

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

Transamerica Life Insurance Company,
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

**MEMORANDUM OF LAW IN SUPPORT OF THE JOINT MOTION
OF JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN, EDWARD
HANRAHAN, AND EDWARD L. MAGGIACOMO, JR. FOR PROTECTIVE ORDER**

Joseph A. Caramadre, Raymour Radhakrishnan, Edward Hanrahan, and Edward Maggiacomo, Jr. (hereinafter referred to collectively as the “Defendants”) by and through the undersigned, submit this Memorandum of Law in Support of their Joint Motion for Protective Order, filed on April 14, 2010. In further support of their Joint Motion for Protective Order, the Defendants incorporate herein by reference the arguments and analysis made in the Memorandum of Law in Support of Respondents’ Opposition to the Security & Exchange Commission’s Application for Order to Show Cause and for Order to Comply with Administrative Subpoenas, filed in Securities & Exchange Commission v. Caramadre, M.C. No. 10-52/S on April 27, 2010.

Respectfully submitted,

JOSEPH A. CARAMADRE,
RAYMOUR RADHAKRISHNAN, and
EDWARD HANRAHAN
By their attorneys,

/s/ Robert G. Flanders, Jr.
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By his attorney,

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DATED: April 27, 2010

CERTIFICATION

I hereby certify that on April 27, 2010, a copy of 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/ Robert G. Flanders, Jr.