

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

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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; )

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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; )

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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. )	
)	

**MEMORANDUM OF LAW IN SUPPORT OF MOTION TO WITHDRAW**

Pursuant to LR Cv 7 and LR Gen 206(e), Robert G. Flanders, Jr., Adam M. Ramos, and the law firm of Hinckley, Allen & Snyder LLP (collectively “Hinckley Allen”) submit this Memorandum of Law in support of their Motion to Withdraw as Counsel for Defendants Joseph Caramadre, Raymour Radhakrishnan and Estate Planning Resources, Inc. (“EPR”) in each of the above-captioned cases and Defendant Harrison Condit in C.A. Nos. 09-470 and 09-564.

In support of the requested relief, Hinckley Allen states as follows:

1. Hinckley Allen has represented Defendants Caramadre, Radhakrishnan, EPR, and Condit in these cases since the plaintiffs filed their complaints in 2009.
2. On March 22, 2013, attorney Randy Olen entered his appearance in these cases on behalf of Defendants Caramadre and EPR. He is familiar with these cases and is or will be fully prepared to address any matters pending in these cases, including trial, without delaying the cases. Attorney Olen also is fully prepared to address the pending motion seeking a prejudgment attachment against Defendant Caramadre. Accordingly,

Attorney Olen is fully prepared to replace Hinckley Allen as counsel for Defendants Caramadre and EPR in these matters. Moreover, Defendant Caramadre, who is also the principal of EPR, has informed Hinckley Allen that it is his intent that Attorney Olen replace Hinckley Allen as counsel for himself and EPR in these matters.

3. Radhakrishnan is a co-defendant with Caramadre in related criminal proceedings – *United States v. Caramadre*, CR 11-186. Recent developments in that criminal matter give rise to a potential conflict of interest between Caramadre and Radhakrishnan.

4. Because of the potential conflict of interest caused by the developments in the criminal proceeding, Hinckley Allen should not continue to represent either Caramadre or Radhakrishnan in this matter.

5. Radhakrishnan and Condit both are capable of representing themselves *pro se* in the event they are unable to find replacement counsel. In fact, Radhakrishnan represented himself *pro se* in the criminal matter references *supra*.

6. Radhakrishnan's current address is 16 Conifer Lane, Amherst, New Hampshire 03031.

7. Condit's current address is 536 Middle Road, East Greenwich, Rhode Island 02818. Given the conspiracy-based nature of the remaining civil claims in the cases where Condit is a party, there may be conflicts of interest between Condit and Caramadre that preclude our representation of these defendants.

8. Caramadre's current address is 90 Beechwood Drive, Cranston, Rhode Island 02921.

9. EPR's has no current address as it is no longer a viable entity.

Accordingly, we sent notice of this motion to EPR in care of Mr. Caramadre's last known address at 90 Beechwood Drive, Cranston, Rhode Island 02921, as he is the majority owner of this entity.

10. Hinckley Allen has made reasonable efforts to confirm that notices sent to the foregoing addresses are likely to be received by Caramadre, Radhakrishnan, EPR, and Condit.

11. These cases are stayed pending final resolution of the related criminal matters. The only pending matter is a motion seeking a prejudgment attachment against Caramadre. The parties have fully briefed that motion, and Attorney Olen will be ready to represent Defendant Caramadre in connection with that motion if and when oral argument is scheduled.

12. Currently, there are no other motions or other matters pending in these cases that impact EPR, Radhakrishnan, or Condit. Accordingly, Hinckley Allen's withdrawal will not cause a need to extend any deadlines.

13. Hinckley Allen has served a copy of this motion on Caramadre, Radhakrishnan, EPR and Condit by first class mail, postage prepaid, or by e-mail at the addresses set forth in paragraphs 8-11, together with a cover letter informing them (1) of their right to object to the motion; and (2) advising them that any delay in retaining substitute counsel will not be considered grounds for delay of any proceedings in these cases.

14. An affidavit attesting that Caramadre, Radhakrishnan, EPR, and Condit are not in the military service is attached as Exhibit A.

WHEREFORE, Robert G. Flanders, Jr, Adam M. Ramos, and the law firm of Hinckley, Allen & Snyder LLP request that this Court:

- A. Grant their Motion to Withdraw as counsel in this matter; and
- B. Order such further relief as this Court deems just and necessary.

/s/ Robert G. Flanders, Jr.  
Robert G. Flanders, Jr. (#1785)  
Adam M. Ramos (#7591)  
Hinckley, Allen & Snyder LLP  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
Tel. (401) 457-5164  
Fax. (401) 277-9600  
Email: rflanders@haslaw.com  
aramos@haslaw.com

**CERTIFICATION**

I hereby certify that on March 29, 2013, 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.

Notice also has been sent by first class mail, respectively, to:

Raymour Radhakrishnan 16 Conifer Lane Amherst, NH 03031	Harrison Condit 536 Middle Road East Greenwich, RI 02818
Joseph Caramadre 90 Beechwood Drive Cranston, RI 02921	Estate Planning Resources, Inc. 90 Beechwood Drive Cranston, RI 02921

/s/ Robert G. Flanders, Jr.