

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE

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

**PROPERTY-LIABILITY TRUST, INC.’S PARTIALLY ASSENTED-TO
MOTION TO CLARIFY ORDER DENYING
MOTIONS TO DISMISS FOR LACK OF JURISDICTION**

Respondent Property-Liability Trust, Inc., by and through its attorneys, McLane, Graf, Raulerson & Middleton, Professional Association, requests the Hearing Officer to correct two facts set forth in the Order Denying Motions to Dismiss for Lack of Jurisdiction as follows:

1. At the top of page 2, the Order reads, “Under the terms of the administrative order PLT had been allowed approximately sixteen months to satisfy that provision of the order by December 31, 2013.” The correct date is December 1, 2013. In the Final Order, dated August 16, 2012, issued by the Hearing Officer, paragraph 17 of the Final Order reads, “The Local Government Center Property-Liability Trust, LLC, however it may be organized in the future, shall re-pay the \$17.1 million subsidy to the Local Government Center Health Trust risk pool management program, however it may be organized, no later than December 1, 2013.”

2. In the last paragraph of page 2, the Order reads, “In the later afternoon of Thursday, April 11, 2014, preceding the Monday April 14, 2014 scheduled hearing, respondents’ counsel submitted a written motion requesting the hearing officer to disqualify himself from conducting the hearing.” The motion requesting the hearing officer to disqualify himself from

conducting the hearing was filed by HealthTrust, Inc. and was not joined by Property-Liability Trust, Inc.

3. Counsel for Respondent, HealthTrust, Inc., was contacted and assents to the relief sought in this motion.

4. Counsel for Petitioner, the New Hampshire Bureau of Securities Regulation, was contacted and takes no position to the relief sought in this motion.

WHEREFORE, Property-Liability Trust, Inc. requests the Hearing Officer to:

A. At page 2 of the Order, modify the sentence as follows: “Under the terms of the administrative order PLT had been allowed approximately fifteen months to satisfy that provision of the order by December 1, 2013”; and

B. At page 2 of the Order, modify the sentence as follows: “In the later afternoon of Thursday, April 11, 2014, preceding the Monday April 14, 2014 scheduled hearing, HealthTrust, Inc.’s counsel submitted a written motion requesting the hearing officer to disqualify himself from conducting the hearing.”

Respectfully submitted,

PROPERTY-LIABILITY TRUST, INC.

By its attorneys,

MCLANE, GRAF, RAULERSON & MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: May 2, 2014

By: /s/ Bruce W. Felmly
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Certificate of Service

I hereby certify that on May 2, 2014, I forwarded a copy of this Motion to counsel of record via electronic mail.

/s/ Joel T. Emlen

Joel T. Emlen, NH Bar #17102