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Law360: Federal Tax Cases To Watch In 2023

Juan F. Vasquez, Jr. mentioned in Law360 article on federal tax cases to watch in 2023

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Juan F. Vasquez, Jr., shareholder and Tax Controversy Practice Co-Chair at Chamberlain Hrdlicka, commented on the U.S. Supreme Court case involving attorney-client privilege in a Law360 article on federal tax cases to watch in 2023.

In a case known as 'In re Grand Jury,' an unnamed law firm is fighting to keep some confidential tax expatriation documents from disclosure to a grand jury investigating its client. With ramifications for the entire legal practice, the case will determine the scope of attorney-client privilege regarding dual-purpose communications that contain both legal and nonlegal advice. The Supreme Court is scheduled to hear the case on January 9, 2023.

Since tax practitioners are involved regularly in multiuse communications, "it is really important for tax practitioners — everyday practitioners — to get some clarity" on the issue, said Vasquez. "Most of us do assume that privilege is understandably broad. It is there to protect and facilitate open communications for the purpose of rendering legal advice and for the client to receive legal advice."

For the full article, go to <https://www.law360.com/tax-authority/articles/1559636>