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

CO. OF OHIO, JOSEPH CARAMAE RADHAKRISHNAN	, ESTATE PLANNING HARRISON CONDIT,	) ) ) ) C.A. No. 09-470-S ) ) )
	Defendants;	)
TRANSAMERICA L COMPANY,	IFE INSURANCE Plaintiff,	) ) ) )
	vs.	
JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN, ESTATE PLANNING RESOURCES, INC., ESTELLA RODRIGUES, EDWARD MAGGIACOMO, JR., LIFEMARK SECURITIES CORP., and PATRICK GARVEY, Defendants;		) C.A. No. 09-471-S ) ) ) ) )
WESTERN RESERV CO. OF OHIO,	E LIFE ASSURANCE	) ) )
	Plaintiff, vs.	) ) C.A. No. 09-472-S
	, ESTATE PLANNING ADM ASSOCIATES, ) NRAHAN, THE	, ) ) ) )

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

## PLAINTIFFS' MOTION TO EXTEND TIME TO FILE REPLY TO DEFENDANT CARAMADRE'S OBJECTION TO MOTION TO ATTACH

Plaintiffs Western Reserve Life Assurance Co. of Ohio and Transamerica Life Insurance Company (together "Plaintiffs") move pursuant to Fed. R. Civ. P. 6 to extend the deadline to file their reply to defendant Joseph Caramadre's Objection to Motion to Attach ("Objection," filed as Doc. 148 in C.A. No. 09-470).

Caramadre filed his Objection on March 4, 2013. Plaintiffs request a two week extension, to March 28, 2013, to file their reply. This extension is necessary to allow Plaintiffs the opportunity to fully and succinctly address the issues Caramadre raises in his Objection.

The requested extension will not have an impact on the progress of these civil actions. A focal point of Plaintiff's motion to attach and Caramadre's Objection thereto is Caramadre's guilty plea in the related criminal action pending in this Court, Criminal No. 11-186/S. Caramadre has moved to withdraw his plea. On March 12, 2013, the Government filed its objection to Caramadre's motion. Caramadre has argued that the resolution of that motion may have a bearing on Plaintiff's motion to attach. It is unlikely Caramadre's motion to withdraw will be ruled upon prior to March 28, 2013.

For these reasons, Plaintiffs respectfully request that the deadline for filing their reply to Caramadre's Objection be extended to March 28, 2013.

Dated: March 13, 2013

Respectfully submitted,

/s/ Brooks R. Magratten Brooks R. Magratten, Esq., No. 3585 David E. Barry, Esq., *pro hac vice admitted* Michael J. Daly, Esq. No. 6729 PIERCE ATWOOD LLP Attorneys for Plaintiffs 10 Weybosset St., Suite 400 Providence, RI 02903 (401) 588-5113 [Tel.] (401) 588-5166 [Fax] bmagratten@pierceatwood.com dbarry@pierceatwood.com

## **Certificate of Service**

I certify that the foregoing motion was electronically filed with the Clerk of the Court on

March 13, 2013, and that it is are available for viewing and downloading from the Court's

CM/ECF system. All counsel of record have been served by electronic means.

/s/ Brooks R. Magratten