

# LURIE & KRUPP, LLP

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November 19, 2010

By Email and First-Class Mail

Joanne Ruel  
Executive Assistant  
New Hampshire Executive Council  
State House, Room 207  
107 N. Main Street  
Concord, NH 03301

Re: In re: Peter Hildreth, Docket No. 2010-002  
Before the Governor and the Executive Council

Dear Ms. Ruel:

Enclosed for filing please find the following (by email one copy and by first-class mail an original and eight copies):

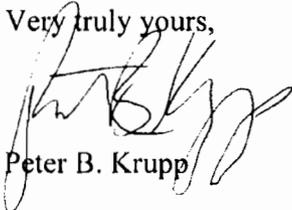
1. Motion *in Limine* to Exclude Evidence of Actions or Omissions by Individuals or Agencies, Other than Peter Hildreth or the Banking Department, with Jurisdiction Over, or the Power to Investigate, financial Resources Mortgage, Inc.;
2. Motion *in Limine* to Exclude Evidence of Peter Hildreth's Reputation, Testimony about his Prior good Works, and Opinions about his Character;
3. Motion *in Limine* to Require Offer of Proof of Testimony to be Offered by Witnesses;
4. Special Counsel's Witness List; and
5. Special Counsel's Exhibit List.

**LURIE & KRUPP, LLP**

Joanne Ruel  
Executive Assistant  
New Hampshire Executive Council  
November 19, 2010  
Page 2

Thank you.

Very truly yours,



Peter B. Krupp

PBK:kas

Enclosures

cc: Donald J. Perrault (w/enc., by email and first-class mail)  
Jeffrey A. Meyers (w/enc., by email and first-class mail)  
David L. Nixon (w/enc., by email to [ksimoneau@nixonraiche.com](mailto:ksimoneau@nixonraiche.com) and first-class mail)  
Karen Ladd (w/enc., by email and first-class mail)

STATE OF NEW HAMPSHIRE  
THE GOVERNOR AND THE EXECUTIVE COUNCIL

DOCKET NO. 2010-002

IN RE: PETER HILDRETH

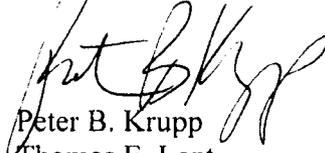
**MOTION *IN LIMINE* TO REQUIRE OFFER OF PROOF  
OF TESTIMONY TO BE OFFERED BY WITNESSES**

Special Counsel to the Governor and the Executive Council hereby moves *in limine* to require the parties to provide an offer of proof in writing of the general areas of the testimony expected to be offered by any witness the party intends to call, and to file and serve that written offer of proof at least 24 hours before the witness is to be called to testify. In support of this motion, Special Counsel states as follows:

Counsel for respondent Peter Hildreth (“Hildreth”) has produced a witness list with 110 potential witnesses. Those witnesses include people with no potentially relevant evidence to offer. To avoid a waste of time during this hearing, Special Counsel seeks an order that each party, at least 24 hours prior to offering a witness’ testimony, provide a written offer of proof of such witness’ general areas of expected testimony. This procedure will facilitate the parties stipulating to facts or testimony, will permit this body to bar witnesses who will offer no relevant evidence, and will assist in streamlining this hearing.

For these reasons, Special Counsel requests the Governor and the Executive Council to require the parties to provide an offer of proof in writing of the testimony expected to be offered by any witness the party intends to call, and to file and serve that written offer of proof at least 24 hours before the witness is to be called to testify.

Respectfully submitted,



Peter B. Krupp  
Thomas E. Lent  
Sara A. Laroche  
Lurie & Krupp, LLP  
One McKinley Square  
Boston, MA 02109  
Tel: 617-367-1970

Dated: November 19, 2010

Special Counsel to the Governor and  
the Executive Council

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on November 19, 2010 by email and by first-class mail to Donald J. Perrault, Jeffrey A. Meyers, David L. Nixon (email to [ksimoneau@nixonraiche.com](mailto:ksimoneau@nixonraiche.com), as requested) and Karen Ladd.



Peter B. Krupp