

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE

IN THE MATTER OF:)
)
)
Local Government Center, Inc.;)
Government Center Real Estate, Inc.;)
Local Government Center Health Trust, LLC;)
Local Government Center Property-Liability Trust,)
LLC;)
Health Trust, Inc.;)
New Hampshire Municipal Association Property-Liability) Case No: C2011000036
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 A. Griffin; and John Andrews)
)
RESPONDENTS)
)

**MOTION TO ENLARGE TIME FOR SUBMISSION OF MOTION
REGARDING REPRESENTATION OF RESPONDENTS**

Petitioner, Bureau of Securities Regulation, a part of the Corporations Division within the Department of State, and submits this Motion to Enlarge Time for Submission of Motion Regarding Representation of Respondents, stating in support thereof as follows:

**Notice Was Given to Respondents Regarding Potential Concurrent Conflicts
Based on Improper Corporate and LLC Formation and Governance**

1. On October 3, 2011, the Bureau filed a Motion to Amend its September 2, 2011 petition to add a fourth count. In the motion, the Bureau alleged numerous errors in corporate and LLC formation and governance, on behalf of LGC, Inc. and its affiliated entities. The Bureau noted that such errors raise “substantial questions” regarding what individuals or entities had

or have management authority of the entities that purportedly house or housed these N.H. RSA § 5-B pooled risk management programs.

Research Relating to Application of Count 4 Factual Allegations to Representation of Respondents Could Not be Completed Prior to the Filing Deadline

2. On Thursday, October 6, 2011, an order was issued stating the Bureau was to “file any motion regarding any challenge relating to representation of any and all respondents or of designation of counsel no later than 7:00 PM, Monday October 10, 2011.”
3. Certain research related to these allegations and to the application of that research to the issues of representation of certain respondents was not completed until 10:35 AM, Tuesday, October 11, 2011.

WHEREFORE, the Petitioner respectfully requests that the Hearings Officer:

- A. Grant Petitioner’s Motion to Enlarge Time For Submission Of Motion Regarding Representation Of Respondents and order that the time for submission of motions regarding any challenge relating to representation of any and all respondents or of designation of counsel be extended until 5:00 PM, Tuesday, October 11, 2011, with response(s), if any, due no later than 5:00 PM, Friday, October 14, 2011.
- B. Grant such other and further relief, as may be deemed proper and just.

Dated this 11th day of October, 2011



Earle F. Wingate, III
Staff Attorney
N.H. Bureau of Securities Regulation

cc: Adrian S. LaRochelle, Esq.
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