

**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.)	
)	

**DEFENDANTS JOSEPH A. CARAMADRE, RAYMOUR RADHAKRISHNAN, AND
EDWARD MAGGIACOMO’S MOTION TO STAY**

Defendants Joseph A. Caramadre, Raymour Radhakrishnan, and Edward Maggiacomo, by and through undersigned counsel, hereby move to stay this action brought by Plaintiff Transamerica Life Insurance Company (“Transamerica”) until the completion of a parallel federal grand jury criminal investigation in which these defendants have been identified as “targets” and the resolution of any criminal proceedings emerging therefrom.

The circumstances warrant a stay because allowing this and the related civil actions brought by Transamerica and its sister company, Western Reserve Life Assurance Company of Ohio (“WRL”), to proceed in tandem with the grand jury investigation will undermine the interests of justice and place an onerous burden on the Defendants by placing these proceedings on a fundamentally unfair footing while imposing onerous practical burdens on the Defendants. It would also threaten to compromise the Fifth Amendment rights of the “targets,” adversely

impact the interests of third parties and the Government, and, arguably, benefit the Plaintiffs as well. The preliminary status of the case also weighs in favor of a stay.

In further support hereof, Defendants file a memorandum of law, together with supporting exhibits.

Respectfully submitted,

JOSEPH A. CARAMADRE AND RAYMOUR
RADHAKRISHNAN,
By their Attorneys,

/s/ Robert G. Flanders, Jr.

Robert G. Flanders, Jr., Esq. (#1785)

Eric S. Giroux, Esq. (#7420)

Matthew H. Parker, Esq. (#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

EDWARD L. MAGGIACOMO, JR.

By his Attorney,

/s/ Anthony M. Traini

Anthony M. Traini (#4793)

56 Pine Street, Suite 200

Providence, RI 02903

Tel. (401) 621-4700

Fax. (401) 621-5888

amt@trainilaw.com

Dated: June 16, 2010

CERTIFICATION

I hereby certify that on June 16, 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.