

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

_____)	
TRANSAMERICA LIFE INSURANCE)	
COMPANY,)	
)	
Plaintiff,)	
)	
vs.)	
)	C.A. No.: 09-471-WS
JOSEPH CARAMADRE, RAYMOUR)	
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC., ESTELLA)	
RODRIGUES, EDWARD MAGGIACOMO,)	
JR., LIFEMARK SECURITIES CORP., and)	
PATRICK GARVEY,)	
)	
Defendants.)	
_____)	

STIPULATION

By agreement of the parties, Defendants Joseph A. Caramadre, Raymour Radhakrishnan, Estate Planning Resources, Inc, Estella Rodrigues, Edward Maggiacomo, Jr., and Lifemark Securities Corp. (hereinafter referred to collectively as the “Defendants”) shall have up to and including June 30, 2010 to respond to Plaintiff Transamerica Life Insurance Company’s Amended Complaint. This extension is without prejudice to the Defendants seeking additional time to respond.

TRANSAMERICA LIFE INSURANCE
COMPANY,

By its Attorneys,

/s/ Brooks R. Magratten

Brooks R. Magratten (# 3585)

Michael J. Daly (#6729)

David E. Barry (*Pro Hac Vice*)

PIERCE ATWOOD LLP

Attorneys for Plaintiff

10 Weybosset St., Suite 400

Providence, RI 02903

Tel. (401) 588-5113

Fax (401) 588-5166

mdaly@pierceatwood.com

bmagratten@pierceatwood.com

dbarry@pierceatwood.com

DATED: June 14, 2010

JOSEPH A. CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., and ESTELLA
RODRIGUES,

By their Attorneys,

/s/ Robert G. Flanders, Jr.

Robert G. Flanders, Jr. (#1785)

Eric S. Giroux (#7420)

Matthew H. Parker (#8111)

HINCKLEY, ALLEN & SNYDER LLP

50 Kennedy Plaza, Suite 1500

Providence, RI 02903

Tel. (401) 274-2000

Fax. (401) 277-9600

rflanders@haslaw.com

egiroux@haslaw.com

mparker@haslaw.com

DATED: June 14, 2010

EDWARD L. MAGGIACOMO, JR.

By his Attorney,

/s/ Anthony M. Traini

Anthony M. Traini (#4793)
ANTHONY M. TRAINI, P.C.
56 Pine Street, Suite 200
Providence, RI 02903
Tel. (401) 621-4700
Fax. (401) 621-5888
amt@trainilaw.com

DATED: June 14, 2010

LIFEMARK SECURITIES CORP.

By its Attorneys,

/s/ Joseph V. Cavanagh, Jr.

Joseph V. Cavanagh, Jr. (#1139)
Mary Cavanagh Dunn (#6712)
BLISH & CAVANAGH, LLP
30 Exchange Terrace
Providence, RI 02903
Tel: (401) 831-8900
Fax: (401) 751-7542
jvc@blishcavlaw.com
mcd@blishcavlaw.com

DATED: June 14, 2010

ENTERED as an Order of this Court this _____ day of _____, 2010.

ENTER:

BY ORDER:

CERTIFICATION

I hereby certify that on June 14, 2010, 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/ Robert G. Flanders, Jr. _____