

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE

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

**HEALTHTRUST’S MOTION TO DENY BSR’S REQUEST FOR ATTORNEYS’ FEES  
AND COSTS RELATED TO APPEAL**

For the reasons stated in HealthTrust, Inc.’s (“HealthTrust”) contemporaneously filed memorandum of law, HealthTrust moves to deny the New Hampshire Bureau of Securities Regulation’s (“BSR”) request for attorneys’ fees and costs related to the appeal of the above-captioned case.

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

WHEREFORE, HealthTrust requests that the Presiding Officer deny the BSR’s request for attorneys’ fees and costs related to the appeal of the above-captioned case.

Respectfully submitted,

HEALTHTRUST, INC.

By Its Attorneys,

Dated: November 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