

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE

\_\_\_\_\_  
IN THE MATTER OF: )  
)

Local Government Center, Inc., et al. )

RESPONDENTS )  
\_\_\_\_\_ )

C-2011000036

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

HealthTrust, Inc. ("HealthTrust"), moves for summary judgment on the claims asserted in the Motion for Entry of Default Order filed by the Bureau of Securities Regulation ("BSR"). As reasons therefore, HealthTrust relies on (1) HealthTrust's Memorandum in Support of Motion for Summary Judgment on BSR's Motion for Entry of Default Order, (2) HealthTrust's Statement of Undisputed Facts, (3) the Affidavit of Peter J. Curro, and (4) the Affidavit of Dennis Pavlicek submitted herewith.

WHEREFORE, HealthTrust requests that the Presiding Officer grant summary judgment to HealthTrust denying the BSR's Motion for Entry of Default Order in its entirety.

Respectfully submitted,

HEALTHTRUST, INC.

By Its Attorneys,

Dated: May 9, 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