

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE

\_\_\_\_\_) )  
IN THE MATTER OF: ) )  
Local Government Center, Inc., et al. ) C-2011000036  
RESPONDENTS ) )  
\_\_\_\_\_)

**HEALTHTRUST’S MOTION TO DISQUALIFY PRESIDING OFFICER**

HealthTrust, Inc. (“HealthTrust”) moves to disqualify the Presiding Officer from presiding over the New Hampshire Bureau of Securities Regulation’s Motion for Entry of Default Order pursuant to RSA 421-B:26-a, XI. As explained in HealthTrust’s contemporaneously filed memorandum of law in support of this motion to disqualify, the system pursuant to which the New Hampshire Secretary of State (“Secretary”) selected the Presiding Officer and the contract between the Secretary and the Presiding Officer violate HealthTrust’s right to due process pursuant to U.S. Const. amend. XIV and N.H. Const. part I, article 35.

WHEREFORE, HealthTrust requests that the Presiding Officer disqualify himself from presiding over the Motion for Entry of Default Order.

Respectfully submitted,

HEALTHTRUST, INC.

By Its Attorneys,

Dated: April 10, 2014

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**CERTIFICATE OF SERVICE**

I certify that I have forwarded copies of this pleading to counsel of record via email.

/s/ Michael D. Ramsdell  
Michael D. Ramsdell