## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

C.A. No. 09-470-WS

WESTERN RESERVE LIFE ASSURANCE

CO. OF OHIO

Plaintiff,

v.

:

JOSEPH CARAMADRE, RAYMOUR

RADHAKRISHNAN, ESTATE PLANNING RESOURCES, INC., HARRISON CONDIT,

And FORTUNE FINANCIAL SERVICES

INC.

Defendants.

TRANSAMERICA LIFE INSURANCE

COMPANY,

Plaintiff,

WESTERN RESERVE LIFE ASSURANCE

CO. OF OHIO

Plaintiff,

v. : C.A. No. 09-473S

JOSEPH CARAMADRE, RAYMOUR

RADHAKRISHNAN, ESTATE PLANNING

RESOURCES, INC., DK LLC,

EDWARD HANRAHAN, THE LEADERS

GROUP, INC and JASON VEVEIROS

Defendants. :

## MOTION OF DEFENDANT DK, LLC FOR DISMISSAL OF THIRD AMENDED COMPLAINT

Defendant DK, LLC moves, pursuant to Fed. R. Civ. P. 12(b)(6) for dismissal of the third amended complaint, for the reasons set forth in the memorandum submitted herewith.

DK, LLC
By its attorneys,
/s/ R. Daniel Prentiss
R. Daniel Prentiss (#0783)
R. Daniel Prentiss, P.C.
One Turks Head Place, Suite 380
Providence, RI 02903
Tel: 401-824-5150

Fax: 401-824-5181 dan@prentisslaw.com

## CERTIFICATE OF SERVICE

I certify that the within document was electronically filed with the clerk of the court on April 4, 2011, 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/ R. Daniel Prentiss