

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE  
BUREAU OF SECURITIES REGULATION**

<hr/> <b>IN THE MATTER OF:</b>	)	
Local Government Center, Inc.; et al.	)	Case Number: C-2011000036
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**LGC’S OBJECTION TO THE BUREAU OF SECURITIES REGULATION’S  
JANUARY 20, 2012 MOTION TO RECONSIDER ORDER ON  
MOTIONS TO COMPEL PRODUCTION**

Respondents Local Government Center, Inc. and affiliated entities (hereafter, “LGC”), object to the New Hampshire Bureau of Securities Regulation’s (hereafter, “BSR”) “Motion to Reconsider Order on Motions to Compel Production to the Extent Redactions Were Ordered to Protect the LGC’s Attorney Client Privilege as that Privilege Has Now Been Waived by the Assertion of Advice of Counsel Defenses (hereafter, the “Motion for Reconsideration”).

1. The Motion for Reconsideration cites no case law, makes no legal arguments, and provides no factual evidence. The Motion for Reconsideration is based entirely on arguments contained in a contemporaneously-filed motion.
2. A motion for reconsideration must state “points of law or fact that the Court has overlooked or misapprehended and shall contain such argument in support of the motion as the movant desires to present.” New Hampshire Rules of Superior Court, 59-A.
3. The Motion for Reconsideration identifies no point of law or fact that the Hearing Officer has overlooked. Nor does it contain any argument.
4. The Hearing Officer should deny BSR’s Motion for Reconsideration for these reasons alone.
5. To the extent the Hearing Officer permits the incorporation of arguments into the Motion for Reconsideration from the Bureau’s contemporaneous motion regarding the Attorney Client Privilege (“the Privilege Motion”), LGC’s arguments against the Privilege Motion should also be recognized as part of this objection. For the reasons asserted in LGC's objection to the Privilege Motion, then, this Motion for Reconsideration should be denied.

Respectfully submitted,

LOCAL GOVERNMENT CENTER, INC.;  
LOCAL GOVERNMENT CENTER  
REAL ESTATE, INC.;  
LOCAL GOVERNMENT CENTER  
HEALTHTRUST, LLC;  
LOCAL GOVERNMENT  
HEALTHTRUST, LLC;  
LOCAL GOVERNMENT CENTER  
PROPERTY-LIABILITY TRUST,  
LLC;  
HEALTHTRUST, INC.;  
NEW HAMPSHIRE MUNICIPAL  
ASSOCIATION PROPERTY-  
LIABILITY TRUST, INC.;  
LGC-HT, LLC; AND  
LOCAL GOVERNMENT CENTER  
WORKERS' COMPENSATION  
TRUST, LLC

By Their Attorneys:  
PRETI FLAHERTY BELIVEAU &  
PACHIOS, PLLP

Dated: February 3, 2012

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**CERTIFICATE OF SERVICE**

I certify that on the 3<sup>rd</sup> day of February, 2012, I forwarded copies of this pleading *via* E-mail to counsel of record.

/s/ William C. Saturley