

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

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

**PLAINTIFFS’ MEMORANDUM IN REPLY TO  
DEFENDANTS’ OBJECTION TO PLAINTIFFS’  
MOTION FOR A CONFIDENTIALITY ORDER**

To be clear, all parties except for Mr. Caramadre and related entities<sup>1</sup> have agreed to plaintiffs’ proposed Confidentiality Order. And even Mr. Caramadre objects only to the last two sentences of the first numbered paragraph of plaintiffs’ proposed order:

All Confidential Information produced or exchanged in the course of this litigation shall be used solely for the purpose of this litigation and for no other purpose whatsoever, and shall not be disclosed to any person except in accordance with the terms hereof. To the extent the parties wish to use Confidential Information in any other civil, administrative or criminal proceeding, they must seek consent from the Producing Parties and, if unable to obtain consent, may seek relief from this Court.

In summary, Mr. Caramadre wants free reign to use Confidential Information produced by any party for any purpose in any other civil or criminal action Mr. Caramadre

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<sup>1</sup> Estate Planning Resources, Inc., ADM Associates, LLC, Raymour Radhakrishnan, Harrison Condit and Estella Rodrigues. For purposes of this reply, these defendants shall be referred to collectively as “Mr. Caramadre.”

deems “related” to these actions. Mr. Caramadre’s demand for a “free pass” with respect to any information revealed by any party in these civil actions is patently unreasonable.

Plaintiffs have attempted to strike a reasonable compromise in paragraph one of the proposed order. Should Mr. Caramadre want to use Confidential Information in another proceeding, he need only ask the producing party. If Mr. Caramadre and the producing party cannot agree, then Mr. Caramadre can seek relief from this Court.

The burden properly rests with Mr. Caramadre to seek permission for him to use Confidential Information as he wishes in other actions. To impose a burden on producing parties to police Mr. Caramadre’s use of Confidential Information outside of these actions is plainly unreasonable, particularly because the producing parties may have no idea how Mr. Caramadre intends to use or is using their information in other criminal or civil actions.

For these reasons, the Court should now enter the Confidentiality Order plaintiffs have proposed.

*Attorneys for Plaintiffs*

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Date: December 22, 2010

**CERTIFICATE OF SERVICE**

I certify that the within document was electronically filed with the clerk of the court on December 22, 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