

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )  
Plaintiff, )  
vs. ) C.A. No. 09-470-S  
JOSEPH CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC., HARRISON CONDIT, )  
and FORTUNE FINANCIAL SERVICES, )  
INC., )  
Defendants; )

TRANSAMERICA LIFE INSURANCE )  
COMPANY, )  
Plaintiff, )  
vs. ) C.A. No. 09-471-S  
JOSEPH CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC., ESTELA )  
RODRIGUES, EDWARD MAGGIACOMO, )  
JR., LIFEMARK SECURITIES CORP., and )  
PATRICK GARVEY, )  
Defendants; )

WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )  
Plaintiff, )  
vs. ) C.A. No. 09-472-S  
JOSEPH CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC., ADM ASSOCIATES, )  
LLC, EDWARD HANRAHAN, THE )  
LEADERS GROUP, INC., and CHARLES )  
BUCKMAN, )  
Defendants; )

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

vs. )

C.A. No. 09-473-S

JOSEPH CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC., DK LLC, EDWARD )  
HANRAHAN, THE LEADERS GROUP, )  
INC., and JASON VEVEIROS, )

Defendants; )

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

vs. )

C.A. No. 09-502-S

JOSEPH CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC., NATCO PRODUCTS )  
CORP., EDWARD HANRAHAN, and THE )  
LEADERS GROUP, INC., )

Defendants; )

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TRANSAMERICA LIFE INSURANCE )  
COMPANY, )

Plaintiff, )

vs. )

C.A. No. 09-549-S

LIFEMARK SECURITIES CORP., JOSEPH )  
CARAMADRE, RAYMOUR )  
RADHAKRISHNAN, ESTATE PLANNING )  
RESOURCES, INC. and EDWARD )  
MAGGIACOMO, JR., )

Defendants; and )

WESTERN RESERVE LIFE ASSURANCE	)	
CO. OF OHIO,	)	
Plaintiff,	)	
	)	
vs.	)	
	)	C.A. No. 09-564-S
JOSEPH CARAMADRE, RAYMOUR	)	
RADHAKRISHNAN, ESTATE PLANNING	)	
RESOURCES, INC., HARRISON CONDIT,	)	
and FORTUNE FINANCIAL SERVICES,	)	
INC.,	)	
Defendants.	)	
	)	

**STIPULATION**

Plaintiffs Western Reserve Life Assurance Co. of Ohio (“WRL”) and Transamerica Life Insurance Company (together “Plaintiffs”) and Defendants Estate Planning Resources, Inc., Joseph Caramadre, Raymour Radhakrishnan, Harrison Condit, Estela Rodrigues, ADM Associates, LLC (together the “Stipulating Defendants”) hereby agree that the Stipulating Defendants may have up to and including May 19, 2011 to file a reply memorandum to Plaintiffs’ Consolidated Objection to Defendants’ Motions for Reconsideration, Dismissal and for a More Definite Statement, which Plaintiffs filed on April 25, 2011.

/s/ Robert G. Flanders

Robert G. Flanders, Jr., Esq. No. 1785  
Eric S. Giroux, Esq. No. 7420  
Matthew H. Parker, Esq. No. 8111  
HINCKLEY, ALLEN & SNYDER, LLP  
Attorneys for Defendants  
Estate Planning Resources, Inc.,  
Joseph A. Caramadre,  
Raymour Radhakrishnan,  
Harrison Condit,  
Estela Rodrigues, and  
ADM Associates, LLC  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
(401) 274-2000 [Tel]  
(401) 277-9600 [Fax]  
[rflanders@haslaw.com](mailto:rflanders@haslaw.com)  
[egiroux@haslaw.com](mailto:egiroux@haslaw.com)  
[mparker@haslaw.com](mailto:mparker@haslaw.com)

/s/ Michael J. Daly

Brooks R. Magratten, Esq., No. 3585  
Michael J. Daly, Esq. No. 6729  
David Barry, Esq. *Pro Hac Vice*  
PIERCE ATWOOD LLP  
Attorneys for Plaintiffs  
Western Reserve Life Assurance Co. of Ohio  
Transamerica Life Insurance Company  
10 Weybosset St., Suite 400  
Providence, RI 02903  
(401)588-5113 [Tel.]  
(401)588-5166 [Fax]  
[bmagratten@pierceatwood.com](mailto:bmagratten@pierceatwood.com)  
[mdaly@pierceatwood.com](mailto:mdaly@pierceatwood.com)  
[dbarry@pierceatwood.com](mailto:dbarry@pierceatwood.com)

Dated: April 28, 2011

### **CERTIFICATION**

I hereby certify that on April 28, 2011, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Robert G. Flanders, Jr.