

1 the one that actually --

2 Q. You're getting that information from Sue? I mean, you
3 were not present?

4 A. Yeah. Helluen confirmed it.

5 Q. At some point after your initial involvement and before
6 Mr. Bell was arrested, I think you indicated that it might be a
7 good idea to talk to an estate attorney, to see about this

8 property. Why didn't you -- I mean, you were representing
9 Mr. Bell, --

10 A. I'm not a trust lawyer. It would be asking me to, you
11 know, -- like asking an neurosurgeon to do a lower GI scope.
12 It's not my area of legal expertise.

13 Q. And, you did not recommend --

14 A. I don't even own a Trust Code.

15 Q. And, you left -- I mean, you didn't give them a name of
16 anybody? They ultimately --

17 A. No, I didn't give her -- I don't think I gave her Bill
18 Friedman's name. If I did, it would have been among a number
19 of names I might have given her. But, I don't think I even
20 gave her a name. I think she got his name from somebody else.

21 Q. Now, you said, -- I think you testified that once the
22 property was donated into the Trust, that it was simply just a
23 waiting game. Is that what you said?

24 A. My appreciation of the revocatory articles in the Civil
25 Code is that there's an outside time limit of three years.

EXHIBIT

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