



## AlaFile E-Notice

02-CV-2023-901332.00

Judge: MICHAEL A YOUNGPETER

To: PATTON HAHN  
phahn@bakerdonelson.com

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

SYNOVUS CORPORATE TRUST V. WATER WORKS AND SEWER BOARD OF CITY OF PRIC  
02-CV-2023-901332.00

The following matter was FILED on 9/20/2024 2:51:35 PM

**O001 JOHN S YOUNG JR LLC**

RESPONSE TO MOTION TO DISBURSE FUNDS

[Filer: HAHN WILLIAM PATTON]

Notice Date: 9/20/2024 2:51:35 PM

SHARLA KNOX  
CIRCUIT COURT CLERK  
MOBILE COUNTY, ALABAMA  
CIRCUIT CIVIL DIVISION  
205 GOVERNMENT STREET 9TH FLOOR, N TOWER  
MOBILE, AL, 36644

251-574-8420

**IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA**

SYNOVUS CORPORATE TRUST,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 02-CV-2023-901332.00
	)	
WATER WORKS AND SEWER BOARD	)	
OF CITY OF PRICHARD,	)	
	)	
Defendant.	)	

**RECEIVER’S MEMORANDUM IN RESPONSE TO MOTION FOR ORDER TO PAY FEES FILED BY PARNELL THOMPSON, LLC ON BEHALF OF THE DEFENDANT, THE WATER WORKS AND SEWER BOARD OF THE CITY OF PRICHARD (“PWWSB”)**

COMES NOW John S. Young Jr. LLC, Court-appointed Receiver (“Receiver”) of the Prichard Water Works and Sewer Board of the City of Prichard (“PWWSB”), and files this memorandum in response to the Motion for Order to Pay Fees filed by Parnell Thompson, LLC (the “Parnell Firm”) on behalf of PWWSB. The Receiver states as follows in response to the Amended Motion:

1. On January 4, 2024, the Court entered an Order authorizing and directing the Receiver to pay Defendant’s legal fees and expenses in connection with only the pending appeal of the Receivership Order.

2. On January 17, 2024, counsel for Receiver sent an email to Mr. Mark Parnell requesting a budget for the anticipated legal fees and expenses for the appeal of the Receivership Order then pending before the Alabama Supreme Court. On January 30, 2024, Mr. Parnell responded and provided their estimate of \$80,000 for the costs associated with the appeal. Mr. Parnell copied his co-counsel, Jeffrey Hartley, on the email. *See Exhibit A.*

3. On June 2, 2024, Mr. Parnell emailed an invoice from his firm to counsel for the Receiver. A copy of the email and invoice is attached as Exhibit B. Unlike the Helmsing Firm, Mr. Parnell's invoice for \$16,146 was not redacted. From the Receiver's review it appears that the time entries are related to the appeal. However, when Parnell Firm's invoice is combined with the fees being sought by separate motion from the Helmsing Firm, the total fees for the appeal exceed the budgeted estimate by approximately \$56,000. The Receiver requests that the Court review the appellate fee requests from both firms together and direct the Receiver on the amounts to pay the respective firms.

4. The Motion also requests payment of certain invoices from the Parnell Firm for non-appeal related work in the amount of \$23,502.83 for work performed prior to December 1, 2023. The invoice that was submitted to the Receiver was redacted. Similar to the motion filed by the Helmsing Firm, the Receiver is requesting direction from the Court on whether this invoice should be paid. A copy of this invoice is attached as Exhibit C.

5. The Motion also requests an order directing the Receiver to pay three other vendors who were apparently engaged to provide legal assistance and/or consulting services in support of Defendant leading up to the appointment of the Receiver. The role of these firms was not described in the Motion. The Receiver has also not been able to locate an engagement agreement between any of the three firms and PWWSB. Although copies of the invoices from these firms were not attached to the Motion, copies are attached hereto for the Court's review as Exhibit D.

WHEREFORE, premises considered, the Receiver respectfully requests that the Court give it direction on which of the invoices should be paid, if any, and if so, in what amount(s), considering the limited funds available to the Receiver from System revenues.

Respectfully submitted this 20<sup>th</sup> day of September, 2024.



---

Joe A. Conner, Admitted *pro hac vice*  
*Counsel for the Receiver*

OF COUNSEL:

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
1901 Sixth Avenue North Suite 2600  
Birmingham, Alabama 35203  
Telephone (205) 328-0480  
Facsimile (205) 322-8007  
[jconner@bakerdonelson.com](mailto:jconner@bakerdonelson.com)  
[phahn@bakerdonelson.com](mailto:phahn@bakerdonelson.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 20<sup>th</sup>, 2024, the foregoing has been sent via this Court's electronic filing system to all counsel of record:

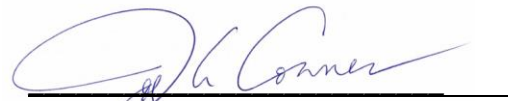
Jeffery J. Hartley  
HELMSING LEACH  
Post Office Box 2767  
Mobile, AL 36652  
[jjh@helmsinglaw.com](mailto:jjh@helmsinglaw.com)

Lue E. Sullivan, Sr.  
2204 Smiley Lane  
Prichard, AL 36610  
[Sullivanlue79@gmail.com](mailto:Sullivanlue79@gmail.com)

K. Mark Parnell  
Jeffery J. Hartley  
Keri R. Coumanis  
Rachel C. Buddrus  
PARNELL THOMPSON, LLC  
200 Office Park Drive, Suite 328  
Birmingham, AL 35223  
[parnell@ptlawllc.com](mailto:parnell@ptlawllc.com)  
[jjh@helmsinglaw.com](mailto:jjh@helmsinglaw.com)  
[krc@helmsinglaw.com](mailto:krc@helmsinglaw.com)  
[rbuddrus@helmsinglaw.com](mailto:rbuddrus@helmsinglaw.com)

Doug Jones  
Cissy Jackson  
ArentFox Schiff LLP  
1717 K Street NW  
Washington, DC 20006  
[doug.jones@arentfox.com](mailto:doug.jones@arentfox.com)  
[cissy.jackson@arentfox.com](mailto:cissy.jackson@arentfox.com)

Micah West  
SOUTHERN POVERTY LAW CENTER  
400 Washington Avenue  
Montgomery, AL 36014  
[micah.west@aplcenter.org](mailto:micah.west@aplcenter.org)

  
\_\_\_\_\_  
OF COUNSEL

# Exhibit A

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** K. Mark Parnell <parnell@ptlawllc.com>  
**Sent:** Tuesday, January 30, 2024 10:26 AM  
**To:** Conner, Joe <jconner@bakerdonelson.com>  
**Cc:** jjh@helmsinglaw.com  
**Subject:** Re: CV 2023-0901332: Synovus v Water Works and Sewer Board of the City of Prichard

Joe: Our best estimate for a budget for this appeal is \$80,000.00. It would be for this fiscal year.

I will respond separately to your request about my last invoice.

Thanks.

K. Mark Parnell  
200 Office Park Drive, Suite 328  
Birmingham, AL 35223  
O 205.582.2652 | D 205.582.2766  
[parnell@ptlawllc.com](mailto:parnell@ptlawllc.com) | [www.ptlawllc.com](http://www.ptlawllc.com)



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**From:** Conner, Joe <jconner@bakerdonelson.com>  
**Date:** Wednesday, January 17, 2024 at 9:07 AM  
**To:** K. Mark Parnell <parnell@ptlawllc.com>  
**Subject:** FW: CV 2023-0901332: Synovus v Water Works and Sewer Board of the City of Prichard

Hi Mark,

In light of the Judge's ruling regarding payment of the attorney fees incurred by the Board on the pending appeal, could you provide me with a budget for your anticipated legal fees and expenses for the appeal presently pending before the Alabama Supreme Court. If you could break it down to include anticipated fees from January 1, 2024 through the end of the fiscal year (Sept 30, 2024) and then for the first six months of the next fiscal year that would be extremely helpful.

The Receiver needs the estimate to include in the revised budget for the System that he is presently preparing.

In addition in your last invoice, all the time entries were redacted. The Receiver will need to review the entries to confirm that the fees are limited to the representation for the appeal. I will be glad to discuss this with you at your earliest convenience.

Thank you....

**Joe A. Conner, Esq.**

Baker, Donelson, Bearman, Caldwell & Berkowitz  
1900 Republic Centre  
633 Chestnut Street  
Chattanooga, TN 37450-1800  
Direct: 423.752.4417  
Cell: 423.605.2780  
E-mail: [jconner@bakerdonelson.com](mailto:jconner@bakerdonelson.com)  
[www.bakerdonelson.com](http://www.bakerdonelson.com)

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC  
represents clients across the U.S. and abroad from  
offices in Alabama, Florida, Georgia, Louisiana, Maryland,  
Mississippi, North Carolina, South Carolina, Tennessee,  
Texas, Virginia and Washington, D.C.

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# Exhibit B

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** K. Mark Parnell <parnell@ptlawllc.com>

**Sent:** Sunday, June 2, 2024 9:51 AM

**To:** Conner, Joe <jconner@bakerdonelson.com>

**Subject:** Re: FW: CV 2023-0901332: Synovus v Water Works and Sewer Board of the City of Prichard - Invoice for Receivership Order

Joe: Please find our firm’s invoice for the appeal of the Receivership Order. Please let me know if you have any questions.

K. Mark Parnell  
200 Office Park Drive, Suite 328  
Birmingham, AL 35223  
O 205.582.2652 | D 205.582.2766  
[parnell@ptlawllc.com](mailto:parnell@ptlawllc.com) | [www.ptlawllc.com](http://www.ptlawllc.com)



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PARNELL THOMPSON, LLC

Attorneys at Law

# INVOICE

Invoice # 441  
Date: 06/02/2024  
Due On: 07/02/2024

200 Office Park Drive, Suite 328  
Birmingham, Alabama 35223  
Phone: 205-582-2652  
Fax: 205-582-2815  
www.ptlawllc.com

The Water Works and Sewer Board of the City of Prichard  
125 East Clark Avenue  
P.O. Box 10455

Prichard, AL 36610

**1-00016**

## Synovus v. PWWSB (Appeal)

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	01/19/2024	MP	Update to client.	1.00	\$270.00	\$270.00
Service	01/22/2024	MP	Update to client.	1.50	\$270.00	\$405.00
Service	01/24/2024	MP	Assisting with motion to extend brief deadline.	0.75	\$270.00	\$202.50
Service	01/26/2024	MP	Communication with co-counsel;.	1.00	\$270.00	\$270.00
Service	01/31/2024	MP	Assisting with appeal.	2.40	\$270.00	\$648.00
Service	02/01/2024	MP	Working on brief.	2.75	\$270.00	\$742.50
Service	02/07/2024	MP	Conference with co-counsel re: brief; assisting with brief.	1.25	\$270.00	\$337.50
Service	02/16/2024	MP	T/c with co-counsel re: drafting brief.	0.50	\$270.00	\$135.00
Service	02/21/2024	MP	Working on brief.	3.00	\$270.00	\$810.00
Service	02/22/2024	MP	Assisting with drafting brief.	3.40	\$270.00	\$918.00
Service	02/23/2024	MP	Conference with client re: filed brief.	1.50	\$270.00	\$405.00
Service	02/26/2024	MP	Discussions re: possible amicus briefs.	3.75	\$270.00	\$1,012.50
Service	03/12/2024	MP	Assisting with reply brief.	2.00	\$270.00	\$540.00

Service	03/18/2024	MP	Working on reply brief.	2.50	\$270.00	\$675.00
Service	03/21/2024	MP	Receipt and ireview of Synovus' brief.	2.00	\$270.00	\$540.00
Service	03/22/2024	MP	Review of Synovus' brief.	2.50	\$270.00	\$675.00
Service	03/24/2024	MP	Working on reply brief.	3.50	\$270.00	\$945.00
Service	03/26/2024	MP	Working on Reply brief.	2.75	\$270.00	\$742.50
Service	03/27/2024	MP	Assisting with reply brief.	4.00	\$270.00	\$1,080.00
Service	03/28/2024	MP	Working on Reply brief.	3.00	\$270.00	\$810.00
Service	04/02/2024	MP	Working on Reply Brief.	5.00	\$270.00	\$1,350.00
Service	04/03/2024	MP	Continued work on Reply Breif.	2.50	\$270.00	\$675.00
Service	04/04/2024	MP	Assisiting with reply brief.	2.50	\$270.00	\$675.00
Service	04/09/2024	MP	Update to client regarding appeal.	1.25	\$270.00	\$337.50
Service	05/17/2024	MP	Receipt and review of opinion.	2.00	\$270.00	\$540.00
Service	05/23/2024	MP	Conference with client re: Opinion.	1.50	\$270.00	\$405.00

Time Keeper	Quantity	Rate	Total
Mark Parnell	59.8	\$270.00	\$16,146.00

**Subtotal**      **\$16,146.00**

**Total**      **\$16,146.00**

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
441	07/02/2024	\$16,146.00	\$0.00	\$16,146.00

**Outstanding Balance**      **\$16,146.00**

**Total Amount Outstanding**      **\$16,146.00**

Please make all amounts payable to: Parnell Thompson, LLC

Please pay within 30 days.

# Exhibit C



PARNELL THOMPSON, LLC

Attorneys at Law

# INVOICE

Invoice # 430

Date: 12/24/2023

Due On: 01/23/2024

200 Office Park Drive, Suite 328  
 Birmingham, Alabama 35223  
 Phone: 205-582-2652  
 Fax: 205-582-2815  
 www.ptlawllc.com

The Water Works and Sewer Board of the City of Prichard  
 125 East Clark Avenue  
 P.O. Box 10455

Prichard, AL 36610

**1-00014**

## Concession Agreement

Type	Date	Description	Quantity	Rate	Total
Expense	11/09/2023	[REDACTED]	1.00	\$270.31	\$270.31

Time Keeper	Quantity	Rate	Total
		Subtotal	\$270.31

**1-00015**

## Synovus Bank v. PWWSB (Receivership Lawsuit)

### Services

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	11/01/2023	MP	[REDACTED]	3.80	\$270.00	\$1,026.00
Service	11/02/2023	MP	[REDACTED]	5.20	\$270.00	\$1,404.00

				same.			
Service	11/03/2023	MP	[REDACTED]		2.70	\$270.00	\$729.00
Service	11/04/2023	MP	[REDACTED]		6.40	\$270.00	\$1,728.00
Service	11/06/2023	MP	[REDACTED]		3.25	\$270.00	\$877.50
Service	11/09/2023	MP	[REDACTED]		5.75	\$270.00	\$1,552.50
Service	11/10/2023	MP	[REDACTED]		3.00	\$270.00	\$810.00
Service	11/11/2023	MP	[REDACTED]		6.50	\$270.00	\$1,755.00
Service	11/12/2023	MP	[REDACTED]		3.70	\$270.00	\$999.00
Service	11/13/2023	MP	[REDACTED]		4.25	\$270.00	\$1,147.50
Service	11/17/2023	MP	[REDACTED]		1.75	\$270.00	\$472.50
Service	11/20/2023	MP	[REDACTED]		3.20	\$270.00	\$864.00
Service	11/21/2023	MP	[REDACTED]		3.30	\$270.00	\$891.00
Service	11/22/2023	MP	[REDACTED]		5.20	\$270.00	\$1,404.00
Service	11/23/2023	MP	[REDACTED]		1.00	\$270.00	\$270.00
Service	11/27/2023	MP	[REDACTED]		4.30	\$270.00	\$1,161.00
Service	11/28/2023	MP	[REDACTED]		4.00	\$270.00	\$1,080.00
Service	11/29/2023	MP	[REDACTED]		5.30	\$270.00	\$1,431.00
Service	11/30/2023	MP	[REDACTED]		8.00	\$270.00	\$2,160.00
						<b>Services Subtotal</b>	<b>\$21,762.00</b>

**Expenses**



Type	Date	Description	Quantity	Rate	Total
Expense	11/09/2023	[REDACTED]	1.00	\$281.00	\$281.00
Expense	11/09/2023	[REDACTED]	1.00	\$776.64	\$776.64
Expense	11/09/2023	[REDACTED]	1.00	\$412.88	\$412.88
<b>Expenses Subtotal</b>					<b>\$1,470.52</b>

Time Keeper	Quantity	Rate	Total
Mark Parnell	80.6	\$270.00	\$21,762.00
<b>Subtotal</b>			<b>\$23,232.52</b>
<b>Subtotal</b>			<b>\$23,502.83</b>
<b>Total</b>			<b>\$23,502.83</b>

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

Please make all amounts payable to: Parnell Thompson, LLC

Please pay within 30 days.

# Exhibit D



ABA Routing No:	062-005-690
For the Account of:	Butler Snow LLP (Formerly known as Butler, Snow, O'Mara, Stevens & Cannada, PLLC)
<i>(beneficiary)</i>	with Regions Bank, Jackson, MS
<b>Operating Account No:</b>	<b>500-21-032-80</b>
Contact:	Rance Sopen (601) 985-4554
Reference:	Prichard WWSB (152309) (Alston Ray)

In Account With  
**Ezell Law, LLC**  
 2700 Corporate Drive  
 Suite 200  
 Birmingham, Alabama 35242

(205) 314-4729  
 Tax ID 81-4919366

The Water Works and Sewer Board of the City of Prichard  
 Prichard, Alabama

October 24, 2023

**FOR LEGAL SERVICES** rendered as follows:

<b>DATE</b>	<b>ATTORNEY</b>	<b>DESCRIPTION</b>	<b>HOURS/RATE</b>	<b>AMOUNT</b>
3/28/23	MEE	Review of Piper presentation to Board	1.00/\$300	\$300.00
3/29/23	MEE	Review of draft Forbearance Agreement; related phone calls	1.70/\$300	510.00
4/3/23	MEE	Review of email messages	0.40/\$300	120.00
4/4/23	MEE	Participation in working group conference call; review of Trustee Funding Request	1.60/\$300	480.00
4/5/23	MEE	Participation in conference call with working group, Trustee and counsel to Trustee; related discussions; review of draft Forbearance Agreement	1.90/\$300	570.00
4/6/23	MEE	Sent comments on draft Forbearance Agreement to working group	0.40/\$300	120.00
5/2/23	MEE	Participation in working group conference call	0.50/\$300	150.00
5/3/23	MEE	Review of continuing disclosure agreement for 2019 Bonds; various email messages re: continuing disclosure matters	1.10/\$300	330.00
5/8/23	MEE	Email message re: continuing disclosure	0.30/\$300	90.00
5/9/23	MEE	Review and revision of Material Event Notice for draw on Reserve Fund; related email messages	1.70/\$300	510.00
5/16/23	MEE	Participation in working group conference call; review of various email messages	0.80/\$300	240.00
6/6/23	MEE	Participation in working group conference call; various related discussions	1.30/\$300	390.00
6/20/23	MEE	Participation in working group conference call	1.00/\$300	300.00
6/27/23	MEE	Participation in working group conference call; review of email messages	1.00/\$300	300.00
7/20/23	MEE	Research re: Chapter 9 bankruptcy requirements	0.50/\$300	150.00
8/9/23	MEE	Review of materials received by email; related call to Walter	0.70/\$300	210.00
8/15/23	MEE	Participation in working group conference call	0.70/\$300	210.00
8/22/23	MEE	Participation in working group conference call	1.00/\$300	300.00
8/24/23	MEE	Email messages	0.30/\$300	90.00

9/5/23	MEE	Participation in working group conference call	0.90/\$300	270.00
9/6/23	MEE	Review of draft resolutions to adopt budget and provide for rate increase	1.00/\$300	300.00
9/8/23	MEE	Comments on draft resolutions	0.40/\$300	120.00
9/13/23	MEE	Participation in conference call with other lawyers to discuss requirements for Chapter 9 bankruptcy filing; review of related materials	1.50/\$300	450.00
9/14/23	MEE	Review of various materials, including opinion from Jefferson County bankruptcy filing	0.60/\$300	180.00
9/18/23	MEE	Phone call to Parnell; research re: powers of the Board	1.40/\$300	420.00
9/19/23	MEE	Participation in working group conference call; review of Alabama procedures for allocation of state volume cap for private activity bonds	2.00/\$300	600.00
9/20/23	MEE	Drafted email message re: volume cap allocations for private activity bonds; phone call from Parnell; research re: communicating with bondholders	2.00/\$300	600.00
9/22/23	MEE	Phone calls from Walter and Mac	0.50/\$300	150.00
9/25/23	MEE	Review of draft Concession Agreement; various email messages and phone calls	1.40/\$300	420.00
9/26/23	MEE	Participation in working group conference call; research re: municipal bond tender offers	1.90/\$300	570.00
9/27/23	MEE	Research re: hedge bonds	1.00/\$300	300.00
10/3/23	MEE	Review of draft Concession Agreement and Letter of Intent; participation in working group conference call; various related phone calls and email messages	4.20/\$300	1,260.00
10/4/23	MEE	Drafted resolution authorizing Letter of Intent and initial tender offer activities; related email messages; review of materials provided by BondCom	3.40/\$300	1,020.00
10/5/23	MEE	Response to question from Parnell about changing use of 2019 bond proceeds; location of related document from 2019; review of proposed changes to Letter of Intent; made corresponding changes to related draft authorizing resolution	1.80/\$300	540.00
10/6/23	MEE	Revision of Board resolution to authorize Letter of Intent; related emails and phone calls; preparation of related minute excerpts for Board meeting	2.40/\$300	720.00
10/8/23	MEE	Review of emails pertaining to investments of bond proceeds; related email message to Parnell	0.40/\$300	120.00
10/9/23	MEE	Review of information from Mac about fund balances and fund investments; review of information about filing of petition with EPA	0.80/\$300	240.00
10/17/23	MEE	Participation in working group conference call; related research	1.10/\$300	330.00
10/20/23	MEE	Phone calls and email messages re: EMMA filings	0.80/\$300	240.00

**TOTAL AMOUNT DUE**

**\$14,220.00**



2100 SOUTHBRIDGE PARKWAY, SUITE 650  
 BIRMINGHAM, ALABAMA 35209  
 P 205.414.7511  
 Piper Sandler & Co.  
 Since 1895. Member SIPC and NYSE.

# INVOICE

TO: **The Water Works & Sewer of the City of Prichard, Alabama**  
**Attn: Chairman Russel Heidelberg**  
**125, East Clark Avenue**  
**Prichard, Alabama 36610**  
[russell72@comcast.net](mailto:russell72@comcast.net)

FROM: **Walter Lewis**

DATE: **18 October 2023**

**Consulting Services**

**\$79,206.00**

PAYABLE TO: Piper Sandler & Co. via the following wire instructions:

Receiving Bank Name:	U.S. Bank 1200 Energy Park Drive St. Paul, MN 55108
Receiving Bank Routing/ABA:	091 000 022
Bank Account Name:	Piper Sandler
Bank Account Number:	173103114547
For Further Credit to:	12000-370360
Originator to Beneficiary Information (OBI):	<b>FA Services – WWS of Pritchard AL</b>

To remit payment via Paper Check, please mail to:

Piper Sandler & Co.  
 PO Box 856284  
 Minneapolis, MN 55485-6284

Vendor: Please send copy of letter and/or invoice with check.

## Prichard Water Time

Dated: 10.17.23	per/ hr.	Hrs.			
Hourly Rate	\$ 275.00	239	\$ 65,794		Walter Lewis
	\$ 100.00	45	\$ 4,500		Drew Gilmore
	\$ 100.00	41	\$ 4,100		Spencer Sane
<b>Total</b>			<b>\$ 79,206</b>		

January	Start Time	Event	Hrs	Parties	Content
					Initial Trustee and Prichard Water Outlook, Lawsuits Settlement - Fire Hydrant , AMR, Alabama Village, Posting Information on Emma, Well Projects, MAWS Outfall, Asset Management Plan Discussion
1.27.23	9:00	Conference Call	1	Mac Underwood, Dean Matthews, Randal Braertor	
1.27.23	10:00	Conference Call	1	Mac Underwood, Russell Heidelberg	Discussed call with Trustee,
1.30.23	9:00	Calculations & Analysis	2	Drew Gilmore, Spencer Sane. Walter	
1.31.23	n/r	Call	1	Russell Heidelberg	Miscellaneous Discussion
1.31.23	n/r	Call	0.5	Mac Underwood	Miscellaneous Discussion
<b>February</b>					
2.13.23	n/r	Conference Call	0.5	Heidelberg, Mac, Mark Parnell, Jay, Jonathan, Greg Harris	Hydrant Settlement
2.14.23	n/r	Call	1	Russell Heidelberg	Miscellaneous Strategy, System Intel Discussion
2.14.23	n/r	Call	1	Greg Harry	Background and Fire Hydrant Settlement Discussion
2.15.23	n/r	Call	1	Mac Underwood	ADEM Discussion - Financial Support for the system
2.17.23	n/r	Call	1	Russell Heidelberg	Miscellaneous Strategy, System Intel Discussion
2.20.23	n/r	Analysis	1	Drew Gilmore, Spencer Sane. Walter	Document review - ADEM Report, Strategy Report created by Mac.



2.23.23	n/r	Board Meeting	1.5	PWSSB	Attended Prichard Water Board Meeting
2.23.23	n/r	Meeting Drive Time	8	PWSSB	Attended Prichard Water Board Meeting
2.27.23		Analysis	1	Drew Gilmore, Spencer Sane. Walter	Calculation of Available Revenue for D/S Payment in May & November
2.28.23		Meeting Drive Time	4.5	Stakeholders meeting (City , PWSSB, Mobile	
2.28.23	2:00	Weekly Call	1.5	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
March					
3.2-26.23		Rate Increase Analysis	24	Drew Gilmore, Spencer Sane. Walter	Revenue vs Debt Analysis Preparation for Meeting with Stakeholder
3.3.23	1:30	Conference Call	0.5	Synovus, Mac, Dean	Information call
3.6.23	9:00	Conference Call	1.5	Alston Ray, Jim Pietkiewicz, Mark Parnell, Jay Ros	Tender Discussion - Legal and Execution, Document Analysis
3.9.23	n/r	Board Meeting	1.5	PWSSB	Attended Prichard Water Board Meeting
3.9.23	n/r	Drive Time	8	PWSSB	Attended Prichard Water Board Meeting
3.14.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
3.17.23	3:30	Conference Call	1	Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	N?A
3.17.23	9:30	Call	1	Conversation with Mac	Discussion Documents, Agreement with City, Strategy, Forbearance Agreement
3.20.23	11:00	call	1.5	Conversation with Mac	Discuss Analysis for Presentation and Meeting
3.21.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
3.22.23	11:00	Conference Call	1	Mac, Trustee,	Conference call to discuss forbearance agreement, Construction fund, bondholder execution of rights

3.23.23	1:00	Meeting	2	Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer, Waggoner Engineering	Alabama Village Discussion & Report
3.24.23	n/r	Analysis	5	Piper Team	Stakeholders meeting preparation
3.27.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
3.29.23	11:00	Meeting	3	Stakeholders meeting (City , PWSSB, Mobile , County)	Meeting to discussion finding at Alabama Village & what to expect from Bondholders
3.29.23	11:00	Drive Time	8	Stakeholders meeting (City , PWSSB, Mobile , County)	Meeting to discussion finding at Alabama Village & what to expect from Bondholders
3.30.23	10:00	Conference Call	1	Mac , Mark Ezell, Jonathan, McCoy	Forbearance Agreement clarification
3.31.23	n/r	Conference Call	1.5	Mac. Jay,	MAWS Discussion relative to t Prichard Water, Community Dilemma Conversations, Schedule for Rate Increase
April					
4.3.23	n/r	call	0.5	Russell Heidelberg	Strategy Discussion
4.4.23	2:00	Weekly Call	1.5	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
4.4.23	n/r	Presentation Prep	8	Drew Gilmore, Spencer Sane. Walter	Prep for presentation to the Trustee
4.5.23	1:00	Zoom Call	1.5	Piper, PWSSB, Trustee	Presentation plan for PWSSB regarding increase
4.11.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
4.25.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Information and Accountability Meeting - Topics emailed to group
May					
5.2.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	City Settlement, Oppenheimer Transaction
5.15.23	1:30	Conference Call	1	Mac UNDERWOOD	Oppenheimer, KKR, Pension Fund

5.16.23	2:00	Weekly Call Russel	0.7 5	Discussion Oppenheimer, KKR, Approach taken regarding PWWSB, Chickasaw Discussion	Discussion Oppenheimer, KKR, Approach taken regarding PWWSB, Chickasaw Discussion
5.22.23	11:17	Heidelberg	0.5	Russell & Walter	Discussion KKR
5.23.23	2:00	Weekly Call	1.5	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Adem Audit, Oppenheimer - PWWSB Interest, Employees & Personnel Board ?
June					
6.1.23	3:30	Oppenheimer Call	1	Russell, Jay , Mac, Mark Parnell, Mark, Jonathan	Due Diligence Meeting Schedule, Timing,
6.4.23	n/r	Attorney's	1	Mark Ezell & Alston Ray Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Tender Option Discussions, Letter to Board, Can't have informal discussions to avoids being sued.
6.6.23	2:00	Weekly Call	1		Various Updates
6.8.23	n/r	Conference Call	0.5	KKR, Oppenheimer	Due Diligence, Logistics
6.13.23	n/r	Site Visit, Drive Time	12	KKR, Infamark, PWWSB, Personnel Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Meetings, Site Visits, Discussion, Pension Discussions, Employee Discussions
6.20.23	2:00	Weekly Call	0.5		Site Visit Recap
6.22.23	3:30	Oppenheimer Call	1	PWSSB, PWSSB Representatives, KKR, Oppenheimer	Site Visit Recap, Gage Interest in Proceeding,
6.27.23	2:00	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Agenda Discussion
July					
7.5.23	12:00	Oppenheimer Call	0.7 5	PWSSB, PWSSB Representatives, KKR, Oppenheimer	Discuss Potential Affects of Receivership, Options of their Involvement with PWWSB
7.6.23	1:00	PWSSB & Synovus Call	1	PWSSB, Synovus, Trustee Attorney's, PWSSB attorney's, Walter, Mac Underwood	Synovus vs PWSSB and Receivership
7.6.23	3:30	Oppenheimer call	1	PWWSB, Oppenheimer Group Water Partner, Infamark	Discussion Receiver & Concession impact
7.7.23	n/r	Management & Attorney's	1	Mac Underwood, Walter, Jay	Recap conversations

7.7.23	n/r	Mis. Conversations	8	Mis. Calls (December - July)	Side Conversations with Management, Attorney's, Trustee, etc.
7.15.23	n/r		2	PWSSB, PWSSB Representatives, KKR, Oppenheimer	PWWSB - Oppenheimer - KKR
7.20.23	3:30	Oppenheimer Call	1		Jeff Hartley Discussion, Mark Parnell discussion Bids process proposed
7.24.23	0:00	Prichard Water Call	1	Heidel, JR, MU, MP,ME, JM	Validity of Bankruptcy Court Hearing, Updates
7.27.23	n/r	Prichard Water Analysis	0.5	Analysis (Walter)	Projections for 2024 for Court Case Hearing.
7.29.23	5 - 10pm	Rate Analysis	5	Analysis (Walter)	Rate Analysis pertaining the 2024 budget
7.30.23	2-6pm	Rate Analysis	4	Analysis (Walter)	Rate Analysis pertaining the 2024 budget
7.31.23	6-9pm	Rate Analysis	3.5	Analysis (Walter)	Rate Analysis pertaining the 2024 budget
August					
8.7.23	n/r	Rate Analysis	3	Analysis (Walter)	Rate Analysis pertaining the 2024 budget
8.10.23	3-10pm	Rate Analysis	7	Analysis (Walter)	meeting with Mac, Format Completion, Rate Study Analysis, Expense Clarification
8.11.23	6-10pm	Rate Analysis	4	Drew Gilmore, Spencer Sane. Walter	Development of Presentation Model
8.12.23	5 -9pm	Analysis	4	Drew Gilmore, Spencer Sane. Walter	Development of Presentation Model
8.13.23	n/r	Analysis	6	Analysis (Walter)	Rate Study Analysis
8.15.23	n/r	Prichard	1	PWWSB call participants	PWWSB Updates
8.16.23	all day	meeting	14	Water Capital Partner, KKR, Board Members, Lega,, Inframark, Waggoner	discuss the particulars of the winning bid and next steps Updates of Call component parts, Nix Development, MAWS Request,
8.22.23	2	PWWSB c all	1.5	PWWSB call participants	
8.29.23	2	PWWSB c all	1	Update - PWWSB call Participants	
8.31.23	3:30	KKR group & PWSSB	1	KKR- Inframark Water Capital partners call	Streamline list of things to do before October 10th

8.31.23	n/r	Bondholder Analysis	1.5	Drew Gilmore, Spencer Sane. Walter	Compiling Bondholder information
September					
9.1.23	n/r	Bondholder Analysis	4	Drew Gilmore, Spencer Sane. Walter	Collected and arranged Data for all Prichard Water 2019 Bondholders
9.1.23	n/r	Mis. Conversations	2	Mis. Calls (August)	
9.5.23	2pm	PWWSB call	1	Settlement Agreement, Court Case, stakeholders meeting, Oppenheimer KKR, CNN Article	
9.6.23	3:30pm	Water Capital Partners	1.5	KKR & Water Capital Partners Model discussion	
9.7.23	3:30pm	KKR group & PWSSB	1	Work Stream Updates	
9.12.23	2pm	PWWSB meeting	3.5	Attended Board meeting	
9.14.23	1	PWWSB- Water Capital Partners	1	Conference Call	
9.19.23	1	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Weekly Agenda Updates
9.20.23	3:30pm	Oppenheimer Call	0.7 5	Vin, Mark Morehouse, Mac Underwood , Walter	Bondholder Discussion, minor details to discuss
9.21.23	3:30pm	PWWSb, WCP, Oppenheimer	1	Vin, Mark Morehouse, Mac Underwood , Walter, Rick, Sugarman	Model Discussion
9.26.23	2	PWWSB Weekly Call	1	Mark, Mark, Alston, Heidelberg, Hamilton, PWWSB Group	Weekly Agenda Updates
9.28-29.23	8:30 - 10:30	Prichard Meeting	2	Ken Rowey, Alston Ray, Mac Underwood, Mark Parnell,	Concession Agreement Discussion
October					
10.3.23	2pm	PWWSB Weekly Call	1.5	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Weekly Agenda Updates
10.10-11.23	r/a	PWWSB Court Hearing	16	Mobile Court & Judge	Receiver Hearing
10.16.23	8:30pm	Attorney's	1	Conference Call - appeal Discussion	Jeff Hartley, Mark Parnell, Jay, Mac, Keri,



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10.17.23	2pm	Weekly Call	1	Weekly Call - Russell, Jay , Mac, Mark Parnell, Mark, Jonathan, Drew, Spencer	Weekly Agenda Updates
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