

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 MOTION FOR SUMMARY JUDGMENT ON  
BSR’S MOTION FOR ENTRY OF DEFAULT ORDER**

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 Motion for Summary Judgment on the Motion for Entry of Default Order filed by Petitioner, the New Hampshire Bureau of Securities Regulation (“BSR”). In support hereof, PLT states as follows:

1. Respondent HealthTrust, Inc. has filed a Motion for Summary Judgment (and supporting materials) on the BSR’s Motion for Entry of Default Order.
2. Respondent PLT is filing this Notice to join in on HealthTrust, Inc.’s Motion for Summary Judgment, which is incorporated herein by reference.

WHEREFORE, Respondent PLT respectfully requests the Hearing Officer to:

- A. Accept this Notice of Joinder; and
- B. 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: May 9, 2014

By: /s/ Bruce W. Felmly  
Bruce W. Felmly, NH Bar #787  
/s/ Joel T. Emlen  
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**Certificate of Service**

I hereby certify that on May 9, 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