

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

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

vs. )

C.A. No. 09-470-S

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

**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; )

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

vs. )

C.A. No. 09-473-S

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

Defendants; )

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

vs. )

C.A. No. 09-502-S

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

Defendants; )

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TRANSAMERICA LIFE INSURANCE )  
COMPANY, )

Plaintiff, )

vs. )

C.A. No. 09-549-S

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

Defendants; and )

WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )  
Plaintiff, )  
) )  
vs. )  
) )  
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 CONDITIONAL MOTION FOR APPOINTMENT OF AN AGENT TO ANSWER INTERROGATORIES**

Defendant Estate Planning Resources, Inc. (“EPR”) respectfully moves this Court on an emergency basis to appoint an agent to answer interrogatories on its behalf. EPR seeks this relief on a conditional basis in the event the Court does not grant the Emergency Renewed Motion for Partial Stay filed by Defendants Joseph Caramadre, Raymour Radhakrishnan, Estella Rodrigues and ADM Associates, LLC. The reasons for this motion are set forth in the accompanying memorandum.

Dated: Providence, Rhode Island  
December 5, 2011

ESTATE PLANNING RESOURCES, INC,  
By its Attorneys,

/s/ AdamM. Ramos  
Robert G. Flanders, Jr. (# 1785)  
Adam M. Ramos (#7591)  
HINCKLEY, ALLEN & SNYDER LLP  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
Telephone: (401) 274-2000  
Facsimile: (401) 277-9600  
Email: rflanders@haslaw.com  
aramos@haslaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 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* \_\_\_\_\_

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C.A. No. 09-470-S

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

**EMERGENCY MOTION**

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TRANSAMERICA LIFE INSURANCE )  
COMPANY, )  
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C.A. No. 09-471-S

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

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

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C.A. No. 09-472-S

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

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

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C.A. No. 09-473-S

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

Defendants; )

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WESTERN RESERVE LIFE ASSURANCE )  
CO. OF OHIO, )

Plaintiff, )

vs. )

C.A. No. 09-502-S

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

Defendants; )

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TRANSAMERICA LIFE INSURANCE )  
COMPANY, )

Plaintiff, )

vs. )

C.A. No. 09-549-S

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

Defendants; and )



answered completely through review of the books and records – and can only be answered with information available only to a Target Defendant - the Order requires the agent to follow a two-step process. First the agent must explain why the information is available only from a Target Defendant. Second, the agent must seek the information from the Target Defendant(s). Third, the agent must include the verbatim response of the Target Defendant(s) in the interrogatory responses. Fourth, the agent must obtain a written statement from the Target Defendant(s) setting forth the response. A copy of the November 1, 2011 Order is attached as Exhibit A. By rule, EPR’s deadline to provide the responses was November 22.

Joseph Caramadre – a Target Defendant – is the only person currently affiliated with EPR. *See* Declaration of Adam Ramos, Esq. (“Ramos Declaration”) at ¶ 4 (attached as Exhibit B). EPR no longer has any employees. *See* Ramos Declaration at ¶ 4. EPR began taking steps to prepare responses to the interrogatories immediately after the Court entered the November 1, 2011 Order. *See* Ramos Declaration at ¶ 5. EPR, through Mr. Caramadre, identified a third-party agent who agreed to prepare the responses. *See* Ramos Declaration at ¶ 6. EPR, through Mr. Caramadre, began working with that agent to prepare the responses by providing that agent with access to the books and records of EPR. *See* Ramos Declaration at ¶ 7.

On November 17, 2011, the United States Attorney for the District of Rhode Island (the “U.S. Attorney”) issued a 66-count indictment against Mr. Caramadre and Raymour Radhakrishnan. *See* Ramos Declaration at ¶ 8. EPR’s designated third-party agent was in the process of preparing answers to the interrogatories at the time the U.S. Attorney filed the indictment. *See* Ramos Declaration at ¶ 9. As a result of the indictment, the third-party agent was advised by counsel that he should no longer serve as EPR’s agent for purposes of answering the interrogatories. *See* Ramos Declaration at ¶ 10. Since the indictment, EPR, through Mr.



Caramadre, has been unable to find any person willing to serve as an agent to answer the interrogatories on EPR's behalf. *See* Ramos Declaration at ¶ 11.

EPR moved for an emergency extension of time to respond to the interrogatories on November 22, 2011. The Court granted that motion allowing EPR up to and including December 12, 2011 to provide answers. A copy of that order is attached as Exhibit C. Despite EPR's best efforts – through Mr. Caramadre – it has not been able to find a willing individual to serve as a third-party agent to answer the interrogatories. EPR must designate a third-party agent to answer the interrogatories to comply with the Court's November 1, 2011 Order.

Accordingly, EPR respectfully requests the assistance of the Court and asks the Court to appoint a third-party agent to answer the interrogatories on behalf of EPR. EPR's request is conditional. EPR requires this relief only if the Court denies the Emergency Renewed Motion for Partial Stay filed by Defendants Joseph Caramadre, Raymour Radhakrishnan, Estella Rodrigues and ADM Associates, LLC. If the Court grants that motion, EPR's obligation to answer the interrogatories will be stayed until the resolution of the criminal case and the relief requested in this motion will not be necessary at this time.

#### **Request for Emergency Consideration**

Emergency consideration of this motion is necessary because EPR's deadline to provide answers to the interrogatories is December 12, 2011. That date will pass before the Court resolves the motion if the Court follows the usual briefing schedule for motions.

Dated: Providence, Rhode Island  
December 5, 2011

ESTATE PLANNING RESOURCES, INC,  
By its Attorneys,

/s/ Adam M. Ramos  
Robert G. Flanders, Jr. (# 1785)  
Adam M. Ramos (#7591)  
HINCKLEY, ALLEN & SNYDER LLP  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
Telephone: (401) 274-2000  
Facsimile: (401) 277-9600  
Email: rflanders@haslaw.com  
aramos@haslaw.com

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/s/ Adam M. Ramos