

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

WESTERN RESERVE LIFE ASSURANCE CO. OF OHIO,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No.: 09-470-WS
)	
JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN, ESTATE PLANNING RESOURCES, INC., HARRISON CONDIT, and FORTUNE FINANCIAL SERVICES, INC.,)	
)	
Defendants.)	
)	
TRANSAMERICA LIFE INSURANCE COMPANY,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No.: 09-471-WS
)	
JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN, ESTATE PLANNING RESOURCES, INC., ESTELA RODRIGUES, EDWARD MAGGIACOMO, JR., LIFEMARK SECURITIES CORP., and PATRICK GARVEY,)	
)	
Defendants.)	
)	
WESTERN RESERVE LIFE ASSURANCE CO. OF OHIO,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No.: 09-472-WS
)	
JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN, ESTATE PLANNING RESOURCES, INC., ADM ASSOCIATES, LLC, EDWARD HANRAHAN, THE LEADERS GROUP, INC., and CHARLES BUCKMAN,)	
)	
Defendants.)	
)	

WESTERN RESERVE LIFE ASSURANCE
CO. 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
CO. 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.

C.A. No. 09-549-WS

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. 09-564-WS

**OBJECTION OF DEFENDANTS ESTATE PLANNING RESOURCES, INC.,
ADM ASSOCIATES, LLC, JOSEPH CARAMADRE, RAYMOUR RADHAKRISHNAN,
HARRISON CONDIT, AND ESTELA RODRIGUES TO
PLAINTIFFS' MOTION FOR ENTRY OF A CONFIDENTIALITY ORDER**

Defendants Estate Planning Resources, Inc., ADM Associates, LLC, Joseph Caramadre, Raymour Radhakrishnan, Harrison Condit, and Estela Rodrigues (collectively "Defendants"), by and through the undersigned, hereby object to Plaintiffs' Motion for Entry of a Confidentiality Order. In support of their objection, Defendants refer the Court to their accompanying Memorandum of Law, filed together herewith.

Respectfully submitted,

ESTATE PLANNING RESOURCES, INC., ADM
ASSOCIATES, LLC, JOSEPH CARAMADRE,
RAYMOUR RADHAKRISHNAN, HARRISON
CONDIT, AND ESTELA RODRIGUES

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

DATED: December 16, 2010

CERTIFICATION

I hereby certify that on December 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.