

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 NOTICE OF JOINDER TO
HEALTHTRUST, INC.’S OBJECTION AND STATEMENT OF ADDITIONAL
UNDISPUTED FACTS TO BSR’S MOTION FOR SUMMARY JUDGMENT**

Respondent Property-Liability Trust, Inc. (“PLT”), by and through its attorneys, McLane, Graf, Raulerson & Middleton, Professional Association, respectfully submits this Notice of Joinder to HealthTrust, Inc.’s Objection, and Statement of Additional Undisputed Facts in Support of the Objection, to the Motion for Summary Judgment filed by Petitioner, the New Hampshire Bureau of Securities Regulation (“BSR”). In support hereof, PLT states as follows:

1. Respondent HealthTrust, Inc. has filed an Objection to the BSR’s Motion for Summary Judgment. HealthTrust, Inc. also has filed a Statement of Additional Undisputed Facts in Support of its Objection to the BSR’s Motion for Summary Judgment.

2. Respondent PLT is filing this Notice to join in on HealthTrust, Inc.’s Objection and Statement of Additional Undisputed Facts, which are incorporated herein by reference.

WHEREFORE, Respondent PLT respectfully requests the Hearing Officer to:

- A. Accept this Notice of Joinder;
- B. Deny the BSR’s Motion for Summary Judgment; and
- C. Grant summary judgment to Respondents HealthTrust, Inc. and PLT and deny with prejudice the BSR’s Motion for Entry of Default Order.

Respectfully submitted,

PROPERTY-LIABILITY TRUST, INC.

By its attorneys,

MCLANE, GRAF, RAULERSON & MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: June 4, 2014

By: /s/ Bruce W. Felmly
Bruce W. Felmly, NH Bar #787
/s/ Joel T. Emlen
Joel T. Emlen, NH Bar #17102
900 Elm Street
Manchester, New Hampshire 03105
Telephone (603) 625-6464
bruce.felmly@mclane.com
joel.emlen@mclane.com

Certificate of Service

I hereby certify that on June 4, 2014, I forwarded a copy of this Notice of Joinder to counsel of record via electronic mail.

/s/ Joel T. Emlen
Joel T. Emlen, NH Bar #17102