

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

WESTERN RESERVE LIFE ASSURANCE)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

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

CONREAL LLC, HARRISON CONDIT,)
FORTUNE FINANCIAL SERVICES, INC.,)
and ANTHONY PITOCCO,)
Defendants;)

TRANSAMERICA LIFE INSURANCE)
COMPANY,)
Plaintiff,)

vs.)

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

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

WESTERN RESERVE LIFE ASSURANCE)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

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

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)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

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

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

WESTERN RESERVE LIFE ASSURANCE)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

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

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-WS

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

_____)	
)	
WESTERN RESERVE LIFE ASSURANCE)	
COMPANY OF OHIO,)	
Plaintiff,)	
)	
vs.)	
)	C.A. No. 09-564-WS
JOSEPH CARAMADRE, RAYMOUR)	
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC., HARRISON CONDIT,)	
and FORTUNE FINANCIAL SERVICES,)	
INC.,)	
Defendants.)	
_____)	

INITIAL CASE MANAGEMENT ORDER

The parties having conferred among counsel and with the Court, and pursuant to the parties’ agreement, the Court now orders:

1. The Plaintiffs in the above-captioned cases shall file any Amended Complaints or Second Amended Complaints (“Complaints”) on or before September 7, 2010. The Defendants shall have until October 4, 2010 to respond to these and any other complaints in the above captioned cases.

2. If any Defendant files and serves a motion under Rule 12¹ (“Motion to Dismiss”), the Plaintiff in any such case shall file and serve a response to such motion, including any objection and supporting memorandum, within thirty (30) days after service of the motion. After the service of any such objection, the movant(s) may file and serve a reply memorandum within fourteen (14) days.

3. Within seven (7) days of a ruling by the Court denying in whole or in part any Motion to Dismiss, the Defendants in such case shall file and serve their answers

¹All Rule references are to Federal Rules of Civil Procedure.

to the Complaints, including any compulsory counterclaims, except that the Target Defendants² shall serve only, upon all parties, draft answers to the Complaints, which shall not be required, at that time, to include any compulsory counterclaims.

4. Notwithstanding the pendency of any Motions to Dismiss, the parties may forthwith propound requests for production pursuant to Rule 34 to all other parties in their respective cases. Responses by all parties shall be in accordance with Rule 34(b)(2), except that the Target Defendants shall respond to any such requests pursuant to an agreement between their counsel and counsel for all other parties concerning the source and authentication of the documents produced. In the event that any party receives a request or demand, whether or not by subpoena, for any of the documents produced by the Target Defendants, such party shall immediately notify in writing all Target Defendants of such request or demand, and withhold compliance with any such request or demand for a period of fourteen (14) days in order to allow the Target Defendants to seek an appropriate non-disclosure order from the Court. Once the Target Defendants have applied for such an order within the fourteen (14) day period, such documents shall not be delivered or produced in response to any such request or demand without further order of the Court. If the Target Defendants fail to seek a non-disclosure order or other protection from the Court within fourteen (14) days of receipt of written notification of the request or demand for documents produced by the Target Defendants, the party which has received the request or demand shall be under no obligation to withhold production of the documents.

²The "Target Defendants" shall refer to Joseph Caramadre, Raymour Radhakrishnan, Edward Maggiacomo, Harrison Condit, and Edward Hanrahan.


5. Notwithstanding the pendency of any Motions to Dismiss, the parties may forthwith propound interrogatories pursuant to Rule 33, requests for admission pursuant to Rule 36, and notice the deposition of any party, or of any third party witness, whether pursuant to Rule 30 or Rule 31, except that no Target Defendant shall propound interrogatories or requests for admission, or notice any such deposition, nor shall any Target Defendant, whether on his own behalf or on behalf of an organization pursuant to the procedures outlined in Rule 30(b)(6) or Rule 31(a)(4), be required to respond to any such interrogatories or requests for admission, nor be noticed or subpoenaed for any deposition, orally or in writing, until further order of the Court; provided that any Target Defendant may participate by attendance and cross-examination in any deposition of any other party or third party witness noticed by any other party.

6. Proposed depositions of any "measuring life" or "annuitant" shall continue to be governed by the conditions outlined in Magistrate Judge Martin's October 27, 2009 Order, which this Court adopted by reference in its Scheduling Order dated December 21, 2009, subject to such Order being modified by agreement of the parties and approval of the Court.

7. During the week of January 2, 2011, the Court shall hold a chambers conference with all parties to discuss the status of the cases and the progress of discovery.

Dated: September 7, 2010.

Entered as an Order of the Court this 10th day of September 2010.



William E. Smith
United States District Judge