

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

_____)
)
WESTERN RESERVE LIFE ASSURANCE)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., HARRISON CONDIT,)
And FORTUNE FINANCIAL SERVICES,)
INC.)
Defendants;)

C.A. No.: 09-470-WS

_____)
)
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;)

C.A. No.: 09-471-WS

_____)
)
WESTERN RESERVE LIFE ASSURANCE)
COMPANY OF OHIO,)
Plaintiff,)

vs.)

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., ADM ASSOCIATES,)
LLC, EDWARD HANRAHAN, THE)
LEADERS GROUP, INC., and CHARLES)
BUCKMAN,)
Defendants;)

C.A. No.: 09-472-WS

WESTERN RESERVE LIFE ASSURANCE
COMPANY OF OHIO,

Plaintiff,

vs.

JOSEPH CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., DK LLC, EDWARD
HANRAHAN, THE LEADERS GROUP,
INC., and JASON VEVEIROS,

Defendants;

C.A. No.: 09-473-WS

WESTERN RESERVE LIFE ASSURANCE
COMPANY OF OHIO,

Plaintiff,

vs.

JOSEPH CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC., NATCO PRODUCTS
CORP., EDWARD HANRAHAN, and THE
LEADERS GROUP, INC.,

Defendants;

C.A. No.: 09-502-WS

TRANSAMERICA LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

LIFEMARK SECURITIES CORP., JOSEPH
CARAMADRE, RAYMOUR
RADHAKRISHNAN, ESTATE PLANNING
RESOURCES, INC. and EDWARD
MAGGIACOMO, JR.,

Defendants; and

C.A. No. 09-549-WS

_____)	
WESTERN RESERVE LIFE ASSURANCE)	
COMPANY OF OHIO,)	
Plaintiff,)	
vs.)	
JOSEPH CARAMADRE, RAYMOUR)	C.A. No. 09-564-WS
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC., HARRISON CONDIT,)	
and FORTUNE FINANCIAL SERVICES,)	
INC.,)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION FOR ENTRY OF A
CONFIDENTIALITY ORDER

Plaintiffs in the above actions now move for entry of the proposed confidentiality order appended hereto as Exhibit A. Plaintiff's file herewith a supporting memorandum.

Attorneys for Plaintiffs

/s/ Brooks R. Magratten
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 Michael J. Daly, Esq., #6728
 David E. Barry, Esq., *pro hac vice admitted*
 PIERCE ATWOOD LLP
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 Providence, RI 02903
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 (401) 588-5166 [Fax]
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mdaly@pierceatwood.com
dbarry@pierceatwood.com

Date: November 29, 2010

CERTIFICATE OF SERVICE

I certify that the within document was electronically filed with the clerk of the court on November 29, 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/ Brooks R. Magratten

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HANRAHAN, THE LEADERS GROUP,
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RESOURCES, INC., NATCO PRODUCTS
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RESOURCES, INC., HARRISON CONDIT,)	
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INC.,)	
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MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR
ENTRY OF A CONFIDENTIALITY ORDER

These actions concern the sale of variable annuity policies issued by plaintiffs Western Reserve Life Assurance Co. of Ohio and Transamerica Life Insurance Company. Pursuant to the Court's prior orders, the parties are now engaged in limited discovery and are preparing to produce documents and information that may be considered confidential because they may include sensitive commercial, personal health care, personal identifying and trade secret information.

For this reason plaintiffs have proposed the confidentiality order appended to this motion. All parties have agreed to it except for those represented by Mr. Flanders. The order addresses both the discovery and use of Confidential Information throughout the progress of these actions. Plaintiffs believe this order will avoid disagreements that may otherwise arise regarding discovery or use of Confidential Information and will facilitate discovery and trial

preparation. For these reasons plaintiffs now respectfully ask the Court to enter the attached order.

Attorneys for Plaintiffs

/s/ Brooks R. Magratten
Brooks R. Magratten, Esq., #3585
Michael J. Daly, Esq., #6728
David E. Barry, Esq., *pro hac vice admitted*
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/s/ Brooks R. Magratten