

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

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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;)		
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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;)		
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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;)		

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;)

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;)

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.)	
)	

**DEFENDANT ESTATE PLANNING RESOURCES, INC.’S (“EPR”) OBJECTION
TO PLAINTIFFS’ MOTION TO COMPEL EPR TO RESPOND TO
INTERROGATORIES**

Defendant Estate Planning Resources, Inc. (“EPR”) objects to Plaintiffs’ Motion to Compel EPR to Respond to Interrogatories (the “Motion”). The reasons for this objection are set forth in the accompanying memorandum of law.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys

/s/ Robert G. Flanders, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 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. _____