

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

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)

vs.)

C.A. No. 09-470-S

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

EMERGENCY MOTION

TRANSAMERICA LIFE INSURANCE)
COMPANY,)
Plaintiff,)

vs.)

C.A. No. 09-471-S

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

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)

vs.)

C.A. No. 09-472-S

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

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

C.A. No. 09-564-S

**ESTATE PLANNING RESOURCES, INC.’S EMERGENCY MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO INTERROGATORIES**

Defendant Estate Planning Resources, Inc. (“EPR”) moves this Court for an extension of time to comply with the Order of November 1, 2011 (Document No. 122 in Case 1:09-cv-00470-S-DLM) and respond to the interrogatories propounded on it by the plaintiffs in these seven related civil matters. EPR requests the Court to extend its time to comply with the Order by twenty (20) days and allow EPR up to and including December 12, 2011 to provide responses to the interrogatories.

EPR originally provided responses indicating that it would not respond to the interrogatories because the Initial Case Management Order prevented certain individual defendants from being compelled to answer interrogatories on its behalf. EPR asserted that certain of those defendants – Joseph A. Caramadre and Raymour Radhakrishnan – were the only people who could provide the information necessary to respond to the interrogatories. The plaintiffs moved to compel responses.

After hearing, the Court ordered, on November 1, 2011, that EPR must provide responses and laid out a procedure for how those responses should be crafted. That procedure calls for

EPR to designate an agent to answer the interrogatories. The Order further directs that agent to seek answers to the interrogatories that are available only from Target Defendants¹ and provide verbatim their responses. The current due date for such responses is November 22, 2011.

On November 17, 2011, the United States Attorney for the District of Rhode Island issued an indictment criminally charging Joseph A. Caramadre and Raymour Radhakrishnan. This intervening event has caused logistical problems for EPR in its efforts to comply with the Order. For example, EPR is having difficulty identifying a third-party agent willing to answer the interrogatories on its behalf. Moreover, Defendants Caramadre and Radhakrishnan are focused on the consequences of the indictment and unable to devote the necessary resources to assist EPR with responding to the interrogatories.

EPR contacted plaintiffs and requested that they assent to this motion. Plaintiffs were unwilling to do so without attaching conditions that are unacceptable to EPR. Accordingly, EPR respectfully requests this Court to grant the motion and extend the deadline for EPR to comply with the November 1, 2011 Order and answer the interrogatories to December 12, 2011.

Pursuant to Rule 9 of the Local Rules of the United States District Court for the District of Rhode Island, EPR respectfully requests an immediate hearing and expedited consideration of this motion. The current deadline for compliance with the Court's order is imminent, and EPR requires determination of this motion to avoid a failure to comply.

¹ The Target Defendants are Joseph Caramadre, Raymour Radhakrishnan, Edward Maggiacomo, Harrison Condit, and Edward Hanrahan.

Dated: Providence, Rhode Island
November 22, 2011

JOSEPH CARAMADRE and RAYMOUR
RADHAKRISHNAN,
By their Attorneys,

/s/ Adam M. Ramos
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 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/ Adam M. Ramos