

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE
BUREAU OF SECURITIES REGULATION

IN THE MATTER OF:

Local Government Center, Inc; Local
Government Center Real Estate, Inc.;
Local Government Center HealthTrust,
LLC; Local Government Center
Property-Liability Trust, LLC;
Health Trust, Inc; New Hampshire
Municipal Association Property-Liability
Trust, Inc.; LGC-HT, LLC; Local
Government Center Workers'
Compensation Trust, LLC; and the
following individuals: Maura Carroll,
Keith R. Burke, Stephen A. Moltenbrey,
Paul G. Beecher, Robert A. Berry,
Roderick MacDonald, Peter J. Curro,
April D. Whittaker, Timothy J. Ruehr,
Julia N. Griffin and John Andrews

Case No: C-2011000036

**RESPONDENT JOHN ANDREWS' ASSENTED-TO MOTION
FOR MODIFICATION OF SCHEDULING ORDER**

Respondent John Andrews, by and through his counsel, Orr & Reno, P.A., moves for modification of the Scheduling Order dated December 14, 2011, as follows:

1. On December 14, 2011, Presiding Officer Mitchell issued the Scheduling Order (the "Order"). The Order followed an informal conference with counsel convened by Presiding Officer Mitchell on December 6, 2011.

2. Paragraph 6 of the Order states as follows:

Any expert not previously identified by the petitioner or the several respondents *as of the date of this order* shall not be allowed to provide evidence at hearing unless he or she is allowed by mutual agreement of all parties.

(Italics added).

3. The parties agree that the italicized portion of paragraph 6 does not accurately reflect the parties' agreement regarding expert disclosures that was approved by Presiding Officer Mitchell on December 6, 2011. Instead, the parties recall the discussion regarding expert disclosures as consistent with paragraphs 4 and 5 of the Order.

4. Paragraph 4 establishes a deadline of thirty (30) days following its completion of the on-site examination of the Local Government Center's (the "LGC") records for the New Hampshire Bureau of Securities Regulation (the "BSR") to produce its expert reports. Paragraph 6 establishes a deadline for the production of the Respondents' experts of February 17, 2011.

5. Accordingly, Mr. Andrews respectfully requests that paragraph 6 of the Order be modified as follows:

Any expert not identified and for whom an expert report is not produced by the following deadlines shall not be allowed to provide evidence at hearing unless he or she is allowed by mutual agreement of all parties: for the BSR - thirty (30) days following its completion of the on-site examination of the LGC's records; and for the Respondents - February 17, 2011.

6. All parties, through counsel, assent to the relief requested herein.

Prayer for Relief

Respondent John Andrews requests an Order modifying paragraph 6 of the Scheduling Order to state as follows:

Any expert not identified and for whom an expert report is not produced by the following deadlines shall not be allowed to provide evidence at hearing unless he or she is allowed by mutual agreement of all parties: for the BSR - thirty (30) days following its completion of the on-site examination of the LGC's records; and for the Respondents - February 17, 2011.

Respectfully Submitted,

JOHN ANDREWS

Date: 12/22/11

By: 

Michael D. Ramsdell, Esq. (NH Bar #2096)

Joshua M. Pantesco (NH Bar # 18887)

ORR & RENO, P.A.

One Eagle Square

P.O. Box 3550

Concord, NH 03302-3550

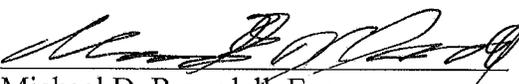
(603) 223-9185

mramsdell@orr-reno.com

jpantesco@orr-reno.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded this day via electronic mail to all counsel of record.


Michael D. Ramsdell, Esq.