

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE

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

**HEALTHTRUST’S MOTION FOR ORDER DIRECTING THE BSR TO PRODUCE CERTAIN BERNSTEIN SHUR ATTORNEYS AND PROFESSIONALS AND CERTAIN BSR ATTORNEYS AT HEARING ON REASONABLENESS OF ATTORNEYS’ FEES**

For the reasons stated in HealthTrust, Inc.’s (“HealthTrust”) contemporaneously filed memorandum of law, HealthTrust moves for an Order directing the New Hampshire Bureau of Securities Regulation (“BSR”) to produce: (1) certain attorneys and other professionals for whom the BSR seeks compensation in its demand for attorneys’ fees and costs; and (2) certain BSR attorneys who were present during some of the activities for which the BSR seeks compensation, during the hearing on the merits of the BSR’s demand. The hearing is scheduled to commence on November 17, 2014.

The BSR, through counsel, objects to the relief requested herein.

WHEREFORE, HealthTrust requests that the Presiding Officer issue an Order directing the BSR to produce the individuals who are listed on page 3 of HealthTrust’s contemporaneously filed memorandum of law, all of whom are attorneys and other professionals for whom the BSR seeks compensation in its demand for attorneys’ fees and costs or BSR attorneys who were present during some of the activities for which the BSR seeks compensation, during the hearing on the merits of the BSR’s demand.

Respectfully submitted,

HEALTHTRUST, INC.

Dated: November 6, 2014

By Its Attorneys,

/s/ Michael D. Ramsdell  
Michael D. Ramsdell (NH Bar #2096)  
Ramsdell Law Firm, P.L.L.C.  
46 South Main Street  
Concord, NH 03301  
(603) 856-7536  
mramsdell@ramsdelllawfirm.com

/s/ David I. Frydman  
David I. Frydman (NH Bar #9314)  
General Counsel  
HealthTrust, Inc.  
25 Triangle Park Drive  
P.O. Box 617  
Concord, NH 03302-0617  
603-230-3373  
dfrydman@healthtrustnh.org

**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