preparation for Tuesday's hearing; research Tennessee law regarding granting and denying temporary injunction; review affidavits of Mike McClung; review complaint; draft and edit opposition to motion for temporary injunction; confer with the Court regarding Tuesday's hearing
11215 02/07/2012	DLS	47149	3.50	\$300.00	\$ 1,050.00	Call with Sherwin Smith on illegal cross connection and turning service back on for Cumberland Point; Prepare Motion to Dissolve TRO
11215 02/08/2012	DLS	47149	5.00	\$300.00	\$ 1,500.00	Meet with Tom White and George Dean; Prepare Mike McClung affidavit and Memorandum of Law for temporary injunction hearing; Call with and e-mail with Rob Schwere on temporary injunction hearing; Call with Chancellor Thurman to discuss procedure for temporary injunction hearing
11215 02/09/2012	DLS	47149	4.80	\$300.00	\$ 1,440.00	Calls with Mike McClung, Sherwin Smith and Dan Moore in preparation for temporary injunction hearing; Prepare affidavit for Sherwin Smith for temporary injunction hearing
11215 02/10/2012	DLS	47149	3.20	\$300.00	\$ 960.00	Finalize Sherwin Smith Affidavit for temporary injunction hearing and e-mail to him for his review and review his revisions to affidavit; Prepare Mike McClung affidavit and Memorandum of Law for temporary injunction hearing
11215 02/10/2012	BG	47149	3.30	\$150.00	\$ 495.00	Confer with counsel regarding written response; review email correspondence with clients; review affidavit of Mike McClung and TDEC representative; draft and edit written opposition to motion for temporary injunction; research TN law regarding granting and denying temporary injunction; research TN law regarding scope of duties of public utilities
11215 02/10/2012	RCHG	47149	0.30	\$100.00	\$ 30.00	Prepare cover letter to Cumberland County Clerk & Master
11215 02/11/2012	BG	47149	0.70	\$150.00	\$ 105.00	Prepare cover letter to Cumberland County Clerk & Master
11215 02/12/2012	BG	47149	1.40	\$150.00	\$ 210.00	Email correspondence with counsel regarding current version of written motion; draft and edit written opposition to motion for temporary injunction
11215 02/12/2012	DLS	47149	1.00	\$300.00	\$ 300.00	Research TN law regarding treatment of confiscatory rates as takings in violation of the U.S. Constitution; review email correspondence from counsel regarding same; draft and edit written opposition to motion for temporary injunction
11215 02/13/2012	DLS	47149	3.30	\$300.00	\$ 990.00	Prepare Mike McClung affidavit and Memorandum of Law for temporary injunction hearing
11215 02/13/2012	BG	47149	1.20	\$150.00	\$ 180.00	Finalize Memorandum of Law and affidavits for temporary hearing and prepare letter to Clerk and Master for filing
11215 02/14/2012	BG	47149	7.00	\$150.00	\$ 1,050.00	Review and edit final version of opposition to motion for temporary injunction; confer with counsel regarding same
11215 02/14/2012	DLS	47149	7.00	\$300.00	\$ 2,100.00	Travel to and attend hearing on motion for temporary injunction; confer with counsel regarding same; review pleadings filed by opposing counsel; review Tennessee law regarding scope of TRA authority
11215 02/14/2012	DLS	47149	1.00	\$300.00	\$ 300.00	Attend temporary injunction hearing in Crossville
11215 02/15/2012	DLS	47149	0.80	\$300.00	\$ 240.00	Call with Rob Schwere in followup to temporary injunction hearing; Call to General Counsel of TRA; Internal conference with Ben Gastel on terms of Chancellor Thurman's ruling
11215 02/16/2012	DLS	47149	0.40	\$150.00	\$ 60.00	Prepare letter to TRA General Counsel to advise that Laurel Hills may be filing a petition to obtain a certificate of public convenience and necessity in the future; Review draft of Order for temporary injunction prepared by Melanie Davis with Ben Gastel
11215 02/17/2012	BG	47149	0.40	\$150.00	\$ 60.00	Confer with counsel regarding order; review draft and final order; confer with opposing counsel regarding same
11215 02/22/2012	DLS	47149	0.80	\$300.00	\$ 240.00	Receive, review and respond to e-mail from Pudge Guetter on service of summons and complaint upon him; Call with Melanie Davis regarding a potential acquisition by Crab Orchard UD; Prepare e-mail to Rob Schwere on potential offer to Crab Orchard UD and on Amended Complaint showing additional parties
11215 02/22/2012	BG	47149	0.30	\$150.00	\$ 45.00	Confer with counsel regarding case status
11215 02/23/2012	RCHG	47149	0.20	\$100.00	\$ 20.00	Call to Clerk & Master on dates of service
11215 02/28/2012	BG	47149	0.30	\$150.00	\$ 45.00	Confer with counsel regarding case status; review Mike McClung affidavit; correspondence with opposing counsel regarding potential problems with added plaintiffs

Ex. B BJS Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO ASSOCIATION				
Matter:	11215	General Matters				
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215 02/28/2012	DLS	47149	0.40	\$300.00	\$ 120.00	Call Rob Schwere on potential conflict of Melanie Davis after adding Cumberland Point as a plaintiff and on options of how to proceed
11215 03/06/2012	RCHG	47415	0.10	\$100.00	\$ 10.00	Call to Clerk and Master on signed Order
11215 03/09/2012	DLS	47415	0.40	\$300.00	\$ 120.00	Call with George Dean; Conference with Ben Gastel to provide George Dean information he needed
11215 03/19/2012	BG	47415	3.20	\$150.00	\$ 480.00	Draft and edit counter claim and answer; confer with counsel regarding same; research TN law regarding affirmative defenses; research Tennessee law on tortious interference, breach of contract, and quasi-contract remedies; review local rules of Tennessee procedure; review application of rule 12 to amended complaint; confer with counsel regarding same
11215 03/20/2012	RCHG	47415	0.20	\$100.00	\$ 20.00	Prepare cover letter to Cumberland County Clerk & Master on filing Answer to Amended Complaint and Counterclaim
11215 03/20/2012	DLS	47415	1.00	\$300.00	\$ 300.00	Revise Answer and Counterclaim; E-mail client on next steps to take in regard to water system
11215 03/21/2012	DLS	47415	1.00	\$300.00	\$ 300.00	Call with Mike McClung and Rob Schwere on status of filing with TRA and pending court case and related issues; Revise letter to Melanie Davis from Ben Gastel
11215 03/21/2012	BG	47415	0.50	\$150.00	\$ 75.00	Confer with Melanie Davis regarding case status and regarding meter setting valves; review correspondence from Melanie; confer with counsel regarding same; confer with clients regarding same
11215 03/28/2012	BG	47415	0.40	\$150.00	\$ 60.00	Confer with opposing counsel regarding case status; review correspondence from opposing counsel; confer with Don Scholes regarding matter; confer with clients regarding differences in names between named plaintiff and Laurel Hills customers
11215 04/02/2012	BG	47536	0.50	\$150.00	\$ 75.00	Review correspondence regarding meter setters; review correspondence from Melanie Davis; draft notice to be sent to customers regarding upgrade to water system
11215 04/04/2012	DLS	47536	4.20	\$300.00	\$ 1,260.00	Prepare Petition for Certificate of Public Convenience and Necessity to the TRA
11215 04/05/2012	BG	47536	0.90	\$150.00	\$ 135.00	Draft and edit correspondence to Melanie Davis; review draft of petition to TRA; confer with counsel regarding petition
11215 04/05/2012	DLS	47536	0.40	\$300.00	\$ 120.00	Conference call with Ben Gastel on revising his letter to Melanie Davis and on TRA Petition
11215 04/08/2012	DLS	47536	2.50	\$300.00	\$ 750.00	Prepare tariff to file with the TRA Petition
11215 04/09/2012	DLS	47536	1.50	\$300.00	\$ 450.00	Prepare TRA Petition and tariff; E-mail draft of Petition to Rob Schwere and Mike McClung for review and an example of financial statement in form for TRA
11215 04/10/2012	DLS	47536	0.40	\$300.00	\$ 120.00	Finalize Petition and exhibits for filing
11215 04/10/2012	BG	47536	0.60	\$150.00	\$ 90.00	Review final petition; email correspondence with opposing counsel regarding petition
11215 04/18/2012	BG	47536	2.20	\$150.00	\$ 330.00	Conference call with client; review previous correspondence between counsel; review statutes on condemnation; confer with Melanie Davis regarding representations made by G. Moore in recent newsletter; confer with counsel regarding same
11215 04/18/2012	DLS	47536	1.50	\$300.00	\$ 450.00	Conference call with Mike McClung, Rob Schwere and Pudge Guettler on whether to cease providing service to all customer except to Laurel Hills itself; Internal conference with Ben Gastel on this course of action
11215 04/19/2012	BG	47536	0.30	\$150.00	\$ 45.00	Confer with counsel regarding case status; review Tennessee law on utility district's ability to exercise eminent domain powers
11215 04/23/2012	DLS	47536	0.50	\$300.00	\$ 150.00	Visit Renegade Mountain development with Mike McClung
11215 04/25/2012	BG	47536	0.30	\$150.00	\$ 45.00	Confer with counsel regarding correspondence from opposing counsel; review correspondence from opposing counsel
11215 04/26/2012	BG	47536	0.50	\$150.00	\$ 75.00	Review answer filed by plaintiffs; confer with counsel regarding same
11215 04/30/2012	DLS	47536	0.30	\$300.00	\$ 90.00	Prepare customer notice to go in May bill regarding cessation of service
11215 05/01/2012	BG	47657	0.60	\$150.00	\$ 90.00	Review Tennessee law regarding recovery under an injunction bond; confer with counsel regarding same
11215 05/02/2012	BG	47657	0.40	\$150.00	\$ 60.00	Confer with counsel regarding status of service in Cumberland County; review draft of cessation of service notice
11215 05/02/2012	DLS	47657	2.30	\$300.00	\$ 690.00	Prepare Notice to Withdraw; E-mails with Mike McClung and Rob Schwere on the notice; Internal conference with Ben Gastel on filing of notice and potential response by the TRA
11215 05/03/2012	DLS	47657	1.00	\$300.00	\$ 300.00	Conference call with Rob Schwere, Mike McClung and Pudge Guettler on filing of Notice to Withdraw and follow up after it is filedN
11215 05/07/2012	DLS	47657	2.20	\$300.00	\$ 660.00	Receive, review and respond to e-mail from Mike McClung on Johnny Walker's e-mail on customers reconnecting their service lines after valve is installed; Finalize Notice and transmittal letter to TRA and file with TRA; Finalize termination of service notice for customer; Prepare letter to TDEC Commissioner and Director of Division of Water Supply with termination of service notice

Ex. B BJS Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter:	11215	General Matters					
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative	
11215	05/07/2012	BG	47657	0.50	\$150.00	\$ 75.00	Review final versions of withdrawal of petition; review correspondence with opposing counsel; review final version of notice of cessation of service; confer with counsel regarding case status; file documents with the TRA
11215	05/09/2012	DLS	47657	0.20	\$300.00	\$ 60.00	Call from TRA General Counsel about Notice to Withdraw
11215	05/14/2012	DLS	47657	0.70	\$300.00	\$ 210.00	Call with Knoxville newspaper reporter and with Vance Broemel about withdrawal of Petition
11215	05/15/2012	DLS	47657	0.60	\$300.00	\$ 180.00	Call with Pudge Guettler to discuss the decision to withdraw the petition and its aftermath
11215	05/16/2012	DLS	47657	1.80	\$300.00	\$ 540.00	Prepare response to Notice to Appear before the TRA and e-mail to Rob Schwere for his review
11215	05/17/2012	DLS	47657	1.70	\$300.00	\$ 510.00	Revise response to Notice to Appear; Call with Rob Schwere about latest draft
11215	05/17/2012	RCHG	47657	0.40	\$100.00	\$ 40.00	Prepare cover letter to Sharla Dillon (TRA); File response, Email Co-counsel
11215	05/18/2012	DLS	47657	0.50	\$300.00	\$ 150.00	Finalize Response to Notice to Appear before the TRA
11215	05/21/2012	DLS	47657	0.50	\$300.00	\$ 150.00	Conference with Ben Gastel on attending TRA hearing and his report back to me; Prepare e-mail to Rob Schwere on the action taken at hearing
11215	05/21/2012	BG	47657	1.60	\$150.00	\$ 240.00	Confer with counsel regarding case status; review correspondence and filings with the TRA; attend TRA hearing; confer with counsel and client regarding hearing
11215	05/23/2012	DLS	47657	0.30	\$300.00	\$ 90.00	Conference with Ben Gastel on next step in responding to TRA action
11215	05/24/2012	DLS	47657	1.00	\$300.00	\$ 300.00	Review statutes on ability of TRA to impose civil penalties and call to Rob Schwere to discuss
11215	05/29/2012	BG	47657	0.90	\$150.00	\$ 135.00	Draft and edit letter to attorney general; confer with counsel regarding same
11215	06/01/2012	DLS	47802	2.20	\$300.00	\$ 660.00	Prepare letter to Jean Stone and Attorney General's Office to advise about the unconstitutionality of taking action against Laurel Hills now that it is only serving itself; E-mails with Rob Schwere on Melanie Davis letter to TRA and on appointment of hearing officer for show cause proceeding
11215	06/06/2012	BG	47802	0.30	\$150.00	\$ 45.00	Draft and edit letter to Melanie Davis; serve such letter; confer with counsel regarding same
11215	06/12/2012	DLS	47802	0.30	\$300.00	\$ 90.00	Internal conference with Ben Gastel on TRA statutory authority to impose civil penalties
11215	06/19/2012	BG	47802	0.30	\$150.00	\$ 45.00	Confer with counsel and client regarding TRA meeting tomorrow
11215	06/20/2012	BG	47802	1.60	\$150.00	\$ 240.00	Confer with client and counsel regarding meeting with TRA; attend meeting with TRA; research regarding ability of TRA to require a public utility to continue to serve public
11215	06/20/2012	DLS	47802	1.70	\$300.00	\$ 510.00	Call with Rob Schwere and Ben Gastel before meeting with Shiva Bozarth at the TRA; Meet with Shiva Bozarth and TRA staff members about withdrawal of Petition
11215	06/21/2012	DLS	47802	1.30	\$300.00	\$ 390.00	Receive, review and respond to e-mail from Rob Schwere on setting up call; Call with Rob Schwere on date of injunction hearing; effects of revocation of license granted to Laurel Hills by Moytoy and repossession of water system by Moytoy as holder of security interest
11215	06/22/2012	BG	47802	1.80	\$150.00	\$ 270.00	Review motions to compel; review local rules of MDTN regarding same; edit motions to compel; confer with counsel regarding filing of motions to compel
11215	06/22/2012	BG	47802	3.80	\$150.00	\$ 570.00	Research regarding federal and state law on public utility's duty to serve; confer with counsel regarding same; review Tennessee law regarding same
11215	06/25/2012	BG	47802	4.20	\$150.00	\$ 630.00	Research regarding Tennessee public utility law and law regarding injunctions; draft and edit response regarding same; review correspondence with client regarding same
11215	06/26/2012	DLS	47802	0.70	\$300.00	\$ 210.00	Receive, review and respond to e-mail from Rob Schwere on statute allowing termination of water service by public water system with notice; Internal conference with Ben Gastel to prepare for lawsuit to be filed by the TRA
11215	06/26/2012	BG	47802	3.20	\$150.00	\$ 480.00	Research regarding Tennessee public utility law; confer with client regarding Tennessee law and TRA authority; draft and edit response to preliminary injunction; research regarding same
11215	06/27/2012	DLS	47802	1.50	\$300.00	\$ 450.00	E-mail and call with Rob Schwere and conference with Ben Gastel about defending lawsuit to be filed by the TRA
11215	06/27/2012	BG	47802	1.30	\$150.00	\$ 195.00	Confer with counsel and client regarding status; review TRA show cause order; review research regarding TN law on public utilities
11215	06/28/2012	BG	47802	2.80	\$150.00	\$ 420.00	Confer with Shiva Bozarth at TRA regarding status of hearing and TRA's prepared actions; confer with counsel regarding same; confer with client regarding potential for TRO and preliminary injunction being filed; research Tennessee law regarding TRA's authority to obtain such relief; review documents provided by client
11215	06/28/2012	DLS	47802	0.30	\$300.00	\$ 90.00	Internal conference with Ben Gastel about contacting Shiva in preparation for filing of TRA lawsuit
11215	06/29/2012	BG	47802	1.40	\$150.00	\$ 210.00	Confer with clerk and Chancellor's secretary regarding TRO; review TRO; confer with client and counsel regarding same; review complaint; review Tennessee Rules of Civil Procedure regarding TRO and preliminary injunctions

Ex. B BSJ Response to Staff Data Request

Client: 004504	LAUREL HILLS CONDO. ASSOCIATIO					
Matter: 11215	General Matters					
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215	07/02/2012	BG	47953	6.50	\$150.00	\$ 975.00 Draft and edit opposition to motion for preliminary injunction; research regarding same; confer with counsel regarding same
11215	07/03/2012	BG	47953	6.80	\$150.00	\$ 1,020.00 Draft and edit opposition to motion for preliminary injunction; research Tennessee law regarding preliminary injunctions; review documents regarding same; review documents filed by TRA; confer with counsel regarding same
11215	07/05/2012	BG	47953	3.20	\$150.00	\$ 480.00 Confer with client regarding motion for preliminary injunction; draft and edit opposition to motion for preliminary injunction; draft affidavits regarding same; confer with counsel regarding same
11215	07/05/2012	DLS	47953	0.20	\$300.00	\$ 60.00 Conference with Ben Gastel on filing of response to motion for temporary injunction
11215	07/06/2012	BG	47953	0.70	\$150.00	\$ 105.00 Draft and edit opposition to motion to dismiss
11215	07/09/2012	BG	47953	3.80	\$150.00	\$ 570.00 Draft and edit opposition to motion for temporary injunction; research regarding same; confer with counsel regarding same; draft and edit affidavits; confer with clerk and court regarding filing; confer with opposing counsel regarding hearing and evidence
11215	07/09/2012	DLS	47953	1.90	\$300.00	\$ 570.00 Revise response to motion for temporary injunction by the TRA and conference with Ben Gastel on response
11215	07/10/2012	DLS	47953	0.40	\$300.00	\$ 120.00 Get file from Clerk and Master's Office in preparation for hearing on TRA motion for temporary injunction
11215	07/10/2012	BG	47953	4.20	\$150.00	\$ 630.00 Draft and edit and finalize opposition to motion for sanctions; confer with counsel regarding same; organize exhibits regarding same; confer with client regarding same
11215	07/11/2012	BG	47953	2.30	\$150.00	\$ 345.00 File complaint; research regarding same; confer with counsel regarding oral argument; prepare for oral argument
11215	07/11/2012	DLS	47953	0.30	\$300.00	\$ 90.00 Conference with Ben Gastel on hearing on TRA motion for temporary injunction
11215	07/12/2012	DLS	47953	7.00	\$300.00	\$ 2,100.00 Attend hearing in Crossville on TRA motion for temporary injunction
11215	07/12/2012	BG	47953	9.20	\$150.00	\$ 1,380.00 Travel to and attend hearing on opposition to motion for preliminary injunction; confer with client regarding same
11215	07/13/2012	DLS	47953	1.80	\$300.00	\$ 540.00 Research on TDEC permit of CPCA to operate sewer treatment plant and whether the system served persons other than CPCA; Prepare e-mail to Mike McClung and call with Rob Schweier on this issue
11215	07/16/2012	DLS	47953	0.30	\$300.00	\$ 90.00 Internal conference with Ben Gastel on how to proceed after issuance of temporary injunction
11215	07/17/2012	BG	47953	0.50	\$150.00	\$ 75.00 Confer with counsel for Crab Orchard Utility District regarding outstanding bill; confer with counsel regarding same
11215	07/18/2012	DLS	47953	0.30	\$300.00	\$ 90.00 Prepare tariff for filing for temporary rate approved by Chancellor and agreed to by the parties
11215	07/24/2012	DLS	47953	0.20	\$300.00	\$ 60.00 E-mail Notices of Reinstatement to all parties
11215	09/04/2012	BG	48306	3.20	\$150.00	\$ 480.00 Draft and edit motion for interlocutory appeal; research regarding same; confer with counsel regarding same; review previous correspondence regarding interlocutory appeal process; review Tennessee Rules of Appellate Procedure
11215	09/05/2012	DLS	48306	1.00	\$300.00	\$ 300.00 Revise Motion for Leave for Interlocutory Appeal
11215	09/25/2012	RCHG	48306	0.90	\$100.00	\$ 90.00 Call to Clerk & Master on hearing date; Prepare letter to Clerk on Notice of Appearance; Prepare Notice of Appearance
11215	10/22/2012	BG	48426	7.20	\$150.00	\$ 1,080.00 Travel to and attend hearing on motion for interlocutory appeal; confer with opposing counsel regarding case status; confer with counsel regarding case status
11215	11/20/2012	RCHG	48559	0.90	\$100.00	\$ 90.00 Proof and file LH Responses to 1st ROGS Posed by Petitioner and Response to 1st Request for Production; Prepare cover letter to Clerk & Master
11215	11/21/2012	RCHG	48559	0.50	\$100.00	\$ 50.00 Proof Answer to Petition for Injunctive Relief and cover letter to Clerk & Master
Fees Billed			236.40		\$ 52,700.00	
11215	01/16/2013	BG		0.30	150.00	45.00 Review intervention of CAD; confer with counsel regarding same
11215	01/17/2013	BG		0.40	150.00	60.00 Review agreed order regarding CAPD intervention; confer with counsel regarding same
11215	01/23/2013	BG		2.20	150.00	330.00 Research regarding motion to dismiss customer intervenor case; confer with opposing counsel regarding same
Fees Unbilled			468.40		\$ 435.00	
Total Fees			704.80		\$ 53,135.00	
11215	06/20/2011	0006	46158	\$ 46.50	Cash; Invoice # 6/17/11 Petty Cash; Printing Costs - copies of pleadings	
11215	07/01/2011	0008	46313	\$ 85.47	Scholes, Donald L.; Invoice # 07/01/2011; Mileage reimbursement to attend meeting with TDEC	
11215	02/14/2012	0041	47149	\$ 19.43	Scholes, Donald L.; Invoice # 02-14-2012; Reimburse cash receipt/lunch Cookeville	TRA Staff Data Request

Ex. B BSI Response to Staff Data Request

Client:	004504	LAUREL HILLS CONDO. ASSOCIATIO				
Matter:	11215	General Matters				
Matter	Date	Timek Bill	Hours	Rate	Amount	Narrative
11215	02/16/2012	0001	47149 \$	96.00	Clerk and Master; Invoice # 02162012; Fax Filing Fee for Response and Affidavits	
11215	02/16/2012	0008	47149 \$	143.19	Ben Gastel; Invoice # 02162012; Mileage reimbursement for travel to Cumberland County with DLS	
11215	02/29/2012	0006	47149 \$	1.00	Cash; Invoice # 02-29-12; Printing Costs - Copy of Order	
11215	03/26/2012	0001	47415 \$	100.00	Clerk and Master; Invoice # 03262012; Filing Fee for Answer and Counterclaim in Cumberland County	
11215	04/10/2012	0001	47536 \$	25.00	Tennessee Regulatory Authority; Invoice # 04102012; Electronic Filing Fee for Petition	
11215	07/16/2012	0001	47953 \$	115.00	Clerk and Master; Invoice # 07162012; Filing Fee for opposition to Motion for Temporary Injunction	
11215	07/20/2012	0009	47953 \$	125.00	Phyllis J. Stinson; Invoice # 6558; Court Reporting Fee	
11215	07/27/2012	0009	47953 \$	198.00	Phyllis J. Stinson; Invoice # 6562; Court Reporting Fee; 7/12/12, Cookeville, Chancery Court, 2012-CH-560	
11215	09/17/2012	0005	48306 \$	16.76	Federal Express; Invoice # 2-015-01079; Expedited Mail Charges on 9/6/12, to Cumberland County Chancery	
11215	12/07/2012	0009	48644 \$	84.00	Virgliene Tabor-Lotze; Invoice # 12072012; Court Reporting Fee; transcript of Findings of Fact	
11215	10/23/2012	0008	48426 \$	143.19	Ben Gastel; Invoice # Cash Receipts; Mileage for: Roundtrip to/from Cookeville	
11215	10/23/2012	0041	48426 \$	17.64	Ben Gastel; Invoice # Cash Receipts, Meals, B. Gastel, Cookeville	
Expenses Billed			\$1,216.18			