

R. 1a

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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QBE SEGUROS,)	
)	
Plaintiff,)	Case No.
-vs-)	3:15-CV-02091-BJM
)	
CARLOS A. MORALES-)	
VAZQUEZ,)	
)	
Defendant.)	

TRANSCRIPT OF PROCEEDINGS
NON-JURY TRIAL – DAY FOUR – A.M. SESSION
HELD BEFORE THE
HONORABLE BRUCE J. McGIVERIN
UNITED STATES COURTHOUSE,
HATO REY, PUERTO RICO
THURSDAY, JUNE 28, 2018

APPEARANCES

FOR THE PLAINTIFF:

Ian P. Carvajal-Zarabozo, Esq.
Manuel Sosa-Baez, Esq.

FOR THE DEFENDANT:

Alberto J. Castaner-Padro, Esq.
Juan R. Gonzalez-Munoz, Esq.

THE INTERPRETER:

Carol Terry-Ces

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* * *

[4] Q Mr. Morales, on or about January 29th of 2010, you have an accident in a 40-foot Riviera, correct?

A That is correct.

* * *

Q Okay. And that accident was a grounding near the coast of Fajardo?

A Yes.

Q And the grounding was at night?

A Yes.

Q And you were alone, right?

[5] A Yes.

Q I'm sure it was a frightening experience that you were alone at night aground, correct?

A Yes.

Q And at the time of the grounding, you were operating the vessel?

A Yes.

* * *

[22] Q Okay. And that 2010 accident, it involved a salvage claim from Sea Tow, correct?

A Yes.

Q And Sea Tow charged you \$65,000?

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A Yes.

* * *

[26] Q My question, sir, was – okay. Please listen. The question is, you’re using the same playbook that you used with MAPFRE, pushing for a constructive total loss. You’re using that same playbook with QBE now, are you not? Yes or no?

A Yes.

* * *
