

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

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)
)
vs.)
) C.A. No. 09-470-S
)
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-S
)
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-S
)
)
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.)

C.A. No. 09-473-S

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

Defendants;)

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)

Plaintiff,)

vs.)

C.A. No. 09-502-S

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

Defendants;)

TRANSAMERICA LIFE INSURANCE)
COMPANY,)

Plaintiff,)

vs.)

C.A. No. 09-549-S

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

Defendants; and)

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

STIPULATION

Plaintiffs, Western Reserve Life Assurance Co. of Ohio (“WRL”) and Transamerica Life Insurance Company (together “Plaintiffs”) and defendants Estate Planning Resources, Inc., Joseph Caramadre, Raymour Radhakrishnan, Harrison Condit, Estela Rodrigues, ADM Associates, LLC (together “EPR”) stipulate that Plaintiffs may have until April 25, 2011 to file its response to EPR’s Motion to Dismiss the Newly Amended Complaints and Request for Reconsideration.

WRL and defendant DK, LLC (“DK”) stipulate that WRL may have until April 25, 2011 to file its response to DK’s Motion for Dismissal of Third Amended Complaint.

/s/ Robert G. Flanders

Robert G. Flanders, Jr., Esq. No. 1785
Eric S. Giroux, Esq. No. 7420
Matthew H. Parker, Esq. No. 8111
HINCKLEY, ALLEN & SNYDER, LLP
Attorneys for Defendants
Estate Planning Resources, Inc.,
Joseph Caramadre
Raymour Radhakrishnan
Harrison Condit
Estela Rodrigues, and
ADM Associates, LLC
50 Kennedy Plaza, Suite 1500
Providence, RI 02903
(401) 274-2000 [Tel]
(401) 277-9600 [Fax]
rflanders@haslaw.com
egiroux@haslaw.com
mparker@haslaw.com

/s/ Michael J. Daly

Brooks R. Magratten, Esq., No. 3585
Michael J. Daly, Esq. No. 6729
PIERCE ATWOOD LLP
Attorneys for Plaintiffs
Western Reserve Life Assurance Co. of Ohio
Transamerica Life Insurance Company
10 Weybosset St., Suite 400
Providence, RI 02903
(401)588-5113 [Tel.]
(401)588-5166 [Fax]
bmagratten@pierceatwood.com
mdaly@pierceatwood.com

/s/ R. Daniel Prentiss

R. Daniel Prentiss, Esq., No. 0783
R. DANIEL PRENTISS, P.C.
Attorney for DK, LLC
One Turks Head Place, Suite 380
Providence, RI 02903
(401)824-5150 [Tel.]
(401)824-5181 [Fax]
dan@prentisslaw.com

Dated: April 11, 2011

CERTIFICATE OF SERVICE

I certify that on April 11, 2011, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system and that the document is available for viewing and downloading from the Court's CM/ECF system. All counsel of record have been served by electronic means.

/s/ Michael J. Daly