

CERTIFICATION

I hereby certify that on November 17, 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.*_____

**UNITED STATES DISTRICT COURT
FOR THE 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.)

**MEMORANDUM OF LAW IN SUPPORT OF
ROBERT G. FLANDERS, JR., ERIC S. GIROUX, AND
MATTHEW H. PARKER'S MOTION TO WITHDRAW**

Pursuant to LR Cv 7 and LR Gen 206(e)(2), Attorneys Robert G. Flanders, Jr., Eric S. Giroux, and Matthew H. Parker (the "Movants") submit the following memorandum of law in support of their Motion to Withdraw from representing Defendants Joseph Caramadre, Raymour Radhakrishnan, Estella Rodrigues, and Estate Planning Resources, Inc. (the "Defendants").

The Movants attach hereto as Exhibit A an affidavit signed by attorney Matthew H. Parker attesting to the fact that Mr. Caramadre, Mr. Radhakrishnan, and Ms. Rodrigues are not in the military service of the United States as defined in the Soldiers' and Sailors' Civil Relief Act [50 App. U.S.C. § 501 *et seq*], as amended.

Mr. Caramadre's current business address is 1000 Chapel View Boulevard, Suite 270, Cranston, Rhode Island 02920, Mr. Radhakrishnan's current home address is 16 Conifer Lane, Amherst, NH 03031, Ms. Rodrigues's current home address is 330 Sowams Road, Barrington,

RI 02806-2727, and Estate Planning Resources, Inc.'s current business address is 1000 Chapel View Boulevard, Suite 270, Cranston, RI 02930. The Movants have confirmed that notices sent to these address are likely to be received by Mr. Caramadre, Mr. Radhakrishnan, Ms. Rodrigues, and Estate Planning Resources, Inc.

On October 4, 2010, the Movants filed a Motion to Dismiss and Request for Reconsideration on behalf of Mr. Caramadre, Mr. Radhakrishnan, Ms. Rodrigues, and Estate Planning Resources, Inc. Plaintiff's response to said motion is due on November 17, 2010. The trial date for the above-captioned matter is still unknown because the pleadings have not yet closed and discovery is still in its infancy stages. The Honorable William E. Smith has scheduled a status conference for this matter on January 3, 2011 at 10:00 a.m. No party will be prejudiced by the allowance of this Motion and the Motion is not being filed for the purpose of delay.

Certification Pursuant to LR Gen 206(e)(2)(B)

The Movants hereby certify that they have notified Mr. Caramadre, Mr. Radhakrishnan, Ms. Rodrigues, and Estate Planning Resources, Inc. of this motion by both regular mail, postage prepaid, and by certified mail, return receipt requested. The Movants also hereby certify that they have advised Mr. Caramadre, Mr. Radhakrishnan, Ms. Rodrigues, and Estate Planning Resources, Inc. that they may object to this motion and that any failure or delay in retaining substitute counsel may not be considered grounds for delaying the trial or any other matter scheduled in the case.

Mr. Caramadre, Mr. Radhakrishnan, Ms. Rodrigues, and Estate Planning Resources, Inc. have assented to this Motion, and notices of their assent are attached hereto as Exhibit B.

/s/ Robert G. Flanders, Jr.

/s/ Eric S. Giroux

/s/ Matthew H. Parker

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

DATED: November 17, 2010

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 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.