

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

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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.

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C.A. No. 09-471-S

**MOTION TO DISMISS AND REQUEST FOR RECONSIDERATION  
OF DEFENDANT EDWARD L. MAGGIACOMO, JR.**

Pursuant to Fed.R.Civ.P. 8(a), 9, 11 and 12(b)(6), Defendant Edward L. Maggiacomo, Jr. hereby moves to dismiss plaintiff's Amended Complaint, and for reconsideration of his previous motion to dismiss to the extent that motion was denied, all for the reasons set forth in his memorandum in support hereof filed simultaneously herewith.

EDWARD L. MAGGIACOMO, JR.

By his Attorney,

/s/ Anthony M. Traini

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Dated: October 4, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2010, a copy of the within document 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/ Anthony M. Traini  
Anthony M. Traini