## 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. |  |
| -) |  |

## PLAINTIFF TRANSAMERICA LIFE INSURANCE COMPANY'S OBJECTION TO DEFENDANTS’ MOTION TO STAY

Plaintiff Transamerica Life Insurance Company objects to the motion to stay filed by Defendants Joseph Caramadre, Edward Maggiacomo, and Raymour Radhakrishnan in the above-captioned action. In support of its Objection, Plaintiff submits the accompanying Consolidated Memorandum of Law.

Respectfully submitted on this 13th day of July, 2010.
/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 Plaintiff
10 Weybosset St., Suite 400
Providence, RI 02903
(401) 588-5113 [Tel.]
(401) 588-5166 [Fax]
bmagratten@pierceatwood.com
dbarry@pierceatwood.com
mdaly@pierceatwood.com

## CERTIFICATE OF SERVICE

I certify that the within document was electronically filed with the clerk of the court on July 13, 2010, and that it is available for viewing and downloading from the Court's ECF system. Service by electronic means has been effectuated on all counsel of record.
/s/ Michael J. Daly

