

**Date : 2/14/2022 5:34:59 PM**

**From : "Alphonse Talarico"**

**To : "Paul Dulberg"**

**Subject : Fw: Deposition of William (Bill) McGuire March 20, 2013 12 LA 178**

**Attachment : 2013-03-20\_Discovery Deposition of William McGuire.pdf;**

**From:** Alphonse Talarico

**Sent:** Sunday, February 13, 2022 1:34 PM

**To:** Alan Kravets <alan@kravets.net>

**Subject:** Deposition of William (Bill) McGuire March 20, 2013 12 LA 178

Dear Alan Kravets,

Please find attached the deposition of Defendant William (Bill) McGuire, stepfather of Defendant David Gagnon and husband of Defendant Carolyn McGuire.

Please review this deposition with an eye towards evidence of settlement malpractice, and of course legal malpractice.

I have some thoughts I would like you to also think about regarding this deposition:

a) page 50 line 4 to line 5 indicates that William McGuire's signature was reserved;

b) page 51 line 12 to line 24 indicates that William McGuire never signed.

Since the McGuires were land owners where the injury to Dulberg occurred I wonder how Mast knew the terms of the McGuires' real estate insurance policy (and for the matter, any other assets the McGuires' owned)?

It is curious that this Deposition was transcribed on April 9, 2013 which is 20 days after it was taken while the Deposition of David Gagnon was not prepared for reference/review in preparation for this deposition.

Please call with any questions,

Alphonse A. Talarico