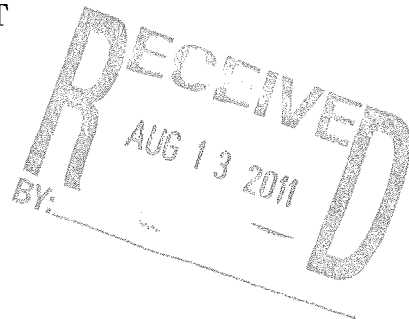


UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND



WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)
vs.)
JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., HARRISON CONDIT,)
and FORTUNE FINANCIAL SERVICES,)
INC.,)
Defendants.)

C.A. No.: 09-470-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Western Reserve Life Assurance Co. of Ohio's ("Western Reserve") First Set of Interrogatories ("Interrogatories") as follows:

Defendant reserves all objections as to the admissibility at trial of any response produced in response to these Interrogatories. Defendant's responses to these Interrogatories do not constitute admissions of any kind including that any Interrogatory is relevant to the subject matter of the pending litigation or reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to object to further inquiry including with regard to any subject matter, and does not concede that the definitions set forth herein are controlling as to any of the ultimate issues. All responses to these Interrogatories are provided for use in this litigation and for no other purpose.

Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

OBJECTIONS TO INSTRUCTIONS

A. EPR objects to the following instructions because they seek to impose obligations on EPR beyond those required by the Federal Rules of Civil Procedure and the Local Rules: 2, 3, 6, and 7.

INTERROGATORIES

Interrogatory 1:

Please identify every action EPR took in connection with the Annuity and Application, including:

- a. Steps to identify and/or recruit the Annuitant;
- b. Steps to identify and/or recruit the Owner;
- c. Steps to complete or facilitate the completion of the Application and obtain signatures thereon;
- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 2:

Please identify every communication EPR had with the Annuitant concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with the Owner concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of the Annuitant at the time the Application was submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 7:

Please identify how, why and when the Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with the Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be

required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
- d. All individuals with knowledge of such facts.

Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 10:

Please identify all owners, officers, directors, investors and employers of EPR since January 1, 2000.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 11:

Please identify all statements by EPR or any of its owners, directors and employees to every state and federal regulatory and/or law enforcement agency concerning variable annuities.

Answer to Interrogatory 11:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 12:

Please identify all communications EPR had with Plaintiff concerning the Application or Annuity and identify:

- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 12:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 13:

Please identify all communications EPR had with Plaintiff since January 1, 2011 identify:

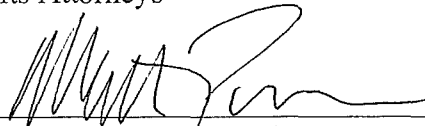
- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 13:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys



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Matthew H. Parker (# 8111)
Hinckley, Allen & Snyder LLP
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Providence, RI 02903
Telephone: (401) 274-2000
Facsimile: (401) 277-9600
Email: rflanders@haslaw.com
mparker@haslaw.com

CERTIFICATE OF SERVICE

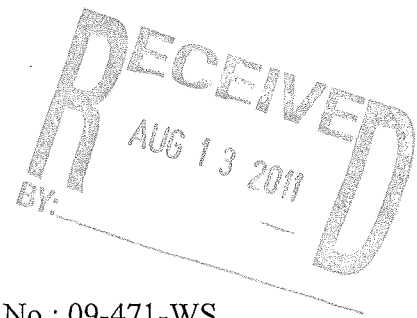
TO:

Brooks R. Magratten, Esq. Michael J. Daly, Esq. David E. Barry, Esq. Pierce Atwood LLP 10 Weybosset Street, Suite 400 Providence, RI 02903	Jeffrey S. Brenner, Esq. Armando E. Batastini, Esq. Nixon Peabody LLP One Citizens Plaza, Suite 500 Providence, RI 02903
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I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND



TRANSAMERICA LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

JOSEPH CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., ESTELA RODRIGUES,
EDWARD MAGGIACOMO, JR.,
LIFEMARK SECURITIES CORP., and
PATRICK GARVEY,

Defendants.

C.A. No.: 09-471-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Transamerica Life Insurance Company's ("Transamerica") First Set of Interrogatories ("Interrogatories") as follows:

Defendant reserves all objections as to the admissibility at trial of any response produced in response to these Interrogatories. Defendant's responses to these Interrogatories do not constitute admissions of any kind including that any Interrogatory is relevant to the subject matter of the pending litigation or reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to object to further inquiry including with regard to any subject matter, and does not concede that the definitions set forth herein are controlling as to any of the ultimate issues. All responses to these Interrogatories are provided for use in this litigation and for no other purpose.

Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

OBJECTIONS TO INSTRUCTIONS

A. EPR objects to the following instructions because they seek to impose obligations on EPR beyond those required by the Federal Rules of Civil Procedure and the Local Rules: 2, 3, 6, and 7.

INTERROGATORIES

Interrogatory 1:

Please identify every action EPR took in connection with the Annuity and Application, including:

- a. Steps to identify and/or recruit the Annuitant;
- b. Steps to identify and/or recruit the Owner;
- c. Steps to complete or facilitate the completion of the Application and obtain signatures thereon;
- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 2:

Please identify every communication EPR had with the Annuitant concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with the Owner concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of the Annuitant at the time the Application was submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 7:

Please identify how, why and when the Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with the Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be

required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
- d. All individuals with knowledge of such facts.

Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 10:

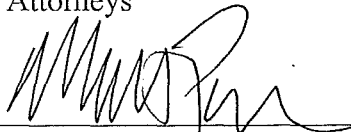
Please identify all communications you had with Plaintiff concerning the Application or Annuity and identify:

- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys



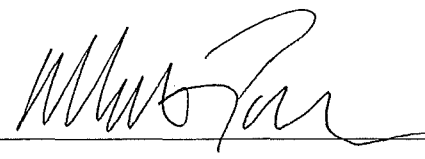
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mparker@haslaw.com

CERTIFICATE OF SERVICE

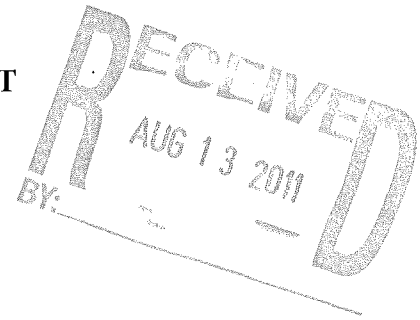
TO:

Brooks R. Magratten, Esq. Michael J. Daly, Esq. David E. Barry, Esq. Pierce Atwood LLP 10 Weybosset Street, Suite 400 Providence, RI 02903	Joseph V. Cavanagh, Jr., Esq. Mary Cavanagh Dunn, Esq. Blish & Cavanagh, LLP 30 Exchange Terrace Providence, RI 02903
Anthony M. Traini, Esq. Anthony M. Traini, P.C. 56 Pine Street Providence, RI 02903	

I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND



WESTERN RESERVE LIFE ASSURANCE
CO. OF OHIO,

Plaintiff,

vs.

JOSEPH CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., ADM ASSOCIATES,
LLC, EDWARD HANRAHAN, THE
LEADERS GROUP, INC., and CHARLES
BUCKMAN,

Defendants.

C.A. No.: 09-472-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Western Reserve Life Assurance Co. of Ohio's ("Western Reserve") First Set of Interrogatories ("Interrogatories") as follows:

Defendant reserves all objections as to the admissibility at trial of any response produced in response to these Interrogatories. Defendant's responses to these Interrogatories do not constitute admissions of any kind including that any Interrogatory is relevant to the subject matter of the pending litigation or reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to object to further inquiry including with regard to any subject matter, and does not concede that the definitions set forth herein are controlling as to any of the ultimate issues. All responses to these Interrogatories are provided for use in this litigation and for no other purpose.

Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

OBJECTIONS TO INSTRUCTIONS

A. EPR objects to the following instructions because they seek to impose obligations on EPR beyond those required by the Federal Rules of Civil Procedure and the Local Rules: 2, 3, 6, and 7.

INTERROGATORIES

Interrogatory 1:

Please identify every action EPR took in connection with the Annuity and Application, including:

- a. Steps to identify and/or recruit the Annuitant;
- b. Steps to identify and/or recruit the Owner;
- c. Steps to complete or facilitate the completion of the Application and obtain signatures thereon;
- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 2:

Please identify every communication EPR had with the Annuitant concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with the Owner concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

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Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of the Annuitant at the time the Application was submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

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Interrogatory 7:

Please identify how, why and when the Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with the Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

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Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
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Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

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Interrogatory 10:

Please identify all communications you had with Plaintiff concerning the Application or Annuity and identify:

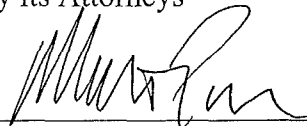
- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.

By its Attorneys



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CERTIFICATE OF SERVICE

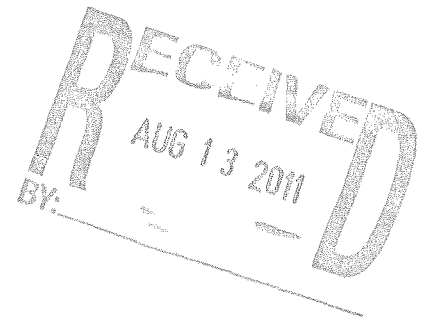
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I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND



WESTERN RESERVE LIFE ASSURANCE
CO. OF OHIO,

Plaintiff,

vs.

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

Defendants.

C.A. No.: 09-473-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Western Reserve Life Assurance Co. of Ohio's ("Western Reserve") First Set of Interrogatories ("Interrogatories") as follows:

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Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

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INTERROGATORIES

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- a. Steps to identify and/or recruit the Annuitant;
- b. Steps to identify and/or recruit the Owner;
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- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

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Interrogatory 2:

Please identify every communication EPR had with the Annuitant concerning the Annuity and Application and identify:

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Answer to Interrogatory 2:

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Please identify every communication EPR had with the Owner concerning the Annuity and Application and identify:

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Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

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Please explain EPR's understanding of the health condition of the Annuitant at the time the Application was submitted to Plaintiff:

- a. The basis of such understanding;
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Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
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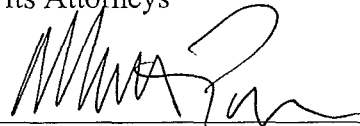
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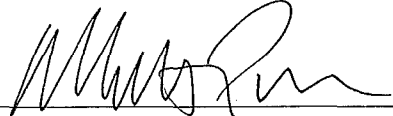
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mparker@haslaw.com

CERTIFICATE OF SERVICE

TO:

Brooks R. Magratten, Esq. Michael J. Daly, Esq. David E. Barry, Esq. Pierce Atwood LLP 10 Weybosset Street, Suite 400 Providence, RI 02903	R. Daniel Prentiss, Esq. R. Daniel Prentiss, P.C. One Turks Head Place Suite 380 Providence, RI 02903
John A. MacFadyen, Esq. C. Leonard O'Brien, Esq. MacFadyen, Gescheidt & O'Brien 101 Dyer Street, 3 rd Floor Providence, RI 02903	Deming E. Sherman, Esq. Edwards Angell Palmer & Dodge LLP 2800 Financial Plaza Providence, RI 02903
Douglas J. Friednash, Esq. Greenberg Traurig, LLP The Tabor Center 1200 17 th Street, Suite 2400 Denver, CO 80202	

I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND



WESTERN RESERVE LIFE ASSURANCE
CO. OF OHIO,

Plaintiff,

vs.

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

Defendants.

C.A. No.: 09-502-WS

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- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with the Owner concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning the Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of the Annuitant at the time the Application was submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 7:

Please identify how, why and when the Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with the Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be

required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
- d. All individuals with knowledge of such facts.

Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 10:

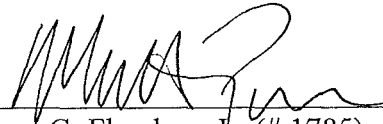
Please identify all communications you had with Plaintiff concerning the Application or Annuity and identify:

- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys



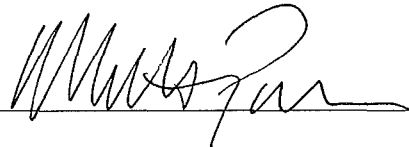
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CERTIFICATE OF SERVICE

TO:

Brooks R. Magratten, Esq. Michael J. Daly, Esq. David E. Barry, Esq. Pierce Atwood LLP 10 Weybosset Street, Suite 400 Providence, RI 02903	R. Daniel Prentiss, Esq. R. Daniel Prentiss, P.C. One Turks Head Place Suite 380 Providence, RI 02903
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Douglas J. Friednash, Esq. Greenberg Traurig, LLP The Tabor Center 1200 17 th Street, Suite 2400 Denver, CO 80202	

I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

TRANSAMERICA LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

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

Defendants.

C.A. No. 09-549-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Transamerica Life Insurance Company's ("Transamerica") First Set of Interrogatories ("Interrogatories") as follows:

Defendant reserves all objections as to the admissibility at trial of any response produced in response to these Interrogatories. Defendant's responses to these Interrogatories do not constitute admissions of any kind including that any Interrogatory is relevant to the subject matter of the pending litigation or reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to object to further inquiry including with regard to any subject matter, and does not concede that the definitions set forth herein are controlling as to any of the ultimate issues. All responses to these Interrogatories are provided for use in this litigation and for no other purpose.

Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

OBJECTIONS TO INSTRUCTIONS

A. EPR objects to the following instructions because they seek to impose obligations on EPR beyond those required by the Federal Rules of Civil Procedure and the Local Rules: 2, 3, 6, and 7.

INTERROGATORIES

Interrogatory 1:

Please identify every action EPR took in connection with the Annuity and Application, including:

- a. Steps to identify and/or recruit each Annuitant;
- b. Steps to identify and/or recruit each Owner;
- c. Steps to complete or facilitate the completion of each Application and obtain signatures thereon;
- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 2:

Please identify every communication EPR had with every Annuitant concerning every Annuity and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with every Owner concerning every Annuity and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning every Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with every Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of each Annuitant at the time the Applications were submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 7:

Please identify how, why and when each Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with each Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be

required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
- d. All individuals with knowledge of such facts.

Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 10:

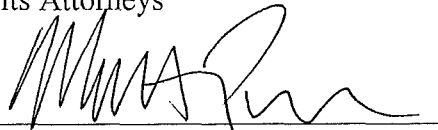
Please identify all communications you had with Plaintiff concerning each Application or Annuity and identify:

- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys



Robert G. Flanders, Jr. (# 1785)
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50 Kennedy Plaza, Suite 1500
Providence, RI 02903
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mparker@haslaw.com

CERTIFICATE OF SERVICE

TO:

Brooks R. Magratten, Esq. Michael J. Daly, Esq. David E. Barry, Esq. Pierce Atwood LLP 10 Weybosset Street, Suite 400 Providence, RI 02903	Joseph V. Cavanagh, Jr., Esq. Mary Cavanagh Dunn, Esq. Blish & Cavanagh, LLP 30 Exchange Terrace Providence, RI 02903
Anthony M. Traini, Esq. Anthony M. Traini, P.C. 56 Pine Street Providence, RI 02903	

I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.



**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

WESTERN RESERVE LIFE ASSURANCE
COMPANY OF OHIO,

Plaintiff,

vs.

JOSEPH CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., HARRISON CONDIT,
and FORTUNE FINANCIAL SERVICES,
INC.,

Defendants.

C.A. No. 09-564-WS

**DEFENDANT ESTATE PLANNING RESOURCES, INC.'S
ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Estate Planning Resources, Inc. ("EPR" or "Defendant") hereby responds to Plaintiff Western Reserve Life Assurance Co. of Ohio's ("Western Reserve") First Set of Interrogatories ("Interrogatories") as follows:

Defendant reserves all objections as to the admissibility at trial of any response produced in response to these Interrogatories. Defendant's responses to these Interrogatories do not constitute admissions of any kind including that any Interrogatory is relevant to the subject matter of the pending litigation or reasonably calculated to lead to the discovery of admissible evidence. Defendant reserves the right to object to further inquiry including with regard to any subject matter, and does not concede that the definitions set forth herein are controlling as to any of the ultimate issues. All responses to these Interrogatories are provided for use in this litigation and for no other purpose.

Defendant's responses represent Defendant's knowledge as of the date hereof.

Defendant's own investigation is continuing, however, and Defendant reserves the right to supplement, alter, and/or amend its responses.

OBJECTIONS TO INSTRUCTIONS

A. EPR objects to the following instructions because they seek to impose obligations on EPR beyond those required by the Federal Rules of Civil Procedure and the Local Rules: 2, 3, 6, and 7.

INTERROGATORIES

Interrogatory 1:

Please identify every action EPR took in connection with each Annuity and Application, including:

- a. Steps to identify and/or recruit each Annuitant;
- b. Steps to identify and/or recruit each Owner;
- c. Steps to complete or facilitate the completion of each Application and obtain signatures thereon;
- d. All documents concerning such actions; and
- e. All individuals with knowledge of such actions.

Answer to Interrogatory 1:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph

5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 2:

Please identify every communication EPR had with every Annuitant concerning every Annuity and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 2:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 3:

Please identify every communication EPR had with every Owner concerning every Annuity and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 3:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 4:

Please identify every communication EPR had with the Agent concerning every Annuity and Application and identify:

- a. All documents concerning such communications; and
- b. All witnesses to such communications.

Answer to Interrogatory 4:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 5:

Please identify all payments made to, or by, EPR in connection with the Annuity or Application.

Answer to Interrogatory 5:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 6:

Please explain EPR's understanding of the health condition of each Annuitant at the time the Applications were submitted to Plaintiff:

- a. The basis of such understanding;
- b. All documents concerning such understanding;
- c. All individuals with knowledge of such facts.

Answer to Interrogatory 6:

Because the only "officers" or "agents" of EPR who could possibly answer this interrogatory on behalf of EPR are "Target Defendants" as defined by Footnote 2 of the Court's Initial Case Management Order (the "ICMO"), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that "no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court"

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 7:

Please identify how, why and when each Annuitant was selected or identified as a potential candidate to serve as an annuitant in connection with each Annuity and identify:

- a. All documents concerning such facts;

b. All individuals with knowledge of such facts.

Answer to Interrogatory 7:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 8:

With respect to every interrogatory propounded by any party to this Action, please identify every individual and documents consulted to provide EPR’s response.

Answer to Interrogatory 8:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be

required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 9:

Please identify all application and marketing materials EPR received from any person concerning Plaintiff’s annuities and identify:

- a. When, why and how EPR obtained such materials;
- b. The person(s) who provided such materials;
- c. All documents concerning such facts;
- d. All individuals with knowledge of such facts.

Answer to Interrogatory 9:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court”

(emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

Interrogatory 10:

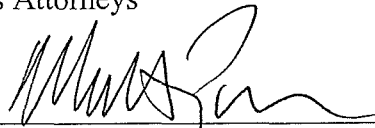
Please identify all communications you had with Plaintiff concerning each Application or Annuity and identify:

- a. All documents concerning such facts;
- b. All individuals with knowledge of such facts.

Answer to Interrogatory 10:

Because the only “officers” or “agents” of EPR who could possibly answer this interrogatory on behalf of EPR are “Target Defendants” as defined by Footnote 2 of the Court’s Initial Case Management Order (the “ICMO”), which the Court entered on September 10, 2010 and filed on September 13, 2010 (after it was submitted to the Court jointly by all of the parties on September 8, 2010), EPR hereby declines to respond to this interrogatory subject to Paragraph 5 of the ICMO, which states that “no Target Defendant shall propound interrogatories . . . nor shall any Target Defendant, whether on his own behalf or on behalf of an organization . . . be required to respond to any such interrogatories . . . until further order of the Court” (emphasis added). Accordingly, EPR also reserves any and all objections that it might have as to the form of this Interrogatory until further order of the Court.

ESTATE PLANNING RESOURCES, INC.
By its Attorneys



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CERTIFICATE OF SERVICE

TO:

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I certify that I mailed a true and accurate copy of the within Answers to First Set of Interrogatories to counsel of record, as set forth above, on August 12, 2011.