

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

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

DEFENDANT EDWARD L. MAGGIACOMO, JR.’S
MOTION TO JOIN IN AND ADOPT EMERGENCY RENEWED MOTION
FOR PARTIAL STAY FILED BY DEFENDANTS CARAMADRE ET ALS.

Defendant Edward L. Maggiacomo, Jr. (“Maggiacomo”) hereby joins in and adopts the Emergency Renewed Motion For Partial Stay of the within proceedings filed this date on behalf of defendants Caramadre, et als. (See Document 125 filed in C.A. No. 09-470-S).

The arguments made in support of the Caramadre motion are equally applicable to Mr. Maggiacomo, despite the fact that he has not himself been indicted in the criminal case.

WHEREFORE, for the foregoing reasons and for those set forth in the pleadings filed by the other defendants (all of which are incorporated herein), and such reasons as shall be advanced at hearing, Mr. Maggiacomo moves that the within actions be stayed as to him pending the outcome of the criminal proceedings against Mr. Caramadre and Mr. Radhakrishnan.

EDWARD L. MAGGIACOMO, JR.

By his Attorney,

/s/ Anthony M. Traini

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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2011, a copy of the within document 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/ Anthony M. Traini

Anthony M. Traini