

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.)	
)	C.A. No. 09-564-S
JOSEPH CARAMADRE, RAYMOUR)	
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC., HARRISON CONDIT,)	
and FORTUNE FINANCIAL SERVICES,)	
INC.,)	
Defendants.)	
)	

**DECLARATION OF ADAM RAMOS, ESQ. IN SUPPORT OF
DEFENDANT ESTATE PLANNING RESOURCES, INC'S EMERGENCY MOTION
FOR APPOINTMENT OF AN AGENT TO ANSWER INTERROGATORIES**

I, Adam M. Ramos, being duly sworn, do depose and say as follows:

1. I am an associate in the firm of Hinckley, Allen & Snyder LLP, which is located at 50 Kennedy Plaza, Suite 1500, Providence, RI 02903. My office telephone number is (401) 457-5164.

2. I am admitted to practice before, and am a member in good standing of, the Bar of the State of Rhode Island, Bar of the Commonwealth of Massachusetts, the United States District Court for the District of Rhode Island, the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit, and the United States Court of Appeals for the Federal Circuit.

3. I represent Defendant Estate Planning Resources in these civil proceedings, and I have personal knowledge of the facts stated herein

4. Joseph Caramadre – a Target Defendant – is the only person currently affiliated with EPR. EPR no longer has any employees.

5. EPR began taking steps to prepare responses to the interrogatories propounded to it by Plaintiffs Western Reserve Life Assurance Company of Ohio (“WRL”) and Transamerica Life Assurance Company (“TLA”) in this matter immediately after the Court entered the November 1, 2011 Order directing EPR to do so.

6. EPR, through Mr. Caramadre, identified a third-party agent who agreed to prepare the responses.

7. 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.

8. 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.

9. 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.

10. 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.

11. 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.

Signed under the penalties of perjury this 5th day of December, 2010.

/s/ Adam M. Ramos
Adam M. Ramos

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