

EXHIBIT A

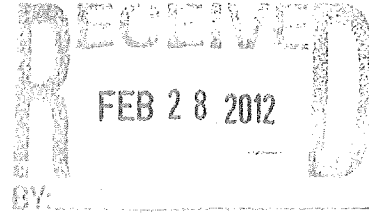
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February 27, 2012

VIA FIRST CLASS U.S. MAIL

Judge William E. Smith
United States District Court
Federal Building and Courthouse
One Exchange Terrace
Providence, RI 02903



Re: Transamerica Life Insurance Company and Western Reserve Life Insurance Company v. Caramadre, et al. C.A. No.: 09-470/S; 09-471/S; 09-472/S; 09-473/S; 09-502/S; 09-549/S; 09-564/S

Dear Judge Smith:

Enclosed please find two competing forms of Order with respect to the entry of a stay in these matters as contemplated at the Chambers Conference on February 22, 2012. The Plaintiffs and Defendants have been unable to agree as to the form of Order. Accordingly we are submitting both forms of order to you for your determination as to which one should enter. Attachment 1 is the form of Order agreed to by all Defendants. Attachment 2 is the form of Order proposed by Plaintiffs.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "Adam M. Ramos", written over a white background.

Adam M. Ramos

AMR/jrc
Enclosures

cc: Brooks R. Magratten, Esq.
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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;)

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.

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

Defendants;

C.A. No. 09-473-S

WESTERN RESERVE LIFE ASSURANCE
CO. OF OHIO,

Plaintiff,

vs.

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

Defendants;

C.A. No. 09-502-S

TRANSAMERICA LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

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

Defendants; and

C.A. No. 09-549-S

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

STAY ORDER

These matters came before the Court for a chambers conference on February 22, 2012, for consideration of several pending motions, including the Emergency Renewed Motion for Partial Stay of Defendants Joseph Caramadre, Raymour Radhakrishnan, Estella Rodrigues and ADM Associates, LLC (Document No. 125 in Case No. 09-470-S-DLM) and other related motions docketed in each of the cases. After that conference, it is hereby

ORDERED, ADJUDGED AND DECREED:

1. With the exceptions noted in this Order, these cases (C.A. Nos. 09-470, 09-471, 09-472, 09-473, 09-502, 09-549 and 09—564) are stayed pending the resolution of the criminal matter, *United States v. Caramadre et al.*, CR No. 11-186;
2. Plaintiffs may continue to pursue document discovery in accordance with paragraph 4 of the Initial Case Management Order (Document No. 58 in Case No. 09-470-S-DLM), which paragraph remains in full force and effect until further order of the Court; all other terms and obligations of the Initial Case Management Order are hereby stayed pursuant to this order;
3. The Court will consider motions for entry of final judgment pursuant to Rule 54(b) from any defendant against whom there are no longer any pending claims as a result of this Court’s

Opinion and Order of February 7, 2012 on the motions to dismiss (Document No. 132 in Case No. 09-470-S-DLM);

4. Plaintiffs may appeal the entry of any final judgment entered as a result of any motion filed pursuant to paragraph 3; and

5. Estate Planning Resources, Inc's ("EPR") obligation to respond to the interrogatories propounded by the plaintiffs pursuant to the Order Granting in Part Plaintiffs' Motion to Compel Defendant Estate Planning Resources to Respond to Interrogatories (Document No. 122 in Case No. 09-470) is stayed pending the resolution of a forthcoming motion for reconsideration of that order that EPR will file.

6. No other discovery, motion practice or other litigation activity other than those set forth in paragraphs 2 through 5 of this Order is required or permitted.

IT IS SO ORDERED.

William E. Smith
United States District Judge
Date: February __, 2012

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;)

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.)	
)	

STAY ORDER

These matters came before the Court for a chambers conference on February 22, 2012, for consideration of several pending motions, including the Emergency Renewed Motion for Partial Stay of Defendants Joseph Caramadre, Raymour Radhakrishnan, Estella Rodrigues and ADM Associates, LLC (Document No. 125 in Case No. 09-470-S-DLM) and other related motions docketed in each of the cases. After that conference, it is hereby

ORDERED, ADJUDGED AND DECREED:

1. With the exceptions noted in this Order, these cases (C.A. Nos. 09-470, 09-471, 09-472, 09-473, 09-502, 09-549 and 09—564) are stayed pending the resolution of the criminal matter, *United States v. Caramadre et al.*, CR No. 11-186;
2. Plaintiffs may continue to pursue document discovery in accordance with paragraph 4 of the Initial Case Management Order (Document No. 58 in Case No. 09-470-S-DLM), which paragraph remains in full force and effect until further order of the Court; all other terms and obligations of the Initial Case Management Order are hereby stayed pursuant to this order;
3. Estate Planning Resources, Inc’s (“EPR”) obligation to respond to the interrogatories propounded by the plaintiffs pursuant to the Order Granting in Part Plaintiffs’ Motion to Compel

Defendant Estate Planning Resources to Respond to Interrogatories (Document No. 122 in Case No. 09-470) is stayed pending the resolution of a forthcoming motion for reconsideration of that order that EPR shall file on or before March 13, 2012.

4. No other discovery other than that set forth in this Order is permitted without leave of Court.

IT IS SO ORDERED.

William E. Smith
United States District Judge
Date: February __, 2012